



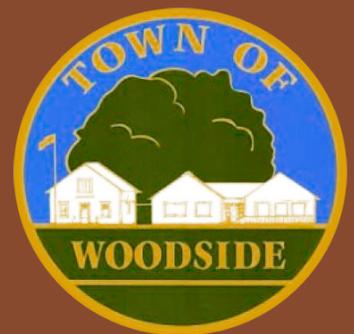
Town of Woodside Housing Element Update Environmental Impact Report

PUBLIC REVIEW DRAFT

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Volume 1

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Public Review Draft

Prepared for the Town of Woodside

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Executive Summary

This Draft Environmental Impact Report (EIR) evaluates the potential impacts of the proposed General Plan Housing Element Update, referred to as the “Proposed Project,” in the Town of Woodside, located in San Mateo County, California. The Proposed Project is both a policy document and an implementation tool for implementing the Town’s General Plan. It contains goals, policies, and programs to guide future housing development within the approximately 11.8-square-mile Planning Area that encompasses the entire town. Implementation will include amendments to the Town’s Zoning Ordinance. The Town is the Lead Agency for environmental review, as defined by the California Environmental Quality Act, Public Resources Code Section 21000, *et seq.* (CEQA).

An EIR is intended to inform decision-makers and the general public about the potential significant environmental impacts of a proposed project. The EIR also considers mitigation measures to minimize significant impacts and evaluates feasible alternatives to the Proposed Project that may reduce or avoid one or more significant environmental impacts. Based on the alternatives analysis, the EIR identifies an environmentally superior alternative.

This EIR is a program EIR that examines the potential effects resulting from implementing designated land uses, goals, and policies in the Proposed Project. The impact assessment evaluates the Proposed Project as a whole and identifies the broad, area-wide, and regional effects that may occur with implementation. As a programmatic document, this EIR does not assess project-specific impacts that may result from developments pursuant to the Proposed Project. To the extent that any future development project made possible by the Proposed Project may have individual, site-specific impacts not addressed in this program EIR, such projects would be subject to separate, project-level environmental review, as required by State law. Projects consistent with the Proposed Project and the findings of this EIR may also be eligible for streamlined environmental review as permitted under CEQA. This EIR represents the Town’s best effort to evaluate the implementation and buildout of the Proposed Project through its horizon year of 2031. While it is anticipated that conditions may change, the assumptions used are the best available at the time of preparation and reflect existing knowledge of patterns of development.

1.1 Proposed Project

The Proposed Project involves updates to the Town of Woodside General Plan Housing Element. In compliance with State law, the Housing Element is being updated to account for changing demographics, market conditions, and projected housing need over an eight-year planning period that runs from 2023 through 2031.

This Housing Element touches many aspects of community life. It builds upon the goals, policies and implementing programs contained in the Town's 2015-2023 Housing Element and other Town policies and practices to address housing needs in the community. The overall focus of the Housing Element is to preserve and enhance community life, character, and serenity through the provision of adequate housing opportunities for people at all income levels, while being sensitive to the unique and historic character of Woodside that residents know and love. The objectives of the Proposed Project, included below, inform the policies and implementing actions of the Proposed Project. A full project description is included in Chapter 2 of this Draft EIR.

PLANNING AREA

The Planning Area is comprised of the entire Town of Woodside, located in east San Mateo County and approximately 32 miles south of San Francisco. Home to 5,131 residents, the Town of Woodside is the third smallest jurisdiction in San Mateo County, encompassing 11.8 square miles. The town is composed largely of single-family homes and open space uses, with some limited local-serving commercial uses. Institutional, public, and quasi-public land uses in Town include Woodside Elementary School, a fire station, Woodside Library, a church, local government buildings, and a museum. Agriculture, including production of food and fiber products, livestock pasturing, vineyards, and beekeeping, is permitted on most lands within the Town. The wooded slopes and stream corridors of the Santa Cruz Mountains form the western backdrop to the town, while the central part of Woodside is characterized by gentle oak and grassland foothills, as well as flatter valley areas with rich riparian habitat.

PROJECT OBJECTIVES

The following are some of the specific purposes of the Housing Element update:

- **Guiding Principle 1:** Provide adequate housing for all persons regardless of race, color, ancestry/national origin, religion, income, age, disability, sex, sexual orientation, gender identity or expression, genetic information, marital status, familial status, military, or veteran status, and/or source of income.
- **Guiding Principle 2:** Assure a variety of housing types within the context of the Town's General Plan and existing physical constraints.
- **Guiding Principle 3:** Integrate new housing types while maintaining the Town's rural character and equestrian heritage.
- **Guiding Principle 4:** Provide opportunities for housing to meet the needs of those families and individuals who wish to live in a rural setting—in quiet residential areas which provide privacy, separation from traffic, undisturbed terrain, extensive vegetation, and opportunities to keep horses and other animals.
- **Guiding Principle 5:** Provide adequate and safe housing for households of varied income levels.
- **Guiding Principle 6:** Allow housing development that is subordinate, sensitive, and complementary to the natural environmental setting and specific site conditions, including sites designated and rezoned for medium to high density housing with full consideration of environmental/service constraints.

ESTIMATED BUILDOUT OF THE PROPOSED PROJECT

Buildout refers to the estimated amount of new development and corresponding growth in population that is likely to take place under the Proposed Project through the planning horizon year of 2031. Buildout estimates should not be considered a prediction for growth, as the actual amount of development that will occur through 2031 is based on many factors outside of the Town's control. Therefore, buildout estimates represent one potential set of outcomes rather than definitive figures. Amid the ongoing housing crisis in California, Woodside is required to plan for at least 328 new housing units between 2023 and 2031, including 90 Very Low Income units, 52 Low Income units, 52 Moderate income units, and 134 Above Moderate Income units.

As required by State law, the Draft Housing Element includes a map of sites available for housing and an inventory of capacity. The inventory demonstrates a total capacity of up to 423 new housing units, which is sufficient to meet the Town's RHNA obligations at all income levels with a buffer. The buffer is required to ensure that there is sufficient capacity to meet RHNA obligations during the planning period, in the event that some sites on the inventory develop at lower densities than envisioned. Implementation of the Draft Housing Element would primarily involve facilitation of smaller scale infill development in established residential neighborhoods, with some additional multi-family housing to provide varied housing types. Smaller-scale development includes vacant and underutilized single-family residences and development of accessory dwelling units (ADUs).

1.2 Areas of Known Controversy

During the drafting of the Proposed Project and this EIR, public agencies and members of the public were invited to provide feedback on the documents. The following topics were identified as areas of controversy, based on comments at public meetings on the Proposed Project and at the EIR Scoping Meeting, and responses to the Notice of Preparation (NOP):

AESTHETICS

Commenters expressed concern for potential development impacts on redwood trees, scenic roads and vistas, and town character. In addition, other concerns discussed the height of potential new development and general incompatibility between multi-family residential uses and the existing character of the Town. If development pursuant to the Proposed Project were to be oriented or scaled in such a way that views of the hillside area are blocked from specific locations in the Planning Area, a potentially significant impact could result.

TRANSPORTATION

Commenters expressed concern about development patterns that increase vehicular use, as well as subsequent congestion on arterials, noise, and greenhouse gas emissions. As detailed in Chapter 3.7, the Cumulative Scenario with the Proposed Project would generate daily home-based VMT per resident of 24.8, which represents a reduction of 4.6 percent from the baseline Town average of 26.0. Project generated home-based VMT per resident of 24.8 would be higher than the threshold of significance (22.1), and hence indicate that the Project would result in a potentially significant transportation impact requiring mitigation. As such, TDM measures are applied in Mitigation

Measures TRANS-1 and TRANS-2 with estimated VMT reductions per resident from 24.8 to 24.1, which remains above the threshold of significance (22.1). Due to the inability to determine that overall Project home-based residential VMT per capita can be reduced below the threshold of significance despite implementation of VMT reduction measures, the Project transportation-related impact is considered significant and unavoidable with mitigation.

UTILITIES

Commenters had concerns about the proximity of a PG&E gas pipeline to the High Road site, which could be a potential source of hazard if development occurs. In addition, concerns about the sewer line for the High Road site were discussed. Higher density housing described as part of the Proposed Project would be required to install new water mains within the street network to serve fire and domestic water needs. However, there are no specific projects proposed on these sites and accordingly the specific location and design details of any future development cannot be known at this time. At such time specific developments are proposed, if any project-specific impacts not identified and mitigated in this Draft EIR would result, subsequent project-level CEQA may be required. As such, compliance with existing regulations and implementation of Proposed Project policies would reduce impacts to the maximum extent practicable.

WILDFIRE

Commenters primarily had concerns about impacts on evacuation safety from development pursuant to the Proposed Project as well as any new development considering fire safety. Development associated with the Proposed Project would house additional residents in the Planning Area, making it necessary to evacuate more people in the event of a wildfire that affects the Town. However, there are numerous robust strategies in place from regional to local planning efforts focused on facilitating emergency responses and evacuations. In addition, any new development would be subject to comply with existing State and local codes, plans, and regulations, which would reduce impacts related to exacerbated wildfire risks, increased exposure to pollutant concentrations from a wildfire, and uncontrolled spread of wildfire to the maximum extent practicable.

1.3 Alternatives to the Proposed Project

The following alternatives are described and evaluated in Chapter 4 of this Draft EIR.

NO PROJECT ALTERNATIVE

Consistent with Section 15126.6(e)(2) of the CEQA Guidelines, the No Project Alternative represents what would be reasonably expected to occur in the foreseeable future if the Proposed Project were not adopted and the Town's current 2012 General Plan, including the 2015-2023 Housing Element, was left unchanged and in use. This Alternative would retain all current land use designations and policies from the 2012 General Plan as amended to date. There would be no changes to the current General Plan Land Use designations, no Zoning Code amendments, and no adoption of objective design and development standards.

Overall, the No Project Alternative (Current Town General Plan) has a total RHNA allocation of 62 units as detailed in the Town's 2015-2023 Housing Element. During this planning period, the Town met its RHNA Cycle 5 units and exceeded the target number of units by 63 units, for a total of 125 units constructed during the planning period. Under these conditions it would be reasonable to assume that applications for new housing developments consistent with the current Housing Element would continue to be submitted and approved at vacant and underutilized sites in Woodside. As such, there would be 105 vacant single-family sites, 44 non-vacant single-family sites, 75 multifamily units at Cañada College, and 120 ADUs that would be developed under this Alternative for a total of 344 new units. This would not be sufficient to meet the Town's lower income RHNA allocation. Additionally, none of the Housing Element programs would be updated and there would be no code revisions to ensure compliance with new State law. As such, the Housing Element would not be certified under the No Project Alternative and the basic project objectives, including meeting the Town's RHNA Cycle 6 assignment, would not be achieved.

Although the No Project Alternative does not meet any of the Housing Elements Update project objectives and is not considered a feasible project alternative, it is presented below as required by the State CEQA Guidelines.

INFILL ALTERNATIVE

This alternative would focus new multifamily housing on sites in the Town Center and Skylonda Center areas instead of on the Town-owned Raymundo Drive and High Road sites in order to reduce significant impacts related to VMT, traffic noise, operational GHG emissions that could result from the Proposed Project. The total number of housing units would be the same as under the Proposed Project, but new housing would be focused in areas with existing shops, restaurants, and services to foster a more walkable mix of uses and a more compact development pattern to help reduce vehicle trips and associated traffic noise and GHG emissions and better support regional and statewide GHG emissions reductions goals.

The General Plan land use designation applicable to the areas is Commercial, while the implementing zoning designation is Community Commercial. Neither currently permits housing, so to implement this alternative the Town would amend the existing designations to permit multifamily development at 20 du/ac in these areas. Buildout of this alternative would result in 15 multifamily apartments in the Skylonda Center area and 29 multifamily apartments in the Town Center area. Other sites in the inventory, including Canada College, would develop as under the Proposed Project and it is also projected that this alternative would result in 120 new ADUs during the planning period. Overall, this alternative would result in 423 new housing units, including 176 affordable to low and very low-income households, 65 affordable to moderate income households, and 182 affordable to above moderate households.

1.4 Impacts Summary and Environmentally Superior Alternative

IMPACTS SUMMARY

Table ES-1: Summary of Impacts and Mitigation Measures presents the summary of the significant impacts of the Proposed Project identified in the EIR, and the Proposed Project mitigation measures that reduce these impacts. Detailed discussions of the impacts and proposed policies and mitigation measures that reduce impacts are in Chapter 3.

IDENTIFICATION OF ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The CEQA Guidelines Section 15126.6 requires the identification of an environmentally superior alternative among the alternatives analyzed in an EIR. If the No Project Alternative is identified as the environmentally superior alternative, the guidelines require another environmentally superior alternative to be identified.

Table 4-1 summarizes the alternatives' overall environmental impacts for each topic presented in Section 4.3. For the Proposed Project, three impacts were expected to be significant and unavoidable, five impacts were expected to be less than significant with mitigation, 20 impacts were expected to be less than significant, and one impact was expected to have no impact.

For the No Project Alternative, similar to the Proposed Project, three impacts were expected to be significant and unavoidable, four impacts were expected to be less than significant with mitigation, 21 impacts were expected to be less than significant, and one impact was expected to have no impact. However, impacts would be marginally reduced for aesthetics, air quality and GHG emissions, special-status species, noise, utilities, and emergency response as compared to the Proposed Project, while impacts related to VMT would be more severe. For the Infill Alternative, four impacts were expected to be significant and unavoidable, five impacts were expected to be less than significant with mitigation, 19 impacts were expected to be less than significant, and one impact was expected to have no impact. However, impacts would be marginally reduced for scenic vistas and highways, special-status species, air quality and GHG emissions, and VMT as compared to the Proposed Project.

The No Project Alternative reduces the greatest number of environmental impacts. Since the CEQA guidelines require another environmentally superior alternative other than the No Project Alternative to be identified, the Infill Alternative would be the environmentally superior alternative. This is because it nominally reduces the Proposed Project's significant and unavoidable impacts pertaining to GHG emissions and VMT.

Table ES-1: Summary of Impacts and Mitigation Measures			
<i>Impact</i>	<i>Mitigation Measures</i>	<i>Significance before Mitigation</i>	<i>Significance after Mitigation</i>
3.1 Aesthetics			
3.1-1 Development under the Proposed Project would not have a substantial adverse effect on a scenic vista.	None required	Less than significant	Not applicable
3.1-2 Development under 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.	None required	Less than significant	Not applicable
3.1-3 Development under the Proposed Project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings in non-urbanized areas or conflict with applicable zoning and other regulations governing scenic quality in urbanized areas.	None required	Less than significant	Not applicable
3.1-4 Development under 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.	None required	Less than significant	Not applicable
In combination with other past, present, and reasonably foreseeable projects, the Proposed Project would not result in significant cumulative impacts	None required	Less than significant	Not applicable

Table ES-1: Summary of Impacts and Mitigation Measures			
<i>Impact</i>	<i>Mitigation Measures</i>	<i>Significance before Mitigation</i>	<i>Significance after Mitigation</i>
related to scenic resources within a state scenic highway; degradation of visual character; or light and glare.			
3.2 Air Quality			
3.2-1 Implementation of the Proposed Project would not conflict with or obstruct the implementation of the applicable air quality plan.	None required	Less than significant	Not applicable
3.2-2 Implementation of the Proposed Project would not result in a cumulatively considerable net increase of criteria pollutants for which the Project region is nonattainment under an applicable federal or State ambient air quality standard.	<p>MM-AQ-1: Implement BAAQMD Basic Construction Mitigation Measures. The Town shall require new project development projects to implement the BAAQMD’s Basic Control Mitigation Measures to address fugitive dust emissions that would occur during earthmoving activities associated with project construction. These measures include:</p> <ul style="list-style-type: none"> a) All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day. b) All haul trucks transporting soil, sand, or other loose material off-site shall be covered. c) All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited. d) All vehicle speeds on unpaved roads shall be limited to 15 mph. e) All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible 	Less than significant with mitigation incorporated	Less than significant

Table ES-1: Summary of Impacts and Mitigation Measures			
<i>Impact</i>	<i>Mitigation Measures</i>	<i>Significance before Mitigation</i>	<i>Significance after Mitigation</i>
	<p>after grading unless seeding or soil binders are used.</p> <p>f) Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.</p> <p>g) All construction equipment shall be maintained and properly tuned in accordance with manufacturer’s specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.</p> <p>h) Post a publicly visible sign with the telephone number and person to contact at the Town regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District’s phone number shall also be visible to ensure compliance with applicable regulations.</p> <p>MM-AQ-2: Prepare Project-level Construction Emissions Assessment. The Town shall require new development projects to submit a quantitative project-level construction criteria air pollutant and toxic air contaminant emissions analysis prior to the start of construction activities that shows project construction activities would not exceed BAAQMD project-level thresholds of significance. The analysis may rely on BAAQMD construction screening criteria to demonstrate that a detailed assessment of criteria</p>		

Table ES-1: Summary of Impacts and Mitigation Measures			
<i>Impact</i>	<i>Mitigation Measures</i>	<i>Significance before Mitigation</i>	<i>Significance after Mitigation</i>
	<p>air pollutant and toxic air contaminant construction emissions is not required for the project. If the project does not satisfy all BAAQMD construction screening criteria, the analysis shall estimate and compare construction criteria air pollutant and toxic air contaminant emissions against the project-level thresholds of significance maintained by BAAQMD and, if emissions are shown to be above BAAQMD thresholds, then the project must implement measures to reduce emissions below BAAQMD thresholds. Mitigation measures to reduce emissions could include, but are not limited to:</p> <ul style="list-style-type: none"> a) Watering exposed surfaces at a frequency adequate to maintain a minimum soil moisture content of 12 percent, as verified by moisture probe or lab sampling; b) Suspending excavation, grading, and/or demolition activities when average wind speeds exceed 20 miles per hour; c) Selection of specific construction equipment (e.g., specialized pieces of equipment with smaller engines or equipment that will be more efficient and reduce engine runtime); d) Installing wind breaks that have a maximum 50 percent air porosity; e) Restoring disturbed areas with vegetative ground cover as soon as possible; f) Limiting simultaneous ground-disturbing activities in the same area at any one time (e.g., excavation and grading); 		

Table ES-I: Summary of Impacts and Mitigation Measures			
<i>Impact</i>	<i>Mitigation Measures</i>	<i>Significance before Mitigation</i>	<i>Significance after Mitigation</i>
	<ul style="list-style-type: none"> g) Scheduling/phasing activities to reduce the amount of disturbed surface area at any one time; h) Installing wheel washers to wash truck and equipment tires prior to leaving the site; i) Minimizing idling time of diesel-powered construction equipment to no more than two minutes or the shortest time interval permitted by manufacturer’s specifications and specific working conditions; j) Requiring equipment to use alternative fuel sources (e.g., electric-powered and liquefied or compressed natural gas), meet cleaner emission standards (e.g., U.S. EPA Tier IV Final emissions standards for equipment greater than 50-horsepower), and/or utilizing added exhaust devices (e.g., Level 3 Diesel Particular Filter); k) Requiring that all construction equipment, diesel trucks, and generators be equipped with Best Available Control Technology for emission reductions of NOx and PM; l) Requiring all contractors use equipment that meets CARB’s most recent certification standard for off-road heavy-duty diesel engines; and m) Applying coatings with a volatile organic compound (VOC) that exceeds the current regulatory requirements set forth in BAAQMD regulation 8, Rule 3 (Architectural Coatings). 		
3.2-3 Implementation of the Proposed Project would not expose sensitive	MM-AQ-1: Implement BAAQMD Basic Construction Mitigation Measures.	Less than significant with mitigation incorporated	Less than significant

Table ES-1: Summary of Impacts and Mitigation Measures			
<i>Impact</i>	<i>Mitigation Measures</i>	<i>Significance before Mitigation</i>	<i>Significance after Mitigation</i>
receptors to substantial pollutant concentrations.	MM-AQ-2: Prepare Project-level Construction Emissions Assessment.		
3.2-4 Implementation of the Proposed Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.	None required	Less than significant	Not applicable
In combination with other past, present, and reasonably foreseeable projects, the Proposed Project would not result in significant cumulative impacts related to conflicting with an applicable air quality plan, criteria pollutants, sensitive receptors, or other emissions (such as those leading to odors).	None required	Less than significant	Not applicable
3.3 Biological Resources			
3.3-1 Implementation of the Proposed Project would have a substantial adverse effect, either directly or through habitat modifications, on species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. However, with implementation of Mitigation Measures BIO-1 through BIO-10, the impacts of	MM-BIO-1: Install Temporary Flagging or Barrier Fencing to Protect Sensitive Biological Resources Adjacent to the Work Area. If required pursuant to pre-construction surveys, a qualified biologist with prior experience for subject species in San Mateo County shall identify and flag or fence sensitive biological habitat on-site to ensure it is avoided during construction and pre-construction activities. Flagging or fencing shall be installed prior to site preparation activities and remain in place for the duration of construction activities. MM-BIO-2: Avoid and Minimize Disturbance to Special-Status Plant Species and Special-Status Butterfly Host Plant Species. If necessary pursuant to	Less than significant with mitigation incorporated	Less than significant

Table ES-I: Summary of Impacts and Mitigation Measures			
<i>Impact</i>	<i>Mitigation Measures</i>	<i>Significance before Mitigation</i>	<i>Significance after Mitigation</i>
<p>future development under the Proposed Project on special-status species would be less than significant.</p>	<p>the results of pre-construction surveys, the work area shall be modified to the extent feasible to avoid indirect or direct impacts on special-status plants. Special-status plant and special-status butterfly host plant species shall be avoided whenever possible by delineating and observing a no disturbance buffer of at least 50 feet from the outer edge of the plant population(s) or specific habitat type(s) required by special status or host plant species. If complete avoidance of special-status plants or special-status butterfly host plants is not feasible, at a minimum the special-status plant or host species shall be relocated on-site, at least 20 feet away from construction directly relating to the project. All site preparation, seed/cutting/root collection, grow-out, and plant installation shall be conducted by a landscape company approved by the Town of Woodside with experience working on restoration projects and within the habitats present on-site. Following the relocation, the plantings/seedlings shall be monitored annually for five years or longer by a botanist paid for and hired by the project proponent to determine the success of the relocation. For individual plants, success criteria is the establishment of new viable occurrences equal to or greater in number than the number of plants impacted, for at least three years without supplemental care such as watering. On-site maintenance of the relocated plants shall be contracted to a landscaping company which will also be paid for and hired by the project proponent. An annual report by a botanist detailing the success of the relocation shall be drafted and submitted to all responsible agencies (e.g., CDFW, USFWS) for their review. If success criteria are not met, management of the relocated plants will be modified as needed, but management and reporting shall continue until success criteria are met.</p>		

