GRANT YARD RADIO SHOP PROJECT

INITIAL STUDY / MITIGATED NEGATIVE DECLARATION

Prepared for the County of San Mateo

Prepared by Circlepoint

46 S First Street, San José, CA 95113

April 2021

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San Mateo County

Grant Yard Radio Shop Project

Mitigated Negative Declaration (MND)

County File No: P30J1

Prepared for:

San Mateo County
555 County Center 5th Floor
Redwood City, CA 94063 (650) 363-4000

Prepared by:

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46 South First Street
San Jose, CA 95113

April 2021

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GRANT YARD RADIO SHOP PROJECT

MITIGATED NEGATIVE DECLARATION (MND)

Pursuant to the California Environmental Quality Act (CEQA)
Division 13, Public Resources Code

San Mateo County
Department of Public Works
555 County Center, 5th Floor
Redwood City, CA 94063
(650) 208-9855

1. Project Description

San Mateo County proposes to construct a new 13,000-square foot one-story radio service facility at 752 Chestnut Street. The County is the lead agency and sponsor under the California Environmental Quality Act (CEQA).

The project site, which is owned by San Mateo County, is located on one parcel with an address of 752 Chestnut Street (APN 054-063-180). 752 Chestnut Street is in the eastern portion of Redwood City, San Mateo County, California. The 3.4-acre parcel containing the project site is predominantly flat. The site is accessible via driveways on Chestnut Street and Spring Street. The eastern and southern property lines are adjacent to surrounding development.

The project site is in an established neighborhood that contains a mix of existing land uses. The project site is bordered by a one-story retail building to the east and a single-family residential neighborhood to the south. Across Spring Street from the project site are parking areas and an office building, and across from Chestnut Street is a single-family residential neighborhood. State Route (SR) 84 is located southeast of the project site, separated by a mix of commercial, single-family residential, and multi-family residential development.

The project would replace the existing 2,700 square-foot one-story building used for County pest control services along the western property line with a new 13,000 square-foot two-story radio service facility. The new building would contain both office space and a service garage to work on County vehicles and radio equipment. Condensers and a heat recovering unit would be located on the east side of the new building. An emergency generator would be located east of the new building near the southern property line. Operation of the project would be similar to that of the prior radio service facility and would include monitoring of communication on all County two-way radios, equipment storage, and repair of County radio equipment on an as-needed basis.

All other existing uses currently conducted at the Grant Corporation Yard including office, outdoor and indoor storage and vehicle and equipment storage, maintenance, and repair, would continue to operate at existing capacities under the proposed project. No new curb cuts are proposed.

Grading required for the project would be designed to conform to the existing site as closely as possible and excavation would be minimal; no basement level or pile driving are proposed as part of the project. The amount of grading planned is the minimum required to allow for the construction of a level building pad, in conformance with current Building Codes. The maximum depth of excavation activities would be

approximately 8 to 10 feet, where the depth to groundwater is approximately 13 to 15 feet below ground surface (bgs). The entire volume of material to be excavated would primarily be exported off-site. No significant import or export of soil or engineered fill material is anticipated.

No trees would be removed. Some weedy ground cover would be removed to accommodate construction of the new radio service building. New drainage infrastructure is proposed with the intention of maintaining the existing flows and direction of stormwater runoff. The project would include new landscaping with recycled wood chips in all newly landscaped areas.

2. Determination

An MND, City File No. P30J1 is proposed by San Mateo County for the project. An IS and supporting documents have been prepared to determine if the project would result in potentially significant or significant impacts to the environment (**Exhibit A, Initial Study**). A Mitigation Monitoring and Reporting Program (MMRP) is included as **Exhibit B**. The public review period occurred from March 1, 2021 to March 30, 2021 and no comments were received. On the basis of the IS and the whole record, it has been determined that the proposed action, with the incorporation of the mitigation measures described below, will not have a significant impact on the environment. Because no public comments were received, there were no changes to the conclusions of the IS nor the determination of a MND.

Table 1
Summary of Mitigation Measures

Environmental Factor	***Mitigation Measures***	***Level of Environmental Impact***
Biological Resources	**Mitigation Measure BIO-1:** Activities related to the project, including, but not limited to, vegetation removal, ground disturbance, and construction and demolition shall occur outside of the bird breeding season (February 1 through August 31) if feasible. If construction will commence during the breeding season, then a pre-construction nesting bird survey shall be conducted no more than 7 days prior to initiation of ground disturbance and vegetation removal. The nesting bird pre-construction survey shall be conducted within the disturbance footprint and a 300-foot buffer for raptors and 150-foot buffer for passerines where access can be authorized. The survey shall be conducted by a biologist familiar with the identification of avian species known to occur in San Mateo County. If nests are found, an avoidance buffer (which is dependent upon the species, the proposed work activity, and existing disturbances associated with land uses outside of the site) shall be determined and demarcated by the biologist with bright orange construction fencing, flagging, construction lathe, or other means to mark the boundary. All construction personnel shall be notified as to the existence of the buffer zone and to avoid entering the buffer zone during the nesting	Less than Significant with Mitigation Incorporated

Table 1 Summary of Mitigation Measures		
Environmental Factor	***Mitigation Measures***	***Level of Environmental Impact***
	season. No ground disturbing activities shall occur within this buffer until the avian biologist has confirmed that breeding/nesting is completed, and the young have fledged the nest. Encroachment into the buffer shall occur only at the discretion of the qualified biologist.	
Biological Resources	**Mitigation Measure BIO-2**: If it is not possible to schedule project activities between September 1st and January 1st, then pre-construction surveys for nesting birds should be conducted by a qualified ornithologist to ensure that no nests will be disturbed during project implementation. An initial pre-construction survey to determine the likelihood of constraints due to the presence of an active nest should be conducted 14 days prior to the onset of construction activities with a final pre-construction survey conducted no more than 48 hours prior to the initiation of project activities. During this survey, a qualified ornithologist shall inspect all potential nesting habitats (e.g., trees, shrubs, grasslands, and buildings) within 300 feet of the project site for raptor nests and within 100 feet of the project site for nests of non-raptors. If an active nest (i.e., a nest with eggs or young, or any completed raptor nest attended by adults) is found sufficiently close to work areas that would be disturbed by these activities, the ornithologist, in consultation with the CDFW, will determine the extent of a disturbance-free buffer zone to be established around the nest (typically 300 feet for raptors and 100 feet for other species) to ensure that no nests of species protected by the MBTA and California Fish and Game Code will be disturbed during project implementation.	Less than Significant with Mitigation Incorporated
Biological Resources	**Mitigation Measure BIO-3:** If project activities will not be initiated until after the start of the nesting season, potential nesting substrate (e.g., bushes, trees, grasses, and other vegetation) that is scheduled to be removed by the project may be removed prior to the start of the nesting season (e.g., prior to January 1st) to reduce the potential for initiation of nests.	Less than Significant with Mitigation Incorporated
Cultural Resources	**Mitigation Measure CUL-1:** In the event Native American or other archaeological resources are encountered during construction, work shall be halted within 100 feet of the discovered materials and workers shall avoid altering the materials and their context until a qualified professional	Less than Significant with Mitigation incorporated

Table 1 Summary of Mitigation Measures		
Environmental Factor	***Mitigation Measures***	***Level of Environmental Impact***
	archaeologist has evaluated the situation and provided appropriate recommendations. If an archaeological site is encountered in any stage of development, a qualified archaeologist will be consulted to determine whether the resource qualifies as an historical resource or a unique archaeological resource. In the event that it does qualify, the archaeologist will prepare a research design and archaeological data recovery plan to be implemented prior to or during site construction. The archaeologist shall also prepare a written report of the finding, file it with the appropriate agency, and arrange for curation of recovered materials.	
Geology and Soils	**Mitigation Measure GEO-1:** Additional field investigations to obtain soil data and verify liquefaction potential should be conducted during the design phase. If it is determined that the potential for liquefaction is high at the project site, specific performance measures and ground improvements techniques shall be incorporated to reduce this hazard. These techniques shall be chosen during the final design phase, and may include: Jet grouting, cement deep soil mixing, and/or compaction grouting.	Less than Significant with Mitigation incorporated
Geology and Soils	**Mitigation Measure GEO-2:** The applicant shall prepare a monitoring program to determine the effects of construction on nearby improvements, including the monitoring of cracking and vertical movement of adjacent structures, and nearby streets, sidewalks, utilities, and other improvements. As necessary, inclinometers or other instrumentation shall be installed as part of the shoring system to closely monitor lateral movement. The program shall include a pre-construction survey including photographs and installation of monitoring points for existing site improvements.	Less than Significant with Mitigation incorporated
Geology and Soils	**Mitigation Measure GEO-3:** A discovery of a paleontological specimen during any phase of the project shall result in a work stoppage in the vicinity of the find until it can be evaluated by a professional paleontologist. Should loss or damage be detected, additional protective measures or further action (e.g., resource removal), as determined by a professional paleontologist, shall be implemented to mitigate the impact.	Less than Significant with Mitigation incorporated

Table 1 Summary of Mitigation Measures		
Environmental Factor	***Mitigation Measures***	***Level of Environmental Impact***
Geology and Soils	**Mitigation Measure GEO-4:** Periodic monitoring of known significant paleontological resources in the vicinity of the development (including areas where new road access has been provided) may be required to reduce the potential for looting and vandalism. Should loss or damage be detected, additional protective measures or further action (e.g., resource removal), as determined by a professional paleontologist, shall be implemented to mitigate the impact.	Less than Significant with Mitigation incorporated
Geology and Soils	**Mitigation Measure GEO-5:** Use existing roads to the maximum extent feasible to avoid additional surface disturbance.	Less than Significant with Mitigation incorporated
Geology and Soils	**Mitigation Measure GEO-6:** During all phases of the project, keep equipment and vehicles within the limits of the previously disturbed areas of the project site.	Less than Significant with Mitigation incorporated
Geology and Soils	**Mitigation Measure GEO-7:** All workers shall be educated on the consequences of unauthorized collection or sale of fossils.	Less than Significant with Mitigation incorporated
Noise	**Mitigation Measure NOI-1:** The project applicant shall reduce operational noise levels from the project's heat recovery unit and condensers to not exceed San Mateo County Code of Ordinances' daytime exterior and interior noise limits contained in Section 4.88.330, which states that during the daytime hours (7 a.m. to 10 p.m.), operational noise levels shall not exceed an exterior noise level of 55 dBA Leq or an interior noise level 45 dBA Leq. The project shall achieve consistency with the noise limits by one or more of the following measures: ▪ Installation of an eight-foot-tall solid barrier on the southern property boundary where it abuts single-family residential properties. The barriers/enclosures shall be constructed of a material with a minimum weight of 4 pounds per square foot with no gaps of perforations to the east, west, or south. Noise barriers may be constructed of, but are not limited to, masonry block, concrete panels, 1/8 inch thick steel sheets, 1-1/2-inch wood fencing, or 1/4 inch glass panels. If wood is used as the primary barrier component, the fence boards must overlap or be of "tongue and groove" construction with a joining compound between the boards to ensure there	Less than Significant with Mitigation incorporated

Table 1 Summary of Mitigation Measures		
Environmental Factor	***Mitigation Measures***	***Level of Environmental Impact***
	would be gaps or holes in the fence; and annual inspection and maintenance must be conducted for the life of the project to ensure the barrier continues to perform to the minimum requirements; and/or ▪ Use of quieter equipment than analyzed; and/or ▪ Move the equipment to a different part of the project site, further from the residences to the south. Examples include moving the heat recovery unit and condensers to the rooftop. These measures may be combined to achieve noise limit compliance (e.g., a six-foot barrier and moving the heat recovery unit slightly to the north). Revised site and detail plans implementing the selected measure or combination of measures shall be analyzed by a qualified noise consultant to determine that the project's operational noise levels would be consistent with San Mateo Code of Ordinances' exterior and interior noise limits. This analysis shall be submitted to the County planning department for verification prior to the granting of building permits.	
Tribal Cultural Resources	See **Mitigation Measure CUL-1**	Less than Significant with Mitigation incorporated

4/1/21

King Leong, Capital Projects Manager I
San Mateo County

Date

Exhibit A

San Mateo County

Grant Yard Radio Shop Project

Initial Study

County File No: P30J1

Prepared for:

San Mateo County
555 County Center 5th Floor
Redwood City, CA 94063 (650) 363-4000

Prepared by:

Circlepoint
46 South First Street
San Jose, CA 95113

February 2021

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INITIAL STUDY AND ENVIRONMENTAL CHECKLIST FORM

CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

1. Project Title	Grant Yard Radio Shop Project
2. Lead Agency	San Mateo County 455 County Center Redwood City, CA 94063
3. Contact Person and Phone Number	King Leong, Capital Projects Manager I Telephone: (650) 208-9855 E-Mail: kleong1@smcgov.org
4. Project Location	752 Chestnut Street Redwood City, CA 94063
5. San Mateo County Parcel Number	APN 054-063-180
6. Project Sponsor's Name and Address	San Mateo County Department of Public Works 555 County Center, 5th Floor Redwood City, CA 94063
7. General Plan Designation	Residential – High Density
8. Zoning	Industrial Restricted (IR)
9. Description of Project	See Project Description below
10. Surrounding Land Uses and Setting	Commercial-Office and Mixed-Use (north), R-4 Residential – Medium Density (west), R-3 Residential – Low Density (south and east)

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "potentially significant impact" as indicated by the checklist on the following pages.

- ☐ Aesthetics
- ☐ Agriculture and Forestry Resources
- ☐ Air Quality
- ☒ Biological Resources
- ☒ Cultural Resources
- ☐ Energy
- ☒ Geology and Soils
- ☐ Greenhouse Gas Emissions
- ☐ Hazards and Hazardous Materials
- ☐ Hydrology and Water Quality
- ☐ Land Use and Planning
- ☐ Mineral Resources
- ☒ Noise
- ☐ Population and Housing
- ☐ Public Services
- ☐ Recreation
- ☐ Transportation
- ☒ Tribal Cultural Resources
- ☐ Utilities and Service Systems
- ☐ Wildfire
- ☒ Mandatory Findings of Significance

DETERMINATION

On the basis of this Initial Study:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

King Leong Date

Capital Projects Manager I, San Mateo County

PROJECT DESCRIPTION

San Mateo County proposes to construct a new 13,000-square foot one-story radio service facility at 752 Chestnut Street. The County is the lead agency and sponsor under the California Environmental Quality Act (CEQA), and questions on the project should be directed to King Leong, Capital Projects Manager I, (650) 208-9855.

PROJECT LOCATION AND SETTING

The project site, which is owned by San Mateo County, encompasses one parcel with an address of 752 Chestnut Street (APN 054-063-180). 752 Chestnut Street is in the eastern portion of Redwood City, San Mateo County, California (**Figure 1 and Figure 2**). The 3.4-acre parcel containing the project site is predominantly flat. The site is accessible via driveways on Chestnut Street and Spring Street. The eastern and southern property lines are adjacent to surrounding development.

The project site is in an established neighborhood that contains a mix of existing land uses. The project site is bordered by a one-story retail building to the east and a single-family residential neighborhood to the south (**Figure 2**). Across Spring Street from the project site are parking areas and an office building, and across from Chestnut Street is a single-family residential neighborhood. State Route (SR-84) is located southeast of the project site, separated by a mix of commercial, single-family residential, and multi-family residential development.

The project site is designated Residential – High Density (40 dwelling units/acre maximum) by the Redwood City General Plan and zoned IR – Industrial Restricted District. The General Plan designation for the area west and south of the project site is Residential – High Density. North of the project site is designated Commercial – Office/Professional, and Mixed Use – Live/Work (20 dwelling units/acre). Areas south, east, and west of the project site are designated Residential – High Density. Zoning is generally similar to the General Plan land use designation, with areas to the north zoned Commercial-Office and Mixed-Use, areas to the west zoned R-4 Residential – Medium Density, and areas to the south and east zoned R-3 Residential – Low Density. See **Figure 3** and **Figure 4** for land use designations and zoning for the project site and surrounding area.

Figure 1 **Project Location Map**

Figure 2 **Project Site Map**

Figure 3 **Downtown Specific Plan Land Use Map**

Figure 4 **Zoning Map**

Project Background

There are five buildings on the parcel containing the project site, including the County of San Mateo County Grant Corporation Yard (Grant Corporation Yard). Operations of the Grant Corporation Yard include equipment maintenance and repair of County-owned larger trucks, vehicles, and equipment, indoor and outdoor vehicle, material, and equipment storage areas, refuse dumping and refueling areas, and incidental offices use. Authorized County employees may obtain larger, commercial sized vehicles (such as haul trucks or other construction-related vehicles) as needed. Hazardous material storage and handling areas are located on-site.

The County's prior radio service facility, which was demolished as part of a separate project, was located at 1320 Marshall Street, approximately 0.5 mile south of the current project site. Operation of the 1320 Marshal Street radio service facility included monitoring of communication on all County two-way radios, equipment storage, and repair of County radio equipment on an as-needed basis.

PROJECT CHARACTERISTICS

As shown in **Figure 5** and **Figure 6**, the project would replace the existing 2,700 square-foot one-story building used for County pest control services along the western property line with a new 13,000 square-foot two-story radio service facility. The new building would contain both office space and a service garage to work on County vehicles and radio equipment. Condensers and a heat recovering unit would be located on the east side of the new building. An emergency generator would be located east of the new building near the southern property line. Operation of the project would be similar to that of the prior radio service facility and would include monitoring of communication on all County two-way radios, equipment storage, and repair of County radio equipment on an as-needed basis.

The project would also include two electric vehicle (EV) charging stalls, one clean air vehicle space and seven bicycle parking spaces. Up to 75 percent of the project's parking spaces would be covered. The new building will be designed to meet the requirements of LEED Silver green building certification.

All other existing uses currently conducted on-site at the Grant Corporation Yard including office, outdoor and indoor storage and vehicle and equipment storage, maintenance, and repair, would continue to operate at existing capacities under the proposed project. No new curb cuts are proposed.

Grading required for the project would be designed to conform to the existing site as closely as possible and excavation would be minimal; no basement level or pile driving are proposed as part of the project. The amount of grading planned is the minimum required to allow for the construction of a level building pad, in conformance with current Building Codes. The maximum depth of excavation activities would be approximately 8 to 10 feet, where the depth to groundwater is approximately 13 to 15 feet below ground surface (bgs). The entire volume of material to be excavated would primarily be exported off-site. No significant import or export of soil or engineered fill material is anticipated.

Trees and Landscaping

No trees would be removed. Some weedy ground cover would be removed to accommodate construction of the new radio service building. New drainage infrastructure is proposed with the intention of maintaining the existing flows and direction of stormwater runoff. The project would include new landscaping with recycled wood chips in all newly landscaped areas.

CONSTRUCTION

Project construction would begin in Spring 2021 and conclude in Summer 2022 with a total duration of approximately 15 months. Construction would be completed in one phase, and would include typical activities such as site grading, excavation for building foundations, concrete work, framing, and interior and exterior architectural coatings. Typical construction equipment such as backhoes, heavy duty trucks, and excavators would be used at the project site. No pile driving is anticipated. Construction would require removal of approximately 1,650 cubic yards (cy) of demolition material and excavated soil (cut) from the site and import of 400 cy of fill material.

APPROVALS

The project site is in Redwood City. However, as the County is a governmental entity serving as both property owner and project sponsor, the County itself is the jurisdictional agency to issue permits and approvals for the project. The project is therefore exempt from permitting and development regulation requirements of Redwood City. No other permits or approvals would be required.

Figure 5 **Project Site Plan**

Figure 6 **Southern Elevation**

ENVIRONMENTAL IMPACT CHECKLIST

1 Aesthetics

Issues *Except as provided in Public Resources Code Section 21099, would the project:*	Significant or Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less than Significant	No Impact
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?	☐	☐	☐	☒
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (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?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Setting

The project site is located in Redwood City, within San Mateo County, east of the Santa Cruz Mountains and southwest of the San Francisco Bay (Bay). There are five existing buildings on the parcel containing the project site, including the Grant Corporation Yard and a 2,700 square-foot one-story building used for County pest control services along the western property line. The area surrounding the project site is fully developed. Redwood City is surrounded by the City of San Carlos to the northwest, the Bay to the northeast, and the City of Atherton to the southeast. Most of Redwood City is located on gently sloping valley floor and is a highly developed, urban/suburban area.

Scenic Vistas

According to the Redwood City General Plan EIR, there are scenic vistas of the Santa Cruz Mountain range in the southern and western portions of Redwood City, particularly visible from the elevated hillside neighborhoods. Public views of scenic resources, including the Bay and its associated baylands, sloughs, and marshes, and the urbanized Bay Peninsula, are primarily limited to the elevated hillsides. Scenic vistas are not visible from the project site because the surrounding development blocks long-range views. The Santa Cruz Mountain ridgeline is barely visible from the project site, as the mountains are obscured by surrounding buildings.

