

CITY COUNCIL RESOLUTION NO 16124

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 ENVIRONMENTAL IMPACT REPORT FOR THE REDWOOD CITY GENERAL PLAN AMENDMENTS TO THE HOUSING, PUBLIC SAFETY, BUILT ENVIRONMENT, BUILDING COMMUNITY, AND NATURAL RESOURCES ELEMENTS (SCH NO. 2022100449)

WHEREAS, the California Legislature (Legislature) has found that “California has a housing supply and affordability crisis of historic proportions. The consequences of failing to effectively and aggressively confront this crisis are hurting millions of Californians, robbing future generations of the chance to call California home, stifling economic opportunities for workers and businesses, worsening poverty and homelessness, and undermining the state’s environmental and climate objectives” (Gov. Code Section 65589.5.); and

WHEREAS, the Legislature has further found that “Among the consequences of those actions are discrimination against low-income and minority households, lack of housing to support employment growth, imbalance in jobs and housing, reduced mobility, urban sprawl, excessive commuting, and air quality deterioration” (Gov. Code Section 65589.5.); and

WHEREAS, the Legislature recently adopted the Housing Crisis Act of 2019 (SB 330) which states that “In 2018, California ranked 49th out of the 50 states in housing units per capita... California needs an estimated 180,000 additional homes annually to keep up with population growth, and the Governor has called for 3.5 million new homes to be built over 7 years”; and

WHEREAS, State Housing Element Law (Gov. Code Sections 65580 et seq.) requires that the City Council adopt a housing element for the eight-year period 2023-2031 to accommodate the City of Redwood City’s (City) regional housing need allocation (RHNA) of 4,588 housing units, comprised of 1,115 very-low income units, 643 low-

income units, 789 moderate-income units, and 2,041 above moderate-income units; and

WHEREAS, to comply with State Housing Element Law, the City has prepared Housing Element 2023-2031 (the Housing Element) in compliance with State Housing Element Law and has identified sites that can accommodate housing units meeting the City's RHNA; and

WHEREAS, as provided in Government Code Section 65350 et. seq., adoption of the housing element constitutes a General Plan Amendment; and

WHEREAS, to comply with Government Code Section 65302(g) requiring all local jurisdictions to update their general plan safety element upon each revision of the housing element or local hazard mitigation plan, but not less than once every eight years, the City has prepared an updated General Plan Public Safety Element to address flood and fire hazards and incorporate climate adaptation and resiliency strategies; and

WHEREAS, to comply with Government Code Section 65302(h) requiring all local jurisdictions with identified disadvantaged communities to adopt a general plan environmental justice element or to adopt environmental justice goals, policies, and objectives as integrated into other general plan elements upon the adoption or next revision of two or more elements concurrently on or after January 1, 2018, the City has prepared environmental justice goals, policies, and objectives and integrated them into the General Plan Housing, Public Safety, Built Environment, Building Community, and Natural Resources Elements; and

WHEREAS, the City determined that the general plan amendments to the Housing, Public Safety, Built Environment, Building Community, and Natural Resources Elements (collectively the "Focused General Plan Update") 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, the City determined that the Focused General Plan Update and certain zoning amendments necessitated by the Focused General Plan Update which will be brought for approval at a later date (collectively then “Project”) would require the preparation of an environmental impact report (“EIR”) to assess the environmental impacts that could result from adoption and implementation of the Project; and

WHEREAS, pursuant to CEQA Guidelines section 15082, the City issued a Notice of Preparation (“NOP”) for the EIR 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 October 19, 2022, for a 30-day review period; and

WHEREAS, the City prepared a Draft Environmental Impact Report (“DEIR”; SCH 2022100449) for the Project and circulated it for public comment for 45 days from November 23, 2022, to January 6, 2023, and copies of the DEIR 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 DEIR to the City’s Community Development and Transportation Department; and

WHEREAS, on December 13, 2022, the Planning Commission held a public hearing to receive additional verbal and written comments on the DEIR; and

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

WHEREAS, on January 27, 2023, the City published the Final Environmental Impact Report (FEIR), including the DEIR, public comments, and the City’s response to

comments, and all persons who commented on the DEIR were notified of the availability of the FEIR on the same day, which is at least 10 days before the City Council held a public hearing to consider the Focused General Plan Update; and

WHEREAS, CEQA section 21081.6 requires the City to adopt a MMRP because mitigation is required and the MMRP for the Project has been made available to the public with the FEIR; 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 FEIR, and the City has evaluated the economic, legal, social, technological, and other benefits of the Focused General Plan Update and prepared the SOC included in the “Findings and Statements Required by CEQA” attached hereto as Exhibit A; and

WHEREAS, on January 31, 2023, the Planning Commission held a duly noticed public hearing as required by state law and Redwood City Municipal Code section 18.62, received a presentation from staff describing the Focused General Plan Update and the FEIR, including minor changes to be added via an Errata prior to final City Council FEIR certification; and

WHEREAS, the Planning Commission recommended (6-0) that the City Council adopt the Findings and Statements Required by CEQA set forth in **Exhibit A**, including the Statement of Overriding Considerations, and further recommended adoption of the Mitigation Monitoring and Reporting Program as set forth in the FEIR, and recommended certification of the EIR; and

WHEREAS, on February 13, 2023, the City Council held a duly noticed public hearing as required by state law and Redwood City Municipal Code section 18.62, to review the Focused General Plan Update and FEIR, to certify the FEIR, and adopt the Focused General Plan Update.

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 FEIR (including the Mitigation Monitoring and Reporting Program, all appendices, and any 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 Focused General Plan Update; 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 recommends adoption of the Mitigation Monitoring and Reporting Program as set forth in the FEIR.

SECTION 3. The City Council certifies the FEIR, which is on file in the Office of the City Clerk of the City of Redwood City and incorporated by this reference, based on its independent judgment and analysis and 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 FEIR and is the entity with final decision-making authority with regard to approval of the Focused General Plan Update.

- b. The FEIR has been completed in compliance with CEQA Statutes and Guidelines and applicable provisions of the Redwood City Municipal Code.
- c. The FEIR has been reviewed and considered by the Planning Commission prior to the Council's rendering of any decision regarding the approval of the Focused General Plan Update.
- d. The FEIR reflects the City's independent judgment and has been found by the City to be adequate to support the City's approval of the Focused General Plan Update.
- e. The information added in the FEIR and any Errata does not constitute new significant information requiring recirculation.
- f. Based on the City's review of the FEIR, 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 (g) 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 FEIR.
- 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 FEIR (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. This resolution shall go into effect immediately upon adoption.

* * *

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 13th day of February 2023 by the following votes:

AYES: Aguirre, Eakin, Howard, Martinez Saballos, Sturken,
Espinoza-Garnica and Mayor Gee

NOES: None

ABSENT: None

ABSTAINED: None

RECUSED: None



Jeff Gee
Mayor of the City of Redwood City

Attest:



Pamela Aguilar, CMC
City Clerk of Redwood City

I hereby approve the foregoing resolution this
15th day of February 2023.



Jeff Gee
Mayor of the City of Redwood City

Housing, Built Environment, Public Safety, Building Community, and Natural Resources Elements Update to the Redwood City General Plan

Final Environmental Impact Report

The City of Redwood City

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 an Environmental Impact Report (the “EIR”) for the proposed amendments to the Housing, Built Environment, Public Safety, Building Community, and Natural Resources Elements and specific amendments to the Redwood City Municipal Code and Zoning Code and amendments to the Redwood City Zoning Map (the “Project”), as described further below. The City is the lead agency for the EIR.

To support its certification of the EIR 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 EIR, as described below.

II. Background

The City of Redwood City completed a comprehensive General Plan update in 2010. In response to State statutory requirements to prepare a sixth cycle Housing Element update and changes to General Plan law since 2010, the City proposes to amend five current General Plan elements: Housing, Public Safety, Built Environment, Building Community, and Natural Resources. Because the amendments focus on the periodic updates necessary to satisfy State laws related to General Plan elements as well as associated amendments to the Municipal Code and Zoning Code and Map, these amendments are referred to as a Focused General Plan Update and Focused Zoning Amendments (the “Project”).

The Project includes goals, policies, and programs that will provide City staff and decision-making bodies with a foundation for analyzing and rendering decisions related to the physical development of the Planning Area and the provision of public services therein. The Project is intended to achieve the planning goals set forth in the Housing, Public Safety, Built Environment, Building Community, and Natural Resources Elements over the Project’s planning horizon. These

amendments establish the development potential for various land uses and serve as a policy guide for determining the future physical development and community services within the Planning Area. The Project has been tailored to reflect current vision regarding housing improvements, to address risks from hazards and climate change, and to comply with current State law. A full description of the Project is provided in Chapter 3 of the EIR (*Project Description*).

III. Overview of Environmental Review

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 EIR (the “DEIR”) for the Project to the Office of Planning and Research (OPR) State Clearinghouse and interested agencies and persons on March 4, 2022, and re-released on October 20, 2022, for a 31-day review period. The NOP solicited comments regarding the scope of the DEIR from identified responsible and trustee agencies, as well as interested parties.

The DEIR was published by the City and available for review for a 45-day comment period from November 23, 2022 to January 6, 2023. During the comment period, the interested public and responsible and trustee agencies were invited to submit comments on the DEIR to the City’s Community Development and Transportation Department. A public hearing on the DEIR was held by the Planning Commission on December 13, 2022; no public written or oral comments were made at the hearing. The DEIR is available on the City’s website dedicated to the Housing Element Update (www.welcomerwc.org/) 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 DEIR and prepared a Final Environmental Impact Report (the “FEIR”). The FEIR, which incorporates by reference the DEIR, includes all comments received during the public review period, responses to those comments, and describes any changes to the DEIR that resulted from the comments received. All persons who commented on the DEIR have been notified of the availability of the FEIR and the date of the public hearing on the Project before the City Council, and all responses to comments submitted on the DEIR 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 FEIR.

The EIR, which is the subject of these Findings and presented for City Council certification, consists of the DEIR, the FEIR, 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 Project’s Program Final EIR Adoption of a Mitigation Monitoring and Reporting Program Adoption of the proposed General Plan Amendments, including map and text amendments

	Adoption of proposed Zoning Code and Municipal Code text changes, and Zoning Map changes
City/County Association of Governments	Determination of consistency with the County Airport Land Use Compatibility Plan (ALUCP) for San Carlos Airport

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

IV. Environmental Review Process 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 Draft EIR for the *Housing, Built Environment, Public Safety, Building Community, and Natural Resources Elements Update to the Redwood City General Plan* (State Clearinghouse No. 2022100449), dated November 2022 and published and circulated for public review and comment by the City from November 23, 2022, through January 6, 2023 (the DEIR), and the Final EIR for the *Housing, Built Environment, Public Safety, Building Community, and Natural Resources Elements Update to the Redwood City General Plan* published and made available for public review on January 27, 2023 (the FEIR), 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 DEIR and the FEIR, 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 DEIR and FEIR, 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, 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 DEIR, the FEIR, 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 City Hall, 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 EIR

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

- The City exercised its independent judgment in accordance with Public Resources Code Section 21082.1(c) in retaining the independent consulting firm MIG, Inc. (MIG) to prepare the EIR, and MIG prepared the EIR under the supervision and at the direction of the City's Community Development and Transportation Director, and the EIR reflects the City's independent judgment and analysis.
- The City circulated the DEIR 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 EIR 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 EIR 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 EIR and approve the Project.
- The EIR 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 EIR and proposed Project.
- The EIR 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 EIR, 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 6 of the DEIR, as incorporated into the FEIR. The City Council concurs with the conclusions in the DEIR, as incorporated into the FEIR, 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 AIR-1 related to conflicts with or obstruction of implementation of the applicable air quality plan; Impact AIR-2 related to a cumulatively considerable net increase of criteria pollutants for which the project region is non-attainment under an applicable federal or state ambient air quality standard; Impact AIR-3 related to exposure of sensitive receptors to substantial pollutant concentrations; Impact AIR-5

related to substantial adverse cumulative impacts with respect to Air Quality; Impact TR-2 related to conflicts or inconsistency with CEQA Guidelines section 15064.3(b) (Project Generated VMT); and Impact UTIL-6 related to causing substantial adverse cumulative impacts with respect to utilities and service systems. Each of the aforementioned impacts would remain significant and unavoidable even after implementing all feasible mitigation measures. By these Findings, the City Council ratifies and adopts the EIR's conclusions for all of the following potential environmental impacts, based on the analyses on the referenced pages of the DEIR.

A. Findings Regarding Less than Significant Impacts

The following potential environmental impacts of the Project were determined to be less than significant and to not require any mitigation measures, as set forth in Chapters 4.1 through 4.20 of the DEIR, as incorporated into the FEIR. The City Council concurs with the conclusions in the DEIR, as incorporated into the FEIR, and makes the following findings with respect to such less than significant impacts.

4.1. Aesthetics

Impact AES-1: Implementation of the proposed Project would not have a substantial adverse effect on a scenic vista.

Implementation of the proposed Project would not result in the substantial degradation in the quality, or obstruction of, scenic views available from a recognized scenic vista. The four most notable viewpoints for these scenic vistas are located in the elevated western hillsides, including the Easter Cross, Easter Bowl, Canada College and Edgewood County Park, where views of the Bay and the Santa Cruz Mountains are largely unobscured and are not expected to be affected by the Project. Implementation of the Project would result in housing development on inventory sites within the City, most of which are in areas that currently include urban development. New development associated with the Project could result in taller and more dense development than currently exists at certain locations; however, this new development would be consistent with the existing urban character of the City. Furthermore, existing architectural review procedures adopted by the City allow the City to evaluate development against the adopted General Plan in order to minimize visual and environmental impacts caused by new development and associated utilities. This impact would be less than significant. (Draft EIR, pp. 4.1-8 to 4.1-9.)

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

The proposed Project would not damage scenic resources as there are no officially designated scenic highways or highway segments that are eligible for designation as scenic within the City of Redwood City, and there would be no direct impact on scenic highways in San Mateo County. The proposed housing sites associated with the Project are primarily clustered in the eastern portion of the Planning Area, while the closest scenic highway (I-280) is located west of the City. This impact would be less than significant. (Draft EIR, p. 4.1-9)

Impact AES-3: Implementation of the proposed Project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings.

The proposed Project would not substantially degrade the existing visual character or quality of public views as individual projects within the Planning Area would be subject to the City's underlying zoning, development, and architectural standards and would predominantly result in in-fill development in locations where similar existing uses occur. The infill nature of development and existing architectural standards will limit visual change while preserving the characteristics of the neighborhoods in which the projects will be located. Potential development sites are generally focused in the eastern portion of the Planning Area and higher density development, typically consisting of larger buildings with more mass, are focused away from the southern and western hillside areas from which viewpoints of important scenic resources are provided. Future development would comply with the General Plan's adopted goal, policies, and implementation programs intended to preserve scenic beauty and maintain community aesthetics. This impact would be less than significant. (Draft EIR, pp. 4.1-9 to 4.1-10)

Impact AES-4: Implementation of the proposed Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

The proposed Project would not substantially increase the number of lighting sources currently within the Planning Area as the Planning Area is already developed and existing lighting is typical for urbanized areas during nighttime hours. With respect to glare, while future, individual development project components would include windows and other glass features and may include exterior metallic elements and trims, these elements would be consistent with existing development in the Planning Area with implementation of the City's architectural review process. Lighting and building materials and designs for future development would be subject to review and approval by the City prior to approving building permits to ensure that new sources of lighting are compatible with design objectives, performance standards, and code requirements. This impact would be less than significant. (Draft EIR, pp. 4.1-10 to 4.1-11)

Impact AES-5: Implementation of the proposed Project would not result in deviation from the Downtown Precise Plan (DTPP) building height, setback and stepback regulations designed to minimize shadow impacts (particularly on public parks, plazas and open areas in the downtown), to preserve access to natural light and air, and preserve historic character within the DTPP area.

The proposed Project would not substantially impact access to natural light and air or impact historic character within the DTPP area. Future development under the Project occurring within the DTPP area would be required to comply with DTPP standards and regulations, including preparation of site-specific shadow simulations, which would ensure that impacts on light-sensitive uses and spaces, such as shadow-sensitive Downtown public open space areas or solar sensitive portions of residential parcels outside but adjacent to the DTPP area, would not be substantially adversely affected by new development. This impact would be less than significant. (Draft EIR, p. 4.1-11)

4.2. Agriculture and Forestry Resources**Impact AG-1: Implementation of the proposed Project would not result in conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as**

shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use.

The proposed Project would not result in Farmland conversion to nonagricultural use. The Planning Area is a developed area with urban and suburban uses. According to the DOC's Important Farmland Finder, the entire Planning Area is designated as "Urban and Built Up" and there is no land in the Planning Area considered Prime Farmland, Farmland of Statewide Importance, or Unique Farmlands. Therefore, there is no impact. (Draft EIR, p. 4.2-3)

Impact AG-2: Implementation of the proposed Project would not conflict with existing zoning for agricultural use, or a Williamson Act contract.

The proposed Project would not conflict with existing agricultural zoning or a Williamson Act contract. There are no areas within the Planning Area zoned for agricultural use and there are no Williamson Act contracts within the Planning Area. Therefore, there is no impact. (Draft EIR, p. 4.2-3)

Impact AG-3: Implementation of the proposed Project would not conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)).

The proposed Project would not conflict with existing forest land or timberland zoning. There are no areas identified as timberland zoned Timberland Production within the Planning Area. The proposed Project would not allow for any development of forest land, timberland, or timberland zoned Timberland Production that is not already allowed under the existing General Plan. Additionally, the Housing Element Update does not identify any Opportunity Site in areas within the City that could meet the definition of forest land. The Project would not change the zoning of the open space or forest lands in the City which is currently designated for open space. Therefore, there is no impact. (Draft EIR, pp. 4.2-3 to 4.2-4)

Impact AG-4: Implementation of the proposed Project would not result in the loss of forest land or conversion of forest land to non-forest use.

The proposed Project would not allow for any development in forest land that is not already allowed under the existing General Plan. Additionally, the Housing Element Update does not identify any Opportunity Site in areas within the City that could meet the definition of forest land. The Project would not change the zoning of the open space or forest lands in the City which is currently designated for open space. Therefore, there is no impact. (Draft EIR, p. 4.2-4)

Impact AG-5: Implementation of the proposed Project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or conversion of forest land to non-forest use.