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<i>Impact</i>	<i>Mitigation Measures</i>	<i>Significance before Mitigation</i>	<i>Significance after Mitigation</i>
	<p>MM-BIO-3: Disturbance to Serpentine Needlegrass Grassland Habitat. When preparing detailed plans for development, the developer shall avoid impacts to serpentine needlegrass grassland, or at least minimize such impacts, to the extent practicable. If all impacts on this habitat are avoided, further mitigation is not necessary. If any serpentine needlegrass grassland will be impacted, the following measures will be implemented:</p> <p>To compensate for unavoidable effects to serpentine needlegrass grassland, the project shall protect, enhance, and manage serpentine communities outside of the project site at a 2:1 (impact: mitigation) ratio, on an acreage basis. Compensatory mitigation may be carried out through one or more of the following methods, in order of preference:</p> <ul style="list-style-type: none"> a) Preservation via acquisition of land supporting serpentine communities via fee title or purchase of a conservation easement b) Contribute to the management of existing serpentine communities (e.g., at Edgewood Park) c) The restoration or enhancement of previously existing or degraded serpentine communities d) In coordination with USFWS, the project proponent will develop a Habitat Mitigation and Management Plan (HMMP), describing the measures that will be taken to enhance and manage the mitigation lands and to monitor the effects of management on serpentine communities. The developer then must apply to USFWS for an incidental take permit. That plan will include, at a minimum, the following: 		

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	<ul style="list-style-type: none"> • A summary of impacts to serpentine needlegrass grassland and the proposed mitigation • A description of the location and boundaries of the mitigation site and description of existing site conditions • A description of measures to be undertaken if necessary to enhance (e.g., through focused management) the mitigation site for serpentine communities • Proposed management activities, such as managed grazing and management of invasive plants, to maintain high-quality serpentine communities • A description of community monitoring measures on the mitigation site, including specific, objective goals and objectives, performance indicators, success criteria, monitoring methods, data analysis, reporting requirements, and monitoring schedule. Determining specific performance/success criteria requires information regarding the specific mitigation site, its conditions, the biological resources present on the site, and the specific enhancement and management measures tailored to that site and its conditions. As a result, those specific criteria will be defined in the HMMP (rather than in this EIR). Nevertheless, the performance/success 		

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	<p>criteria shall be defined to ensure that the result of the mitigation is the management and protection of high-quality serpentine communities that adequately compensate for the functions and values of the impacted communities.</p> <ul style="list-style-type: none"> • A description of the management plan’s adaptive component, including potential contingency measures for mitigation elements that do not meet performance criteria • A description of the funding mechanism to ensure the long-term maintenance and monitoring of the mitigation lands <p>MM-BIO-4: Disturbance to Bat Species. If required pursuant to pre-construction surveys, a qualified biologist paid for and hired by the applicant shall conduct preconstruction surveys for bats, which shall take place during the maternity roosting season (defined as: April 1 through August 31) within riparian habitat and any old wooden buildings within a project site. Surveys shall be conducted no less than 14 days prior to removal of trees, snags, or buildings within the project area. Ultrasonic acoustic surveys and/or other site appropriate survey method may be performed to determine the presence or absence of bats utilizing the project site as roosting or foraging habitat. Additionally, the following measures shall be implemented to lessen impacts to bats: If special-status bat species are detected during surveys, species and roost specific mitigation measures shall be developed by the qualified biologist. Such measures may include postponing removal of trees, snags, or structures until the end of the maternity roosting season or construction of species</p>		

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<i>Impact</i>	<i>Mitigation Measures</i>	<i>Significance before Mitigation</i>	<i>Significance after Mitigation</i>
	<p>appropriate roosting habitat within, or adjacent to the project site.</p> <ul style="list-style-type: none"> a) Trees, snags, and buildings may be removed outside of the maternity roosting season without performing preconstruction bat surveys. b) Felled trees shall remain on the ground for 24 hours prior to being removed or chipped. c) For all buildings to be demolished, internal entrance surveys shall be performed by a qualified bat biologist no less than 14 days prior to demolition to determine if buildings currently or previously supported roosting bats. If bats are determined to be present, appropriate methods shall be used to exclude bats from the building. Such methods may include installation of one way “valves” to allow bats to exit, but not allow them to reenter the building. d) If an identified maternity roost location is removed, species and roost appropriate mitigation shall be developed in consultation with CDFW. Mitigation shall include at minimum the replacement of a suitable roost structure within or immediately adjacent to the project site, such that similar structure shape and thermal properties are met with the replacement roost. e) If no active roosts are identified, then work may commence as planned. Survey results are valid for 30 days from the survey date. Should work commence later than 30 days from the survey date, surveys should be repeated. No preconstruction bat surveys are required for work conducted between the hibernation season and 		

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<i>Impact</i>	<i>Mitigation Measures</i>	<i>Significance before Mitigation</i>	<i>Significance after Mitigation</i>
	<p>maternity season (i.e., September 1 through October 31).</p> <p>MM-BIO-5: Disturbance to Bumble Bee Species. If required pursuant to pre-construction surveys, a qualified biologist paid for and hired by the applicant shall conduct a take avoidance survey for active special-status bumble bee colony nesting sites in any previously undisturbed area no more than 14 days prior to each phase of construction, if the work will occur during the flying season, generally between March 1 and September 1.</p> <p>The surveys shall occur when temperatures are above 60 degrees Fahrenheit (°F), on sunny days with wind speeds below 8 miles per hour, and at least 2 hours after sunrise and 3 hours before sunset. Surveyors shall conduct transect surveys focusing on detection of foraging bumble bees and underground nests using visual aids such as binoculars. If no bumble bees or potential bumble bees are detected, no further mitigation is required. If potential bumble bee species are seen but cannot be identified, the applicant shall obtain authorization from CDFW within 14 days prior to groundbreaking to use nonlethal netting methods to capture bumble bees so as to identify them as to species. If protected bumble bee nests are found, they shall be protected in place until they are no longer active as determined by a licensed entomologist. Survey results, including negative findings, shall be submitted to CDFW and the Town prior to groundbreaking within 14 days of completing the take avoidance survey.</p> <p>MM-BIO-6: Disturbance to Foothill Yellow-Legged Frog (FYLF) and California Red-Legged Frog (CRLF). If it is established via biotic report that either species is likely to occur on the site, in order to minimize disturbance to dispersing or foraging FYLF and</p>		

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<i>Impact</i>	<i>Mitigation Measures</i>	<i>Significance before Mitigation</i>	<i>Significance after Mitigation</i>
	<p>CRLF, all grading activity within 100 feet of aquatic habitat shall be conducted during the dry season, generally between May 1 and October 15, or before the onset of the rainy season,¹ whichever occurs first, unless exclusion fencing is utilized. Construction that commences in the dry season may continue into the rainy season if exclusion fencing is placed between the construction site and creeks or other water features, and includes drainage features to keep the frog from entering the construction area. Additionally, the following measures shall be implemented to lessen impacts to FYLF and CRLF:</p> <ul style="list-style-type: none"> a) Prior to building permit issuance the applicant shall submit evidence to the building department to demonstrate that they have retained a qualified biologist to implement each of the following measures. b) Prior to the start of construction, pre-construction surveys for FYLF and CRLF shall be conducted by a qualified biologist and shall cover the project site and aquatic features within 200 feet of the project site. Additionally, for construction activity within 100 feet of the San Francisquito Creek tributary system, a survey shall be conducted by a qualified biologist each day prior to the start of construction activities to ensure that no FYLF and CRLF are present in the construction area. If FYLF and CRLF are observed in the construction area or access areas, all work in the vicinity of the FYLF and CRLF shall be stopped and the USFWS shall be consulted immediately. The biologist shall submit a summary 		

¹ The rainy season includes periods when a ½-inch of rain or more is predicted within a 24-hour period and is generally between October and April.

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	<p>of their findings to the Town Planning Director prior to the start of construction.</p> <p>c) Exclusion fencing shall be installed around any work area within 100 feet of a drainage, wetland, or creek part of the San Francisquito Creek tributary system, unless construction activity will be completed in one day or less at that location. A qualified biologist shall be present to monitor the installation of the exclusion fence.</p> <p>d) Because dusk and dawn are often the times when FYLF and CRLF are most actively foraging, all construction activities shall cease one half hour before sunset and shall not begin prior to one half hour after sunrise. Construction activities shall not occur during rain events, as FYLF and CRLF are most likely to disperse during periods of precipitation, unless a survey is conducted by a qualified biologist each day prior to the start of construction activities and one-half hour before sunset to ensure that no FYLF and CRLF are observed in the construction area or access areas.</p> <p>e) Any open holes or trenches shall be covered at the end of each working day to prevent FYLF and CRLF from becoming entrapped.</p> <p>f) A Spill Prevention and Control Plan shall be created and made part of the plans for the building permit application. The plan and materials necessary to implement it shall be accessible on-site. Heavy equipment shall be checked daily for leaks. Equipment with leaks shall not be used until leaks are fixed. Refueling shall occur at designated</p>		

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	<p>sites outside of active stream channels or above the ordinary high-water mark.</p> <p>g) Any disturbed ground shall receive appropriate erosion control treatment and native seed mix within seven days following completion of construction or within seven days following a seasonal stoppage of construction.</p> <p>h) All workers shall ensure that food scraps, paper wrappers, food containers, cans, bottles, and other trash from the construction area are deposited in covered or closed trash containers. The trash containers shall not be left open and unattended overnight.</p> <p>MM-BIO-7: Disturbance to San Francisco Garter Snake. If it is established via biotic report that the species is likely to occur on the site, in order to minimize disturbance to the San Francisco Garter Snake, all grading activity within 100 feet of aquatic habitat shall be conducted during the dry season (May 1 through October 15). In addition, a qualified biologist paid for and hired by the applicant shall conduct presence/absence surveys for the San Francisco garter snake prior to construction in or adjacent to riparian areas, grasslands near ponds/wetlands, or other sensitive habitat. Any individuals identified shall be treated in consultation with USFWS. Additionally, the biologist shall supervise the installation of exclusion fencing along the boundaries of the work area, shall conduct environmental awareness training for construction workers, and shall be present during initial vegetation clearing and ground-disturbing activities.</p> <p>MM-BIO-8: Disturbance to California Giant Salamander. If required pursuant to pre-construction</p>		

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	<p>surveys, then immediately prior to ground disturbing activities, a qualified biologist paid for and hired by the applicant will conduct a clearance survey in suitable habitat within the project work area for California Giant Salamander. The project biologist may establish Wildlife Exclusion Fencing (WEF) to keep the species from entering the work area. If the California Giant Salamander is observed during construction, measures will be taken to avoid the individual(s) and the species will be allowed to leave on its own volition or will be relocated outside of the work area by the project biologist. Clearance surveys will be conducted daily unless the project biologist determines that the surveys are no longer necessary.</p> <p>MM-BIO-9: Disturbance to Edgewood Park Micro-blind Harvestman. If required pursuant to pre-construction surveys, all construction activity shall be restricted from December through April to avoid work when the harvestman species are active. Potential impacts on serpentine grassland habitats shall also be mitigated pursuant to the requirements of MM-BIO-4 above.</p> <p>MM-BIO-10: Disturbance to Santa Cruz Kangaroo Rat and San Francisco Dusky-Footed Woodrat. If it is established via biotic report that either species is likely to occur on the site, a qualified biologist paid for and hired by the applicant will conduct a preconstruction survey for Santa Cruz Kangaroo Rat and San Francisco dusky-footed woodrat nests within 30 days of the start of work activities. If active nests are determined to be present in, or within 10 feet of, the impact areas, the following measures will be implemented, as appropriate.</p> <p>a) Active nests that are detected within the work areas will be avoided to the extent feasible. Ideally, a minimum 10-foot buffer will be maintained</p>		

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<i>Impact</i>	<i>Mitigation Measures</i>	<i>Significance before Mitigation</i>	<i>Significance after Mitigation</i>
	<p>between project activities and nests to avoid disturbance. In some situations, a smaller buffer may be allowed if, in the opinion of a qualified biologist, nest relocation would represent a greater disturbance to the woodrats than the adjacent work activities.</p> <p>b) If avoidance of active nests within and immediately adjacent to (within 10 feet of) the work areas is not feasible, then nest materials will be relocated to suitable habitat as close to the project area as possible (ideally, within or immediately adjacent to the project site).</p> <p>a. Prior to the start of construction activities, a qualified biologist will disturb the nest to the degree that all kangaroo rats or woodrats leave the nest and seek refuge outside of the construction area. Relocation efforts will avoid the peak nesting season (February–July) to the maximum extent feasible. Disturbance of the nest will be initiated no earlier than one hour before dusk to prevent the exposure of kangaroo rats and woodrats to diurnal predators. Subsequently, the biologist will dismantle and relocate the nest material by hand. During the deconstruction process, the biologist will attempt to assess if there are juveniles in the nest. If immobile juveniles are observed, the deconstruction process will be discontinued until a time when the biologist believes the juveniles will be capable of independent survival (typically</p>		

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	after 2 to 3 weeks). A no-disturbance buffer will be established around the nest until the juveniles are mobile. The nest may be dismantled once the biologist has determined that adverse impacts on the juveniles would not occur.		
3.3-2 Implementation of 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 Game or U.S. Fish and Wildlife Service.	None required	Less than significant	Not applicable
3.3-3 Implementation of the Proposed Project would not have a substantial adverse effect on federally protected wetlands, as defined by Section 404 of the Clean Water Act (including, but not limited to, marshes, vernal pools, coastal areas, etc.) through direct removal, filling, hydrological interruption, or other means.	None required	Less than significant	Not applicable
3.3-4 Implementation of 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	None required	Less than significant	Not applicable

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<i>Impact</i>	<i>Mitigation Measures</i>	<i>Significance before Mitigation</i>	<i>Significance after Mitigation</i>
migratory wildlife corridors, or impede the use of native wildlife nursery sites.			
In combination with other past, present, and reasonably foreseeable projects, the Proposed Project would not result in significant cumulative impacts related to special status species, riparian or natural habitat, federally protected wetlands, movement of native or migratory fish or wildlife species, conflict with adopted local policies or ordinances protecting biological resources, or conflict with adopted habitat conservation plans.	None required	Less than significant	Not applicable
3.4 Geology, Soils and Seismicity			
3.4-1 Implementation of the Proposed Project would not expose residents, visitors and employees, as well as public and private structures, to substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault; strong seismic ground shaking; seismically related ground failure, including liquefaction; or landslides.	None required	Less than significant	Not applicable
3.4-2 Implementation of the Proposed Project would not locate structures on expansive soils or on	None required	Less than significant	Not applicable

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a geologic unit or soil that is unstable, or that would become unstable as a result of new development under the Proposed Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse, or create substantial risks to life or property.			
In combination with other past, present, and reasonably foreseeable projects, the Proposed Project would not result in significant cumulative impacts related to exposure to seismic hazards, soil erosion, or location of structures on unstable soils.	None required	Less than significant	Not applicable
3.5 Greenhouse Gas Emissions			
3.5.1 Development under the Proposed Project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	<p>MM-GHG-1: Require Implementation of BAAQMD-recommended BMPs. As a standard condition of project approval, the Town shall require that all new construction and major remodels ensure through terms of contract that their contractors implement the following BAAQMD’s recommended best management practices to reduce construction-related GHG emissions (based on BAAQMD’s CEQA Guidelines):</p> <ul style="list-style-type: none"> • Ensure alternative fueled (e.g., biodiesel, electric) construction vehicles/equipment make up at least 15 percent of the fleet. • Use local building materials of at least 10 percent (sourced from within 100 miles of the Planning Area). 	<p>Construction: Less than significant with mitigation incorporated;</p> <p>Operations: Significant and unavoidable with mitigation incorporated</p>	Significant and unavoidable

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	<p>MM-GHG-2: Update the Town of Woodside Climate Action Plan. The Town of Woodside shall adopt and begin to implement an updated Climate Action Plan within a goal of 18 months, but no later than 36 months, of adopting the Proposed Project in order to address the GHG reduction goals of Executive Order B-30-15 and Executive Order S-03-05 for GHG sectors that the Town has direct or indirect jurisdictional control over. The Climate Action Plan shall include a community inventory of GHG emission sources, and quantifiable GHG emissions reduction targets for 2030 and 2050, that are consistent with the statewide GHG reduction targets. The Town shall monitor progress toward its GHG emissions reduction goals and prepare reports every five years detailing that progress.</p>		
<p>3.5-2 Development under the Proposed Project would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.</p> <p>The Proposed Project would not achieve the 15 percent VMT per capita reduction target under buildout conditions. Therefore, GHG emissions from mobile sources would still conflict with the threshold of reduction consistent with SB 743, therefore, the Proposed Project would have a significant and unavoidable and cumulatively considerable impact.</p>	<p>MM-GHG-1: Require Implementation of BAAQMD-recommended BMPs.</p> <p>MM-GHG-2: Update the Town of Woodside Climate Action Plan.</p>	<p>Construction: Less than significant with mitigation incorporated;</p> <p>Operations: significant and unavoidable</p>	<p>Significant and unavoidable</p>

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<i>Impact</i>	<i>Mitigation Measures</i>	<i>Significance before Mitigation</i>	<i>Significance after Mitigation</i>
In combination with other past, present, and reasonably foreseeable projects, the Proposed Project would not result in significant cumulative impact regarding construction-generated GHG emissions.	None required	Less than significant	Not applicable
3.6 Noise			
3.6-1 Implementation of the Proposed Project would not result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	<p>MM-N-1: Construction Noise Reduction. For all construction projects of more than three single-family residences or multi-family residential structures with more than six dwelling units that are anticipated to exceed the exterior residential noise exposure threshold in residential areas of 55 dBA Ldn, the following mitigation would be required:</p> <ul style="list-style-type: none"> • Equipment Staging Areas. Equipment staging shall be located in areas that will create the greatest distance feasible between construction-related noise sources and noise-sensitive receptors. • Electrically-Powered Tools and Facilities. Electrical power shall be used to run air compressors and similar power tools and to power any temporary structures, such as construction trailers or caretaker facilities. • Smart Back-up Alarms. Mobile construction equipment shall have smart back-up alarms that automatically adjust the sound level of the alarm in response to ambient noise levels. Alternatively, back-up alarms shall be disabled and replaced with human spotters to ensure 	Less than significant with mitigation incorporated	Less than significant

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	<p>safety when mobile construction equipment is moving in the reverse direction.</p> <ul style="list-style-type: none"> Additional Noise Attenuation Techniques. During the clearing, earth moving, grading, and foundation/conditioning phases of construction, temporary sound barriers shall be installed and maintained between the construction site and the sensitive receptors. Temporary sound barriers shall consist of sound blankets affixed to construction fencing or temporary solid walls along all sides of the construction site boundary facing potentially sensitive receptors. 			
3.6-2	Development under the Proposed Project would not generate excessive groundborne vibration or groundborne noise levels.	None required	Less than significant	Not applicable
3.6-3	The Proposed Project would not be located within the vicinity of a private airstrip or an airport land use plan or expose people residing or working in the Planning Area to excessive noise levels.	None required	No impact	Not applicable
	In combination with other past, present, and reasonably foreseeable projects, the Proposed Project would not result in significant cumulative impacts related to ambient noise levels, groundborne vibration or groundborne noise levels, or airport noise.	None required	Less than significant	Not applicable

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<i>Impact</i>	<i>Mitigation Measures</i>	<i>Significance before Mitigation</i>	<i>Significance after Mitigation</i>	
3.7 Transportation				
3.7-1	Implementation of the Proposed Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, and bicycle and pedestrian facilities	None required	Less than significant	Not applicable
3.7-2	<p>Implementation of the Proposed Project would conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).</p> <p>Project generated home-based VMT per resident of 24.8 would be higher than the threshold of significance (22.1), and hence indicate that the Project would result in a potentially significant transportation impact requiring mitigation. As such, TDM measures are applied in Mitigation Measures TRANS-1 and TRANS-2 with estimated VMT reductions per resident from 24.8 to 24.1, which remains above the threshold of significance (22.1). Due to the inability to determine that overall Project home-based residential VMT per capita can be reduced below the threshold of significance despite implementation of VMT reduction measures, the Project</p>	<p>MM-TRANS-1: Implement VMT Reduction Measures for Cañada College Housing Development. The student housing planned for Cañada College shall develop a transportation demand management plan outlining VMT reducing measures. These measures may include, but are not limited to, the measures listed below:</p> <ul style="list-style-type: none"> • Unbundle parking costs (i.e. separate parking costs from property costs) • Subsidize resident transit passes for use on SamTrans route 278 • Provide transit improvements, such as providing bus shelter or contributing land on the project site for bus stop along SamTrans route 278 (depending on project location within the campus) • Provide on-site car share or vehicle fleet, bike share, or scooter share programs • Provide secure bike storage facilities and/or a bike repair station on site 	Significant and unavoidable with mitigation incorporated	Significant and unavoidable

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<p>transportation-related impact is considered significant and unavoidable with mitigation.</p> <p>This impact is cumulative by nature because the effects specific to the Proposed Project cannot be reasonably differentiated from the broader effects of regional growth and development.</p>	<ul style="list-style-type: none"> • Incorporate bicycle and pedestrian access to college facilities in site design, including connectivity to the existing free Cañada College shuttle stop • Assign or hire a TDM Coordinator to provide education and marketing resources for residents and visitors 		
<p>In combination with other past, present, and reasonably foreseeable projects, the Proposed Project would not result in significant cumulative impacts related to conflict with adopted transportation plans, hazards related to roadway design features, or emergency access.</p>	<p>None required</p>	<p>Less than significant</p>	<p>Not applicable</p>
3.8 Tribal Cultural Resources			
<p>3.8-1 Implementation of the Proposed Project would not cause an adverse change in the significance of a tribal cultural resource, defined in PRC Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value</p>	<p>MM-CUL-1: Conduct Cultural Resources Awareness Training. Prior to the start of any ground disturbance or construction activities, developers of projects within 50 feet of a creek or within 50 feet of recorded archaeological resources or tribal cultural resources in the Planning Area shall retain a qualified professional archaeologist to conduct cultural resource awareness training for construction personnel. This training shall include an overview of what cultural resources are and why they are important, archaeological terms (such as site, feature, deposit), project site history, types of cultural</p>	<p>Less than significant with mitigation incorporated</p>	<p>Less than significant</p>

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<p>to a California Native American Tribe, and that is:</p> <p>(a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1(k), or</p> <p>(b) 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 PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.</p>	<p>resources likely to be uncovered during excavation, laws that protect cultural resources, and the unanticipated discovery protocol per the PRC Section 21083.</p>		
<p>In combination with other past, present, and reasonably foreseeable projects, the Proposed Project would not result in significant cumulative impacts related to tribal cultural resources.</p>	<p>None required</p>	<p>Less than significant</p>	<p>Not applicable</p>
3.9 Utilities			

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3.9-1 Implementation of 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	None required	Less than significant	Not applicable
In combination with other past, present, and reasonably foreseeable projects, the Proposed Project would not result in significant cumulative impacts related to the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities.	None required	Less than significant	Not applicable
3.10 Wildfire			
3.10-1 Implementation of the Proposed Project would not substantially impair an adopted emergency response plan or emergency evacuation plan.	None required	Less than significant	Not applicable
3.10-2 Implementation of the Proposed Project would not exacerbate wildfire risks, and thereby expose	None required	Less than significant	Not applicable

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<i>Impact</i>	<i>Mitigation Measures</i>	<i>Significance before Mitigation</i>	<i>Significance after Mitigation</i>
project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.			
3.10-3 Implementation of the Proposed Project would not require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.	None required	Less than significant	Not applicable
3.10-4 Implementation of 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.	None required	Less than significant	Not applicable
In combination with other past, present, and reasonably foreseeable projects, the Proposed Project would not result in significant cumulative impacts related to adopted emergency response/evacuation plans, wildfire risk, associated wildfire infrastructure, or fire-induced flooding and landslides.	None required	Less than significant	Not applicable

I Introduction

This Draft Environmental Impact Report (EIR) has been prepared on behalf of the Town of Woodside (Town) in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000, *et seq.*). This EIR analyzes potential environmental impacts of the adoption and implementation of the proposed Town of Woodside 2023-2031 General Plan Housing Element Update, referred to as the “Proposed Project.” This chapter outlines the purpose and overall approach to the preparation of the EIR. The Town is the lead agency responsible for ensuring that the Proposed Project complies with CEQA. “Lead agency” is defined by Section 21067 of CEQA as “the public agency which has the principal responsibility for carrying out or approving a project which may have a significant effect upon the environment.”