Scenic Highways

The intent of the California Scenic Highway Program is to protect and enhance California's natural beauty and to protect the social and economic values provided by the State's scenic resources. State scenic highways are officially designated by Scenic Highways Advisory Committee. According to the Redwood City General Plan Scenic Roads and Highways Element, Redwood City does not contain any officially designated or eligible State scenic highways. Additionally, the project site is not located within a historic district and does not contain a known historic property within its limits.

Scenic viewsheds are also important factors to consider when analyzing the aesthetic character of a project site. While a scenic vista is typically a singular scene or view, scenic viewsheds are areas of particular scenic or historic value deemed worthy of preservation against development and other changes. According to the Redwood City General Plan, the project site is not located within or near any scenic viewsheds. The California Department of Transportation (Caltrans) Scenic Highway Program has not designated any scenic highways or potentially eligible scenic highways in the project site vicinity.[1,2]

Discussion

a) Have a substantial adverse effect on a scenic vista?

No Impact. As stated above, scenic vistas are not visible from the project site because the surroundings block long-range views. The new radio service facility would be similar in size and scale to existing buildings on the project site and nearby buildings. The project would not alter views of or through the existing site or introduce large structures that could further obstruct the limited views of the distant mountains. Given the above, no impact to a scenic vista would occur.

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

No Impact. There are no scenic resources, State scenic highways, or historic resources on the project site or in its vicinity, therefore the project would not impact this type of resource. There are no rock outcroppings or designated visual resources on the project site; therefore, implementation of the project would not damage such resources. Implementation of the project would not result in the removal of any trees. Therefore, no impact would occur.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized

[1] California Department of Transportation. California Scenic Highway Mapping System. Available: https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways . Accessed: January 2021.
[2] San Mateo County, *San Mateo County Scenic Corridors Map*. Available: http://planning.smcgov.org/documents/san-mateo-county-scenic-corridors. Accessed: January 2021.

area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less than Significant. The project site is located in an urbanized area and does not have the potential to degrade the existing visual character or quality of a public viewshed. The project would be consistent with existing zoning for the project site, which is zoned as Industrial Restricted District. The services associated with the project would be similar to the industrial activities that currently occur on the site. After implementation of the project, the project site would be visually consistent within the larger urban context of the existing Grant Corporation Yard as well as residential and commercial buildings surrounding the site. Therefore, this impact would be less than significant.

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

Less than Significant. The project would include new and/or modified outdoor light fixtures to support operation of the new radio service facility. All lighting would be consistent with the California Energy Commission's 2019 Standards to improve the quality of outdoor lighting and help reduce the impacts of light pollution, light trespass, and glare to the surrounding area. Further, vehicles visiting the new radio service facility would do so during normal business hours and would be accommodated within the garage, limiting the amount of light and glare from automobiles on the project site. Therefore, this impact would be less than significant, and no mitigation is required.

2 Agriculture and Forestry Resources

Issues *Would the project:*	Significant or Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less than Significant	No Impact
a) 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?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning 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 zones Timberland Projection (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land of conversion of forest land to non-forest use?	☐	☐	☐	☒
e) 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?	☐	☐	☐	☒

Setting

The California Department of Conservation administers the Farmland Mapping and Monitoring Program (FMMP), California's statewide agricultural land inventory. Four classifications of farmland are considered valuable: Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance. Any conversion of land within these classifications is typically considered an environmental impact under CEQA. Other categories of land that are not protected by the Department of Conservation include Grazing Land, Urban and Built-up Land, and Other Land.

The project site is designated as Urban and Built-up Land by the FMMP.[3] The FMMP defines the Urban and Built-up Land category as land used for industrial and commercial purposes, golf courses, landfills, airports, sewage treatment, and water control structures.

[3] California Department of Conservation, Division of Land Resource Protection. Farmland Mapping & Monitoring Program. Available: https://maps.conservation.ca.gov/DLRP/CIFF/. Accessed: January 2021.

There is no FMMP designated Important, Unique, or Prime Farmland, and no land protected under the Williamson Act in the vicinity of the project.[4] There are no agricultural resources located on or near the project site. There is no forest land on or near the project site, as the project site is located within and surrounded by urban and built-up land.

According to California Public Resources Code (PRC) Section 12220(g), forest land is land that can support 10 percent native tree cover of any species under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits. California PRC Section 4526 defines timberland as land that is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees. Land owned by the federal government and land designated by the State Board of Forestry and Fire Protection as experimental forest land is excluded as timberland.

Discussion

a) 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?

and

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

and

c) Conflict with existing zoning for, or cause rezoning 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 zones Timberland Projection (as defined by Government Code section 51104(g))?

and

d) Result in the loss of forest land of conversion of forest land to non-forest use?

and

e) 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?

No Impact. As stated above, there are no agricultural lands, lands under a Williamson Act contract, forest lands, or timberlands on or adjacent to the project site. The project site is not designated for agricultural or forest uses in the Redwood City General Plan Land Use Map;

[4] Department of Conservation. Williamson Act/Land Conservation Act, 2016. Available: https://www.conservation.ca.gov/dlrp/wa. Accessed: January 2021.

therefore, the project would not conflict with existing zoning for agricultural or forest uses. Consequently, the project would not result in farmland or forest land conversion. Therefore, no impact would occur.

3 Air Quality

Issues *Would the project:*	Significant or Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less than Significant	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
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.	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?	☐	☐	☒	☐

Setting

Rincon Consultants prepared an Air Quality and Greenhouse Gas Study for the project in 2020 to analyze the project's potential air quality impacts (**Appendix A**).

The project site is located in the San Francisco Bay Area Air Basin (SFBAAB), which is under the jurisdiction of the Bay Area Air Quality Management District (BAAQMD). As the local air quality management agency, BAAQMD is required to monitor air pollutant levels to ensure that State and federal air quality standards are met and, if they are not met, to develop strategies to meet the standards.

Air pollutant emissions in the SFBAAB are generated by both stationary and mobile sources. Stationary sources can be divided into two major subcategories: point and area sources. Point sources occur at a specific location and are often identified by an exhaust vent or stack. Examples include boilers or combustion equipment that produce electricity or generate heat. Area sources are distributed widely and include those such as residential and commercial water heaters, painting operations, lawn mowers, agricultural fields, landfills, and some consumer products. Mobile sources refer to emissions from motor vehicles, including tailpipe and evaporative emissions, and are classified as either on-road or off-road. On-road sources may be operated legally on roadways and highways. Off-road sources include aircraft, ships, trains, and self-propelled construction equipment. Air pollutants can also be generated by the natural environment such as when high winds suspend fine dust particles.

Air Pollutants of Primary Concern

The federal and State governments have established ambient air quality standards for the protection of public health. The U.S. Environmental Protection Agency (EPA) is the federal agency designated to administer air quality regulation, while the California Air Resources Board (CARB) is the State equivalent within the California EPA. County-level Air Quality Management Districts (AQMDs) provide local management of air quality. CARB has established air quality standards and is responsible for the control of mobile emission sources, while the local AQMDs are responsible for enforcing standards and regulating stationary sources. CARB has established 15 air basins Statewide, including the SFBAAB.

The U.S. EPA has set primary national ambient air quality standards for ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), particulate matter (PM) with a diameter of up to 10 microns (PM_{10}) and up to 2.5 microns ($PM_{2.5}$), and lead (Pb). Primary standards are those levels of air quality deemed necessary, with an adequate margin of safety, to protect public health. In addition, California has established health-based ambient air quality standards for these and other pollutants, some of which are more stringent than the federal standards. **Table 1** lists the current federal and State standards for regulated pollutants.

BAAQMD is the designated air quality control agency in the SFBAAB. The SFBAAB is in nonattainment for the federal standards for O_3 and $PM_{2.5}$ and in nonattainment for the State standard for O_3, $PM_{2.5}$, and PM_{10}. Characteristics of O_3 and suspended particulate matter are described below.

Table 1 Federal and State Ambient Air Quality Standards

Pollutant	Federal Standard	California Standard
Ozone	0.070 ppm (8-hr avg)	0.09 ppm (1-hr avg) 0.070 ppm (8-hr avg)
Carbon Monoxide	35.0 ppm (1-hr avg) 9.0 ppm (8-hr avg)	20.0 ppm (1-hr avg) 9.0 ppm (8-hr avg)
Nitrogen Dioxide	0.100 ppm (1-hr avg) 0.053 ppm (annual avg)	0.18 ppm (1-hr avg) 0.030 ppm (annual avg)
Sulfur Dioxide	0.075 ppm (1-hr avg) 0.5 ppm (3-hr avg) 0.14 ppm (24-hr avg) 0.030 ppm (annual avg)	0.25 ppm (1-hr avg) 0.04 ppm (24-hr avg)
Lead	0.15 μg/m^3 (rolling 3-month avg)	1.5 μg/m^3 (30-day avg)

Pollutant	Federal Standard	California Standard
	1.5 μg/m^3 (calendar quarter)	
Particulate Matter (PM_{10})	150 μg/m^3 (24-hr avg)	50 μg/m^3 (24-hr avg) 20 μg/m^3 (annual avg)
Particulate Matter ($PM_{2.5}$)	35 μg/m^3 (24-hr avg) 12 μg/m^3 (annual avg)	12 μg/m^3 (annual avg)
Visibility-Reducing Particles	No Federal Standards	Extinction coefficient of 0.23 per kilometer – visibility of ten miles or more (0.07 - 30 miles or more for Lake Tahoe) due to particles when relative humidity is less than 70 percent. Method: Beta Attenuation and Transmittance through Filter Tape. (8-hr avg)
Sulfates	No Federal Standards	25 μg/m^3 (24-hr avg)
Hydrogen Sulfide	No Federal Standards	0.03 ppm (1-hr avg)
Vinyl Chloride	No Federal Standards	0.01 ppm (24-hr avg)

Notes: ppm= parts per million; μg/m^3 = micrograms per cubic meter
Source: Rincon Consultants, 2020

Carbon Monoxide

CO is a local pollutant that is found in high concentrations only near fuel combustion equipment and other sources of CO. The primary source of CO, a colorless, odorless, poisonous gas, is automobile traffic. Therefore, elevated concentrations are usually only found near areas of high traffic volumes. CO's health effects are related to its affinity for hemoglobin in the blood. At high concentrations, CO reduces the amount of oxygen in the blood, causing heart difficulty in people with chronic diseases, reduced lung capacity, and impaired mental abilities.

Nitrogen Dioxide

NO_2 is a by-product of fuel combustion, with the primary source being motor vehicles and industrial boilers and furnaces. The principal form of nitrogen oxide produced by combustion is nitric oxide (NO), but NO reacts rapidly to form NO_2, creating the mixture of NO and NO_2 commonly called nitrogen oxides or NO_X. NO_2 is an acute irritant. A relationship between NO_2 and chronic pulmonary fibrosis may exist, and an increase in bronchitis in young children at concentrations below 0.3 parts per million (ppm) may occur. NO_2 absorbs blue light, gives a reddish-brown cast to the atmosphere, and reduces visibility. It can also contribute to the formation of ozone/smog and acid rain.

Ozone

O_3 is produced by a photochemical reaction (triggered by sunlight) between NO_X and volatile organic compounds (VOC). NO_X are formed during the combustion of fuels, while VOC are formed during combustion and evaporation of organic solvents. Because O_3 requires sunlight to form, it usually occurs in substantial concentrations between the months of April and October. O_3 is a pungent, colorless, toxic gas with direct health effects on humans including respiratory and eye irritation and possible changes in lung functions. Groups most sensitive to O_3 include children, the elderly, people with respiratory disorders, and people who exercise strenuously outdoors.

Suspended Particulates

Atmospheric particulate matter is comprised of finely divided solids and liquids such as dust, soot, aerosols, fumes, and mists. The particulates that are of particular concern are PM_{10} (small particulate matter which measures no more than 10 microns in diameter) and $PM_{2.5}$ (fine particulate matter which measures no more than 2.5 microns in diameter). The characteristics, sources, and potential health effects associated with PM_{10} and $PM_{2.5}$ can be different. Major man-made sources of PM_{10} are agricultural operations, industrial processes, combustion of fossil fuels, construction, demolition operations, and entrainment of road dust into the atmosphere. Natural sources include windblown dust, wildfire smoke, and sea spray salt. The finer $PM_{2.5}$ particulates are generally associated with combustion processes as well as formation in the atmosphere as a secondary pollutant through chemical reactions. $PM_{2.5}$ is more likely to penetrate deeply into the lungs and poses a serious health threat to all groups, but particularly to the elderly, children, and those with respiratory problems. More than half of the small and fine particulate matter that is inhaled into the lungs remains there, which can cause permanent lung damage. These materials can damage health by interfering with the body's mechanisms for clearing the respiratory tract or by acting as carriers of an absorbed toxic substance.

Lead

Pb is a metal found naturally in the environment, as well as in manufacturing products. Pb occurs in the atmosphere as particulate matter. The major sources of Pb emissions historically have been mobile and industrial sources. In the early 1970s, the U.S. EPA set national regulations to gradually reduce the Pb content in gasoline. In 1975, unleaded gasoline was introduced for motor vehicles equipped with catalytic converters. The U.S. EPA completed the ban prohibiting the use of leaded gasoline in highway vehicles in December 1995. As a result of the U.S. EPA's regulatory efforts to remove lead from gasoline, atmospheric lead concentrations have declined substantially over the past several decades. The most dramatic reductions in Pb emissions occurred prior to 1990 due to the removal of Pb from gasoline sold for most highway vehicles. Pb emissions were further reduced substantially between 1990 and 2008, with reductions occurring in the metals industries in part due to national emissions standards for hazardous air pollutants. As a result of phasing out leaded gasoline, metal processing is currently the primary source of Pb emissions. The highest levels of Pb in the air are generally found near lead smelters. Other stationary sources include waste incinerators, utilities, and lead-acid

battery manufacturers. Lead may cause a range of health effects, including anemia, kidney disease, and neuromuscular and neurological dysfunction (in severe cases).

Toxic Air Contaminants

Toxic air contaminants (TACs) are a diverse group of air pollutants that may cause or contribute to an increase in deaths or serious illness or that may pose a present or potential hazard to human health. TACs include both organic and inorganic chemical substances that may be emitted from a variety of common sources, including gasoline stations, motor vehicles, dry cleaners, industrial operations, painting operations, and research and teaching facilities. One of the main sources of TACs in California is diesel engines that emit exhaust containing solid material known as diesel particulate matter (DPM). TACs are different than the criteria pollutants previously discussed because ambient air quality standards have not been established for TACs. TACs occurring at extremely low levels may still cause health effects, and it is typically difficult to identify levels of exposure that do not produce adverse health effects. TAC impacts are described by carcinogenic risk and by chronic (i.e., of long duration) and acute (i.e., severe but of short duration) adverse effects on human health.

Bay Area Quality Management Plan

BAAQMD is the agency primarily responsible for assuring national and State ambient air quality standards are attained and maintained in the SFBAAB. BAAQMD is also responsible for adopting and enforcing rules and regulations concerning air pollutant sources, issuing permits for stationary sources of air pollutants, inspecting stationary sources of air pollutants, responding to citizen complaints, monitoring ambient air quality and meteorological conditions, awarding grants to reduce motor vehicle emissions, and conducting public education campaigns, as well as many other activities. BAAQMD has jurisdiction over much of the nine-county Bay Area, including the southern portion of Sonoma County and western portion of Solano County.[5]

Sensitive Receptors

Ambient air quality standards have been established to represent the levels of air quality considered sufficient, with an adequate margin of safety, to protect public health and welfare. They are designed to protect people most susceptible to respiratory distress, such as children under 14; persons over 65; persons engaged in strenuous work or exercise; and people with cardiovascular and chronic respiratory diseases. The majority of sensitive receptor locations are therefore residences, schools, and hospitals. The sensitive receptors nearest to the project site are the adjacent residences west and south of the project site. The project would also place a new sensitive receptor on the project site: residents of the proposed multi-family building.

BAAQMD Significance Thresholds

BAAQMD recommends that lead agencies determine appropriate air quality emissions thresholds of significance based on substantial evidence in the record. BAAQMD developed

[5] Bay Area Air Quality Management District, *BAAQMD CEQA Air Quality Guidelines*, 2017.Available: https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en. Accessed: January 2021.

screening criteria in the May 2017 CEQA Air Quality Guidelines to provide lead agencies and project applicants with a conservative indication of whether a project could result in potentially significant air quality impacts. **Table 2** shows the significance thresholds for criteria air pollutant and precursor emissions being used for the purposes of this analysis. These thresholds represent the levels at which a project's individual emissions of criteria air pollutants or precursors would result in a cumulatively considerable contribution to the SFBAAB's existing air quality conditions. For the purposes of this analysis, the project would result in a significant impact if construction or operational emissions would exceed thresholds as shown below.

Table 2 BAAQMD Air Quality Significance Thresholds

Pollutant/Precursor	Construction Emissions (average lbs./day)[1]	Operational Emissions (average lbs./day)
ROG	54	54
NO_X	54	54
PM_{10}	82 (exhaust)	82
$PM_{2.5}$	54 (exhaust)	54

[1] Note the thresholds for PM_{10} and $PM_{2.5}$ apply to construction exhaust emissions only.
Notes: lbs./day = pounds per day; NO_X = oxides of nitrogen; $PM_{2.5}$ = fine particulate matter with an aerodynamic resistance diameter of 2.5 micrometers or less; PM_{10} = respirable particulate matter with an aerodynamic resistance diameter of 10 micrometers or less; ROG = reactive organic gases
Source: Rincon Consultants, 2020

California Clean Air Act

The California Clean Air Act requires air districts to create a Clean Air Plan that describes how the jurisdiction will meet air quality standards. These plans must be updated every three years. The most recently adopted air quality plan for the SFBAAB is BAAQMD's 2017 Clean Air Plan (2017 Plan). To fulfill State O_3 planning requirements, the 2017 Plan includes all feasible measures to reduce emissions of O_3 precursors (ROG and NOX) and reduce the transport of O_3 and its precursors to neighboring air basins. In addition, the 2017 Plan builds upon and enhances BAAQMD's efforts to reduce emissions of $PM_{2.5}$ and TACs. The 2017 Plan does not include control measures that apply directly to individual development projects. Instead, the control strategy includes measures related to stationary sources, transportation, energy, buildings, agriculture, natural and working lands, waste management, water, and super-greenhouse gas pollutants (BAAQMD 2017b).

The 2017 Plan focuses on two primary goals:

- Protect air quality and health at the regional and local scale by attaining all State and national air quality standards and eliminating disparities among Bay Area communities in cancer health risk from TACs; and
- Protect the climate by reducing Bay Area GHG emissions to 40 percent below 1990 levels by 2030, and 80 percent below 1990 levels by 2050.

Under BAAQMD's methodology, a determination of consistency with the 2017 Plan should demonstrate that a project:

- Supports the primary goals of the 2017 Plan;
- Includes applicable control measures from the 2017 Plan; and
- Would not disrupt or hinder implementation of any control measures in the 2017 Plan.

Discussion

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

Less than Significant. A project that would not support the 2017 Plan's goals would not be considered consistent with the 2017 Plan. On an individual project basis, consistency with BAAQMD's quantitative thresholds is interpreted as demonstrating support for the 2017 Plan's goals. As noted below under questions "b" and "c", the project would not result in exceedances of BAAQMD's thresholds for criteria air pollutants and thus would not conflict with the 2017 Plan's goal to attain air quality standards. In addition, the project includes features that are consistent with these goals and measures, including being an infill, redevelopment project; meeting California Green Building Standards; meeting LEED Silver-level certification; and providing seven bicycle parking spaces. Therefore, the project would not conflict with or obstruct the implementation of an applicable air quality plan and this impact would be less than significant.

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.

Less than Significant. As detailed below, construction and operational emissions would be less than significant.

Construction Emissions

Project construction would involve demolition, site preparation, grading, building construction, paving, and architectural coating activities that have the potential to generate air pollutant emissions. **Table 3** summarizes the estimated maximum daily emissions of ROG, NOX, PM_{10}, and $PM_{2.5}$ during project construction. As shown in **Table 3**, project construction emissions for all criteria pollutants would be below BAAQMD's average daily thresholds of significance.

Table 3 Project Construction Emissions

	Average Daily Emissions (lbs./day)					
	ROG	NO_X	CO	PM_{10} (exhaust)	$PM_{2.5}$ (exhaust)	SO_X
Maximum Daily Emissions	2.6	14.7	16.6	0.8	0.7	<0.1
BAAQMD Thresholds (average daily emissions)	54	54	N/A	82	54	N/A
Threshold Exceeded?	**No**	**No**	**N/A**	**No**	**No**	**N/A**

N/A = not applicable; no BAAQMD threshold for CO or SO_X
Source: Rincon Consultants, 2020

Fugitive Dust

Site preparation and grading may cause wind-blown dust that could contribute particulate matter into the local atmosphere. BAAQMD has not established a quantitative threshold for fugitive dust emissions but rather states that projects that incorporate best management practices (BMPs) for fugitive dust control during construction would have a less than significant impact related to fugitive dust emissions. The project includes implementation of these BMPs that are included in all County projects, such as watering twice per day, as discussed in BAAQMD Significance Thresholds above in the Air Quality Setting.

