

RESOLUTION NO. 16103

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF REDWOOD CITY ADOPTING CEQA FINDINGS OF FACT, STATEMENT OF OVERRIDING CONSIDERATIONS, AND MITIGATION MONITORING AND REPORTING PROGRAM; AND CERTIFYING THE FINAL SUBSEQUENT ENVIRONMENTAL IMPACT REPORT FOR THE REDWOOD CITY TRANSIT DISTRICT DOWNTOWN PRECISE PLAN AMENDMENTS (SCH NO. 2021080554)

WHEREAS, in 2011, the City adopted the Downtown Precise Plan (“DTPP”) to establish new land use and development regulations that would produce a unique and robust Downtown within the context of a rich, historic and valued built environment, and concurrently with adoption of the DTPP certified the Final Environmental Impact Report for the DTPP (“DTPP Final EIR”; SCH No. 2006052027); and

WHEREAS, on November 4, 2019, the City Council of the City of Redwood City (“City Council”) directed staff to schedule future City Council consideration of a Transit Sub-district of the DTPP; and

WHEREAS, on January 13, 2020, the City Council adopted an updated Strategic Plan that prioritized, among other things, goals related to housing, transportation, and children and youth, and

WHEREAS, on January 13 and 27, 2020, the City Council also provided direction to City staff to move forward with a community visioning process for creation of the Transit District; and

WHEREAS, on February 24, 2020, the City Council initiated General Plan and DTPP amendments for the proposed Transit District, which area and regulations would include the Sequoia Station Development Project (approximately 12 acres), the Transit Center (approximately 2.1 acres) and the Perry Parcel used for Caltrain parking (approximately 2.5 acres); and

WHEREAS, on January 25, 2021, and February 8, 2021, the City Council held study sessions on the creation of the Transit District and associated General Plan and DTPP Amendments (the “Project”) and took public comments; and

WHEREAS, the Project includes, but is not limited to, the following:

- Amendments to the General Plan, including revisions to the Mixed Use-Downtown maximum allowable development cap to create an office cap for the Transit District that is distinct from, and not subject to, the office cap applicable to the remainder of the DTPP, and the addition of residential development potential cleared under the California Environmental Quality Act (“CEQA”);
- Amendments to the DTPP comprised of: establishing the Transit District as a new sub- area within the DTPP with supplemental controls; creating a maximum allowable development office cap specific to the Transit District that is distinct from, and not subject to, the office cap applicable to the remainder of the DTPP; adding residential development potential cleared under CEQA that is distinct from, and not subject to, the development potential cleared under CEQA for the remainder of the DTPP; adjusting minimum heights and massing regulations; revising the DTPP New Streets (Circulation) Regulations and associated maps; establishing Parking Regulations for the Transit District with lower vehicle parking and higher bicycle parking requirements to reflect anticipated future parking demand; revising the DTPP maps to accommodate potential future relocation of the Caltrain station; revising the DTPP Public Frontages and Use Regulations; allowing for exceptions to certain mandatory Standards for sites identified as potentially providing privately owned publicly accessible open space; adding Contemporary design to the permitted list of architectural styles; and amending various maps, figures, and charts to implement the foregoing; and

WHEREAS, the City determined that the Project would be subject to CEQA (Public Resources Code section 21000 et seq.), and the CEQA Guidelines (Title 14, sections 15000 et seq. of the California Code of Regulations); and

WHEREAS, pursuant to CEQA Guidelines section 15162, a subsequent environmental impact report (“SEIR”) is required if the City determines that there have been substantial changes to the project and/or the circumstances under which the project is undertaken, or substantial new information has arisen, and that one or more of the

foregoing will result in new or substantially more severe impacts and that thus major revisions to the prior environmental impact report and/or new mitigation measures or alternatives are now feasible; and

WHEREAS, the City determined that the Project would require the preparation of an SEIR to substantially revise the DTPP Final EIR because of the reasonable potential that the Project would result in new or substantially more severe significant environmental effects than those identified in the certified DTPP Final EIR; and

WHEREAS, pursuant to CEQA section 21092, the City issued a Notice of Preparation (“NOP”) for the SEIR to solicit input on the environmental analysis of the Project and submitted the NOP to the Office of Planning and Research State Clearinghouse and interested agencies and persons on August 27, 2021, for a 31-day review period; and

WHEREAS, the City prepared a Draft Subsequent Environmental Impact Report (“DSEIR”; SCH 2021080554) for the Project and circulated it for public comment for 47 days from May 6, 2022, to June 21, 2022, and copies of the DSEIR were made available on the City’s website and in hard copy for review by the public and responsible and trustee agencies, and all were invited to submit comments on the DSEIR to the City’s Community Development and Transportation Department; and

WHEREAS, on June 21, 2022, the Planning Commission held a public hearing to receive additional verbal and written comments on the DSEIR; and

WHEREAS, following the completion of the public review period, the City reviewed all comments received on the DSEIR and prepared a Final Subsequent Environmental Impact Report (the “FSEIR”) which incorporates the DSEIR by reference, includes all comments received during the public review period and responses to those comments, describes changes to the DSEIR that resulted from the comments received, and includes a Mitigation Monitoring and Reporting Program; and

WHEREAS, the FSEIR identified a Reduced Office Alternative which would retain all General Plan and DTPP amendments proposed by the Project, but which would alter the Project as follows:

- Establish an office development cap for the Transit District area of 1.23 million square feet, which is about 75 percent of the office development cap proposed under the Project (i.e., 1.63 million square feet); and

WHEREAS, the Reduced Office Alternative meets the objectives of the Project and produces similar or slightly reduced environmental impacts, including impacts related to the intensity of development. Impacts related to traffic (including traffic that might potentially interfere with emergency evacuation plans); criteria air pollutant, toxic air contaminant, and greenhouse gas emissions; noise and vibration; population or employment; and demand for public services and utilities, would generally be reduced compared to those of the Project; and

WHEREAS, all persons who commented on the DSEIR were notified of the availability of the FSEIR on October 14, 2022, which is at least 10 days before the City Council held a public hearing to consider the Project; and

WHEREAS, CEQA section 21081.6 requires the City to adopt a mitigation monitoring and reporting program (“MMRP”) because mitigation is required and the MMRP for the Project has been made available to the public with the FSEIR; and

WHEREAS, CEQA Guidelines section 15093 requires the City to adopt a Statement of Overriding Considerations (“SOC”) before approving a project that will result in the occurrence of significant and unavoidable effects which are identified in the FSEIR, and the City has evaluated the economic, legal, social, technological, and other benefits of the Project and prepared the SOC included in the “Findings and Statements Required by CEQA” attached hereto as Exhibit A; and

WHEREAS, on October 25, 2022, the Planning Commission held a duly noticed public hearing as required by state law, Redwood City Zoning Code Article 52.5, and Redwood City Municipal Code section 18.62, reviewed the project, and voted unanimously to recommend certification to the City Council on the proposed Project and the FSEIR; and

WHEREAS, on November 28, 2022, the City Council held a duly noticed public hearing as required by state law, Redwood City Zoning Code Article 52.5, and Redwood

City Municipal Code section 18.67 to consider approval of the Project, certification of the SEIR and adoption of CEQA Findings of Fact, and adoption of a Statement of Overriding Considerations and a Mitigation Monitoring and Reporting Program.

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF REDWOOD CITY AS FOLLOWS:

SECTION 1. The City Council, having independently heard, considered, and weighed all the evidence in the administrative record, including but not limited to the staff reports; the FSEIR (including the Mitigation Monitoring and Reporting Program, all appendices, and associated Errata); the Findings and Statements Required by CEQA attached hereto as Exhibit A and incorporated herein; and all other documents, reports, studies, memoranda, maps, oral and written testimony, and materials in the City's file for the Project; and all adopted City planning documents relating to the Project including the City's General Plan, Municipal Code, Zoning Ordinance, and other applicable City laws and regulations (collectively, the "Record"); finds that this Record serves as an adequate and appropriate evidentiary basis for the findings and actions set forth in this Resolution and is hereby incorporated by reference.

SECTION 2. The City Council makes and adopts, based on its independent judgment and analysis, the Findings and Statements Required by CEQA set forth in Exhibit A, including the Statement of Overriding Considerations, and further adopts the Mitigation Monitoring and Reporting Program as set forth in the FSEIR.

SECTION 3. The City Council finds, based on its independent judgment and analysis, that the FSEIR, which is on file in the Office of the City Clerk of the City of Redwood City, and incorporated by this reference, is hereby certified based on the Findings and Statements Required by CEQA attached hereto as Exhibit A as well as the following:

- a. The City of Redwood City is the lead agency under CEQA for preparing the FSEIR and is the entity with final decision-making authority with regard to approval of the Project.
- b. The FSEIR has been completed in compliance with CEQA Statutes and Guidelines and applicable provisions of the Redwood City Municipal Code.
- c. The FSEIR has been reviewed and considered by the Planning Commission prior to the Council's rendering of any decision regarding the approval of the Project.
- d. The FSEIR reflects the City's independent judgment and has been found by the City to be adequate to support the City's approval of the Project.
- e. The information added in the FSEIR and Errata does not constitute new significant information requiring recirculation.

f. Based on the City's review of the FSEIR, it has been determined that the Project may have significant and unavoidable effects on the environment, but the benefits of implementation of the Project outweigh those impacts as described in the Findings and Statements Required by CEQA and Statement of Overriding Considerations described in section (h) below.

g. Pursuant to Section 15091 of the CEQA Guidelines, the City's actions with respect to the Project are based upon the Findings and Statements Required by CEQA and Statement of Overriding Considerations attached hereto as Exhibit A and incorporated herein by reference, which findings are supported by substantial evidence in the record.

h. Specific economic, legal, social, technological, or other benefits outweigh the unavoidable adverse environmental effects identified in the FSEIR.

i. Pursuant to Section 15091 of the CEQA Guidelines, any subsequent actions or approvals to implement the project shall be based upon and subject to the findings, conclusions, mitigation measures and statements set forth in the FSEIR (including the MMRP) and the Findings and Statements Required by the California Environmental Quality Act and Statement of Overriding Considerations attached hereto as Exhibit A.

SECTION 4. The City Council further finds that the Reduced Office Alternative contained in the FSEIR meets the objectives of the Project and produces similar or slightly reduced environmental impacts, including impacts related to the intensity of development as described on pages 2.27-2.35 of the FSEIR, and that specifically impacts related to traffic (including traffic that might potentially interfere with emergency evacuation plans); criteria air pollutant, toxic air contaminant, and greenhouse gas emissions; noise and vibration; population or employment; and demand for public services and utilities, would generally be reduced compared to those of the Project such that approval of the Reduced Office Alternative would be appropriate concurrently with certification of the FSEIR.

SECTION 5. This resolution shall go into effect immediately upon adoption.

* * *

EXHIBIT A
Findings and Statements Required by CEQA

Redwood City Transit District
DTPP Amendments Subsequent EIR

Findings and Statements Required by the
California Environmental Quality Act
(Public Resources Code Section 21000 *et seq*)

I. Introduction

On behalf of the City of Redwood City (the “City”), and pursuant to the California Environmental Quality Act (“CEQA”) and Title 14, Chapter 3 of the California Code of Regulations (the “CEQA Guidelines”), the City’s Planning Division has prepared a Subsequent Environmental Impact Report (the “SEIR”) to the Downtown Precise Plan Final EIR (DTPP FEIR) for the Transit District DTPP Amendments project (the “Project”). The City is the lead agency for the SEIR.

To support its certification of the SEIR and approval of the Project, the City Council of the City of Redwood City makes the following findings of fact and statement of overriding considerations (collectively, the “Findings”). These Findings contain the City Council’s written analysis and conclusion regarding the Project’s environmental effects, mitigation measures, alternatives to the proposed Project, and the overriding considerations which, in the City Council’s view, justify the approval of the Project despite its potential environmental effects. These Findings are based upon the entire record of proceedings for the SEIR, as described below.

II. Background

The DTPP established a contemporary vision for the Downtown area and set forth specific land use parameters, development standards, architectural guidelines, and urban design criteria in order to create a unique and vibrant Downtown. The project consisted of the adoption and implementation of a DTPP. Article 52 of the City’s Zoning Ordinance provides for the development, adoption and implementation of ‘precise plans’ to govern land use and establish development and design guidelines applicable to specific areas of the City. The City Planning Division prepared the DTPP pursuant to Sections 52.4 and 52.5 of the City’s Zoning Ordinance.

On January 24, 2011, the City Council:

- certified the Final EIR prepared for the DTPP; made findings; and adopted a Mitigation Monitoring and Reporting Program (MMRP);
- adopted the DTPP;
- amended the City’s General Plan to ensure consistency between the General Plan and the DTPP; and
- rezoned the DTPP area to Planned Community District under the City’s Zoning Ordinance.

The DTPP was since amended on September 10, 2012; July 22, 2013; and May 23, 2016.

III. Transit District DTPP Amendments and Environmental Review

The proposed Transit District DTPP Amendments would consist of amendments to the City’s General Plan and DTPP that would create a new sub-area, the Transit District area, within the DTPP area focused on transit-oriented development. In addition to creating the Transit District area boundaries, identifying a Transit District-specific development cap for office use, and adding residential development potential, the proposed Transit District DTPP Amendments envision a relocated and enlarged Caltrain station and tracks as part of a new and relocated Transit Center; make circulation improvements; and alter some land use controls (development standards) to support transit-oriented development

In the summer of 2021, pursuant to State CEQA Guidelines Section 15063, the City determined that the Project could result in potentially significant environmental impacts and that an EIR would be required. In compliance with Section 21092 of CEQA, the City circulated a Notice of Preparation (“NOP”) of a Draft Subsequent EIR (the “DSEIR”) for the Project to the Office of Planning and Research (OPR) State Clearinghouse and interested agencies and persons on August 27, 2021 for a 31-day review period. The NOP solicited comments regarding the scope of the DSEIR from identified responsible and trustee agencies, as well as interested parties.

The DSEIR was published by the City and available for review for a 47-day comment period from May 6, 2022 to June 21, 2022. During the comment period, the interested public and responsible and trustee agencies were invited to submit comments on the DSEIR to the City’s Community Development Department. Written and verbal comments on the DSEIR were also accepted at a Planning Commission hearing held on June 21, 2022. The DSEIR is available on the City’s website (www.redwoodcity.org/transitplan) and can be reviewed in hard copy at City Hall.

Following the completion of the public review period, the City reviewed all comments received on the DSEIR and prepared a Final Subsequent Environmental Impact Report (the “FSEIR”). The FSEIR, which incorporates by reference the DSEIR, includes all comments received during the public review period, responses to those comments, and also describes any changes to the DSEIR that resulted from the comments received. All persons who commented on the DSEIR have been notified of the availability of the FSEIR and the date of the public hearing on the Project before the City Council, and all responses to comments submitted on the DSEIR by public agencies have been provided to those agencies at least 10 days prior to the City Council hearing.

Section 21081.6 of CEQA requires lead agencies to adopt a mitigation monitoring or reporting program (“MMRP”) for any project for which it has made mitigation findings pursuant to Section 21081. The City has prepared an MMRP for the Project, which has been made available to the public with the FSEIR.

The SEIR is the subject of these Findings and presented for City Council certification consists of the DSEIR, the FSEIR, and the MMRP.

The City and responsible agency approvals necessary for implementation of the Project are:

Jurisdiction	Permits/Approval
City of Redwood City	Certification of the Final SEIR and adoption of the MMRP

	<p>Adoption of General Plan amendments, including revisions to the Downtown maximum allowable development cap for office use that is distinct from, and not subject to, the office cap applicable to the remainder of the DTPP, and the addition of residential development potential, to implement the proposed Transit District DTPP Amendments</p> <p>Adoption of amendments to the DTPP, including, but not necessarily limited to, the following:</p> <ul style="list-style-type: none"> - Amendment to establish the Transit District as a sub-area within the DTPP, with supplemental controls in addition to those applicable elsewhere in the DTPP; - Amendment of the maximum allowable development cap for office use to create a cap specific to the Transit District that is distinct from, and not subject to, the office cap applicable to the remainder of the DTPP, along with the addition of the residential development potential cleared by CEQA under this SEIR; - Minor amendments to minimum heights and to massing regulations (but no changes to the maximum allowable heights); - Revisions to the DTPP New Streets (Circulation) Regulations and associated revisions to DTPP maps, as well as to update the typology of some streets and eliminate some planned but unbuilt streets; - Revisions to DTPP Parking Regulations to lower the parking requirement to reflect anticipated reduced future parking demand, current best practices and future plans for Caltrain track expansion that will encourage non-driving modes of transportation while continuing to incentivize shared parking and the ability for project applicants to pay a fee to the City in lieu of providing new parking spaces (at the same time, bicycle parking requirements may be increased); - Revisions to the DTPP maps to accommodate potential future relocation of the Caltrain station to the north side of Broadway and expansion of the station to four tracks as part of Caltrain's 2040 Service Vision plan (the station relocation would be a separate project); - Revisions to the DTPP Public Frontages and Use Regulations; - Allowance for exceptions to mandatory Standards in the DTPP Development Regulations for sites identified as potentially providing privately owned publicly accessible open space that is identified on the Potential Public Open Space Map in DTPP Section 3.2.1, and for sites that are constrained by potential anticipated Caltrain track improvements and realignment. This would entail permitting limited exceptions to building placement requirements (i.e., build-to-corner, building setback, and frontage coverage requirements) to allow corner setbacks, other setbacks from the street, and lesser lot coverage than is currently required; and lowering the required minimum heights from 35 feet to 25 feet, or less with a potential exception). The exceptions would allow for reduced massing and shadows, an enhanced pedestrian experience, and provide support for ground floor retail; - Addition to the DTPP's list of permitted architectural styles to include Contemporary design; and - Amendments to various maps, figures, and charts in the DTPP to implement the foregoing.
Caltrans	Approvals in connection with proposed changes to El Camino Real (State Route 82)
Peninsula Joint Powers Board	Approvals in connection with the existing and new Transit Centers, Caltrain right-of-way, and parking
City/County Association of Governments	Determination of consistency with the County Airport Land Use Compatibility Plan (ALUCP) for San Carlos Airport
Regional Water Quality Control Board	Stormwater Pollution Prevention Control Plan/Construction General Permit Clean Water Act Section 401 Water Quality Certification

The SEIR was prepared to meet all applicable CEQA requirements necessary to support these actions by the City Council and the responsible agencies.