I.1 Purpose of the EIR

The primary intent of CEQA is to ensure that public agency decision-makers document and consider the environmental implications of their actions in order to avoid or minimize environmental damage that could result from the implementation of a project wherever feasible, and to balance environmental, economic, and social objectives. The purpose of an EIR is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided (CEQA Section 21002.1).

PURPOSE

This EIR serves the following purposes:

- To satisfy CEQA requirements for analysis of environmental impacts by including a complete and comprehensive programmatic evaluation of the physical impacts of adopting and implementing the Proposed Project;
- To recommend a set of measures to mitigate any significant adverse impacts;
- To analyze a range of reasonable alternatives to the Proposed Project;
- To inform decision-makers and the public of the potential environmental impacts of the Proposed Project prior to taking action on the Proposed Project, and to assist Town officials in reviewing and adopting the Proposed Project; and

- To provide a basis for the review of subsequent development projects and public improvements proposed within the Planning Area. Subsequent environmental documents may be tiered from the Final EIR.

The Proposed Project consists of policies, diagrams, and standards to guide the future development of the Planning Area, as described in Chapter 2: Project Description. This EIR contains analysis of all potential environmental impacts expected to result from implementation of the various policies and programs identified as part of the Proposed Project, including those that serve to avoid or minimize adverse environmental impacts. In accordance with CEQA requirements, this EIR also identifies and evaluates alternatives to the Proposed Project, including a No Project Alternative and an Infill Alternative. An environmentally superior alternative is identified as part of the Alternatives analysis.

This EIR evaluates at a programmatic level the potential environmental impacts of the Proposed Project given its 2031 planning horizon. It can be anticipated that conditions will change; however, the assumptions used are the best data and information available at the time of EIR preparation and reflect existing knowledge of patterns of development.

INTENDED USES OF THE EIR

The California Environmental Quality Act, Public Resources Code Section 21000, *et seq.* (CEQA) Guidelines (Section 15124(d)) require EIRs to identify the agencies that are expected to use the EIR in their decision-making, and the approvals for which the EIR will be used. This EIR will inform the Town, in addition to other responsible agencies, persons, and the general public, of the potential environmental effects of the Proposed Project and the identified alternatives. The Town will use the EIR as part of its review and approval of the Proposed Project. Other agencies that may use the EIR include local and regional agencies such as the Woodside School District, the Woodside Fire Protection District, San Francisco Regional Water Quality Control Board, and the Association of Bay Area Governments (ABAG); and State agencies such as the California Department of Transportation (Caltrans).

1.2 Approach and Scope of the EIR

TYPE OF EIR

This EIR is a program EIR, defined in Section 15168 of the CEQA Guidelines as an EIR which addresses “a series of actions that can be characterized as one large project and are related either: (1) Geographically; (2) As logical parts in the chain of contemplated actions; (3) In connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program; or (4) As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.”

Program EIRs can be used as the basic, general environmental assessment for an overall program of future projects, policies, and related implementation actions, such as the Proposed Project. A

program EIR has several advantages. First, it provides a basic reference document to avoid unnecessary repetition of facts or analysis in subsequent project-specific assessments. Second, it allows the lead agency to look at the broad, regional impacts of a program of actions before its adoption, and eliminates redundant or contradictory approaches to the consideration of regional and cumulative effects.

As a programmatic document, this EIR presents an assessment of the potential impacts of the Proposed Project on the entirety of the Planning Area which encompasses about 11.8 square miles, shown on Figure 2-1. As a program EIR, the preparation of this document does not relieve the sponsors of specific projects from the responsibility of complying with the requirements of CEQA (and/or NEPA for projects requiring federal funding or approvals). As noted, individual projects are required to prepare a more precise, project-level analysis to fulfill CEQA and/or NEPA requirements. The lead agency responsible for reviewing these projects shall determine the level of review needed, and the scope of that analysis will depend on the specifics of the particular project. These projects may, however, use the discussion of impacts in this EIR as a basis of their assessment of these regional, townwide, or cumulative impacts, provided that the projects are consistent with the Proposed Project and the data and assumptions used in this EIR remain current and valid.

ENVIRONMENTAL ISSUE AREAS

Information gathered about the environmental setting is used to define relevant planning issues, determine thresholds of significance, and evaluate potential impacts. The scope of analysis for this DEIR was determined by the Town as a result of initial project review and consideration of comments received in response to the Notice of Preparation (NOP). An Initial Study was prepared and circulated with the NOP, both of which are included as Appendix A of the Draft EIR.

Many of the impacts of the Proposed Project will be the same or similar to those previously evaluated and do not require further study. The Initial Study scoped out the following environmental impact categories from subsequent environmental analysis on the basis that they would not experience new or substantially more severe environmental impacts:

- Agricultural and Forestry Resources
- Biological Resources (CEQA Guidelines Appendix G Impacts e) regarding conflicts with local policies or ordinances and f) regarding conflicts with an adopted Habitat Conservation Plan)
- Cultural Resources
- Energy
- Geology and Soils (CEQA Guidelines Appendix G Impacts b) regarding soil erosion; e) regarding septic tanks; and f) regarding paleontological resources)
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use/Planning
- Mineral Resources

- Population/Housing
- Public Services
- Recreation
- Transportation (CEQA Guidelines Appendix G Impacts c) regarding hazards and d) regarding emergency access)
- Utilities and Service Systems (CEQA Guidelines Appendix G Impacts b) regarding water supplies; c) regarding wastewater treatment capacity; d) regarding solid waste generation; and e) regarding solid waste regulations)

The Town and its consultants concluded that potentially significant impacts in several issue areas may arise. This DEIR analyzes the following areas of concern:

- Aesthetics
- Air Quality
- Biological Resources
- Geology, Soils, and Seismicity
- Greenhouse Gas Emissions
- Noise
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

PLANNING HORIZON

For analytic purposes in this EIR, the base year is 2023 and the horizon year representing future conditions is 2031, unless otherwise noted. In cases where current data is not available, the most recent known data is used to depict baseline conditions. The horizon year of 2031 represents the target year of the Proposed Project when projects and programs are anticipated to be fully implemented.

ALTERNATIVES

CEQA requires EIRs to evaluate a reasonable range of alternatives to the Proposed Project that could feasibly attain most of the basic project objectives and would avoid or substantially lessen any of the significant environmental impacts. This EIR evaluates two alternatives, including an Infill Alternative and a No Project Alternative. State CEQA Guidelines Section 15126.6(e) requires an EIR to analyze the specific alternative of “No Project”. Under the No Project Alternative, the Town would not update the existing Housing Element.

1.3 Planning Process and Public Involvement

NOTICE OF PREPARATION AND PUBLIC PARTICIPATION

A NOP for the EIR on the Proposed Project was submitted to the State Clearinghouse on May 23, 2023 and circulated among relevant State and local agencies, as well as to members of the public. The Town received a total of two comment letters from State public agencies and 21 comment letters from individuals during the NOP's 30-day review periods, which ended on June 22, 2023. The NOP and comments on the NOP received by the Town are summarized in Chapter 3 of this EIR and included as Appendices A and B of this EIR. Consistent with legal requirements and State guidance, a public scoping meeting was held before the Planning Commission on June 7, 2023 to collect comments and suggestions on scope and content for the EIR; solicit input on potential impacts, mitigation measures, and alternatives to consider; and consult with public agencies responsible for natural resources, other regulatory bodies, neighboring communities, Native American tribes, and members of the public. Comments on the NOP, along with input received during public workshops and meetings over the course of the Proposed Project's process, have helped to identify the major planning and environmental issues and concerns and establish the framework of this EIR.

TRIBAL CONSULTATION (SB 18 AND AB 52)

Senate Bill (SB) 18, codified in California Government Code (CGC) Section 65352.3, requires local governments to consult with California Native American tribes identified by the Native American Heritage Commission (NAHC) for the purpose of protecting, and/or mitigating impacts to cultural places prior to the adoption or amendment of a general plan. Additionally, Assembly Bill (AB) 52 requires tribal cultural resources to be addressed under CEQA and established requirements for consultation with Native American tribes as part of the CEQA process, providing both federal and non-federally recognized tribes the right to formal consultation with project lead agencies (California Public Resources Code [PRC] Section 21080.3.1). In accordance with SB 18 and AB 52, the Town contacted the NAHC in October 2022 to request a consultation list of tribes traditionally and culturally affiliated with the Planning Area. Upon receipt of a list of tribal contacts, the Town contacted tribal representatives in December 2022, providing information about the planning process and inviting them to initiate consultation under AB 52 if desired. The Town has not received any responses as of February 2024. Correspondence with the NAHC and tribal contacts is included in Appendix C. Additionally, the NOP was shared with the NAHC and in May 2023 the NAHC responded with recommendations for conducting cultural resources assessments, which were included in the preparation of this Draft EIR.

The record search of the NAHC Sacred Lands File (SLF) was completed and the results were positive. As such, the environmental setting in the Planning Area and the sites of known Native American archaeological resources in the Planning Area indicate that there is potential for the Planning Area to contain tribal cultural resources from past Native American activities.

DRAFT EIR REVIEW

The CEQA Guidelines establish that the public review period for a draft EIR shall be no shorter than 30 days and no longer than 60 days. The public review period for a draft EIR that has been submitted to the State Clearinghouse for review by State agencies shall be no shorter than 45 days (CCR 15105). This Draft EIR is available for review to the public and interested and affected agencies for a period of 45 days. The purpose of the review period is to obtain comments “on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided and mitigated” (CCR Section 15204). The EIR and appendices are available for review at the front desk of Town Hall located at 2955 Woodside Rd, Woodside, CA 94062 and online at <https://woodsideca.gov/379/California-Environmental-Quality-Act-CEQ>.

Please submit comments on this Draft EIR in writing or via email to:

Sage Schaan, Planning Director
Town of Woodside
Tel. (650) 530-3432
SSchaan@woodsideca.gov
2955 Woodside Rd
Woodside, CA 94062

After the close of the public review period, Town staff and CEQA consultants will review the comments, respond to the comments received, and determine whether any changes are required to the EIR. The Town Council will then consider certification of the Final EIR. Subsequent to certification of the Final EIR, the Town Council may approve the Proposed Project. If the Town Council approves the Proposed Project, a Notice of Determination will be filed with the State Office of Planning and Research and the Clerk of San Mateo County.

1.4 Other Relevant Plans and Environmental Studies

Plans and studies relevant to the Proposed Project include the following:

- Town of Woodside 2023-2031 Draft Housing Element Update (2022)
- Midpeninsula Regional Open Space District 2021 Wildland Fire Resiliency Plan (2021)
- San Mateo County Multijurisdictional Local Hazard Mitigation Plan (2021)
- Santa Cruz County and San Mateo County Community Wildfire Protection Plan (2018)
- Town of Woodside Emergency Operations Plan (2017)
- San Mateo County Emergency Operations Plan (2015)
- Town of Woodside Climate Action Plan (2015)
- Town of Woodside General Plan (2012)

- Emerald Lake Hills Specific Plan (1995)
- Woodside Glens Specific Plans (1999)

1.5 Organization of the EIR

This Draft EIR is organized into the following chapters, plus appendices:

- ES. **Executive Summary.** Summarizes the EIR by providing an overview of the Proposed Project, the potentially significant environmental impacts that could result from the Proposed Project, the mitigation measures identified to reduce or avoid these impacts, alternatives to the Proposed Project, and identification of the environmentally superior Alternative.
1. **Introduction.** Introduces the purpose of the EIR, explains the EIR process and intended uses of the EIR, and describes the overall organization of this EIR.
 2. **Project Description.** Describes in detail the Proposed Project, including its location and boundaries, purpose and objectives, and projected buildout.
 3. **Environmental Analysis.** Analyzes the environmental impacts of the Proposed Project. Impacts are organized by major topic. Each topic area includes a description of the environmental setting, significance criteria, methodology, and potential impacts.
 4. **Analysis of Alternatives.** Presents a reasonable range of alternatives to the Proposed Project, including the No Project alternative, provides discussion of environmental impacts associated with each alternative, compares the relative impacts of each alternative to those of the Proposed Project and other alternatives, discusses the relationship of each alternative to the Proposed Project's objectives, and identifies the environmentally superior alternative.
 5. **CEQA Required Conclusions.** Summarizes significant environmental impacts, including growth-inducing, cumulative, and significant and unavoidable impacts; significant irreversible environmental change; and impacts found not to be significant.
 6. **List of Preparers.** Identifies the persons and organizations that contributed to the preparation of the EIR.
 7. **Appendices.** Includes the NOP and compilation of agency and public comments received on the NOP, as well as other technical appendices including data used for environmental analysis in this EIR. The Appendices Table of Contents is included as follows:
 - A) NOP and Initial Study
 - B) NOP Comment Letters
 - C) Cultural Resource Materials
 - D) GHG and Air Quality Data

- E) Biological Resources Reports
- F) Noise Study
- G) Traffic Noise Increase Analysis

2 Project Description

The project analyzed in this Environmental Impact Report (EIR) is the proposed General Plan Housing Element Update (Proposed Project) in the Town of Woodside (Town). The Proposed Project is both a policy document and an implementation tool for implementing the Town's General Plan. It contains goals, policies, and programs to guide future housing development within the approximately 11.8-square-mile Planning Area that encompasses the entire town although it does not propose specific development. Implementation will include amendments to the Town's General Plan and Zoning Ordinance. The Town is the Lead Agency for environmental review.

This chapter summarizes the key components of the Proposed Project, including a description of its location and setting; an overview of the planning process and the Proposed Project's relationship to other past and ongoing planning efforts; a description of the Proposed Project's Objectives; a summary of the Proposed Project's key components and planning strategies; a statement of project buildout and phasing assumptions; a summary of regulatory mechanisms anticipated to implement the Proposed Project; and a description of intended uses of this EIR. A detailed analysis and context of specific CEQA topics including aesthetics, air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, noise, transportation, and wildfire can be found in Chapter 3 of this EIR and the EIR appendices.

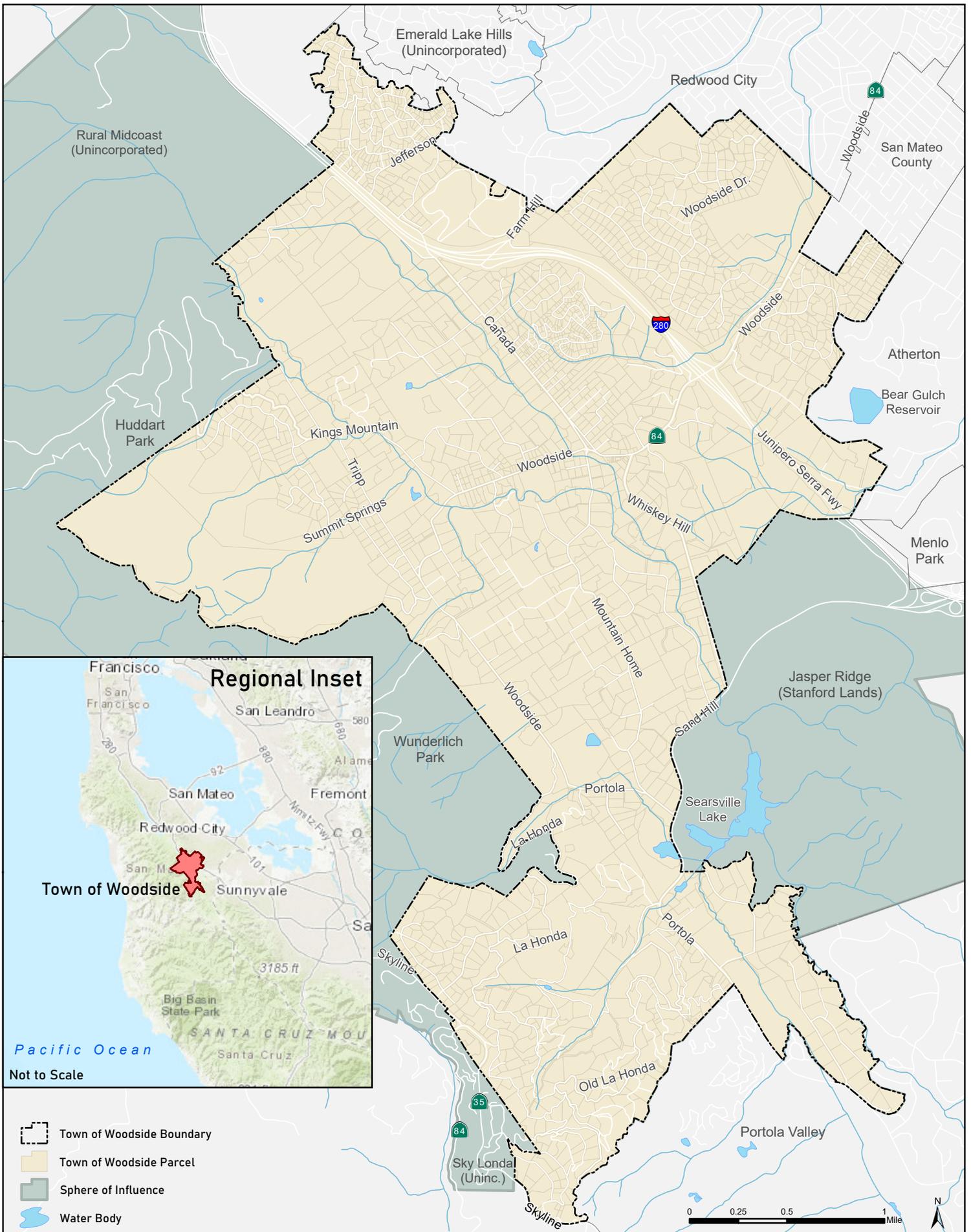
2.1 Location and Setting

REGIONAL LOCATION

Woodside is located in San Mateo County, which is one of the nine counties that comprise the Bay Area region. At the subregional level, Woodside is located in east San Mateo County and approximately 32 miles south of San Francisco. Woodside is bounded by the Town of Portola Valley to the south, the Town of Atherton and City of Menlo Park to the east, Redwood City to the east and north, with unincorporated San Mateo County areas and undeveloped open space Teague Hill administered by the Midpeninsula Regional Open Space District and Huddart County Park administered by San Mateo County Parks in the hills to the west (Figure 2.1-1).

PLANNING AREA AND EXISTING SETTING

This section provides a general overview of the Planning Area; detailed setting for each topic area can be found in Chapter 3 of this EIR. The Town's location and planning boundaries are shown in Figure 2.1.



Land Use

Located in San Mateo County, the Town of Woodside encompasses about 11.8 square miles and is home to 5,131 residents. Institutional, public, and quasi-public land uses in Town include Woodside Elementary School, a fire station, Woodside Library, a church, local government buildings, and a museum. Other notable land uses along Woodside Road include a grocery store, the Post Office, and various restaurants. Much of the rest of the community is primarily single-family residential and open space uses, with some limited local-serving commercial uses. Agriculture, including production of food and fiber products, livestock pasturing, vineyards, and beekeeping, is permitted on most lands within the Town. Overall, residential uses account for 5,611.3 acres, commercial uses occupy 17.6 acres, and open space uses occupy 1,001.4 acres. Vacant land accounts for 258.8 acres within the Town.

Transportation

Regionally, Interstate 280 (I-280) is a major freeway that functions as one of the primary north-south route in the Bay Area, connecting San Francisco to San Jose. I-280 runs through the eastern portion of the Town, while State Route 84 (SR-84) passes through the center of Town, connecting Woodside to Redwood City. Skyline Boulevard (State Route 35) moves through the southern portion of Town.