Operational Emissions

Long-term emissions associated with project operation are shown in **Table 4**. Emissions would not exceed BAAQMD daily thresholds for any criteria pollutant. Since project emissions would not exceed BAAQMD thresholds for construction or operation, the project would not violate an air quality standard or result in a cumulatively considerable net increase in criteria pollutants, and impacts would be less than significant.

Table 4 Project Operational Average Daily Emissions

	Average Daily Emissions (lbs./day)					
Sources	**ROG**	**NO_X**	**CO**	**PM_{10}**	**$PM_{2.5}$**	**SO_X**
Area	0.3	<0.1	<0.1	<0.1	<0.1	<0.1
Energy	<0.1	0.1	0.1	<0.1	<0.1	<0.1
Mobile[1]	0.0	0.0	0.0	0.0	0.0	0.0
Total Project Emissions	**0.3**	**0.1**	**0.1**	**<0.1**	**<0.1**	**<0.1**

Sources	Average Daily Emissions (lbs./day)					
	ROG	NO_X	CO	PM_{10}	$PM_{2.5}$	SO_X
BAAQMD Thresholds	54	54	N/A	82	54	N/A
Threshold Exceeded?	No	No	N/A	No	No	N/A

[1] Project would reduce vehicle trips compared to existing conditions. There would be no mobile emissions
N/A = not applicable; no BAAQMD threshold for CO or SO_X
Source: Rincon Consultants, 2020

c) Expose sensitive receptors to substantial pollutant concentrations?

Less than Significant. As detailed below, this impact would be less than significant.

Carbon Monoxide Hotspots

A CO hotspot is a localized concentration of CO that is above a CO ambient air quality standard. Localized CO hotspots can occur at intersections with heavy peak hour traffic. Specifically, hotspots can be created at intersections where traffic levels are sufficiently high such that the local CO concentration exceeds the federal one-hour standard of 35.0 ppm or the federal and State eight-hour standard of 9.0 ppm.

The project would include a 13,000-square feet radio service facility. While the County expects daily trips to and from the project site to decrease with implementation of the project, this analysis assumes that there would be no change in the number of daily trips generated by uses on the project site to be conservative. In either case, the screening thresholds would not be exceeded, and the impact of localized CO emissions would be less than significant.

Toxic Air Contaminants

Construction

Construction-related activities would result in temporary project-generated DPM exhaust emissions from off-road, heavy-duty diesel equipment for site preparation, grading, building construction, and other construction activities. DPM was identified as a TAC by CARB in 1998.

Generation of DPM from construction projects typically occurs in a single area for a short period. Construction of the proposed project would occur over approximately 15 months. According to the Office of Environmental Health Hazard Assessment, health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 70-year exposure period. However, such assessments should be limited to the period/duration of activities associated with the project. Thus, the duration of proposed construction activities (i.e., 15 months) is approximately 2 percent of the total exposure period used for health risk calculation. Therefore, this analysis qualitatively discusses potential health risks associated with construction-related emissions of TACs, focusing on construction activities most likely to generate substantial TAC emissions and the duration of such activities relative to established, longer-term health risk exposure periods.

The maximum PM_{10} and $PM_{2.5}$ emissions would occur during site preparation and grading activities. These activities would last for approximately two months. Construction-related PM_{10}

and $PM_{2.5}$ emissions would decrease for the remaining construction period because construction activities such as building construction and architectural coating would require less construction equipment. While the maximum DPM emissions associated with site preparation and grading activities would only occur for a portion of the overall construction period, these activities represent the maximum exposure condition for the total construction period. The duration of site preparation and grading activities would represent less than one percent of the total exposure period for a 70-year health risk calculation. Therefore, DPM generated by project construction would not create conditions where the probability is greater than 10 in one million of contracting cancer for the Maximally Exposed Individual or to generate ground-level concentrations of non-carcinogenic TACs that exceed a Hazard Index greater than one for the Maximally Exposed Individual. Therefore, construction-related TAC impacts would be less than significant.

Operational Impacts

The project would include a new permitted stationary source in the form of an emergency generator. The generator would be approximately 200 kilowatt (kW) and powered by a diesel engine. The backup generator was modeled in CalEEMod assuming it would be operational for a maximum of 50 hours per year for testing and maintenance purposes, consistent with BAAQMD guidelines. The predicted PM_{10} exhaust and $PM_{2.5}$ emissions from CalEEMod were then screened using the BAAQMD Risk and Hazards Emission Screening Calculator. Based the screening analysis, the predicted risks and hazards from the backup generator would be below the BAAQMD single-source thresholds as shown in **Table 5**. Therefore, project operational impacts would be less than significant.

Table 5 Project Backup Generator Screened Health Risks and Hazards

Description	Cancer Risk (per million)	$PM_{2.5}$ Concentration (µg/m3)	Increased Non-Cancer Risk (Chronic Hazard Index)
200 kW (268 HP) Backup Diesel Generator[1]	2.3	<0.01	<0.01
BAAQMD Individual Source Screening Threshold	10	0.3	1
Individual Source Threshold Exceeded?	No	No	No

[1]Risk and hazard values from the backup generator are not adjusted for distance
Source: Rincon Consultants, 2020

The project would be located near existing stationary sources of TACs such as the Bristol-Myers Squibb research facility located immediately north of the project site across Spring Street. Additionally, major roadways such as Middlefield Road and State Route 84 are located within 1,000 feet of the project site and could cause health risks related to TAC emissions. Despite, the project's proximity to two major roadways and permitted stationary sources, the project would not expose sensitive populations to substantial pollutant concentrations from either TAC source. The proposed radio service facility project is not defined by CARB as a sensitive land use, which

includes residences, schools and school yards, parks and playgrounds, daycare centers, nursing homes, and medical facilities. Furthermore, because the project would not introduce new sensitive receptors to the project site, there would be no potential cumulative impact on future receptors, and cumulative impacts would be less than significant.

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

Less than Significant. The project would generate oil and diesel fuel odors during construction from equipment use as well as odors related to asphalt paving. Odors would be limited to the construction period and would be temporary. With respect to operation, BAAQMD's CEQA Air Quality Guidelines (2017) identify land uses associated with odor complaints (see **Table 6**). A radio service facility is not identified on this list, nor are any similar uses. Therefore, the project would not generate objectionable odors affecting a substantial number of people, and impacts would be less than significant.

Table 6 BAAQMD Odor Source Thresholds

Odor Source	Minimum Distance for Less than Significant Odor Impacts (in miles)
Wastewater treatment plant	2
Wastewater pumping facilities	1
Sanitary Landfill	2
Transfer Station	1
Composting Facility	1
Petroleum Refinery	2
Asphalt Batch Plant	2
Chemical Manufacturing	2
Fiberglass Manufacturing	1
Painting/Coating Operations	1
Rendering Plant	2

Source: Rincon Consultants, 2020

4 Biological Resources

Issues *Would the project:*	Significant or Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less than Significant	No Impact
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 Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) or State-protected wetlands, through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Setting

A Biological Resources Technical Memorandum was completed by H.T. Harvey & Associates in November 2014 for the purpose of evaluating the potential biological constraints related to the project. The findings of this Technical Memorandum were reviewed and confirmed by H.T. Harvey & Associates in November 2020 (see **Appendix B**).

The project site is entirely within a fully developed, human-altered landscape that contains large amounts of paved surfaces and associated ruderal or landscaped habitats. The project site does

not support any sensitive habitat types tracked by the California Natural Diversity Database (CNDDB).

Existing vegetation present on the project site primarily includes non-native species such as the Canary Island date palm tree, acacia (*Acacia sp.*) tree, eucalyptus tree, firethorn (*Pyracantha sp.*), nightshade (*Solanum sp.*), rosemary (*Rosemarinus officialis*), and huckleberry (*Vaccinium sp.*), as well as two native tree species: coast redwood and California sycamore (*Platanus racemosa*). The vegetation present is located primarily around the perimeter of the project site, particularly near the west entrance on Chestnut Street, and was planted as landscaping.

Due to the relatively low amounts of vegetation on site and the urban context, the possibility of wildlife habitat is considered to be unlikely. Generally, wildlife habitats in developed urban areas such as the project site are low in species diversity. Species that may use the project site would be predominantly urban adapted birds, such as rock doves, mourning doves, mockingbirds, house sparrows, and finches. Raptors (birds of prey) and other urban birds could use trees on the project site for nesting or as a roost. Raptors and other migratory birds are protected by the Federal Migratory Bird Treaty Act (MBTA) (16 U.S.C. Section 703, et seq.).

There is no adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other approved local, regional, or state habitat conservation plans in effect that include the project site.[6]

Methods

To identify potential biological constraints that may need to be addressed during project planning, CEQA review, permitting, and implementation, H. T. Harvey & Associates ecologists reviewed all relevant background information concerning biological resources in the project area, including aerial photos and topographic maps; U.S. Fish and Wildlife Service (USFWS) National Wetland Inventory Maps the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database data for the Redwood Point, San Mateo, Palo Alto, and Woodside U.S. Geological Survey 7.5-minute quadrangles; and other relevant scientific literature, technical databases, and resource agency reports in order to assess the current distribution of special-status plants and wildlife in the project vicinity.[7]

An initial reconnaissance-level field survey of the project area was conducted by H. T. Harvey & Associates on November 6, 2014. A follow-up survey was conducted on November 4, 2020 to confirm the findings of the initial field survey. The area investigated for biotic resources included the project footprint as well as adjacent habitats that could potentially be affected by project activities. The purpose of these surveys was to provide a project-specific impact assessment for development of the proposed project as described above. Specifically, the surveys were conducted to 1) assess existing biotic habitats at the project site, 2) assess the project site for the potential to support special-status species and their habitats, and 3) identify potential jurisdictional habitats such as waters of the U.S./State and riparian habitat.

[6] Santa Clara Valley, 2018. Habitat Agency Browser. Available: http://www.hcpmaps.com/habitat/. Accessed: January 2021.
[7] H. T. Harvey & Associates, 2020. Biological Resources Technical Memorandum.

Discussion

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

Less than Significant with Mitigation Incorporated. As discussed above, existing vegetation present on the project site is located primarily around the perimeter of the project site, particularly near the west entrance on Chestnut Street. Because the site is located in a dense urban landscape, the potential for project-related impacts on special-status species is limited. Further, the focused surveys of the project site found no suitable roosting habitat for bats.

Project construction has the potential to impact non special-status nesting birds, which may nest in shrubs, trees, or on buildings. No trees are proposed for removal; however, some weedy ground cover would be removed to accommodate construction of the new Butler Building. Thus, **Mitigation Measures BIO-1** through **BIO-3** would be implemented to ensure compliance with the MBTA to be conservative during construction activities. Implementation of these measures would reduce impacts to less than significant level.

> **Mitigation Measure BIO-1:** Activities related to the project, including, but not limited to, vegetation removal, ground disturbance, construction, and demolition shall occur outside of the bird breeding season (February 1 through August 31) if feasible. If construction will commence during the breeding season, then a pre-construction nesting bird survey shall be conducted no more than 7 days prior to initiation of ground disturbance and vegetation removal. The nesting bird pre-construction survey shall be conducted within the disturbance footprint and a 300-foot buffer for raptors and 150-foot buffer for passerines where access can be authorized. The survey shall be conducted by a biologist familiar with the identification of avian species known to occur in San Mateo County.
>
> If nests are found, an avoidance buffer (which is dependent upon the species, the proposed work activity, and existing disturbances associated with land uses outside of the site) shall be determined and demarcated by the biologist with bright orange construction fencing, flagging, construction lathe, or other means to mark the boundary. All construction personnel shall be notified as to the existence of the buffer zone and to avoid entering the buffer zone during the nesting season. No ground disturbing activities shall occur within this buffer until the avian biologist has confirmed that breeding/nesting is completed, and the young have fledged the nest. Encroachment into the buffer shall occur only at the discretion of the qualified biologist.
>
> **Mitigation Measure BIO-2:** If it is not possible to schedule project activities between September 1st and January 31st, then pre-construction surveys for nesting birds should be conducted by a qualified ornithologist to ensure that no nests will be disturbed during project implementation. An initial pre-construction survey to determine the likelihood of constraints due to the presence of an active nest should be conducted 14

days prior to the onset of construction activities with a final pre-construction survey conducted no more than 48 hours prior to the initiation of project activities. During this survey, a qualified ornithologist shall inspect all potential nesting habitats (e.g., trees, shrubs, grasslands, and buildings) within 300 feet of the project site for raptor nests and within 100 feet of the project site for nests of non-raptors. If an active nest (i.e., a nest with eggs or young, or any completed raptor nest attended by adults) is found sufficiently close to work areas that would be disturbed by these activities, the ornithologist, in consultation with the CDFW, will determine the extent of a disturbance-free buffer zone to be established around the nest (typically 300 feet for raptors and 100 feet for other species) to ensure that no nests of species protected by the MBTA and California Fish and Game Code will be disturbed during project implementation

Mitigation Measure BIO-3: If project activities will not be initiated until after the start of the nesting season, potential nesting substrate (e.g., bushes, trees, grasses, and other vegetation) that is scheduled to be removed by the project may be removed prior to the start of the nesting season (e.g., prior to January 1st) to reduce the potential for initiation of nests.

With the implementation of the above mitigation measures, the project would have a less-than-significant impact on any MBTA-protected species.

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

No Impact. The project site is entirely within a human-altered urban landscape that contains large amounts of paved surfaces and associated ruderal or landscaped areas. There are no sensitive plant communities (i.e., native grasslands, riparian areas, wetlands) within the project site. Given the lack of riparian habitat and sensitive plant communities within the vicinity of the project site, there would be no impact to these resources.

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

No Impact. Based on a review of aerial imagery, project site photographs and information on biological resources within the project region, no vegetated wetlands or potentially jurisdictional features occur within the project area. Therefore, no impacts to jurisdictional wetlands or waters would occur.

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

No Impact. The project site is entirely within a human-altered urban landscape that contains large amounts of paved surfaces and associated ruderal or landscaped areas. Due to the urban nature of the project site and lack of riparian and other suitable habitat for species, it is unlikely

that the project site is part of a regional wildlife movement corridor. Land use in the vicinity is primarily residential. The area north of the project site is designated Commercial – Office/Professional and is currently occupied by a large Bristol-Myers Squibb research facility. The project area has no connectivity to natural habitats and is therefore not expected to support wildlife movement. Therefore, no impacts to wildlife movement corridors would occur.

e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No Impact. Existing vegetation on the project site includes several ornamental trees. None of the trees qualify as heritage trees or other protected trees. The project would not include or require tree removal.[8]

Therefore, the project would not conflict with local policies and ordinances and no impact would occur.

f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?

No Impact. The project site is not currently covered by an adopted Habitat Conservation Plan (HCP) or any other equivalent plan. Therefore, the project would not conflict with an adopted HCP, Natural Conservation Community Plan, other approved local, regional, or State HCP. No impact would occur.

[8] Redwood City, Code of Ordinances, *Chapter 35 – Tree Preservation*. Available: https://library.municode.com/ca/redwood_city/codes/code_of_ordinances?nodeId=CH35TRPR#TOPTITLE . Accessed: January 2021.

5 Cultural Resources

Issues *Would the project:*	Significant or Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less than Significant	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of a unique archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

Setting

A cultural records search for the project site was conducted through the California Historical Resources Information System (CHRIS) at the Northwest Information Center (NWIC) in November 2014 (see **Appendix C**). The project site has experienced little to no change during since that time and the existing conditions remain essentially the same. Therefore, this records search conducted in 2014 is still relevant to the current project. The results of this records search are discussed below.

Cultural resources are generally defined as traces of human occupation and activity that include prehistoric and historic archaeological sites, districts, and objects; standing historic structures buildings, districts, and objects; and locations of important historic events of sites of traditional and/or cultural importance to various groups. Specifically, the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1 protect the following resources:

> 5024.1(c): A resource may be listed as an historical resource in the California Register if it meets any of the following NRHP criteria:
>
> > (1) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
> >
> > (2) Is associated with the lives of persons important in our past.
> >
> > (3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
> >
> > (4) Has yielded, or may be likely to yield, information important in prehistory or history.

Because the existing building proposed to be demolished is more than 45 years old, the structure meets the minimum age criteria for California Register of Historic Places (CRHP) and

National Register of Historic Places (NRHP) eligibility evaluation.[9] However, per the Redwood City General Plan, the project site does not contain any historic resources, nor is it located near any historic districts.

Discussion

a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

No Impact. The CEQA Guidelines recognize that a significant historic resource is defined as being:

1. Associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. Associated with the lives of persons important in our past;
3. Exemplary of the distinctive characteristics of a type, period, region, or method of construction, or representative of the work of an important creative individual, or possesses high artistic values; or,
4. Likely to yield information important in prehistory or history (State CEQA Guidelines Section 15064.5(a)(3)).

As described above, the CHRIS search completed for the project site concluded that there are no previously documented historic resources on or adjacent to the project site. Per the Redwood City General Plan, the project site is not a historic resource, nor is it located near any historic districts. The nearest historic district designated by the City is the Stambaugh Heller Historic District located southeast of the project site. Because there are no historic resources located near the project site, implementation of the project would not affect surrounding historic resources.

The project would involve demolition of the existing building located in the southwest portion of the project site. The warehouse at 752 Chestnut Street appears to retain historic integrity from when it was constructed in the mid-1940s. The building has not been extensively altered. The building was originally a storage building for a contractor then later part of the Grant Yard owned by San Mateo County. Neither use of the building appears to be associated with significant historical patterns or themes in Redwood City or San Mateo County. The building is not associated with persons of significance in local history and it is a typical and undistinguished example of a warehouse from the 1940s. The building consequently does not appear to be eligible for the California Register because it is not significant under Criteria 1, 2, 3 or 4.

No historic properties listed, determined eligible, or potentially eligible for inclusion on the National Register of Historic Places and/or the California Register of Historical Resources (CRHR) have been identified on or adjacent to the project site. Based on an assessment of the buildings

[9] Per the CEQA Statute and Guidelines, historical resources include properties listed in or formally determined eligible for listing in any local, State, or federal register. All properties formally determined eligible for the NRHP are thereby listed in the California Register and are historical resources pursuant to CEQA.

by an architectural historian, the buildings at the project site that are proposed for demolition are not eligible for the CRHR. Additionally, the NWIC base maps show no recorded buildings or structures within the project site. Therefore, no impact would occur to a historic resource with implementation of the project.

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

Less than Significant with Mitigation Incorporated. No historic archaeological resources have been recorded in or immediately adjacent to the project site. No known prehistoric, ethnographic, or contemporary Native American resources, including villages, sacred places, traditional or contemporary use areas, have been identified in or adjacent to the project site.

No additional resource research or evaluation is recommended prior to project implementation. It is possible that subsurface deposits may exist or that evidence of such resources has been obscured by more recent natural or cultural factors, primarily the extensive rearranging of the landscape and installation of modern features.

Based on a review of historical literature and maps the CHRIS search concluded there is a moderate potential for unrecorded historic-period archaeological resources in the project area. Given the moderate possibility for unrecorded archaeological resources in the proposed project area, this is considered a potentially significant impact. However, implementation of the **Mitigation Measure CUL-1** below would reduce this potentially significant impact to less than significant.

> **Mitigation Measure CUL-1:** In the event Native American or other archaeological resources are encountered during construction, work shall be halted within 100 feet of the discovered materials and workers shall avoid altering the materials and their context until a qualified professional archaeologist has evaluated the situation and provided appropriate recommendations.
>
> If an archaeological site is encountered during any stage of project development, a qualified archaeologist will be consulted to determine whether the resource qualifies as an historical resource or a unique archaeological resource. In the event that it does qualify, the archaeologist will prepare a research design and archaeological data recovery plan to be implemented prior to or during site construction. The archaeologist shall also prepare a written report of the finding, file it with the appropriate agency, and arrange for curation of recovered materials.

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

Less than Significant. As previously discussed, the project site is currently developed, and no known cultural resources are located at the project site. Although unlikely, it is possible that unmarked burials may be unearthed during project construction. In the event that human remains are discovered during construction, the project applicant would comply with the California Health and Safety Code Section 7050.5 regarding human remains, and the California Public Resources Code Section 5097.98 regarding the treatment of Native American human

remains. In the event that human remains are discovered during project construction, all activity within a 50-foot radius of the site shall be halted. The San Mateo County Coroner would be notified and would make a determination as to whether the remains are of Native American origin or whether an investigation into the cause of death is required. If the remains are determined to be Native American, the Coroner will notify the NAHC immediately. Once NAHC identifies the most likely descendants, the descendants will make recommendations regarding proper burial, which will be implemented in accordance with Section 15064.5(e) of the CEQA Guidelines.