IV. Transit District DTPP Amendments and Environmental Review

A. Record of Proceedings and Custodian of Record

For purposes of CEQA and these Findings, the record of proceedings consists of the following documents and testimony, at a minimum:

- The SEIR, which consists of the *Redwood City Transit District DTPP Amendments Draft Subsequent Environmental Impact Report* (State Clearinghouse No. 2021080554), dated May 6, 2022 and published and circulated for public review and comment by the City from May 6, 2022, through June 21, 2022 (the DSEIR), and the *Redwood City Transit District DTPP Amendments Final Subsequent Environmental Impact Report*, published and made available for public review on October 14, 2022 (the FSEIR), and all appendices, reports, documents, studies, memoranda, maps, testimony, and other materials related thereto;
- All public notices issued by the City in connection with the Project and the preparation of the DSEIR and the FSEIR, including but not limited to public notices for all public workshops and scoping sessions held to seek public comments and input on the Project;
- All written and oral communications submitted by agencies or interested members of the general public during and immediately after the public review periods for the DSEIR and FSEIR, including oral communications made at public hearings or meetings held for the Project;
- All minutes, testimony, statements, comments and other materials memorializing, describing or relating to workshops, meetings, scoping sessions, and hearings conducted by the City Council, the Planning Commission, the City's Transportation Advisory Committee, the City's Architectural Advisory Committee, and all other departments of the City relating to the City's review and consideration of the Project;
- All other public reports, studies, documents, memoranda, maps, or other materials reviewed and/or considered by the City in connection with its review and consideration of the proposed Project, the DSEIR, the FSEIR, and the MMRP, whether prepared by the City, its consultants, or by third parties;
- All matters of common knowledge to the members of the City's Planning Commission and City Council, including but not limited to: (i) the City's 2010 General Plan, zoning ordinance, and other applicable policies and ordinances; (ii) information regarding the City's fiscal status and economic and development patterns and trends; (iii) federal, state and local laws, regulations, guidelines and publications applicable to or affecting the Project; and (iv) reports, projections, documents and other materials regarding statewide, regional, and local planning and development matters within and outside of the City; and
- All other documents and materials relating to the Project as described in Public Resources Code Section 21167.6, as applicable.

The record of proceedings is available for review by responsible agencies and interested members of the public during normal business hours at 1017 Middlefield Road, Redwood City, California. The custodian of these documents is the City of Redwood City Clerk's Office.

B. Findings Regarding Preparation and Consideration of the SEIR

The City Council finds, with respect to the City's preparation, review and consideration of the SEIR, that:

- The City exercised its independent judgment in accordance with Public Resources Code Section 21082.1(c) in retaining the independent consulting firm Environmental Science Associates (ESA) to prepare the SEIR, and ESA prepared the SEIR under the supervision and at the direction of the City's Community Development and Transportation Director and the SEIR reflects the City's independent judgment and analysis.
- The City circulated the DSEIR for review by responsible and trustee agencies and the public and submitted it to the State Clearinghouse for review and comment by state agencies, as required by CEQA and the CEQA Guidelines.
- The SEIR and the proposed Project were presented to the City's Planning Commission, which reviewed and considered, and conducted a public hearing thereon. The Planning Commission determined that the SEIR was adequate and sufficient, and prepared in compliance with CEQA and the CEQA Guidelines, and recommended to the City Council that the City Council certify the SEIR and approve the Project.
- The SEIR and the proposed Project were presented to the City Council of the City, with the recommendation of the City's Planning Commission. The City Council reviewed and considered, and conducted a public hearing on, the SEIR and proposed Project.
- The SEIR has been completed in compliance with CEQA and the CEQA Guidelines and reflects the City's independent judgment and analysis.

By these Findings, the City Council ratifies, adopts and incorporates the analyses, explanations, findings, responses to comments, and conclusions of the SEIR, except as otherwise specifically provided and described in these Findings.

V. Findings Regarding Environmental Impacts

A detailed analysis of the potential environmental impacts of the Project, and proposed mitigation measures to address all of the identified potentially significant impacts, is set forth in Chapters 4 through 17 of the DSEIR, as incorporated into the FSEIR. The City Council concurs with the conclusions in the DSEIR, as incorporated into the FSEIR, that changes or alterations have been required, or incorporated into, the Project which avoid or lessen all of the Project's potentially significant environmental effects to less-than-significant levels, except for Impact AQ-2 relating to increases in criteria air pollutants; Impact C-AQ-1, related to contribution to regional cumulative air quality impacts; Impact CC-1 related to generation of greenhouse gas emissions; Impact CC-2 related to conflicts with plans, policies or regulations adopted for the purpose of reducing greenhouse gas emissions; and Impact C-CC-1 regarding contribution to cumulative greenhouse gas emissions and conflicts with plans, policies or regulations adopted for the purpose of reducing greenhouse gas emissions, each of which would remain significant and unavoidable even after implementing all feasible mitigation measures. By these Findings, the City Council ratifies and adopts the SEIR's conclusions for all of the following potential environmental impacts, based on the analyses on the referenced pages of the DSEIR.

A. Findings Regarding Less than Significant Impacts

The following potential environmental impacts of the Transit District DTPP Amendments were determined to be less than significant and to not require any mitigation measures, as set forth in Chapters 4 through 17 of the DSEIR, as incorporated into the FSEIR. The City Council concurs with the conclusions in the DSEIR, as incorporated into the FSEIR, and makes the following findings with respect to such less than significant impacts.

4. Land Use and Planning

Impact LU-1: Implementation of the proposed Transit District DTPP Amendments would not physically divide an established community.

Implementation of the proposed Transit District DTPP Amendments would not include physical barriers or obstacles to circulation that would restrict existing patterns of movement between the Transit District area and the surrounding neighborhoods. In addition, the proposed Transit District DTPP Amendments would include features designed to encourage and promote public access, improve vehicular, bicycle and pedestrian circulation, where limited access exists today, and encourage alternative modes of transportation besides automobile. The proposed Transit District DTPP Amendments would increase connectivity in and around Downtown and would reinforce existing land use patterns by allowing for infill development in the DTPP. The proposed Transit District DTPP Amendments would not physically divide an established community, and impacts from the proposed Transit District DTPP Amendments would generally be beneficial, which would be the same as the DTPP Final EIR and would not result in new or more severe impacts than those identified in the Final EIR. Therefore, this impact would be less than significant. (Draft SEIR, pp. 4-11 to 4-12.)

Impact LU-2: Implementation of the proposed Transit District DTPP Amendments would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

The proposed Transit District DTPP Amendments would not conflict with *Plan Bay Area 2050* because the Amendments would allow for a new hub of office, residential and retail uses adjacent to the Redwood City Transit Center; the compact growth pursuant to the plan would occur within a PDA included in Plan Bay Area 2050; and the Transit District area is adjacent to a high-quality transit corridor, and in an area planned for future housing and job growth. The proposed Transit District DTPP Amendments would also not conflict with the *Comprehensive Airport Land Use Compatibility Plan (ALUCP) for the Environs of San Carlos Airport*. The City submitted the proposed action to the C/CAG of San Mateo County – the Airport Land Use Commission (ALUC) for San Mateo County - for a determination of consistency with the ALUCP prior to issuing a permit for the development. C/CAG ALUP recommended approval of the consistency determination, and has forwarded it to C/CAG Board of Directors to take final action. With approval of the proposed General Plan and DTPP amendments, the Transit District DTPP Amendments would achieve consistency with the *Redwood City General Plan* (including the DTPP) because it would further the objectives, policies, general land uses, and programs of the General Plan. Lastly, because the DTPP maps would be amended and land use controls and development standards within the Transit District Area would be adjusted, the Transit District DTPP Amendments would not conflict with the City's Zoning Code or other applicable development standards. Overall, the proposed Transit District DTPP Amendments and impacts related to conflicts with plans and policies would be the same as those identified in the DTPP Final

EIR and would not result in new or more severe impacts. This impact would be less than significant. (Draft SEIR, pp. 4-12 to 4-16.)

5. Population and Housing

Impact PH-1: Implementation of the proposed Transit District DTPP Amendments would not induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).

The proposed Transit District DTPP Amendments would cause the population of the DTPP to increase, however, this growth would be consistent with City and regional plans for growth and would not represent substantial unplanned growth. Any necessary infrastructure improvements would be sized to serve proposed development within the Transit District area, and not to make adjacent areas available for additional development. Some of the employees generated by the new office space proposed under the DTPP Amendments would be able to reside in the 1,100 new residential units that could be constructed; and the new housing demand that is not met on-site would be met in other parts of the city and the region, particularly given the Transit District area’s transit accessibility, which would allow new employees to access transit-served areas throughout the region. Overall, while the proposed Transit District DTPP Amendments would result in planned, direct population growth and may result in some indirect induced growth, the growth would be consistent with regional plans and for this reason population and housing impacts from the proposed Transit District DTPP Amendments would not result in new or more severe impacts than the impacts identified in the DTPP Final EIR. Therefore, impacts would be less than significant. (Draft SEIR, pp. 5-8 to 5-12.)

Impact PH-2: Implementation of the proposed Transit District DTPP Amendments would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

The Transit District area does not currently contain any dwelling units, and thus, the proposed Transit District DTPP Amendments would not cause direct displacement of a residential population. The proposed Transit District DTPP Amendments would directly displace substantial numbers of existing people or housing units, necessitating the construction of replacement housing elsewhere and would not result in new or more severe impacts than those identified in the DTPP Final EIR. Therefore, this impact would be **less than significant**. (Draft SEIR, pp. 5-12 to 5-14.)

6. Aesthetics and Shadows

Impact AE-1: Implementation of the proposed Transit District DTPP Amendments would not have a substantial adverse effect on a scenic vista.

Because the Transit District area and DTPP area are relatively flat, and since the overall maximum building heights in the Transit District area would not change, the proposed Transit District DTPP Amendments would not substantially obstruct or degrade scenic vistas. Views of the western hills would still be available from multiple publicly accessible vantage points within or adjacent to the Transit District area, and views of the Downtown Redwood City skyline and the San Francisco Bay from vantage points in the western hills would generally be improved. Therefore, impacts from the proposed Transit District DTPP Amendments on scenic vistas would be the same as conclusion reached in the DTPP Final EIR and would

not result in new or more severe impacts than were identified in the Final EIR. This impact would be less than significant. (Draft SEIR, p. 6-8.)

Impact AE-2: Implementation of the proposed Transit District DTPP Amendments would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.

The Transit District area contains no historic or architecturally distinctive structures, and because the area is separated from other parts of Downtown by the Caltrain tracks and El Camino Real, the introduction of Contemporary architecture would not adversely affect scenic resources. The Transit District area would not be visible from Interstate 280 due to the varied topography and intervening vegetation, and would not result in impacts to state scenic highways. This impact would be the same as the conclusion reached in the DTPP Final EIR and would not result in new or more severe impacts. Therefore, this impact would be less than significant. (Draft SEIR, p. 6-9.)

Impact AE-3: Implementation of the proposed Transit District DTPP Amendments would not conflict with applicable zoning and other regulations governing scenic quality.

The proposed Transit District DTPP Amendments would involve pedestrian-oriented improvements that would support *Redwood City General Plan* policies BE-12.1, BE-12.2, BE-18.2, and BE-18.6. In addition, the proposed Transit District DTPP Amendments would be consistent with goals related to “place-making” along major corridors and in centers through mixed-use development, supporting policies BE-12.5 and BE-12.6. The increased development intensity would integrate into the larger DTPP consistent with general plan goals related to integrating buildings into the surrounding environment. Finally, the proposed Transit District DTPP Amendments would allow for the development of housing in close proximity to transit, which would be consistent with Policy BE-11.3. Therefore, the proposed Transit District DTPP Amendments would not conflict with the General Plan as it relates to scenic quality. The proposed Transit District DTPP Amendments would include minor amendments to the allowable minimum height and massing regulations in the DTPP, but no changes to the maximum allowable height. Because the proposed Transit District DTPP Amendments would amend the DTPP figures for these changes related to building height and massing, the Transit District area would be brought into conformance with applicable design standards and the proposed Transit District DTPP Amendments would be consistent with the Zoning Code. The Redwood City Architectural Advisory Committee would review the proposed DTPP Amendments as part of their review and ensure changes pursued by the proposed Transit District DTPP Amendments are in keeping with the City’s desired scenic quality of the area. Thus, through amendments to the DTPP, the proposed Transit District DTPP Amendments would not conflict with regulations governing scenic quality, and would not result in new or more severe impacts than those identified in the DTPP Final EIR. Therefore, this impact would be less than significant. (Draft SEIR, pp. 6-9 to 6-12.)

Impact AE-4: Implementation of the proposed Transit District DTPP Amendments would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

New sources of light within the Transit District area under the proposed Transit District DTPP Amendments would be required to meet the LZ3 (medium) lighting power allowances in the California Building Standards Code Title 24 (Parts 1 and 6 – Outdoor Lighting Zones, which would improve the quality of outdoor lighting and reduce the impacts of light pollution, light trespass and glare to less than significant

levels. Therefore, the impact from the proposed Transit District DTPP Amendments on light and glare would be the same as the impact in the DTPP Final EIR and would not result in new or more severe impacts than identified in the DTPP Final EIR. This impact would be less than significant. (Draft SEIR, p. 6-12.)

Impact AE-5: Implementation of the proposed Transit District DTPP Amendments would not cast shadow that would substantially impair the beneficial use, important values, or livability of any shadow-sensitive use, including public parks, plazas or open space areas; buildings using passive solar heat collection or solar collectors; historic resources with a shadow-sensitive character-defining feature; or shadow-sensitive portions of residential parcels.

The proposed Transit District DTPP Amendments would not make any changes in allowable maximum building heights. The proposed Transit District DTPP Amendments would introduce some development flexibility by permitting limited exceptions which would allow for reduced building massing than is currently permissible, which would not increase shadow and could reduce shadow from new buildings, compared to shadow that could be permitted under the current DTPP regulations. Accordingly, the potential development allowed for with the proposed Transit District DTPP Amendments would not result in new or more severe shadow impacts than the impact identified in the DTPP Final EIR. Therefore, this impact would be less than significant. (Draft SEIR, pp. 6-12 to 6-13.)

7. Cultural and Historic Resources and Tribal Cultural Resources

Impact CR-3: Implementation of the proposed Transit District DTPP Amendments would not disturb any human remains, including those interred outside of formal cemeteries.

No human remains are known to exist in the Transit District area, and therefore, the proposed Transit District DTPP Amendments are not anticipated to impact human remains, including those interred outside of formal cemeteries. If any previously unknown human remains were encountered during ground disturbing activities impacts would be reduced to a less than significant level with implementation of PRC Section 5097.98 and Health and Safety Code Section 7050.5, which requires the County Coroner will be contacted, and if the remains are Native American, the coroner will contact the NAHC and the most likely descendent will make recommendations for means of treating the human remains and any associated grave goods. The DTPP Final EIR did not specifically address impacts associated with human remains, including those interred outside of formal cemeteries. The proposed Transit District DTPP Amendments would not result in new or more severe impacts than identified in the Final EIR because the requirements of PRC Section 5097.98 and Health and Safety Code Section 7050.5 are sufficient to reduce this impact to a less-than-significant level. (Draft SEIR, p. 7-22.)

8. Public Services and Recreation

Impact PS-1: Implementation of the Transit District would not 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 police protection.

Development within the Transit District area would increase overall demand on police services in the City and within the Downtown area, and new police facilities and equipment may be needed in the future, but cannot be specified by Redwood City Police Department (RCPD) at this time. Should RCPD determine that an additional police substation or community policing center is necessary within the DTPP area, the

facility would likely be incorporated into an existing or otherwise-planned structure similar to the existing Downtown Substation, and would generate no new or more severe impacts on police services beyond those identified in the DTPP Final EIR. Therefore, the impact on police protection services would be less than significant. (Draft SEIR, pp. 8-11 to 8-12.)

Impact PS-2: Implementation of the Transit District would not 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 fire protection and emergency medical response service.