Locally, Highway 84 (Woodside Road/La Honda Road), from Junipero Serra Freeway (I-280) to Highway 35 (Skyline Blvd) runs through the Town of Woodside and serves as the major arterial road in Woodside. Arterial roads are built for through traffic with intersections with limited direct access to abutting properties, such as Cañada Road, Sand Hill Road, Whiskey Hill Road, and Alameda de las Pulgas. Collector roads are local roads whose primary function is to collect and distribute traffic to a neighborhood, such as Jefferson Avenue, Mountain Home Road, Old La Honda Road, Summit Springs Road, Tripp Road, and Woodside Drive/High Road. Transit service is provided by San Mateo County Transit District (SamTrans), which operates bus service on two routes: Route 278 from Cañada College to Redwood City Transit Center, and Route 87 from Woodside High to Portola Valley, which connects to Route 278.

Environmental Resources and Natural Setting

Woodside boasts abundant biodiversity due to the interplay of a range of microclimates, topography, and soils in the region. The wooded slopes and stream corridors of the Santa Cruz Mountains form the western backdrop to the town, while the central part of Woodside is characterized by gentle oak and grassland foothills, as well as flatter valley areas with rich riparian habitat. Numerous creeks flow in and through Woodside, including Redwood Creek and many tributaries of San Francisquito Creek. The freshwater marsh near Searsville Lake in the southern portion of Woodside is also an important water feature. Residential development is limited in and near these resources to preserve existing biodiversity, including required setbacks along the creeks.

Flood hazard areas are generally concentrated around Searsville Lake; however, portions of Woodside downstream from Schilling Lake, Bear Gulch Reservoir, and Searsville Lake are potentially at risk of flooding in the event of seiche or dam failure. Alleviated flatland areas in central portions of the Town have been identified as areas of liquefaction hazard, while the areas of steep terrain in the Western Hills have been identified as areas of significant potential for seismically induced landslides. Additionally, several active and potentially active fault traces pass through Woodside, including the San Andreas, Cañada, and Pilarcitos Faults. Such features in the Town that bring risk of exposure to natural hazards, including flooding, wildfires, liquefaction, and landslides, are shown in Figure 2-2.

Utility Infrastructure

Water

California Water Service (Cal Water) Bear Gulch District supplies most of the water supply to the Town of Woodside, while the Emerald Lake Hills area of Woodside is served by Redwood City, who purchases their water from the Hetch Hetchy Regional Water System. The Bear Gulch District receives 85 to 95 percent of its daily supply from the San Francisco Regional Water System, with the balance supplied by surface water runoff from California Water Service Company's own watershed (Bay Area Water Supply and Conservation Agency, 2022).

Wastewater

Wastewater from Woodside is treated at the Silicon Valley Clean Water (SVCW) Wastewater Treatment Plant (WWTP). The wastewater at the SVCW WWTP undergoes primary, secondary (activated sludge), dual media filtration, disinfection, and dechlorination treatment before being discharged to a deep-water outfall in the San Francisco Bay. The SVCW WWTP has a capacity to treat 29.5 million gallons per day (MGD), but currently receives approximately 20.0 MGD from customers in the SVCW service area (Cal Water, 2021).

Stormwater

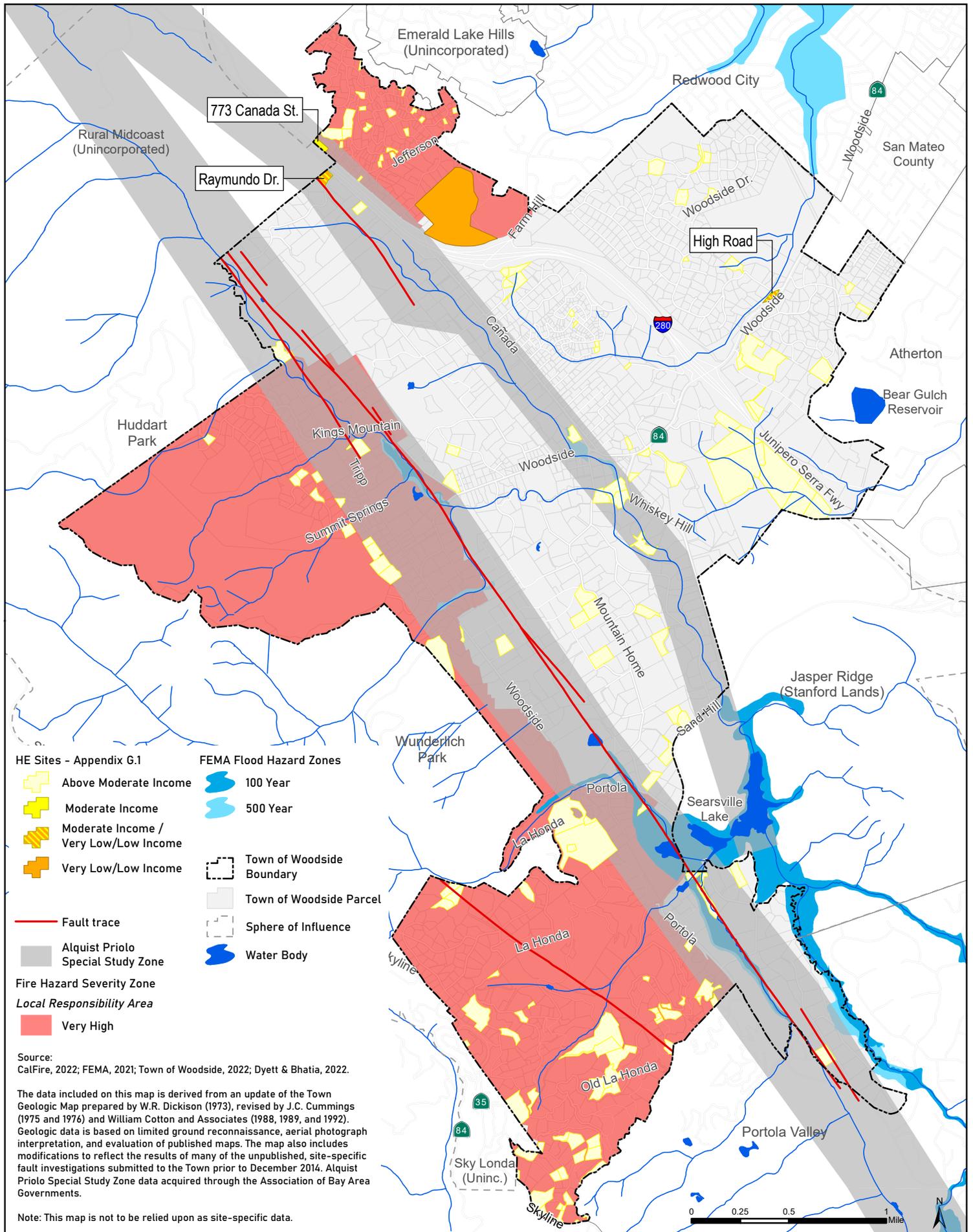
The storm drain system in Woodside consists primarily of open ditches, and some culverts which flow through private properties and public rights-of-way with limited sections of concrete-lined channels and pipes. The Town maintains drainage systems located within the public rights-of-way. The Town of Woodside reviews drainage and erosion control plans as part of a site development and/or building permit to ensure the latest Non Point Discharge Elimination System (NPDES) requirements are reflected and implemented as part of the permitted work.

Natural Gas and Electricity

Peninsula Clean Energy (PCE) provides electricity from clean energy sources, while Pacific Gas and Electricity (PG&E) owns the power lines and delivers the power generated by PCE. In addition, the Town of Woodside Public Works Department oversees the management, maintenance and construction of public facilities and infrastructure and the public rights-of-way. This includes oversight, management and supervision of private contractors who perform capital projects and maintenance on storm drains. Public Works operations staff provides maintenance and complete minor repairs of the Town's basic infrastructure including catch basin cleaning and storm drainage system and storm drain repairs.

2.2 Planning Context and Process

The Proposed Project involves updates to the Town of Woodside General Plan Housing Element. In compliance with State law, the Housing Element is being updated for the 6th and current cycle to account for changing demographics, market conditions, and projected housing need over an eight-year planning period that runs from 2023 through 2031.



Under State law, each city and county in California must plan to accommodate its share of the regional housing need - called the Regional Housing Needs Allocation (RHNA) - for the coming 8-year planning period. The State determines the estimated need for new housing in each region of California, based on population projections and other factors including rates of vacancy, overcrowding, and cost-burden. The various regional planning agencies then allocate a target to each city or town within their jurisdiction, considering factors such as access to jobs, good schools, and healthy environmental conditions. RHNA is split into four categories representing different levels of affordability, based on median income level in the county. The affordability categories are as follows:

- Very Low Income - Households making less than 50 percent of the average median income (AMI)
- Low Income – Households making 50-80 percent of AMI
- Moderate Income - Households making 80-120 percent of AMI
- Above Moderate Income - Households making more than 120 percent of AMI

As required by State law, the 2023-31 Housing Element Update includes a map of sites available for housing and an inventory of realistic capacity. Implementation of the Draft Housing Element would primarily involve facilitation of smaller scale housing construction in established neighborhoods on existing lots and infill sites.

HOUSING ELEMENT PLANNING PROCESS

Woodside Town Council established a Regional Housing Needs Allocation (RHNA) subcommittee consisting of members of the Planning Commission and Town Council to discuss the challenges of the RHNA allocation and develop strategies to meet the State-mandated requirements for the Housing Element. The RHNA subcommittee held a series of public meetings, working to identify sites for rezoning to meet the Town’s RHNA targets by income category, while considering the various environmental, fire hazard, and infrastructure constraints in Woodside.

In addition to the publicly noticed RHNA subcommittee meetings that included public participation, residents of Woodside participated in a series of countywide workshops conducted by “21 Elements”, a group aimed at supporting all twenty-one San Mateo County jurisdictions in developing, adopting, and implementing local housing policies and programs. Workshops in the form of issue-based webinars focused on affordability, housing and racial equity, the connection between housing and climate change, and planning new infill housing. The Town also participated in a meeting conducted jointly with the County of San Mateo and several other San Mateo County jurisdictions on developing ADUs.

Further, a Town-wide ADU survey was conducted to measure interest in constructing ADUs and to build an understanding of potential barriers to construction. The results of this survey helped inform the Town’s Housing Plan in the Housing Element. Multiple public hearings with the Planning Commission and Town Council were held for review and discussion of the Draft Housing Element. These hearings included multiple housing study sessions, a review of Housing Element chapters, discussion of RHNA subcommittee recommendations, and the preparation and passage of an ordinance in compliance with State requirements under SB 9 Code.

The Draft Housing Element was released for a 45-day public review period that ran from May 19, 2022, to July 1, 2022. The Town received a total of 65 comments by this deadline, and eight additional comments after the deadline. A formal response to comments was prepared and presented at a noticed Town Council hearing on July 12, 2022. At this meeting, the Town Council made changes to the Housing Element and added several new programs – in response to the public comments received. These changes were incorporated into the draft Housing Element on July 16, 2022.

The California Department of Housing and Community Development (HCD) has provided two iterations of comments on the draft Housing Element. To address such comments, the Town submitted the Draft 2 Housing Element for HCD review on March 15, 2023 and the Draft 3 Housing Element for HCD review on March 15, 2024. Prior to each resubmittal to HCD, the Town has posted the Response to HCD Comments Matrix for a 7-day public comment period.

2.3 Purpose and Objectives of the Proposed Project

All California cities and counties are required to have a Housing Element included in their General Plan which establishes housing objectives, policies, and programs in response to community housing conditions and needs. This Housing Element has been prepared to respond to current and near-term future housing needs in the Town of Woodside and provide a framework for the community's longer-term approach to addressing its housing needs.

The Housing Element contains goals, updated information and strategic directions (policies and implementing actions) that the Town is committed to undertaking. Housing affordability in San Mateo County and in the Bay Area as a whole is a critical issue. Over the past thirty years, housing costs have ballooned, driven by rising construction costs and land values, and homeownership in Woodside and throughout San Mateo County has become an ever more distant dream for many people, including hiring teachers, first responders, and others essential to the community.

This Housing Element touches many aspects of community life. It builds upon the goals, policies and implementing programs contained in the Town's 2015-2023 Housing Element and other Town policies and practices to address housing needs in the community. The overall focus of the Housing Element is to preserve and enhance community life, character, and serenity through the provision of adequate housing opportunities for people of all income levels, while being sensitive to the unique and historic character of Woodside that residents know and love.

PROJECT OBJECTIVES

The Housing Element's purpose is to address the housing needs and objectives of the Town and to meet the State Housing law requirements. The Town balances the objective to make all parts of the community accessible with the need to encourage development of housing in areas with few environmental constraints and hazards. The following are the primary project objectives for the Proposed Project:

- Ensure the Town meets its RHNA obligations and achieves certification of the Housing Element as required under State law;
- Integrate a wider variety of housing types to broaden housing choice and ensure that there are opportunities available to people of all incomes and abilities in Woodside;
- Facilitate housing development on sites that can be most feasibly developed within the 2023-31 Housing Element Cycle to ensure that the Town can make sufficient progress toward its RHNA obligations and remain eligible for State funding, including funding for local roadway maintenance; and
- Allow housing development that is subordinate, sensitive, and complementary to the natural environmental and rural setting of Woodside.

2.4 Proposed Project

This section provides a brief overview of key plan components, which integrate the objectives and include housing policies and implementing programs. Proposed Project strategies, policies, and implementing actions are considered throughout this EIR both in terms of their environmental impacts and, where relevant, in terms of how those policies may reduce or avoid potential impacts.

2023-2031 HOUSING ELEMENT

The Housing Element is a legally mandated part of the Woodside General Plan, published under separate cover. The Draft 2023-2031 Housing Element is an update to the current Housing Element prepared to respond to the requirements for the Sixth Housing Element Cycle, which runs from 2023 through 2031. The organization and content is described below.

The Housing Element is organized into the following three sections that comply with the requirements of State law:

- **Introduction** – this section emphasizes the importance of housing and shelter, provides an overview of Woodside’s demographics and its changing characteristics, summarizes a wide range of new housing and housing-related laws that have been adopted since the last Housing Element Update, and details the legislation that requires the integration of the Housing Element with the Safety Element and the Local Hazard Mitigation Plan.
- **Review of Cycle 5 (2015-2023) Housing Element** - this section reviews and evaluates the Town’s progress in meeting the objectives and implementing the Programs that were developed as part of the 2015-2023 Housing Element, and identifies the work still required to broaden the opportunities for affordable housing in Woodside.
- **Cycle 6 (2023-2031) Housing Element** – this section provides Woodside’s assigned Regional Housing Needs Allocation (RHNA) of 328 units, distributed by income level. It also includes a summary of Town collaboration with 21 Elements, a project aimed at supporting all twenty-one San Mateo County jurisdictions in developing, adopting, and implementing local housing policies and programs. This section also includes an overview of public engagement throughout the Housing Element process and the Woodside Fair Housing Assessment. This section details an inventory of land suitable and available for development of housing within the planning period, strategies for meeting RHNA allocation, and specific actions or programs to address the development, improvement, and conservation of housing to meet current and future needs. This includes goals, policies, and specific housing programs.

Additionally, there are twelve appendices that contain supporting data and information. Appendices are listed below:

- **Appendix A:** Definitions and Abbreviations
- **Appendix B:** Housing Needs Data Report
- **Appendix C:** SB 35 Statewide Determination Summary
- **Appendix D:** San Mateo County Multijurisdictional Local Hazards Mitigation Plan (LHMP), 2021
- **Appendix E:** ADU Affordability Report
- **Appendix F:** Housing Development Constraints, Development Costs, and Zoning Analysis
- **Appendix G:** Adequate Sites Inventory
- **Appendix H:** Public Engagement and Input Summary
- **Appendix I:** ADU Production in Woodside (2015-2021)

- **Appendix J:** Town of Woodside ADU Ordinances
- **Appendix K:** AFFH – Analysis of Impediments to Fair Housing Choice
- **Appendix L:** Inventory of Shelters and Services for the Homeless in San Mateo County

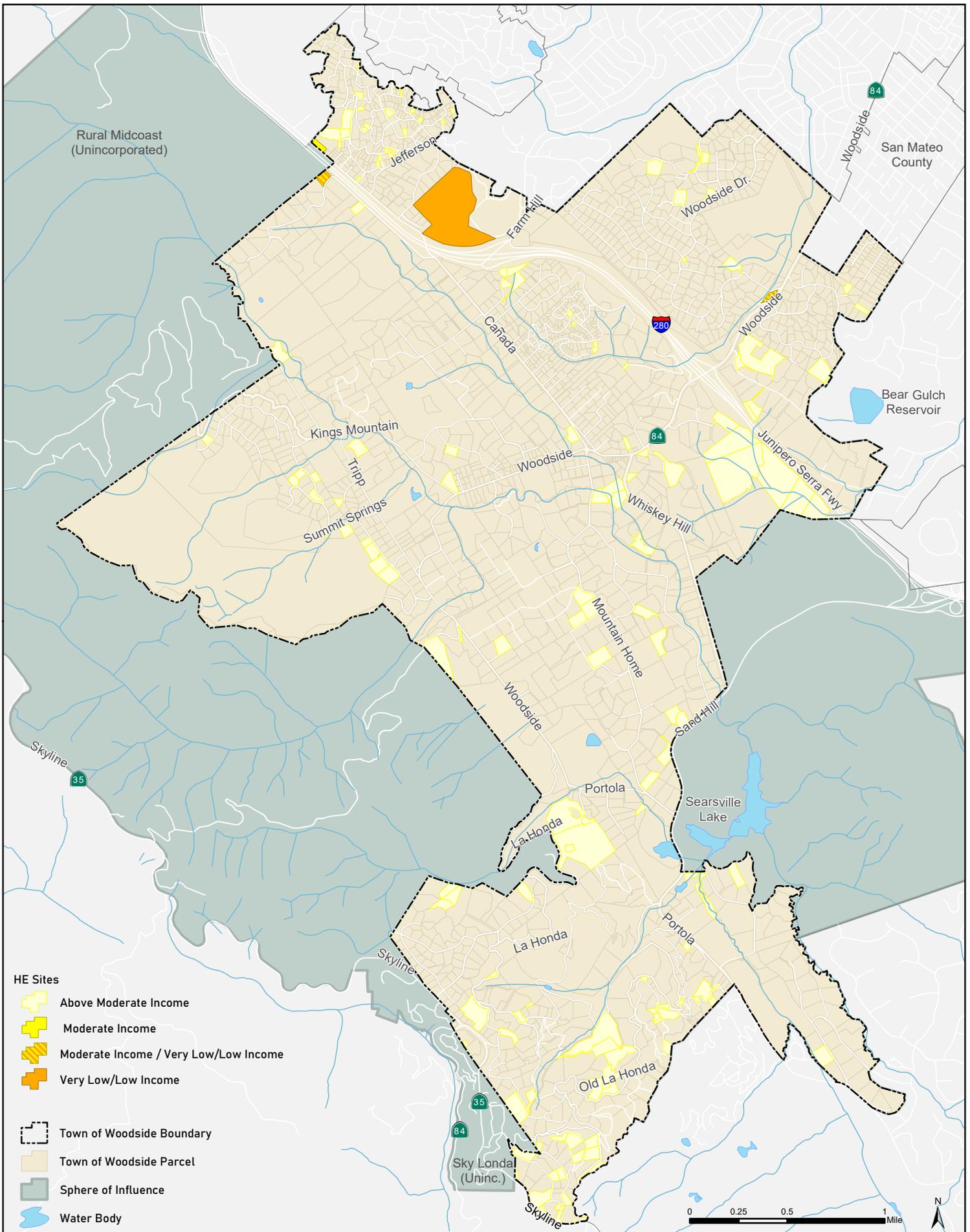
Inventory of Sites Available for Housing

As required by State law, the Draft Housing Element includes a map of sites available for housing and an inventory of capacity. The inventory demonstrates a total capacity of up to 423 new housing units, which is sufficient to meet the Town's RHNA obligations at all income levels with a buffer. The buffer is required to ensure that there is sufficient capacity to meet RHNA obligations during the planning period, in the event that some sites on the inventory develop at lower densities than envisioned. Implementation of the Draft Housing Element would primarily involve facilitation of smaller scale infill development in established residential neighborhoods, with some additional multi-family housing to provide varied housing types. Smaller-scale development includes vacant and underutilized single-family residences and development of accessory dwelling units (ADUs).

As shown on Figure 2-3 and Table 2-1 below, the inventory anticipates construction of 149 new single-family homes on residentially zoned properties throughout Woodside, including 105 vacant parcels and 44 underutilized parcels. Underutilized sites have some structures and improvements such as sheds, solar panels, animal enclosures, vineyards, parking lots or driveways, or old barns, but do not have a single-family residence, other type of residential unit, or substantial improvement(s). In some cases, the underutilized parcels adjoin a parcel with a single-family residence and are used for additional yard space. Based on the annual rate of construction permits issued for ADUs by the Town since 2018, it is projected that 15 new ADUs will be constructed on existing single-family lots in Woodside each year over the course of the 8-year planning period, for a total of 120 new ADUs. By virtue of their smaller size, many ADUs may offer rents affordable to lower and moderate-income households. New single-family homes would provide additional housing opportunities for above moderate-income households.

Additionally, to help meet the Town's RHNA obligations for lower income households, the inventory includes that four sites will develop with multi-family housing:

- **Housing at Cañada College.** San Mateo County Community College District (District) adopted a Districtwide Facilities Master Plan (FMP) in June 2022 that envisions the construction of affordable housing units on the Cañada College site in Woodside. The District intends to proceed with construction as soon as funding is available. The MFRD Overlay Zone that currently applies to the site permits multi-family housing development. Through Program H3.2b, the Town will revise the MFRD zone unit maximum density to 20 units per acre for housing affordable to lower income households. Allowing increased housing density to further facilitate residential development at the site at the density and locations proposed is consistent with the Town Housing Element and District FMP. The Proposed Project includes Program H3.1a, under which the Town will assist the District in obtaining financing to the extent feasible by the Town, and Program H3.1b, under which the Town commits to reducing the complexity of the entitlement process for this overlay zone. The site is served by public transit, including San Mateo County Transit District (SamTrans) Route 278 with service to the Redwood City Transit Center, as well as by water, sewer, and stormwater facilities. In conversations with Town staff, the District has indicated that construction of 75-80 units that would be affordable to households making less than 80 percent of the San Mateo County AMI is a reasonable assumption. Therefore, the inventory assumes 75 lower income RHNA units on this site over the planning period.