With correct implementation of these regulations, potential disturbance of human remains would be protected from direct and indirect impacts from construction. Therefore, project impacts would be less than significant.

6 Energy

Issues *Would the project:*	Significant or Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less than Significant	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Setting

Electricity and Natural Gas

In 2019, California used 277,704 gigawatt-hours (GWh) of electricity, of which 32 percent were from renewable resources. California also consumed approximately 13,158 million U.S. therms (MMthm) of natural gas in 2019. Electricity for the project site would be provided by Peninsula Clean Energy (PCE) through Pacific Gas and Electric (PG&E) infrastructure. Natural gas for the project site would also be provided by PG&E. **Table 7** and **Table 8** show total electricity and natural gas consumption for PG&E's service area as well as consumption by sector. In 2019 PG&E provided approximately 28 percent of the total electricity and approximately 38 percent of the total natural gas usage in California.

Table 7 Electricity Consumption in the PG&E Service Area in 2019

Agriculture and Water Pump	Commercial Building	Commercial Other	Mining and Construction	Residential	Streetlight	Total Usage
4,490	29,560	4,349	9,710	1,642	28,014	78,072

Source: Rincon Consultants, 2020
Note: All usage expressed in GWh (CEC 2019b)

Table 8 Natural Gas Consumption in PG&E Service Area in 2019

Agriculture and Water Pump	Commercial Building	Commercial Other	Mining and Construction	Residential	Streetlight	Total Usage
4,490	29,560	4,349	9,710	1,642	28,014	78,072

Source: Rincon Consultants, 2020
Note: All usage expressed in MMthm (CEC 2019c)

Petroleum

In 2019, approximately 28 percent of the State's energy consumption was used for transportation activities. Californians presently consume over 19 billion gallons of motor vehicle fuels per year. Though California's population and economy are expected to grow, gasoline demand is projected to decline from roughly 15.8 billion gallons in 2017 to between 12.3 billion and 12.7 billion gallons in 2030—a 20 to 22 percent reduction. This forecast decline is due to both increasing use of electric vehicles and improved fuel economy for new gasoline vehicles.

To reduce statewide vehicle emissions, California requires that all motorists use California Reformulated Gasoline, which is sourced almost exclusively from in-state refineries. Gasoline is the most used transportation fuel in California and is used by light-duty cars, pickup trucks, and sport utility vehicles. Diesel is the second most-used fuel in California and is used primarily by heavy duty-trucks, delivery vehicles, buses, trains, ships, boats and barges, farm equipment, and heavy-duty construction and military vehicles. Both gasoline and diesel are primarily petroleum-based, and their consumption releases GHG emissions, including CO_2 and N_2O.

Discussion

a) Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources, during project construction or operations?

Less than Significant. As detailed below, the project would not result in wasteful, inefficient, or unnecessary consumption of energy.

Construction Energy Demand

Construction activity would require energy in the form of petroleum-based fuels used to power off-road construction vehicles and equipment on the project site, construction worker travel to and from the project site, and vehicles used to deliver materials to the site. Electricity usage would be secondary to petroleum-based fuels and would likely be similar to existing usage on the project site. The project would require demolition of existing structures; site preparation and grading, including hauling material off-site; pavement and asphalt installation; building construction; architectural coating; and landscaping and hardscaping.

The total consumption of gasoline and diesel fuel during project construction was estimated using the assumptions and factors from CalEEMod.[10] **Table 9** summarizes the estimated construction energy consumption for the project. Diesel fuel consumption, including construction equipment operation, hauling trips, and vendor trips, would consume an estimated 24,276 gallons of fuel over the project construction period. Worker trips would consume an estimated 1,002 gallons of petroleum fuel during project construction. Refer to **Table 9** for the overall estimated fuel consumption during construction.

[10] 752 Chestnut Street Radio Service Facility Project Energy Analysis, Rincon Consultants 2020.

Table 9 Estimated Fuel Consumption during Construction

Fuel Type	Gallons of Fuel	MMBtu[1]
Diesel Fuel (Construction Equipment)	22,907	2,816
Diesel Fuel (Hauling and Vendor Trips)	1,177	150
Other Petroleum Fuel (Worker Trips)	1,002	110
Total	24,276	3,076

Source: Rincon Consultants, 2020

[1] Million British Thermal Units (MMBtu). The British Thermal Units (BTU) is a measure of the energy content in fuel, and is used in the power, steam generation, heating and air conditioning industries.

The construction energy estimates are conservative because the equipment used in each phase of construction was assumed to be operating every day of construction. Construction equipment would be maintained to applicable standards as required, and construction activity and associated fuel consumption and energy use would be temporary and typical for construction sites. It is also reasonable to assume contractors would avoid wasteful, inefficient, and unnecessary fuel consumption during construction to reduce construction costs. Therefore, the project would not involve the inefficient, wasteful, and unnecessary use of energy during construction.

Operational Energy Demand

Operation of the project would require energy use in the form of electricity and natural gas. Natural gas and electricity would be used for heating and cooling systems, lighting, appliances, water use, and the overall operation of the project.

The project's electricity demand would be served by PG&E, which provided 78,072 GWh of electricity in 2019. Operation of the project would consume approximately 0.2 GWh of electricity per year, which would be less than 0.01 percent of PG&E's current electricity demand. PG&E has adequate capacity to meet this additional need, based on their Energy Efficiency Business Plan.[11] The project's natural gas demand would be serviced by PG&E, which provided approximately 4,942 MMthm per year in 2019. Estimated natural gas consumption for the project would be approximately 0.01 MMthm per year, which would be less than 0.01 percent of PG&E's current natural gas demand (natural gas use provided in the CalEEMod output of Attachment 2). PG&E has adequate capacity to meet this additional need, based on their [plan name]. Therefore, PG&E would have sufficient electricity and natural gas supplies to serve the project. It is important to note that calculated energy consumption estimates did not deduct

[11] Pacific Gas and Electric Company, *Energy Efficiency Business Plan*. Available: https://www.pge.com/pge_global/common/pdfs/for-our-business-partners/energy-efficiency-solicitations/PGE-Energy-Efficiency-Business-Plan.pdf. Accessed: January 2021.

existing energy use from the general light industrial development and therefore represent a highly conservative estimate.

The project would be required to comply with the applicable standards set in California Building Code (CBC) Title 24, which would minimize the wasteful, inefficient, or unnecessary consumption of energy resources during operation. California's Green Building Standards Code (CALGreen; California Code of Regulations, Title 24, Part 11) requires implementation of energy efficient light fixtures and building materials into the design of new construction projects.

Furthermore, the 2019 Building Energy Efficiency Standards (CBC Title 24, Part 6) requires newly constructed buildings to meet energy performance standards set by the Energy Commission. These standards are specifically crafted for new buildings to result in energy efficient performance so that the buildings do not result in wasteful, inefficient, or unnecessary consumption of energy. The standards are updated every three years and each iteration is more energy efficient than the previous standards. For example, according to the CEC, residences built with the 2019 standards will use about seven percent less energy due to energy efficiency measures versus those built under the 2016 standards, or 53 percent less energy with rooftop solar, and nonresidential buildings will use about 30 percent less energy due mainly to lighting upgrades.[12]

In addition, the project would reduce use of nonrenewable energy resources as the electricity generated by renewable resources provided by PCE continues to increase to comply with State requirements through Senate Bill 100 (SB 100). This requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045. This change would be indirect and would happen slowly over time. PCE has a goal of providing 100 percent carbon-free electricity by 2021 and 100 percent renewable energy by 2025. Other energy reducing features of the project include achieving Silver level certification by the United States Green Building Council (USGBC) Leadership in Energy and operational impacts related to energy consumption would be less than significant.

In conclusion, energy demand associated with project construction would be temporary and typical of similar projects, and would not result in the wasteful, inefficient, or unnecessary consumption of energy. While project operation would involve the consumption of natural gas and electricity, it would implement energy saving features and project's energy usage would be in conformance with the latest version of California's Green Building Standards Code and the Building Energy Efficiency Standards. In addition, PG&E has sufficient supplies to serve the project. Therefore, this impact would be less than significant.

[12] California Energy Commission (CEC), *Building Energy Efficiency Standards*, 2019. March. Available at: https://www.energy.ca.gov/title24/2019standards/documents/2018_Title_24_2019_Building_Standards_FAQ.pdf. Accessed January 2021.

b) Would the project conflict or obstruct a State of local plan for renewable energy or energy efficiency?

Less than Significant. As mentioned above, SB 100 mandates 100 percent clean electricity for California by 2045. Since the project would be powered by the existing electricity grid, the project would eventually be powered by renewable energy and would not conflict with this statewide plan. Additionally, the project would be subject to energy efficiency standards pursuant to CCR Title 24 requirements.

The County of San Mateo's 2013 Energy Efficiency Climate Action Plan (CAP) and the 2013 Energy and Climate Change Element of the County's General Plan include energy-related emission-reduction measures.[13,14] The CAP was adopted in June 2013 and only addresses GHG emissions through 2020. The County's goal in the CAP is to reduce GHG emissions to 17 percent below 2005 baseline emissions by 2020 (a 49,600 MT reduction of CO¬2¬e). To meet the reduction goal, the County developed GHG reduction measures addressing 11 different topic areas including Residential Energy Efficiency, Commercial Energy Efficiency, Green Building Ordinance, Renewable Energy, Transportation, Alternative Fuels, Waste Diversion, Water Efficiency, Sustainable Agriculture Practices, Off-Road Technology, and Sequestration. The CAP also includes a project-level checklist for new development projects in the County to showcase compliance and consistency with the CAP. The Energy and Climate Change Element was adopted in June 2013 and is an optional element of the general plan that overlaps with the County's CAP. The General Plan element contains the County's overarching goals in regard to reducing GHG emissions through energy efficiency, while the CAP is the shorter-term plan to implement said goals.

The project would be consistent with measures and actions from both the County's General Plan and CAP for energy efficiency. Those General Plan policies specifically pertaining to energy include:

- Policy 2.5: Continue implementation of Green Building Standards that exceed State energy efficiency standards;
- Policy 3.2: Promote the production of appropriate off-site renewable energy for use in the unincorporated county;
- Policy 5.1: Facility the expansion of infrastructure for alternative fuel vehicles.

Relevant policies from the 2030 CAP include:

- Measure 3.1 Green Building Ordinance
- Measure 3.6: Regional Energy Efficiency Efforts

[13] County of San Mateo, *San Mateo County Energy Efficiency Climate Action Plan*, 2013. June. Available at: https://planning.smcgov.org/sites/planning.smcgov.org/files/documents/files/SanMateoCounty_EECAP_FINAL_06-04-2013.pdf. Accessed January 20201.
[14] San Mateo County, General Plan. Available: https://planning.smcgov.org/general-plan. Available: January 2021.

As mentioned above, the project features would comply with these local plans since it would meet Green Building Standards, receive electricity from PCE, would be constructed to achieve LEED Silver level certification, and would include two EV charging spaces. The project would not interfere with the CAP or General Plan's energy performance and efficiency strategies and would not conflict with or obstruct the State plan for renewable energy. Therefore, this impact would be less than significant.

7 Geology and Soils

Issues *Would the project:*	Significant or Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less than Significant	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
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? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☒	☐	☐
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on 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, liquefaction, or collapse?	☐	☒	☐	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☒	☐	☐
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?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

Setting

The project site is in the Santa Clara Valley, a relatively flat alluvial basin bounded by the Santa Cruz Mountains to the west, the Diablo Mountain Range to the east, and the Bay to the northeast. A project-specific geotechnical investigation was completed for the project site in December 2014, and the report is included as **Appendix D** to this Initial Study. Because the

project site has remained largely unchanged since 2014 and geologic conditions are relatively static, the 2014 report is still relevant and applicable to the current project.

Seismic Ground Shaking

Redwood City is in California's Coast Ranges Geomorphic Province, which is a geologically young and seismically active region. According to the Redwood City General Plan EIR and the Redwood City Downtown Precise Plan, the project site is not within an Alquist-Priolo Earthquake Fault Zone.[15] The active or potentially active faults of most significance to the site are the San Andreas, San Gregorio, and Hayward faults. The Hayward fault is approximately 14 miles northeast of the project site and runs in a northwesterly direction. The San Gregorio fault is approximately 13 miles southwest of the project site, and the San Andreas fault is approximately 4 miles southwest of the project site. It is predicted that these faults could produce an earthquake with a maximum moment magnitude of 6.7 to 7.9. Earthquakes on these or other active faults (including unmapped faults) could cause strong ground shaking at the project site.

Liquefaction and Subsidence

The project site is located within a State-designated Liquefaction Hazard Zone as well as a San Mateo County Liquefaction Hazard Zone.[16] Liquefaction is the temporary transformation of loose, saturated granular sediments from a solid state to a liquid state caused by seismic ground shaking. The soil type most susceptible to liquefaction is loose, cohesionless, granular soil below the water table and within about 50 feet of the ground surface. Liquefaction can result in a loss of foundation support and settlement of overlying structures, ground subsidence and translation due to lateral spreading, lurch cracking, and differential settlement. Lateral spreading occurs when a soil layer liquefies below the surface and causes horizontal movement or displacement of the surface layer across sloping ground.

Differential settlement or subsidence can occur if buildings or other improvements are built on low-strength foundation materials, or if improvements cross the boundary between different types of subsurface materials.

Landslides and Slope Failure

Slope failure and landslides can occur as either rapid movement of large masses of soil or slow, continuous movement called creep. The stability of the slope depends on the type of underlying soil or bedrock, the steepness of the slope, amount of rainfall, and presence of previous landslide deposits. The project site is relatively flat and does not contain slopes or other topography prone to landslides or creep.

[15] Redwood City, *Downtown Precise Plan*. Available: https://www.redwoodcity.org/departments/community-development-department/planning-housing/planning-services/general-plan-precise-plans/downtown-precise-plan. Accessed: January 2021.
[16] California Geological Survey. 2002. Earthquake Zones of Required Investigation. Available: https://maps.conservation.ca.gov/cgs/EQZApp/app/. Accessed: January 2021.

Expansive Soils

Expansion and contraction of volume can occur when expansive soils undergo cycles of wetting (swelling) and drying (shrinking). During these cycles, the volume of soil can significantly change and may cause structural damage to buildings and infrastructure. The project site is known to contain expansive soils.

Discussion

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

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? Refer to Division of Mines and Geology Special Publication 42.

Less than Significant. The San Andreas Fault is the closest active fault, approximately 4 miles southwest of Redwood City. However, the project site is not within an Earthquake Fault Zone as defined by the Alquist-Priolo Earthquake Fault Zoning Act of 1972 and no known active or potentially active faults exist on the project site. Therefore, the risk of fault rupture at the project site is low. Given that the project site is not within an Alquist-Priolo Earthquake Fault Zone, impacts related to the rupture of a known earthquake fault would be less than significant.

ii) Strong seismic ground shaking?

Less than Significant. The project site is located near historically active faults. Therefore, there is potential for strong seismic ground shaking at the project site. The intensity of ground shaking would depend on the earthquake magnitude, earthquake duration, and site-specific geologic conditions. Numerous active and potentially active Bay Area faults are capable of producing moderate to major earthquakes that could cause severe ground shaking at the site in the future. As stated in the geotechnical investigation, the soil beneath the project site is reasonably stable under seismic conditions.[17] While the potential for seismic ground shaking cannot be eliminated, the building would be constructed to comply with the 2019 CBC and other applicable standards and practices for earthquake-resistant construction. Compliance with these standards and practices reduce the risks associated with strong seismic ground shaking at the project site. Therefore, impacts related to seismic ground shaking would be less than significant. No mitigation is required.

iii) Seismic-related ground failure, including liquefaction?

Less than Significant with Mitigation Incorporated. According to the Redwood City General Plan EIR and the Downtown Precise Plan, lowland areas of Redwood City have a moderate to high potential for liquefaction. The Association of Bay Area governments (ABAG) liquefaction susceptibility interactive map designates the project site in an area of moderate susceptibility

[17]Geotechnical Investigation Redwood City Motor Pool, Fugro Consultants, Inc. 2014.

for liquefaction. According to the US Geological Survey (Open-file Report 00-444), the site is in an area of high susceptibility for liquefaction. Based on field investigation results, the project site is generally underlain by clayey sand to sandy lean clay below the design groundwater level at about 13 to 15 feet bgs. Overall, the project site has a moderate to high liquefaction potential and additional investigation is recommended to verify the liquefaction potential at the project site, to avoid potential environmental impacts. **Mitigation Measure GEO-1** requires additional investigation:

> **Mitigation Measure GEO-1:** Additional field investigations shall be performed to obtain soil data and verify liquefaction potential during the design phase. If it is determined that the potential for liquefaction is high at the project site, specific performance measures and ground improvements techniques shall be incorporated to reduce this hazard. These techniques shall be chosen during the final design phase, and may include: Jet grouting, cement deep soil mixing, and/or compaction grouting.

With the incorporation of **Mitigation Measure GEO-1**, impacts related to liquefaction would be less than significant.

iv) Landslides?

No Impact. Redwood City is relatively flat, without steep or unstable slopes. The project site does not have an irregular surface. According to the Redwood City General Plan EIR, the nearest location where earthquake-induced landslides have the potential to occur is 2.5 miles southwest of the project site. As such, natural slope instability does not affect the project site and landslides are not considered a hazard in the area. Therefore, no impact would occur.

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

Less than Significant. Soil erosion is a natural process that can be caused by wind or water. Eroded soils can get into storm water runoff and be carried into waters such as streams, thereby affecting water quality. Project construction would involve ground disturbing activities that would expose soils and could increase the potential for soil erosion from wind or stormwater runoff. Erosion control requirements are stipulated in the National Pollutant Discharge Elimination System (NPDES) Permit issued by the regional water quality control board (RWQCB). These requirements include the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) that contains BMPs for project construction. The purpose of the SWPPP is to identify potential sediment sources and other pollutants and prescribe BMPs to ensure that potential adverse erosion, siltation, and contamination impacts would not occur during construction activities (see further discussion of NPDES Permit requirements in **Section 9, Hydrology and Water Quality**).

Implementation of a SWPPP with BMPs would control soil erosion and loss of topsoil. Therefore, this impact would be less than significant and no mitigation is required.

c) Be located on 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, liquefaction, or collapse?

Less than Significant with Mitigation Incorporated. As previously discussed, the project site is not located in an area with high susceptibility to landslides. The project site may be susceptible to liquefaction due to underlying granular and silty soils. However, with implementation of standard building safety requirements in the current CBC and **Mitigation Measure GEO-1**, the foundation would be reinforced to withstand potential liquefaction and the impact would be less than significant.

d) Be located on expansive soil, as defined in Table 18 1 B of the Uniform Building Code (1994, as it may be revised), creating substantial direct or indirect risks to life or property?

Less than Significant with Mitigation Incorporated. The geotechnical report concluded that the top 5 to 6 feet of soil at the project site is highly expansive. The project design and construction, including excavation activities, would be required to comply with Chapter 33 of the current CBC, which specifies the safety requirements to be fulfilled for site work and protection of adjacent properties from damage during excavation. This would include the prevention of subsidence or pavement or foundations caused by dewatering. Additionally, the geotechnical report includes recommendations for site work, grading, building foundations, flatwork, retaining walls, and pavements to avoid site-specific risks associated with expansive soils. Adherence to **Mitigation Measure GEO-2**, which is based on the recommendations of the geotechnical report, would reduce the impact to a less-than-significant level. The project will incorporate site-specific design and construction measures listed in the geotechnical report to reduce risks associated with expansive soils, ensuring the building and its occupants are not exposed to safety risks associated with expansive soils.

> **Mitigation Measure GEO-2**: The applicant shall prepare a monitoring program to determine the effects of construction on nearby improvements, including the monitoring of cracking and vertical movement of adjacent structures, and nearby streets, sidewalks, utilities, and other improvements. As necessary, inclinometers or other instrumentation shall be installed as part of the shoring system to closely monitor lateral movement. The program shall include a pre-construction survey including photographs and installation of monitoring points for existing site improvements.

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?

No Impact. The project site is located within an urbanized area of Redwood City where sanitary sewer lines are available to dispose wastewater from the project site. Additionally, wastewater onsite would typically be disposed of through the municipal wastewater disposal system. No septic tanks or other alternative wastewater disposal is proposed. Therefore, no impact would occur.

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

Less than Significant with Mitigation Incorporated. Due to levels of earthwork associated with project implementation, the project has the potential to directly or indirectly destroy a unique paleontological resource on the project site. The following general mitigation measures, as provided by the Tribal Energy and Environmental Information Clearinghouse, Office of Indian Energy and Economic Development, have been included to mitigate any potential impact to paleontological resources to a less than significant level.