Development within the Transit District would result in an increase in population and thus an incremental increase in demand for fire protection and emergency medical response services from the Redwood City Fire Department (RCFD). If and when the construction or expansion of fire protection facilities to accommodate additional personnel or equipment becomes necessary, environmental review under CEQA, General Plan provisions, and City and Zoning Code regulations would all apply, and thereby avoid significant environmental impacts. The proposed Transit District DTPP Amendments would generate no new or more severe impacts related to fire protection or emergency medical services beyond those identified in the DTPP Final EIR. Therefore, the impact on fire protection and emergency medical response services would be less than significant. (Draft SEIR, pp. 8-12 to 8-13.)

Impact PS-3: Implementation of the Transit District would not 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.

The proposed Transit District DTPP Amendments would increase the use of existing City parks and recreational facilities. However, individual projects developed within the proposed Transit District would be subject to the City's Parks Impact Fee and parkland dedication requirements (or Parkland In-Lieu Fee), which would fund improvements to existing facilities as a result of increased demand. The increased demand on existing regional parks would also not substantially increase or accelerate the physical deterioration or degradation of existing parks and recreation facilities, as these areas are much larger in size and have planned for regional recreational use. In addition, open space developed as a result of requirements for individual projects within the proposed Transit District would also absorb a small portion of the demand for parks and recreational facilities by new residents. Therefore, there would be no new or more severe impacts from the accelerated physical deterioration of parks and recreation resources associated with the Transit District than the impact identified in the DTPP Final EIR. This impact would be less than significant. (Draft SEIR, pp. 8-13 to 8-15.)

Impact PS-4: Implementation of the Transit District would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Development within the Transit District would generate a demand for up to approximately 7.53 acres of additional parkland. The park projects that would be developed as a result of the City's Parks Impact Fee and Parkland In-Lieu Fee would be required to undergo environmental review as they are identified. Appropriate measures would be identified and implemented as applicable to reduce any construction-related or operational effects of those facilities. Therefore, there would be no new or more severe impacts on

recreational facilities than the impact identified in the DTPP Final EIR. This impact would be less than significant. (Draft SEIR, pp. 8-15 to 8-16.)

Impact PS-5: Implementation of the Transit District would not 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 or other performance objectives for schools.

The addition of elementary and middle school-aged students to the Redwood City School District (RCSD) due to development within the proposed Transit District would likely require facility updates to increase capacity for RCSD, and particularly at Clifford School to accommodate the growth in elementary and middle school-aged students. The addition of high school-aged students to Sequoia Union High School District (SUHSD) due to development within the proposed Transit District would likely require facility updates to increase capacity for SUHSD, and particularly at Sequoia High School to accommodate the growth in high school-aged students. Projects developed within the proposed Transit District would be required to comply with California Government Code Section 65996, which would mitigate the potential effect on public school facilities from the new student population that would be generated by the Transit District. In addition, any expansion of school facilities would be required to undergo environmental review as they are identified. Appropriate measures would be identified and implemented as applicable to reduce any construction-related or operational effects of those facilities. There would be no new or more severe impacts on school services associated with the Transit District than the impact identified in the DTPP Final EIR. Therefore, this impact would be less than significant. (Draft SEIR, pp. 8-16 to 8-17.)

Impact PS-6: Implementation of the Transit District would not 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 or other performance objectives for libraries.

Any Downtown Library facility expansion or improvements developed as a result of the proposed Transit District would be required to undergo environmental review as they are identified. Appropriate measures would be identified and implemented as applicable to reduce any construction-related or operational effects of those facilities and the proposed Transit District DTPP Amendments would not result in new or more severe impacts than were identified in the DTPP Final EIR. Therefore, impacts related to libraries associated with the Transit District would be less than significant. (Draft SEIR, pp. 8-17 to 8-18.)

9. Transportation and Circulation

Impact TR-1: Implementation of the proposed Transit District DTPP Amendments would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.

The proposed Transit District DTPP Amendments would be consistent with and promote General Plan, DTPP policies, and RWCmoves goals for the Downtown area, and thus, implementation of the proposed Transit District DTPP Amendments would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. The proposed Transit District DTPP Amendments would not result in new or more severe circulation-related impacts than the

impacts identified in the DTPP Final EIR. Therefore, the impact would be less than significant and no mitigation measures would be required. (Draft SEIR, pp. 9-18 to 9-22.)

Impact TR-2: Implementation of the proposed Transit District DTPP Amendments would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).

Under 2040 cumulative conditions with the proposed Transit District DTPP Amendments, the citywide boundary VMT per capita is estimated to be 10.01 miles, which would be less than the citywide VMT per capita of 10.38 miles without the proposed Transit District DTPP Amendments. Therefore, the impact of the proposed Transit District DTPP Amendments on VMT would be less than significant. Furthermore, the effect of roadway network changes proposed by the Transit District DTPP Amendments was found to not have a substantial effect on VMT. Therefore, implementation of the proposed Transit District DTPP Amendments would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). The proposed Transit District DTPP Amendments would not result in new significant VMT impacts. The impact would be less than significant and no mitigation measures would be required. (Draft SEIR, pp. 9-22 to 9-28.)

Impact TR-3: Implementation of the proposed Transit District DTPP Amendments would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

As detailed street designs associated with the proposed Transit District DTPP Amendments are developed, any roadway extensions and new streets would need to comply with the DTPP, RWCmoves and the Street Design Criteria included in the City's Engineering Standards, all of which include design specifications to ensure safe and efficient travel of vehicles, bicycles, pedestrians, and transit vehicles. Therefore, the proposed Transit District DTPP Amendments would not introduce any geometric design features or incompatible uses, and would not result in a new or more severe impact related to traffic hazards than the impact identified in the DTPP Final EIR. This impact would be less than significant. (Draft SEIR, pp 9-27 to 9-28.)

Impact TR-4: Implementation of the proposed Transit District DTPP Amendments would not result in inadequate emergency access.

Any roadway extensions would need to comply with the Street Design Criteria included in the City's Engineering Standards, as well as relevant sections from RWCmoves, which include design specifications that consider emergency vehicle access requirements. All new street segments would be designed in accordance with City policies and provide adequate emergency vehicle access and would not impede emergency vehicle access to the Transit District area and surrounding area by emergency vehicles. The Fire Department and other relevant City departments would review the final design and on-site circulation, once completed, to ensure that there is adequate emergency access. Overall, the proposed roadway extensions and new streets provide for a grid network that has adequate emergency vehicle access throughout the Transit District area. The streets proposed to be removed/closed are generally short (fewer than 400 feet) and would still allow for emergency vehicle access to individual buildings. The proposed Transit District DTPP Amendments would not result in new or more severe impacts related to emergency access than the impact identified in the DTPP Final EIR. Therefore, the impact would be less than significant. (Draft SEIR, pp. 9-28 to 9-29.)

10. Utilities and Infrastructure, Hydrology and Water Quality

Impact UT-3: Implementation of the proposed Transit District DTPP Amendments would not result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

Development within the Transit District area would result in an increase in population and thus an increased demand for wastewater treatment. The Transit District area would generate approximately 0.34 MGD, representing approximately 2 percent of the 15 to 17 MGD excess average daily capacity of the Silicon Valley Clean Water (SVCW) treatment plant. Therefore, the proposed Transit District DTPP Amendments' estimated wastewater generation would be adequately served by the SVCW wastewater treatment plant. Additionally, development within the Transit District area would be required to comply with the CALGreen Code, which requires that new construction use high-efficiency plumbing fixtures, which would minimize the wastewater generated by the proposed Transit District DTPP Amendments. Consequently, the proposed Transit District DTPP Amendments would not result in wastewater treatment capacity issues and would not result in new or more severe impacts than impacts identified in the DTPP Final EIR. Therefore, this impact would be less than significant. (Draft SEIR, pp. 10-33 to 10-34.)

Impact UT-4: Implementation of the proposed Transit District DTPP Amendments would not 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.

Project construction is not expected to generate substantial amounts of solid waste during construction relative to the remaining capacity of the Ox Mountain Landfill. Projects developed within the Transit District area would be required to comply with existing solid waste reduction requirements, including applicable federal, State and local solid waste statutes and regulations during construction. Therefore, construction associated with the proposed Transit District DTPP Amendments would not generate solid waste in excess of local infrastructure and would not impair the attainment of state-level or local waste reduction goals. During operation, the daily solid waste estimates associated with the proposed Transit District DTPP Amendments would account for less than 0.9 percent of the permitted daily capacity of the Ox Mountain Landfill, and as such the proposed Transit District DTPP Amendments would not generate substantial amounts of solid waste during operation relative to the capacity of local infrastructure. Projects developed within the Transit District area would be required to comply with existing solid waste reduction requirements, including applicable federal, State and local solid waste statutes and regulations during operation, including the CALGreen building and State recycling and organic material diversion requirements. Therefore, operation of development within the Transit District area would not generate solid waste in excess of the local infrastructure, and would not impair the attainment of state-level or local waste reduction goals. The proposed Transit District DTPP Amendments would not result in new or more severe impacts than the impacts identified in the DTPP Final EIR. Therefore, this impact would be **less than significant**. (Draft SEIR, pp. 10-34 to 10-35.)

Impact UT-5: Implementation of the proposed Transit District DTPP Amendments would comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

During construction and operation associated with development within the Transit District area, development projects would be required to comply with federal, state, and local solid waste standards, such as the California Integrated Waste Management Act, AB 939, the CALGreen Code, AB 341 and AB 1826,

SB 1383, and the City of Redwood City C&D Ordinance. As a result of these requirements and oversight, development within the Transit District area would not conflict with applicable waste reduction policies. Therefore, the proposed Transit District DTPP Amendments would not result in new or more severe impacts regarding compliance with solid waste regulations than the impacts identified in the DTPP Final EIR. This impact would be **less than significant**. (Draft SEIR, p.10-36.)

Impact UT-6: Implementation of the proposed Transit District DTPP Amendments would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.

The proposed Transit District DTPP Amendments would allow for development on previously developed land, and the change in impervious surfaces would be negligible. Further, the added landscaping and conversion of a segment of Hamilton Street from a required street to a potential privately owned, publicly accessible open space would provide additional pervious surfaces. Compliance with SWPPP regulations would be sufficient to address impacts from the proposed Transit District DTPP Amendments as they relate to water quality issues as a result of polluted runoff from future ground disturbance. The proposed Transit District DTPP Amendments would not result in new or more severe impacts than the impacts identified in the DTPP Final EIR. Therefore, the impact would be less than significant. (Draft SEIR, pp. 10-36 to 10-37.)

Impact UT-7: Implementation of the proposed Transit District DTPP Amendments would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.

The proposed Transit District DTPP Amendments do not propose the use of groundwater supply, and would redevelop an already urbanized area so that the amount of impervious surfaces would remain essentially the same. For these reasons, the impacts on groundwater resulting from the proposed Transit District DTPP Amendments would be similar to those identified in the DTPP Final EIR and would not result in new or more severe impacts. The impact would be less than significant. (Draft SEIR, p. 10-37.)

Impact UT-8: Implementation of the proposed Transit District DTPP Amendments would not 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 off-site; (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; (iv) impede or redirect flood flows.

Future development under the proposed the Transit District DTPP Amendments would replace existing developed area, and proposed infrastructure improvements would be within existing rights of way and subject to City review, ensuring no substantial changes to drainage patterns. As a result, the impacts from the proposed Transit District DTPP Amendments would be similar to those identified in the DTPP Final EIR and would not result in new or more severe impacts. The impact would be less than significant. (Draft SEIR, p. 10-38.)

Impact UT-9: Implementation of the proposed Transit District DTPP Amendments would not result in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.

The Transit District area is not within a tsunami zone or in an area at risk of inundation from a seiche. Therefore, tsunami and seiche related impacts would be less than significant. Further, the Transit District area is not within the 100-year flood zone, so flood-related risks would also be less than significant. (Draft SEIR, pp. 10-38.)

Impact UT-10: Implementation of the proposed Transit District DTPP Amendments would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

The proposed Transit District DTPP Amendments would not use groundwater supply, and future developments would not increase the amount of impervious surfaces. For these reasons, and because the proposed Transit District DTPP Amendments would be subject to applicable City, County, and RWQCB requirements (including preparation of a SWPPP), the potential impacts from the proposed Transit District DTPP Amendments to water quality control plans and sustainable groundwater management plans would not result in new or more severe impacts than what was identified in the DTPP Final EIR. Therefore, this impact would be less than significant. (Draft SEIR, pp. 10-39.)

11. Noise and Vibration

Impact NO-4: Implementation of the proposed Transit District DTPP Amendments would not expose people residing or working in the project area to excessive noise levels due to its location 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.

The Transit District area is located within the Airport Influence Area (Area A) of the *Comprehensive Airport Land Use Compatibility Plan (ALUCP) for the Environs of San Carlos Airport*. Because noise from aircraft operations at the San Carlos Airport do not exceed 60 CNEL (a level “normally acceptable”) anywhere in the Transit District area and because the ALUCP requires a Real Estate Disclosure as part of Policy 1 of the Airport Influence Area, the proposed Transit District DTPP Amendments would not result in new or more severe impacts with respect to airport noise than what was identified in the DTPP Final EIR. Therefore, impacts with respect to exposure of people residing or working in the project area to excessive noise levels due to its location within the vicinity of a private airstrip, or an airport land use plan would be less than significant. (Draft SEIR, pp. 11-25 to 11-26.)

12. Air Quality

Impact AQ-1: Adoption of the proposed Transit District DTPP Amendments would not conflict with or obstruct implementation of the applicable air quality plan.

Subsequent projects proposed as part of the Transit District DTPP Amendments would include features, either by design, required as part of compliance with regulations or their location close to transit facilities, that support implementation of transportation-, energy-, building-, waste-, and water conservation-related measures included in the 2017 Clean Air Plan. Required compliance with regulations from various agencies as well as the City, and implementation of new Mitigation Measures AQ-2a and AQ-2b required to mitigate Impact AQ-2, would ensure that implementation of the proposed Transit District DTPP Amendments would be consistent and support all applicable control measures from the 2017 Clean Air Plan.

Further, the proposed Transit District DTPP Amendments would not cause the disruption or delay in the implementation of Clean Air Plan control measures. The proposed Transit District DTPP Amendments would also include pedestrian, bicycle, and transit enhancements to improve safety and connectivity to and from the relocated Redwood City Transit Center, consistent with the goals of the Association of Bay Area Governments' Sustainable Communities Strategy: Plan Bay Area 2050. In addition, many of the proposed Transit District DTPP Amendments would reduce single-occupancy vehicle trips and be complimentary to the City's TDM Ordinance goals. Therefore, the proposed Transit District DTPP Amendments would not hinder or delay implementation of any control measures contained in the 2017 Clean Air Plan. Development proposed as part of the Transit District DTPP Amendments would therefore be consistent with the BAAQMD's 2017 Clean Air Plan and would not result in new or more severe impacts than what was identified in the DTPP Final EIR. Therefore, this impact would be less than significant. (Draft SEIR, pp. 12-24 to 12-30.)

Impact AQ-4: Adoption of the proposed Transit District DTPP Amendments would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Land uses proposed as part of the Transit District DTPP Amendments would not include any major sources of odor that would adversely affect a substantial number of people and would not result in new or more severe impacts than the impacts identified in the DTPP Final EIR. The impact would be less than significant and no mitigation measures would be required. (Draft SEIR, pp. 12-41 to 12-42.)

13. Climate Change

Impact CC-3: Implementation of the proposed Transit District DTPP Amendments would not result in wasteful, inefficient, or unnecessary consumption of energy resources during project construction and operation or conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

Overall, construction activities that would be required as part of implementation of the proposed Transit District DTPP Amendments would not be unusual as compared to overall local and regional demand for energy resources and would not involve characteristics that require equipment that would be less energy-efficient than at comparable construction sites in the region or state. Therefore, the proposed Transit District DTPP Amendments would not result in the inefficient, wasteful, or unnecessary consumption of energy during construction. In terms of building operational efficiency, proposed development in the Transit District area would be required to be all-electric with no natural gas infrastructure, which eliminates natural gas usage onsite. Applicants of subsequent project would also be required to ensure that proposed development would meet Title 24 requirements applicable at that time, as required by state regulations through their plan review process. Given that the location of the Transit District area is proximate to transit facilities reduces VMT within the region, acting to also reduce regional vehicle energy demand, the Transit District DTPP Amendments' transportation energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary and the proposed Transit District DTPP Amendments would be consistent with regulations to reduce transportation energy use. Considering these factors and requirements, energy use associated with the construction and operation of development proposed within the Transit District area would not be considered unnecessary and wasteful and would be consistent with all applicable plans, policies and regulations developed to encourage energy conservation and renewable energy use. Therefore, the proposed Transit District DTPP Amendments would not result in new or more severe impacts than what was previously

identified in the DTPP Final EIR. this impact would be less than significant. (Draft SEIR, pp. 13-41 to 13-45.)

Impact CC-4: Implementation of the proposed Transit District DTPP Amendments would not exacerbate effects of sea level rise.