2-3 Sites Available for Housing

Town of Woodside

- **773 Cañada Road (APN: 068-100-220).** This approximately 5-acre site located north of Cañada College is under private ownership. The property owner is actively exploring residential development opportunities, including the development of multi-family housing units on an approximately 1-acre portion of the site that fronts Cañada Road. Water service is available, and the site is adjacent and eligible to connect to the Town Center Sewer District with necessary approvals and an amendment to the Emerald Lake Hills Specific Plan; therefore, adequate utilities are available and accessible. To facilitate residential development at this location, the Proposed Project includes Program H2.1a, under which the Town will rezone the site to permit residential development at 20 dwelling units per acre on the approximately 1-acre portion. In conversations with Town staff, the owner has indicated a willingness to make the new housing units available to households making less than 120 percent of the San Mateo County AMI through long-term affordability agreements. Therefore, the inventory assumes 16 moderate income RHNA units on this site over the planning period.
- **Raymundo Drive (APN: 072-041-040).** This Town-owned site is 1.77 acres in size and currently zoned Open Space (OS). The eastern portion of the site is currently used as a Town Public Works corporate yard for staging of landscape materials. The western side of the property is a fenced pasture used by an adjacent property owner. The Hermit Fault runs along the western boundary of the site, and the Hermit Fault setback zone extends into the site. Water and sewer service are accessible for the site. To facilitate development of affordable housing on this site, the Proposed Project includes two programs: through Program H2.1a, the Town will rezone the site to permit residential development at 20 dwelling units per acre, and through H4.2c, the Town will partner with an affordable housing developer for the construction of workforce housing. A total of 17 multi-family housing units are projected on this site.
- **High Road (APN: 069-170-450).** This Town-owned site is 1.055 acres in size, vacant, and currently zoned Open Space for Preservation of Natural Resources (OSN). The southern portion of the site is sloped as it abuts Highway 84/Woodside Road, but the site does not have any identified environmental constraints. It is located approximately 0.5 miles from Woodside High School, which is accessible via striped Class II bicycle lanes on Woodside Road as noted in the Circulation Element. The site is located within the CalWater Service Area and the Redwood Creek Sewer Assessment District. Therefore, water and sewer service are accessible for the site. A PG&E gas transmission line is located with the Todo El Mundo public right-of-way adjacent to the north side of the site which shall be avoided with any future development. To facilitate development of affordable housing on this site, the Proposed Project includes two programs: through Program H2.1a, the Town will rezone the site to permit residential development at 20 dwelling units per acre, and through H4.2c, the Town will partner with an affordable housing developer for the construction of workforce housing. A total of 16 multi-family housing units are projected on this site.

Table 2-1: 2023 – 2031 Woodside RHNA Plan

	Low and Very Low Income	Moderate Income	Above Moderate Income	Total
Current Zoning Sites				
Vacant Single-Family Sites			105	105
Non-Vacant Single-Family sites			44	44
Pipeline Projects	6	3	21	30
Cañada College	75			75
ADUs @ 15 units annually	72	36	12	120
Rezoning Sites				
773 Cañada Site @ 20 units/acre		16		16
High Road @ 20 units/acre	11	5		16
Raymundo @ 20 units/acre	12	5		17
Total	176	65	182	423
RHNA Allocation	142	52	134	328
RHNA Buffer @ 20%	28	10	27	65

Source: Town of Woodside, 2022

Action Plan

Additionally, the Proposed Project incorporates six goals, supported by policies and programs to provide housing types available for households of all income levels and demographics, while balancing the objectives of State and Federal legislation enacted to preserve habitats for listed threatened and endangered species.

- **Goal H1, Increase Opportunities for Development of Accessory Dwelling Units (ADUs) and Junior Accessory Dwelling Units (JADUs)**, is supported by policies and programs that seek to minimize barriers to the construction of ADUs, by providing outreach to residents encouraging development of ADUs. Programs include preparation and distribution of brochures with information on ADUs/JADUs, an ADU survey, and consideration of modifying local regulations to permit additional ADUs on properties exceeding two acres.
- **Goal H2, Affirmatively Further Fair Housing (AFFH)**, outlines programs to provide opportunities for various housing types with access to high resource area amenities (schools, libraries, retail, restaurants, and services), and transit routes: including bus stops, designated bicycle lanes, and Safe Routes to School pathways. Programs include consideration of revising SB 9 unit development standards.
- **Goal H3: Support Opportunities for High Density Housing**, details the support of new housing at Cañada College, as well as the rezoning of three sites, Raymundo Drive at Runnymede Road, High Road at Woodside Road, and 773 Cañada Road, to meet RHNA targets, and provide varied housing types.
- **Goal H4: Promote the Availability of Housing for Special Needs Groups**, identifies opportunities to promote affordable housing for persons with disabilities of all types (not limited to physical disabilities), seniors, students, service personnel, caretakers, equestrian managers/employees, and public sector employees.

- **Goal H5: Plan for a Resilient Community**, provides programs to minimize damage from natural disasters and to provide adequate utilities, such as updating the Very High Fire Hazard Severity Zones (VHFHSZ) Map and coordinating with CALWater (California Water Service) to ensure adequate water supplies.
- **Goal H6: Conserve and Rehabilitate the Existing Housing Stock and Develop New Housing Stock**, highlights programs that will conserve and rehabilitate the existing housing stock, such as continuously applying the California Building Code, maintaining and improving housing, enforcing housing standards, providing exceptions and variances, and promoting sustainability including energy efficiency.

GENERAL PLAN AMENDMENT

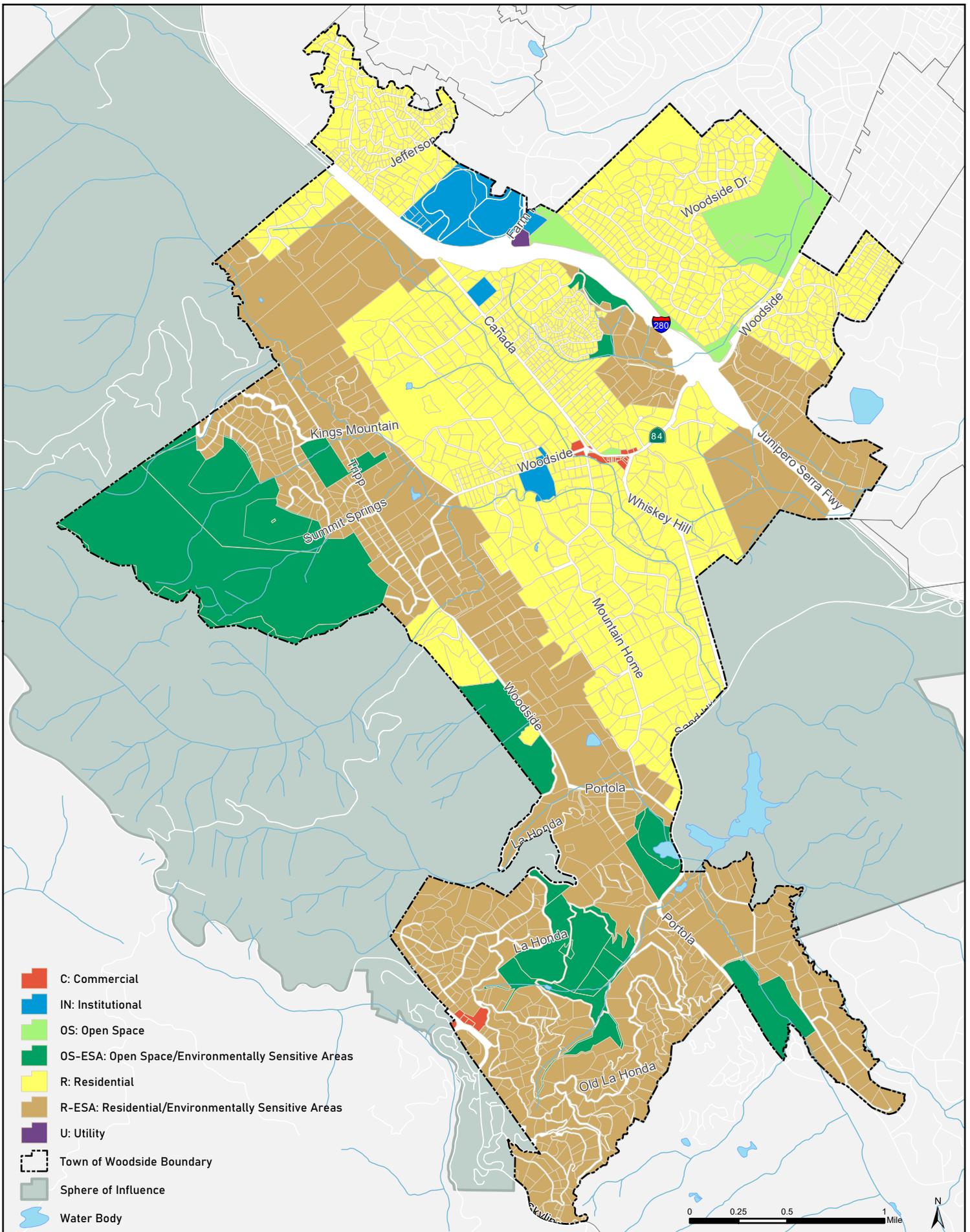
Implementation of the Proposed Project would require a General Plan amendment to change the General Plan Land Use designation of the High Road and Raymundo Drive sites to permit residential uses. The Raymundo Drive site is currently designated OS-ESA on the General Plan Land Use Map, while the High Road site currently has an OS General Plan Land Use Designation. Both sites require a General Plan Land Use Designation change to Residential, which permits residential development. The proposed General Plan Land Use map reflecting these changes is included as Figure 2-4.

EMERALD LAKE HILLS SPECIFIC PLAN AMENDMENT

The Emerald Lake Hills Specific Plan, adopted in 1995, limits the extension of sewer service to existing developed lots with failing or problematic septic systems. The Proposed Project would update policies and action items in the Specific Plan to permit the extension of sewer service to the 773 Cañada Road site.

ZONING AMENDMENTS

Amendments to the Zoning Ordinance of the Town of Woodside, adopted into the Municipal Code as Title XV, Chapter 153, would also be required for implementation of the Proposed Project. Specifically, Section 153.101 “Establishment of Zoning Districts” would be amended to create a new Multi-Family Residential (MF) Zoning District, which would apply to the High Road, Raymundo Drive, and 773 Cañada Road sites. In addition, the Zoning Map revision would expand the multi-family overlay zone across the entire Cañada College Campus and change the acronym for the Multi-Family Residential Development Overlay Zone from MFRD to MFOZ. The Zoning Map designation for portions of Cañada College Campus would also be amended from MFRD to a new Multi-family Residential Zone (MFRZ). Table A-1: Permitted Uses and Structures in Residential and Commercial Zoning Districts would be amended accordingly to define the permitted uses within MF and Multi-Family Residential (MFRZ) zoning districts, and Section 153.110 would be updated with standards for the new districts.



2-4 Proposed General Plan Land Use Map

Town of Woodside

OBJECTIVE DESIGN STANDARDS

Implementation of the Proposed Project also involves the adoption of Objective Design Standards (ODS) to integrate high density housing onto the four multifamily sites identified in the Housing Element: High Road, Raymundo Drive, 773 Cañada Road, and Cañada College. The ODS address setbacks, building spacing, site access, fences and walls, open space, parking, massing, architectural design, entries, and roof design. The ODS would permit density of at least 20 dwelling units per acre on each of the four sites with controls for massing, bulk, and height. The ODS are customized to the specific context of each of the four sites. A summary of the differences is as follows:

- **Raymundo Drive:** Setbacks are generally 30 feet from adjacent parcel lines; lot coverage shall not exceed 60 percent; driveways shall establish no more than two access points to Raymundo Drive; a minimum of 60 percent of all setback areas shall be pervious area; fences are limited to six feet in height and walls to four feet in height with exceptions; 100 square feet of open space per dwelling unit shall be provided at minimum; two parking spaces per unit in addition to 0.25 spaces per unit for guests; 40 foot maximum building height. Uncovered parking areas are prohibited between Raymundo Drive and any building.
- **High Road:** Setbacks are 20 feet as opposed to 30 feet on the Raymundo Drive site; parcel coverage is limited to 70 percent; a minimum of 60 percent of all setback areas shall be pervious area; fences and walls are maximum six and four feet respectively; 100 square feet of open space per dwelling unit shall be provided at minimum, parking is two spaces per unit in addition to 0.25 spaces per unit for guests, and building heights are capped at 35 feet. There are no prohibitions on uncovered parking. Additional building restrictions apply along the Woodside Road frontage due to a PG&E easement.
- **773 Cañada Road:** Setbacks from Cañada Road are 10 feet, 20 feet along the access road and 20 feet along the northeast and northwest boundary of the property; lot coverage is limited to 60 percent maximum; a minimum of 60 percent of all setback areas shall be pervious area; there shall only be one drive access from Cañada Road; requirements for fences, walls, parking and open space are the same as for High Road; building heights are capped at a maximum of 35 feet; parking is two spaces per unit in addition to 0.25 spaces per unit for guests; and there are no prohibitions on uncovered parking.
- **Cañada College:** Standards specify the location of buildings on the site and distance between buildings; lot coverage at this parcel is limited to 60 percent; driveways may not be located between a road and a building façade; standards for fences, walls and common open space are the same as for High Road and Raymundo Drive; parking is required at 1.5 spaces per bedroom with an additional requirement that bicycle parking is at least 5 percent of the total parking requirement; building heights are capped at 40 feet. No surface parking area shall exceed 10,000 square feet, and uncovered parking areas with at least ten consecutive spaces shall include a landscaped area that is a minimum of six feet in width at intervals of no more than six consecutive parking stalls.

2.5 Intended Uses of this EIR

This EIR is intended to review potential environmental impacts associated with the adoption and implementation of the Proposed Project and determine corresponding mitigation measures, as necessary. This EIR is a program-level EIR and does not evaluate the project-specific impacts of individual

developments or projects that may be allowed under the Proposed Project. Pursuant to CEQA Section 15152, subsequent projects that are consistent with the Proposed Project may “tier” from this EIR, relying on the environmental analysis and mitigation measures it contains in order to streamline environmental review or to focus on project-specific environmental effects not considered in this EIR, if any. Additionally, subsequent projects that satisfy the requirements of CEQA Guidelines Sections 15168 or 15183 may be eligible for streamlined environmental review.

This EIR serves as the environmental document for all discretionary actions associated with development under the Proposed Project. This EIR is intended to be the primary reference document in the formulation and implementation of a Mitigation Monitoring and Reporting Program (MMRP) for the Proposed Project. This EIR is also intended to assist other responsible agencies in making approvals that may result from the Proposed Project. Federal, State, regional, and local government agencies that may have jurisdiction over development proposals in the Planning Area include:

- U.S. Army Corps of Engineers
- Federal Emergency Management Agency
- U.S. Fish and Wildlife Service
- California Department of Fish and Wildlife
- California Department of Transportation
- California Native American Heritage Commission
- Metropolitan Transportation Commission
- Bay Area Air Quality Management District
- San Francisco Bay Regional Water Quality Control Board

The Proposed Project would require the following approvals and discretionary actions by Woodside:

- Adoption of the Proposed Project
- Certification of the EIR pursuant to CEQA
- Adoption of ordinances, guidelines, programs, and other mechanisms for implementation of the Proposed Project.

3.1 Aesthetics

This section evaluates the potential impacts to aesthetics that could arise from implementation of the proposed Housing Element update (HEU). The analysis includes possible impacts to scenic resources, visual character, and visual quality, as well as those arising from the possible introduction of new sources of light and glare. Scoping comments related to aesthetics and visual resources raised concerns related to both the height of potential new development that could occur under the HEU as well as a general incompatibility between multi-family residential uses and the existing character of the Town.

Environmental Setting

PHYSICAL SETTING

Most communities identify scenic resources as important visual assets that contribute to community identity. These resources can include landforms, trees, water features, and the built environment in so far as they enhance and define the visual character of a landscape. Scenic resources include natural and open spaces, as well as the built environment, particularly if certain architecture is of historic or artistic value.

Visual quality is defined as the overall visual impression or attractiveness of an area based on the scenic resources, both natural and built. The attributes of visual quality include variety, vividness, coherence, uniqueness, harmony, and pattern. Viewshed is a term used to describe a range of resources and their context that relate to what people can see in the immediate environment in terms of foreground, middle ground, and background distances.

Impacts to visual quality are perceived by different viewer types and to different degrees, depending on the viewer exposure. Different land uses, such as open space or commercial districts, derive value from the quality of their settings and, for the purposes of this study, include regionally designated scenic highways, town gateways, and surrounding land features. Viewers driving in the town might be exposed to the dramatic hills or the marshlands along the Bay as they travel. Their exposure would vary based on proximity and ability to see the viewshed. Scenic resources are of particular importance relative to the way viewer sensitivity may be impacted. This sensitivity is determined by two measures: exposure and awareness. Exposure is the relative proximity of potential viewers to a given project implemented under the Proposed Project, and awareness indicates the attention and focus viewers bring to the experience of the area.

Existing Visual Conditions

Woodside is a residential community distinguished by its rural and suburban character, scenic vistas, natural landscape, and equestrian heritage. The existing visual character is distinguished by gentle oak and grassland foothills, as well as flatter valley areas with rich riparian habitat, and views of the western hillsides. Numerous creeks flow in and through Woodside, including Redwood Creek and many tributaries of San Francisquito Creek.

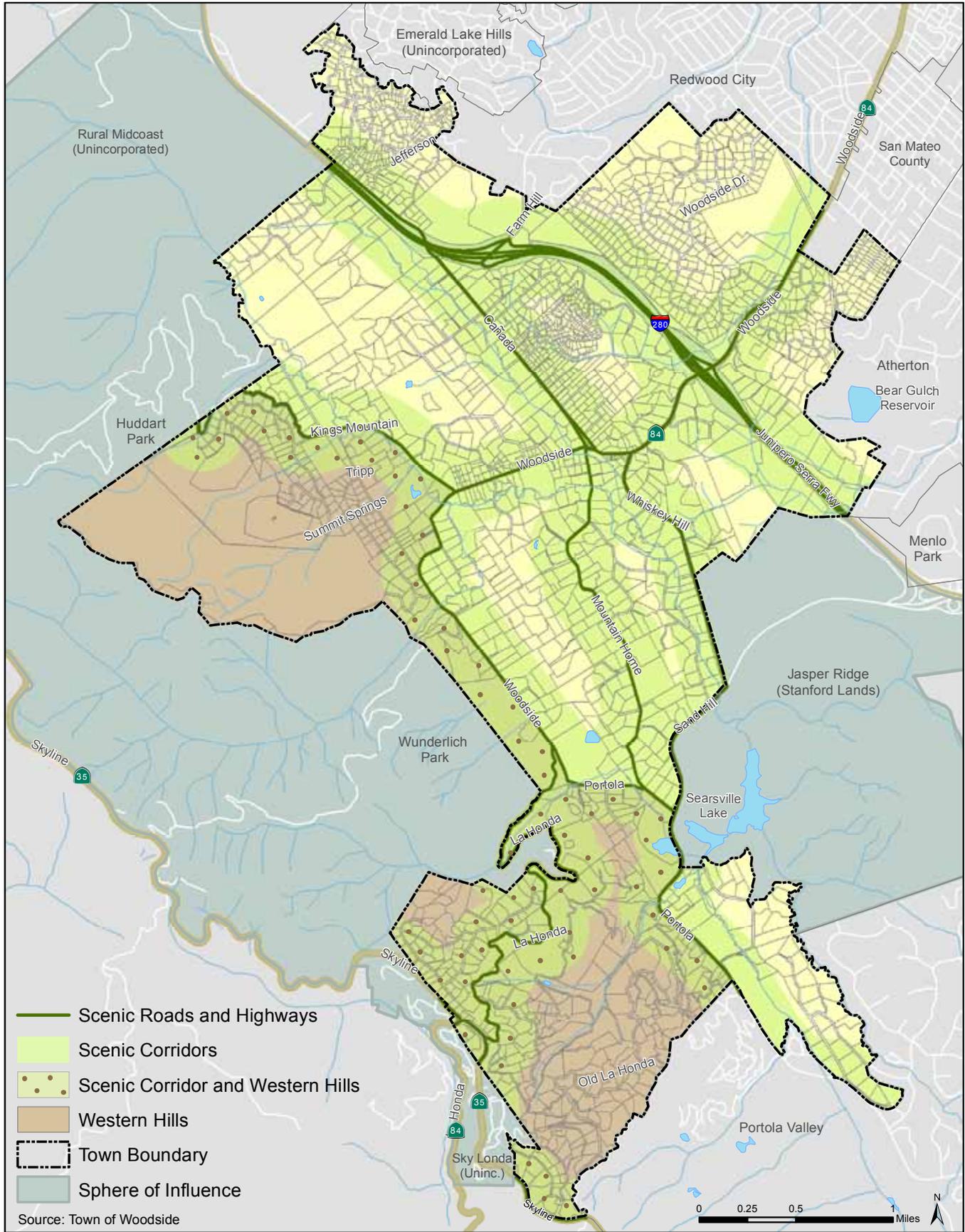
Scenic Corridors

Two State-designated scenic highways (Interstate 280 and State Highway 35) run through the Planning Area. Additionally, the Town's General Plan 2012 designated several Town scenic roads and identifies other scenic corridors as shown in Figure 3.1-1, which is Map CL2 from the Town's current General Plan. Town scenic roads are officially designated by the Woodside Town Council and include Cañada Road, Kings Mountain Road, La Honda Road, Mountain Home Road, Portola Road, Sand Hill Road, Whiskey Hill Road and Woodside Road (State Highway 84). The 2012 General Plan also contains measures to protect such corridors, including Policy CL2.2 and Strategy LU1.3b. Additionally, the Town has adopted Residential Design Guidelines for the development of single-family dwellings, and Objective Design Standards for SB 9 projects, to promote the integration of new homes and accessory structures into the natural landscape.