Mitigation Measure GEO-3: A discovery of a paleontological specimen during any phase of the project shall result in a work stoppage in the vicinity of the find until it can be evaluated by a professional paleontologist. Should loss or damage be detected, additional protective measures or further action (e.g., resource removal), as determined by a professional paleontologist, shall be implemented to mitigate the impact.

Mitigation Measure GEO-4: Periodic monitoring of known significant paleontological resources in the vicinity of the development (including areas where new road access has been provided) may be required to reduce the potential for looting and vandalism. Should loss or damage be detected, additional protective measures or further action (e.g., resource removal), as determined by a professional paleontologist, shall be implemented to mitigate the impact.

Mitigation Measure GEO-5: Use existing roads to the maximum extent feasible to avoid additional surface disturbance.

Mitigation Measure GEO-6: During all phases of the project, keep equipment and vehicles within the limits of the previously disturbed areas of the project site.

Mitigation Measure GEO-7: All workers shall be educated on the consequences of unauthorized collection or sale of fossils.

8 Greenhouse Gas Emissions

Issues *Would the project:*	Significant or Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less than Significant	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Setting

Rincon Consultants prepared an Air Quality and Greenhouse Gas Study in 2020 (**Appendix A**) to analyze the project's potential GHG emissions.

Global warming associated with the "greenhouse effect" is a process whereby GHG's accumulating in the atmosphere contribute to an increase in the temperature of the earth's atmosphere. The principal GHGs contributing to global warming and associated climate change are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and fluorinated compounds. Emissions of GHGs contributing to global climate change are attributable in large part to human activities associated with the transportation, industrial and manufacturing, utility, residential, commercial, and agricultural sectors. Although light industrial uses currently operate on the project site, GHG emissions from these uses were not accounted for in Rincon's analysis in order to provide a conservative project emissions estimate. Emissions attributed to energy use include emissions from natural gas consumption for space and water heating. Area source emissions are generated by landscape maintenance equipment, consumer products, and architectural coatings. Mobile source emissions consist of emissions generated by vehicle trips to and from the project site.

Plan Bay Area

Plan Bay Area 2040 is a state-mandated, integrated long-range transportation, land-use, and housing plan that would support a growing economy, provide more housing and transportation choices and reduce transportation-related pollution in the nine-county San Francisco Bay Area.[18] The Sustainable Community Strategy (SCS) builds on earlier efforts to develop an efficient transportation network and grow in a financially and environmentally responsible way. Plan Bay Area 2040 would be updated every four years to reflect new priorities. A goal of the SCS is to "reduce VMT per capita by 10 percent."

[18] Association of Bay Area Governments, *Forecasts and Projections.* Available: https://abag.ca.gov/our-work/economic-analysis/forecasts-projections . Accessed: January 2021.

Methods

Construction Emissions

Construction activities emit GHGs primarily though combustion of fossil fuels to power off-road construction equipment, on-road construction vehicles, and commute vehicles of the construction workers. Smaller amounts of GHGs are emitted indirectly through the energy required for water used for fugitive dust control and lighting for the construction activity. Every phase of the construction process, including demolition, grading, paving, and building, emits GHG emissions in volumes proportional to the quantity and type of construction equipment used. Heavier equipment typically emits more GHGs per hour than does lighter equipment because of its engine design and greater fuel consumption.

BAAQMD has not adopted a threshold for construction-period GHG emissions, as GHG emission impacts reflect the long-term and cumulative effect of GHG on a global scale, while construction-period emissions are intermittent and temporary.

Operational Emissions

BAAQMD recommends that lead agencies determine appropriate air quality emissions thresholds of significance based on substantial evidence in the record. BAAQMD developed screening criteria in the 2017 CEQA Air Quality Guidelines to provide lead agencies and project applicants with a conservative indication of whether a project could result in potentially significant air quality impacts. BAAQMD has adopted the following thresholds of significance to assist in the review of operational GHGs under CEQA:

- Consistency with a qualified GHG Reduction Strategy (such as a climate action plan); or
- Emissions below 1,100 MT of CO_2e per year per project; or
- Emissions below 4.6 MT CO_2e per service population per year.[19]

Use of the efficiency threshold of 1,100 MT of CO_2e per year per project is appropriate for commercial projects per BAAQMD's 2017 CEQA Air Quality Guidelines. Because the project includes 13,000 square feet of commercial space, this threshold was used to evaluate project emissions. Although the BAAQMD has not yet quantified a threshold for 2030, reducing the 1,100 MT CO_2e per year threshold by 40 percent to 660 MT CO_2e per year would be consistent with the State reduction target established in SB 32. As such, the adjusted bright-line threshold of 660 MT CO_2e per year is the most appropriate threshold for the project. Emissions from the project's backup generator were compared to the BAAQMD stationary source threshold of 10,000 MT per year. Additionally, this analysis qualitatively assesses consistency with local and statewide GHG reduction regulations.

[19] The 4.6 MT CO2e/Service Population/year threshold is intended for land use development projects including residential, commercial, industrial, and public land uses and facilities. This threshold does not apply to stationary source projects (BAAQMD 2017).

Area Source Emissions

Emissions associated with area sources, including consumer products, landscape maintenance, and architectural coating, were calculated in CalEEMod and utilize standard emission rates from CARB, U.S. EPA, and emission factor values provided by the local air district.

Water and Wastewater Emissions

Water used and wastewater generated by a project generate indirect GHG emissions. These emissions are a result of the energy used to supply, convey, and treat water and wastewater. In addition to the indirect GHG emissions associated with energy use, the wastewater treatment process itself can directly emit both CH_4 and N_2O.

The indoor and outdoor water use consumption data for each land use subtype comes from the Pacific Institute's *Waste Not, Want Not: The Potential for Urban Water Conservation in California* (2003).[20] Based on that report, a percentage of total water consumption was dedicated to landscape irrigation, which is used to determine outdoor water use. Wastewater generation was similarly based on a reported percentage of total indoor water use.

New development is subject to CALGreen, which requires a 20 percent increase in indoor water use efficiency. Thus, in order to account for compliance with CALGreen, a 20 percent reduction in indoor water use was included in the water consumption calculations for new development. In addition to water reductions associated with building code compliance the GHG emissions from the energy used to transport the water for both existing and new development account for compliance with the RPS as discussed under "Energy Emissions."

Solid Waste Emissions

The disposal of solid waste produces GHG emissions from the transportation of waste, anaerobic decomposition in landfills, and incineration. According to a CalRecycle report to the Legislature, as of 2013 California had achieved a statewide 50 percent diversion of solid waste from landfills through "reduce/recycle/compost" programs. The methods for quantifying GHG emissions from solid waste are based on the Intergovernmental Panel on Climate Change (IPCC) method, using the degradable organic content of waste. GHG emissions associated with the project's waste disposal were calculated using these parameters.

Energy Use Emissions

GHGs are emitted on-site during the combustion of natural gas for space and water heating and off-site during the generation of electricity from fossil fuels in power plants.

In CalEEMod, electricity emissions are calculated by multiplying the energy use times the carbon intensity of the utility district per kilowatt hour). The default provider for the County of San Mateo would be PG&E; however, since PCE is the main electricity provider in the City, the defaults were changed to account for this difference. PCE's specific energy intensity factors (i.e., the amount of CO_2, CH_4, and N_2O per kilowatt-hour) were used in the calculations of GHG emissions.

[20] Air Quality and Greenhouse Gas Study, Rincon Consultants 2020

Mobile

Mobile sources, CO_2, and CH_4 emissions are generally quantified in CalEEMod using CalEEMod defaults. However, since the project would not generate new daily trips compared to the existing land use, the mobile emissions from the project were considered negligible. Default CalEEMod trip generation rates were zeroed out in the model. Therefore, there would be no net new mobile GHG emissions.

Stationary Sources

Please refer to "Operational Impacts" under item "c" for more details on how the proposed backup generator was modeled in CalEEMod.

Discussion

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less than Significant. As described below, construction and operation of the project would not generate GHG emissions that would have a significant impact on the environment.

Construction Emissions

Project-related construction emissions would be confined to a short period of time compared to the overall life of the project. Neither San Mateo County nor BAAQMD have adopted a threshold of significance for construction-related GHG emissions. However, BAAQMD recommends quantifying and disclosing GHG construction emissions and use of BMPs to minimize construction-period emissions. With implementation of BMP's, impacts related to Construction-related GHG emissions would be less than significant. **Table 10** shows that project construction would result in a total of approximately 211 MT CO_2e.

Table 10 Estimated Construction GHG Emissions

Construction	Project Emissions MT CO_2e
2021	145
2022	66
Total	**211**

Source: Rincon Consultants, 2020

Operational Emissions

Table 11 shows GHG emissions associated with operation of the project. As shown, the project would generate approximately 29 MT of CO_2e per year, which would not exceed the adjusted BAAQMD efficiency threshold of 660 MT CO_2e per year. The project's stationary source emissions would also be below the BAAQMD threshold of 10,000 MT CO_2e per year. Therefore, impacts would be less than significant.

Table 11 2030 Annual GHG Emissions for Proposed Project

Emission Source	Annual Emissions (MT CO_2e)
Operational	
Area	<1
Energy	20
Solid Waste	6
Water	3
Mobile	
CO_2 and CH_4	*
N_2O	*
Total Project Emissions	**29**
Adjusted BAAQMD Efficiency Threshold (per MT CO_2e)	660
Exceeds Threshold?	No
Stationary Source (Backup Generator)	**5**
BAAQMD Stationary Source Threshold (per MT CO_2e)	10,000
Exceeds Threshold?	No

* The project would not generate net new mobile trips.
MT of CO_2e = metric tons of carbon dioxide equivalent. Numbers may not add up due to rounding.
Source: Rincon Consultants, 2020

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less than Significant. As described below, the project would not conflict with any applicable plans, policies, or regulations related to GHG emissions.

Consistency with GHG Reduction Plans and Policies

San Mateo County adopted their Energy Efficiency CAP in June 2013. The CAP includes a checklist to ensure that development in San Mateo County complies with the County's GHG reduction measures. In order to meet their emission targets, the checklist includes mandatory measures for all projects and voluntary measures that could be incorporated as mitigation measures for proposed projects, at the discretion of the County. Project consistency with the CAP is demonstrated through multiple project features, namely the achievement of at least a LEED Silver level certification and use of carbon-free electricity from PCE. **Table 12** provides a summary of the project's consistency with applicable goals, targets, and policies of Plan Bay Area 2040 and the Energy Efficiency CAP. As shown in **Table 12**, the project would be consistent

with applicable regional and local plans and policies to reduce GHG emissions and impacts would be less than significant.

Table 12 Plan and Policy Consistency

Goals and Strategies	Project Consistency
Plan Bay Area 2040	
Preserve agriculture and open space by planning direct development within urban footprint	**Consistent-** The project is a compact infill development located within a dense urban area of Redwood City and is not on or adjacent to agricultural land.
Energy Efficiency CAP Development Checklist	
3.1 Green Building Ordinance **3.2 Green Building Incentives**	**Consistent**- The project would comply with the Green Building Ordinance and achieve CALGreen Tier 1 energy efficiency standards. In addition, the project will be designed to meet LEED Silver-level certification.
3.3 Urban Heat Island	**Consistent** - The project would include placement of 75 percent of its parking spaces under an enclosed cover, which would reduce the urban heat island effect.
10.1 Low Carbon Fuel Infrastructure	**Consistent**- The project would provide one clean air parking space and two EV parking spaces. In addition, the project would include seven bicycle parking spaces.
14.1 Smart Water Meters **14.2 Water Reuse**	**Consistent** - The project would include controlled and metered irrigation systems for outdoor landscaping.
15.1 Construction Idling	**Consistent** - The construction equipment for new development would comply with the best management practices from BAAQMD guidance including limiting idling time by shutting equipment off when not in use or by reducing maximum idling time to 5 minutes. See Table 8-2 in the BAAQMD CEQA Guidelines for the Basic Construction Mitigation Measures.

Source: Association of Bay Area Governments 2017, County of San Mateo 2013a

9 Hazards and Hazardous Materials

Issues *Would the project:*	Significant or Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less than Significant	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
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?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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 or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

Setting

A Phase I and Phase II Environmental Site Assessment (ESA) was conducted by TRC Environmental Solutions in November 2014 to identify and evaluate any potential hazards to human health in the vicinity of the project site (see **Appendix E**). Because the use of the project site has remained consistent since 2014, and surrounding development has also remained generally stable without the introduction of new potential sources of contamination, the 2014 reports are still applicable and relevant for the project.

Potential Sources of Contamination

The ESA revealed evidence of recognized environmental conditions (RECs), including a controlled recognized environmental condition (CRECs). A REC is the presence of a hazardous substance due to a release into the environment. A CREC is a past release of a hazardous substance that has been addressed but can remain in place subject to implementation of agency required controls (land use restrictions and activity limitations).

- REC No 1: The active REC entails a 500-gallon waste oil underground storage tank (UST) that is potentially located in the southern portion of the site. According to closure reports issued by the San Mateo County Division of Environmental Health, the UST was assumed to be either removed or grouted in place prior to 1992. However, documentation confirming the removal of the tank and its status is unknown.
- CREC No 1: The CREC entails residual soil and groundwater contamination in connection with the removal of two 7,500-gallon USTs on the project site in 1982. According to the leaking underground storage tank (LUST) case closure reports, petroleum hydrocarbons were detected in the groundwater during the excavation for two new 10,000-gallon USTs. Affected water was removed and disposed of off-site; however, reports indicated that residual amounts of contamination potentially remain in the soil and groundwater. The San Mateo County Division of Environmental Health closed the LUST case stating that although these hydrocarbons do not appear to pose a significant risk to public health or the environment under existing land uses, a change in land use or removal of soil and groundwater from these areas below approximately 5 feet below grade require notification to the San Mateo County Division of Environmental Health.

The project site was the subject of a LUST case in the late 1990s, which found that diesel had contaminated groundwater at the property. Historical information indicated the following underground storage tanks (USTs) were installed at the project site:

- One 500-gallon used-oil tank in 1951;
- One 6,000-gallon UST in 1951;
- One 2,000-gallon UST in 1955;
- Three 6,000-gallon USTs in 1955.

Airport Hazards

The project site is located approximately 3 miles southeast of the San Carlos Airport, approximately 20 miles northwest of the San José International Airport, and approximately 16 miles south east of the San Francisco International Airport. The Redwood City/Council of Governments (C/CAG) of San Mateo County, in its designated role as the Airport Land Use Commission for San Mateo County, has adopted the land use control provisions for airport vicinities identified in the Federal Aviation Regulations (FAR) Part 77, Objects Affecting Navigable Airspace for the San Carlos Airport. FAR Part 77 established height restrictions and federal notification requirements for proposed development projects within airspace boundaries for San Carlos Airport. The project site is not in the airport influence area for the San Carlos Airport.

The use, storage, and disposal of hazardous materials, including management of contaminated soils and groundwater, are regulated by numerous local, State, and federal laws and regulations.

The CAL FIRE-Office of the State Fire Marshal (OSFM) is responsible for ensuring the implementation of the Aboveground Petroleum Storage Act (APSA). APSA regulates facilities with aggregate aboveground petroleum storage capacities of 1,320 gallons or more, which include aboveground storage containers or tanks with petroleum storage capacities of 55 gallons or greater. These facilities typically include large petroleum tank facilities, aboveground fuel tank stations, and vehicle repair shops with aboveground petroleum storage tanks. Facilities with total petroleum storage quantities at or above 10,000 gallons are inspected at least once every 3 years by a Certified Unified Program Agency (CUPA) and have reporting and fee requirements. All regulated facilities must meet the federal (SPCC) rule requirements.

In Redwood City, San Mateo County Health Department, Environmental Health Division (SMCEHD) is a CUPA, responsible for coordination of the Hazardous Materials Business Plan Program, local hazardous waste generator program, UST management, and investigation of leaking USTs. Any facility operating aboveground storage tanks with an aggregate tank capacity of 1,320 gallons or more must: 1) complete a SPCC plan to provide a detailed engineering analysis of the potential for release from the tanks present at a facility and the measures, such as secondary containment and emergency response, that can be implemented to reduce the release potential and 2) Submit a California Business Plan to CUPA.

The California Business Plan program was established to prevent or minimize damage to public health and safety and to the environment, from a release or threatened release of hazardous materials. It also satisfies community right-to-know laws. This is accomplished by requiring businesses that handle hazardous materials in quantities equal to or greater than 55 gallons of a liquid, 500 pounds of a solid, or 200 cubic feet of compressed gas, or extremely hazardous substances above the threshold planning quantity (40 CFR, Part 355) to:

- Inventory their hazardous materials.
- Develop a site map.
- Develop an emergency plan.
- Implement a training program for employees.

Primary federal laws pertaining to hazardous materials and wastes include the Resource Conservation and Recovery Act of 1976 (RCRA) and the Comprehensive Environmental Responsibility, Compensation, and Liability Act of 1980 (CERCLA). RCRA includes procedures and requirements for managing hazardous materials and for cleanup of hazardous materials releases. CERCLA delineates the liability for contamination between current property owners and others. The Hazardous Materials Transportation Act regulates the transport of hazardous materials. The federal government delegates enforcement authority to the States.

Discussion

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

Less than Significant. The project would not require routine transport or disposal of hazardous materials but would have diesel fuel stored on site**.** One 10,000-to-12,000-gallon primary fuel storage tank would be located aboveground on-site, as well as two smaller 1,000-gallon sub-base day tanks, which would contain fuel to operate the generators Implementation of the project would involve construction of a new, 13,000-square foot radio service facility. This would involve demolition of one of the existing structures on site.

During construction of the project, paint, building material finishing products, and automotive oil would be used. However, such materials would be used temporarily and typically do not generate hazardous air pollutant emissions or pose a long-term threat to human health or the environment. Improper disposal could increase risk of exposure for nearby residents through direct contact or by adversely affecting soil, groundwater, or other surface waters. However, any hazardous materials transportation, use, and disposal as part of the project would be subject to federal and State hazardous materials laws and regulations.

During operation, two emergency diesel generators will be located aboveground at the project site. One 10,000-to-12,000-gallon primary fuel storage tank would be located aboveground on-site, as well as two smaller 1,000-gallon sub-base day tanks, which would contain fuel to operate the generators. These aboveground storage tanks could pose a risk to the public in the event of an accidental discharge; however, the County would be required comply with the APSA. Given that the total aboveground storage tank capacity would be above 1,320 gallons, the County would be required to complete a SPCC plan and submit a Business Plan to SMCEHD. The SPCC Plan must include:

- A list of the oil containers at the facility including the contents and location of each container;
- A brief description of the procedures that will used to prevent oil spills;
- A brief description of the measures installed to prevent oil from reaching water;
- A brief description of the measures used to contain and cleanup an oil spill; and
- A list of emergency contacts and first responders.

The following spill prevention measures are also required as part of the SPCC plan:

- Use containers suitable for the oil stored.
- Identify contractors or other local personnel who can help clean up an oil spill;
- Provide overfill prevention for the oil storage containers;
- Provide effective, sized secondary containment for bulk storage containers, such as a dike or a remote impoundment. The containment must be able to hold the full capacity of the container plus possible rainfall. The dike may be constructed of earth or concrete. A double-walled tank may also suffice;

- Provide effective, general secondary containment to address the most likely discharge where you transfer oil to and from containers and for mobile refuelers, such as fuel nurse tanks mounted on trucks or trailers; and
- Periodically inspect and test pipes and containers. Aboveground pipes and containers should be visually inspected following industry standards. Buried pipes must be leak tested when they are installed or repaired. A written record of inspections must be kept.

Additionally, because the total fuel storage on-site would be greater than 10,000 gallons, the County would comply with reporting and fee requirements and the tanks would be inspected at least once every 3 years by SMCEHD. With adherence to such regulations regarding the transport, use, and disposal of hazardous materials, the project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Therefore, impacts would be less than significant.

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?

Less than Significant. According to the Phase I ESA, the project site has documented unidentified substance containers, likely containing hazardous constituents or petroleum products associated with the past property uses. The property is documented as have one 500-gallon used-oil tank from 1951, one 6,000-gallon UST from 1951, one 2,000-gallon UST from 1955, and three 6,000-gallon USTs from 1955. Therefore, Phase II testing was completed to measure the extent of soil and/or ground water contamination on the project site.

While no soil contaminants were detected above their naturally-occurring background levels, hazardous chemicals such as benzene, perchloroethylene, and trichloroethylene were found in the groundwater at the initial time of testing. Because groundwater was encountered approximately 13 to 15 feet bgs and maximum depth of excavation for the project is anticipated to be approximately 8 to 10 feet bgs, it is not anticipated that construction will excavate deep enough to reach potentially contaminated groundwater. Therefore, this impact would be less than significant, and no mitigation is required.

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

No Impact. There is one school within one-quarter mile of the project site: Hoover Charter School, which is located approximately 0.2 mile southeast. As described above, soils within the project site were found not to contain substantial levels of hazardous contaminants and groundwater is unlikely to be encountered during construction or operation.