All future development under the proposed Transit District DTPP Amendments would be consistent with the City's GHG reduction goals and meet the BAAQMD's adopted thresholds for GHG emissions, which require project design elements to include no natural gas in residential and non-residential buildings, and provide EV charging infrastructure in compliance with CALGreen Tier 2 requirements. With implementation of Mitigation Measure CC-1, the proposed Transit District DTPP Amendments would meet these thresholds, resulting in an increase in GHG emissions that is not cumulatively considerable, and thus would not exacerbate sea level rise. For these reasons, the proposed Transit District DTPP Amendments would not exacerbate effects of sea level rise and would not result in new or more severe impacts than what was identified in the DTPP Final EIR. Therefore, this impact would be less than significant, and no mitigation is required. (Draft SEIR, pp. 13-45 to 13-46.)

14. Hazards and Hazardous Materials

Impact HAZ-1: Implementation of the proposed Transit District DTPP Amendments would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

All activities associated with handling hazardous materials during future development would be subject to the federal, state, and local laws in place to ensure the safe handling (transport, use, and disposal) of hazardous materials. Compliance with all applicable federal, state, and local laws would ensure that impacts from the proposed Transit District DTPP Amendments would not result in new or more severe impacts than the impacts identified in the DTPP Final EIR. Therefore, impacts related to the transport, use, and disposal of hazardous materials would be less than significant. (Draft SEIR, p. 14-6.)

Impact HAZ-2: Implementation of the proposed Transit District DTPP Amendments would not 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.

All activities associated with handling hazardous materials during future development would be subject to the federal, state, and local laws in place to ensure the proper handling of hazardous materials, in the event of an accidental release. Compliance with all applicable federal, state, and local laws would ensure that impacts from the proposed Transit District DTPP Amendments would not result in new or more severe impacts than the impacts identified in the DTPP Final EIR. Therefore, impacts related to the accidental release of hazardous materials would be less than significant. (Draft SEIR, pp. 14-6 to 14-7.)

Impact HAZ-3: Implementation of the proposed Transit District DTPP Amendments would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

Future development within the Transit District area would require construction and possibly demolition activities, which would require the emission, transport, use, and disposal of hazardous materials within one-quarter mile of a school. All activities associated with handling hazardous materials during future

development would be subject to the federal, state, and local laws in place to ensure the proper handling of hazardous materials, in the event of an accidental release. Compliance with all applicable federal, state, and local laws would ensure that impacts from the proposed Transit District DTPP Amendments would not result in new or more severe impacts than the impacts identified in the DTPP Final EIR. Therefore, impacts related to the accidental release of hazardous materials would be less than significant. (Draft SEIR, p. 14-7.)

Impact HAZ-4: Implementation of the proposed Transit District DTPP Amendments would be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, would not create a significant hazard to the public or the environment.

Future development within the Transit District area would require construction and possibly demolition activities, which could expose previously contaminated soil or groundwater. Each new future developer would be subject to the same previously discussed state and local laws and any potential impacts from the proposed Transit District DTPP Amendments would not result in new or more severe impacts than the impacts identified in the DTPP Final EIR. Therefore, impacts related to the exposing people and/or the environment to prior contamination associated with existing hazardous materials sites would be less than significant. (Draft SEIR, pp. 14-7 to 14-8.)

Impact HAZ-5: Implementation of the proposed Transit District DTPP Amendments would not result in a safety hazard or excessive noise for people residing or working in the project area.

The proposed Transit District DTPP Amendments would allow for future development which would not surpass the existing building height restrictions. The proposed Transit District is a sub-area within the DTPP area and is approximately 1.7 miles southeast of the San Carlos Airport of an airport but is not within and noise or safety zones established in the San Mateo County ALUCP. Future development within the Transit District area would be designed consistent with the land use restrictions established in the San Mateo County ALUCP. Therefore, impacts from the proposed Transit District DTPP Amendments would not result in new or more severe impacts than the impacts identified in the DTPP Final EIR. Therefore, impacts related to safety and noise hazards associated with airports would be less than significant. (Draft SEIR, p. 14-8.)

Impact HAZ-6: Implementation of the proposed Transit District DTPP Amendments would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

Since certification of the DTPP Final EIR, the City has implemented signal prioritization at 15 intersections in the Downtown, including around Fire Station No. 9 on Marshall Street. This signal prioritization for emergency vehicles combined with the ability of first responders to use vehicle lights and sirens would mean that the increased volumes would not substantially impair emergency response. In addition, the urban character of the surrounding area, with a grid of local streets providing multiple access and egress routes in event of an emergency, would mean that the increased volumes would not substantially impair emergency evacuation. Impacts of the proposed Transit District DTPP Amendments would not result in new or more severe impacts than the impacts identified in the DTPP Final EIR because the DTPP Final EIR Mitigation Measure 8-1 has already been implemented, and the project does not add any new signals. Therefore, impacts would be less than significant. (Draft SEIR, pp. 14-8 to 14-9.)

Impact HAZ-7: Implementation of the proposed Transit District DTPP Amendments would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

Future developments within the Transit District area would include construction activities, which would require the use some flammable substances which can be inadvertently ignited. New development may also use flammable substances. However, state and local laws are in effect that are intended to reduce the ignition and spread of wildfire. The Transit District area is within an urbanized area of the city and not within an established Very High Fire Hazard Severity Zone (VHFHSZ), or immediately adjacent to a VHFHSZ where wildfire is considered a hazard. For these reasons, the proposed Transit District DTPP Amendments would not result in new impacts and would be less than significant. (Draft SEIR, p. 14-9.)

15. Biological Resources

Impact BIO-2: Implementation of the proposed Transit District DTPP Amendments would not 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.

The proposed Transit District DTPP Amendments would not result in new or more severe impacts than the impact identified in the DTPP Final EIR, because the Transit District area does not include any areas of riparian habitat or sensitive natural communities. Therefore, implementation of the proposed Transit District DTPP Amendments would have no impact on these resources; thus, no mitigation is required. (Draft SEIR, pp. 15-7.)

Impact BIO-3: Implementation of the proposed Transit District DTPP Amendments would not have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

The proposed Transit District DTPP Amendments would not result in new or more severe impacts than the impact identified in the DTPP Final EIR because the Transit District area does not include any wetlands or open waters. Therefore, implementation of the proposed Transit District DTPP Amendments would have no impact on these resources; thus, no mitigation is required. (Draft SEIR, pp. 15-7 to 15-8.)

Impact BIO-6: Implementation of the proposed Transit District DTPP Amendments would not 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 adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan applies to the Transit District area. Consequently, there would be no impact from implementation of the proposed Transit District DTPP Amendments. (Draft SEIR, p. 15-10.)

16. Geology and Soils

Impact GEO-1: Implementation of the proposed Transit District DTPP Amendments would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault; strong seismic ground shaking; seismic-related ground failure, including liquefaction; or landslides.

All future development would be subject to the state and local laws in place to ensure that new developments are constructed in accordance with the CBC and are structurally sound. Specifically, all future developments would be required to undergo a geotechnical investigation and submit a geotechnical report prior to construction, which would inform the geotechnical design of all structures to ensure they are able to withstand any impacts from seismic hazards, such as strong ground shaking and liquefaction. Compliance with all applicable state and local laws would ensure that impacts from the proposed Transit District DTPP Amendments would not result in new or more severe impacts related to seismic hazards than the impacts identified in the DTPP Final EIR. Therefore, impacts related to seismic hazards would be less than significant. (Draft SEIR, p. 16-9.)

Impact GEO-3: Implementation of the proposed Transit District DTPP Amendments would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.

Risks associated with unstable geologic units or soil are low, however, effects of strong seismic ground shaking and liquefaction would present a potentially significant impact. Compliance with all applicable local and state laws (i.e., the California Building Code [CBC]) would ensure that all future developments within the proposed Transit District would be designed consistent with the CBC, which would ensure that new structures would not be susceptible to the effects of unstable geologic units and soils. The impacts of the proposed Transit District DTPP Amendments would not result in new or more severe impacts related to unstable geologic units than those identified in the DTPP Final EIR. Therefore, the impact would be less than significant. (Draft SEIR, p. 16-11.)

Impact GEO-5: Implementation of the proposed Transit District DTPP Amendments would not have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water.

No septic systems would be installed in the Transit District area. As future developments would connect to the existing sewer system, there would be a less-than-significant impact related to the suitability of the soils. (Draft SEIR, p. 16-12.)

17. Cumulative Impacts

Impact C-LU-1: The proposed Transit District DTPP Amendments, in combination with past, present, existing, approved, pending, and reasonably foreseeable future projects would not result in cumulative impacts on land use and planning.

The proposed Transit District DTPP Amendments, in conjunction with other cumulative development within the vicinity, would not divide an established community and the proposed Transit District DTPP Amendments would not result in any increase in the physical barrier that results from the existing Caltrain tracks, while cumulative development, particularly if it were to include grade separation of the Caltrain tracks, would decrease the existing physical barrier in Downtown Redwood City. In addition,

the proposed Transit District DTPP Amendments, together with related cumulative projects, would include high-density residential, commercial, and transit-oriented development concentrated in a Transit Priority Area that would implement the transit-oriented development policies and would not conflict with plans adopted for the purpose of avoiding or mitigating an environmental effect. There would be no new or more severe cumulative impact than the impact identified in the DTPP Final EIR. The cumulative impact would be less than significant. (Draft SEIR, pp. 17-5 to 17-7.)

Impact C-PH-1: Implementation of the proposed Transit District DTPP Amendments, in combination with past, present, existing, approved, pending, and reasonably foreseeable future projects, would have a less than significant cumulative impact on population and housing.

The proposed Transit District DTPP Amendments would not induce population growth beyond that already planned, and would not directly displace housing or necessitate the construction of replacement housing outside of the proposed Transit District because the Transit District area does not currently contain any dwelling units or office space; thus, no direct displacement would occur. Therefore, the proposed Transit District DTPP Amendments would not result in new or more severe cumulative impacts related to growth inducement or displacement of housing and people than the impacts identified in the DTPP Final EIR. The cumulative impact would be less than significant. (Draft SEIR, pp. 17-8 to 17-9.)

Impact C-AE-1: Implementation of the proposed Transit District DTPP Amendments, in combination with past, present, existing, approved, pending, and reasonably foreseeable future projects, would not result in a significant impact related to aesthetics, light, glare, or shadow.

Development of cumulative transportation projects (e.g., Peninsula Corridor Electrification Project, relocation and expansion of the Caltrain station, and potential future Caltrain grade separation) would not change maximum allowable building heights or introduce tall or bulky features that would obstruct scenic vistas from public vantage points, conflict with regulations governing scenic quality, or combine with the proposed Transit District DTPP Amendments to result in light and glare, or shadow impacts. In addition, the proposed Transit District DTPP Amendments would contribute to a “mounding” of buildings concentrated near the center of Downtown which would be seen as beneficial, and therefore would not result in significant cumulative impacts on aesthetics. With respect to light and glare, compliance with Title 24 standards would improve the quality of outdoor lighting and reduce the cumulative impacts of light pollution, light trespass and glare to less than significant levels. The proposed Transit District DTPP Amendments development projects would also not increase the potential for shadow beyond that analyzed in the DTPP Final EIR, and therefore the proposed amendments would not contribute to any potential increased shadow from cumulative development. As a result, the cumulative impact of the proposed Transit District DTPP Amendments in combination with cumulative projects would not result in new or more severe cumulative impacts than the impacts identified in the DTPP Final EIR. The cumulative impact would be less than significant. (Draft SEIR, pp. 17-9 to 17-10.)

Impact C-CR-1: The proposed Transit District DTPP Amendments, in combination with past, present, existing, approved, pending, and reasonably foreseeable future projects would result in less-than-significant cumulative impacts related to cultural, historic, and tribal cultural resources.

The Transit District area does not contain historic resources or historic districts, and there are no adjacent historic districts, and therefore, the proposed Transit District DTPP Amendments would not result in additional impacts to historic architectural resources. When considered together with other projects within

and adjacent to the Transit District area, the less-than-significant impacts to cultural and historical resources do not considerably contribute to the significant cumulative impact identified in the 2010 DTPP Final EIR and would not result in new or more severe cumulative impacts. Therefore, the proposed Transit District DTPP Amendments' contribution to the cumulative impact related to cultural and historic resources and tribal cultural resources would be less than significant. (Draft SEIR, pp. 17-10 to 17-11.)

Impact C-PS-1: Implementation of the proposed Transit District DTPP Amendments, combined with past, present, existing, approved, pending, and reasonably foreseeable future projects in the vicinity and Citywide, would not result in an adverse cumulative increase in demand for public services that would require new or physically altered governmental facilities, construction of which could have significant physical environmental impacts.

The proposed Transit District DTPP Amendments, in combination with cumulative projects in the vicinity would increase the demand for police services, fire protection and emergency medical response services, public schools, and libraries. With respect to cumulative demand for police protection, should the Redwood City Police Department (RCPD) determine that an additional police substation or community policing center is necessary within the DTPP area as a result of cumulative development, the facility would likely be incorporated into an existing or otherwise-planned structure similar to the existing Downtown Substation and would not result in significant environmental impacts. With respect to cumulative demand for fire protection, if and when the construction or expansion of Redwood City Fire Department (RCFD) facilities to accommodate additional fire personnel or equipment becomes necessary as a result of cumulative development, CEQA review, General Plan provisions, and City and Zoning Code regulations would all apply, thereby avoiding significant environmental impacts. Similar to individual projects developed within the Transit District area, cumulative projects would be subject to school impact fees which would fully mitigate the potential effect on public school facilities from the new student population that may be generated by cumulative development; and any expansion of new school facilities would be required to undergo environmental review as they are identified. With respect to cumulative demand for public libraries, any Downtown Library facility expansion or improvements developed as a result of the Redwood City Public Library (RCPL)'s study and cumulative development would be required to undergo environmental review as they are identified, and appropriate measures would be identified and implemented as applicable to reduce any construction-related or operational effects of those facilities. Therefore, when considered in the cumulative context, the proposed Transit District DTPP Amendments' public services-related impacts would not be cumulatively considerable and would not result in new or more severe cumulative impacts than what was identified in the DTPP Final EIR. Cumulative impacts would be less than significant. (Draft SEIR, pp. 17-12 to 17-13.)

Impact C-PS-2: Implementation of the proposed Transit District DTPP Amendments, combined with past, present, existing, approved, pending, and reasonably foreseeable future projects in the vicinity and citywide, would not result in significant cumulative impacts to parks and recreation.

Cumulative projects, including individual projects proposed under the DTPP Plan-wide Amendments, would be subject to the City's Parks Impact Fee and parkland dedication requirements (or Parkland In-Lieu Fee) as they are developed, the same as for the proposed Transit District DTPP Amendments. The park projects developed as a result of the City's Parks Impact Fee and Parkland In-Lieu Fee would be required to undergo environmental review as they are identified. Therefore, when considered in the cumulative context, the Transit District DTPP Amendments' parks and recreation-related impacts would not be cumulatively considerable and would not result in new or more severe cumulative impacts than

the impacts identified in the DTPP Final EIR. Cumulative impacts related to parks and recreation would be less than significant. (Draft SEIR, pp. 17-13 to 17-14.)

Impact C-TR-1: Implementation of the proposed Transit District DTPP Amendments, in combination with past, present, existing, approved, pending, and reasonably foreseeable future projects in the vicinity and Citywide, would not result in a cumulatively considerable contribution to a significant transportation impact.

The proposed Transit District DTPP Amendments would generate per capita and per employee VMT under cumulative (Year 2040) conditions that are below the City's thresholds of significance. The proposed Transit District DTPP Amendments is consistent with the General Plan policies related to transportation facilities. The Transit District area is located in a central area of Downtown Redwood City near high-quality transit, which is beneficial with regard to VMT, reduced vehicle trips, and increased usage of non-auto transportation (walking, biking, and transit). The same City design standards and requirements that must be met for individual project approvals identified for increased hazards and emergency access would also apply to any and all other cumulative project that could be approved/built under the proposed Transit District DTPP Amendments. As a result, the proposed Transit District DTPP Amendments would not result in a cumulatively considerable contribution to a significant transportation impact and would not result in new or more severe cumulative impacts than the impacts identified in the DTPP Final EIR. Therefore, the impact would be less than significant. (Draft SEIR, pp. 17-14 to 17-17.)

Impact C-UT-2: Implementation of the proposed Transit District DTPP Amendments, in combination with past, present, existing, approved, pending, and reasonably foreseeable future projects in the vicinity and Citywide, would not contribute considerably to cumulative impacts on solid waste.

San Mateo County is currently revising the Siting Element of its Countywide Integrated Waste Management Plan, which will identify facilities and proposed programs that would provide San Mateo County with sufficient disposal capacity to meet the statutorily required minimum of 15 years of combined permitted disposal capacity (Public Resources Code Section 41260). Cumulative development projects would also be required to comply with federal, state, and local solid waste standards, including waste diversion during construction, including at least 65 percent construction and demolition waste diversion, and during operation, including recycling and organic material diversion requirements. As such, non-renewable sources of solid waste and the solid waste disposal requirements of cumulative development would be reduced. Therefore, when considered in the cumulative context, the proposed Transit District DTPP Amendments' solid waste-related impacts would not be cumulatively considerable and would not result in new or more severe cumulative impacts than what was identified in the DTPP Final EIR. Cumulative impacts would, therefore, be less than significant. (Draft SEIR, p. 17-20.)