As discussed in the findings for Impacts AG-1 through AG-4, the proposed Project would not result in conversion of Farmland to nonagricultural use or conversion of forest land to non-forest use. Therefore, there is no impact. (Draft EIR, p. 4.2-5)

4.3. Air Quality

Impact AIR-4: Implementation of the proposed Project would not result in emissions leading to odors adversely affecting a substantial number of people.

The proposed Project would not, in and of itself, permit or authorize any new, major sources of potential odors (e.g., agricultural operations, wastewater treatment plants, landfills, and certain industrial operations) and there are no such active sources in or near the Planning Area. Construction occurring within the Planning Area could produce odors from fuel combustion or solvents/paints used but these odors would be temporary, quickly disperse, and would not affect a substantial number of people. Under the Cumulative (2040) Plus Project growth projection, the Project would increase the amount of residential development in the City, including multi-family development that could be located close to retail, restaurant, and other commercial land uses that may generate localized sources of odors that may or may not be objectionable to nearby residential land uses. This impact would be less than significant with standard environmental review practice. (Draft EIR, pp. 4.3-25 to 4.3-26)

4.4. Biological Resources

Impact BIO-5: The proposed Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

The proposed Project would not result in an impact related to potential conflict with local policies or ordinances because all housing development would be required to be consistent with the Housing Element and all Safety Element projects that could impact sensitive biological resources would be subject to environmental review, including review for consistency with applicable policies and programs of the General Plan. Implementation of the proposed Project components that would be constructed by the City or other project proponents would be required to design those projects in a manner that is consistent with the relevant General Plan's policies, implementation programs, and ordinances. Additionally, the project proponents would have to comply with the City's Street Tree Ordinance and Tree Preservation Ordinance, which requires a permit for removal of protected trees and has standards for protecting retained trees during construction. The City would also comply with the provisions of these ordinances if any trees are planned to be removed during implantation of Housing and Safety Elements activities. Therefore, there is no impact. (Draft EIR, p. 4.4-48)

Impact BIO-6: The proposed Project 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.

The proposed Project would not result in any conflicts with an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan because there are no adopted Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or state habitat conservation plans within or that affect the Planning Area. Therefore, there is no impact. (Draft EIR, pp. 4.4-48 to 4.4-49)

4.5. Cultural Resources

Impact CUL-1: The proposed Project would not cause a substantial adverse change in the significance of a historic resource pursuant to Section 15064.5.

The proposed Project would not cause a substantial adverse change in because future development associated with implementation of the proposed Project would be required to comply with current standards for development and policies within the General Plan that support the preservation or rehabilitation/restoration of identified historic resources and provide for the protection of such resources. Additionally, as site-specific developments are proposed, individual projects within the Planning Area would be required to undergo project-specific environmental review. If project-level significant impacts to historic resources are identified, project-site specific mitigation would be applied as part of this separate environmental review to reduce potentially significant impacts related to historic resources, as required under CEQA. Implementation of adopted General Plan goals and policies, site-specific environmental review, as well as the existing preservation guidelines in the City's Municipal Code, would ensure potential impacts to historic resources would be less than significant. (Draft EIR, pp. 4.5-12 to 4.5-13)

4.6. Energy

Impact Energy-1: The proposed Project would generate energy usage, either directly or indirectly, that may have a significant impact on the environment.

Energy consumption related to proposed Project operations would include transportation energy demands and facilities energy demands (energy consumed by building operations and site maintenance activities). The City of Redwood City is an urbanized area, and the proposed Project would increase residential density in areas with existing transit stops. The proposed Project does not propose uses or operations that would inherently result in excessive and wasteful vehicle trips and VMT nor associated excess and wasteful vehicle energy consumption. Therefore, as fuel consumption would be reduced from the implementation of the Project, fuel consumption would be insignificant in comparison to the State's demand. Therefore, Project transportation energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary. Building operation and site maintenance (including landscape maintenance) from future projects associated with the Project would result in the consumption of electricity and natural gas (provided by PG&E). Operation of the proposed Project would involve the use of energy for heating, cooling and equipment operation. However, these facilities would comply with all applicable California Energy Efficiency Standards and current CALGreen Standards. The proposed Project would result in a reduction in energy usage per capita and therefore this impact would be less than significant. (Draft EIR, pp. 4.6-13 to 4.6-15)

Impact Energy-2: The proposed Project would not conflict with an applicable plan, policy, or regulation adopted for the purposes of reducing the emissions of greenhouse gases.

The proposed Project would not conflict with federal transportation regulations because the City of Redwood City is located in an already developed area with existing roads. The City is not planning for intermodal facilities in the Planning Area, and therefore the proposed Project would not interfere with or otherwise obstruct intermodal transportation plans or projects that may be proposed pursuant to the ISTEA. All future projects within the Planning Area are required to comply with the California Green Building Standard Code requirements for energy efficient buildings and appliances, as well as utility energy efficiency programs implemented by PG&E, and therefore the proposed Project would not conflict with the State's Energy Plan and Title 24 CCR energy efficiency standards. In addition, all future housing will be required to comply with the City's REACH Codes, which require projects to be fully electric with limited exceptions. Finally,

all future projects would be required to show compliance with all federal, state, and local energy regulations. Therefore, this impact would be less than significant. (Draft EIR, pp. 4.6-16 to 4.6-17)

4.7. Geology and Soils

Impact GEO-1: The proposed Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault; ii) Strong seismic ground shaking; iii) Seismic-related ground failure, including liquefaction; or iv) landslides.

All new development facilitated by the Project would be designed consistently with a site specific, design level geotechnical report, which would be fully compliant with the seismic recommendations of a California-registered professional geotechnical engineer. These recommendations would be designed to adequately prepare for the foreseeable geologic and soils disturbances identified in the Draft EIR (see Draft EIR pp. 4.7-1 through 4.7-7 and 4.7-12 to 4.7-13). In addition, the City has implemented development standards that further mitigate potential impacts related to soil and geological phenomenon, namely: earthquake related events, seismic ground shaking, liquefaction, and landslides that have the potential to create risk of loss, injury or death. Implementation of the policies of the updated Safety Element, and maintaining consistency with the State Building Code and the current guidelines for development in the municipal code, would ensure that potential impacts related to geologic and seismic constraints on future development within the Planning Area would be less than significant. (Draft EIR, pp. 4.7-12 to 4.7-13)

Impact GEO-2: The proposed Project would not result in substantial soil erosion or the loss of topsoil.

The proposed Project and future development facilitated by it would not pose a threat to soil erosion or loss of topsoil beyond what would normally be expected to occur with any typical potential development because future development facilitated by the Project must (1) meet the requirements of the National Pollution Discharge Elimination System (NPDES), which includes standards for short-term construction related water quality impacts and implementation of Best Management Practices (BMPs) with a monitoring program; (2) prepare, as applicable, a Storm Water Pollution Prevention Plan (SWPPP); and (3) comply with City development standards as identified in Municipal Code Chapter 30, Article V, Section 30.90 - Grading, Erosion and Sedimentation Control Plans. (Draft EIR, pp. 4.7-13 to 4.7-15)

Impact GEO-3: The proposed Project 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 offsite landslide, lateral spreading, subsidence, liquefaction or collapse.

Due to the presence of local and regional faults, sandy soils, and shallow groundwater, portions of the Planning Area may experience subsidence, lateral spreading, or collapse during strong seismic events, in addition to the potential for liquefaction or landslides. These seismic-related conditions could affect structures and their occupants of future development facilitated by the Project, however, the State Building Code (SBC) includes standards for building design and

construction based on seismic constraints and expected ground-shaking throughout California. Part Two of Title 24 of the SBC includes specific performance standards for safety in regard to soil disturbance and geologic events. During the City's mandatory development review process, proposed private projects would be evaluated against the seismic design standards of the SBC and General Plan Policies PS-6.1 and PS-6.3, which address identifying and reducing the risk of geologic and seismic events. Implementation of Public Safety Element policies and the State Building Code would ensure that potential impacts related to seismically induced constraints on future development within the Planning Area would be reduced to less than significant. (Draft EIR, pp. 4.7-15 to 4.7-16)

Impact GEO-4: The proposed Project would not be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.

The Planning Area contains a number of soil types including those characterized as deep clays and silty clays. In areas where soils have a high clay content, the potential exists for expansion when the soil becomes saturated with water. This type of soil constraint could affect structures and their occupants of future development facilitated by Project. However, implementation of General Plan goals and policies and the State Building Code would ensure that potential impacts related to soil constraints, including expansive soils, would be less than significant. (Draft EIR, pp. 4.7-16 to 4.7-17)

Impact GEO-5: The proposed Project would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.

The entire Planning Area is served by the sewage system infrastructure; there are no septic systems in the Planning Area. The Planning Area is largely urbanized, and the potential housing sites are located where sewage infrastructure is already available. Therefore, potential impacts related to soil constraints of future development facilitated by Project would be less than significant due to the Planning Area being fully serviced by the existing sewage infrastructure. (Draft EIR, p. 4.7-17)

Impact GEO-6: The proposed Project not directly or indirectly destroy a unique paleontological resource or site or unique geological feature.

The Planning Area is not known to have paleontological resources but could potentially have resources that date back hundreds of thousands of years. However, the Planning Area may contain isolated geologic features in some of the steeper, less accessible areas. The City's Cultural Resources Management Plan requires development proposals to obtain a records search at the Northwest Information Center of the California Archaeological Inventory; interview of persons knowledgeable about the history of the site, as approved by City staff and within a time period designated by staff; and a review of maps archived at the local history room of the Main Library. As a standard condition of approval on all ground disturbing activities in the City's jurisdiction, the City Community Development and Transportation Department requires work stoppage in the event paleontological resources are identified.

In addition, individual development project proposals are assessed by the City Community Development and Transportation Department, in coordination with a qualified paleontologist, prior to the issuance of grading or demolition permits, for the potential to destroy unique paleontological resources. The Department also requires development proposals entailing significant earthworks or deep foundations with the potential to penetrate sedimentary rock layers to incorporate a study by a professional paleontologist to assess the potential for damage of paleontological resources, with the paleontologist providing detailed provisions for the protection of these resources to the City Community Development and Transportation Department. The continued implementation of the City's established processes under the Cultural Resources Management Plan regarding potential paleontological resources or unique geologic resources would ensure that potential impacts related to paleontological resources of future development facilitated by Project would be less than significant. (Draft EIR, pp. 4.7-17 to 4.7-18)

4.8. Greenhouse Gases

Impact GHG-1: The proposed Project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.

Project implementation would result in construction and operational activities that would generate GHG emissions, however, as indicated in Draft EIR Table 4.8-4 (Draft EIR p. 4.8-18), the Cumulative (2040) Plus Project growth projection would result in GHG emissions that would not exceed the BAAQMD plan-level significance threshold. Therefore, GHG emissions generated by the growth facilitated by the Project would not exceed BAAQMD thresholds, and this impact would be less than significant. (Draft EIR, pp. 4.8-16 to 4.8-19)

Impact GHG-2: The proposed Project would not conflict with an applicable plan, policy, or regulation adopted for the purposes of reducing the emissions of greenhouse gases.

The 2017 Climate Change Scoping Plan is CARB's primary document used to ensure State GHG reduction goals are met. Nearly all of the specific measures identified in the 2017 Climate Change Scoping Plan would be implemented at the state level, with CARB and/or another state or regional agency having the primary responsibility for achieving required GHG reductions. Therefore, the Project would have limited ability to directly conflict with any of the specific measures identified in the 2017 Climate Change Scoping Plan. Nonetheless, the 2017 Climate Change Scoping Plan recommends a statewide efficiency metric of six metric tons per capita by 2030 and two metric tons per capita by 2050, based on the statewide GHG emissions inventory that includes all emissions sectors in the State. As indicated in Draft EIR Table 4.8-4 (Draft EIR p. 4.8-18), implementation of the proposed Project is estimated to result in a GHG emission efficiency of 3.9 MTCO₂e per capita, and therefore growth facilitated by the proposed Project would result in emissions that meet the 2017 Climate Change Scoping Plan adjusted statewide 2040 metric of four MTCO₂e per capita employed for this EIR. This impact would be less than significant. (Draft EIR, pp. 4.8-19 to 4.8-20)

4.9. Hazards and Hazardous Materials

Impact HAZMAT-1: The proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

Construction of future development facilitated by the Project would likely involve the use and disposal of chemical agents, solvents, paints, and other hazardous materials associated with construction activities, however, the amount of these chemicals present during construction would be limited, would be used and disposed in compliance with existing government regulations, and would not be considered a significant hazard. Typical best management practices (BMPs) to control hazardous materials during construction include proper labeling and storage, removal of materials once completed, and offsite vehicle maintenance. In addition, residential and mixed-use housing development do not cause or contribute substantially to potential hazards to the public or the environment because these uses do not involve the use, transport, or disposal of appreciable amounts of hazardous materials or wastes. The City requires all new development to follow applicable regulations and guidelines regarding the storage, handling and disposal of hazardous waste. In addition, all hazardous materials are required to be stored and handled according to manufacturer's directions and local, state, and federal law. Therefore, given the extensive existing federal, State, and local hazardous materials regulations already in place, the proposed Project would not create a significant hazard to the public or the environment from hazardous materials transport, storage, use, and disposal. This impact would be less than significant. (Draft EIR, pp. 4.9-19 to 4.9-20)

Impact HAZMAT-2: The proposed Project 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.

Residential and mixed-use housing development do not cause or contribute substantially to potential hazards to the public or the environment because these uses do not involve the use, transport, or disposal of appreciable amounts of hazardous materials or wastes. The potential for soil contamination for any proposed new development would be addressed through compliance with local, State, and federal regulations and laws pertaining to hazardous materials contamination and the continued application of existing General Plan Public Safety Element goals, policies, and implementation programs, as explained in detail in the Draft EIR (Draft EIR pp. 4.9-16 to 4.9-17). The Bay Area Air Quality Management District (BAAQMD) regulates the demolition and renovation of buildings and structures that may contain asbestos, and the manufacture of materials known to contain asbestos. Existing General Plan Public Safety Element Program PS-57 ensures development under the proposed Project complies with BAAQMD Asbestos Airborne Toxic Control Measure (CCR, Title 17, §93105) and avoids or minimizes potential impacts associated with accidental release of asbestos from demolition activities.

Each development project facilitated by the Project would be required to comply with all applicable, existing local, State, and federal-mandated site assessment, remediation, removal, and disposal requirements for soil, surface water, and/or groundwater contamination, as described in detail in the Draft EIR (Draft EIR pp. 4.9-7 to 4.9-17). Therefore, with continued adherence to the requirements of the General Plan Public Safety Element and compliance with established local, State, and federal environmental site assessment procedures, potential impacts related to upset and accident conditions involving the release of hazardous materials into the environment from facilitated by the Project would be less than significant. (Draft EIR, pp. 4.9-20 to 4.9-21)

Impact HAZMAT-3: The proposed Project 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.

New development facilitated by the Project is not expected to generate hazardous emission or involve the handling of hazardous or acutely hazardous materials, substances, or waste, even if located within one-quarter mile of existing or proposed schools. Hazardous materials associated with construction of new uses would include vehicle fuels, paints, solvents, insulation and caulking materials, etc. Hazardous materials associated with the operation of new residential and commercial uses could include, for example, liquid chemical products (e.g., household cleaners), used motor oil, building maintenance supplies, paints and solvents, and pesticides. However, the limited quantity of such products would not generate significant hazardous air emissions or involve the use of acutely hazardous materials that could pose a significant threat to the environment or human health.

In addition, because use of these chemicals would require compliance with applicable local, State, and federal government regulations, as described in detail in the Draft EIR (Draft EIR pp. 4.9-7 to 4.9-17), they would not be considered a significant hazard. Specific to schools, State regulations on the siting of hazardous materials facilities limit their location in proximity to schools; conversely, CEQA (section 21151.8, School Site Acquisition or Construction) and other State regulations impose restrictions on where new schools can be constructed. In addition, individual discretionary development applications would be required by the City to undergo a project-specific CEQA review, which would include an evaluation of a project's potential impacts on any nearby schools. Therefore, this impact would be less than significant. (Draft EIR, pp. 4.9-21 to 4.9-22)

Impact HAZMAT-4: The proposed Project would not be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment.

There are several known “open case” contamination sites within the Planning Area that previously contained contamination requiring remediation. As discussed in the Draft EIR (Draft EIR pp. 4.9-1 to 4.9-2), according to CalEPA, DTSC and SWRCB, there are four Cortese Sites, as defined in Government Code Section 65962.5, listed in the City of Redwood City. At this time, there are no known sites on the Cortese list that would be housing sites under the proposed Project. Future development facilitated by the Project will be required to comply with applicable federal, State, and local laws and regulations regarding hazardous materials depending on the type of use and materials to be used. In addition, future development would investigate this possibility as part of the project-specific CEQA review process. If future redevelopment is proposed on any of these contamination sites, potential contamination (if not already remediated) would be addressed through the City's development review requirements in accordance with the General Plan Public Safety Element policies and implementation programs and in compliance with applicable State and federal regulations, including Environmental Site Assessment (ESA) procedures. Therefore, this impact is considered less than significant. (Draft EIR, pp. 4.9-22 to 4.9-23)

Impact HAZMAT-5: The proposed Project would not result in a safety hazard or excessive noise for people residing or working within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport.

The western portion of the Planning Area is located within the Airport Influence Area (AIA) for San Carlos Airport, and development facilitated by the Project located within the AIA would require review for consistency with the City/County Association of Governments of San Mateo County (C/CAG) (the Airport Land Use Commission for San Mateo County) adopted the Comprehensive Airport Land Use Compatibility for the Environs of San Carlos Airport (ALUCP).