Equipment used for construction purposes would entail usage of fuels, solvents, and other common but potentially hazardous substances. Numerous federal and State regulations govern the use and safe handling of such substances, such that their temporary usage as part of the project would not pose any significant risk to people in the project vicinity. Therefore, there would be no impact.

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?

No Impact. According to a review of all applicable federal, State, and local databases related to hazardous material and/or cleanup listings completed as part of the Phase I ESA, the property at 752 Chestnut Street is not included on the Cortese list compiled pursuant to Government Code Section 65962.5. Therefore, no impact would occur.

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 or excessive noise for people residing or working in the project area?

No Impact. The project site is located approximately 3 miles southeast of the San Carlos Airport, approximately 20 miles northwest of the Norman Y. Mineta San José International Airport, and approximately 16 miles south east of the San Francisco International Airport. The project site is not located within the San Carlos Airport Influence Area.[21] Therefore, the project would not result in a safety hazard for people residing or working in the project site. Therefore, no impact would occur with project implementation.

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

No Impact. The project would not change the local roadway circulation pattern in a way that would physically interfere with local emergency response plans. No impact would occur with project implementation.

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

No Impact. The project site and surrounding area are entirely developed. The area does not contain, nor is it adjacent to, wildlands. Accordingly, implementation of the project would not result in the exposure of people or structures to significant loss, injury, or death involving wildfire. No impact would occur.

[21] City/County Association of Governments of San Mateo County, *Comprehensive Airport Land Use Compatibility Plan For the Environs of San Carlos Airport.* Available: https://ccag.ca.gov/wp-content/uploads/2015/11/SQL_FinalALUCP_Oct15_read.pdf. Accessed: January 2021.

10 Hydrology and Water Quality

Issues *Would the project:*	Significant or Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less than Significant	No Impact
a) Violate any water quality standards or waste discharge requirements? or otherwise substantially degrade surface or groundwater quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☐	☒
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 which 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 offsite;	☐	☐	☒	☐
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	☐	☐	☒	☐
iv) Impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

Setting

San Mateo County is within the Bay portion of the Coast Range Geologic Province. Annual average precipitation in San Mateo County is reported at approximately 25 inches. The State Water Resources Control Board (SWRCB) and the RWQCB monitor water quality in the Bay Area. These agencies oversee the implementation of the NPDES stormwater discharge permits. Redwood City participates in the San Mateo Countywide Pollution Prevention Program (STOPPP)

and is required to implement Low Impact Development (LID) BMPs under the Municipal Regional Stormwater Permit (MRP) (Provision C.3.b.). LID practices include source control BMPs, site design BMPs, and stormwater treatment BMPs on site or at a joint stormwater treatment facility.

Five buildings are located on the project site, including the San Mateo County Grant Corporation building and a 2,700 square-foot one-story building used for County pest control services along the western property line. The majority of the project site is paved. According to the Geotechnical Investigation prepared for the project site (see **Appendix D**), groundwater was encountered approximately 13 to15 feet bgs.

The project site overlays the southern portion of the San Mateo Plain groundwater sub-basin of the Santa Clara Valley Groundwater Basin. Redwood City's Public Works Services Department maintains, operates, and repairs the stormwater system that serves the project site. The Bayfront Canal serves as a major stormwater runoff collection and discharge feature for Redwood City, and collected Stormwater eventually flows into the San Francisco Bay.

Based on the Federal Emergency Management Agency (FEMA)'s Flood Insurance Rate Maps (Map 06081C0301E), the project site is in Flood Zone X. Areas in Flood Zone X are determined to be outside of the 500- year flood zone and have minimal risk of flooding. There are no floodplain requirements for Zone X.

Discussion

a) Violate any water quality standards or waste discharge requirements, or otherwise substantially degrade surface or groundwater quality?

Less than Significant. Construction of the project would include excavation, grading, and other activities that would result in ground disturbance to approximately 1,650 cy of the project site. The maximum depth of such activities would be approximately 8 to 10 feet, where the depth to groundwater is approximately 13 to 15 feet bgs.

Because project construction would not disturb over 1 acre, the project would not be subject to a NPDES General Construction Permit. As the project does not meet the requirements of a NPDES permit, it is assumed that the project is below the threshold for projects that would substantially degrade water quality. The project would not replace more than 10,000 square feet of impervious surface, it would not be subject to the requirements of Provision C.3 of the Municipal Regional Stormwater Permit.

The potential for impacts to groundwater quality during construction is unlikely due to the impervious nature of the project site and because excavation depths are only expected to reach a maximum of 10 feet bgs. As stated above, the ground water table exists between 13 to 15 feet bgs. Water from construction would be treated using a media filter (sand, compost, or proprietary media). Additionally, through compliance with the provisions of the Redwood City

Stormwater Management and Discharge Control Program, impacts to water quality would be considered less than significant.[22]

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

No Impact. The project site does not presently contribute to the recharging of groundwater. Furthermore, as noted in the Redwood City General Plan EIR, groundwater is not currently used as a source of municipal water in Redwood City.[23] Implementation of the project would not increase the quantity of water needed on site.

Dewatering is not anticipated because project-related excavation is expected to reach a maximum of 10 feet whereas groundwater is found at a level of 13 to 15 feet. Therefore, the project would not deplete groundwater and would not interfere with overall groundwater flow and no impact to groundwater supplies would occur.

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 which would:

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

Less than Significant. Project construction would involve some ground disturbing activities. As noted above under item ”a”, project construction would not be subject to a State NPDES General Construction Permit. Furthermore, the site is currently fully developed with impervious paving. Redevelopment would not significantly alter the amount of impervious surfaces on the project site, and the drainage patterns on the project site would not be significantly changed. As such, the project is not likely to contribute substantial amounts of sediment to storm drain systems beyond existing conditions. Given that the drainage patterns at the site would not be significantly altered, impacts resulting from erosion or siltation would be less than significant.

[22] Redwood City, Code of Ordinances – Chapter 27A Stormwater Management and Discharge Control Program. Available: https://library.municode.com/ca/redwood_city/codes/code_of_ordinances?nodeId=CH27ASTMADICOPR. Accessed: January 2021.

[23] Redwood City General Plan, *Environmental Impact Report.* Available: https://www.redwoodcity.org/departments/community-development-department/planning-housing/planning-services/environmental-documents/general-plan-eir. Accessed: January 2021.

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

and

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?

Less than Significant. During project construction and operation, use of the project site by motor vehicles would typically result in the deposit of various materials on the roadway and adjacent areas that constitute urban pollution. Engine oil, antifreeze, heavy metals, transmission fluid, rubber, etc. can be transported in surface water runoff during storm events. Use of the project site by motor vehicles would typically result in the deposit of various materials on the roadway and adjacent areas that constitute urban pollution as previously discussed. However, such vehicle use would not be substantially greater than that under existing conditions, and no new significant sources of polluted runoff would be created. As discussed above under item ”a” above, compliance with the Redwood City Stormwater Management and Discharge Control Program would protect water quality from potential contaminants in stormwater runoff emanating from the construction site.

Once operational, the amount of surface runoff generated by the project is not expected to substantially increase compared to existing conditions. The project site is fully developed with substantial areas of impervious paving. The project would not significantly alter the quantity of impervious surfaces at the project site nor would it alter the existing drainage patterns. No new water intensive activities are proposed that would contribute substantial additional runoff that could exceed the capacity of stormwater drainage systems in the area. Given that proposed activities at the project site are similar to existing conditions and no new substantial runoff is expected, impacts related to runoff would be less than significant.

iv) Impede or redirect flood flows?

Less than Significant. According to the Federal Emergency Management Agency (FEMA), the project site is located within FEMA Flood Insurance Rate Map Zone X. Zone X means that the area is outside the special flood hazard area (SFHA) and higher than the elevation of the 0.2 percent annual-chance flood. Therefore, the project would have no impact associated with the 100-year flood hazard. Flooding risks associated with the project would not be altered as a result on project implementation. Given the low risk of flooding on the project site and the sufficient stormwater drainage system at the project site, the potential to impede or redirect flood flows would be low and this impact would be less than significant.

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

No Impact. The project site is approximately 15 miles from the Pacific Ocean. Tsunamis are large ocean waves generated by earthquakes and can be damaging to lowland coastal areas and typically affect coastlines and areas up to 0.25 mile inland. Due to the project’s distance from

the coast, potential impacts related to tsunami are nonexistent. The project site is mostly flat, thus the possibility of inundation by landslides is remote. Because of the project site's distance from the Pacific Ocean, there are no potential impacts related to a tsunami.[24] Additionally, the project site is not susceptible to impacts resulting from seiche because of its distance from the San Francisco Bay and the Pacific Ocean. According to the Sam Mateo County Dam Failure Inundation Hazard Maps, the project site is not located within a dam failure inundation area.[25] Finally, as stated previously, the relatively flat topography of the project site and its immediate surroundings reduce the likelihood of mudflows. No impact would occur This impact would be less than significant, and no mitigation is required.

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

Less Than Significant. As mentioned above, although the project would be owned and operated by San Mateo County, project construction would comply with relevant Redwood City stormwater requirements. The project would not conflict with any activities outlined in the 2015 Urban Water Management Plan for Redwood City.[26] Therefore, the impact would be less than significant, and no mitigation is required.

[24] Department of Conservation, *Tsunami Inundation Map*. Available: https://www.conservation.ca.gov/cgs/Documents/Publications/Tsunami-Maps/Tsunami_Inundation_RedwoodPointPaloAlto_Quads_SanMateo.pdf Accessed: January 2021.
[25] County of San Mateo, Dam Failure Inundation Areas - San Mateo County. Available: https://planning.smcgov.org/sites/planning.smcgov.org/files/documents/files/Dam_Failure_Inundation.pdf. Accessed: January 2021.
[26] Erler & Kalinowski, Inc, *2015 Urban Water Management Plan for the City of Redwood City,* 2016. Available: http://www.redwoodcity.org/home/showdocument?id=8091. Accessed: January 2021.

11 Land Use and Planning

Issues *Would the project:*	Significant or Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less than Significant	No Impact
a) Physically divide an established community?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Setting

The project site is in Redwood City at the Grant Corporation Yard, which is owned and operated by San Mateo County. However, because the San Mateo County General Plan does not designate specific land uses for this area, Redwood City land use designations and zoning are analyzed within this section. The Redwood City General Plan designates the project site as Residential-High Density (40 dwelling units (du)/acre (ac) maximum) but the project site is zoned as Industrial Restricted District. Surrounding areas include Mixed Use-Live/Work (20 du/ac) and commercial land uses. Residential neighborhoods border the western and southern portions of the project site along Chestnut Street, Buckeye Street, and Spruce Street, as shown in **Figure 3**. The northern limits of the project site border the Woodside Technology Centre, which is an office park located on Spring Street. The eastern limits of the project site border a storage facility, Extra Storage-Redwood City.

Discussion

a) Physically divide an established community?

No Impact. The project site is already developed and used by San Mateo County employees. Project improvements would be confined to the project site, and no off-site improvements are anticipated. Given that the project would replace one industrial use with another, implementation of the project would not physically divide an established community. Therefore, no impact would occur.

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?

No Impact. The Redwood City General Plan land use designation for the project site is Residential – High Density (40 dwelling units/acre maximum) but is zoned IR – Industrial Restricted District. The project would be consistent with existing land use designations and zoning; no changes to the Redwood City General Plan land use designations or zoning are proposed. Therefore, no impact would occur.

12 Mineral Resources

Issues *Would the project:*	Significant or Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less than Significant	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Setting

The California Geological Survey (CGS) is responsible under the Surface Mining Control and Reclamation Act (SMARA) for classifying land into Mineral Resource Zones (MRZs) based on the known or inferred mineral resource potential of that land. Based upon available data, the project site and area surrounding the project limits have been classified as MRZ-1, which is defined as "areas where geologic information indicates no significant mineral deposits are present". This finding is reflected in the San Mateo County General Plan Mineral Resources map.[27]

Discussion

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?

and

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?

No Impact. The project site is currently developed and not used for mineral recovery activities. According to the Redwood City General Plan EIR, there are no known mineral resources within Redwood City. The urbanization of the area over the past 40 years has resulted in extensive excavation of topsoil, and it is unlikely that any valuable mineral resources exist.[28] Moreover, no known mineral resources exist within the project site or surrounding area, as indicated by the

[27] San Mateo County, *General Plan*. Available: https://planning.smcgov.org/general-plan. Available: January 2021.
[28] Redwood City General Plan, *Environmental Impact Report*. Available: https://www.redwoodcity.org/departments/community-development-department/planning-housing/planning-services/environmental-documents/general-plan-eir. Accessed: January 2021.

CGS Mineral Land Classification and the San Mateo County General Plan.[29][30] Implementation of the project would not result in the loss of availability of a known mineral resource of value to the region and residents of the State, nor of a locally important mineral resource recovery site. Therefore, no impact would occur.

[29] California Department of Conservation, *Mineral Land Classification.* Available: https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc. Accessed: January 2021.

[30] San Mateo County, *General Plan*. Available: https://planning.smcgov.org/general-plan. Available: January 2021.

13 Noise

Issues *Would the project result in:*	Significant or Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less than Significant	No Impact
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?	☐	☒	☐	☐
b) Generation of excessive groundborne vibration or groundborne 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 two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Setting

Rincon Consultants, Inc. prepared a Noise and Vibration Study in February 2021 to evaluate potential noise impacts associated with the project (**Appendix F**). This report includes background information on acoustics, noise standards applicable to the project, construction-period and operational noise impacts, and mitigation measures to reduce noise impacts.

Sensitive Receptors

Noise exposure goals for various types of land uses reflect the varying noise sensitivities associated with those uses. Noise sensitive receivers typically include residential uses, hospitals, convalescent homes, schools, and churches. Noise sensitive receivers near the site include single and multi-family residences located adjacent to the south and across Chestnut Street to the west.

Vibration sensitive receivers are similar to noise sensitive receivers, such as residences, and institutional uses, such as schools, churches, and hospitals. However, vibration sensitive receivers also include buildings where vibrations may interfere with vibration-sensitive equipment, affected by levels that may be well below those associated with human annoyance. Vibration sensitive receivers near the site include single and multi-family residences located adjacent to the south and across Chestnut Street to the west.

Project Noise Setting

As part of a previous study covering the same project site, Illingworth & Rodkin, Inc. performed a noise monitoring survey to quantify ambient noise levels in the project area (see **Appendix F**).

Noise levels were measured from Friday, November 14, 2014 through Tuesday, November 18, 2014. The survey included four 10-minute short-term (ST-1 through ST-4) and one 24-hour long-term noise measurement (LT-1) within the project vicinity. See **Table 13** for short-term measurement results. Measurement locations were selected to quantify baseline noise levels at representative sensitive receiver locations surrounding the project site. The primary source of noises at sensitive receivers surrounding the site were local traffic on Chestnut Street, local construction, and existing on-site activities. These measurements are considered representative of current site conditions as traffic levels and existing on-site operations on the project site are largely the same as when the measurements were conducted.

Table 13 Project Site Noise Monitoring Results – Short Term

Measurement	Location	Sample Times[1]	Primary Noise Source	dBA L_{eq}	dBA L_{max}
ST-1	715 Chestnut Street	11:10 – 11:20 a.m.	Traffic on Chestnut Street	63	73
ST-2	643 Buckeye Street	11:30 – 11:40 a.m.	Distant traffic, on-site operations	48	64
ST-3	End of Spruce Street	11:50 a.m. – 12:00 p.m.	Traffic on Woodside Road	61	73
ST-4	South of large building on project site	10:40 – 10:50 a.m.	Occasional on-site operations	55	69

Notes: dBA = A-weighed sound pressure level; L_{eq} = equivalent continuous sound level (i.e., the average noise level over the course of an hour); L_{max} = maximum instantaneous decibel reading

[1] Measurements taken on November 18, 2014, by Illingworth & Rodkin, Inc. (Appendix A within Appendix F).

Measurement location LT-1 was conducted at the northern terminus of Pine Street, directly south of the project site. This location was chosen to ascertain noise levels at the nearest residential area to the project. Hourly average daytime noise levels ranged from 50 to 60 dBA L_{eq} over the weekend at this location and from 53 to 62 dBA L_{eq} on weekdays. Hourly average nighttime noise levels dropped as low as 47 dBA L_{eq}. The L_{dn} at this location ranged from 59 to 62 dBA.

Applicable Noise Standards

San Mateo County Code of Ordinances

Chapter 4.88 (Noise Control) of the San Mateo County Code of Ordinances is intended to protect noise-sensitive receivers from annoying or disturbing noise generated at nearby properties.[31] Section 4.88.330 sets maximum exterior noise levels for activities on properties in the

[31] San Mateo County, *Code of Ordinances*. Available: https://library.municode.com/ca/san_mateo_county/codes/code_of_ordinances?nodeId=TIT4SAHE_CH4.88NOCO. Accessed: January 2021.

unincorporated County, as measured at single or multiple family residence, school, hospital, church, public library uses in either incorporated or unincorporated areas. Table 14 shows these exterior noise standards. Higher noise levels are permitted if the noise source operates for 15 minutes or less in a one-hour period. The exterior noise standards are more stringent during nighttime hours from 10 p.m. to 7 a.m.

Table 14 Exterior Noise Standards, dBA

Category	Cumulative Number of Minutes in Any One Hour Time Period	Daytime 7 a.m.—10 p.m.	Nighttime 10 p.m.—7 a.m.
1	30	55	50
2	15	60	55
3	5	65	60
4	1	70	65
5	0	75	70

Source: San Mateo County Code of Ordinances, Section 4.88.330.
Notes:
1) In the event the measured background noise level exceeds the applicable nose level standard in any category above, the applicable standard shall be adjusted in 5 dBA increments so as to encompass the background noise level.
2) Each of the noise standards specified above shall be reduced by 5 dBA for simple tone noises, consisting primarily of speech or music, or for recurring or intermittent impulsive noises.
3) If the intruding noise source is continuous and cannot reasonably be stopped for a period of time whereby the background noise level can be measured, the noise level measured while the source is in operation shall be compared directly to the noise level standards above.

Table 15 shows the County's interior noise standards at dwelling units, as written in Section 4.88.340.

Table 15 Interior Noise Standards, dBA

Category	Cumulative Number of Minutes in Any One Hour Time Period	Daytime 7 a.m.—10 p.m.	Nighttime 10 p.m.—7 a.m.
1	5	45	40
2	1	50	45
3	0	55	50

Source: San Mateo County Code of Ordinances, Section 4.88.340.
Notes:
1) In the event the measured background noise level exceeds the applicable nose level standard in any category above, the applicable standard shall be adjusted in 5 dBA increments so as to encompass the background noise level.
2) Each of the noise standards specified above shall be reduced by 5 dBA for simple tone noises, consisting primarily of speech or music, or for recurring or intermittent impulsive noises.
3) If the intruding noise source is continuous and cannot reasonably be stopped for a period of time whereby the background noise level can be measured, the noise level measured while the source is in operation shall be compared directly to the noise level standards above.

In addition to these quantitative noise standards, Section 4.88.350 sets a qualitative standard prohibiting "any unreasonably loud, unnecessary, or unusual noise which disturbs the peace and quiet of any neighborhood or which causes any discomfort or annoyance to any person of normal sensitivity residing in the area."

Section 4.88.360 lists exemptions from the provisions of the San Mateo County Code of Ordinances noise regulations, which include:

- Any mechanical device, apparatus, or equipment used, related to or connected with emergency machinery, vehicle, or work.
- Noise sources associated with demolition, construction, repair, remodeling, or grading of any real property, provided said activities do not take place between the hours of 6:00 p.m. and 7:00 a.m. on weekdays, 5:00 p.m. and 9:00 a.m. on Saturdays, or at any time on Sundays, Thanksgiving, and Christmas.

San Mateo County General Plan

Chapter 16 of the San Mateo County General Plan offers noise goals and objectives for the County, including: to 1) strive toward a livable noise environment, 2) reduce noise impacts through noise and land use compatibility and noise mitigation, 3) promote protection of noise sensitive land uses and noise reduction in quiet areas and noise impact areas, 4) give priority to reducing noise at the source rather than at the receiver, and 5) promote noise reduction through the use of techniques such as site planning, noise barriers, and architectural design and construction.[32]

The General Plan states that noise-sensitive land uses, such as residential neighborhoods, hotels, hospitals, schools, and outdoor recreation areas, must be protected from new development that causes discernable increases in noise levels as a result of on-site activities. Noise generators such as machinery or parking lots must be mitigated through physical measures or operational limits.