Impact C-UT-3: Implementation of the proposed Transit District DTPP Amendments, in combination with past, present, existing, approved, pending, and reasonably foreseeable future projects in the vicinity and Citywide, would not contribute considerably to cumulative impacts on hydrology and water quality.

While future developments in the DTPP area could contribute cumulatively to hydrology and water quality impacts, all new developments would be subject to the same local and state laws and regulations. Compliance with these laws would address any potential impacts to hydrology and water quality. As all new development within the Transit District area would be within the DTPP area would be subject to the same

local and state laws (i.e., the City, County, and the RWQCB), the cumulative impacts to related to hydrology and water quality from implementation of the proposed Transit District DTPP Amendments would not be considerable and would not result in new or more severe cumulative impacts than the impacts identified in the DTPP Final EIR. Cumulative impacts would therefore be less than significant. (Draft SEIR, p. 17-21.)

Impact C-NO-1: Implementation of the proposed Transit District DTPP Amendments, in combination with past, present, existing, approved, pending, and reasonably foreseeable future projects in the vicinity, would not contribute considerably to cumulative noise impacts.

The traffic noise associated with the proposed Transit District DTPP Amendments would not represent a cumulatively considerable contribution to this cumulative impact and would, in fact, serve to reduce this predicted significant cumulative impact. While there would be a cumulative traffic noise impact along two of the 14 roadways analyzed, the proposed Transit District DTPP Amendments would not contribute to this cumulative impact and would not result in new or more severe cumulative impacts than the impacts identified in the DTPP Final EIR. The cumulative traffic noise impacts resulting from the proposed Transit District DTPP Amendments would be *less than significant*. (Draft SEIR, pp. 17-21 to 17-23.)

Impact C-AQ-3: Adoption of the Transit District, in combination with past, present, existing, approved, pending, and reasonably foreseeable future projects, would not result in a cumulatively considerable contribution to local odor impacts.

The Transit District area does not contain any major sources of odor that would contribute to a cumulative odor impact in the vicinity. Odor sources associated with food service establishments in the Transit District area would be enforced through compliance with BAAQMD Rule 6-2. Therefore, the proposed Transit District DTPP Amendments' cumulative impact with respect to odors would not result in new or more severe cumulative impacts than what was identified in the DTPP Final EIR. Cumulative impacts would not be considerable and therefore would be less than significant. (Draft SEIR, pp. 17-23 to 17-24.)

Impact C-CC-2: The proposed Transit District DTPP Amendments, in conjunction with past, present, existing, approved, pending, and reasonably foreseeable future projects in the City, would not result in energy use that would be considered wasteful and unnecessary or conflict with or obstruct a state or local plan for renewable energy or energy efficiency under cumulative conditions.

The proposed Transit District DTPP Amendments, in conjunction with cumulative development in the City, would allow increased development in an already developed area and result in increased energy consumption. Potential impacts to energy resources from future development in the Transit District area would require applications for development permits that would be evaluated for code compliance on a case-by-case basis. Thus, all subsequent development projects proposed within the Transit District area would be subject to compliance with all federal, state, and local requirements for energy efficiency, including the California Energy Code Building Energy Efficiency Standards, the CALGreen Code, and SB 743. Consequently, subsequent projects within the Transit District area would not result in significant environmental impacts from the wasteful, inefficient, or unnecessary consumption of energy resources during construction or operation; and would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, the proposed Transit District DTPP Amendments would not result in new or more severe cumulative impacts than were identified in the DTPP Final EIR and the cumulative energy impact would be less than significant. (Draft SEIR, pp. 17-27 to 17-28.)

Impact C-HAZ-1: The proposed Transit District DTPP Amendments, in combination with past, present, existing, approved, pending, and reasonably foreseeable future projects would result in less-than-significant cumulative impacts related to hazards and hazardous materials.

Other projects and developments being implemented in the area will be required to comply with the same existing laws and regulations that future developments allowed under the proposed Transit District DTPP Amendments will comply with. Further, as all new development within the Transit District area would be subject to existing laws and regulations and subject to applicable mitigation measures, the cumulative impacts from implementation of the proposed Transit District DTPP Amendments would not result in new or more severe cumulative impacts than the impacts identified in the DTPP Final EIR. Cumulative impacts would therefore be less than significant. (Draft SEIR, pp. 17-28 to 17-29.)

Impact C-BIO-1: The proposed Transit District DTPP Amendments, in combination with past, present, existing, approved, pending, and reasonably foreseeable future projects would result in less-than-significant cumulative impacts related to biological resources.

Anticipated cumulative development would not have the potential to cause a substantial adverse change in significant biological resources due to the low existing habitat values within the DTPP area, including the Transit District area. The proposed Transit District Amendments would not result in new or more severe cumulative impacts on biological resources than the impact identified in the DTPP Final EIR. Cumulative impacts would therefore be less than significant. No mitigation is required. (Draft SEIR, p. 17-29.)

Impact C-GEO-1: The proposed Transit District DTPP Amendments, in combination with past, present, existing, approved, pending, and reasonably foreseeable future projects would result in less-than-significant cumulative impacts related to geology and soils.

Other projects and developments being implemented in the area (either past, present, or future) would—or have already—complied with similar mitigation measures as the ones proposed as part of the proposed Transit District Amendments, and comply with the same existing laws and regulations that future developments allowed under the proposed Transit District Amendments will comply with. Therefore, the proposed Transit District Amendments would not result in new or more severe cumulative impacts related to geology and soils than the impacts identified in the DTPP Final EIR. Cumulative impacts from implementation of the proposed Transit District Amendments would be less than significant. (Draft SEIR, pp. 17-29 to 17-30.)

B. Findings Regarding Potentially Significant Impacts

The following potential environmental impacts of the Transit District DTPP Amendments were determined to be potentially significant and to require mitigation measures to avoid their effects or to reduce their severity, as set forth in Chapter 7, Chapters 10 through 13, and Chapters 15 through 17 of the DSEIR, as incorporated into the FSEIR. The City Council concurs with the conclusions in the DSEIR, as incorporated into the FSEIR, and makes the following findings with respect to such potentially significant impacts.

7. Cultural and Historic Resources and Tribal Cultural Resources

Impact CR-1: Implementation of the proposed Transit District DTPP Amendments would not cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.

Mitigation Measures. SEIR Mitigation Measures CR-1 and NO-3 (FSEIR, pp. 7-18 to 7-19) will be implemented for the Project as provided in the MMRP.

Findings Regarding Impact CR-1: Based on the FSEIR and the entire record before the City, the Council finds that incorporating the requirements of Mitigation Measures CR-1 and NO-3 into the Project would substantially lessen the severity of Impact CR-1, such that this impact would be less than significant. Mitigation Measure CR-1 would require each discretionary development project that is adjacent to a historic resource to be reviewed by a qualified architect or architectural historian to identify site and architectural design modifications to avoid a “substantial adverse change” in the significance of the adjacent historic resource and protect its continued eligibility for listing on the California Register, required as conditions of project approval. Mitigation Measure NO-3 would impose conditions of approval that require the Project Applicant to ensure that ground-borne vibration abatement measures are implemented by the construction contractor to reduce ground-borne vibration levels generated by future site-specific demolition and construction activities that would be experienced at adjacent historic resources.

Impact CR-2: Implementation of the proposed Transit District DTPP Amendments would not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.

Mitigation Measures. SEIR Mitigation Measure CR-2 (FSEIR, pp. 7-19 to 7-20) will be implemented for the Project as provided in the MMRP.

Findings Regarding Impact CR-2: Based on the FSEIR and the entire record before the City, the Council finds that Mitigation Measure CR-2 would substantially lessen the severity of Impact CR-2, such that this potential impact would be less than significant. Mitigation Measure CR-2 requires that i) prior to issuance of grading permits with the Transit District area construction crews would be trained regarding possible presence of cultural resources and laws and procedures for protecting cultural resources, ii) that work will be stopped if archaeological resources are discovered on the project site, iii) a qualified archaeologist be retained to evaluate the significance of cultural resources, and iv) appropriate steps be taken to avoid, protect and preserve such resources as described in Mitigation Measure CR-2.

Impact CR-4: Implementation of the proposed Transit District DTPP Amendments would not cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC 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.

Mitigation Measures. SEIR Mitigation Measure CR-2 (FSEIR, pp. 7-19 to 7-20) will be implemented for the Project as provided in the MMRP.

Findings Regarding Impact CR-4: Based on the FSEIR and the entire record before the City, the Council finds that Mitigation Measure CR-2 would substantially lessen the severity of Impact CR-4, such that this potential impact would be less than significant, because the measures described in Mitigation CR-2 (as summarized above), in combination with the Cultural Resources Management Plan and existing laws establish sufficient protocol to identify, evaluate, and treat any tribal cultural resources which may be impacted by ground-disturbing projects in the Transit District area.

10. Utilities and Infrastructure, Hydrology and Water Quality

Impact UT-1: Implementation of the proposed Transit District DTPP Amendments would not require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.

Mitigation Measures. SEIR Mitigation Measure UT-1 (FSEIR, p. 10-25) will be implemented for the Project as provided in the MMRP.

Findings Regarding Impact UT-1: Based on the FSEIR and the entire record before the City, the Council finds that Mitigation Measure UT-1 would substantially lessen the severity of Impact UT-1, such that this potential impact would be less than significant because development projects in the Transit District area shall pay a fair-share contribution towards the cost of providing emergency water storage for all proposed uses to fund the design and construction of such storage, which would ensure un-interruption of water supply in case of a potential drought or disaster-caused emergency.

Impact UT-2: With implementation of the proposed Transit District DTPP Amendments, the City would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.

Mitigation Measures. SEIR Mitigation Measure UT-2 (FSEIR, p. 10-29) will be implemented for the Project as provided in the MMRP.

Findings Regarding Impact UT-2: Based on the FSEIR and the entire record before the City, the Council finds that Mitigation Measure UT-2 would substantially lessen the severity of Impact UT-2, such that this potential impact would be less than significant because the developer of a development project in the Transit District area would be required to install an extension of recycled water supply pipelines to the development project with sufficient recycled water capacity to provide for all of the project's recycled water demands while achieving the required pressure, flow, and other system design criteria of recycled water system pursuant to City standards, which will ensure the improvements are sufficiently certain, adequately funded, and can be implemented over time.

11. Noise and Vibration

Impact NO-1: Implementation of the proposed Transit District DTPP Amendments would not generate a substantial temporary 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.

Mitigation Measures. SEIR Mitigation Measure NO-1 (FSEIR, pp. 11-20 to 11-21) will be implemented for the Project as provided in the MMRP.

Findings Regarding Impact NO-1: Based on the FSEIR and the entire record before the City, the Council finds that Mitigation Measure NO-1 would substantially lessen the severity of Impact NO-1, such that this potential impact would be less than significant because it will require conventional construction-period noise abatement measures as conditions of approval for all future projects involving demolition and construction activities.

Impact NO-2: Implementation of the proposed Transit District DTPP Amendments would not generate a substantial 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.

Mitigation Measures. SEIR Mitigation Measure NO-2 (FSEIR, p. 11-22) will be implemented for the Project as provided in the MMRP.

Findings Regarding Impact NO-2: Based on the FSEIR and the entire record before the City, the Council finds that Mitigation Measure NO-2 would substantially lessen the severity of Impact NO-2, such that this potential impact would be less than significant because an acoustical study shall be prepared by a qualified acoustical engineer during final building design to evaluate the potential noise generated by building mechanical equipment and to identify the necessary design measures to be incorporated to meet the performance standards of Chapters 36.7.B of the City's Redwood City Zoning Code.

Impact NO-3: Implementation of the proposed Transit District DTPP Amendments would not generate excessive groundborne vibration or groundborne noise levels.

Mitigation Measures. SEIR Mitigation Measure NO-3 (FSEIR, p. 11-25) will be implemented for the Project as provided in the MMRP.

Findings Regarding Impact NO-3: Based on the FSEIR and the entire record before the City, the Council finds that Mitigation Measure NO-3 would substantially lessen the severity of Impact NO-3, such that this potential impact would be less than significant. Mitigation Measure NO-3 would impose conditions of approval that require the Project Applicant to ensure that ground-borne vibration abatement measures are implemented by the construction contractor to reduce ground-borne vibration levels generated by future site-specific demolition and construction activities. Those conditions will: restrict the hours in which vibration-generating activity is permitted; require written notice of projected construction schedules be provided to affected occupants; require pre-construction site surveys to document the condition of any historic structure located within 200 feet of pile driving activities; and require monitoring of pile driving vibration levels to within appropriate thresholds.

12. Air Quality

Impact AQ-2: Adoption of the proposed Transit District DTPP Amendments would 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.

Mitigation Measures. SEIR Mitigation Measures AQ-2a and AQ-2b (FSEIR, pp. 12-34 to 12-36) will be implemented for the Project as provided in the MMRP.

Findings Regarding Impact AQ-2: Based on the FSEIR and the entire record before the City, the Council finds that Mitigation Measures AQ-2a and AQ-2b would substantially lessen the severity of Impact AQ-2. Mitigation Measure AQ-2a would require implementation of best management practices consistent with BAAQMD recommendations fugitive dust emissions. Mitigation Measure AQ-2b requires that for projects that exceed BAAQMD screening levels, a project-level criteria air pollutant assessment of construction and operational emissions shall be prepared at the time the project is proposed; and if the analysis finds that the project could result in criteria air pollutant emissions that exceed BAAQMD significance thresholds, the project applicant emission reduction measures shall be implemented to the degree necessary to reduce the impact to less than the significance thresholds. This includes the use of clean construction equipment (e.g., electric construction equipment, diesel engines with Tier 4 Final of-road emissions standards; limiting idling time); operational emission reductions (e.g., provision of all electric gas infrastructure and EV charging infrastructure); and payment of emission offset fees. However, since the specific emissions associated with future projects are not currently known, the effectiveness of emission reduction measures cannot be definitively determined; and implementation of any emissions reduction project(s) that would be undertaken by BAAQMD are outside the jurisdiction and control of the City and not fully within the control of the project applicants. Consequently, air pollutants from construction and operation of subsequent projects developed under the proposed Transit District DTPP Amendments could result in a new and more severe impact than the impact identified in the DTPP FEIR, and impact would conservatively be *significant and unavoidable*. The City Council hereby finds, however, that there are specific economic, environmental, social, legal, technological and other considerations that make infeasible the potential mitigation measures described in the SEIR to mitigate the effect of Impact AQ-2, and that development of the Project will provide specific economic, environmental, social, legal, technological and other benefits that will outweigh the significant adverse effects of Impact AQ-2, as set forth in the Statement of Overriding Considerations below. This finding is based on the entire record of proceedings for the Project, including but not limited to the discussion and analysis set forth on pages 12-29 through 12-37 of the DSEIR, which includes a full statement of the impact and is hereby incorporated herein in its entirety.

Impact AQ-3: Adoption of the proposed Transit District DTPP Amendments would not expose sensitive receptors to substantial pollutant concentrations.

Mitigation Measures. SEIR Mitigation Measure AQ-3 (FSEIR, p. 12-40) will be implemented for the Project as provided in the MMRP.

Findings Regarding Impact AQ-3: Based on the FSEIR and the entire record before the City, the Council finds that Mitigation Measure AQ-3 would substantially lessen the severity of Impact AQ-3, such that this potential impact would be less than significant. Mitigation Measure AQ-3 would require subsequent projects within 1,000 feet of existing or approved sensitive receptors to undergo a project-level health risk assessment (HRA) at the time the project is proposed and to utilize the clean construction equipment required by Mitigation Measure AQ-2b if the project-specific health risk thresholds are exceeded.

13. Climate Change

Impact CC-1: Implementation of the proposed Transit District DTPP Amendments would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

Mitigation Measures. SEIR Mitigation Measure CC-1 (FSEIR, pp. 13-35 to 13-36) will be implemented for the Project as provided in the MMRP.

Findings Regarding Impact CC-1: Based on the FSEIR and the entire record before the City, the Council finds that Mitigation Measure CC-1 would substantially lessen the severity of Impact CC-1. Subsequent development projects shall comply with the “all electric” requirement in the City’s Reach Codes in effect at the time that a building permit application is filed, and shall comply with EV requirements in CALGreen Tier 2 in the most recently adopted version of CALGreen Tier 2 at the time that a building permit application is filed. However, while Mitigation Measure CC-1 would disallow these exceptions within the Transit District area, this mitigation measure may not be feasible for economic or other reasons. Because the Redwood City Reach Codes are less than two years old, and are, as such, a recently adopted statement of City policy, full implementation of Mitigation Measure CC-1 may not be feasible. Accordingly, this impact is conservatively determined to be *significant and unavoidable*. The City Council hereby finds, however, that there are specific economic, environmental, social, legal, technological and other considerations that make infeasible the potential mitigation measures described in the SEIR to mitigate the effect of Impact CC-1, and that development of the Project will provide specific economic, environmental, social, legal, technological and other benefits that will outweigh the significant adverse effects of Impact CC-1, as set forth in the Statement of Overriding Considerations below. This finding is based on the entire record of proceedings for the Project, including but not limited to the discussion and analysis set forth on pages 13-32 through 13-36 of the DSEIR, which includes a full statement of the impact and is hereby incorporated herein in its entirety.