In addition, Federal Aviation Administration (FAA) review is required of proposed structures exceeding Federal Aviation Regulation elevations, and development facilitated by the Project in the Planning Area would be subject to compliance with FAA notification requirements to identify potential aeronautical hazards in advance and prevent or minimize potential adverse impacts to the safe and efficient use of navigable airspace. Because potential airport safety hazards and noise concerns associated with future development proposed in the AIA or within the area subject to FAA notification requirements would be addressed through standard City development review processes, including as applicable consistency review with the ALUCP and/or review by the FAA, compliance with these regulatory standards would ensure that the Project would not result in a safety hazard or excessive noise for people residing or working in the Project area. Therefore, this impact is considered less than significant. (Draft EIR, pp. 4.9-23 to 4.9-24)

Impact HAZMAT-6: The proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

All major public streets in Redwood City serve as principal evacuation routes and would support an evacuation function; however, in any evacuation, the exact emergency routes used would depend on a number of variables, including the type, scope, and location of the incident. As specific future individual development projects are proposed within the Planning Area, potential construction period emergency access impacts would be evaluated and avoided as part of the regular project review and/or the CEQA compliance process. While an increase in population in the Planning Area could increase evacuation times, the policies and implementation programs proposed in the updated Public Safety Element would ensure adequate emergency response and evacuation procedures are planned for and maintained on a development-by-development basis and Planning Area-wide. Therefore, the proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and this impact is considered less than significant. (Draft EIR, pp. 4.9-25 to 4.9-26)

Impact HAZMAT-7: The proposed Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

The foothill neighborhoods west of Alameda de las Pulgas are designated a Very High Fire Hazard Severity Zone (VHFSZ), and development proposed within this zone would be subject to the City or County defensible space and fuel modification requirements. New construction within the VHFSZ is also required to comply with California Building Code Chapter 7A, including requirements for fire retardant or ignition resistant construction materials at roofs, eaves, vents, exterior walls, exterior windows and doors, decks, and areas below decks. In addition, California Government Code §51182 requires buildings within these areas to provide and maintain defensible space up to 100 feet (or the property line, whichever is less) from the building. The Redwood City Building Code requires fire retardant roofing (§905.1.3) and fire sprinklers (§903.2). Continued implementation of City Municipal Code requirements related to fire protection and the implementation of the proposed policies and implementation programs of the updated Public Safety Element would ensure that the proposed Project would not result in exposure of people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. Therefore, this impact would be less than significant. (Draft EIR, pp. 4.9-26 to 4.9-27)

4.10. Hydrology and Water Quality

Impact HYD-1: The proposed Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.

The City's existing development review process evaluates proposed private projects against water quality and permitting requirements of the affected federal, state, and regional agencies such as the San Francisco Bay Region National Pollution Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Permit and the San Mateo Countywide Water Pollution Prevention Program (SMCWPPP), which address water quality, waste discharge, or stormwater requirements by requiring jurisdictions to reduce discharge of polluted runoff. Continued implementation of adopted General Plan goals, policies and programs, and the City's development review process, would ensure that potential impacts on local and regional water quality from future development facilitated by the Project would be reduced to less than significant levels. Therefore, the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality, and this impact would be less than significant. (Draft EIR, pp. 4.10-17 to 4.10-18)

Impact HYD-2: The proposed Project 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 City has not historically used groundwater as a potable water source, and groundwater is not currently used as a municipal source of water in the Planning Area, although the City is currently evaluating groundwater as a potential future emergency or back-up supply source. However, much of the development associated with implementation of the Project is anticipated to result in minimal increases in new impervious areas that would not be expected to interfere substantially with groundwater recharge. Therefore, because the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin, this impact would be considered less than significant. (Draft EIR, pp. 4.10-18 to 4.10-19)

Impact HYD-3: The proposed Project 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 offsite; (iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

Implementation of the Project would generally continue existing development trends and patterns, which include an overall urban and suburban development pattern, and would not be expected to significantly change that pattern. In addition, the system of drainage and flood control channels would likely remain similar to existing conditions. Changes to site-specific drainage conditions would be evaluated in the CEQA and planning review processes to determine the most appropriate way to accommodate existing drainages. Future development facilitated by the Project would be required to be consistent with federal, state, and local regulations regarding drainage channel design and operation, runoff retention, and stormwater treatment. Continued

implementation of these goals, policies, and implementation measures and the City's development review process would ensure impacts to drainage patterns related to erosion and siltation from future development facilitated by the Project would be less than significant. City design standards for development are intended to result in no increase in offsite downstream runoff, typically achieved through runoff retention or detention onsite and/or low impact development/stormwater treatment features, which would ensure that the Project would have less than significant impacts related to increases in runoff. Therefore, impacts of future development facilitated by the Project on the existing drainage pattern of the Planning Area and related erosion or siltation, rate or amount of surface runoff, and polluted runoff would be less than significant. (Draft EIR, pp. 4.10-19 to 4.10-21)

Impact HYD-4: The proposed Project would not result in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.

Portions of the Planning Area are mapped as Special Flood Hazard Area (SFHA), including 100-year floodplains in Downtown Redwood City along and extending north and south from Highway 101 and in Redwood Shores in the northern portion of the Planning Area and a sizeable portion of the Planning Area mapped as flood hazard zones with 0.2% annual chance of inundation (500-year floodplains). The General Plan contains goals, policies, and programs intended to reduce flooding risks, and the City's Municipal Code (Floodplain Management) includes methods and provisions intended to minimize public and private losses due to flood conditions. Continued implementation of adopted goals, policies, and implementation programs; compliance with the provisions of Chapter 41 of the Municipal Code; and implementation of the sea level rise-related policies and implementation measures included in the Project would minimize the impact of flooding hazards on existing and new development and result in a less than significant impact related to release of pollutants within the Planning Area due to flooding.

A small portion of the Planning Area, including Bair Island, Greco Island, Maple Street, and the business centers off of Seaport Boulevard, is located within a Tsunami Hazard Area. These areas would be protected due to the extensive existing levee system and intervening natural features, such as wetlands, located along the Bay shoreline. Therefore, the likelihood of the Planning Area being inundated by a tsunami is low. This impact would be less than significant.

Due to the Planning Area's proximity to the San Francisco Bay, lands immediately adjacent to the San Francisco Bay, such as Bair, Bird, and Greco Islands, are at a higher risk of seiche. However, due to the distance from the San Francisco Bay shoreline and the buffer effect provided by islands, the severity of the seiche energy should be decreased upon reaching the developed portions of the Planning Area in the Bayfront area, representing a less than significant impact in regards to seiche inundation. In addition, implementation of adopted General Plan policies and implementation programs, adherence to the CBC, would minimize effects related to seiche on development facilitated by the Project.

Therefore, based on the relatively low risk to the Planning Area of flooding, tsunami, and seiche, there is little potential for significant release of pollutants from these sources. This impact would be less than significant. (Draft EIR, pp. 4.10-21 to 4.10-23)

Impact HYD-5: The proposed Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

The San Francisco Bay Basin Water Quality Control Plan (Basin Plan) is the water quality control plan for the San Francisco Bay Region, including the Planning Area, and it designates beneficial uses, establishes water quality objectives, and contains implementation programs and policies to achieve those objectives for all waters addressed through the Basin Plan. The Basin Plan is continually being updated to include amendments related to implementation of the TMDL of specific potential pollutants or water quality stressors, revisions of programs and policies within the San Francisco Bay RWQCB region, and changes to beneficial use designations and associated water quality objectives.

The General Plan requires future development within the Planning Area to be consistent with NPDES permit requirements, and because the Basin Plan is the master water quality control planning document for the RWQCB, the Project would therefore not conflict with or obstruct implementation of a water quality control plan. In addition, the City overlies the southern end of the San Mateo Plain Subbasin of the Santa Clara Valley Basin, however, the subbasin is not adjudicated, and DWR has not determined that the subbasin is in a condition of overdraft. The subbasin is identified as a “very low priority” basin by DWR, and therefore not subject to the requirements of SGMA. The Project would not conflict with or obstruct implementation of a sustainable groundwater management plan, and this impact would be less than significant. (Draft EIR, pp. 4.10-23 to 4.10-24)

4.11. Land Use and Planning

Impact LAND-1: The proposed Project would not physically divide an established community.

The proposed Project does not include major circulation or infrastructure changes that would restrict access to any particular areas of the City or otherwise would include policies that would limit or preclude access between adjacent areas or neighborhoods within a city. Therefore, the potential impact would be considered less than significant. (Draft EIR, pp. 4.11-14 to 4.11-15)

Impact LAND-2: The proposed Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulations adopted for the purpose of avoiding or mitigating an environmental effect.

The proposed Project includes Housing Element Update, Safety Element Update, and Environmental Justice goals, policies, and programs that would be adopted as part of the General Plan and, consequently, would be generally considered consistent with those General Plan policies. The updated elements would comply with applicable State Planning Law requirements for these general plan elements, and the proposed housing sites identified within the Housing Element Update would allow the City to meet its RHNA as identified by ABAG. Several zoning amendments are proposed to allow for an increase in residential development within the Planning Area and include rezoning a commercial office zoning district to mixed-use; increasing allowable densities and standalone residential building heights in mixed-use zoning districts; and making changes to development standards within the R-2 through R-5 zoning districts to allow for more housing development. Future development facilitated by the Project would be required to be consistent with the amended General Plan and zoning designations, as well as applicable development standards. Potential adverse physical effects on the environment that could result from future development facilitated by the Project are addressed in the appropriate environmental

sections of the Draft EIR, however, this future development associated would need to adhere to existing General Plan goals and policies and would be reviewed for adherence to the General Plan and the applicable zoning regulations.

The proposed Project would also be consistent with the growth projections included in Association of Bay Area Government's Plan Bay Area 2050, which indicates geographic areas ("Growth Geographies" or "geographies") to guide the plan's strategies for future growth in housing and jobs over the next 30 years. These Growth Geographies are identified either by local jurisdictions or because of their proximity to transit or access to opportunity. There are High Resource Areas, Priority Development Areas, and Transit-Rich Areas Plan Bay Area 2050 growth geographies located within Redwood City. The proposed housing sites would further new housing development in City in compliance with its RHNA, which would advance residential growth promoted in Plan Bay Area 2050. The Project is consistent with the RHNA and Plan Bay Area 2050. Therefore, the proposed Project would not result in a significant environmental impact due to a conflict with the General Plan, zoning ordinance, or other land use plan, policy, or regulations. (Draft EIR, pp. 4.11-15 to 4.11-16)

4.12. Mineral Resources

Because mineral, gas, and oil resources are absent from Redwood City, the Project will not result in the loss of known mineral resource of value to the region or state, nor would it result in the loss of locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. No further analysis of this issue is included in the EIR. (Draft EIR, p. 4.12-1)

4.13. Noise

Impact NOISE-1: The proposed Project would not result in generation of a substantial temporary increase in ambient noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

Implementation of the Project would involve construction that would result in temporary construction-period noise generation. Construction activities associated with development would typically generate noise from demolition, site preparation, and grading phases, including use of heavy-duty equipment such as bulldozers, excavators, graders, loaders, scrapers, and trucks; loaders and excavators, cranes and/or material hoists/lifts; general engine operation and mechanical system and associated noise from fans, gears, propulsion of wheels or tracks; back-up alarms, noise from higher levels of equipment power outputs ("loads"); vehicle trips for workers, vendors, and hauling trucks. However, as discussed in the Draft EIR (Draft EIR pp. 4.13-20 to 4.13-29), future development facilitated by the Project would result in construction activities that could temporarily increase ambient noise levels by 10 dB or more, however, the City's existing Municipal Code requirements and General Plan policies would ensure construction activities do not occur during the most sensitive time periods (e.g., evening and nighttime periods) and would require future discretionary development facilitated by the Project to assess and minimize construction noise levels consistent with City goals, policies, and code standards. Therefore, this impact would be less than significant. (Draft EIR, pp. 4.13-25 to 4.13-28)

Impact NOISE-2: The proposed Project would not result in generation of a substantial permanent increase in ambient noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

Implementation of the Project could lead to increased vehicle traffic on the local roadway system, and traffic-related noise levels could pose land use compatibility issues or result in a substantial permanent increase in traffic-related noise levels throughout the Planning Area. Project implementation could also involve increases in stationary noise and other sources of noise within the Planning Area. However, the traffic noise modeling conducted for the Draft EIR indicates that development facilitated by the Project would not substantially increase traffic volumes or traffic noise levels along U.S. 101, El Camino Real, and Woodside Road. The traffic noise modeling indicates that traffic noise levels could increase by more than one decibel on Veterans Boulevard, Winslow Street, Brewster Avenue, and Chestnut Street. In addition, development facilitated by the Project would be required to adhere to the State's mandatory noise standards (California Building Code, Section 1207.4), which would ensure residential and mixed-use structures within the Planning Area meet or exceed the 45 dBA CNEL standard.

Development facilitated by the Project would increase residential and commercial development within the Planning Area, including mixed use development, and noise from these uses is generally short-term and intermittent. The City's existing General Plan includes goals and policies that minimize the impact of ambient and operational noise levels throughout the Planning Area, and Redwood City Municipal Code Chapter 24 (Noise Regulation) establishes the City's standards related to noise. Thus, compliance with General Plan goals and policies and the Municipal Code would ensure that future stationary noise sources from development facilitated by the Project would not expose people to a substantial permanent increase in noise levels. Therefore, this impact would be less than significant. (Draft EIR, pp. 4.13-28 to 4.13-40)

Impact NOISE-4: The proposed Project would not expose people residing or working in the area to excessive noise levels due to 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 closest airport to the Planning Area is the San Carlos Airport. The Planning Area is not located in any noise contour zone associated with this airport and therefore development facilitated by the Project would not expose people residing or working in the Planning Area to excessive airport-related noise levels. This impact would be less than significant. (Draft EIR, p. 4.13-44)

4.14. Population and Housing

Impact POP-1: The proposed Project 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 road or other infrastructure).

Implementation of the proposed Project would result in a net increase of 11,277 dwelling units and 23,616 residents within the Planning Area by 2040 (of which 7,003 dwelling units would be facilitated by the Housing Element Update during the 6th Housing Cycle planning period). The Project includes rezoning, creation of new zoning districts, changing selected development

standards to allow an increase in development density/intensity, and General Plan text and map amendments to allow for an increased in development within the City. The Housing Element Update is intended to accommodate the City's RHNA share determined by ABAG for the 2023-2031 planning period. As such, the population growth associated with the Housing Element Update would not be unplanned. In addition, the population growth would also be consistent with Plan Bay Area 2050, and the Project would not induce substantial unplanned population growth. Therefore, this impact would be considered less than significant. (Draft EIR, p. 4.14-7)

Impact POP-2: The proposed Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

Although it is possible that new development facilitated by the Project could result in displacement of existing residents, existing housing units that are displaced would be expected to be replaced by higher-density residential development. Therefore, implementation of the Project would result in the net increase of units within the City and would not result in displacement of substantial numbers of population or housing. This impact would be considered less than significant. (Draft EIR, p. 4.14-8)

4.15. Public Services

Impact PUB-1: The proposed Project 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 any of the public services.

Fire Protection. The General Plan contains goals and policies regarding providing adequate fire protection services, including maintaining sufficient personnel and the highest level of technology and equipment to meet service requirements of new growth and other specific needs. Development facilitated by the Project would be required to pay fees for fire protection services, future development would not have a significant effect on service demands. If additional fire protection facilities and/or resources are needed in the Planning Area, new and/or expanded facilities would need to comply with existing environmental regulations, which would include a development review process and environmental review pursuant to CEQA. Therefore, this impact would be less than significant.

Police Protection. The General Plan contains goals and policies regarding providing adequate police protection services, including maintaining sufficient personnel and the highest level of technology and equipment to meet service requirements of new growth and other specific needs. The increased land use intensity in the Planning Area could increase the frequency of emergency and non-emergency calls to the Redwood City Police Department compared to existing conditions. The Project is not anticipated to increase demand for police protection to the extent that new facilities would be required, however, incrementally increased demand on police protection services would be offset by increased property tax revenues which can then be used for the maintenance and/or expansion of police protection facilities. If new or expanded police facilities are required as a result of population growth, the new or expanded facility would need to comply with existing environmental regulations, which would include a development review process and environmental review pursuant to CEQA. Therefore, this impact would be less than significant.

Schools. Although the proposed Project would result in increased residential building area and a higher population in the Planning Area, statewide trends in declining student enrollment rates are expected to result in a decrease in the number of students in the Planning Area. Projects within the Planning Area would be required to pay all applicable school fees. Development Impact Fees finance the construction and/or reconstruction of school facilities needed to accommodate students coming from new development, and individual projects adding 500 square feet or more of living space must pay a school impact fee, which would be shared between Sequoia Union High School District and the elementary/middle school districts. As discussed in the Draft EIR (Draft EIR pp. 4.15-11 to 4.15-12), payment of school impact fees is deemed to constitute full and complete mitigation for potential impacts to schools caused by development. In addition, any school facility updates or expansions that may be required to serve the additional student population generated by development under the Project would be required to undergo environmental review if and when they are constructed, and appropriate measures would be identified and implemented as applicable to reduce any construction-related or operational effects of such facilities. Therefore, this impact would be less than significant.

Other Public Facilities. Other public facilities and services provided within the Planning Area include libraries and City administrative services. The Building Community Element of the General Plan contains adopted goals, policies, and implementation programs to ensure sufficient access to libraries and other public facilities. While population growth from development facilitated by the Project would be expected to result in increased use of public library facilities, the Project does not specifically include any new or expanded public facilities; in addition, if any new or expanded public facilities are proposed in the future, such construction and/or expansion would be subject to CEQA, and environmental analysis prepared pursuant to CEQA would identify potentially significant impacts and appropriate mitigation measures. Therefore, this impact would be less than significant.

Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered facilities. This impact would be less than significant. (Draft EIR, pp. 4.15-9 to 4.15-13)

4.16. Recreation

Impact REC-1: The proposed Project 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.