Redwood City Municipal Code

Because the San Mateo County Code of Ordinances does not specify noise regulations for construction activities, this analysis uses the standards established in the Redwood City Municipal Code (RCMC). Chapter 24 (Noise Regulation) of the RCMC promotes the health, safety, and general welfare of the public by regulating excessive and unreasonable noises. RCMC Section 24.31(A) prohibits noise levels generated by construction activities (including demolition, alteration, repair, or remodeling) to exceed 110 dBA as measured at any point within a residential district. In addition, RCMC Section 24.31(B) prohibits noise levels generated by individual pieces of machinery, equipment, or devices used during construction activities to exceed 110 dBA at a distance of 25 feet from said machinery, equipment, or device within a residential district.

[32] San Mateo County, *General Plan*. Available: https://planning.smcgov.org/general-plan. Available: January 2021.

Figure 7 **Noise Measurement Locations**

Discussion

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?

Less than Significant with Mitigation Incorporated. Project construction would not occur within the prohibited hours of the San Mateo County Code of Ordinances or the Redwood City Noise Ordinance (between 6:00 p.m. and 7:00 a.m. on weekdays, or at any time on Saturdays, Sundays, and holidays). Therefore, project construction hours would be consistent with both the San Mateo County Code of Ordinances and the Redwood City Noise Ordinance.

Project construction would occur nearest to sensitive receptors adjacent to the southern portion of the project site. Over the course of a typical construction day, project construction may operate at an average distance of 25 feet from the single-family backyard of 639 Pine Street and from the multi-family uses at 622-634 Chestnut Street and 95 feet from the multi-family uses across Chestnut Street (715 Chestnut Street). Although construction equipment may operate at closer distances than those listed above, during the course of a construction day the equipment would be mobile across the site and the average distance listed above is used for analysis purposes. **Table 16** shows the construction noise levels attributable to each construction phase modeled.

Table 16 Construction Noise Levels at Receivers

Phase	Construction Equipment[1]	Land Use	Distance to Receiver (feet)	Noise Level (dBA L_{eq} 8-hour)	Exceed Threshold?[2]
Demolition	Excavator, Man Lift, Crane	639 Pine Street, Single-Family/ 622-634 Chestnut Street, Multi-Family	25	85	No
		715 Chestnut Street, Multi-Family	95	73	No
Site Preparation	Dump Truck, Loader, Backhoe	639 Pine Street, Single-Family/ 622-634 Chestnut Street, Multi-Family	25	85	No
		715 Chestnut Street, Multi-Family	95	73	No

Phase	Construction Equipment[1]	Land Use	Distance to Receiver (feet)	Noise Level (dBA L_{eq} 8-hour)	Exceed Threshold?[2]
Building Construction	Crane, Man Lift, Compressor	639 Pine Street, Single-Family/ 622-634 Chestnut Street, Multi-Family	25	83	No
		715 Chestnut Street Multi-Family	95	73	No
Asphalt Paving	Compactor, Paver, Roller	639 Pine Street Single-Family/ 622-634 Chestnut Street Multi-Family	25	86	No
		715 Chestnut Street, Multi-Family	95	73	No

[1] Typical construction equipment for these phases was assumed.
[2] Applicable threshold is Redwood City's 110dBA residential threshold.
L_{eq}: one-hour equivalent noise level; L_{max}: instantaneous maximum noise level; dBA: A-weighted decibel

As shown in **Table 16**, noise levels at the residences to the south would not exceed Redwood City's construction noise threshold of 110 dBA; therefore, project construction would comply with relevant local noise requirements and impacts would be less than significant.

Operation

The project would introduce operational noise sources to the site, including condensers and a heat recovering unit. This equipment would not operate during the nighttime hours of 10 p.m. to 7 a.m.; therefore, a nighttime scenario was not analyzed.

The project would also use a 200-kW emergency generator, located at the southeastern edge of the project site near the southern property boundary. The generator would be located within a weatherproof and sound-attenuating enclosure. Per Section 4.88.360 of the San Mateo County Code of Ordinances, the generator's noise levels are exempt from noise limits during emergency operation. Testing to prepare for emergency operations would occur for 5 to 15 minutes biweekly or monthly during daytime hours. Since testing is for emergency preparation, it is considered exempt from noise limits by the County. In addition, while the generator may be perceptible to nearby receivers during testing, it would be of such short duration and infrequent use that it would not be considered a significant noise impact. Therefore, generator use is not discussed further in this analysis.

Daytime Scenario

As shown in **Table 17**, daytime operational noise levels from the project would exceed applicable noise standards at the single-family residences adjacent to the south (639 Pine Street and 633 Pine Street). Therefore, daytime operational noise levels are potentially significant.

Table 17 Daytime Operational Noise Levels

Noise Levels (dBA L_{eq})					
Receiver	**Land Use**	**Description**	**Heat Recovery Unit and Condensers (Exterior)**	**Heat Recovery Unit and Condensers (Interior)[1]**	**Exceed Threshold?[2]**
R1	Residential	729 Chestnut St.	19	0	No
R2	Residential	721 Chestnut St.	18	0	No
R3	Residential	715 Chestnut St.	20	0	No
R4	Residential	675 Hilton St.	20	0	No
R5	Residential	626 Hilton St.	22	2	No
R6	Residential	671 Chestnut St.	22	2	No
R7	Residential	627 Stambaugh St.	21	1	No
R8	Residential	622 Chestnut St.	23	3	No
R9	Residential	635 Chestnut St.	32	12	No
R10a	Residential	639 Pine St. (western property)	**67**	**47**	**Yes**
R10b	Residential	639 Pine St. (eastern property)	53	33	No
R11a	Residential	633 Pine St. (western property)	**56**	36	**Yes**
R11b	Residential	633 Pine St. (eastern property)	38	18	No
R12	Residential	627 Pine St.	28	8	No
R13	Residential	619 Pine St.	27	7	No
R14	Residential	607 Pine St.	25	5	No
R15	Residential	602 Pine St.	27	7	No
R16	Residential	620 Pine St.	30	10	No
R17	Residential	626 Pine St.	34	14	No
R18	Residential	632 Pine St.	35	15	No
R19	Residential	638 Pine St.	36	16	No
R20	Residential	644 Pine St.	39	19	No
R21	Residential	660 Pine St.	45	25	No
R22	Residential	655 Buckeye St.	41	21	No
R23	Residential	643 Buckeye St.	27	7	No
R24	Residential	654 Buckeye St.	35	15	No
R25	Residential	644 Buckeye St.	32	12	No
R26	Industrial	1900 Spring St.	33	13	N/A[3]
R27	Industrial	752 Chestnut St. (northern building)	37	17	N/A[3]

[1] In accordance with FHWA guidelines, an interior noise reduction of 20 dBA was assumed (FHWA 2018).
[2] In accordance with Section 4.88.330 of the San Mateo County Code of Ordinances, the applicable threshold is that operational noise shall not exceed an exterior noise level of 55 dBA or an interior noise level of 45 dBA L_{eq} at noise sensitive receivers.
[3] No applicable threshold because the uses are not noise-sensitive land uses; noise levels provided for informational purposes.

The following mitigation measure would be required to reduce this impact to a less-than-significant level.

> **Mitigation Measure NOI-1**: The project applicant shall reduce operational noise levels from the project's heat recovery unit and condensers to not exceed San Mateo County Code of Ordinances' daytime exterior and interior noise limits contained in Section 4.88.330, which states that during the daytime hours (7 a.m. to 10 p.m.), operational noise levels shall not exceed an exterior noise level of 55 dBA Leq or an interior noise level 45 dBA Leq.
>
> The project shall achieve consistency with the noise limits by one or more of the following measures:
>
> - Installation of an 8 -foot tall solid barrier on the southern property boundary where it abuts single-family residential properties. The barrier shall be constructed of a material with a minimum weight of 4 pounds per square foot with no gaps of perforations to the east, west, or south. Noise barriers may be constructed of, but are not limited to, masonry block, concrete panels, 1/8-inch thick steel sheets, 1-1/2-inch wood fencing, or 1/4-inch glass panels. If wood is used as the primary barrier component, the fence boards must overlap or be of "tongue and groove" construction with a joining compound between the boards to ensure there would be gaps or holes in the fence; and annual inspection and maintenance must be conducted for the life of the project to ensure the barrier continues to perform to the minimum requirements; and/or
> - Use of quieter equipment than analyzed; and/or
> - Move the equipment to a different part of the project site, further from the residences to the south. Examples include moving the heat recovery unit and condensers to the rooftop.
>
> These measures may be combined to achieve noise limit compliance (e.g., a six-foot barrier and moving the heat recovery unit slightly to the north). Revised site and detail plans implementing the selected measure or combination of measures shall be analyzed by a qualified noise consultant to determine that the project's operational noise levels would be consistent with San Mateo County Code of Ordinances' exterior and interior noise limits. This analysis shall be submitted to the County planning department for verification prior to the granting of building permits.

With implementation of **Mitigation Measure NOI-1,** noise levels at the potentially affected residences would not exceed the San Mateo County Code of Ordinances' noise limits, as shown in **Table 18**. **Table 18** assumes the 8-foot wall options is selected to reduce noise levels. However, the County may use any combination of measures included here or otherwise, so long as the performance standard established in **Mitigation Measure NOI-1** (i.e., compliance with the San Mateo County Code of Ordinances' exterior and interior noise limits) is met.

Table 18 Mitigated Daytime Operational Noise Levels

Noise Levels (dBA L_{eq})					
Receiver	**Land Use**	**Description**	**Heat Recovery Unit and Condensers (Exterior)**	**Heat Recovery Unit and Condensers (Interior)[1]**	**Exceed Threshold?[2]**
R10a	Residential	639 Pine Street (western property)	53	33	**No**
R10b	Residential	639 Pine Street (eastern property)	48	28	**No**

[1] In accordance with FHWA guidelines, an interior noise reduction of 20 dBA was assumed (FHWA 2018).
[2] In accordance with Section 4.88.330 of the San Mateo County Code of Ordinances, the applicable threshold is that operational noise shall not exceed an exterior noise level of 55 dBA or an interior noise level of 45 dBA L_{eq} at noise sensitive receivers.

b) Generation of excessive groundborne vibration or groundborne noise levels?

Less than Significant. Construction activities known to generate excessive ground-borne vibration, such as pile driving, would not be required. The greatest anticipated source of vibration during project construction activities would be from a dozer, which may be used within 25 feet of the nearest off-site structures to the north and south when accounting for setbacks. A dozer would create approximately 0.089 in/sec PPV at 25 feet. This would be lower than what is considered a distinctly perceptible impact for humans of 0.24 in/sec PPV, and the structural damage impact of 0.4 in/sec PPV. Therefore, although a dozer may be perceptible to nearby human receivers, temporary impacts associated with the dozer (and other potential equipment) would be less than significant.

Operation of the project would not include substantial vibration sources. Therefore, operational vibration impacts would be less than significant.

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 two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The project site is located approximately 3 miles southeast of the San Carlos Airport, approximately 20 miles northwest of the San Jose International Airport, and approximately 16 miles south east of the San Francisco International Airport. According to the Comprehensive Land Use Plans for each airport, the project is not located within the noise contours for the airports.[33] Therefore, no substantial noise exposure would occur to construction workers or users of the project site from aircraft noise, and no impact would occur.

[33] City/County Association of Governments of San Mateo County, *Comprehensive Airport Land Use Compatibility Plan For the Environs of San Carlos Airport.* Available: https://ccag.ca.gov/wp-content/uploads/2015/11/SQL_FinalALUCP_Oct15_read.pdf. Accessed: January 2021.

14 Population and Housing

Issues *Would the project:*	Significant or Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less than Significant	No Impact
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)?	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Setting

According to the California Department of Finance (DOF) the population of Redwood City was 85,925 in 2019. While population has been relatively stable in recent years, the Redwood City General Plan anticipates a population of approximately 91,900 by 2030.

A jobs-to-housing ratio is generated by dividing the number of jobs in a city by the number of housing units in the same city. A balance between jobs and housing can help to alleviate issues such as congestion and transportation-related environmental impacts by allowing people to work closer to their homes. Given the high cost of housing in California and in the Bay Area in particular, most households require more than one wage-earner to afford housing in the region. The jobs-to-housing ratio in the City was estimated at 1.11 in 2010 and grew to approximately 1.16 by 2020.[34]

Construction of large employment centers can induce population growth by enticing new employees to move from other locales. Population growth can also be induced through the creation of large housing development. In either case, rapid growth can disturb the jobs-housing balance of a city to create an imbalance and produce environmental impacts by increasing demand for services and infrastructure.

Discussion

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)?

Less than Significant. The project would be used for industrial/office use and does not include the construction of any residential units. The project would relocate existing jobs from one site in Redwood City to another. Existing industrial uses at the project would be replaced with a

[34] Association of Bay Area Governments, *Forecasts and Projections.* Available: https://abag.ca.gov/our-work/economic-analysis/forecasts-projections . Accessed: January 2021.

roughly equivalent industrial use introduced by the project. The project does not involve the extension of an existing road or infrastructure that would provide access to other portions of Redwood City and San Mateo County, and therefore, would not be considered growth inducing. Therefore, this impact would be less than significant.

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

No Impact. There is no housing existing or proposed on the project site; therefore, the proposed project would not displace existing housing, necessitating the construction of replacement housing elsewhere. No impact would occur.

15 Public Services

Issues *Would the project:*	Significant or Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less than Significant	No Impact
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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	☐	☐	☐	☒
ii) Police protection	☐	☐	☐	☒
iii) Schools	☐	☐	☐	☒
iv) Parks	☐	☐	☐	☒
v) Other public facilities	☐	☐	☐	☒

Setting

The Redwood City Fire Department provides fire prevention, medical response, and property protection services within Redwood City and would provide protection services for the project site. According to the Department, Redwood City contains seven fire stations including seven engines, one truck, and one battalion chief. The closest station is Station 9 located at 755 Marshall Street, approximately 0.5 mile away from the project site. In total, the department has over 90 staff members of which include firefighters, firefighter/paramedics, captains, fire prevention staff, training staff, and administrative staff. The Fire Department has a minimum of 8 firefighter/paramedics on duty at a time with a total of 27 firefighter/paramedics working for the department. The firefighter/paramedics are cross trained as firefighters meaning they offer an abundance of skills for emergency situations. On average, the Department can respond to an emergency scene in less than 4 minutes.[35]

The Redwood City Police Department provides police protection services for the project site. It is headquartered at 755 Marshall Street; approximately 0.5 mile from the project site. The police department consists of 96 sworn officers, 36 civilian employees, 4 reserve officers, and 25 volunteers. It polices a 19 square-mile urban center on the southern peninsula of San Mateo County and is currently overseen by Chief of Police, Dan Mulholland, appointed in 2018. The

[35] Redwood City Fire Department. Available: https://www.redwoodcity.org/departments/fire-department/about-the-department . Accessed: January 2021.

department is divided in three divisions of which include the Patrol Division, the Investigation Division, and the Administrative Services Division.[36]

Three public school districts serve Redwood City: The Redwood City School District (RCSD), the Belmont-Redwood Shores School District (BRSD), and the Sequoia Union High School District (SUHSD). The RCSD operates the majority of elementary schools, as well as two middle schools. The BRSD oversees two existing elementary schools within Redwood City. SUHSD operates Redwood City's four high schools (one of which is a continuation school), as well as two charter schools.[37]

Redwood City contains approximately 36 parks, including mini parks, neighborhood parks, community parks, and special facilities parks. The nearest park to the project site is Hoover Community Park (10.5 acres), which is approximately 1,100 feet southeast of the site.

There are four public library branches located within Redwood City. The Redwood City Public Library, located at 1044 Middlefield Road, is approximately 0.5 mile from the project site.[38]

There are three hospitals in Redwood City. The closest hospital to the project site is Kaiser Permanente Medical Center.[39]

Discussion

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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

No Impact. The project does not include plans for new residential development and would not substantially increase the population at the site or in the vicinity of the project. Implementation of the project would not generate a demand for increased fire protection services that would require additional staff, facilities, equipment, or construction of a new fire station.

The project would not result in the need for new or physically altered fire protection facilities. Therefore, no impact to fire protection services would occur and no mitigation is required.

[36] Redwood City Police Department. Accessed: https://www.redwoodcity.org/departments/police-department. Available: January 2021.
[37] Redwood City School and Education. Accessed: https://www.redwoodcity.org/residents/school-and-education. Available: January 2021.
[38] Redwood City Library. Accessed: https://www.redwoodcity.org/departments/library/locations-and-hours. Available: January 2021.
[39] Google Earth, 2021.

ii) Police protection

No Impact. The Redwood City Police Department would continue to serve the project site with implementation of the project. The project does not include plans for residential development and is not anticipated to result in any growth-inducing effects requiring additional police services. Therefore, no impact to police service would occur and no mitigation is required.

iii) Schools

and

iv) Parks

and

v) Other Public facilities

No Impact. The project does not include plans for residential development and is not anticipated to result in any growth-inducing effects that would require additional school services, parks and recreation facilities, or other public facilities including hospitals. The project would not result in the need for new of physically altered facilities, including schools, parks, or hospitals. Therefore, no impacts to schools, parks, or other facilities would occur.

16 Recreation

Issues		Significant or Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less than Significant	No Impact
a)	Would the project 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?	☐	☐	☐	☒
b)	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

Setting

Redwood City has approximately 233 acres of active developed parkland within Redwood City's sphere of influence, and approximately 700 acres of designated open space. Almost 20 percent of Redwood City's active parkland is associated with school facilities (including athletic fields and playgrounds). Other public park and recreational facilities in Redwood City include community centers, trails, and swimming pools. Redwood City has approximately 23 recreation sites that consist of 17 playgrounds, hiking trails, bocce ball courts, soccer fields, tennis courts, a golf range, and a recreation center. The nearest park to the project site is Hoover Park (10.18 acre); located approximately 600 feet east. [40,41]

Discussion

a) Would the project 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?

and

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

[40] Redwood City Park Locations. Available: https://www.redwoodcity.org/departments/parks-recreation-and-community-services/parks/park-locations. Accessed: January 2021.
[41] Google Earth, 2021.

No Impact. The project does not include any residential uses or increase population and therefore would have a minimal impact on existing neighborhood parks and facilities. Although future employees might use Redwood City parks or trails for running and similar outdoor exercise, this use would not place a major physical burden on existing parks and would not require the construction or expansion of recreational facilities. Therefore, no impact would occur.

17 Transportation

Issues ***Would the project:***		**Significant or Potentially Significant Impact**	**Less Than Significant Impact with Mitigation Incorporated**	**Less than Significant**	**No Impact**
a)	Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b)	Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c)	Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
d)	Result in inadequate emergency access?	☐	☐	☒	☐

Setting

Roadway Facilities

Regional Access

The project site is located in the southeastern portion of Redwood City. East of Whipple Avenue, north of State Route 82 (SR 82/El Camino Real), west of SR 84/Woodside Road, and south of Veterans Boulevard and US 101. SR 82/El Camino Real, SR 84/Woodside Road, and US 101 provide regional access to the project site. US 101 is a major north-south regional freeway that extends in an east-west direction within the project site and generally provides four mixed-flow lanes in each direction. During the a.m. and p.m. commute times, one lane in each direction is reserved for use by high occupancy vehicles. Access to the freeway is provided via the Veterans Boulevard/SR 84/Woodside Road interchange and the Whipple Avenue interchange.[42]

Local Access

Local access to the project site is provided via driveways on Chestnut Street and Spring Street. Chestnut Street travels east-west and is both a local and industrial two-lane street in the vicinity of the project area. An active railway line runs along the center of Chestnut Street, splitting east and west bound travelers. Portions of Chestnut Street are also designated as a proposed Class II or Class III bicycle lane. Spring Streets is a two-lane, north-south street serving lower traffic volumes, making it appropriate for bicycles as well.

[42] Google Earth, 2021.

Transit Facilities

Commuter rail service (Caltrain) station is located a little over one mile from the project site. Within the vicinity of the project area, the San Mateo County Transit District (SamTrans) offers bus lines 270, 276, 397, and FLX San Carlos route.

Pedestrian Facilities

Pedestrian facilities include sidewalks, crosswalks, pedestrian signal phases, curb ramps, curb extensions, and various streetscape amenities such as lighting, benches, etc. Pedestrian facilities are available in the project vicinity along both sides of Chestnut and Spring Streets

Discussion

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Less than Significant. As the County is serving as both property owner and project sponsor, the project is exempt from Redwood City plans, ordinances, and policies. The project does not require any physical changes to the existing roadway system, thus does not affect the existing roadway network nor conflict with existing circulation patterns or alternative transportation modes. The project proposes to introduce a land use which is compatible with existing uses on the project site. The project would not introduce new transportation patterns into the project area given the compatibility and similarity in proposed use to existing conditions.

Construction of the project would involve the demolition of the existing structure on-site and construction of a new radio service facility. Construction activities at the project site would not impact existing traffic patterns, as all construction vehicles, materials, and equipment storage can be accommodated on-site.