Light and Glare

Glare refers to the discomfort or impairment of vision experienced when a person is exposed to a direct or reflected source of light, causing objectionable brightness greater than that to which the eyes are adapted. Sources of glare in urban settings include sunlight reflected in the windows of buildings, including glass façades, and cars. Existing development and motor vehicles produce light and glare throughout the Town of Woodside. Existing sources of light are from residential and commercial development in the Town as well as vehicle lights, and other typical sources of light in urban or suburban areas. Sources of glare include both windows on structures and car windows and windshields.

Map CL2: Scenic Corridors



REGULATORY SETTING

Federal

No existing federal regulations pertain to visual resources in the Town.

State

Caltrans

Caltrans defines a scenic highway as any freeway, highway, road, or other public right-of-way that traverses an area of exceptional scenic quality. Suitability for designation as a state scenic highway is based on vividness, intactness, and unity of the view, as described in Guidelines for Official Designation of Scenic highways (Caltrans 1995).

- Vividness is the extent to which the landscape is memorable. This is associated with the distinctiveness, diversity, and contrast of visual elements. A vivid landscape makes an immediate and lasting impression on the viewer.
- Intactness refers to the integrity of visual order in the landscape and the extent to which the natural landscape is free from visual intrusions, such as buildings, structures, equipment, and grading.
- Unity describes the extent to which development is sensitive to and visually harmonious with the natural landscape.

Woodside General Plan 2012

The Town's current General Plan addresses visual character and quality and scenic resources primarily in the Land Use Element, Open Space Element, and Circulation Element. The Town of Woodside 2012 General Plan includes the following goals and policies related to aesthetics and visual character:

Goal LU-1: Preserve and enhance Woodside as a scenic, rural residential community.

Policy LU-1.1 Give high priority to preservation and conservation of natural resources through the development of residential design guidelines, updating regulations, and dedicating easements for open space, conservation, scenic resources, and trails.

Policy LU-1.2 Limit density of development by updating regulations and encouraging the keeping of livestock, particularly horses.

Policy LU-1.3 Maintain community aesthetics through residential guidelines, scenic corridor architectural standards, fence and gate design, and code compliance.

Policy LU-1.4 Emphasize residential land uses consistent with rural environment by updating regulations for large house size exceptions and number of allowable accessory structures on a single parcel.

Policy LU-1.5 Thoroughly evaluate changes to parcel boundaries by updating regulations of lot line adjustments and lot mergers to address inappropriate development potential.

Policy LU-1.6 Emphasize commercial land uses which serve the day-to-day needs of residents by encouraging local-serving commercial uses, updating area plans with specific recommendations to encourage multiple modes of transportation, and update regulations to allow a limited number of bed and breakfast facilities in commercial areas.

Policy LU-1.7 Limit public and private institutions to those required for the well-being of the community.

Policy LU-1.8 Encourage and plan parks and recreation in keeping with the rural setting by providing recreation programs and cooperating with partners.

Policy LU-1.9 Monitor and participate in the planning activities of adjacent lands through cooperative planning efforts.

Policy LU1.10 Maintain demographic data by updating the Town website as appropriate and maintaining current demographic data.

Goal CL-2: Maintain a safe and convenient roadway system while preserving the Town's rural and scenic environment.

Policy CL2.1 Maintain and improve Town roadways consistent with a rural and scenic environment through design principles and standards, the improvement of road safety, and the maintenance of roadways.

Policy CL2.2 Protect and designate scenic corridors through development review and designating State Highway 84 as an official State scenic highway in addition to Skyline Boulevard and I-280.

Goal OS-1: Conserve, protect, and enhance open space system

Policy OS1.1 Review all development to ensure preservation of open space by updating and preparing guidelines and regulations, conserving wildlife corridors, and protecting conservation easements.

Policy OS1.2 Enhance connectivity between open space areas by updating guidelines to provide clear direction on site planning.

Policy OS1.3 Expand the open space system by accepting open space easements and development rights granted to the Town, rezoning open space uses and lot mergers as requested by property owners, and encourage programs that expand open space such as the Backyard Habitat Program.

Policy OS1.4 Preserve open space for the protection of public health and safety by refining Town environmental constraint maps and data, ensuring applications accurately show constraints, and encouraging dedication of high hazard areas as Open Space.

Policy OS1.5 Protect scenic resources by updating the Design Guidelines.

Policy OS1.6 Provide for open space for recreation by using project review and educational strategies.

Policy OS1.7 Establish educational programs through open space outreach and backyard habitat programs.

Policy OS1.8 Utilize incentives for open space preservation through economic, financial, funding, recognition, and other strategies.

Policy OS1.9 Partner to acquire resources through open space partnerships and open space grants.

Town of Woodside Municipal Code

The Town's Municipal Code, specifically Chapter 153 (Zoning) protects the rural residential character of the Town, preserves its rural character, and preserves the beauty of the Town's setting to ensure the conservation of its scenic and natural resources (Town of Woodside Municipal Code, Section 153.002). Other provisions throughout the zoning ordinances address development standards such as setbacks and building and site design.

Specifically, Section 153.002 of the Municipal Code identifies the following objectives:

(A) To guide and regulate current and future growth and development and to protect the established rural and suburban character of the *Town* in a manner consistent with the General Plan;

(B) To preserve the *Town's* primarily single-family character by prohibiting inharmonious influences and intrusions;

(C) To promote a safe and effective circulation system, including roads and trails, consistent with the *Town's* residential quality;

(D) To provide adequate light, air, privacy, and access to property;

(E) To control and minimize stormwater runoff, soil erosion, and stream and drainage channel siltation;

(F) To secure safety from fire, earth movement, and other natural and artificial hazards;

(G) To preserve the rural character of the *Town* by ensuring adequate *open space* to prevent excessive population concentrations and congestion;

(H) To preserve the beauty of the *Town's* setting and ensure the conservation of its scenic and natural resources; and

(I) To comply with California Government Code, § 65910 which requires every city and county to adopt an *open space* zoning ordinance consistent with the *open space element* of the General Plan.

The Town's Municipal Code also includes evaluation criteria related to site planning, building design, and landscape elements (Sec 153.915 (D)). It regulates sign standards in Section 153.501 for the purpose of maintaining the attractive aesthetic quality of the Town by ensuring they are well designed, clearly legible, visually pleasing, and of an adequate size. Additionally, the Town intends to adopt objective design and development standards for multi-family development.

Town of Woodside Residential Design Guidelines

Adopted in 2012, the Residential Design Guidelines provide guidance about ways to locate and design developments to maintain the character of the community and its natural setting. The document include guidelines and diagrams for community character, site planning, building design, and landscape elements. The guidelines are used by Woodside's Planning Department, Architectural and Site Review Board (ASRB), and Planning Commission to evaluate the merits of proposed residential development applications subject to discretionary review throughout Woodside. Any outdoor lighting of residential athletic courts or recreational facilities, construction within Scenic Corridors or the Western Hills area (which also requires Planning Commission review if development exceeds 2,000 square feet or 30 percent of the total floor area allowed for the property), gates, fences, or entries, all accessory living quarters, and other projects upon referral must be reviewed by the ASRB for consistency with the Guidelines. The following guidelines are relevant to ensuring there is no impact to aesthetics in Woodside:

Section 1: Community Character

1.1 Rural Character and Community Aesthetics. Properties shall be developed in a manner that is in keeping with the rural character and aesthetics of the Town through minimizing disturbance to natural terrain, complimenting the natural environment and site conditions, supporting equestrian attributes, communicating with neighbors about offsite impacts, and utilizing sustainable practices.

1.2 Scenic Corridors and Vistas. Properties shall be developed in a manner which respects the character of scenic corridors and vistas through strategies to keep development perceived as natural and rural, consider the cumulative impacts of development along a scenic corridor, respect vistas from adjacent properties toward the Western Hills, the bay, and valleys, and protect vistas of the Western Hills by designing structures that blend into the hillside and woodlands.

1.3 Natural Environment. Properties shall be developed in a manner that preserves natural features through the protection of areas of ecological significance and optimization of opportunities to preserve open space, trails, and scenic easements.

Section 2: Site Planning

2.1 Site Constraints and Features. Building location and site improvements shall be based on a clear understanding of the property's natural features, regulatory constraints, and relationships to adjacent properties.

2.2 Natural Feature Conservation. Site development shall conserve the property's open space, natural features, vegetation, and wildlife by subordinating development to the site's natural conditions.

2.3 Site Usage and Building Siting. Residential and accessory uses shall be located to respect and preserve Woodside's rural residential character, and maintain the visual continuity of natural landforms.

2.4 Site Circulation. Driveways, garages, parking areas, trails, and pathways shall be located and designed to be safe, minimally visible from the roadway, and subordinate to the site's natural features.

2.5 Neighborhood and Community Capability. The location, scale, and orientation of site improvements shall complement and be consistent with neighborhood and community development patterns.

2.5 Fire Safe Design. Site planning shall consider the relationship between buildings and high fuel load vegetation.

2.6 Sustainability. Site planning shall incorporate sustainable strategies to conserve and minimize consumption in the construction of structures.

Section 3: Building Design

3.1 Setting and Architectural Style. The architectural design shall be tailored to lot size, terrain, vegetation, and other natural and neighborhood conditions.

3.2 Building Form. Building form shall be architecturally cohesive and understood.

3.3 Materials, Color, and Details. Material, color, and detail shall be used to enhance the architectural style in a well-composed, understated manner. This includes that exterior building lighting should be minimized and designed to prevent offsite glare as seen from adjacent properties, the roadway, and distant views.

3.4 Fire Safety. Adhere to safety regulations, while maintaining the rural character of Woodside.

3.5 Sustainability. Sustainable building practices shall be considered in project design.

Section 4: Landscape Elements

4.1 Grading, Drainage, and Hardscape. The landscape design shall minimize grading, allow for appropriate drainage, minimize paving, and preserve the natural and scenic character of Woodside.

4.2 Planting Design. The planting design shall respect and maintain existing native and mature vegetation, shall be informal in design, and shall be in keeping with the rural character of Woodside.

4.3 Fences. Fencing shall be open in design and compatible with the rural character of Woodside.

4.4 Entry Features. The design of entry features shall be simple, modest, and understated.

4.5 Lighting. Woodside values dark night skies and limited lighting. Lighting on private property, especially if visible offsite, shall be minimized to maintain the rural experience.

4.6 Fire Safe Design. The landscape design shall include fire resistant plantings and the development of a defensible space around structures by elimination of overgrown plant materials with high fuel content, while preserving the natural environment.

4.7 Sustainability. Landscape design shall incorporate sustainable strategies to maximize water efficiency and preserve open space.

Impact Analysis

For the purposes of this EIR, a significant impact would occur if implementation of the Proposed Project would:

- Criterion 1: Have a substantial adverse effect on a scenic vista;**
- Criterion 2: Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway;**
- Criterion 3: In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings. (Public views are those that are experienced from publicly accessible vantage point). Or, in urbanized areas, conflict with applicable zoning and other regulations governing scenic quality; or**
- Criterion 4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.**

METHODOLOGY AND ASSUMPTIONS

Appreciation of aesthetics and visual resources is generally subjective by nature, and therefore the extent of visual impact associated with adoption and implementation of the Proposed Project can be difficult to quantify. In addition, it is difficult to estimate the impact future development would have on scenic resources, since individual development projects can be designed to be compatible with and/or enhance the aesthetic quality of an area. As such, this analysis was based on the overall amount of new development at buildout of the Proposed Project, the potential location of new development, and policies and standards in the Proposed Project.

New development anticipated under the Proposed Project would primarily be focused on existing vacant and underutilized lots throughout the Planning Area. Pursuant to CEQA Section 15303, the

State has determined that most of the buildout of the Proposed Project (small-scale infill housing, typically of not more than three single-family residences or multi-family residential structures designed for not more than six dwelling units) would not have a significant effect on the environment. Larger scale projects anticipated with buildout of the Proposed Project, including the Cañada College site, the Town-owned High Road and Raymundo sites, and the 773 Cañada site, could have impacts on aesthetic resources, which are examined below.

Relevant Proposed Project Goals and Policies

The Proposed Project includes programs for a mix of housing types to meet the Cycle 6 RHNA allocation. These different housing types and levels of development anticipated during the Proposed Project include Accessory Dwelling Units (ADUs), Junior Accessory Dwelling Units (JADUs), land divisions, and higher density housing projects at Cañada College, a privately-owned parcel, and two Town-owned sites. The following policies from the Draft Housing Element Housing Action Plan are relevant to maintaining the aesthetics of Woodside:

Goal H6: Conserve and rehabilitate the existing housing stock and develop new housing stock:

Policy H6.1a: Apply California Building Code: The Town works to preserve its housing stock and its historic structures. Effective January 1, 2023, all projects that are submitted for building, plumbing, electrical and mechanical permits are required to comply with the 2022 California Code of Regulations (CCR), Title 24. The Town also requires preparation of a historic assessment for all structures that are 50 years or older that are proposed for demolition, which the Town pays for (unless it is a qualifying historic structure for which an extensive report is required).

Policy H6.1b: Maintain and improve housing: The Town works to preserve its existing housing stock. During the first seven years of Cycle 5 (2015-2021), the Town issued 372 permits to remodel/repair existing residences and 139 permits to add additions/repair main residences. The Town also issued one permit to convert an existing residence to an ADU and one permit to convert an existing barn to an ADU. The Town issued two permits for remodeling/repairing existing ADUs. The Residential Design Guidelines support reuse of existing buildings, portions of buildings, and building materials. The Guidelines also support preservation and adaptive reuse of historic structures.

Policy H6.1c: Enforce housing standards: The Town responds to complaints related to compliance and works with residents to address issues related to public health and safety. The Town maintains a list of housing resources on its website, including those related to loans for rehabilitation projects (San Mateo County Home Repair Program).

Policy H2.2a: Continue to encourage and facilitate home rehabilitation: As indicated under H2.1 above, the Town works to preserve its existing housing stock. During the first seven years of Cycle 5 (2015-2021), the Town issued 372 permits to remodel/repair existing residences and 139 permits to add additions/repair main residences. The Town also issued one permit to convert an existing residence to an ADU and one permit to convert an existing barn to an ADU. The Town issued two permits for remodeling/repairing existing ADUs. The Residential Design Guidelines support reuse of existing buildings, portions of buildings, and building materials. The Guidelines also support preservation and adaptive reuse of historic structures.

Policy H2.2b: Provide exceptions and variances: The Town processes building permits for additions and remodels on an ongoing basis, and grants variances and exceptions to encourage rehabilitation of existing units over demolition. The Town developed new and more relaxed development standards for The Glens area of Woodside to reduce the need for exceptions and variances (Ordinance 2020- 604). In addition, in 2018, the Planning Commission determined that the conversion of a nonconforming main residence to another residential use does not require a Change of Use.

Policy H6.2d: Utilize Town and County rehabilitation programs: The Town maintains links to housing resources on the Town website, including the programs offered as part of the San Mateo County Home Repair Program.

IMPACTS

Impact 3.1-1 Development under the Proposed Project would not have a substantial adverse effect on a scenic vista. (Less than Significant)

The Woodside General Plan identifies and seeks to preserve visual resources including important vistas, such as views of the western hillsides as seen from the valley below, and those of the valley as seen from the hillsides (Goal LU1.4). Additionally, the General Plan identifies scenic highways and roads that provide vistas which enhance perception of the rural and natural character of the Town (Circulation Element). Designated scenic roads in the Planning Area include State scenic highways and Town scenic roads. State scenic highways are officially designated by the State, which include two significant segments: Skyline Boulevard (State Highway 35) and Junipero Serra Freeway (Interstate 280). Town scenic roads include Cañada Road, Kings Mountain Road, La Honda Road, Mountain Home Road, Sand Hill Road, Whiskey Hill Road, and Woodside Road (State Highway 84). State scenic highways and Town scenic roads are discussed under Impact 3.1-2. Scenic roads and highways, as well as scenic corridors and western hills, are displayed on Figure 3.1-1.

A significant impact would occur if development under the Proposed Project would have a substantial adverse effect on a scenic vista, such as entirely blocking or obstructing a scenic vista or substantially degrading the quality of the scenic vista. Implementation of the Proposed Project would allow single-family development within and adjacent to these scenic vistas and roads, including development along Cañada Road, Kings Mountain Road, La Honda Road, Mountain Home Road, Portola Road, Sand Hill Road, Whiskey Hill Road, Woodside Road (State Highway 84), State Highway 35, and Interstate 280. Implementation of the Proposed Project would also facilitate multi-family housing at Cañada College, as well as on the Raymundo Drive and 773 Cañada Road sites, visible from Interstate 280. If development pursuant to the Proposed Project were to be oriented or scaled in such a way that views of the scenic roads, western hillsides as seen from the valley below, and valley as seen from the hillsides are blocked in the Planning Area, a potentially significant impact could result.

The Woodside General Plan includes policies and strategies intended to preserve and enhance the vistas, highways, and roads of the Planning Area. Specifically, the Circulation Element calls for maintenance and improvement of the physical condition and safety of Town roadways, while preserving the Town's rural and scenic environment (Policy CL2.1). Strategies include design of

any new road or change in any existing road within the Planning Area be considered with great care to assure the scenic character, as well as scenic or conservation easements over properties adjacent to the roadway to preserve any vistas from the road and the natural, rural character of the Town. The Circulation Element also calls for the protection of scenic corridors, including State scenic highways Skyline Boulevard and Interstate 280, as well as local scenic roads mentioned above (Policy CL2.2).

With the exception of multi-family housing, development under the Proposed Project proposed in the scenic corridors along designated State scenic highways and Town scenic roads would be subject to architectural and site plan review to ensure appropriateness of design and materials, proper placement of structures, and landscape design in order to preserve and enhance scenic vistas. Municipal Code Section 153.912 outlines whether review from the Architectural and Site Review Board (ASRB) is a requirement for a development project. Within scenic corridors, ASRB review is required for proposed developments greater than 1,000 square feet and for all buildings located on ridge lines visible from the highways and scenic corridors. However, review of multi-family development under the Proposed Project would be done ministerially, subject to Objective Design Standards (ODS) to ensure new development is compatible with the rural character of Woodside in order to preserve and enhance scenic vistas. ADUs are not required to have ASRB review.

To implement these General Plan policies, the Municipal Code incorporates certain requirements. All proposed projects within scenic corridors, including development under the Proposed Project, will be reviewed for compliance with the Town's evaluation criteria of community character, site planning, building design, and landscape elements (Municipal Code Section 153.911 through 153.915). Projects will be assessed on their design and if the proposed project is developed in a manner which respects the character of scenic corridors and vistas, and if the project preserves the natural and scenic character of Woodside. Additionally, implementation of the Proposed Project would allow multi-family residential development in areas visible from Interstate 280, including within the Cañada College campus, at 773 Cañada Road, at Raymundo Drive, and at High Road. Development in these locations would be subject to design standards and requirements in the Municipal Code that regulate lot dimensions, building height, and setback requirements (Municipal Code Section 153.110(C)). Development standards and requirements would limit building heights, as well as require minimum front-yard, side-yard, and rear-yard setbacks. As such, building heights would be reduced below existing tree canopies and building footprints would be pushed back from the roadside of scenic corridors. These height and setback requirements would thus limit the potential for impacts along scenic vistas and scenic corridors.

Overall, with implementation of General Plan policies and existing Town regulations in place, substantial adverse effects on scenic vistas in the Planning Area would be minimized to the extent practicable and associated impacts would be less than significant.

Mitigation Measures

None required.

Impact 3.1-2 Development under 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. (Less than Significant)

A significant impact would occur if development under the Proposed Project would substantially damage scenic resources within a State scenic highway, such as by diminishing the aesthetic value of lands adjacent to highways. As discussed in Impact 3.1-1, implementation of the Proposed Project would allow development within and adjacent to State scenic highways, which include two significant segments: Skyline Boulevard (State Highway 35) and Junipero Serra Freeway (Interstate 280). Implementation of the Proposed Project would allow single-family development adjacent to Skyline Boulevard, as well as multi-family housing at Cañada College and at Town-owned site Raymundo Drive and the privately owned property at 773 Cañada Road, adjacent to Interstate 280. Such development could impact aesthetic value of lands within a State scenic highway (displayed on Figure 3.1-1).

However, any development located on State Scenic Highway pursuant to the Proposed Project would be required to comply with Caltrans Scenic Highway Guidelines, specifically Section VI Compliance Review, which is used to predict the degree and type of impact proposed transportation projects will have on the “visual” environment. For all locally-sponsored projects on the State scenic highways, Scenic Resource Evaluations (SRE) and/or Visual Impact Assessments (VIA) are submitted to Caltrans which summarizes the findings and recommended environmental commitments identified in the SRE and/or VIA in the environmental document and then provides a copy of the environmental document to the Landscape Architect for review and concurrence. Environmental commitments can involve avoiding, minimizing, compensating, and/or enhancing for the mitigation of proposed project impacts. The completed SRE and/or VIA serves as a supporting technical study and is referenced in the environmental document. Upon receipt of this information and other technical studies the environmental staff, in coordination with the Project Development Team, will determine the appropriate level of environmental documentation for the project.

In addition, all types of development pursuant to the Proposed Project would also be required to adhere to the Woodside General Plan which includes policies and strategies intended to preserve and enhance the highways within the Planning Area. The Circulation Element calls for the protection of scenic corridors, including State scenic highways Skyline Boulevard and Interstate 280 (Policy CL2.2).

For all single-family developments within scenic corridors of State scenic highway, including development under the Proposed Project, review for compliance with the Town’s evaluation criteria of community character, site planning, building design, and landscape elements (Municipal Code Section 153.911 and 153.915) would be required. Projects will be assessed on their design and if the proposed project is developed in a manner which respects the character of scenic corridors. As detailed under Impact 3.1-1, structures and site developments, including single-family development under the Proposed Project, would also be subject to the Architectural & Site Review Board (ASRB) to ensure appropriateness of design and materials, proper placement of structures, and landscape design in order to preserve and enhance land visible from roadways and other properties.

Review of multi-family developments under the Proposed Project would be ministerial, subject to Objective Design Standards (ODS) to ensure new development is compatible with the architectural context and rural character of Woodside as detailed under Impact 3.1-1. Additionally, implementation of the Proposed Project would allow multi-family residential development to occur within the Cañada College campus, at 773 Cañada Road, at Raymundo Drive, and at High Road, all visible from Interstate 280. Development would be subject to ODS as stated above and requirements in the Municipal Code that regulate lot dimensions, building height, and setback requirements (Municipal Code Section 153.110(C) to ensure impacts to scenic resources within State-designated scenic corridors are reduced. Development standards and requirements would limit building heights, as well as require minimum front-yard, side-yard, and rear-yard setbacks. As such, building heights would be reduced below existing tree canopies and building footprints would be pushed back from the roadside of scenic corridors. These height and setback requirements would thus limit the potential for impacts along scenic vistas and scenic corridors.