Development facilitated by the proposed Project would result in an increase in population that would generate a greater demand for parks and recreational facilities in the Planning Area and decrease the level of service in the Planning Area to an extent. The Redwood City General Plan contains policies and implementation programs to ensure sufficient access to a variety of high-quality, accessible parks and recreation facilities. The City requires development projects to meet parkland dedication requirements through the development review process. A project that does not comply with the parkland dedication requirement would not be approved. Development facilitated by the Project would also be subject to Development Impact Fees (DIF) fees, as adopted, and the City's Quimby Ordinance. These parks and recreation funding mechanisms would offset the incremental increase in demand for park facilities from implementation of the Project. Therefore, future development of public parks in the Planning Area plus individual project payment of City adopted park in-lieu fees and/or dedication of parkland to the City in fee title and free of

encumbrances would ensure that impacts on parks and recreational facilities would be less than significant. (Draft EIR, pp. 4.16-13 to 4.16-15)

Impact REC-2: The proposed Project does not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

The Project does not propose the construction or expansion of recreational facilities. Should open space/recreation improvements associated with development under the Project be proposed, these improvements would mostly likely take place on already developed or previously developed property and/or would create little or no additional impacts within other issue areas (e.g., noise, air quality, traffic). Further, any environmental issues associated with the discretionary, non-exempt construction of potential new facilities would be subject to environmental review on a project-by-project basis pursuant to CEQA. Through the routine planning and environmental impact assessment process, significant environmental impacts that might result from park or recreational facility development would be evaluated, and potential mitigation measures would be identified. Therefore, because the Project does not include construction or expansion of recreational facilities which might have an adverse physical effect on the environment, and this impact would be less than significant. (Draft EIR, pp. 4.16-15 to 4.16-16)

4.17. Transportation

Impact TR-1: The proposed Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities.

The Circulation Element of the General Plan (2010), and multimodal plans and programs in RWCmoves (2018) and RWC Walk Bike Thrive (June 2022), support the buildout of the proposed Project. Future subsequent infrastructure improvements, including any new roadway, bicycle, pedestrian, and transit improvements, and development sites proposed under the Project would be subject to review and designed in accordance with all applicable City guidelines, standards, and specifications related to transit, roadway, bicycle, or pedestrian facilities and services as included in the Redwood City General Plan (2010), RWCmoves (2018), RWC Walk Bike Thrive (June 2022), San Mateo Countywide Transportation Plan 2040 (2017), and the San Mateo County Comprehensive Bicycle and Pedestrian Plan (2021). In addition, the City requires the preparation of a local transportation analysis to evaluate individual projects against the goals, policies, and actions in the General Plan and RWCmoves, as well as identify any existing or planned transit, roadway, bicycle, or pedestrian facilities that may be affected by the project.

Development facilitated by the proposed Project would be subject to all applicable City guidelines, standards, and specifications, and therefore the Project would not conflict with adopted goals, policies, plans or programs for transit, roadway, bicycle, or pedestrian facilities. Therefore, the proposed Project would not result in a conflict with a program, plan, ordinance, or policy addressing the circulation system, and this would be less than significant impact. (Draft EIR, pp. 4.17-34 to 4.17-35)

Impact TR-3: The proposed Project 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).

The proposed Project does not include modifications to the design of local streets or intersections; however, subsequent infrastructure improvements under the Project, including any new roadway, bicycle, pedestrian, and transit improvements, would be subject to, and designed in accordance with City standards and specifications which address potential design hazards including sight distance, driveway placement, and signage and striping. Additionally, any new transportation facilities, or improvements to such facilities associated with subsequent infrastructure improvements would be constructed based on industry design standards and best practices consistent with the City's zoning code and building design and inspection requirements. The City's evaluation of future individual project access and circulation will incorporate analysis with respect to City standards for vehicular level of service and queueing, as well as for service to pedestrians, bicyclists, and transit users. Therefore, the this would be a less than significant impact. (Draft EIR, pp. 4.17-43 to 4.17-44)

Impact TR-4: The proposed Project would not result in inadequate emergency vehicle access.

Emergency access to development facilitated by the Project would be subject to review by Redwood City in accordance with industry design standards, including the City of Redwood City's 2019 Engineering Standards, relevant sections from RWCmoves (2017), and responsible emergency service agencies, which would ensure that projects meet all emergency access and design standards. The City also requires the preparation of construction management plans to minimize temporary obstruction of traffic during site construction. In addition, emergency responders maintain response plans that include use of alternate routes, sirens, and other methods to bypass congestion and minimize response times. Therefore, adequate emergency access would be provided to development facilitated by the Project, and the impact would be less than significant. (Draft EIR, p. 4.17-44)

4.19. Utilities and Service Systems

Impact UTIL-1: The proposed Project 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.

Site-specific impacts related to utilities systems and infrastructure from development facilitated by the Project would be analyzed and mitigated, if necessary, at the individual project level during the City's development review process. The Project 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. This impact would be less than significant. (Draft EIR, pp. 4.19-19 to 4.19-26)

Impact UTIL-2: There would be sufficient water supplies available to serve the proposed Project and reasonably foreseeable future development during normal, dry and multiple dry years.

Potential water-related impacts from development facilitated by the Project would be evaluated and identified, along with measures to mitigate any significant impacts, as part of the CEQA compliance process for future project-specific proposals, including but not limited to having development projects install an extension of recycled water supply pipelines to each 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 design criteria of recycled water system pursuant to City of Redwood City standards. In adherence with SB 610, any new development project subject to CEQA that meets specific development specifications, such as residential development with over 500 dwelling units, would also need to complete a Water Supply Assessment (WSA). Implementation of the Urban Water Management Plan (UWMP) Water Shortage Contingency Plan (WSCP); adopted General Plan goals, policies, and implementation programs identified in the Draft EIR (see Draft EIR pp. 4.19-9 to 4.19-18) related to safe and reliable water supply; and local and State existing water conservation efforts, in addition to the CEQA compliance process for future site-specific development proposals, would ensure that impacts on water supply of development facilitated by the Project would be less than significant. (Draft EIR, pp. 4.19-26 to 4.19-28)

Impact UTIL-3: The proposed Project would not result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

The Silicon Valley Clean Water (SVCW) Wastewater Treatment Plant (WWTP) serves Redwood City and other jurisdictions. Although the Draft EIR (see Draft EIR p. 4.19-XX) indicates that projected wastewater generated from development facilitated by the Project would be within the City's daily maximum capacity rights for treatment at the WWTP, it is possible that new or expanded facilities may be needed to meet future wastewater demands of all jurisdictions served by SVCW. Any future expansion of existing facilities or construction of new facilities would be required to undergo environmental review pursuant to CEQA. Implementation of General Plan goals, policies, and implementation programs identified in the Draft EIR (see Draft EIR pp. 4.19-9 to 4.19-18) related to wastewater collection and treatment, in addition to the CEQA compliance process for future site-specific development proposals, would ensure that that impacts on wastewater treatment of development facilitated by the Project would be less than significant. (Draft EIR, pp. 4.19-28 to 4.19-30)

Impact UTIL-4: The proposed Project 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.

The increase in solid waste anticipated with development facilitated by the Project would be less than one percent of the Ox Mountain Sanitary Landfill. The General Plan contains goals, policies, and implementation programs intended to reduce impacts related to solid waste disposal, waste diversion from landfills, and recycling and composting education and incentives. However, any proposed new or expanded solid waste facility would need to comply with adopted, mandatory environmental regulations, including CEQA. Therefore, the proposed Project would not have significant short- or long-term impacts regarding solid waste disposal in the Planning Area, and this impact would be less than significant. (Draft EIR, pp. 4.19-30 to 4.19-31)

Impact UTIL-5: The proposed Project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

Development facilitated by the proposed Project would be required to comply with all applicable federal, State, and local statutes and regulations related to solid waste management and reduction. The Infrastructure Element of the adopted General Plan contains one goal, six policies, and four implementation programs related to solid waste. This impact would be less than significant. (Draft EIR, p. 4.19-31)

4.20. Wildfire

Impact WILD-1: The proposed Project would not substantially impair an adopted emergency response plan or emergency evacuation plan.

All major public streets in Redwood City serve as principal evacuation routes and would support an evacuation function; however, in any evacuation, the exact emergency routes used would depend on a number of variables, including the type, scope, and location of the incident. As specific future individual development projects are proposed within the Planning Area, potential construction period emergency access impacts would be evaluated and avoided as part of the regular project review and/or the CEQA compliance process. While an increase in population in the Planning Area could increase evacuation times, the policies and implementation programs proposed in the updated Public Safety Element would ensure adequate emergency response and evacuation procedures are planned for and maintained on a development-by-development basis and Planning Area-wide. Therefore, the proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and this impact is considered less than significant.

The General Plan contains policies and implementation programs that ensure adequate emergency services related to wildfire response in the Planning Area. In addition, the Public Safety Element Update component of the Project proposes new and revised policies and implementation programs that would continue and improve protection of residents and properties through implementation of emergency response plans and requirements for developments to plan for evacuation scenarios and ensure adequate emergency access, and would ensure adequate emergency response and evacuation procedures are planned for and maintained on a development-by-development basis and Planning Area-wide. The Redwood City Fire Department, CAL FIRE, the Redwood City Police Department, and the San Mateo County Sheriff's Office would continue to engage in mutual aid for emergency response and evacuation procedures during wildfire incidents. Potential adverse impacts due to implementation of the proposed Project on emergency access and evacuation would be less than significant. (Draft EIR, pp. 4.20-16 to 4.20-18)

Impact WILD-2: The proposed Project would not result in impacts due to slope, prevailing winds, and other factors, exacerbating wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

The General Plan contains policies and implementation programs related to fire prevention and response in the Planning Area. In addition, the City carries out fuel reduction projects in areas under its jurisdiction, and the San Mateo County Parks Department operates a Wildfire Fuel Management Program and as part of its 2021-2026 list of wildfire fuel management projects is carrying out a project to create and maintain a shaded fuel break along the eastern and southeastern boundary Edgewood County Park, which borders the Planning Area. Development facilitated by the Project located in a Very High Fire Hazard Safety Zone (VHFHSZ) need to be consistent with

General Plan policies and implementation programs addressing the location, design, and protection of new development in VHFHSZ, which includes the foothills within the Planning Area. Future individual development projects would also be required to comply with the City's Municipal Code, including the Building Code, City Fire Department's development review process for new development, State law regarding defensible space, and new policies and programs proposed by the Project that would minimize the potential for impacts related to wildfires and subsequent downhill or downstream impacts, including exposure to wildfire related air pollutants.

Development facilitated by the Project would not result in impacts due to slope, prevailing winds, and other factors exacerbating wildfire risks and exposing project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire because these City and state requirements related to fire protection and the implementation of the proposed policies and implementation programs would ensure that impacts related to slope, prevailing winds, and other factors would be less than significant. (Draft EIR, pp. 4.20-18 to 4.20-21)

Impact WILD-3: The proposed Project would not require the installation or maintenance of associated infrastructure such as roads, fuel breaks, emergency water resources, powerlines, or other utilities that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.

As discussed above (Impact WILD-2), the San Mateo County Parks Department operates a Wildfire Fuel Management Program in its parks to reduce wildfire risks and as part of its 2021-2026 list of wildfire fuel management projects is carrying out a project to create and maintain a shaded fuel break along the eastern and southeastern boundary Edgewood County Park, which borders the Planning Area. The General Plan contains policies and implementation programs related to installation or maintenance of infrastructure for wildfire protection in the Planning Area.

Development facilitated by the Project located in the foothill neighborhoods of the Planning Area that are within VHFHSZ would be regulated in terms of location, design, building materials, and fuel modification/protection. Construction or maintenance of infrastructure that may be required by development facilitated by the Project, such as roads, fuel breaks, emergency water resources, powerlines, or other utilities would be subject to separate environmental review that would minimize or mitigate potentially significant environmental impacts. Implementation of adopted and proposed General Plan policies would ensure that this impact would be less than significant. (Draft EIR, pp. 4.20-21 to 4.20-23)

Impact WILD-4: The proposed Project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes

As discussed above (Impact WILD-2), the San Mateo County Parks Department operates a Wildfire Fuel Management Program in its parks to reduce wildfire risks and as part of its 2021-2026 list of wildfire fuel management projects is carrying out a project to create and maintain a shaded fuel break along the eastern and southeastern boundary Edgewood County Park, which borders the Planning Area. The General Plan contains policies and implementation programs related to installation or maintenance of infrastructure for wildfire protection in the Planning Area. In addition, development facilitated by the Project located within the VHFHSZ is required to comply with California Building Code Chapter 7A regarding fire retardant or ignition resistant

construction materials and California Government Code §51182 regarding defensible space. The Redwood City Building Code also requires fire retardant roofing (§R905.1.3) and fire sprinklers (§903.2).

The General Plan contains adopted policies and implementation programs related to reducing risks to people and structures from runoff, post-fire slope instability, and drainage changes, and proposed policies and implementation programs in the Public Safety Element Update would also help reduce or avoid risks to people and structures from runoff, post-fire slope instability, and drainage changes. Redwood City and San Mateo County requirements for individual project applicants to submit geotechnical reports would ensure development facilitated by the Project would meet geological and flooding safety standards. Therefore, with implementation of existing and proposed General Plan policies and implementation programs and compliance with existing requirements for individual development projects, this impact would be less than significant. (Draft EIR, pp. 4.20-23 to 4.20-25)

6.2. Cumulative Impacts

6.2.1 Aesthetics: The proposed Project would not make a substantial contribution to a significant cumulative impact with respect to aesthetics as follows (Draft EIR pp. 6-3 to 6-4):

(1) Because the vast majority of the Planning Area is urbanized, incremental changes resulting from the proposed Project, in addition to similar incremental changes in the surrounding area, would not result in cumulative impacts with respect to scenic vistas.

(2) Development facilitated by the Project is not expected to substantially disrupt views from an officially designated state scenic highway, and therefore, the proposed Project would not make a substantial contribution to a cumulative significant impact to a scenic highway.

(3) Development facilitated by the Project would be subject to the City's underlying zoning, development, and architectural standards and would be located where similar existing uses occur, they would not result in a significant visual change such that the existing visual character or quality of project sites and their surroundings would be substantially degraded. The proposed Project would not substantially contribute to cumulative significant impacts that would degrade the existing visual character or quality of the area and its surroundings.

(4) Project-related impacts with respect to light and glare were determined to be less than significant because future development would be subject to review and approval by the City prior to approving building permits to ensure that light and glare impacts are less than significant. Therefore, development facilitated by the Project would not substantially contribute to a cumulative light and glare impact.

6.2.2 Agriculture and Forestry: The City of Redwood City General Plan and Zoning do not designate land for agricultural production or timber harvesting within the City limits. The proposed Project would not remove land from agricultural production, rezone agricultural lands to accommodate proposed development, or place development in a location where it may impact existing agricultural operations. As the Project would not impact agricultural or forestry resources,

the proposed Project would not contribute to a cumulative significant impact related to agriculture and forestry resources. (Draft EIR p. 6-4)

6.2.5 Cultural Resources: Implementation of the goals and policies and mitigation measures included within the City's adopted General Plan, potential impacts of future development associated with the Project on known existing cultural resources or previously undiscovered cultural resources would reduce impacts to a less than significant level. Potential cumulative impacts to cultural resources from development facilitated by the Project would therefore not make a significant contribution to any cumulative regional impacts on cultural resources. (Draft EIR p. 6-6)

6.2.6 Energy: The analysis of energy usage is by nature a cumulative analysis focused on whether an individual project's contribution to energy demand is cumulatively considerable. Thus, because development facilitated by the Project would result in a reduction in per capita energy usage compared to the 2040 scenario without Project implementation, this impact would be considered less than significant and the Project would therefore not make a significant contribution to any cumulative regional impacts on energy. (Draft EIR pp. 6-6 to 6-7)

6.2.7 Geology and Soils: Impacts related to geology and soils are generally site specific and not cumulative in nature; as such, the potential for cumulative impacts is limited. Implementation of the Project would not result in a cumulatively considerable impact related to geology and soils. (Draft EIR p. 6-7)

6.2.8 Greenhouse Gas Emissions: The analysis of GHG emissions is by nature a cumulative analysis focused on whether an individual project's contribution to global climate change is cumulatively considerable. Development facilitated by the Project would result in GHG emissions that do not exceed the significance thresholds applied in this EIR and would comply with the 2017 Climate Change Scoping Plan. Therefore the Project would not make a significant contribution to any cumulative regional impacts on greenhouse gas emission. (Draft EIR p. 6-7)

6.2.9 Hazards and Hazardous Materials: Impacts related to hazards and hazardous materials are generally site-specific and not cumulative in nature because each project site has unique considerations that would be subject to uniform site development and construction standards. As such, the potential for cumulative impacts is reduced. Impacts associated with potential fire hazards occur at individual building sites. These effects are site-specific, and impacts would not be compounded by additional development within the urban setting of the Planning Area. Compliance with the adopted Public Safety Element and the proposed new and revised goals, policies, and implementation programs of the Public Safety Element Update would result in impacts from hazardous materials and fire that would be less than significant. Implementation of the proposed Project would not result in a cumulatively considerable impact. (Draft EIR p. 6-8)

6.2.10 Hydrology and Water Quality: The General Plan contains goals, policies, and implementation programs to protect surface water resources and improve the quality of runoff. In addition, various state laws, including CEQA, require jurisdictions as lead agencies to identify potential hazards related to new development as well as protect important water resources from new development. As such, potential cumulative impacts from development facilitated by the Project would be minimized. Therefore, the Project would not make a significant contribution to

any cumulative regional impact with respect to hydrology and water quality. (Draft EIR pp. 6-8 to 6-9)

6.2.11 Land Use: Development facilitated by the Project, in conjunction with other cumulative development within the vicinity, would not divide an established community. Implementation of the proposed Project under cumulative conditions would not result in a significant land use impact by physically dividing an established community; therefore, it would not make a cumulatively considerable contribution to an environmental impact related to physically dividing an established community. In addition, the proposed Project would be consistent with applicable land use plans and policies adopted for the purpose of avoiding or reducing an adverse environmental effect. The City would continue to review future development proposals to ensure compliance with the City's environmental policies and utilize its discretion to disapprove projects and/or general plan amendments that would cause significant cumulative impacts to the environment. Therefore, the proposed Project would not make a cumulatively considerable contribution to conflicts with land use plans and policies adopted for the purpose of avoiding or reducing an adverse environmental effect; this potential impact would be less than significant. (Draft EIR p. 6-9)

6.2.12 Mineral Resources: The General Plan map does not identify any mineral resource sites within the Planning Area. Implementation of the proposed Project would not result in mineral resources impacts, and there would be no substantial adverse cumulative mineral resources impact associated with implementation of the Project. (Draft EIR p. 6-9)