Impact CC-2: Implementation of the proposed Transit District DTPP Amendments would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Mitigation Measures. SEIR Mitigation Measure CC-1 (FSEIR, p. 13-41) will be implemented for the Project as provided in the MMRP.

Findings Regarding Impact CC-2: Based on the FSEIR and the entire record before the City, the Council finds that Mitigation Measure CC-1 would substantially lessen the severity of Impact CC-2. With implementation of Mitigation Measure CC-1, the proposed Transit District DTPP Amendments would not conflict with the GHG reduction targets established by Executive Order S-3-05, and SB 32, or the reduction measures identified in CARB’s 2017 Scoping Plan. In addition, the proposed Transit District DTPP Amendments would not conflict with Plan Bay Area or the Redwood City Climate Action Plan, and would be subject to measures in the CALGreen Code and the Redwood City Reach Codes. However, as explained under the findings for Impact CC-1, Mitigation Measure CC-1 may not be feasible for economic or other reasons, and as such, full implementation of Mitigation Measure CC-1 may not be feasible. Accordingly, this impact is conservatively determined to be *significant and unavoidable*. The City Council hereby finds,

however, that there are specific economic, environmental, social, legal, technological and other considerations that make infeasible the potential mitigation measures described in the SEIR to mitigate the effect of Impact CC-2, and that development of the Project will provide specific economic, environmental, social, legal, technological and other benefits that will outweigh the significant adverse effects of Impact CC-2, as set forth in the Statement of Overriding Considerations below. This finding is based on the entire record of proceedings for the Project, including but not limited to the discussion and analysis set forth on pages 13-36 through 13-41 of the DSEIR, which includes a full statement of the impact and is hereby incorporated herein in its entirety.

15. Biological Resources

Impact BIO-1: Implementation of the proposed Transit District DTPP Amendments would not 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.

Mitigation Measures. SEIR Mitigation Measure BIO-1 (FSEIR, p. 15-7) will be implemented for the Project as provided in the MMRP.

Findings Regarding Impact BIO-1: Based on the FSEIR and the entire record before the City, the Council finds that Mitigation Measure BIO-1 would substantially lessen the severity of Impact BIO-1, such that this potential impact would be less than significant. Mitigation Measure BIO-1 would reduce the impact to nesting birds to a less than significant level because it would require all tree removal or trimming and ground disturbing activities to be scheduled outside of the breeding season, or if that is not feasible, then the measure requires steps to be taken to avoid any significant impacts to nests based on consultation with the California Department of Fish and Game.

Impact BIO-4: Implementation of the proposed Transit District DTPP Amendments would not 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.

Mitigation Measures. SEIR Mitigation Measure BIO-1 (FSEIR, p. 15-9) will be implemented for the Project as provided in the MMRP.

Findings Regarding Impact BIO-4: Based on the FSEIR and the entire record before the City, the Council finds that Mitigation Measure BIO-1 would substantially lessen the severity of Impact BIO-4, such that this potential impact would be less than significant. Mitigation Measure BIO-1 would reduce the impact to potential nesting migratory birds to a less than significant level because it would require all tree removal or trimming and ground disturbing activities to be scheduled outside of the breeding season, or if that is not feasible, then the measure requires steps to be taken to avoid any significant impacts to nests based on consultation with the California Department of Fish and Game.

Impact BIO-5: Implementation of the proposed Transit District DTPP Amendments would not conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

Mitigation Measures. SEIR Mitigation Measure BIO-5 (FSEIR, p. 15-9) will be implemented for the Project as provided in the MMRP.

Findings Regarding Impact BIO-5: Based on the FSEIR and the entire record before the City, the Council finds that Mitigation Measure BIO-5 would substantially lessen the severity of Impact BIO-5, such that this potential impact would be less than significant. Mitigation Measure BIO-5 would require that any project in the Transit District area that would involve the removal of any tree complete the application and review process specified in the City's Tree Preservation Ordinance (Municipal Code chapter 35) prior to project approval.

16. Geology and Soils

Impact GEO-2: Implementation of the proposed Transit District DTPP Amendments would not result in substantial soil erosion or the loss of topsoil.

Mitigation Measures. SEIR Mitigation Measure GEO-2 (FSEIR, p. 16-10) will be implemented for the Project as provided in the MMRP.

Findings Regarding Impact GEO-2: Based on the FSEIR and the entire record before the City, the Council finds that Mitigation Measure GEO-2 would substantially lessen the severity of Impact GEO-2, such that this potential impact would be less than significant. Mitigation Measure GEO-2 would reduce soil erosion and sedimentation impacts to a less than significant level because it would require applicants for future development projects in the Transit District area involving a grading area of 10,000 or more square feet to prepare erosion control plans subject to City approval and consistent with the project Stormwater Pollution Prevention Plans (SWPPPs) as well as BMPs specified by the Redwood City Stormwater Management and Discharge Control Program (Municipal Code 27A) to be implemented during construction.

Impact GEO-4: Implementation of the proposed Transit District DTPP Amendments would not be located on expansive or corrosive soil creating substantial direct or indirect risks to life or property.

Mitigation Measures. SEIR Mitigation Measures GEO-4a and GEO-4b (FSEIR, pp. 16-11 to 16-12) will be implemented for the Project as provided in the MMRP.

Findings Regarding Impact GEO-4: Based on the FSEIR and the entire record before the City, the Council finds that Mitigation Measures GEO-4a and GEO-4b would substantially lessen the severity of Impact GEO-4, such that this potential impact would be less than significant. Mitigation Measure GEO-4a would reduce expansive soil impacts to a less than significant level because it would 1) require analysis of expansive soil hazards and full remediation of expansive soils, or site specific recommendations to fully mitigate the effects of weak or expansive soils, as reviewed by a City-retained registered geologist, that are submitted with the building permit application, and 2) require deed restrictions to prohibit significant modification of finished lot grades that would adversely affect site drainage. Mitigation Measure GEO-4b would 1) require water systems and other buried metal infrastructure in all future development within the Transit District area to have

protective coating conforming to the City's water system design criteria and specifications; and 2) require concrete mix designs to conform to state Department of Transportation standards regarding corrosion.

Impact GEO-6: Implementation of the proposed Transit District DTPP Amendments would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Mitigation Measures. SEIR Mitigation Measure GEO-6 (FSEIR, p. 16-13) will be implemented for the Project as provided in the MMRP.

Findings Regarding Impact GEO-6: Based on the FSEIR and the entire record before the City, the Council finds that Mitigation Measure GEO-6 would substantially lessen the severity of Impact GEO-6, such that this potential impact would be less than significant. Mitigation Measure GEO-6 would require that prior to issuance of grading or demolition permits, the City, in coordination with a qualified paleontologist, shall assess individual development project proposals within the Transit District area for the potential to destroy or damage unique paleontological resources. Should the paleontologist determine that the proposal has the potential to damage paleontological resources, the paleontologist shall provide to the City detailed procedures for the avoidance or preservation of these resources, or for complete data recovery concerning these resources.

17. Cumulative Impacts

Impact C-UT-1: Implementation of the proposed Transit District DTPP Amendments, in combination with past, present, existing, approved, pending, and reasonably foreseeable future projects in the vicinity and Citywide, would not contribute considerably to cumulative impacts on utilities and service systems.

Mitigation Measures. SEIR Mitigation Measures UT-1 and UT-2 (FSEIR, p. 17-18) will be implemented for the Project as provided in the MMRP.

Findings Regarding Impact C-UT-1: Based on the FSEIR and the entire record before the City, the Council finds that Mitigation Measures UT-1 and UT-2 would substantially lessen the severity of Impact C-UT-1, such that this potential impact would be less than significant. Under Mitigation Measure UT-1, development projects in the Transit District area shall pay a fair-share contribution towards the cost of providing emergency water storage for all proposed uses to fund the design and construction of such storage for Downtown, which would also apply to cumulative development. Implementation of this mitigation measure would ensure un-interruption of water supply in case of a potential drought or disaster-caused emergency. In addition, implementation of Mitigation Measure UT-2 requires all development in the Transit District area recycled water infrastructure to each project's location, and this measure would also be applicable to cumulative development projects.

Impact C-AQ-1: Adoption of the proposed Transit District DTPP Amendments would result in a cumulatively considerable contribution to the regional cumulative air quality impacts.

Mitigation Measures. SEIR Mitigation Measure AQ-2b (FSEIR, p. 17-24) will be implemented for the Project as provided in the MMRP.

Findings Regarding Impact C-AQ-1: Based on the FSEIR and the entire record before the City, the Council finds that Mitigation Measure AQ-2b would substantially lessen the severity of Impact C-AQ-1. Mitigation Measure AQ-2b requires that for projects that exceed BAAQMD screening levels, a project-level criteria air pollutant assessment of construction and operational emissions shall be prepared at the time the project is proposed; and if the analysis finds that the project could result in criteria air pollutant emissions that exceed BAAQMD significance thresholds, the project applicant emission reduction measures shall be implemented to the degree necessary to reduce the impact to less than the significance thresholds. However, as explained under Impact AQ-2, even with implementation of Mitigation Measure AQ-2b, it cannot be stated with certainty that criteria air pollutant impacts associated with all subsequent development projects would be reduced to less-than-significant levels. As such, criteria pollutant emissions from construction and operation of subsequent projects in the Transit District area would be *significant and unavoidable*, on a cumulative basis and would be a new impact not previously identified in the DTPP Final EIR. The City Council hereby finds, however, that there are specific economic, environmental, social, legal, technological and other considerations that make infeasible the potential mitigation measures described in the SEIR to mitigate the effect of Impact C-AQ-1, and that development of the Project will provide specific economic, environmental, social, legal, technological and other benefits that will outweigh the significant adverse effects of Impact C-AQ-1, as set forth in the Statement of Overriding Considerations below. This finding is based on the entire record of proceedings for the Project, including but not limited to the discussion and analysis set forth on pages 17-23 to 17-24 of the DSEIR, which includes a full statement of the impact and is hereby incorporated herein in its entirety.

Impact C-AQ-2: Adoption of the proposed Transit District DTPP Amendments, in combination with past, present, existing, approved, pending, and reasonably foreseeable future projects, would not result in a cumulatively considerable contribution to local health risk impacts.

Mitigation Measures. SEIR Mitigation Measure AQ-3 (FSEIR, p. 17-25) will be implemented for the Project as provided in the MMRP.

Findings Regarding Impact C-AQ-3: Based on the FSEIR and the entire record before the City, the Council finds that Mitigation Measure AQ-3 would substantially lessen the severity of Impact AQ-3, such that this potential impact would be less than significant. Mitigation Measure AQ-3 would require subsequent projects within 1,000 feet of existing or approved sensitive receptors to undergo a project-level HRA at the time the project is proposed and to utilize the clean construction equipment required by Mitigation Measure AQ-2b if the project-specific health risk thresholds are exceeded. Therefore, the contribution of the proposed Transit District DTPP Amendments to the cumulative health risk would not be considerable and would not result in new or more severe cumulative impacts than the impact identified in the DTPP Final EIR.

Impact C-CC-1: Implementation of the proposed Transit District DTPP Amendments, in combination with past, present, existing, approved, pending, and reasonably foreseeable future projects, would not result in a cumulatively considerable contribution to GHG emissions that may have a significant impact on the environment or conflict with applicable plans, policies or regulations adopted for the purpose of reducing the emissions of greenhouse gases.

Mitigation Measures. SEIR Mitigation Measure CC-1 (FSEIR, p. 17-27) will be implemented for the Project as provided in the MMRP.

Findings Regarding Impact C-CC-1: Based on the FSEIR and the entire record before the City, the Council finds that Mitigation Measure CC-1 would substantially lessen the severity of Impact C-CC-1. However, as explained under Impact CC-1, above, because the Redwood City Reach Codes are less than two years old, and are, as such, a recently adopted statement of City policy, full implementation of Mitigation Measure CC-1 may not be feasible. Accordingly, as with the project impact, the cumulative impact is conservatively determined to be *significant and unavoidable*. The City Council hereby finds, however, that there are specific economic, environmental, social, legal, technological and other considerations that make infeasible the potential mitigation measures described in the SEIR to mitigate the effect of Impact CC-1, and that development of the Project will provide specific economic, environmental, social, legal, technological and other benefits that will outweigh the significant adverse effects of Impact C-CC-1, as set forth in the Statement of Overriding Considerations below. This finding is based on the entire record of proceedings for the Project, including but not limited to the discussion and analysis set forth on pages 17-26 through 17-27 of the DSEIR, which includes a full statement of the impact and is hereby incorporated herein in its entirety.

VI. Findings Regarding Project Alternatives

The CEQA Guidelines require that an EIR describe a reasonable range of alternatives that would feasibly attain most of the basic project objectives but would avoid or substantially lessen any of the significant environmental effects of the project, and then evaluate the comparative merits of such alternatives. (Guidelines §15126(a)).

A. City's Objectives for the Project

The proposed Transit District DTPP Amendments would consist of amendments to the Redwood City General Plan and DTPP to achieve the following City objectives:

- To establish a new sub-area within the DTPP—the Transit District—focused on transit oriented development with a new hub of office, residential and retail uses adjacent to the Redwood City Transit Center, including the Caltrain Station and the SamTrans bus depot, thereby potentially minimizing automobile travel and vehicle miles traveled, consistent with the City's greenhouse gas reduction goals.
- To allow for redevelopment of the existing Transit Center and Sequoia Station properties with a mix of retail, office, and residential uses that is responsive to market demands and can be constructed within existing height limitations (i.e., no changes to the maximum height allowed) and that maximizes development potential of the area in terms of both job and housing opportunities;
- To anticipate a potential future four-track Caltrain station, north of the existing station, that would allow for expanded service with completion of Caltrain's electrification program (currently under construction)

and for long-term implementation of the Caltrain Business Plan, which calls for substantially increased frequency of service and the use of the Redwood City Transit Center as a transfer point between local and express trains;

- To designate land uses appropriate to the Transit District area and the total amount of development to be permitted in the Transit District area. To that end, establish a separate development cap for office use that is distinct from, and not subject to, the office cap applicable to the remainder of the DTPP, and to allow residential uses that contribute to a thriving hub of office, residential and retail uses;
- To make circulation improvements to promote quality vehicular, bicycle and pedestrian connections;
- To lower the parking requirement to reflect anticipated reduced future parking demand, current best practices and future plans for Caltrain track expansion that will encourage nondriving modes of transportation while continuing to incentivize shared parking and the ability for project applicants to pay a fee to the City in lieu of providing new parking spaces;
- To require frontage improvements to support active transportation consistent with RWCmoves, Redwood City's Citywide Transportation Plan; with the City's El Camino Real Corridor Plan; and with the City's in-progress Vision Zero strategy to eliminate traffic fatalities and severe injuries and the RWC Walk Bike Thrive initiative;
- To provide options for more design flexibility to allow for increased diversity in architecture and style; and
- To maintain existing DTPP maximum building height limits (i.e., no changes to the maximum allowable height) in the proposed Transit District, but allow for some development flexibility by permitting limited exceptions to building placement requirements (i.e., build-to-corner, building setback, and frontage coverage requirements) to allow corner setbacks, other setbacks from the street, and lesser lot coverage than is currently required; and lowering the required minimum heights from 35 feet to 25 feet, or less with a potential exception. The exceptions would allow for reduced massing and shadows, an enhanced pedestrian experience, and provide support for ground floor retail.

B. Significant Environmental Impacts of the Project

Based on the analyses in Chapters 4 through 17 of the DSEIR, the City has determined that all of the proposed Project's potentially significant environmental effects would be avoided or reduced to less-than-significant levels through implementation of the mitigation measures described in the DSEIR and MMRP, except for the following:

- **Impact AQ-2:** Adoption of the proposed Transit District DTPP Amendments would 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.
- **Impact CC-1:** Implementation of the proposed Transit District DTPP Amendments would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.
- **Impact CC-2:** Implementation of the proposed Transit District DTPP Amendments would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

- **Impact C-AQ-1:** Adoption of the proposed Transit District DTPP Amendments would result in a cumulatively considerable contribution to the regional cumulative air quality impacts.
- **Impact C-CC-1:** Implementation of the proposed Transit District DTPP Amendments, in combination with past, present, existing, approved, pending, and reasonably foreseeable future projects, would not result in a cumulatively considerable contribution to GHG emissions that may have a significant impact on the environment or conflict with applicable plans, policies or regulations adopted for the purpose of reducing the emissions of greenhouse gases.

C. Project Alternatives Descriptions

Through the environmental review process, the City identified the following three (3) Project alternatives for consideration:

No Project Alternative. Under the No Project Alternative, the proposed Transit District DTPP Amendments would not be created as a separate sub-area within the DTPP. Instead, the area proposed as the Transit District would remain under the land use controls of the existing DTPP, as it may be amended in the future. There would be no creation of a Transit District-specific development cap for office use or the addition of residential development potential specific to the Transit District area, nor would there be any district-specific circulation improvements or changes in land use controls (development standards) related to building design, building massing, circulation, and parking in the DTPP to support transit-oriented development. The No Project Alternative, unlike the proposed Transit District DTPP Amendments, would not anticipate space for the envisioned Caltrain improvements.