Compliance with existing General Plan policies and Municipal Code regulations would minimize the potential for significant impacts to scenic resources within State-designated highways. Associated impacts would be less than significant.

Mitigation Measures

None required.

Impact 3.1-3 Development under the Proposed Project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings in non-urbanized areas or conflict with applicable zoning and other regulations governing scenic quality in urbanized areas. (Less than Significant)

Pursuant to the CEQA¹, an “urbanized area” means a central city or group of contiguous cities with a population of 50,000 or more. The Town of Woodside had a population of 5,256 people in 2022;² therefore, the Town of Woodside is a “non-urbanized area.” As such, a significant impact would occur if development under the Proposed Project would substantially degrade the existing visual character or quality of public views of the site and its surrounding area.

Implementation of the Proposed Project anticipates construction of new single-family homes and ADUs on residentially zoned properties throughout Woodside. As the Planning Area is composed of existing single-family housing units and ADUs, implementation of the Proposed Project would be visually similar with the existing character as most of the inventory anticipates single-family development and ADUs.

The Proposed Project would also introduce multi-family residential development at Cañada College, 773 Cañada Road, and Town-owned sites on Raymundo Drive and High Road in areas where it does not exist today. To integrate this new development, the Proposed Project involves the adoption of Objective Design Standards (ODS) for each multi-family housing site to ensure new

¹ California Code Regs. Title 14, Ch. 3, § 15387 (“CEQA Guidelines”).

² United States Census Bureau, American Community Survey, Table DP05, 2022.

multi-family housing development is compatible with the architectural context and rural character of Woodside. Development under the Proposed Project would be required to comply with these applicable ODS, which are specific, quantifiable design criteria on setbacks and coverage, site access, building massing, and architectural design developed with input from the Planning Commission and community members. Compliance with ODS would ensure new multi-family housing development under the Proposed Project would not degrade the existing character or quality of public views of the Planning Area.

Further, the Woodside General Plan includes policies and strategies intended to preserve and enhance Woodside as a scenic, rural residential community (Goal LU-1). The Land Use Element calls for preservation and conservation of natural resources through the maintenance of community aesthetics through single-family residential guidelines and code compliance (Policy LU-1.3). Moreover, the 2012 Town of Woodside Design Guidelines provide guidance about ways to locate and design developments to maintain the character of the community and its natural setting and are used by Woodside's Planning Department, Architectural and Site Review Board (ASRB), and Planning Commission to evaluate the merits of proposed single-family residential development applications subject to discretionary review throughout Woodside. New development, including the development under the Proposed Project, would be subject to guidelines under the following sections: Community Character, Site Planning, Building Design, and Landscape Elements. Compliance with policies and guidelines would minimize any impact on the existing visual character or quality of views and surroundings in Woodside.

Therefore, the implementation of the Proposed Project would be required to comply with applicable zoning and other regulations governing visual character. Compliance with existing regulations and Proposed Project actions would help reduce impacts of new development and impacts would be less than significant.

Mitigation Measures

None required.

Impact 3.1-4 Development under 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. (Less than Significant)

A significant impact may occur if a project were to introduce new sources of light or glare on or from the project site which would be incompatible with the surrounding area. New development facilitated under the Proposed Project would introduce new sources of light within the Planning Area. Potential sources of new nighttime light from new development include light spillover from the windows of residences, perimeter lighting, as well as landscaping lighting. New development also could produce glare from sunlight reflecting off windows, reflective surfaces, and unshielded equipment. Motor vehicle windows, parked or passing by, or vehicle headlights at night form another potential source of light and glare.

Buildout of the Proposed Project would primarily involve single-family housing and ADUs within already developed areas and on existing single family residential lots. The Town's forested hillsides and tree-lined streets would limit light spillover to adjacent properties and illumination of the night sky. However, buildout of the Proposed Project would also involve the development of multi-family

residential development at Cañada College, 773 Cañada Road, and Town-owned sites on Raymundo Drive and High Road, which could involve taller buildings. Additional light and glare created under the Proposed Project from taller buildings on sites could illuminate currently dark or unlit areas without reflective or glaring surfaces. The Proposed Project involves the adoption of Objective Design Standards (ODS) to integrate high density housing onto these four multi-family housing sites. The ODS address lighting and state visible skylights shall have a flat profile, rather than domed, and be limited to 25 square feet per unit, which would minimize impacts from light and glare from these developments.

Further, all new development would be required to comply with Town of Woodside regulations, including Municipal Code Section 153.213 that governs Outdoor Lighting. Town Code stipulates all outdoor lighting fixtures shall not shine or glare on adjacent public or private roads or properties, and lighting patterns or illuminated areas shall be contained within the boundaries of the property on which the lighting is located. Further, the Town's Residential Design Guidelines includes a detailed section in the Landscape Elements about Lighting, which includes guidelines about site and landscape lighting, fixture style and design, and exterior fixtures. Compliance with California Building Code CBC standards would also minimize glare from sunlight reflecting off building windows. Development of multi-family residential development would be required to comply with Town of Woodside regulations about Outdoor Lighting. Compliance with these regulations would minimize impacts from light and glare.

As such, new sources would not increase the amount of nighttime lighting or glare in such a way that would be incompatible with the suburban nature of the town. Impacts associated with light and glare would be less than significant.

Mitigation Measures

None required.

3.2 Air Quality

This section describes the environmental and regulatory setting for air quality. It also describes impacts related to air quality that would result from implementation of the Proposed Project and mitigation for significant impacts where feasible and appropriate. This section has been prepared using methods and assumptions recommended in the air quality impact assessment guidelines of the Bay Area Air Quality Management District (BAAQMD). The section describes existing air quality in the region, the Proposed Project's contribution to localized concentrations of carbon monoxide (CO), impacts from vehicular emissions that have regional effects, and the exposure of sensitive receptors to Project-generated toxic air contaminants (TACs). Appendix D includes a detailed summary of the data used in this analysis.

Several commenters during the NOP and Scoping period expressed general concerns about air quality degradation within the Town should the Proposed Project be implemented.

Environmental Setting

PHYSICAL SETTING

The Planning Area is located in Woodside, within the San Francisco Bay Area Air Basin (SFBAAB). Ambient air quality is affected by climatological conditions, topography, and the types and amounts of pollutants emitted. The following sections summarize how air pollution moves through the air, water, and soil within the air basin, and how it is chemically changed in the presence of other chemicals and particles. This section also summarizes regional and local climate conditions, existing air quality conditions, and sensitive receptors that may be affected by project-generated emissions.

Although the primary factors that determine air quality are the locations of air pollutant sources and the amount of pollutants emitted from those sources, meteorological conditions and topography are also important factors. Atmospheric conditions, such as wind speed, wind direction, and air temperature gradients interact with the physical features of the landscape to determine the movement and dispersal of air pollutants. Unique geographic features throughout the state define fifteen air basins with distinctive regional climates. The air quality study area for the Planning Area is located in the San Mateo County basin subregion of the SFBAAB.¹

¹ Bay Area Air Quality Management District. May, 2017. California Environmental Quality Act Air Quality Guidelines. Available: https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en. Accessed: August 10, 2023.

San Mateo County is located in the peninsula region of the Bay Area which extends from the northwest of San Jose to the Golden Gate. The Santa Cruz Mountains run up the center of the peninsula, with elevations exceeding 2000 feet at the southern end, decreasing to 500 feet in South San Francisco. Coastal towns experience a high incidence of cool, foggy weather in the summer. Cities in the southeastern peninsula, such as Woodside, experience warmer temperatures and fewer foggy days because the marine layer is blocked by the ridgeline to the west.

Annual average wind speeds range from 5 to 10 mph throughout the peninsula, with higher wind speeds usually found along the coast. The prevailing winds along the peninsula's coast are from the west, although individual sites can show significant differences. On the east side of the mountains, winds are generally from the west, although wind patterns in this area are often influenced greatly by local topographic features.

Air pollution potential is highest along the southeastern portion of the peninsula where Woodside is located. This is the area most protected from the high winds and fog of the marine layer. Pollutant transport from upwind sites is common. In the southeastern portion of the peninsula, air pollutant emissions are relatively high due to motor vehicle traffic as well as stationary sources. Localized pollutants, such as carbon monoxide, can build up in "urban canyons." Winds are generally fast enough to carry the pollutants away before they can accumulate.

CRITERIA AIR POLLUTANTS

The federal and state governments have established ambient air quality standards (AAQA) for six criteria pollutants. Ozone is considered a regional pollutant because its precursors affect air quality on a regional scale. Pollutants such as CO, nitrogen dioxide (NO₂), sulfur dioxide (SO₂), and lead are considered local pollutants that tend to accumulate in the air locally. Particulate matter (PM) is both a regional and local pollutant. The primary criteria pollutants generated by the Proposed Project are ozone precursors (i.e., nitrogen oxides (NO_x) and reactive organic gases [ROGs]), CO, and PM.^{2,3,4}

All criteria pollutants can have human health effects at certain concentrations. The ambient air quality standards for these pollutants are set to protect public health and the environment with an adequate margin of safety (Clean Air Act [CAA] Section 109). Epidemiological, controlled human exposure, and toxicology studies evaluate potential health and environmental effects of criteria pollutants, and form the scientific basis for new and revised ambient air quality standards.

² As discussed above, there are also ambient air quality standards for SO₂, lead, sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particulates. However, these pollutants are typically associated with industrial sources, which are not included as part of the project. Accordingly, they are not evaluated further.

³ Most emissions of NO_x are in the form of nitric oxide (NO). Conversion to NO₂ occurs in the atmosphere as pollutants disperse downwind. Accordingly, NO₂ is not considered a local pollutant of concern for the project and is not evaluated further.

⁴ Reşitoğlu, Ibrahim A. 2018. *NO_x Pollutants from Diesel Vehicles and Trends in Control Technologies*. Published November 5. DOI: 10.5772/intechopen.81112. Available: <https://www.intechopen.com/books/diesel-and-gasoline-engines/no-sub-x-sub-pollutants-from-diesel-vehicles-and-trends-in-the-control-technologies>. Accessed: July 1, 2021.

Principal characteristics and possible health and environmental effects from exposure to the primary criteria pollutants generated by the project are discussed below.

Ozone

Ozone, or smog, is a photochemical oxidant that is formed when ROG and NO_x (both byproducts of the internal combustion engine) react with sunlight. ROG are compounds made up primarily of hydrogen and carbon atoms. Internal combustion associated with motor vehicle use is the major source of hydrocarbons. Other sources of ROG are emissions associated with the use of paints and solvents, the application of asphalt paving, and the use of household consumer products such as aerosols. The two major forms of NO_x are nitric oxide (NO) and NO₂. NO is a colorless, odorless gas that forms from atmospheric nitrogen and oxygen when combustion takes place under high temperature and/or high pressure. NO₂ is a reddish-brown irritating gas formed by the combination of NO and oxygen. In addition to serving as an integral participant in ozone formation, NO_x also directly acts as an acute respiratory irritant and increases susceptibility to respiratory pathogens.

Ozone poses a higher risk to those who already suffer from respiratory diseases (e.g., asthma), children, older adults, and people who are active outdoors. Exposure to ozone at certain concentrations can make breathing more difficult, cause shortness of breath and coughing, inflame and damage the airways, aggravate lung diseases, increase the frequency of asthma attacks, and cause chronic obstructive pulmonary disease. Studies show associations between short-term ozone exposure and non-accidental mortality, including deaths from respiratory issues. Studies also suggest long-term exposure to ozone may increase the risk of respiratory-related deaths.⁵ The concentration of ozone at which health effects are observed depends on an individual's sensitivity, level of exertion (i.e., breathing rate), and duration of exposure. Studies show large individual differences in the intensity of symptomatic responses, with one study finding no symptoms to the least responsive individual after a 2-hour exposure to 400 parts per billion (ppb) of ozone and a 50 percent decrease in forced airway volume in the most responsive individual. Although the results vary, evidence suggests that sensitive populations (e.g., asthmatics) may be affected on days when the 8-hour maximum ozone concentration reaches 80 ppb.⁶ The average background level of ozone in the Bay Area is approximately 45 ppb.⁷

In addition to human health effect, ozone has been tied to crop damage, typically in the form of stunted growth, leaf discoloration, cell damage, and premature death. Ozone can also act as a corrosive and oxidant, resulting in property damage such as the degradation of rubber products and other materials.

⁵ U.S. Environmental Protection Agency. 2021. *Ground-level Ozone Basics*. Last updated May 5. Available: <https://www.epa.gov/ground-level-ozone-pollution/ground-level-ozone-basics#wwh>. Accessed: July 1, 2021.

⁶ U.S. Environmental Protection Agency. 2016. *Health Effects of Ozone in the General Population*. Last updated September 2. Available: <https://www.epa.gov/ozone-pollution-and-your-patients-health/health-effects-ozone-general-population>. Accessed: July 1, 2021.

⁷ Bay Area Air Quality Management District. 2017. *Final 2017 Clean Air Plan*. Adopted April 19. Available: https://www.baaqmd.gov/~/media/files/planning-and-research/plans/2017-clean-air-plan/attachment-a_-proposed-final-cap-vol-1-pdf.pdf?la=en. Accessed: July 1, 2021.

Carbon Monoxide

Carbon monoxide is a colorless, odorless, toxic gas produced by incomplete combustion of carbon substances, such as gasoline or diesel fuel. In the study area, high CO levels are of greatest concern during the winter, when periods of light winds combine with the formation of ground-level temperature inversions from evening through early morning. These conditions trap pollutants near the ground, reducing the dispersion of vehicle emissions. Moreover, motor vehicles exhibit increased CO emission rates at low air temperatures. The primary adverse health effect associated with CO is interference with normal oxygen transfer to the blood, which may result in tissue oxygen deprivation. Exposure to CO at high concentrations can also cause fatigue, headaches, confusion, dizziness, and chest pain. There are no ecological or environmental effects of CO at or near existing background CO levels.⁸

Particulate Matter

PM consists of finely divided solids or liquids, such as soot, dust, aerosols, fumes, and mists. Two forms of fine particulates are now recognized: respirable coarse particles with an aerodynamic diameter of 10 micrometers or less (PM₁₀), and respirable fine particles with an aerodynamic diameter of 2.5 micrometers or less (PM_{2.5}). Particulate discharge into the atmosphere results primarily from industrial, agricultural, construction, and transportation activities. However, wind on arid landscapes also contributes substantially to local particulate loading. PM is considered both a local and a regional pollutant.

Particulate pollution can be transported over long distances and may adversely affect humans, especially people who are naturally sensitive or susceptible to breathing problems. Numerous studies have linked PM exposure to premature death in people with preexisting heart or lung disease. Other symptoms of exposure may include nonfatal heart attacks, irregular heartbeat, aggravated asthma, decreased lung function, and increased respiratory symptoms. Depending on composition, both PM₁₀ and PM_{2.5} can also affect water quality and acidity, deplete soil nutrients, damage sensitive forests and crops, affect ecosystem diversity, and contribute to acid rain.⁹

OTHER CRITERIA POLLUTANTS

The California Air Resources Board (CARB) has also established the California Ambient Air Quality Standards (CAAQS) for hydrogen sulfide (H₂S), sulfates, vinyl chloride, and visibility-reducing particles. These pollutants are not addressed by federal standards. Below is a summary of the pollutants and a description of their physical properties, health and other effects, sources, and the extent of the problems.

Hydrogen Sulfide

Hydrogen sulfide (H₂S) emissions often are associated with geothermal activity, oil and gas production, refining, sewage treatment plants, and confined animal feeding operations. H₂S in the

⁸ California Air Resources Board. 2021. *Carbon Monoxide & Health*. Available: <https://ww2.arb.ca.gov/resources/carbon-monoxide-and-health>. Accessed: July 1, 2021.

⁹ U.S. Environmental Protection Agency. 2021. *Health and Environmental Effects of Particulate Matter (PM)*. Last updated May 26. Available: <https://www.epa.gov/pm-pollution/health-and-environmental-effects-particulate-matter-pm>. Accessed: July 1, 2021.

atmosphere will likely oxidize into SO₂, which can lead to acid rain. At low concentrations, H₂S may cause irritation to the eyes, mucous membranes, and respiratory system, dizziness, and headaches. In high concentrations (800 parts per million can cause death), H₂S is extremely hazardous, especially in enclosed spaces. The Occupational Safety and Health Administration has the primary responsibility for regulating workplace exposure to H₂S.

Sulfates

Sulfates are another particulate product that results from the combustion of sulfur-containing fossil fuels; however, the majority of ambient sulfates is formed in the atmosphere. When SO₂ comes in contact with oxygen it precipitates out into sulfates. The health effects associated with SO₂ and sulfates more commonly known as sulfur oxides (SO_x) include respiratory illnesses, decreased pulmonary disease resistance, and aggravation of cardiovascular diseases. When acidic pollutants and particulates are also present, SO₂ tends to have an even more toxic effect.

Increased PM derived from SO₂ emissions also contributes to impaired visibility. In addition to particulates, sulfur trioxide and sulfate ion are precursors to acid rain. SO_x and NO_x are the leading precursors to acid rain, which can lead to corrosion of human-made structures and cause acidification of water bodies.

Visibility-Reducing Particles

Visibility-reducing particles consist of PM generated from a variety of natural and manmade sources and vary greatly in shape, size, and chemical composition. Some haze-causing particles (e.g., windblown dust and soot) are directly emitted into the air, whereas others are formed in the air from the chemical transformation of gaseous pollutants (e.g., sulfates, nitrates, organic carbon particles), which are the major constituents of fine PM. These fine particles, caused largely by the combustion of fuel, can travel hundreds of miles and cause visibility impairment. California has been labeled unclassified for visibility—CARB has not established a method for measuring visibility with the precision and accuracy needed to designate areas attainment or nonattainment.

Vinyl Chloride

Vinyl chloride is a colorless, sweet-smelling gas at ambient temperature. Landfills, publicly owned treatment works, and polyvinyl chloride production are the major identified sources of vinyl chloride emissions in California. Polyvinyl chloride can be fabricated into several products, such as pipes, pipe fittings, and plastics. In humans, epidemiological studies of occupationally exposed workers have linked vinyl chloride exposure to development of liver angiosarcoma, a rare cancer, and have suggested a relationship between exposure and lung and brain cancers.

TOXIC AIR CONTAMINANTS

Although ambient air quality standards have been established for criteria pollutants, no ambient standards exist for TACs. Many pollutants are identified as TACs because of their potential to increase the risk of developing cancer or because of their acute or chronic health risks. For TACs that are known or suspected carcinogens, CARB has consistently found that there are no levels or thresholds below which exposure is risk-free. Individual TACs vary greatly in the risks they present. At a given level of exposure, one TAC may pose a hazard that is many times greater than another.

TACs are identified and their toxicity is studied by the California Office of Environmental Health Hazard Assessment (OEHHA) The primary TACs of concern associated with the Proposed Project are asbestos and diesel particulate matter (DPM).

Asbestos is the name given to several naturally occurring fibrous silicate minerals. Before the adverse health effects of asbestos were identified, asbestos was widely used as insulation and fireproofing in buildings, and it can still be found in some older buildings. It is also found in its natural state in rock or soil. The inhalation of asbestos fibers into the lungs can result in a variety of adverse health effects, including inflammation of the lungs, respiratory ailments (e.g., asbestosis, which is scarring of lung tissue that results in constricted breathing), and cancer (e.g., lung cancer and mesothelioma, which is cancer of the linings of the lungs and abdomen).

DPM is generated by diesel-fueled equipment and vehicles. Within the Bay Area, the BAAQMD has found that of all controlled TACs, emissions of DPM are responsible for about 82 percent of the total ambient cancer risk.¹⁰ Short-term exposure to DPM can cause acute irritation (e.g., eye, throat, and bronchial), neurophysiological symptoms (e.g., lightheadedness and nausea), and respiratory symptoms (e.g., cough and phlegm). The U.S. Environmental Protection Agency (EPA) has determined that diesel exhaust is “likely to be carcinogenic to humans by inhalation.”¹¹

ODORS

The BAAQMD’s thresholds for odors are qualitative and based on BAAQMD’s Regulation 7, Odorous Substances. This rule places general limitations on odorous substances and specific emission limitations on certain odorous compounds. Odors are also regulated under BAAQMD Regulation 1, Rule 1-301, Public Nuisance, which states that no person shall discharge from any source whatsoever quantities of air contaminants or other materials that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or the public; endanger the comfort, repose, health, or safety of any such persons or the public; or cause, or have a natural tendency to cause, injury or damage to businesses or property. Under BAAQMD’s Rule 1-301, a facility that receives three or more violation notices within a 30-day period can be declared a public nuisance. The BAAQMD has established odor screening thresholds for land uses that have the potential to generate substantial odor complaints, including wastewater treatment plants, landfills or transfer stations, composting facilities, confined animal facilities, food manufacturing, and chemical plants.¹²

¹⁰ Bay Area Air Quality Management District. 2017. *Final 2017 Clean Air Plan*. Adopted April 19. Available: https://www.baaqmd.gov/~/media/files/planning-and-research/plans/2017-clean-air-plan/attachment-a_-proposed-final-cap-vol-1-pdf.pdf?la=en. Accessed: July 1, 2021.

¹¹ U.S. Environmental Protection Agency. 2003. *Diesel Engine Exhaust*; CASRN N.A. February 28. Available: https://cfpub.epa.gov/ncea/iris/iris_documents/documents/subst/0642_summary.pdf#nameddest=woe. Accessed: July 1, 2021.

¹² Bay Area Air Quality Management District. 2017. *California Environmental Quality Act, Air Quality Guidelines*. May. Available: https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en. Accessed: July 1, 2021.