6.2.13 Noise: Construction under the cumulative conditions would require compliance with the City Noise Ordinance that implements General Plan policies and measures designed to protect residents from excessive construction noise and vibration, to require the appropriate evaluation of construction noise and vibration impacts at sensitive receptor locations, and to implement feasible construction noise and vibration control measures when development occurs near noise-sensitive land uses. Therefore, construction noise would not make a cumulatively considerable contribution to a significant cumulative construction noise impact. Similarly, Project implementation under cumulative conditions will require compliance with Redwood City Municipal Code noise standards that limit or mitigate noise impacts on or from new development in noise-impacted areas to reduce noise levels to acceptable levels. Once constructed, development projects would not generate significant increases in traffic noise levels on a cumulative basis. Therefore, future operations would not make a cumulatively considerable contribution to a significant cumulative operational noise impact. The proposed Project could facilitate the construction of mixed-use and residential projects adjacent to the existing Caltrain railroad, and potential future planned mixed-use and residential projects could be exposed to excessive passenger train vibration levels that exceed FTA-recommended vibration criteria; however, ground-borne operational vibration impacts are site-specific and do not have the potential combine with vibration impacts. No cumulative impact would occur. Therefore, the proposed Project would not result in a cumulative considerable contribution to cumulative noise and vibration impacts. (Draft EIR p. 6-10)

6.2.14 Population and Housing: The potential growth in housing and related population associated with the Project would be consistent with the City's RHNA and Plan Bay Area 2050. Implementation of the proposed Project would result in a net increase in housing, and thus would not make a cumulatively considerable contribution to a regional impact related to a substantial displacement of housing or people. This cumulative impact would be considered less than significant. (Draft EIR p. 11)

6.2.15 Public Services: The increase in demand for public services attributable to the Project would be incremental as development occurs and would be offset by Development Impact Fees and/or special taxes assessments that would offset the costs of increased service needs as necessary and ensure that performance objectives are not substantially affected by incremental increases in land use intensity within service areas. If a new or expanded facilities were to be required as a result of population growth, these new facilities would need to comply with existing environmental regulations, which would include a development review process and environmental review pursuant to CEQA. Increases in student enrollment resulting from project implementation under cumulative conditions would be accommodated within school districts consistent with California Government Code Section 65996, payment of school impact fees in accordance with California Government Code Section 65995 and/or Education Code Section 17620 which constitute full and complete mitigation for potential impacts to schools caused by development. Therefore, the Project's potential cumulative impacts to public services would be less than significant. (Draft EIR p. 11)

6.2.16 Recreation: Development facilitated by the Project would be subject to Development Impact Fees and the City's Quimby Ordinance. These parks and recreation funding mechanisms will offset the incremental and cumulative increase in demand for park facilities from implementation of the Project as well as cumulative development projects. Therefore, the Project would not cause a substantial adverse cumulative impact with respect to recreational facilities, and this impact would be less than significant. (Draft EIR p. 12)

6.2.18 Tribal Cultural Resources: The Historical Resources Element of the adopted General Plan contains goals and policies which will continue to identify, preserve, and protect archaeological and tribal cultural resources within the Planning Area. Consistent with federal and state laws, the General Plans of the surrounding jurisdictions have similar goals and policies to protect cultural resources within their boundaries. State law requires the City and surrounding jurisdictions to notify Native American representatives if tribal human remains are found. Therefore, potential cumulative impacts to tribal cultural resources would be minimized, and future development in the Planning Area under the Project would not make a significant contribution to any cumulative regional impacts on tribal cultural resources. (Draft EIR p. 6-14)

6.2.20 Wildfire: The proposed Project could have a cumulative impact on the ability of local agencies to protect residents, workers, and structures from wildfires due to increases in population and/or activities and ignition sources. However, proposed Public Safety Element policies and implementation programs would help protect residents and structures from wildfires by promoting public education and awareness prior to fires; requiring safe design and construction of buildings within high fire zones; encouraging cooperation and coordination with regional and other local agencies to monitor the City before, and protect/defend hillside areas during, wildfires; and helping to protect downstream and downhill properties from potential landslides, runoff, or pollution associated with wildfires. Development facilitated by the Project, along with other cumulative development, represents an incremental increase in potential fire service demand or impacts after wildfires. However, Project contributions to cumulative wildfire impacts would be minimized by existing mechanisms that provide for funding that can be used toward firefighting and emergency response improvements, which would ensure that the Redwood City Fire Department is able to perform its mission into the future at levels consistent with the General Plan. Therefore, the Project, in combination with cumulative projects, would not result in a cumulatively considerable impact relative to wildfires. (Draft EIR pp. 6-16 to 6-17)

B. Findings Regarding Potentially Significant Impacts

The following potential environmental impacts of the Project 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 4.3 through 4.5, Chapter 4.13, and Chapters 4.17 and 4.18 of the DEIR, as incorporated into the FEIR. The City Council concurs with the conclusions in the DEIR, as incorporated into the FEIR, and makes the following findings with respect to such potentially significant impacts.

4.3. Air Quality

Impact AIR-1: The proposed Project would conflict with or obstruct implementation of the applicable air quality plan.

Mitigation Measures. EIR Mitigation Measure AIR-2 (Draft EIR pp. 4.3-21 to 4.3-22) will be implemented for the Project as provided in the MMRP.

Findings Regarding Impact AIR-1: Based on the EIR and the entire record before the City, the Council finds that incorporating the requirements of Mitigation Measure AIR-2 into the Project would substantially lessen the severity of Impact AIR-1. Mitigation Measure AIR-2 would require applicants prepare project-specific air quality analyses and incorporate mitigation, as necessary, to reduce exhaust emissions of NO_x and other pollutants from construction vehicles; however, since specific development projects are unknown, it cannot be assured that all future development would be able to reduce emissions below BAAQMD thresholds. Nonetheless, because future construction activities could result in ozone precursor and PM emissions that exceed BAAQMD thresholds, the Project could increase the frequency and/or severity of air quality violations in the Bay Area Basin or otherwise impede attainment of air quality standards. Therefore, this impact would 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 EIR to mitigate the effect of Impact AIR-1, and that development facilitated by the Project will provide specific economic, environmental, social, legal, technological and other benefits that will outweigh the significant adverse effects of Impact AIR-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 4.3-16 through 4.3-18 of the DEIR, which includes a full statement of the impact and is hereby incorporated herein in its entirety.

Impact AIR-2: The proposed Project 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. EIR Mitigation Measure AIR-2 (Draft EIR pp. 4.3-21 to 4.3-22) will be implemented for the Project as provided in the MMRP.

Findings Regarding Impact AIR-2: Based on the EIR and the entire record before the City, the Council finds that incorporating the requirements of Mitigation Measure AIR-2 into the Project would substantially lessen the severity of Impact AIR-2. Mitigation Measure AIR-2 would require applicants prepare project-specific air quality analyses and incorporate mitigation, as necessary, to reduce exhaust emissions of NO_x and other pollutants from construction vehicles; however, since specific development projects are unknown, it cannot be assured that all future development would be able to reduce emissions below BAAQMD thresholds. Nonetheless, because future construction activities could result in ozone precursor and PM emissions that exceed BAAQMD thresholds, the Project could increase the frequency and/or severity of air quality violations in the Bay Area Basin or otherwise impede attainment of air quality standards. Therefore, this impact would 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 EIR to mitigate the effect of Impact AIR-2, and that development facilitated by the Project will provide specific economic, environmental, social, legal, technological and other benefits that will outweigh the significant adverse effects of Impact AIR-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 4.3-18 through 4.3-22 of the DEIR, which includes a full statement of the impact and is hereby incorporated herein in its entirety.

Impact AIR-3: The proposed Project would expose sensitive receptors to substantial pollutant concentrations.

Mitigation Measures. EIR Mitigation Measure AIR-2 (Draft EIR pp. 4.3-21 to 4.3-22) will be implemented for the Project as provided in the MMRP.

Findings Regarding Impact AIR-3: Based on the EIR and the entire record before the City, the Council finds that incorporating the requirements of Mitigation Measure AIR-2 into the Project would substantially lessen the severity of Impact AIR-3. Mitigation Measure AIR-2 would require applicants prepare project-specific air quality analyses and incorporate mitigation, as necessary, to reduce exhaust emissions of NO_x and other pollutants from construction vehicles; however, since future, specific development projects are unknown, it cannot be assured that all future development would be able to reduce emissions below BAAQMD thresholds. Nonetheless, because future construction activities could result in ozone precursor and PM emissions that exceed BAAQMD thresholds, the Project could increase the frequency and/or severity of air quality violations in the Bay Area Basin or otherwise impede attainment of air quality standards. Therefore, this impact would 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 EIR to mitigate the effect of Impact AIR-3, and that development facilitated by the Project will provide specific economic, environmental, social, legal, technological and other benefits that will outweigh the significant adverse effects of Impact AIR-3, 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 4.3-22 through 4.3-25 of the DEIR, which includes a full statement of the impact and is hereby incorporated herein in its entirety.

4.4. Biological Resources

Impact BIO-1: The proposed Project 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 CDFW or USFWS.

Mitigation Measures. EIR Mitigation Measures BIO-1, BIO-2a, BIO-2b, BIO-3, BIO-4, BIO-5, BIO-6, BIO-7, BIO-8a, BIO-8b, and BIO-9 (Draft EIR pp. 4.4-37 to 4.4-40) will be implemented for the Project as provided in the MMRP.

Findings Regarding Impact BIO-1: Based on the FEIR and the entire record before the City, the Council finds that incorporating the requirements of Mitigation Measures BIO-1, BIO-2a, BIO-2b, BIO-3, BIO-4, BIO-5, BIO-6, BIO-7, BIO-8a, BIO-8b, and BIO-9 would substantially lessen the severity of Impact BIO-1, such that this potential impact would be less than significant. Mitigation Measure BIO-1 requires project-specific biological resource analyses be conducted with recommended mitigation measures incorporated into the CEQA document for the project and/or adopted as project conditions of approval. Mitigation Measure BIO-2a requires a special-status plant survey be conducted by a qualified botanist, with field survey timing corresponding with the blooming period when target species would be observable; if special status plants cannot be avoided, Mitigation Measure 2b shall be implemented. Mitigation Measure BIO-2b requires development of a compensation plan for impacts to special status plant species, including seed collection in a seed bank for replanting. Mitigation Measure BIO-3 requires consultation with the USFWS if federally-protected animal species or habitats supporting these species are present, and obtaining all required federal permits and approvals necessary to comply with applicable federal requirements. Mitigation Measure BIO-4 requires consultation with the CDFG if habitats potentially supporting the southwestern pond turtle or crotch bumble bee are identified, including habitat avoidance measures required by the CDFW; if habitat cannot be avoided, mitigation measure BIO-6 shall be implemented. Mitigation Measure BIO-5 requires avoiding active burrowing owl nesting and wintering burrows, including implement mitigation strategies as required by the CDFG. Mitigation Measure BIO-6 requires compensation for impacts to special status species habitat through preservation, enhancement, and/or restoration of habitat or assist in the recovery of the species, and mitigation measures required by the USFWS and/or the CDFG incorporated in project plans and conditions of approval. Mitigation Measure BIO-7 requires limiting ground disturbance to outside the avian nesting season, or if during the avian nesting season then establishing staging and storage areas and creating buffers to reduce disturbance, as determined by a qualified biologist. Mitigation Measure BIO-8a requires a bat habitat assessment of trees and structures to be removed to be conducted by a qualified biologist;

if suitable roosting habitat or signs of bats are found, then Mitigation Measure 10 shall be implemented. Mitigation Measure BIO-8b requires a dusk emergence bat survey for roosting bats within 14 days prior to the removal of the tree(s) or structure(s), using acoustic equipment to identify the species; if no roosting bats are found during the survey, then no further action is required, but if roosting bats are found during the survey, a disturbance-free buffer zone shall be established as directed by a qualified biologist. Mitigation Measure BIO-9 requires a Fuel Reduction Management Plan be prepared by a wildland resources expert in coordination with a biologist/ecologist for wildland fire protection activities to ensure that sensitive resources are not impacted by wildland fire protection activities.

Impact BIO-2: The proposed Project 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 Wildlife or U.S. Fish and Wildlife Service.

Mitigation Measures. EIR Mitigation Measures BIO-10, BIO-11, and BIO-12 (Draft EIR pp. 4.4-42 to 4.4-43) will be implemented for the Project as provided in the MMRP.

Findings Regarding Impact BIO-2: Based on the FEIR and the entire record before the City, the Council finds that incorporating the requirements of Mitigation Measures BIO-10, BIO-11, and BIO-12 would substantially lessen the severity of Impact BIO-2, such that this potential impact would be less than significant. Mitigation Measure BIO-10 requires project proponents to obtain all necessary permits pertaining to affected riparian habitat or Waters of the United States, including wetlands, stream channel, and open-water habitat regulated by the USACOE, CDFG, and San Francisco Bay RWQCB; discharge of fill requiring a CWA Section 404 permit from the USACOE; CWA Section 401 certification from the San Francisco Bay RWQCB; and any additional compensation for impacts to riparian habitat and wetlands as determined by the permitting agency. Mitigation Measure BIO-11 requires implementing Best Management Practices to avoid and/or control invasive weeds, particularly during wildland fire protection projects and sea-level rise protection projects. Mitigation Measure BIO-12 requires implementing Best Management Practices to prevent pollutant spills, and erosion and sedimentation near sensitive habitats, including erosion control and spill prevention measures implemented prior to the start project-related activities near riparian areas and associated aquatic habitat and remaining in place throughout the construction duration.

Impact BIO-3: The proposed Project 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.

Mitigation Measures. EIR Mitigation Measures BIO-1, BIO-10, BIO-11, and BIO-12 (Draft EIR pp. 4.4-37 and 4.4-42 to 4.4-43) will be implemented for the Project as provided in the MMRP.

Findings Regarding Impact BIO-3: Based on the FEIR and the entire record before the City, the Council finds that incorporating the requirements of Mitigation Measures BIO-1, BIO-10, BIO-11, and BIO-12 would substantially lessen the severity of Impact BIO-3, such that this potential impact would be less than significant. Mitigation Measure BIO-1 requires project-specific biological resource analyses be conducted with recommended mitigation measures incorporated into the CEQA document for the project and/or adopted as project conditions of approval. Mitigation Measure BIO-10 requires project proponents to obtain all necessary permits pertaining to affected riparian habitat or Waters of the United States, including wetlands, stream channel, and open-water habitat regulated by the USACOE, CDFG, and San Francisco Bay RWQCB; discharge of fill requiring a CWA Section 404 permit from the USACOE; CWA Section 401 certification from the San Francisco Bay RWQCB; and any additional compensation for impacts to riparian habitat and wetlands as determined by the permitting agency. Mitigation Measure BIO-11 requires implementing Best Management Practices to avoid and/or control invasive weeds, particularly during wildland fire protection projects and sea-level rise protection projects. Mitigation Measure BIO-12 requires implementing Best Management Practices to prevent pollutant spills, and erosion and sedimentation near sensitive habitats, including erosion control and spill prevention measures implemented prior to the start project-related activities near riparian areas and associated aquatic habitat and remaining in place throughout the construction duration.

Impact BIO-4: The proposed Project 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. EIR Mitigation Measures BIO-7, BIO-8a, BIO-8b, and BIO-13 (Draft EIR pp. 4.4-38 to 4.4-39 and 4.4-47 to 4.4-48) will be implemented for the Project as provided in the MMRP.

Findings Regarding Impact BIO-3: Based on the FEIR and the entire record before the City, the Council finds that incorporating the requirements of Mitigation Measures BIO-7, BIO-8a, BIO-8b, and BIO-13 would substantially lessen the severity of Impact BIO-4, such that this potential impact would be less than significant. Mitigation Measure BIO-7 requires limiting ground disturbance to outside the avian nesting season, or if during the avian nesting season then establishing staging and storage areas and creating buffers to reduce disturbance, as determined by a qualified biologist. Mitigation Measure BIO-8a requires a bat habitat assessment of trees and structures to be removed to be conducted by a qualified biologist; if suitable roosting habitat or signs of bats are found, then Mitigation Measure 10 shall be implemented. Mitigation Measure BIO-8b requires a dusk emergence bat survey for roosting bats within 14 days prior to the removal of the tree(s) or structure(s), using acoustic equipment to identify the species; if no roosting bats are found during the survey, then no further action is required, but if roosting bats are found during the survey, a disturbance-free buffer zone shall be established as directed by a qualified biologist. Mitigation Measure BIO-13 requires uniformly applied standards for housing development projects to reduce risk of avian collision, including design standards that reduce the amount

of glass facades on new buildings; apply glass and façade treatments in front of glass; avoid, minimize, and treat glass railings and walkways near potential flight corridors; avoid uplighting, light spillage, and use of green and blue lights; and use of motion sensing lights.

4.5. Cultural Resources

Impact CUL-2: The proposed Project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.

Mitigation Measures. EIR Mitigation Measures CUL-2a, CUL-2b, and CUL-2c (Draft EIR pp. 4.5-14 to 4.5-15) will be implemented for the Project as provided in the MMRP.

Findings Regarding Impact CUL-2: Based on the FEIR and the entire record before the City, the Council finds that incorporating the requirements of Mitigation Measures CUL-2a, CUL-2b, and CUL-2c would substantially lessen the severity of Impact CUL-2, such that this potential impact would be less than significant. Mitigation Measure CUL-2a requires that if deposits of prehistoric or historic archaeological materials are encountered during project construction activities for future development of individual projects within the Planning Area, all work within an appropriate buffer area around the discovery shall be stopped and a qualified archaeologist meeting federal criteria under 36 CFR 61 shall be contacted to assess the deposit(s) and make recommendations to the City Community Development and Transportation Department regarding their treatment, consistent with CEQA Guidelines Section 15126.4 (b)(3). Mitigation Measure CUL-2b requires all construction crews to undergo adequate training for the identification of federal or state-eligible cultural resources prior to the issuance of grading permits. Mitigation Measure CUL-2c requires that future development project applicants comply with the City's Historic Resources Management Plan and prepare a cultural resources plan in compliance with the applicable California Environmental Quality Act regulations for all historic site or sites which have a potential for the on-site discovery, reconnaissance and identification of cultural resources, including a records search conducted by the Northwest Information Center of the California Archaeological Inventory; interviews with persons knowledgeable about the history of the site, as approved by staff and within a time period designated by staff; and review of maps archived at the local history room of the Main Library and other historical data contained in the Redwood City Inventory.

Impact CUL-3: The proposed Project would not disturb any human remains, including those interred outside of formal cemeteries.