Reduced Development Alternative. Under the Reduced Scale Alternative, an overall lesser amount of allowed office and residential development would be assumed, compared to that with the proposed Transit District DTPP Amendments. Like the proposed project, this alternative would consist of amendments to the City's General Plan and DTPP that would create a Transit District area within the DTPP area focused on transit-oriented development. However, the Reduced Development Alternative would establish an office development cap for the Transit District area of 1.1 million square feet, about two-thirds of the office development cap proposed under the Transit District DTPP Amendments. Under this alternative, the assumed residential development would likewise be about two-thirds of the project proposal, or 750 dwelling units. Like the proposed Transit District DTPP Amendments, the Reduced Development Alternative would anticipate a relocated and enlarged Caltrain station and tracks as part of a new and relocated Transit Center.

Altered Land Use Mix Alternative. This alternative would reduce the amount of office space and increase the number of residential units, compared to what is assumed under the proposed Transit District DTPP Amendments. Like the proposed project, this alternative would consist of amendments to the City's General Plan and DTPP that would create the Transit District area, within the DTPP area focused on transit-oriented development. However, the Altered Land Use Mix Alternative would establish an office development cap for the Transit District area of 800,000 square feet, about half of the office development cap proposed under the Transit District DTPP Amendments. Under the Altered Land Use Mix Alternative, the assumed residential development would be about 36 percent more than with the proposed Transit District DTPP Amendments, or 1,500 dwelling units. However, with a somewhat greater reduction, compared to the proposed Transit District DTPP Amendments, in office floor area relative to the increase in residential units, the total square footage of development would be about 15 percent less than with the proposed Transit District DTPP Amendments. Like the proposed Transit District DTPP Amendments, the Altered Land Use

Mix Alternative would anticipate a relocated and enlarged Caltrain station and tracks as part of a new and relocated Transit Center.

Reduced Office Alternative. Under the Reduced Office Alternative, a lesser amount of allowed office development would be assumed, compared to that with the proposed Transit District DTPP Amendments; however, the number of residential units would remain the same, at 1,100 units. Like the proposed project, this alternative would consist of amendments to the City’s General Plan and DTPP that would create a new sub-area, the Transit District area, within the DTPP area focused on transit-oriented development with approximately 16.6 acres of land located to the west of the Caltrain right-of-way. However, the Reduced Office Alternative would establish an office development cap for the Transit District area of 1.23 million square feet, about 75 percent of the office development cap proposed under the Transit District DTPP Amendments. Other aspects of the proposed Transit District DTPP Amendments, circulation improvements and changes to land use controls (development standards) related to, among other things, building design, building massing, circulation, and parking, would also be part of this alternative and would be the same as those with the proposed Transit District, or nearly so. Like the proposed Transit District DTPP Amendments, the Reduced Office Alternative would anticipate a relocated and enlarged Caltrain station and tracks as part of a new and relocated Transit Center.

D. Findings Relating to Alternatives

Based on the evaluation and analysis of Project alternatives set forth in Chapter 19 of the DSEIR, and on the entire record of proceedings for the Project, the City Council hereby makes the following findings:

Findings Relating to the No Project Alternative

Findings. The No Project Alternative is described and discussed on pages 19-11 to 19-12 of the DSEIR. The No Project is hereby rejected because it would not meet any of the City’s objectives for the proposed Transit District DTPP Amendments.

Explanation. Under the No Project Alternative, the existing DTPP would continue to govern the Transit District area. As a result, there would be no impacts related to the intensity of development related the Transit District DTPP Amendments, including: no increases in traffic, emissions of criteria air pollutants or toxic air contaminants, noise, vibration, or greenhouse gas emissions from construction or operation of new development in the Transit District; no increases in population or employment or increase in demand for public services or utilities from subsequent projects in the Transit District area; no disturbance of archaeological or tribal cultural resources, exposure of workers or the public to subsurface soil or groundwater contamination, or disturbance of paleontological resources; no building demolition that could adversely affect historical resources; no disturbance of nesting birds or tree removal that could result from construction of subsequent development projects in the Transit District area; and no development in the Transit District area on potentially expansive or corrosive soils.

The No Project Alternative would not meet any of the City’s objectives for the proposed Transit District DTPP Amendments, in that it would not:

- establish a new DTPP sub-area focused on transit-oriented development;
- allow for redevelopment of the existing Transit Center and Sequoia Station properties with a mix of retail, office, and residential uses;

- anticipate a potential future four-track Caltrain station;
- make circulation improvements;
- lower the parking requirement;
- require frontage improvements to support active transportation;
- provide options to allow for increased architectural diversity; or
- allow for exceptions, at certain sites, to requirements concerning building placement and required minimum heights.

Findings Relating to the Reduced Development Alternative

Findings. *The Reduced Development Alternative is described and discussed on pages 19-12 to 19-17 of the DSEIR. The Reduced Development Alternative is hereby rejected because it would not be expected to substantially reduce or avoid any of the significant effects of the proposed Transit District DTPP Amendments, and because this alternative would not achieve the City's housing and office development-related related objectives for the Project to the same degree as the proposed Transit District DTPP Amendments.*

Explanation. Under the Reduced Development Alternative, impacts related to the intensity of development—traffic; criteria air pollutants, toxic air contaminants, and greenhouse gas emissions; noise and vibration; population or employment; and demand for public services and utilities—would generally be reduced, compared to those of the proposed Transit District DTPP Amendments, as described below.

All transportation impacts of the Reduced Development Alternative would be less than significant, as with the proposed Transit District DTPP Amendments. In fact, the Reduced Development Alternative would result in 22 percent fewer daily vehicle trips and a similar decrease in daily VMT, compared to the proposed Transit District DTPP Amendments; and both residential and office VMT associated with this alternative would be below the City's VMT Thresholds, as under the proposed Transit District DTPP Amendments.

Like the proposed Transit District DTPP Amendments, the Reduced Development Alternative would result in a lesser percentage increase in VMT than in service population, and therefore, this alternative would not conflict with or obstruct implementation of the applicable air quality plan, and the Plan-level impact would be less than significant, as with the proposed Transit District DTPP Amendments. However, the Reduced Development Alternative, like the proposed Transit District DTPP Amendments, is conservatively concluded to have a significant unavoidable project and cumulative impact with respect to emissions of criteria air pollutants from individual subsequent development project(s), even with implementation of Mitigation Measures AQ-2a and AQ-2b. The Reduced Development Alternative could result in similar, albeit somewhat lesser, significant health risk impact as would the proposed Transit District DTPP Amendments, and would be similarly reduced to a less-than-significant level with implementation of Mitigation Measure AQ-3. The Reduced Development Alternative would be consistent with the applicable clean air plan and would have a less-than-significant impact, as under the Transit District DTPP Amendments.

The Reduced Development Alternative could result in similar, albeit somewhat lesser, significant climate change impacts as the proposed Transit District DTPP Amendments. However, as with the proposed Transit District DTPP Amendments, these impacts, as well as this alternative's cumulative climate change

impacts, would be reduced to a less-than-significant level with Mitigation Measure CC-1. Nevertheless, similar to the Transit District DTPP Amendments, full implementation of Mitigation Measure CC-1 may not be feasible, and, as a result, impacts of the Reduced Development Alternative with respect to climate change are likewise conservatively considered to be significant and unavoidable.

The Reduced Development Alternative could result in similar, albeit somewhat lesser, construction noise and vibration impacts compared to the Transit District DTPP Amendments, and likewise would be mitigated to a less-than-significant level with implementation of Mitigation Measure NO-1 and NO-3, respectively. The Reduced Development Alternative could result in similar, albeit somewhat lesser, building equipment noise impacts as the Transit District DTPP Amendments, and likewise be mitigated to a less-than-significant level with implementation of Mitigation Measure NO-2. Like the proposed Transit District DTPP Amendments, the Reduced Development Alternative would result in less-than-significant traffic noise impacts.

The Reduced Development Alternative, similar to the proposed Transit District DTPP Amendments, would have less-than-significant impacts with respect to population and housing less-than-significant impacts with respect to population and housing because it would not induce substantial unplanned growth and would not result in residential displacement.

The Reduced Development Alternative would result in less-than-significant impacts with respect to public services (police, fire, and emergency medical services; parks and recreational facilities; schools; and libraries), as under the proposed Transit District DTPP Amendments. The Reduced Development Alternative would also have less-than significant impacts with respect to utilities and infrastructure (including water quality; groundwater recharge; storm drainage; flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation; and consistency with a water quality control plan or sustainable groundwater management plan), as under the proposed Transit District DTPP Amendments.

Effects related to the footprint of subsequent development projects under the Reduced Development Alternative would generally be the same as or similar to those of the proposed Transit District DTPP Amendments although lesser overall development would occur within the proposed Transit District area, including related to disturbance of archaeological or tribal cultural resources, potential exposure during construction to subsurface soil or groundwater contamination, potential disturbance of paleontological resources, effects on historical resources, effects on corrosive soils and impacts on biological resources; and would be similarly mitigated to less than significant level with implementation of mitigation. As with the proposed Transit District DTPP Amendments, effects of the Reduced Development Alternative would be less than significant with respect to land use and aesthetics (including shadow).

As discussed above, on the whole, due to the overall reduced scale of development, this alternative was found to provide a greater decrease in significant environmental impacts, compared to those of the proposed Transit District DTPP Amendments, than the other alternatives considered. However, this alternative would not substantially lessen or avoid the significant and unavoidable air quality and climate change impacts of the proposed Transit District DTPP Amendments. In addition, to the extent that the demand for additional developed space that would otherwise be built pursuant to the proposed project would be met elsewhere in the Bay Area, employees in and residents of such development could potentially generate greater impacts on transportation systems (including VMT), air quality, and greenhouse gases than would be the case for development on the more compact and better-served-by-transit project site. This would be particularly likely

for development in more outlying parts of the region where fewer services and less transit access is provided. It is acknowledged that the Reduced Development Alternative would incrementally reduce local impacts in and around the project site and in Downtown Redwood City, while potentially increasing regional emissions of criteria air pollutants and greenhouse gases, as well as regional traffic congestion. Further to the extent that the demand for additional residential units, in particular, would be met through single-family homes rather than the multi-family housing assumed within the proposed Transit District, the Reduced Development Alternative could also result in greater water usage.

In addition, the Reduced Development Alternative would not fully meet important objectives of the proposed Transit District DTPP Amendments. The Reduced Development Alternative would provide for approximately one-third less new residential development (-350 units) and office development (-530,000 square feet under the development cap) within the Transit District area compared to that which would occur under the Transit District DTPP Amendments. As such, this alternative would not fully meet key project objectives for establishing a new hub of office, residential and retail uses adjacent to the Redwood City Transit Center; responding to market demands for retail, office and residential uses; maximizing the development potential of the Transit District Area for job and housing opportunities; and allowing residential uses that contribute to a thriving hub of office, residential and retail uses. As a result, the Reduced Development Alternative would not achieve the City's objectives for the Project to the same degree as the proposed Transit District DTPP Amendments.

Because the Reduced Development Alternative would not be expected to substantially reduce or avoid any of the significant effects that are expected from the mitigated Project, and because this alternative would not achieve the City's housing and office development-related objectives for the Project to the same degree as the proposed Transit District DTPP Amendments, the City hereby rejects the Reduced Development Alternative from further consideration.

Findings Relating to the Altered Land Use Mix Alternative

Findings. *The Altered Land Use Mix Alternative is described and discussed on pages 19-17 to 19-23 of the DSEIR. The Altered Land Use Mix Alternative is hereby rejected because it would not be expected to substantially reduce or avoid any of the significant effects of the proposed Transit District DTPP Amendments, and because this alternative would not achieve the City's office development-related objectives for the Project to the same degree as the proposed Transit District DTPP Amendments.*

Explanation. Under the Altered Land Use Mix Alternative, impacts related to the intensity of development—traffic; criteria air pollutants, toxic air contaminants, and greenhouse gas emissions; noise and vibration; population or employment; and demand for public services and utilities—would generally be reduced, compared to those of the proposed Transit District DTPP Amendments.

All transportation impacts of the Altered Land Use Mix Alternative would be less than significant, as with the proposed Transit District DTPP Amendments. In fact, the Altered Land Use Mix Alternative would result in 20 percent fewer daily vehicle trips and a similar decrease in daily VMT, compared to the proposed Transit District DTPP Amendments. The Altered Land Use Mix Alternative would generate somewhat greater VMT per resident but somewhat lesser VMT per employee than would the proposed Transit District DTPP Amendment, although both the residential and office VMT would be below the City's VMT Thresholds, as under the proposed Transit District DTPP Amendments.

Like the proposed Transit District DTPP Amendments, the Altered Land Use Mix Alternative would result in a lesser percentage increase in VMT than in service population, and therefore, this alternative would not conflict with or obstruct implementation of the applicable air quality plan, and the Plan-level impact would be less than significant, as with the proposed Transit District DTPP Amendments. However, the Altered Land Use Mix Alternative, like the proposed Transit District DTPP Amendments, is conservatively concluded to have a significant unavoidable project and cumulative impact with respect to emissions of criteria air pollutants from individual subsequent development project(s), even with implementation of Mitigation Measures AQ-2a and AQ-2b. The Altered Land Use Mix Alternative could result in similar, albeit somewhat lesser, significant health risk impact as would the proposed Transit District DTPP Amendments, and would be similarly reduced to a less-than-significant level with implementation of Mitigation Measure AQ-3. The Altered Land Use Mix Alternative would be consistent with the applicable clean air plan and would have a less-than-significant impact, as under the Transit District DTPP Amendments.

The Altered Land Use Mix Alternative could result in similar, albeit somewhat lesser, significant climate change impacts as the proposed Transit District DTPP Amendments. However, as with the proposed Transit District DTPP Amendments, these impacts, as well as this alternative's cumulative climate change impacts, would be reduced to a less-than-significant level with Mitigation Measure CC-1. Nevertheless, similar to the Transit District DTPP Amendments, full implementation of Mitigation Measure CC-1 may not be feasible, and, as a result, impacts of the Altered Land Use Mix Alternative with respect to climate change are likewise conservatively considered to be significant and unavoidable.

The Altered Land Use Mix Alternative could result in similar, albeit somewhat lesser, construction noise and vibration impacts compared to the Transit District DTPP Amendments, and likewise would be mitigated to a less-than-significant level with implementation of Mitigation Measure NO-1 and NO-3, respectively. The Altered Land Use Mix Alternative could result in similar, albeit somewhat lesser, building equipment noise impacts as the Transit District DTPP Amendments, and likewise be mitigated to a less-than-significant level with implementation of Mitigation Measure NO-2. Like the proposed Transit District DTPP Amendments, the Altered Land Use Mix Alternative would result in less-than-significant traffic noise impacts.

The Altered Land Use Mix Alternative, similar to the proposed Transit District DTPP Amendments, would have less-than-significant impacts with respect to population and housing less-than-significant impacts with respect to population and housing because it would not induce substantial unplanned growth and would not result in residential displacement.

The Altered Land Use Mix Alternative would result in less-than-significant impacts with respect to public services (police, fire, and emergency medical services; parks and recreational facilities; schools; and libraries), as under the proposed Transit District DTPP Amendments. The Altered Land Use Mix Alternative would also have less-than significant impacts with respect to utilities and infrastructure (including water quality; groundwater recharge; storm drainage; flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation; and consistency with a water quality control plan or sustainable groundwater management plan), as under the proposed Transit District DTPP Amendments. Annual water demand would be reduced by approximately 10 percent, compared to that with the proposed Transit District DTPP Amendments, but would be about 31 percent greater than with the Reduced Development Alternative, because residential use is generally more water-intensive than most non-residential uses.

Effects related to the footprint of subsequent development projects under the Altered Land Use Mix Alternative would generally be the same as or similar to those of the proposed Transit District DTPP Amendments although lesser overall development would occur within the proposed Transit District area, including related to disturbance of archaeological or tribal cultural resources, potential exposure during construction to subsurface soil or groundwater contamination, potential disturbance of paleontological resources, effects on historical resources, effects on corrosive soils and impacts on biological resources; and would be similarly mitigated to less than significant level with implementation of mitigation. As with the proposed Transit District DTPP Amendments, effects of the Altered Land Use Mix Alternative would be less than significant with respect to land use and aesthetics (including shadow).

As discussed above, on the whole, due to the overall reduced scale of development, this alternative would provide a greater decrease in significant environmental impacts, compared to those of the proposed project, although less than that which would occur under the Reduced Development Alternative. As with the Reduced Development Alternative, the Altered Land Use Mix Alternative would not substantially lessen or avoid the significant and unavoidable air quality and climate change impacts of the proposed Transit District DTPP Amendments. In addition, to the extent that the demand for additional developed office space that would otherwise be built pursuant to the proposed project would be met elsewhere in the Bay Area, employees in such development could potentially generate greater impacts on transportation systems (including VMT), air quality, and greenhouse gases than would be the case for development on the more compact and better-served-by-transit project site. This would be particularly likely for development in more outlying parts of the region where fewer services and less transit access is provided. As with the Reduced Development Alternative, it is acknowledged that the Altered Land Use Mix Alternative would incrementally reduce local impacts in and around the project site and in Downtown Redwood City, while potentially increasing regional emissions of criteria air pollutants and greenhouse gases, as well as regional traffic congestion.