Given that the project is exempt from local plans and policies, and that the project does not require any physical changes to the existing roadway, the project would have a less-than significant impact related to applicable plans and policies.

b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Less than Significant. CEQA Guidelines Section 15064.3, subdivision (b) specifies the use of vehicle miles traveled (VMT) as a metric for determining transportation impacts. VMT refers to the amount and distance of automobile travel associated with a project. The guidelines state that land use projects would have a significant impact if the project would result in VMT exceeding an applicable significance threshold. The County of San Mateo has not yet adopted an applicable threshold of significance regarding VMT analysis, but generally, small projects, defined as generating 150 or fewer average daily vehicle trips, should be presumed to cause a less than significant transportation impact under CEQA[43].

[43] Fehr & Peers, *Redwood City Transportation Analysis Manual*. 2020. Available: https://www.redwoodcity.org/home/showpublisheddocument?id=22106. Accessed January 2021.

Project implementation would entail construction of a new, 13,000-square foot radio service facility. Although the County anticipates a reduction in vehicle activity on the project site as a result of the project, this analysis conservatively assumes that trips generated by the project site will remain the same as existing conditions. The County's prior radio service facility, which was demolished as part of a separate project, was located at 1320 Marshall Street, approximately 0.5 mile south of the current project site. Trips generated from operation the project would be similar to those generated for the prior radio service facility and VMT would not change substantially, given the proximity of the new service facility. Further, it is unlikely that project operation would result in 100 or more peak hour trips, particularly since vehicles serviced by the radio facility are typically used throughout work hours, and less so during peak commuting periods.

Given the above, VMT generated by the project would be similar to existing conditions and would be consistent with CEQA Guidelines Section 15064.3, subdivision (b). As such, the project would have a less-than significant impact related to VMT.

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

No Impact. The project does not include any changes to local streets or intersections, nor does it include any new curb cuts to or from public roadways. Access to the project site will utilize two existing driveways which currently provide access to the site from Spring Street and Chestnut Street. Additionally, the project site includes ample on-site circulation area. The project would not introduce or significantly increase hazards due to design features or incompatible uses. Therefore, no impact would occur.

d) Result in inadequate emergency access?

Less than Significant. Emergency access would be provided via Chestnut Street and Spring Street. As the project site proposes to be accessible from existing driveways; emergency vehicles would continue to be able to access the project site without any difficulty. Therefore, the impact on emergency access would be less than significant.

18 Tribal Cultural Resources

Issues *Would the project:*	Significant or Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less than Significant	No Impact
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 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)?	☐	☐	☐	☒
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 Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

Setting

Information in this section was incorporated from a Sacred Lands File search completed for the project site and a CHRIS records search both conducted in November 2014.

Cultural resources are generally defined as traces of human occupation and activity that include prehistoric and historic archaeological sites, districts, and objects; standing historic structures buildings, districts, and objects; and locations of important historic events of sites of traditional and/or cultural importance to various groups. Specifically, the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1 protect the following resources:

> 5024.1(c): A resource may be listed as an historical resource in the California Register if it meets any of the following NRHP criteria:
>
> > (1) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
> >
> > (2) Is associated with the lives of persons important in our past.

(3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.

(4) Has yielded, or may be likely to yield, information important in prehistory or history.

An existing 2,700 square-foot one-story building used for County pest control services along the western property line would be replaced with a new 13,000 square-foot two-story radio service facility in the same location. The maximum depth of excavation is anticipated to be between 8 and 10 feet bgs. The new building would contain both office space and a service garage to work on County vehicles and radio equipment. Condensers and a heat recovering unit would be located on the east side of the new building. An emergency generator would be located east of the new building near the southern property line.

Discussion

i. Cause a substantial adverse change in the significance of a tribal cultural resource 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)?

No Impact. Based on the literature search, site reconnaissance, and assessment of the existing buildings by an architectural historian, no historic properties listed, determined eligible, or potentially eligible for inclusion on the National Register of Historic Places and/or the CRHR have been identified in or adjacent to the project site. Based on an assessment of the buildings by an architectural historian, the buildings on project site that are proposed for demolition are not eligible for the CRHR. Additionally, the NWIC base maps show no recorded buildings or structures within the project site. Therefore, no impact would occur to a tribal cultural resources listed or eligible for listing in the CRHR or other local register.

ii. Cause a substantial adverse change in the significance of a tribal cultural 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 Section 5024.1?

Less than Significant with Mitigation Incorporated. As stated above in **Section 2.5, Cultural Resources**, there are no known archaeological or built historic resources on the project site, and the likelihood to encounter archaeological or other buried cultural resources is moderately low.

A Sacred Lands File search was requested on November 14, 2014. The Sacred Lands File, operated by the NAHC, is a confidential set of records containing places of religious or social significance to Native Americans. A response from the NAHC was received on November 19, 2014 and indicated that Native American cultural sites have not previously been identified on the project site. The NAHC recommended consultation with six tribes associated with the region. On November 24, 2014, San Mateo County sent email notifications to the following Native American tribes: Indian Canyon Mutsun Band of Costanoan, Muwekma Ohlone Indian Tribe of the SF Bay Area, The Ohlone Indian Tribe, Trina Marine Ruano Family, Amah Mutsun

Tribal Band of Mission San Juan Bautista, Coastanoan Rumsen Carmel Tribe and Trina Marine Ruano Family. The emails were followed with letters mailed to each Tribe on November 24, 2014. The emails and letters contained information about the project; an inquiry for any unrecorded Native American cultural resources or other areas of concern within or adjacent to the project site; and a solicitation of comments, questions, or concerns with regard the project. To date, no responses have been received. The tribes that were identified and contacted by San Mateo County and will be given notice of the availability of this Draft IS to ensure that they have the opportunity to comment on the project during the public circulation period.

In addition to tribal consultation should it be requested, implementation of **Mitigation Measure CUL-1** would ensure any previously unidentified Native American archaeological resources or remains encountered during construction are handled appropriately. In the event that human remains are discovered during construction, the project applicant would comply with the California Health and Safety Code Section 7050.5 regarding human remains, and the California Public Resources Code Section 5097.98 regarding the treatment of Native American human remains. In the event that human remains are discovered during project construction, all activity within a 50-foot radius of the site shall be halted. The San Mateo County Coroner would be notified and would make a determination as to whether the remains are of Native American origin or whether an investigation into the cause of death is required. With implementation of these mitigation measures, impacts to tribal cultural resources would be less than significant.

19 Utilities and Service Systems

Issues *Would the project:*		Significant or Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less than Significant	No Impact
a)	Require or result in the relocation or construction of new or expanded water, wastewater or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b)	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐
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?	☐	☐	☒	☐
d)	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?	☐	☐	☒	☐
e)	Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Setting

Water

Redwood City's potable municipal water supply is provided by the Hetch-Hetchy regional water system operated by the San Francisco Public Utilities Commission (SFPUC). Redwood City's recycled water system provides non-potable water supply. Redwood City does not use groundwater as a municipal potable water source.[44]

Wastewater

South Bayside System Authority treatment plant provides wastewater services for Redwood City. According to the Redwood City General Plan, the South Bayside System Authority

[44] Redwood City Water Quality. Available: https://www.redwoodcity.org/departments/public-works/water/waterquality#:~:text=Currently%2C%20all%20Redwood%20City's%20drinking,people%20in%20the%20Bay%20Area.. Accessed: January 2021.

treatment plant has an operating capacity of 29 million of gallons per day (mgd) average dry weather flow (ADFW) and has plans to expand capacity allocation over a 10-to-15-year time frame.[45]

Solid Waste

Redwood City generates 88,921 tons of solid waste per year, mostly from commercial and institutional users. Approximately 90 percent of the solid waste collected from Redwood City is sent to the Ox Mountain Sanitary Landfill. Ox Mountain Landfill anticipates to reach capacity in the year 2039.[46]

Discussion

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

Less than Significant. The existing storm drainage, joint trench, water services, and sewer services on-site would remain, but may undergo some modifications to accommodate new site design. Additionally, new drainage infrastructure is proposed at the project site with the intention of maintaining the existing flows and direction of stormwater runoff. Therefore, the project would result in a less than significant impact to drainage capacity.

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

Less than Significant. The project site is already developed and receives potable water and wastewater services from Redwood City. Given the types of uses proposed, it is likely that the demand for water and wastewater treatment services could slightly increase. Relocating the Motor Pool site could slightly increase the amount of water and wastewater demand compared to existing conditions at the specific site for car washing, servicing, etc. However, because the Motor Pool is an existing facility within the water/wastewater service area, moving to a new location would not increase the project's water and wastewater demand as a whole. The project site is served by the same utility providers and would not cause a new impact. Therefore, such services could accommodate the project and would not require construction of new facilities. Municipal water and wastewater services within Redwood City both have available capacity; therefore, such services could accommodate the project. The impact is less than significant, and no mitigation is required.

[45] Redwood City General Plan. Available at: https://www.redwoodcity.org/departments/community-development-department/planning-housing/planning-services/general-plan-precise-plans/general-plan. Accessed: January 2021.
[46] Redwood City General Plan. Available at: https://www.redwoodcity.org/departments/community-development-department/planning-housing/planning-services/general-plan-precise-plans/general-plan. Accessed: January 2021.

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?

Less than Significant. As stated above, the proposed project would not increase the amount of water and wastewater demand compared to existing conditions (see discussion for questions 19.a and 19.b). Compared to existing conditions, the project is anticipated to result in an overall reduction in wastewater generation. Therefore, the project would not require the construction of new water or wastewater treatment facilities, and any impacts would be less than significant. No mitigation is required.

d) 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?

Less than Significant. No new or expanded landfills facilities would be required due to implementation of the project. Future uses at the project site would be similar to current solid waste generations and would not exceed State or local standards. Therefore, this impact would be less than significant.

e) Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?

Less than Significant. The project consists of proposed industrial land uses which would not result in the generation of unique types of solid waste that would conflict existing regulations applicable to solid waste disposal. San Mateo County would continue to comply with existing federal, State, and local regulations. The impact is less than significant, and no mitigation is required.

20 Wildfire

Issues *Would the project:*	Significant or Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less than Significant	No Impact
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?	☐	☐	☒	☐

Setting

The project site is in an established neighborhood that contains a mix of existing land uses. The project site is bordered by a one-story retail building to the east and a single-family residential neighborhood to the south. The majority of the site is paved. The California Department of Forestry and Fire Protection identifies fire hazards based on relevant factors such as fuels, terrain, and weather. There are no Fire Hazard Severity Zones (FHSZ) within the urbanized portion of San Mateo County that are ranked with moderate to high fire susceptibility. The project site is located within an area of Local Responsibility Area (LRA), which extends throughout most of the City. Within the LRA, the project site is designated as Non-Very High Fire Hazard Severity Zone (VHFHSZ).[47]

[47] California Fire Hazard Severity Zone Viewer. Available: https://gis.data.ca.gov/datasets/789d5286736248f69c4515c04f58f414. Accessed: January 2021.

Discussion

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

and

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?

and

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?

and

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?

Less than Significant. As mentioned above in **Section 9, Hazards and Hazardous Materials**, there are no formal evacuation routes or emergency response plans near the project site that would be impacted by the project. The existing land uses local to the project preclude factors such as slopes or strong winds from exacerbating wildlife risk. The topography of the surrounding area is generally flat and dense development prevents strong winds. Similarly, post-fire impacts such as drainage changes and landslides would not occur as the project site and its surroundings are highly urbanized and flat and do not have any steep slopes or hillsides that would be susceptible to landslides or flooding. The project would not require the installation or maintenance of infrastructure that may exacerbate fire risk. Further, the project site is not located within a FHSZ. Therefore, this impact would be less than significant.

21 Mandatory Findings of Significance

Issues		Significant or Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less than Significant	No Impact
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?	☐	☒	☐	☐
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)?	☐	☒	☐	☐
c)	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Discussion

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?

Less than Significant with Mitigation Incorporated. As described throughout this document, the project would not substantially degrade the quality of the environment. The project site is located in a densely developed area and contains no valuable or sensitive habitats. As described in **Section 4, Biological Resources**, the project as proposed does not have the potential to substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife species population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. As described in **Section 5, Cultural Resources**, implementation of identified mitigation measures

would reduce potential impacts to subsurface archaeological resources and human remains to a less than significant level. Implementation of the mitigation measures and standard County procedures identified in **Section 5, Cultural Resources** would reduce potential impacts on unknown prehistoric Native American remains and important examples of major California history and prehistory to a less than significant level if they are uncovered as a result of construction activities.

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)?

Less than Significant with Mitigation Incorporated. A cumulative impact refers to a project's incremental effect together with other closely related past, present, and reasonably foreseeable future projects whose impact may compound or increase the incremental effect of the project. The project would not have impacts to aesthetics, agricultural resources, greenhouse gas emissions, hydrology and water quality, land use and planning, mineral resources, population and housing, public services, recreation, transportation and circulation, or utilities and service systems. The project would potentially result in site-specific impacts to cultural resources, biology, geology and soils, hazards and hazardous materials, air quality, and noise, but would not combine with off-site impacts. However, incorporation of mitigation measures would reduce impacts to these resources to less-than-significant levels as identified in **Section 3, Air Quality**; **Section 4, Biological Resources**; **Section 5, Cultural Resources**; **Section 6 Geology and Soils**; **Section 8 Hazards and Hazardous Materials**; **Section 9, Hydrology and Water Quality**; and **Section 12, Noise.**

Future development of the areas in vicinity of the project site was considered and forecasted in both the Redwood City General Plan EIR and Redwood City Downtown Precise Plan EIR. The Redwood City General Plan EIR forecasted a build-out analysis to the year 2030, while the Downtown Precise Plan forecasted build-out to the year 2033 to capture the potential growth in the area. The General Plan EIR identified significant and unavoidable impacts to the future demand for water supply and tidal inundation in susceptible areas related to sea level rise. The Redwood City Downtown Precise Plan EIR identified significant and unavoidable impacts to intersections and freeway ramps outside the immediate vicinity of the project area, as well as flooding impacts related to sea level rise. The project would not result in individual impacts to traffic, hydrology/water quality and other areas that would result in broader regional impacts. The project's contribution to significant cumulative impacts to traffic and hydrology/water quality would not be considerable.

Given that all potential project impacts would be reduced to a less-than-significant level through mitigation, there would not be any cumulatively considerable impacts.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less than Significant with Mitigation Incorporated. The implementation of the mitigation measures identified herein would reduce all potential impacts to a less-than-significant level. Therefore, the project would thus not result in impacts that would cause substantial adverse effects on human beings, either directly or indirectly.

REFERENCES

Air Quality and Greenhouse Gas Study, Rincon Consultants 2020.

Association of Bay Area Governments, *Forecasts and Projections.* Available: https://abag.ca.gov/our-work/economic-analysis/forecasts-projections. Accessed: January 2021.

Bay Area Air Quality Management District, *BAAQMD CEQA Air Quality Guidelines*, 2017. Available: https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en. Accessed: January 2021.

California Department of Conservation, Division of Land Resource Protection. Farmland Mapping & Monitoring Program. Available: https://maps.conservation.ca.gov/DLRP/CIFF/. Accessed: January 2021.

California Department of Transportation. California Scenic Highway Mapping System. Available: https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways . Accessed: January 2021.

California Energy Commission (CEC), *Building Energy Efficiency Standards*, 2019. March. Available at: https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency. Accessed January 2021.

California Fire Hazard Severity Zone Viewer. Available: https://gis.data.ca.gov/datasets/789d5286736248f69c4515c04f58f414. Accessed: January 2021.

California Geological Survey. 2002. Earthquake Zones of Required Investigation. Available: https://maps.conservation.ca.gov/cgs/EQZApp/app/. Accessed: January 2021.

City/County Association of Governments of San Mateo County, *Comprehensive Airport Land Use Compatibility Plan for the Environs of San Carlos Airport.* Available: https://ccag.ca.gov/wp-content/uploads/2015/11/SQL_FinalALUCP_Oct15_read.pdf. Accessed: January 2021.

County of San Mateo, Dam Failure Inundation Areas - San Mateo County. Available: https://planning.smcgov.org/sites/planning.smcgov.org/files/documents/files/Dam_Failure_Inundation.pdf. Accessed: January 2021.

Department of Conservation, *Mineral Land Classification.* Available: https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc. Accessed: January 2021.

Department of Conservation, *Tsunami Inundation Map*. Available: https://www.conservation.ca.gov/cgs/Documents/Publications/Tsunami-Maps/Tsunami_Inundation_RedwoodPointPaloAlto_Quads_SanMateo.pdf. Accessed: January 2021.

Department of Conservation. *Williamson Act/Land Conservation Act*, 2016. Available: https://www.conservation.ca.gov/dlrp/wa. Accessed: January 2021.

Department of Conservation, *California Important Farmland Finder.* Available: https://maps.conservation.ca.gov/DLRP/CIFF/. Accessed: January 2021.

Erler & Kalinowski, Inc, *2015 Urban Water Management Plan for the City of Redwood City,* 2016. Available: http://www.redwoodcity.org/home/showdocument?id=8091. Accessed: January 2021.

Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*. Available: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf. Accessed: January 2021.

Fehr & Peers, *Redwood City Transportation Analysis Manual*. 2020. Available: https://www.redwoodcity.org/home/showpublisheddocument?id=22106. Accessed January 2021.

Geotechnical Investigation Redwood City Motor Pool, Fugro Consultants, Inc. 2014.

Google Earth, 2021.

H. T. Harvey & Associates, 2020. Biological Resources Technical Memorandum.

H. T. Harvey & Associates, 2020. 752 Chestnut Street Redevelopment Project – Biological Resources Survey Report Update.

Native American Heritage Commission (NAHC), 2014. Record search of the NAHC Sacred Lands File.

Pacific Gas and Electric Company, *Energy Efficiency Business Plan*. Available: https://www.pge.com/pge_global/common/pdfs/for-our-business-partners/energy-efficiency-solicitations/PGE-Energy-Efficiency-Business-Plan.pdf. Accessed: January 2021.

Redwood City, Code of Ordinances, *Chapter 35 – Tree Preservation.* Available: https://library.municode.com/ca/redwood_city/codes/code_of_ordinances?nodeId=CH35TRPR#TOPTITLE. Accessed: January 2021.

Redwood City Fire Department. Available: https://www.redwoodcity.org/departments/fire-department/about-the-department. Accessed: January 2021.

Redwood City General Plan. Available at: https://www.redwoodcity.org/departments/community-development-department/planning-housing/planning-services/general-plan-precise-plans/general-plan. Accessed: January 2021.

Redwood City Library. Accessed: https://www.redwoodcity.org/departments/library/locations-and-hours. Available: January 2021.

Redwood City Park Locations. Available: https://www.redwoodcity.org/departments/parks-recreation-and-community-services/parks/park-locations. Accessed: January 2021.

Redwood City Police Department. Accessed: https://www.redwoodcity.org/departments/police-department. Available: January 2021.

Redwood City School and Education. Accessed: https://www.redwoodcity.org/residents/school-and-education. Available: January 2021.

Redwood City Water Quality. Available: https://www.redwoodcity.org/departments/public-works/water/waterquality#:~:text=Currently%2C%20all%20Redwood%20City's%20drinking,people%20in%20the%20Bay%20Area.. Accessed: January 2021.

Redwood City, *Downtown Precise Plan*. Available: https://www.redwoodcity.org/departments/community-development-department/planning-housing/planning-services/general-plan-precise-plans/downtown-precise-plan. Accessed: January 2021.

Redwood City General Plan, *Environmental Impact Report.* Available: https://www.redwoodcity.org/departments/community-development-department/planning-housing/planning-services/environmental-documents/general-plan-eir. Accessed: January 2021.

Santa Clara Valley, 2018. Habitat Agency Browser. Available: http://www.hcpmaps.com/habitat/. Accessed: January 2021.

San Mateo County, *Code of Ordinances*. Available: https://library.municode.com/ca/san_mateo_county/codes/code_of_ordinances?nodeId=TIT4SAHE_CH4.88NOCO. Accessed: January 2021.

San Mateo County, *General Plan*. Available: https://planning.smcgov.org/general-plan. Available: January 2021.

San Mateo County, *San Mateo County Energy Efficiency Climate Action Plan*, 2013. June. Available at: https://planning.smcgov.org/sites/planning.smcgov.org/files/documents/files/SanMateoCounty_EECAP_FINAL_06-04-2013.pdf. Accessed January 20201.

State of California, *Municipal Stormwater Program.* Available https://www.waterboards.ca.gov/water_issues/programs/stormwater/municipal.html. Accessed: January 2021.

San Mateo County, *General Plan*. Available: https://planning.smcgov.org/general-plan. Available: January 2021.

San Mateo County, *San Mateo County Scenic Corridors Map.* Available: http://planning.smcgov.org/documents/san-mateo-county-scenic-corridors. Accessed: January 2021.

TRC Solutions, 2014. Summary of Soil and Groundwater Quality Assessments Motor Pool Project (Grant Yard).

TRC Solutions Protech, 20164. *Phase I – Environmental Site Assessment.*

752 Chestnut Street Radio Service Facility Project Energy Analysis, Rincon Consultants 2020.