Mitigation Measures. EIR Mitigation Measures CUL-3a and CUL-3b (Draft EIR pp. 4.5-15 to 4.5-16) will be implemented for the Project as provided in the MMRP.

Findings Regarding Impact CUL-3: Based on the FEIR and the entire record before the City, the Council finds that incorporating the requirements of Mitigation Measures CUL-3a and CUL-3b would substantially lessen the severity of Impact CUL-3, such that this impact would be less than significant. Mitigation Measure CUL-3a requires that if human

remains are encountered during ground-disturbing activities within specific project sites, work within 50 feet shall be stopped and the San Mateo County Coroner notified of any human remains; at the same time, a qualified archaeologist shall be contacted to assess the situation and consult with the appropriate agencies; and if the human remains are of Native American origin, the Coroner shall notify the NAHC so that NAHC can identify a Most Likely Descendant (MLD) to inspect the site and provide recommendations for the proper treatment or disposition, with proper dignity, of the remains and any associated grave goods. Mitigation Measure CUL-3b requires all construction crews undergo a training session prior to issuance of grading permits to inform them of the presence and nature of federal or state-eligible cultural resources and the potential for previously undiscovered archaeological resources and human remains within specific project sites, of the laws protecting these resources and associated penalties, and of the procedures to follow should they discover cultural resources during project-related work.

4.13. Noise

Impact NOISE-3: The proposed Project would not result in generation of excessive ground-borne noise levels.

Mitigation Measures. EIR Mitigation Measure NOISE-1 (Draft EIR p. 4.13-43) will be implemented for the Project as provided in the MMRP.

Findings Regarding Impact NOISE-3: Based on the FEIR and the entire record before the City, the Council finds that incorporating the requirements of Mitigation Measure NOISE-1 would substantially lessen the severity of Impact NOISE-3, such that this potential impact would be less than significant. Mitigation Measure NOISE-1 requires that require new residential projects located within 200 feet of the railroad track and commercial projects located within 120 feet conduct a train ground vibration and vibration noise evaluation consistent with approved vibration assessment methodologies (e.g., Caltrans, Federal Transportation Authority).

4.17. Transportation

Impact TR-2: The proposed Project would conflict or be inconsistent with CEQA Guidelines section 15064.3(b).

Mitigation Measures. EIR Mitigation Measures TR-1 and TR-2 (Draft EIR p. 4.17-41) will be implemented for the Project as provided in the MMRP.

Findings Regarding Impact TR-2: Based on the FEIR and the entire record before the City, the Council finds that incorporating the requirements of Mitigation Measures TR-1 and TR-2 into the Project would substantially lessen the severity of Impact TR-2. Mitigation Measure TR-1 would require all future residential development projects that do not meet the City's VMT screening criteria and exceed the City's home-based residential VMT threshold to develop a TDM Plan and quantify the VMT effectiveness of the plan.

Residential projects that are unable to fully reduce their VMT impact because of land use context (i.e., low-density suburban area, low transit access, etc.) would be required to demonstrate that they are making a good faith effort toward maximizing their TDM plan and associated VMT reductions. However, since the City cannot demonstrate that the VMT from each future residential development project would be reduced to the degree that is needed to eliminate the VMT impact, the home-based VMT per resident impact would be considered *significant and unavoidable* with Mitigation TR-1. Mitigation Measure TR-2 would require the City to create a community-wide multimodal transportation impact fee program and/or support and work cooperatively with C/CAG to implement a countywide or sub-regional VMT mitigation program to which future residential projects would be required to pay applicable community-wide, countywide, and/or sub-regional VMT fees, once established. However, since the City has no specified timeline for a community-wide multimodal transportation impact fee program and the City has no control of C/CAG's process and outcome of a regional VMT mitigation program outside its jurisdiction, the home-based VMT per resident impact would be considered *significant and unavoidable* with Mitigation TR-2. 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 EIR to mitigate the effect of Impact TR-2, and that development facilitated by the Project will provide specific economic, environmental, social, legal, technological and other benefits that will outweigh the significant adverse effects of Impact TR-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 4.17-35 through 4.17-43 of the DEIR, which includes a full statement of the impact and is hereby incorporated herein in its entirety.

4.18. Tribal Cultural Resources

Impact TRC-1: The Project would not cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Mitigation Measures. EIR Mitigation Measures TCR-1a, TCR-1b, TCR-2a, TCR-2b, and TCR-3 (Draft EIR pp. 4.18-7 to 4.18-9) will be implemented for the Project as provided in the MMRP.

Findings Regarding Impact TRC- 1: Based on the FEIR and the entire record before the City, the Council finds that incorporating the requirements of Mitigation Measures TCR-

1a, TCR-1b, TCR-2a, TCR-2b, and TCR-3 would substantially lessen the severity of Impact TRC-1, such that this potential impact would be less than significant. Mitigation Measure TCR-1a requires that if deposits of prehistoric or historic archaeological and tribal cultural resource materials are encountered during project construction activities for future development, all work within an appropriate buffer area around the discovery shall be stopped and a qualified archaeologist meeting federal criteria under 36 CFR 61 shall be contacted to assess the deposit(s) and make recommendations to the City Community Development and Transportation Department regarding their treatment, consistent with CEQA Guidelines Section 15126.4 (b)(3). Mitigation Measure TCR-1b requires all construction crews to undergo adequate training for the identification of federal or state-eligible cultural resources prior to the issuance of grading permits. Mitigation Measure TCR-2a requires that if human remains are encountered during ground-disturbing activities within specific project sites, work within 50 feet shall be stopped and the San Mateo County Coroner (Coroner) notified of any human remains; at the same time, a qualified archaeologist shall be contacted to assess the situation and consult with the appropriate agencies; and if the human remains are of Native American origin, the Coroner shall notify the NAHC so that NAHC can identify a Most Likely Descendant (MLD) to inspect the site and provide recommendations for the proper treatment or disposition, with proper dignity, of the remains and any associated grave goods. Mitigation Measure TCR-2b requires all construction crews to undergo a training session prior to issuance of grading permits to inform them of the presence and nature of federal or state-eligible cultural resources and the potential for previously undiscovered archaeological and/or tribal cultural resources and human remains within specific project sites, of the laws protecting these resources and associated penalties, and of the procedures to follow should they discover cultural resources during project-related work. Mitigation Measure TCR-3 requires that future development project applicants comply with the City's Historic Resources Management Plan and prepare a cultural resources plan in compliance with the applicable California Environmental Quality Act regulations for all historic site or sites which have a potential for the on-site discovery, reconnaissance and identification of cultural resources, including a records search conducted by the Northwest Information Center of the California Archaeological Inventory; interviews with persons knowledgeable about the history of the site, as approved by staff and within a time period designated by staff; and review of maps archived at the local history room of the Main Library and other historical data contained in the Redwood City Inventory.

6.2. Cumulative Impacts

6.2.3 Air Quality:

Mitigation Measures. EIR Mitigation Measure AIR-2 (Draft EIR pp. 4.3-21 to 4.3-22) will be implemented for the Project as provided in the MMRP.

Findings Regarding Cumulative Air Quality Impact: Based on the FEIR and the entire record before the City, the Council finds that incorporating the requirements of Mitigation Measure AIR-2 would substantially lessen the severity of the cumulative air quality impact.

Mitigation Measure AIR-2 requires applicants prepare project-specific air quality analyses and incorporate mitigation, as necessary, to reduce exhaust emissions of NOX and other pollutants from construction vehicles; however, since specific development projects are unknown, it cannot be assured that all future development would be able to reduce emissions below BAAQMD thresholds. Nonetheless, because future construction activities could result in ozone precursor and PM emissions that exceed BAAQMD thresholds, the Project could increase the frequency and/or severity of air quality violations in the Bay Area Basin or otherwise impede attainment of air quality standards. Therefore, this impact would 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 EIR to mitigate the effect of the cumulative air impact, and that development facilitated by the Project will provide specific economic, environmental, social, legal, technological and other benefits that will outweigh the significant adverse effects of the cumulative air impact, 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 4.3-18 through 4.3-22 and pages 6-4 and 6-5 of the DEIR, which include a full statement of the impact and is hereby incorporated herein in its entirety.

6.2.5 Biological Resources:

Mitigation Measures. EIR Mitigation Measures BIO-1 through BIO-13 (Draft EIR pp. 4.4-37 to 4.4-40, 4.4-42 to 4.4-43, and 4.4-47 to 4.4-48) will be implemented for the Project as provided in the MMRP.

Findings Regarding Cumulative Biological Resources Impact: Based on the FEIR and the entire record before the City, the Council finds that incorporating the requirements of Mitigation Measures BIO-1 through BIO-13 would substantially lessen the severity of the cumulative biological resources impact such that this potential cumulative impact would be less than significant. Mitigation Measure BIO-1 requires project-specific biological resource analyses be conducted with recommended mitigation measures incorporated into the CEQA document for the project and/or adopted as project conditions of approval. Mitigation Measure BIO-2a requires a special-status plant survey be conducted by a qualified botanist, with field survey timing corresponding with the blooming period when target species would be observable; if special status plants cannot be avoided, Mitigation Measure 2b shall be implemented. Mitigation Measure BIO-2b requires development of a compensation plan for impacts to special status plant species, including seed collection in a seed bank for replanting. Mitigation Measure BIO-3 requires consultation with the USFWS if federally-protected animal species or habitats supporting these species are present, and obtaining all required federal permits and approvals necessary to comply with applicable federal requirements. Mitigation Measure BIO-4 requires consultation with the CDFG if habitats potentially supporting the southwestern pond turtle or crotch bumble bee are identified, including habitat avoidance measures required by the CDFW; if habitat cannot be avoided, mitigation measure BIO-6 shall be implemented. Mitigation Measure BIO-5 requires avoiding active burrowing owl nesting and wintering burrows, including

implement mitigation strategies as required by the CDFG. Mitigation Measure BIO-6 requires compensation for impacts to special status species habitat through preservation, enhancement, and/or restoration of habitat or assist in the recovery of the species, and mitigation measures required by the USFWS and/or the CDFG incorporated in project plans and conditions of approval. Mitigation Measure BIO-7 requires limiting ground disturbance to outside the avian nesting season, or if during the avian nesting season then establishing staging and storage areas and creating buffers to reduce disturbance, as determined by a qualified biologist. Mitigation Measure BIO-8a requires a bat habitat assessment of trees and structures to be removed to be conducted by a qualified biologist; if suitable roosting habitat or signs of bats are found, then Mitigation Measure 10 shall be implemented. Mitigation Measure BIO-8b requires a dusk emergence bat survey for roosting bats within 14 days prior to the removal of the tree(s) or structure(s), using acoustic equipment to identify the species; if no roosting bats are found during the survey, then no further action is required, but if roosting bats are found during the survey, a disturbance-free buffer zone shall be established as directed by a qualified biologist. Mitigation Measure BIO-9 requires a Fuel Reduction Management Plan be prepared by a wildland resources expert in coordination with a biologist/ecologist for wildland fire protection activities to ensure that sensitive resources are not impacted by wildland fire protection activities. Mitigation Measure BIO-10 requires project proponents to obtain all necessary permits pertaining to affected riparian habitat or Waters of the United States, including wetlands, stream channel, and open-water habitat regulated by the USACOE, CDFG, and San Francisco Bay RWQCB; discharge of fill requiring a CWA Section 404 permit from the USACOE; CWA Section 401 certification from the San Francisco Bay RWQCB; and any additional compensation for impacts to riparian habitat and wetlands as determined by the permitting agency. Mitigation Measure BIO-11 requires implementing Best Management Practices to avoid and/or control invasive weeds, particularly during wildland fire protection projects and sea-level rise protection projects. Mitigation Measure BIO-12 requires implementing Best Management Practices to prevent pollutant spills, and erosion and sedimentation near sensitive habitats, including erosion control and spill prevention measures implemented prior to the start project-related activities near riparian areas and associated aquatic habitat and remaining in place throughout the construction duration. Mitigation Measure BIO-13 requires uniformly applied standards for housing development projects to reduce risk of avian collision, including design standards that reduce the amount of glass facades on new buildings; apply glass and façade treatments in front of glass; avoid, minimize, and treat glass railings and walkways near potential flight corridors; avoid uplighting, light spillage, and use of green and blue lights; and use of motion sensing lights.

6.2.17 Transportation:

Mitigation Measures. EIR Mitigation Measures TR-1 and TR-2 (Draft EIR p. 4.17-41) will be implemented for the Project as provided in the MMRP.

Findings Regarding Cumulative Transportation Impact: Based on the FEIR and the entire record before the City, the Council finds that incorporating the requirements of Mitigation Measures TR-1 and TR-2 would substantially lessen the severity of the

cumulative transportation impact. Mitigation Measure TR-1 would require all future residential development projects that do not meet the City’s VMT screening criteria and exceed the City’s home-based residential VMT threshold to develop a TDM Plan and quantify the VMT effectiveness of the plan. Residential projects that are unable to fully reduce their VMT impact because of land use context (i.e., low-density suburban area, low transit access, etc.) would be required to demonstrate that they are making a good faith effort toward maximizing their TDM plan and associated VMT reductions. However, since the City cannot demonstrate that the VMT from each future residential development project would be reduced to the degree that is needed to eliminate the VMT impact, the home-based VMT per resident impact would be considered ***significant and unavoidable*** with Mitigation TR-1. Mitigation Measure TR-2 would require the City to create a community-wide multimodal transportation impact fee program and/or support and work cooperatively with C/CAG to implement a countywide or sub-regional VMT mitigation program to which future residential projects would be required to pay applicable community-wide, countywide, and/or sub-regional VMT fees, once established. However, since the City has no specified timeline for a community-wide multimodal transportation impact fee program and the City has no control of C/CAG’s process and outcome of a regional VMT mitigation program outside its jurisdiction, the home-based VMT per resident impact would be considered ***significant and unavoidable*** with Mitigation TR-2. 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 EIR to mitigate the effect of the cumulative transportation impact, and that development facilitated by the Project will provide specific economic, environmental, social, legal, technological and other benefits that will outweigh the significant adverse effects of the cumulative transportation impact, 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 4.17-35 through 4.17-43 and pages 6-12 through 6-13 of the DEIR, which includes a full statement of the impact and is hereby incorporated herein in its entirety.

6.2.19 Utilities and Service Systems:

Mitigation Measures. None. The City has explored the potential to require development that may be constructed under the Project to tie into recycled water infrastructure to reduce demand on potable sources and, thereby, reduce the Project’s cumulative contribution to projected water supply shortages. However, as explained above, it is too speculative at this time to determine whether requiring development under the Project to use recycled water would serve as adequate mitigation and whether said mitigation would reduce potentially significant cumulative impacts to a less than significant level. For example, the feasibility of extending recycled water infrastructure to future development depends on a “critical mass” of development that could connect to new or existing recycled water infrastructure and to the proximity of existing infrastructure to future project sites.

Findings Regarding Cumulative Utilities Impact: Based on the FEIR and the entire record before the City, the Council finds that (1) the Project would contribute to a

cumulatively significant water supply impact in combination with non-Project development that may occur within the Planning Area, and (2) the City has determined that requiring projects to use alternative water supply sources as mitigation is infeasible, this cumulative utilities impact would remain *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 EIR to mitigate the effect of the cumulative utilities impact, and that development facilitated by the Project will provide specific economic, environmental, social, legal, technological and other benefits that will outweigh the significant adverse effects of the cumulative utilities impact, 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 6-14 through 6-16 of the DEIR, 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 Project would consist of amendments to the Housing, Built Environment, Public Safety, Building Community, and Natural Resources Elements of the General Plan, specific amendments to the Redwood City Municipal Code and Zoning Code, and amendments to the Redwood City Zoning Map to achieve the following City objectives:

- New Housing. Comply with State Laws related to Housing Elements by facilitating new housing growth throughout the Planning Area in response to the region's need for more affordable and market rate housing, as well as develop housing solutions to meet the City's new Regional Housing Needs Allocation (RHNA);
- Housing Choice. Meet Housing Needs through a Variety of Housing Choices. Respond to the broad range of housing needs in City by supporting a mix of housing types, densities, affordability levels, and designs;
- Healthy Neighborhoods. Promote healthy neighborhoods that incorporate best practices related to land use, racial equity, mobility, air quality, housing, affordability, safety, environmental justice, community services, and design;
- Equity. Combat housing discrimination, eliminate racial bias, undo historic patterns of segregation, and lift barriers that restrict access in order to foster inclusive communities and achieve racial equity. Identify communities most vulnerable to climate change impacts and establish new goals, policies, and programs for equitable public safety, emergency preparedness, response and recovery;

- Fair Housing. Affirmatively further fair housing opportunities and promote housing throughout the community for all, including promoting, and assisting in the development of housing that meets the needs of special needs communities in Redwood City;
- Inclusivity. Comply with State Laws related to Environmental Justice by engaging residents and stakeholders to ensure equitable and inclusive processes, policies, investments, and service systems. Develop strategies to help residents in disadvantaged communities have access to healthy foods, parks, mobility options activity, public programs, and safe homes;
- Technology. Embrace technology and innovative practices to create smart, sustainable communities and adaptable infrastructure systems;
- Safety. Comply with State Laws related to Safety Elements by establishing new General Plan goals, policies, and programs to include climate change adaptation and resiliency planning, sea level rise, and additional wildfire measures, and provide direction to improve emergency preparedness, response, and recovery;
- Adaptive and Resilient Communities. Develop strategies that help people, infrastructure, and community assets adapt to and recover from evolving climate threats and vulnerabilities, and from natural and human-caused hazards; and
- Conformance with Regulatory Requirements. Develop a Safety Element that meets all the requirements under Government Code Section 65302(g), and which reflects State and local regulations for specific hazards, with the intent of protecting people and key infrastructure from damage resulting from an environmental hazard.

B. Significant Environmental Impacts of the Project

Based on the analyses in Chapters 4.1 through 4.20 of the DEIR, 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 DEIR and MMRP, except for the following:

- **Impact AIR-1:** Adoption of the proposed Project could conflict with or obstruct implementation of the applicable air quality plan.
- **Impact AIR-2:** Development facilitated by the proposed Project could 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 AIR-3:** Development facilitated by the proposed Project could expose sensitive receptors to substantial pollutant concentrations.
- **Impact AIR-5:** Adoption of the proposed Project could cause substantial adverse cumulative impacts with respect to Air Quality.
- **Impact TR-2:** Development facilitated by the proposed Project could conflict or be inconsistent with CEQA Guidelines section 15064.3(b) (Project Generated VMT).
- **Impact UTIL-6:** Development facilitated by the proposed Project could cause substantial adverse cumulative impacts with respect to utilities and service systems.