The Altered Land Use Mix Alternative would provide 36 percent more housing (+500 units) within the Transit District area than which would occur under the proposed Transit District DTPP Amendments, and consequently would serve to better achieve housing-related project objectives than the proposed Transit District DTPP Amendments and the Reduced Development Alternative. However, the Altered Land Use Mix Alternative would provide for only approximately one-half the new office development (850,000 square feet, or 780,000 square feet under the development cap) within the Transit District area compared to that which would occur under the Transit District DTPP Amendments. As such, this alternative would not fully meet key project objectives for establishing office uses adjacent to the Redwood City Transit Center; responding to market demands for office uses; and maximizing the development potential of the Transit District Area for job opportunities. As a result, the Reduced Development Alternative would not achieve the City's office land use-related objectives for the Project to the same degree as the proposed Transit District DTPP Amendments.

Because the Altered Land Use Mix Alternative would not be expected to substantially reduce or avoid any of the significant effects that are expected from the mitigated Project, and because this alternative would not achieve the City's office development-related objectives for the Project to the same degree as the proposed Transit District DTPP Amendments, the City hereby rejects the Altered Land Use Mix Alternative from further consideration.

Findings Relating to the Reduced Office Alternative

Findings. *The Reduced Office Alternative was added as a revision to the Draft SEIR in response to comments received. The Reduced Office Alternative would reduce the cap on office development in the Transit District to 1.23 million square feet instead of 1.63 million square feet (i.e. about 75 percent of the office space in the proposed Transit District DTPP Amendments). Given that the Reduced Office Alternative would only lower the cap on office uses and would not otherwise affect the proposed housing, the Reduced Office Alternative would have similar impacts as those of the proposed Transit District DTPP Amendments, including the same significant effects as the proposed Transit District DTPP Amendments, albeit to a lesser degree. This alternative would still achieve the City's objectives for the Project, including the office development-related objectives, by providing 1.23 million square feet of office space and the same number of residential units as the proposed Transit District DTPP Amendments.*

Explanation. Under the Reduced Office Alternative, impacts related to the intensity of development—traffic; criteria air pollutants, toxic air contaminants, and greenhouse gas emissions; noise and vibration; population or employment; and demand for public services and utilities—would generally be reduced, compared to those of the proposed Transit District DTPP Amendments.

All transportation impacts of the Reduced Office Alternative would be less than significant, as with the proposed Transit District DTPP Amendments. In fact, the Reduced Office Alternative would result in 16 percent fewer daily vehicle trips and a similar decrease in daily VMT, compared to the proposed Transit District DTPP Amendments. The Reduced Office Alternative would generate incrementally greater VMT per resident but incrementally lesser VMT per employee than would the proposed Transit District DTPP Amendment, although both the residential and office VMT would be below the City's VMT Thresholds, as under the proposed Transit District DTPP Amendments.

Like the proposed Transit District DTPP Amendments, the Reduced Office Alternative would result in a lesser percentage increase in VMT than in service population, and therefore, this alternative would not conflict with or obstruct implementation of the applicable air quality plan, and the Plan-level impact would be less than significant, as with the proposed Transit District DTPP Amendments. However, the Reduced Office Alternative, like the proposed Transit District DTPP Amendments, is conservatively concluded to have a significant unavoidable project and cumulative impact with respect to emissions of criteria air pollutants from individual subsequent development project(s), even with implementation of Mitigation Measures AQ-2a and AQ-2b. The Reduced Office Alternative could result in similar, albeit somewhat lesser, significant health risk impact as would the proposed Transit District DTPP Amendments, and would be similarly reduced to a less-than-significant level with implementation of Mitigation Measure AQ-3. The Reduced Office Alternative would be consistent with the applicable clean air plan and would have a less-than-significant impact, as under the Transit District DTPP Amendments.

The Reduced Office Alternative would result in similar, albeit somewhat lesser, significant climate change impacts as the proposed Transit District DTPP Amendments. However, as with the proposed Transit District DTPP Amendments, these impacts, as well as this alternative's cumulative climate change impacts, would be reduced to a less-than-significant level with Mitigation Measure CC-1. Nevertheless, similar to the Transit District DTPP Amendments, full implementation of Mitigation Measure CC-1 may not be feasible, and, as a result, impacts of the Reduced Office Alternative with respect to climate change are likewise conservatively considered to be significant and unavoidable.

The Reduced Office Alternative would result in similar, albeit somewhat lesser, construction noise and vibration impacts compared to the Transit District DTPP Amendments, and likewise would be mitigated to a less-than-significant level with implementation of Mitigation Measure NO-1 and NO-3, respectively. The Reduced Office Alternative would result in similar, albeit somewhat lesser, building equipment noise impacts as the Transit District DTPP Amendments, and likewise be mitigated to a less-than-significant level with implementation of Mitigation Measure NO-2. Like the proposed Transit District DTPP Amendments, the Reduced Office Alternative would result in less-than-significant traffic noise impacts.

The Reduced Office Alternative, similar to the proposed Transit District DTPP Amendments, would have less-than-significant impacts with respect to population and housing less-than-significant impacts with respect to population and housing because it would not induce substantial unplanned growth and would not result in residential displacement.

The Reduced Office Alternative would result in less-than-significant impacts with respect to public services (police, fire, and emergency medical services; parks and recreational facilities; schools; and libraries), as under the proposed Transit District DTPP Amendments. The Reduced Office Alternative would also have less-than significant impacts with respect to utilities and infrastructure (including water quality; groundwater recharge; storm drainage; flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation; and consistency with a water quality control plan or sustainable groundwater management plan), as under the proposed Transit District DTPP Amendments. Annual water demand would be reduced by approximately 14 percent, compared to that with the proposed Transit District DTPP Amendments. Annual water demand would be approximately 5 percent less than the Altered Land Use Mix Alternative, and about 37 percent greater than with the Reduced Development Alternative.

Effects related to the footprint of subsequent development projects under the Reduced Office Alternative would generally be the same as or similar to those of the proposed Transit District DTPP Amendments although lesser office development would occur within the proposed Transit District area, including related to disturbance of archaeological or tribal cultural resources, potential exposure during construction to subsurface soil or groundwater contamination, potential disturbance of paleontological resources, effects on historical resources, effects on corrosive soils and impacts on biological resources; and would be similarly mitigated to less than significant level with implementation of mitigation. As with the proposed Transit District DTPP Amendments, effects of the Reduced Office Alternative would be less than significant with respect to land use and aesthetics (including shadow).

As discussed above, on the whole, due to the overall reduced scale of development, this alternative would provide a decrease in significant environmental impacts, compared to those of the proposed project, although the decrease would be to a lesser degree than that which would occur under the Reduced Development Alternative. As with the Reduced Development Alternative, the Reduced Office Alternative would not substantially lessen or avoid the significant and unavoidable air quality and climate change impacts of the proposed Transit District DTPP Amendments. In addition, to the extent that the demand for additional developed office space that would otherwise be built pursuant to the proposed project would be met elsewhere in the Bay Area, employees in such development could potentially generate greater impacts on transportation systems (including VMT), air quality, and greenhouse gases than would be the case for development on the more compact and better-served-by-transit project site. This would be particularly likely for development in more outlying parts of the region where fewer services and less transit access is provided. As with the Reduced Development Alternative, it is acknowledged that the Reduced Office Alternative would incrementally reduce

local impacts in and around the project site and in Downtown Redwood City, while potentially increasing regional emissions of criteria air pollutants and greenhouse gases, as well as regional traffic congestion.

The Reduced Office Alternative would provide the same amount of housing within the Transit District area as under the proposed Transit District DTPP Amendments, and consequently would serve to achieve housing-related project objectives similar to the proposed Transit District DTPP Amendments. However, the Reduced Office Alternative would provide for only approximately 75 percent of the new office development within the Transit District area compared to that which would occur under the Transit District DTPP Amendments. Nevertheless, the Reduced Office Alternative would address each of the City's objectives for the proposed project, particularly with respect to housing, as the number of housing units would remain the same as with the project. This alternative would address the City's objectives to a greater degree than would the Reduced Development Alternative or Altered Land Use Mix Alternative. Although this alternative would result in 25 percent less office floor area than would the proposed Transit District DTPP Amendments, the Reduced Office Alternative would nevertheless—like the proposed project—create a new mixed-use sub-area within the DTPP with office, residential, and retail uses, including a Transit District-specific office development cap; allow for redevelopment of the existing Sequoia Station and Transit Center sites; anticipate an expanded and relocated Caltrain station; make circulation improvements; lower parking requirements; require frontage improvements; provide additional design flexibility; and maintain existing DTPP building heights. On balance, therefore, the Reduced Office Alternative would meet the spirit of each of the project objectives. In addition, the reduced Office Alternative may be considered more likely to be constructed than the Reduced Development Alternative or the Altered Land Use Mix Alternative for reasons of economic viability. This is because this alternative would have a greater amount of office floor area and office use generally has a higher marked value, on a per-square-foot-basis, than does multi-family residential, retail, or industrial space.¹ As a result, the Reduced Office Alternative would still achieve the City's office land use-related objectives for the Project, albeit to a lesser extent than the proposed Transit District DTPP Amendments.

The Reduced Office Alternative would not be expected to substantially reduce or avoid any of the significant effects that are expected from the mitigated Project, and would achieve the City's office development-related objectives for the Project to the lesser degree as the proposed Transit District DTPP Amendments, however, this alternative would achieve the same City housing-related objectives as the proposed Transit District DTPP Amendments. When taking into account all factors, on balance, the Reduced Office Alternative is considered the preferred alternative.

VII. Statement of Overriding Considerations

Approval of the Project by the City Council will result in certain *significant and unavoidable impacts of the Project, as discussed above*, notwithstanding all the feasible mitigation measures the City has adopted. The City Council has examined alternatives to the Project that could avoid (i.e., in the case of the No Project Alternative) or reduce the Project's significant and unavoidable effects and determined that adoption and implementation of the Reduced Office Alternative is the most desirable, feasible, and appropriate action.

¹ Economic & Planning Systems, Inc. Redwood City Fiscal Analysis of Land Uses, August 2021. Available at: [https://webapps.redwoodcity.org/files/cd/main/EPS201062_RedwoodCityLandUseFiscal_8.17.21-\(final\)-1.pdf](https://webapps.redwoodcity.org/files/cd/main/EPS201062_RedwoodCityLandUseFiscal_8.17.21-(final)-1.pdf). Accessed October 2, 2022.

Therefore, in accordance with Public Resources Code Section 21081(b) and CEQA Guidelines Section 15093, the City Council makes the following Statement of Overriding Considerations, which reflects its balancing of the Reduced Office Alternative's benefits against its significant and unavoidable effects and states the specific reasons for its decision to approve the Reduced Office Alternative. Substantial evidence supports the various benefits and can be found in the preceding CEQA findings, which are incorporated by reference into this Statement, the FSEIR, and the other documents which make up the record of proceedings. Each of the overriding considerations set forth below constitutes a separate and independent ground for finding that the benefits of the Reduced Office Alternative outweigh its significant adverse environmental effects and is an overriding consideration warranting approval. The City finds that the Reduced Office Alternative (referred to below as the "Transit District CTTP Amendments") will have the following economic, social, technological, and environmental benefits:

- 1. Implementing the Redwood City General Plan goals and policies relating to sustainable growth.** The General Plan contains numerous policies and programs designed and intended to promote sustainable growth and development. The policies and programs related to the downtown area, including the area of the Transit District, are an important component of this plan. The City's vision for the downtown area is described generally at page BE-47, and pages BE-73 to BE-74. The DTPP was a necessary and important step in achieving this vision, by providing specific regulations intended to create a vibrant urban center in the downtown area, consistent with the General Plan vision. Adoption of the Transit District DTPP Amendments would further this vision by establishing a new sub-area within the DTPP focused on transit-oriented development that would serve a new hub of office, residential and retail uses. The Transit District DTPP Amendments include amendments to the General Plan to ensure consistency with the General Plan, including the DTPP.
- 2. Reducing the number of vehicle trips that occur in the City and the number of vehicle miles traveled by residents of the City.** Motor vehicle trips are the biggest source of air pollution and GHG emissions in California. Reducing the number and length of vehicle trips by residents of Redwood City will benefit Redwood City residents, both directly and indirectly, by improving local air quality, alleviating traffic congestion on local streets and roadways, contributing to regional and statewide efforts to reverse or slow global warming, reducing local energy consumption, and contributing to broader efforts to reduce our nation's dependency on foreign oil and petroleum products. The DTPP enabled substantial residential and commercial growth in close proximity to public transit, employment opportunities, entertainment and recreational opportunities, retail and commercial providers, and other necessary services, thereby eliminating and/or shortening the length of a substantial number of vehicle trips in the City. Adoption and implementation of the Transit District DTPP Amendments further increase commercial, residential and retail development within the DTPP adjacent to the Redwood City Transit Center, including Caltrain Station and SamTrans bus depot, and thus, serve to further to minimize automobile travel and VMT, consistent with the City's GHG reduction goals.
- 3. Improving transportation safety and connectivity.** The Transit District DTPP Amendments include pedestrian, bicycle, and transit enhancements to increase safety and to improve connectivity to and from the relocated Transit Center, including an expanded Caltrain Station, and the greater Downtown and surrounding neighborhoods. Among these would be a requirement for protected bike lanes and potential improvements to bus loading along El Camino Real. The Transit District DTPP

Amendments' planned grid street network will allow for safe movement of people and discourage speeding and other hazardous vehicle movements. The Transit District DTPP Amendments' proposed smaller blocks and grid network would be supplemented by enhanced crosswalks and traffic calming measures. The addition of separated bicycle facilities would decrease exposure of bicyclists to vehicles. The conversion of Hamilton Street between Franklin Street and the Caltrain right-of-way to a potential privately owned, publicly accessible open space will allow a safe path-of travel for pedestrians and bicyclists between the Transit District area and Downtown. The Transit District DTPP Amendments would also enable the City to accommodate a four-track station with longer platforms. In addition, grade separations of the railroad and surface streets are needed to increase safety, preserve traffic flow, and accommodate the new hub station. This station would also enable for more convenient and frequent Caltrain service not only for the City but also for the Peninsula as a whole. Lastly, the improvements would support active transportation consistent with RWCmoves, Citywide Transportation Plan, the El Camino Real Corridor Plan, and in-progress Vision Zero strategy.

4. **Compliance with State mandates.** Assembly Bill 32 (AB 32), the Global Warming Solutions Act of 2006, required that GHG emissions be reduced to 1990 levels by 2020. The State has determined that cities must implement land use strategies, such as dense and walkable infill development in more dense, urban areas, as part of their AB 32 strategy. SB 375, the Sustainable Communities and Climate Protection Act of 2008, goes further, requiring dramatic regional reductions in tailpipe emissions from passenger vehicles through transportation, land use, and housing policies—particularly through slowing suburban sprawl and encouraging modes of transportation other than private automobiles. 2016, Senate Bill 32 (SB 32) established a new climate pollution reduction target of 40 percent below 1990 levels by 2030. The DTPP was an important part of Redwood City's obligation to comply with AB 32, as amended by SB 32, and SB 375 by encouraging and facilitating compact and pedestrian-oriented development near new and existing jobs, services, and transit. The Transit District DTPP Amendments would similarly accommodate compact development and pedestrian-oriented improvements in proximity to transit options, in furtherance of compliance with SB 32 and SB 375. Also, state housing laws require cities, even built-out cities like Redwood City, to facilitate a reasonable share of regional growth. By increasing the residential development capacity of the Transit District area for housing opportunities, the Transit District DTPP Amendments are an important part of fulfilling the obligations as put forth in the current state-certified Redwood City Housing Element.
5. **Enhanced economic development.** The DTPP encouraged and facilitated high-quality, context-sensitive development, and thus, helped support economic development. Similarly, future office, residential and retail development that would occur under the Transit District DTPP Amendments will enable patrons to be within easy reach of Downtown shops and restaurants, increasing those businesses potential for success. Increased economic activity within the Transit District area will add value to Downtown historical resources in the Transit District vicinity, increasing the likelihood of adaptive re-use and reducing the odds of neglect; in particular, the Transit District DTPP Amendments would allow for up to 1.23 million square feet of new office space, accounting for approximately 5,340 permanent office jobs. Increased property values and retail sales will also increase revenue for the City of Redwood City, improving its ability to provide public safety and services.

6. **Provision of affordable housing.** The Transit District DTPP Amendments will increase the residential development capacity of the Transit District area, allowing for the development of approximately 1,100 new housing units. This would include a component of affordable housing that will help the City to meet its Regional Housing Needs Allocation (RHNA) requirement as determined by the Association of Bay Area Governments (ABAG) and address critical shortage of affordable housing in San Mateo County and the Bay Area.

Passed and adopted by the Council of the City of Redwood City at a
Joint City Council/Successor Agency Board/Public Financing Authority Meeting
thereof held on the 28th day of November 2022 by the following votes:

AYES:	Aguirre, Espinoza-Garnica, Howard, Martinez Saballos, Reddy and Mayor Hale
NOES:	None
ABSENT:	None
ABSTAINED:	None
RECUSED:	Gee



Giselle Hale
Mayor of the City of Redwood City

Attest:



Pamela Aguilar, CMC
City Clerk of Redwood City

I hereby approve the foregoing resolution this
30th day of November 2022.



Giselle Hale
Mayor of the City of Redwood City