C. Project Alternatives Descriptions

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

No Project Alternative. The No Project (2010 General Plan) Alternative assumes that development would occur within the Planning Area, but only in the locations and at the densities allowed or anticipated under the 2010 General Plan. Development assumptions for this alternative are shown in Table 5.1 in EIR Chapter 5.0 (Alternatives). It also assumes that the proposed policy changes in the Housing, Land Use (Built Environment), Public Safety, Building Community, and Natural Resources Elements, and the Environmental Justice policies and programs would not occur.

RHNA +15% Residential Buffer. The RHNA +15% Residential Buffer Alternative assumes that 5,276 residential units would be provided for. This alternative assumes that policies and goals associated with the proposed Built Environment Element (Urban Form and Land Use Chapter), Housing Element, Public Safety Element, and the Environmental Justice policies and programs would apply.

Consolidated Housing Sites - Downtown. The Consolidated Housing Sites - Downtown Alternative assumes that the Housing Element's residential development potential would be restricted to the Downtown area. This would result in a reduction in residential and population potential from the Project. The Consolidated Housing Sites - Downtown Alternative will provide development potential of 1,534 units. This Alternative assumes some of the proposed changes to the amendments to the Housing, Built Environment Element (Urban Form and Land Use Chapter) will not occur. Specifically, the increased density for the Mixed Use designations and the redesignation of parcels along Woodside Road would not occur. The proposed changes to the Public Safety Element and the Environmental Justice policies will be applied. The Consolidated Housing Sites-Downtown Alternative may reduce the air quality and transportation impacts associated with the Project's VMT, but the unit count associated with this Alternative will not comply with RHNA and thus, does not comply with State law.

D. Findings Relating to Alternatives

Based on the evaluation and analysis of Project alternatives set forth in Chapter 5 of the DEIR, 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 5-6 to 5-12 of the DEIR. The No Project is hereby rejected because it would not meet or would not meet as fully most of the City's objectives for the proposed Project.*

Explanation. Under the No Project Alternative, development would occur within the Planning Area but only in the locations and at the densities allowed or anticipated under the 2010 General Plan. The proposed policy changes associated with the Project, in particular the amendments

to the Housing, Built Environment (Land Use), Public Safety, Building Community, and Natural Resources Elements, and the Environmental Justice policies and programs would not occur.

With regard to aesthetics, the amount of development potential would be reduced with the No Project Alternative compared to the Project; however new development associated with the No Project Alternative could be taller and more dense than currently exists at certain locations. New development may result in an increase in the number of lighting sources and nighttime lighting within the area. Given that the area is already developed, such increases are not expected to be substantial. The No Project Alternative would result in a similar less-than-significant impact, when compared to the Project.

With regard to agriculture and forestry resources, the Planning Area is developed with urban and suburban uses and no land in the Planning Area is considered Prime Farmland, Farmland of Statewide Importance, or Unique Farmlands nor zoned for agricultural use. In addition, no Williamson Act contracts exist. There is no Timberland, land zoned for Timberland Production, or forest land. The No Project Alternative would result in a similar no impact, when compared to the Project.

With regard to air quality, the No Project Alternative would not result in operational emissions that exceed BAAQMD regional CEQA thresholds and would comply with all relevant AQP control measures. However, the No Project Alternative's construction emissions may exceed BAAQMD thresholds. Further, the No Project Alternative would not provide Environmental Justice policies that work to lessen air quality impacts on disadvantaged communities. The No Project Alternative is considered to have a reduced impacts than the Project, but they would remain significant and unavoidable.

With regard to biological resources, the Planning Area contains suitable habitat for special status plant and wildlife species, which applies to both the Project and the No Project Alternative. However, the potential for residential development under the No Project Alternative would be reduced. In addition, several proposed Public Safety Element policies and programs which have been identified as possibly having impacts will not occur, and thus, the possible biological resources impacts associated with these policies will not occur. Therefore, the No Project Alternative would result in fewer impacts than the Project due to the reduced development potential.

With regard to cultural resources, development under the No Project Alternative could uncover previously unknown cultural resources or destroy/change structures that could be considered historic, however, General Plan policies require that development or land use proposals with the potential to disturb or destroy sensitive cultural resources need to be evaluated by a qualified professional and, if necessary, incorporate mitigation measures into project approvals. This Alternative would result in a similar less-than-significant impact, when compared to the Project with adherence to existing regulations.

With regard to energy, development potential associated with the No Project Alternative would require the consumption of electricity, natural gas, and vehicle fuel resources to accommodate growth, however, the No Project Alternative would have reduced energy

consumption because potential residential development is less. The No Project Alternative would result in reduced less-than-significant impacts compared to the Project due to the decreased development potential.

With regard to geology and soils, the No Project Alternative would result in geology and soils impacts similar to those of the Project because both would be exposed to the same existing geologic conditions within the City. Existing building requirements would still be applicable under the No Project Alternative, and future projects would still be required to be designed and constructed in compliance with all applicable City and State codes and requirements. However, new policies associated with the Public Safety Element's update would not be in place and not available to mitigate climate change/resiliency possible impacts. As such, the No Project Alternative's impacts would possibly be significant and require mitigation.

With regard to greenhouse gas emissions, the Project would result in a less-than-significant greenhouse gas (GHG) emissions impact, and the less-than-significant impact of the No Project Alternative would be reduced further due to the decrease in development potential.

With regard to hazards and hazardous materials, the No Project Alternative would reduce the less-than-significant impact because the No Project Alternative provides for fewer housing units, thereby decreasing the number of residents possibly exposed to hazardous materials transport, use, or disposal. The No Project Alternative would not increase possible hazard emissions nor the handling of hazardous materials within one-quarter mile of a school. The No Project Alternative would subject fewer potential residents to airport safety hazards and related noise than the Project because the residential development potential is lower. The No Project Alternative would result in reduced less-than-significant impacts compared to the Project due to the reduced development potential.

With regard to hydrology and water quality, though the No Project Alternative assumes a population increase that would be less than the Project, the No Project Alternative would be subject to all existing water quality regulations and programs and would result in reduced less-than-significant impacts compared to the Project due to the reduced development potential.

With regard to land use and planning, the No Project Alternative would not physically divide an established community, similar to the Project. The potential development is consistent with the Plan Bay Area 2050 because the Plan's growth projection uses RHNA allocation as its base, and the No Project Alternative meets the growth projection. The No Project Alternative would have similar less-than-significant impacts compared to the Project.

With regard to mineral resources, the Planning Area is designated as having little potential for development of mineral resources. The No Project Alternative would have a similar, no impact on mineral resources when compared with the Project.

With regard to noise, mitigation measures would still be required for development to ensure that train ground vibration and vibration noise is mitigated for residential projects within 200' and commercial projects within 120' of the rail track. However, due to the reduction in development potential of the No Project Alternative, the number of units possibly impacted by train ground

shaking would be reduced, and noise impacts compared with the Project would be reduced but still remain less-than-significant with mitigation.

With regard to population and housing, the No Project Alternative has a reduced potential of residential development and population growth compared to the Project; this alternative's impacts, when compared with the Project, would be reduced and remain less-than-significant.

With regard to public services, No Project Alternative would result in decreased development potential and a decreased number of residents, resulting in lower demand for public services compared to the Project. The No Project Alternative's public service impacts, when compared with the Project, would be reduced, and would remain less-than-significant.

With regard to recreation, although the No Project Alternative would result in a reduced number of potential housing units and associated population growth, which would result in less demand for recreational facilities compared to the Project, any residential development project will be required to provide a dedication of parkland or pay the in-lieu park fees. As such, the No Project Alternative would result in reduced less-than-significant impacts than the Project due to the decreased development potential.

With regard to transportation, although the No Project Alternative reduces the development potential, the potential residential units are located throughout Redwood City and as such, increased VMT would continue under the No Project Alternative. The No Project Alternative would result in a reduced VMT impact, compared to the project, however, the impact would remain significant and unavoidable.

With regard to tribal cultural resources, compliance with existing regulations would ensure that potential impact would be reduced both for the Project and the No Project Alternative; therefore, this alternative would result in a similar less-than-significant impact when compared to the Project.

With regard to utilities and service systems, the Project will have a less-than-significant impacts related to sewer/wastewater treatment, storm drainage, and other utility services, and would not require nor result in the relocation or construction of new or expanded water, wastewater treatment of storm water drainage, electric power, natural gas, or telecommunication facilities. The Project will not have an impact on water supply. The Project would also not generate solid waste in excess of State or local standards nor in excess of local infrastructure capacity, would not impair attaining solid waste reduction goals, and would comply with federal, state, and local solid waste management/reduction statutes and regulations. The No Project Alternative would result in a decrease in residential development potential compared to the Project, therefore, the demand for utilities and their service systems would be reduced as well and this alternative would result in fewer impacts than the Project, though all would remain less than significant.

With regard to wildfire impacts, existing General Plan policies, including identifying special on-site fire protection measures during project review, would continue to apply, however, the additional wildfire policies contained within the proposed Public Safety Element would not be

implemented and as such, the No Project Alternative could result in possible significant impacts compared to the Project.

The No Project Alternative would meet many of the City’s objectives for the proposed Project, but in some cases not as well as the Project, in that it would:

- provide for housing opportunities throughout Redwood City including areas close to services, transit, jobs, and in high opportunity residential neighborhoods;
- promote healthy neighborhoods but would not provide a robust program addressing racial equity environmental justice issues facing Redwood City today; and
- support inclusivity and safety objectives.

The No Project Alternative would not meet the following City objectives:

- not accommodate as much residential development as the Project. The No Project Alternative only provides a buffer of 13 percent to ensure there is no net loss of lower-income units when HCD recommends a buffer of between 15 and 30 percent, while the Project would provide a 53% buffer;
- provide fewer housing choices in Redwood City and fewer opportunities to respond to the broad range of housing needs in the community;
- not address challenges facing disadvantaged and vulnerable communities related to Environmental Justice issues and would not result in goals and policies designed to reverse historic patterns of segregation;
- not address new State laws and guidelines established to address pollution burdens and locate affordable housing in communities with high value resources (e.g., high performing schools, access to parks, etc.); although the adopted 2010 General Plan incorporates policies and programs addressing environmental justice issues, recent State laws require additional focus that is not provided in the current General Plan;
- not afford the community an opportunity to provide input related to trends, changed conditions and needs that should be addressed when addressing housing, safety, or environmental justice issues; there would be no opportunities to engage residents, stakeholders, vulnerable and disadvantaged communities to ensure an equitable and inclusive processes for collecting input on goals, policies, investments, and service systems;
- not update the Public Safety Element to incorporate information, goals, policies, and programs to address climate change, resiliency, sea level rise, flooding, and wildfire risk as required by State Law; and would not meet the City’s goals and objectives established for the Safety Element Update;
- not develop strategies that help people, infrastructure, and community assets adapt to and recover from evolving climate threats and vulnerabilities, and from natural and human-caused hazards as required by State Law; and would not meet the City’s objective established for adaptive and resilient communities; and

- not develop a Safety Element that meets all the requirements under Government Code Section 65302(g), and which reflects State and local regulations for specific hazards, with the intent of protecting people and key infrastructure from damage resulting from an environmental hazard as required by recently passed State Law.

Findings Relating to the RHNA +15% Residential Buffer Alternative

Findings. *The RHNA +15% Residential Buffer Alternative is described and discussed on pages 5-13 to 5-17 of the DEIR. The RHNA +15% Residential Buffer Alternative would not provide as many housing opportunities as the Project and, consequently, the New Housing and Housing Choice objectives are better met by the proposed Project because the proposed Project locates more housing in places close to services, transit, and jobs and in existing high opportunity residential neighborhoods. In addition, this Alternative would not include any of the updated goals and policies in the Housing, Public Safety, Built Environment elements, and the Environmental Justice policies as proposed by the Project.*

Explanation. Under the RHNA +15% Residential Buffer Alternative, residential development opportunities (5,276 units) would exceed the City's 6th Cycle RHNA (4,588 units) by 15 percent. This Alternative assumes that policies and goals associated with the proposed Built Environment Element (Urban Form and Land Use Chapter), Housing Element, Public Safety Element, and the Environmental Justice policies and programs, would apply.

With regard to aesthetics, the amount of residential development potential would be reduced by 38 percent compared to the Project. As with the Project, aesthetic impacts are anticipated to be less-than-significant, however new development associated with the RHNA +15% Residential Buffer Alternative could be taller and more dense than currently exists at certain locations, though the new development would be consistent with the urban character. New development may result in an increase in the number of lighting sources and nighttime lighting within the area; however, given that the area is already developed, such increases are not expected to be substantial. The RHNA +15% Residential Buffer Alternative would result in a similar less-than-significant impact, when compared to the Project.

With regard to agriculture and forestry resources, the Planning Area is developed with urban and suburban uses and no land in the Planning Area is considered Prime Farmland, Farmland of Statewide Importance, or Unique Farmlands nor zoned for agricultural use. In addition, no Williamson Act contracts exist. There is no Timberland, land zoned for Timberland Production, or forest land. As with the Project, this alternative would have a similar no impact on agriculture and forestry resources.

With regard to air quality, the RHNA +15% Residential Buffer Alternative decreases the development potential when compared to the Project; however, it is likely that air quality mitigation measures needed for the Project would also be required for this Alternative. Construction emissions may exceed BAAQMD thresholds; the RHNA +15% Residential Buffer Alternative would still provide policy to reduce air quality impacts on disadvantaged communities. The RHNA +15% Residential Buffer Alternative is considered to have reduced impacts but they would remain significant and unavoidable, when compared with the Project.

With regard to biological resources, the Planning Area contains suitable habitat for special status plant and wildlife species, which applies to both the Project and the RHNA +15% Residential Buffer Alternative. While the potential for residential development under the RHNA +15% Residential Buffer Alternative is reduced, all future development projects would be required to adhere to existing regulations. This alternative would result in reduced less-than-significant impacts than the Project due to the decreased development potential.

With regard to cultural resources, development under the RHNA +15% Residential Buffer Alternative could uncover previously unknown cultural resources or destroy/change structures that could be considered historic. Development under this alternative would not result in a substantial adverse change in the significance of a historical resource because they are currently protected under both existing and proposed policies. The RHNA +15% Residential Buffer Alternative would result in a similar less-than-significant impact, when compared to the Project with adherence to existing regulations and the proposed General Plan Update policies.

With regard to energy, development would require the consumption of electricity, natural gas, and vehicle fuel resources to accommodate growth. Potential development under the RHNA +15% Residential Buffer Alternative is less than the Project and would have reduced energy consumption compared to the Project. This alternative would result in reduced less-than-significant impacts than the Project due to the decreased development potential.

With regard to geology and soils, the RHNA +15% Residential Buffer Alternative would result in geology and soils impacts similar to those of the Project because both would be exposed to the same existing geologic conditions within the City. Potential development under this alternative would be exposed to the same existing geologic conditions. Existing building requirements would be applicable under this alternative. And all future projects would be required to be designed and constructed in compliance with all applicable City and State codes and requirements. The RHNA +15% Residential Buffer Alternative would result in a similar less-than-significant impact, when compared to the Project.

With regard to greenhouse gas emissions, the Project would result in a less-than-significant greenhouse gas (GHG) emissions impact. Overall GHG emissions associated with the RHNA +15% Residential Buffer Alternative would be slightly reduced compared to the Project due to the decrease in development potential. This alternative would result in reduced less-than-significant impacts than the Project due to the decreased development potential.

With regard to hazards and hazardous materials, the amount and use of hazardous chemicals present during construction under the RHNA +15% Residential Buffer Alternative would be limited, would be required to comply with existing government regulations, and would not be considered a significant hazard. Future development under this alternative would be subject to the City's standard environmental review, including identification of any contaminated sites, and this alternative would therefore result in a similar less-than-significant impact when compared to the Project.

With regard to hydrology and water quality, development under the RHNA +15% Residential Buffer Alternative would be subject to all existing water quality regulations and

programs and would result in reduced less-than-significant impacts compared to the Project due to the reduced development potential.

With regard to land use and planning, the RHNA +15% Residential Buffer Alternative would be similar to the Project and would not physically divide an established community. The potential development is consistent with the Plan Bay Area 2050 as it meets RHNA (the base for the Plan's growth projection). This alternative's impacts are similar to the Project and would remain less-than-significant.

With regard to mineral resources, the Planning Area is designated as having little potential for development of mineral resources. The RHNA +15% Residential Buffer Alternative would have a similar no impact on mineral resources when compared with the Project.

With regard to noise, mitigation measures would still be required for development to ensure that train ground vibration and vibration noise is mitigated for residential projects within 200' and commercial projects within 120' of the rail track. However, fewer units will be impacted train ground shaking and noise, and this alternative would result in reduced less-than-significant impacts compared to the Project due to the decreased development potential.

With regard to population and housing, the RHNA +15% Residential Buffer Alternative would result in a decreased number of potential housing units and population growth compared to the Project. although the development potential would continue to satisfy RHNA. Given the reduction in population and housing potential, this alternative would also continue to satisfy the Plan Bay Area 2050 but not as well as the Project. This alternative would result in a similar less-than-significant impact, when compared to the Project.

With regard to public services, the RHNA +15% Residential Buffer Alternative would result in decreased development potential and a decreased number of residents, resulting in lower demand for public services compared to the Project. The decreased development potential and decreased number of residents is anticipated to result in less demand for public services compared to the Project. This alternative's public service impacts, when compared with the Project, would be reduced, and remain less-than-significant.

With regard to recreation, although the RHNA +15% Residential Buffer Alternative would result in a reduced number of potential housing units and associated population growth, which would result in less demand for recreational facilities compared to the Project, any residential development project will be required to provide a dedication of parkland or pay the in-lieu park fees. As such, the RHNA +15% Alternative would result in reduced less-than-significant impacts than the Project due to the decreased development potential.

With regard to transportation, although the RHNA +15% Residential Buffer Alternative reduces the development potential, and the alternative would result in similar less-than-significant impacts compared to the project; however, because the potential residential units are located throughout Redwood City, the VMT impact under the alternative, though somewhat reduced, would remain significant and unavoidable.

With regard to tribal cultural resources, compliance with existing regulations would ensure that potential impact would be reduced both for the Project and the RHNA +15% Residential Buffer Alternative; therefore, this alternative would result in a similar less-than-significant impact when compared to the Project.

With regard to utilities and service systems, the Project will have a less-than-significant impacts related to sewer/wastewater treatment, storm drainage, and other utility services, and would not require nor result in the relocation or construction of new or expanded water, wastewater treatment of storm water drainage, electric power, natural gas, or telecommunication facilities. The Project will not have an impact on water supply. The Project would also not generate solid waste in excess of State or local standards nor in excess of local infrastructure capacity, would not impair attaining solid waste reduction goals, and would comply with federal, state, and local solid waste management/reduction statutes and regulations. Given that the RHNA +15% Residential Buffer Alternative has a decrease in residential development potential, the demand for utilities and their service systems would be reduced as well. This alternative would result in fewer impacts than the Project and the potential for impact would remain less than significant.

With regard to wildfire impacts, existing General Plan policies, including identifying special on-site fire protection measures during project review, would continue to apply, thus providing the same level of protection as the Project. This Alternative would result in reduced less-than-significant impacts than the Project due to the decreased development potential.

The RHNA +15% Residential Buffer Alternative would meet many of the City's objectives for the proposed Project but not meet them as fully as the Project, in that it would:

- accommodate a buffer of 15 percent, consistent with the HCD recommended buffer between 15 and 30 percent to ensure there is no net loss of lower-income units. However, the Project provides more opportunity for housing, thus the RHNA +15% Alternative supports the objective but not as well as the Project; and
- provide for housing opportunities throughout Redwood City including areas close to services, transit, jobs, and in high opportunity residential neighborhoods. However, the Project provides more opportunity for housing, and thus the RHNA +15% Alternative supports the objective but not as well as the Project;

The RHNA +15% Residential Buffer Alternative would meet and/or support many of the City's objectives for the proposed Project equally well:

- meet the objective promoting healthy neighborhoods;
- support the equity, fair housing, and inclusivity objectives;
- supports the safety objective;
- meet the adaptive and resilient communities objective; and
- meet the conformance with regulatory requirements objective.

Findings Relating to the Consolidated Housing Sites - Downtown Alternative

Findings. *The Consolidated Housing Sites - Downtown Alternative is described and discussed on pages 5-18 to 5-23 of the DEIR. The Consolidated Housing Sites - Downtown Alternative assumes a reduction in residential development potential within the Planning Area. This alternative assumes the Public Safety Element and the Environmental Justice policies will apply. The Consolidated Housing Sites-Downtown Alternative is proposed as a possible scenario that may reduce the air quality and transportation impacts associated with the Project's VMT. It is important to note that the unit count associated with this Alternative will not comply with RHNA and thus, does not comply with State law.*

Explanation. The Consolidated Housing Sites - Downtown Alternative assumes that Housing Element residential development potential would be restricted to the Downtown area, which would result in a reduction in residential and population potential from the Project. The Consolidated Housing Sites – Downtown Alternative will provide an additional development potential of 1,534 units (though less than the Project or the other two alternatives). This Alternative assumes some of the proposed changes to the Built Environment Element (Urban Form and Land Use Chapter) will not occur – specifically, the increased density for the Mixed Use designations and the redesignation of parcels along Woodside Road would not occur – however, the proposed changes to the Public Safety Element and the Environmental Justice policies will be applied.

With regard to aesthetics, the Consolidated Housing Sites - Downtown Alternative assumes the amount of residential development potential would be reduced by 23 percent compared to the Project. As with the Project, aesthetic impacts are anticipated to be less-than-significant. The southern and western scenic vistas will be unchanged. Impacts to scenic resources would not occur because this alternative, like the Project, would not allow for development that is inconsistent with State and local regulations covering architecturally distinctive/historic buildings or historic points of interest. New development may result in an increase in the number of lighting sources and nighttime lighting within the area; however, given that the area is already developed, such increases are not expected to be substantial. The Consolidated Housing Sites - Downtown Alternative would result in a similar less-than-significant impact, when compared to the Project.

With regard to agriculture and forestry resources, the Planning Area is developed with urban and suburban uses and no land in the Planning Area is considered Prime Farmland, Farmland of Statewide Importance, or Unique Farmlands nor zoned for agricultural use. In addition, no Williamson Act contracts exist. There is no Timberland, land zoned for Timberland Production, or forest land. This alternative would have a similar no impact on agriculture and forestry resources as the Project.

With regard to air quality, the Consolidated Housing Sites - Downtown Alternative would decrease the amount of development potential when compared to the Project; however, it is likely that air quality mitigation measures needed for the Project would also be required for this alternative. Air quality related to construction emissions may also exceed BAAQMD thresholds, however, the Consolidated Housing Sites – Downtown Alternative would still provide policy to reduce air quality impacts on disadvantaged communities. The Consolidated Housing Sites –

Downtown Alternative is considered to have reduced impacts but they would remain significant and unavoidable.

With regard to biological resources, the Planning Area contains suitable habitat for special status plant and wildlife species, which applies to both the Project and the Consolidated Housing Sites – Downtown Alternative. The potential for residential development under this alternative would be reduced and would be moved further away from the potential biological resources east of U.S. 101 and in the foothills. All future projects under this alternative would be required to adhere to existing regulations, and this Alternative would result in a reduced less-than-significant impact when compared to the Project.

With regard to cultural resources, development under the Consolidated Housing Sites – Downtown Alternative could uncover previously unknown cultural resources or destroy/change structures that could be considered historic. Development under this alternative would not result in a substantial adverse change in the significance of a historical resource because they are currently protected under both existing and proposed policies. The Consolidated Housing Sites – Downtown Alternative would result in a similar less-than-significant impact, when compared to the Project with adherence to existing regulations and the proposed General Plan Update policies.

With regard to energy, development would require the consumption of electricity, natural gas, and vehicle fuel resources to accommodate growth. Potential development under the Consolidated Housing Sites – Downtown Alternative would have reduced energy consumption compared to the Project. This alternative would result in reduced less-than-significant impacts than the Project due to the decreased development potential.

With regard to geology and soils, the Consolidated Housing Sites – Downtown Alternative would result in geology and soils impacts similar to those of the Project because both would be exposed to the same existing geologic conditions within the City. Potential development under this alternative would be exposed to the same existing geologic conditions. Existing building requirements would be applicable under this alternative. And all future projects would be required to be designed and constructed in compliance with all applicable City and State codes and requirements. The Consolidated Housing Sites – Downtown Alternative would result in a similar less-than-significant impact, when compared to the Project.

With regard to greenhouse gas emissions, the Project would result in a less-than-significant greenhouse gas (GHG) emissions impact. Overall GHG emissions associated with the Consolidated Housing Sites - Downtown Alternative would be reduced compared to the Project due to the decrease in development potential. This Alternative would result in reduce less-than-significant impacts, when compared with the Project.

With regard to hazards and hazardous materials, the amount and use of hazardous chemicals present during construction under the Consolidated Housing Sites - Downtown Alternative would be limited, would be required to comply with existing government regulations, and would not be considered a significant hazard. Future development under this alternative would be subject to the City's standard environmental review, including identification of any

contaminated sites, and this alternative would therefore result in a similar less-than-significant impact when compared to the Project.

With regard to hydrology and water quality, development under the Consolidated Housing Sites - Downtown Alternative would be subject to all existing water quality regulations and programs. The potential development associated with this alternative is less than the Project; as such, possible hydrology and water quality impacts associated with development levels (such as amount of impervious surfaces and anticipated runoff) would be reduced when compared to the Project. The Consolidated Housing Sites - Downtown Alternative would have a reduced less-than-significant impact when compared with the Project.

With regard to land use and planning, the Consolidated Housing Sites - Downtown Alternative would be similar to the Project and would not physically divide an established community. The potential development in this alternative is 1,534 units, which is below the required RHNA. As such, the development potential is also below the Plan Bay Area 2050 growth projections because the Plan uses RHNA allocations as its base. This would have an increased land use and planning impacts when compared with the Project because this alternative does not support the Plan Bay Area 2050.

With regard to mineral resources, the Planning Area is designated as having little potential for development of mineral resources. The Consolidated Housing Sites - Downtown Alternative would have a similar no impact on mineral resources when compared with the Project.

With regard to noise, mitigation measures would still be required for development to ensure that train ground vibration and vibration noise is mitigated for residential projects within 200' and commercial projects within 120' of the rail track. However, Fewer units will be impacted by freight train ground shaking and noise. The Consolidated Housing Sites - Downtown Alternative would result in reduced less-than-significant impacts than the Project due to the decreased number of units impacted by the ground shaking and noise.

With regard to population and housing, the Consolidated Housing Sites - Downtown Alternative would result in 5,469 fewer potential housing units and an anticipated reduced population growth compared to the Project. Given the decrease, this alternative would not satisfy Plan Bay Area 2050 and would not satisfy the 6th Cycle RHNA, thus not meet State law. When compared with the Project, this Alternative would increase population and housing impacts, which would be significant and unavoidable because the RHNA and State law are not met.

With regard to public services, the Consolidated Housing Sites - Downtown Alternative would result in decreased development potential and a decreased number of residents, resulting in lower demand for public services compared to the Project. The decreased development potential and decreased number of residents is anticipated to result in less demand for public services compared to the Project. This alternative's public service impacts, when compared with the Project, would be reduced, less-than-significant.

With regard to recreation, although the Consolidated Housing Sites - Downtown Alternative would result in a reduced number of potential housing units and associated population

growth, which would result in less demand for recreational facilities compared to the Project, all residential development projects will be required to provide a dedication of parkland or pay the in-lieu park fees; as such, the Consolidated Housing Sites – Downtown Alternative would result in fewer impacts than the Project due to the reduced development potential and remain less-than-significant when compared with the Project.

With regard to transportation, although the Consolidated Housing Sites - Downtown Alternative reduces the development potential, and the alternative would result in similar less-than-significant impacts compared to the project. This alternative reduces the development potential, however, the potential residential units are focused in the Downtown area adjacent to transit. As such, the increased VMT would continue under the Consolidated Housing Sites – Downtown Alternative. This Alternative would result in fewer impacts compared to the Project; however, they would remain significant and unavoidable.

With regard to tribal cultural resources, compliance with existing regulations would ensure that potential impact would be reduced both for the Project and the Consolidated Housing Sites – Downtown Alternative; therefore, this alternative would result in a similar less-than-significant impact when compared to the Project.

With regard to utilities and service systems, the Project will have a less-than-significant impacts related to sewer/wastewater treatment, storm drainage, and other utility services, and would not require nor result in the relocation or construction of new or expanded water, wastewater treatment of storm water drainage, electric power, natural gas, or telecommunication facilities. The Project will not have an impact on water supply. The Project would also not generate solid waste in excess of State or local standards nor in excess of local infrastructure capacity, would not impair attaining solid waste reduction goals, and would comply with federal, state, and local solid waste management/reduction statutes and regulations. Given this that the Consolidated Housing Sites – Downtown Alternative has a decrease in residential development potential, the demand for utilities and their service systems would be reduced as well. This alternative would result in reduced impacts as compared to the Project; however, they would remain less than significant.

With regard to wildfire impacts, existing General Plan policies, including identifying special on-site fire protection measures during project review, would continue to apply, thus providing the same level of protection as the Project. This Alternative would result in a similar less-than-significant impact compared to the Project.

The Consolidated Housing Sites – Downtown Alternative would meet many of the City’s objectives for the proposed Project in that it would:

- address healthy neighborhoods;
- address challenges facing disadvantaged and vulnerable communities related to Environmental Justice issues and result in goals and policies designed to reverse historic patterns of segregation;
- support the fair housing and inclusivity objectives;

- support the safety and adaptive and resilient communities objectives; and
- support the conformance with regulatory requirements objective.

The Consolidated Housing Sites – Downtown Alternative would meet the following City objectives for the proposed Project but not meet it as fully as the Project, in that it would:

- not meet housing needs through a variety of housing choices because it provides for fewer housing choices. Further, it responds to the broad range of housing needs in City by supporting a mix of housing types, densities, affordability levels, and designs but not as well as the Project because it provides fewer housing opportunities.

The Consolidated Housing Sites – Downtown Alternative would not meet the following City objective for the proposed Project:

- support residential development potential of 1,534 units, which is significantly less than required by the City’s 6th Cycle RHNA (4,588 units) and provides no buffer to ensure there is no net loss of lower-income units. Therefore, this alternative fails to meet the New Housing Project Objective.

Environmentally Superior Alternative

The CEQA Guidelines (section 15126[e][2]) stipulate, "If the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." Alternative 1 (No Project) and Alternative 3 (Consolidated Housing Sites – Downtown) would result in reduced or similar less-than-significant impacts as the Project; however, they would not meet State laws regarding both the Public Safety and Housing elements. Alternative 2 (RHNA +15% Residential Buffer) is the only alternative that will comply with State law and the City’s objectives. Alternative 2 also reduces some of environmental impacts. As such the “environmentally superior alternative” is Alternative 2 (RHNA +15% Residential Buffer).

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 Project is the most desirable, feasible, and appropriate action. 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 Project’s benefits against its significant and unavoidable effects and states the specific reasons for its decision to approve the Project. Substantial evidence supports the various benefits and can be found in the preceding CEQA findings, which are incorporated by reference into this Statement, the FEIR, 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 Project outweigh its significant adverse environmental effects and is an overriding

consideration warranting approval. The City finds that the Project will have the following economic, social, technological, and environmental benefits:

1. **Meet Regional Housing Needs Allocation.** The Project promotes development in a manner that would accommodate anticipated population growth for the City and existing unmet need for housing, as required by the City's 6th Cycle Regional Housing Needs Allocation (RHNA) and in a manner consistent with the City's General Plan and Plan Bay Area 2050, prepared by ABAG/MTC. The City is mandated, pursuant to State Housing Element law, to plan for and accommodate the RHNA of 4,588 units as part of the 2022-2030 Housing Element. The RHNA, prepared by HCD and ABAG, reflects the number of housing units that must be provided to meet the forecasted population growth and the need for housing among the existing population. The Project accommodates this population by incorporating goals, objectives, policies and programs, as well as zoning amendments, to accommodate build-out of the RHNA.
2. **Compliance with State Housing Element Requirements.** State law requires the City to adopt the Housing Element. HCD has determined that the revised draft Housing Element meets the statutory requirements of State Housing Element Law (Article 10.6 of Gov. Code). The Project complies with State Housing Element requirements, and adoption of the Project would ensure the City maintains Housing Element compliance. Jurisdictions that fail to adopt a compliant Housing Element by the statutory deadline face potential loss of eligibility for certain state and federal funding programs for affordable housing in addition to other penalties that may be imposed by a court or potentially under the Housing Accountability Act (Government Code Section 65589.5(d)), such as potential limiting of some of the City's land use authority. Additionally, failure to adopt the Housing Element Update within 120 days from the statutory adoption date has an additional consequence of decreasing the planning period from an 8-year period to a 4-year update period (Government Code Section 65588(e)(4)).
3. **Compliance with Assembly Bill 686.** The Project complies with Assembly Bill (AB) 686, which requires that the City's Housing Element affirmatively furthers fair housing. The implementation programs included in the Housing Element Update are anticipated to provide meaningful action to overcome patterns of segregation and foster inclusive communities, helping to address significant existing disparities in housing needs and access to opportunity, replace segregated living patterns with truly integrated and balanced living patterns, transform racially and ethnically concentrated areas of poverty into areas of opportunity, and foster and maintain compliance with civil rights and fair housing laws. This is achieved by increasing housing opportunities in higher resource areas and the Project's goals, objectives, policies, and programs related to removing barriers to production of affordable housing in high resource areas and areas near transit, anti-displacement and housing preservation strategies, and fair housing compliance.
4. **Consistency with State General Plan Requirements.** The Project is consistent with state General Plan requirements, which require the update of the Safety Element Update alongside the update to the Housing Element, as well as compliance with environmental

- justice requirements. The Project provides focused updates to the Public Safety Element of the General Plan to clarify the City's compliance with state requirements related to disaster risk, hazards and hazard abatement, flooding, wildfires, emergency evacuation, climate change, and environmental justice, including SB 1000. The City reviewed hazard data to ensure the Project would minimize risk of new development in hazard prone areas. The Project directs new higher intensity housing development away from hazard prone areas and requires hazards to be mitigated where risk is present. The Project also anticipates the risks anticipated by climate change and includes policies and programs to continue to plan for and address such risks, with particular focus on identifying and engaging communities most vulnerable to prepare and respond to those risks.
5. **Consistency with SB 375.** The Project is consistent with Senate Bill 375. The Project supports a condensed housing development pattern within close proximity to public transit, along major corridors, near job centers, and in higher resource areas, consistent with Senate Bill 375 and Plan Bay Area 2050, and therefore, would contribute to decreasing regional vehicle miles traveled and mobile-source GHG emissions in the region.
 6. **Consistency with Plan Bay Area 2050.** The Project is consistent with Plan Bay Area 2050 and would contribute to increasing mobility and sustainability. The Project would contribute to reducing regional traffic and commute times by focusing the creation of new housing capacity in close proximity to major transit stations and employment destinations, in addition to higher resource areas. The Project supports housing development where new residential development can be supported by transportation infrastructure.
 7. **Respond to Regional Housing and Homelessness Crisis.** The Project responds to the regional housing and homelessness crisis and the corresponding increasing cost of housing in the City of Redwood City by providing a comprehensive 8-year strategy to meet the City's housing needs through the build-out of the RHNA. The Project incorporates goals, objectives, policies, and programs that promote the creation of an ample supply of housing, in particular affordable housing, provides greater housing stability for households of all income levels, and commits to compassionate solutions to homelessness prevention and response.
 8. **Include Broad Community Involvement in Planning.** The Project is the product of a comprehensive public planning effort that includes community and public input, the Planning Commission, and the City Council in order to address prevailing neighborhood, community, citywide, and regional issues while complying with state General Plan law. The policies and programs for the Project are based on public input, as well as collaboration with other City departments, city stakeholders, and other governmental agencies, including HCD and CAL FIRE.