EXISTING AIR QUALITY CONDITIONS

Ambient Criteria Pollutant Concentrations

A number of ambient air quality monitoring stations are located in SFBAAB to monitor progress toward air quality standards attainment of the National Ambient Air Quality Standards (NAAQS) and CAAQS. The NAAQS and CAAQS are discussed further under *Regulatory Setting*. There are no monitoring stations in Woodside. The nearest monitoring station to the Planning Area is the Redwood City Station, located approximately five miles northeast of the Planning Area. Table 3.2-1 summarizes data for criteria air pollutant levels from the Redwood City Station from 2019-2021. This does not include PM₁₀, which the Redwood City Station does not monitor. Table 3.2-1 shows the monitoring station was in violation of federal and state ozone standards in 2019 and 2020 and the federal PM_{2.5} standard in 2020. Federal and state standards for other pollutants were not exceeded. These existing ozone and PM_{2.5} violations of ambient air quality standards indicate that certain individuals exposed to this pollutant may experience certain health effects, including increased incidence of cardiovascular and respiratory ailments.

Table 3.2-1: Ambient Air Quality Data at the Redwood City Monitoring Station (2019-2021)

Pollutant Standards	2019	2020	2021
Ozone (O₃)			
Maximum 1-hour concentration (ppm)	0.083	0.098	0.085
Maximum 8-hour concentration (ppm)	0.077	0.077	0.063
Number of days standard exceeded^a			
CAAQS 1-hour (> 0.09 ppm)	0	1	0
CAAQS 8-hour (> 0.070 ppm)	2	1	0
NAAQS 8-hour (> 0.070 ppm)	2	1	0
Carbon Monoxide (CO)			
Maximum 1-hour concentration (ppm)	2	1.8	1.6
Maximum 8-hour concentration (ppm)	1.1	1.5	0.9
Number of days standard exceeded^a			
NAAQS 1-hour (≥ 35.0 ppm)	0	0	0
CAAQS 1-hour (≥ 20.0 ppm)	0	0	0
NAAQS 8-hour (≥ 9.0 ppm)	0	0	0
CAAQS 8-hour (≥ 9.0 ppm)	0	0	0
Nitrogen Dioxide (NO₂)			
State maximum 1-hour concentration (ppm)	0.054	0.045	0.040
State second-highest 1-hour concentration (ppm)	0.051	0.044	0.039
Annual average concentration (ppm)	0.009	0.008	0.007
Number of days standard exceeded^a			
CAAQS 1-hour (0.180 ppm)	0	0	0
Fine Particulate Matter (PM_{2.5})			
National ^e maximum 24-hour concentration (µg/m ³)	29.5	124.1	30.1
National ^e second-highest 24-hour concentration (µg/m ³)	24.7	116.0	20.1

Pollutant Standards	2019	2020	2021
State ^f maximum 24-hour concentration ($\mu\text{g}/\text{m}^3$)	29.5	124.1	30.1
State ^f second-highest 24-hour concentration ($\mu\text{g}/\text{m}^3$)	24.7	116.0	20.1
National annual average concentration ($\mu\text{g}/\text{m}^3$)	7.0	9.8	6.0
State annual average concentration ($\mu\text{g}/\text{m}^3$)	–	9.8	6.1
Measured number of days standard exceeded^a			
NAAQS 24-hour ($> 35 \mu\text{g}/\text{m}^3$)	0	9	0

Notes:

- ^a An exceedance is not necessarily related to a violation of the standard.
- ^b National statistics are based on standard conditions data. In addition, national statistics are based on samplers using federal reference or equivalent methods.
- ^c State statistics are based on approved local samplers and local conditions data.
- ^d State criteria for ensuring that data are sufficiently complete for calculating valid annual averages are more stringent than the national criteria.
- ^e National statistics are based on samplers using federal reference or equivalent methods.
- ^f State statistics are based on local approved samplers.

ppm = parts per million; NAAQS = National Ambient Air Quality Standards; CAAQS = California Ambient Air Quality Standards; $\mu\text{g}/\text{m}^3$ = micrograms per cubic meter, mg/m^3 = milligrams per cubic meter, – = no data available

Sources: California Air Resources Board, 2023. iADAM: Air Quality Data Statistics – Top 4 Summary (2019-2021), San Mateo County, Redwood City Monitoring Station. Available: <https://www.arb.ca.gov/adam/topfour/topfour1.php>. Accessed: August 10, 2023.
U.S. Environmental Protection Agency. 2021. Outdoor Air Quality Data. Monitor Values Reports (Carbon Monoxide, 2019-2021, San Mateo County, Redwood City Monitoring Station. Last updated September 2022. Available: <https://www.epa.gov/outdoor-air-quality-data/monitor-values-report>. Accessed: August 10, 2023.

Existing TAC Sources and Health Risks

The BAAQMD maintains an inventory of health risks associated with all permitted stationary sources within the SFBAAB. The inventory was last updated in 2023 and is publicly available online. According to BAAQMD’s inventory¹³, there are no existing stationary emission sources within the Planning Area. Aside from stationary sources, emissions of TACs in and around the Planning Area are also generated from mobile sources. The BAAQMD considers roadways with greater than 10,000 average daily traffic (ADT) as “high volume roadways” and recommends they be included in the analysis of health risks. According to the Town’s General Plan 2012, existing roadways located in the Planning Area that have ADT greater than 10,000 vehicles include I-280, Woodside Road, Farm Hill Road, and Alameda de las Pulgas.

Regional Attainment Status

Local monitoring data are used to designate areas as nonattainment, maintenance, attainment, or unclassified for the ambient air quality standards. The four designations are defined below.

¹³ Bay Area Air Quality Management District. 2023. Stationary Source Screening Map. March 18. Available: <https://baaqmd.maps.arcgis.com/apps/webappviewer/index.html?id=845658c19eae4594b9f4b805fb9d89a3>. Accessed: August 7, 2023.

- Nonattainment—assigned to areas where monitored pollutant concentrations consistently violate the standard in question.
- Maintenance—assigned to areas where monitored pollutant concentrations exceeded the standard in question in the past but are no longer in violation of that standard.
- Attainment—assigned to areas where pollutant concentrations meet the standard in question over a designated period of time.
- Unclassified—assigned to areas where data are insufficient to determine whether a pollutant is violating the standard in question.

Table 3.2-2 summarizes the attainment status of the Bay Area.

Table 3.2-2: Federal and State Ambient Air Quality Attainment Status for the SFBAAB

Criteria Pollutant	State Designation	Federal Designation
Ozone (8-hour)	Nonattainment	Nonattainment
Ozone (1-hour)	Nonattainment	–
Carbon Monoxide (CO)	Attainment	Attainment
Particulate Matter (PM ₁₀)	Nonattainment	Unclassified
Fine Particulate Matter (PM _{2.5})	Nonattainment	Unclassified/Attainment
Nitrogen Dioxide (NO ₂)	Attainment	Attainment
Sulfur Dioxide (SO ₂)	Attainment	–
Lead	–	Attainment
Sulfates	Attainment	(No Federal Standard)
Hydrogen Sulfide	Unclassified	(No Federal Standard)
Visibility Reducing Particles	Unclassified	(No Federal Standard)

– = no classification listed

Source: Bay Area Air Quality Management District. 2023. *Air Quality Standards and Attainment Status*. Available: <https://www.baaqmd.gov/about-air-quality/research-and-data/air-quality-standards-and-attainment-status#twelve>. Accessed: August 10, 2023.

LOCATIONS OF SENSITIVE RECEPTORS

Sensitive land uses are defined as locations where human populations, especially children, seniors, and sick persons are located and where there is reasonable expectation of continuous human exposure according to the averaging period for the air quality standards (i.e., 24-hour or 8-hour). Per the BAAQMD, typical sensitive land uses are residences, hospitals, and schools. Parks and playgrounds, where sensitive receptors (e.g., children and seniors) are present are considered sensitive land uses.¹⁴

¹⁴ Bay Area Air Quality Management District. 2017b. *California Environmental Quality Act. Air Quality Guidelines*. May. Available: https://www.baaqmd.gov/~/_media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en. Accessed: July 1, 2021.

The Planning Area is comprised of the Town of Woodside, encompassing 11.8 square miles. Institutional, public, and quasi-public land uses in Town include Woodside Elementary School, a fire station, Woodside Library, a church, local government buildings, and a museum. Other notable land uses along Woodside Road include a grocery store, the Post Office, and various restaurants. Much of the rest of the community is primarily single-family residential and open space uses, with some limited local-serving commercial uses. Overall, residential uses account for 5,611.3 acres, commercial uses occupy 17.6 acres, and open space uses occupy 1,001.4 acres. Sensitive receptors are currently located at the aforementioned land uses (e.g., residential, schools, parks, etc.) throughout the Planning Area.

REGULATORY SETTING

Federal Regulations

Air quality in the project area is regulated through the efforts of various federal, state, regional, and local government agencies. These agencies work jointly, as well as individually, to improve air quality through legislation, planning, policy-making, education, and a variety of programs. The agencies responsible for improving the air quality within the air basin are discussed below.

National Ambient Air Quality Standards

The EPA has been charged with implementing national air quality programs. EPA's air quality mandates draw primarily from the federal CAA, which was enacted in 1963. The most recent major amendments were made by Congress in 1990. The CAA required EPA to establish NAAQS for six common air pollutants found all over the U.S. referred to as criteria air pollutants. EPA has established primary and secondary NAAQS for the following criteria air pollutants: ozone, CO, NO₂, SO₂, PM₁₀, PM_{2.5}, and lead. The NAAQS are shown in Table 3.2-3. The primary standards protect public health and the secondary standards protect public welfare. The CAA also required each state to prepare a State Implementation Plan (SIP) for attaining and maintaining the NAAQS. The federal Clean Air Act Amendments of 1990 (CAAA) added requirements for states with nonattainment areas to revise their SIPs to incorporate additional control measures to reduce air pollution. California's SIP is modified periodically to reflect the latest emissions inventories, planning documents, and rules and regulations of the air basins as reported by their jurisdictional agencies. EPA is responsible for reviewing all SIPs to determine whether they conform to the mandates of the CAA and its amendments, and whether implementation will achieve air quality goals. If EPA determines a SIP to be inadequate, EPA may prepare a federal implementation plan that imposes additional control measures. If an approvable SIP is not submitted or implemented within the mandated time frame, sanctions may be applied to transportation funding and stationary air pollution sources in the air basin.

Table 3.2-3: National and California Ambient Air Quality Standards

Criteria Pollutant	Average Time	California Standards	National Standards ^a	
			Primary	Secondary
Ozone	1-hour	0.09 ppm	None ^b	None ^b
	8-hour	0.070 ppm	0.070 ppm	0.070 ppm
Particulate Matter (PM ₁₀)	24-hour	50 µg/m ³	150 µg/m ³	150 µg/m ³
	Annual mean	20 µg/m ³	None	None
Fine Particulate Matter (PM _{2.5})	24-hour	None	35 µg/m ³	35 µg/m ³
	Annual mean	12 µg/m ³	12.0 µg/m ³	15 µg/m ³
Carbon Monoxide (CO)	8-hour	9.0 ppm	9 ppm	None
	1-hour	20 ppm	35 ppm	None
Nitrogen Dioxide (NO ₂)	Annual mean	0.030 ppm	0.053 ppm	0.053 ppm
	1-hour	0.18 ppm	0.100 ppm	None
Sulfur Dioxide ^c (SO ₂)	Annual mean	None	0.030 ppm	None
	24-hour	0.04 ppm	0.014 ppm	None
	3-hour	None	None	0.5 ppm
	1-hour	0.25 ppm	0.075 ppm	None
Lead	30-day Average	1.5 µg/m ³	None	None
	Calendar quarter	None	1.5 µg/m ³	1.5 µg/m ³
	3-month average	None	0.15 µg/m ³	0.15 µg/m ³
Sulfates	24-hour	25 µg/m ³	None	None
Visibility-reducing Particles	8-hour	– ^d	None	None
Hydrogen Sulfide (H ₂ S)	1-hour	0.03 ppm	None	None
Vinyl Chloride	24-hour	0.01 ppm	None	None

^a National standards are divided into primary and secondary standards. Primary standards are intended to protect public health, whereas secondary standards are intended to protect public welfare and the environment.

^b The federal 1-hour standard of 12 parts per hundred million was in effect from 1979 through June 15, 2005. The revoked standard is referenced because it was employed for such a long period and is a benchmark for SIPs.

^c The annual and 24-hour NAAQS for SO₂ only apply for 1 year after designation of the new 1-hour standard to those areas that were previously in nonattainment for 24-hour and annual NAAQS.

^d CAAQS for visibility-reducing particles is defined by an extinction coefficient of 0.23 per kilometer—visibility of 10 miles or more due to particles when relative humidity is less than 70 percent.

CAAQS = California Ambient Air Quality Standards; NAAQS = National Ambient Air Quality Standards; ppm = parts per million; µg/m³ = micrograms per cubic meter

Source: California Air Resources Board. 2016. *Ambient Air Quality Standards*. May Available: <https://ww2.arb.ca.gov/sites/default/files/2020-07/aaqs2.pdf>. Accessed: August 10, 2023.

Corporate Average Fuel Economy Standards for Light-Duty Passenger Vehicles

The National Highway Traffic Safety Administration (NHTSA) Corporate Average Fuel Economy (CAFE) standards require substantial improvements in fuel economy and reductions in emissions of criteria air pollutants and precursors, as well as greenhouse gases, from all light-duty vehicles sold in the United States. On August 2, 2018, NHTSA and the EPA proposed an amendment to the fuel

efficiency standards for passenger cars and light trucks and established new standards for model years 2021 through 2026 that would maintain the then-current 2020 standards through 2026—this was known as the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule. On September 19, 2019, NHTSA and the EPA issued a final action on the One National Program Rule, which is considered Part One of the SAFE Vehicles Rule and a precursor to the proposed fuel efficiency standards. The One National Program Rule enables NHTSA and the EPA to provide nationwide uniform fuel economy and air pollutant standards by 1) clarifying that federal law preempts state and local tailpipe standards, 2) affirming NHTSA’s statutory authority to set nationally applicable fuel economy standards, and 3) withdrawing California’s CAA preemption waiver to set state-specific standards.

NHTSA and the EPA published their decision to withdraw California’s waiver and finalize the regulatory text related to the preemption on September 27, 2019 (84 *Federal Register* 51310). California, 22 other states, the District of Columbia, and two cities filed suit against Part One of the SAFE Vehicles Rule on September 20, 2019 (*California et al. v. United States Department of Transportation et al.*, 1:19-cv-02826, U.S. District Court for the District of Columbia). On October 28, 2019, the Union of Concerned Scientists, Environmental Defense Fund, and other groups filed a protective petition for review after the federal government sought to transfer the suit to the District of Columbia (*Union of Concerned Scientists v. National Highway Traffic Safety Administration*). The lawsuit filed by California and others has been stayed, pending resolution of the petition.

NHTSA and the EPA published final rules on April 30, 2020, to amend and establish national air pollutant and fuel economy standards (Part Two of the SAFE Vehicles Rule) (85 *Federal Register* 24174). The revised rule changes the national fuel economy standards for light-duty vehicles from 46.7 miles per gallon (mpg) to 40.4 mpg in future years. California, 22 other states, and the District of Columbia filed a petition for review of the final rule on May 27, 2020.¹⁵

On January 20, 2021, the president issued an executive order, directing NHTSA and the EPA to review the SAFE Vehicles Rule, Part One, and propose a new rule for suspending, revising, or rescinding it by April 2021. The executive order also requires NHTSA and the EPA to propose a new rule for suspending, revising, or rescinding Part Two by July 2021. On April 22, 2021, NHTSA announced it proposes to repeal the SAFE Vehicles Rule, Part One, allowing California the right to set its own standards.¹⁶

Emission Standards for On-road Heavy-duty Vehicles

EPA has established a series of increasingly strict emission standards for new heavy-duty bus and truck engines. Emissions from heavy-duty trucks are managed by regulations and emission limits implemented at the federal, state, and local levels. In December 2000, EPA signed the Heavy-Duty Highway Rule, which reduces emissions from on-road, heavy-duty diesel trucks by establishing a series of increasingly strict emission standards for new engines. Manufacturers were required to produce new diesel vehicles that meet PM and NO_x emission standards beginning with model year 2007, with the phase-in period being between 2007 and 2010. The phase-in was based on a percentage-

¹⁵ *California et al. v. United States Department of Transportation et al.*, 1:19-cv-02826, U.S. District Court for the District of Columbia.

¹⁶ U.S. Department of Transportation, National Highway Transportation Safety Administration. 2021. *Corporate Average Fuel Economy Preemption*. Available: https://www.nhtsa.gov/sites/nhtsa.gov/files/documents/cape_preemption_nprm_04222021_1.pdf. Accessed: July 1, 2021.

of-sales basis: 50 percent from 2007 to 2009 and 100 percent in 2010. Requirements apply to engines installed in all vehicles with a gross vehicle weight rating (GVWR) above 14,000 pounds and to some engines installed in vehicles with a GVWR between 8,500 and 14,000 pounds.¹⁷

Emission Standards for Non-road Diesel Engines

To reduce emissions from non-road diesel equipment, EPA established a series of increasingly strict emission standards for new non-road diesel engines, also referred to as off-road diesel engines. Tier 1 standards were phased in on newly manufactured equipment from model years 1996 through 2000, depending on the engine horsepower category. Tier 2 standards were phased in on newly manufactured equipment from model years 2001 through 2006. Tier 3 standards were phased in on newly manufactured equipment from model years 2006 through 2008. Tier 4 standards, which require advanced emission-control technology, were phased in from model years 2008 through 2015.

Hazardous Air Pollutants and Toxic Air Contaminants

TACs, or in federal parlance, hazardous air pollutants (HAPs), are a defined set of airborne pollutants that may pose a present or potential hazard to human health. A TAC is defined as an air pollutant that may cause or contribute to an increase in mortality or in serious illness, or that may pose a hazard to human health. TACs are usually present in minute quantities in the ambient air; however, their high toxicity or health risk may pose a threat to public health even at low concentrations.

A wide range of sources, from industrial plants to motor vehicles, emit TACs. The health effects associated with TACs are quite diverse and generally are assessed locally, rather than regionally. TACs can cause long-term health effects such as cancer, birth defects, neurological damage, asthma, bronchitis, or genetic damage; or short-term acute effects such as eye watering, respiratory irritation (a cough), running nose, throat pain, and headaches.

For evaluation purposes, TACs are separated into carcinogens and non-carcinogens based on the nature of the physiological effects associated with exposure to the pollutant. Carcinogens are assumed to have no safe threshold below which health impacts would not occur. This contrasts with criteria air pollutants for which acceptable levels of exposure can be determined and for which the ambient standards have been established (Table 3.2-3). Cancer risk from TACs is expressed as excess cancer cases per one million exposed individuals, typically over a lifetime of exposure.

EPA and CARB regulate HAPs and TACs, respectively, through statutes and regulations that generally require the use of the maximum available control technology or best available control technology for air toxics to limit emissions.

¹⁷ U.S. Environmental Protection Agency. 2019. *Regulations for Smog, Soot, and Other Air Pollution from Commercial Trucks & Buses*. Last Updated February 21. Available: <https://www.epa.gov/regulations-emissions-vehicles-and-engines/regulations-smog-soot-and-other-air-pollution-commercial>. Accessed July 1, 2021.

State Regulations

California Clean Air Act and California Ambient Air Quality Standards

In 1988, the state legislature adopted the California CAA, which established a statewide air pollution control program. The California CAA requires all air districts in the state to endeavor to meet the CAAQS by the earliest practical date. Unlike the federal CAA, the California CAA does not set precise attainment deadlines. Instead, the California CAA establishes increasingly stringent requirements for areas that require more time to achieve the standards. The CAAQS are generally more stringent than the NAAQS and incorporate additional standards for sulfates, hydrogen sulfide, visibility-reducing particles, and vinyl chloride. The CAAQS and NAAQS are listed together in Table 3.2-3.

CARB and regional air districts bear responsibility for achieving California's air quality standards. The standards are to be achieved through district-level air quality management plans, which are incorporated into the SIP. In California, EPA has delegated authority to prepare SIPs to CARB, which, in turn, has delegated that authority to individual air districts, such as the BAAQMD. CARB has traditionally established state air quality standards, maintained oversight authority for air quality planning, developed programs for reducing emissions from motor vehicles, developed air emissions inventories, collected air quality and meteorological data, and approved SIPs.

The California CAA substantially increases the authority and responsibilities of air districts. The California CAA designates air districts as lead air quality planning agencies, requires air districts to prepare air quality plans, and grants air districts the authority to implement transportation control measures. The California CAA also emphasizes control over "indirect and area-wide sources" of air pollutant emissions. The California CAA gives local air pollution control districts explicit authority to regulate indirect sources and establish traffic control measures.

Statewide Truck and Bus Regulation

CARB adopted the Truck and Bus Regulation in 2008 to focus its efforts on reducing emissions of DPM, NO_x, and other criteria pollutants from diesel-fueled vehicles. This regulation applies to any diesel-fueled vehicle as well as any dual-fuel or alternative-fuel diesel vehicle that travels on public highways; yard trucks with on-road engines; yard trucks with off-road engines used for agricultural operations; school buses; and vehicles with a GVWR of more than 14,000 pounds. The purpose of the regulation is to require trucks and buses registered in the state to have 2010 or newer engines by 2023. Compliance schedules have been established for lighter vehicles (GVWR of 14,000–26,000 pounds) and heavier vehicles (GVWR of more than 26,001 pounds).¹⁸ As of January 1, 2020, only vehicles that met the requirements of the Trucks and Bus Regulation were allowed to register with the California Department of Motor Vehicles.

¹⁸ California Air Resources Board. 2020. *CARB Truck Rule Compliance Required for DMV Registration*. July. Available: https://ww3.arb.ca.gov/msprog/truckstop/pdfs/sb1_faqeng.pdf. Accessed: July 1, 2021.

Air Toxic Control Measure

In 2004, CARB developed multiple measures under its air toxic control measures (ATCMs) to address specific mobile- and stationary-source issues that adversely affect public health. The ATCMs focused on reducing the public's exposure to DPM and TAC emissions. The "Limit Diesel-Fueled Commercial Motor Vehicle Idling" ATCM required drivers of heavy-duty trucks with a GVWR of more than 10,000 pounds to not idle the primary engine for more than 5 minutes at any given time or operate an auxiliary power system for more than 5 minutes within 100 feet of a restricted area.¹⁹ In addition, CARB set operating requirements for new emergency standby engines (i.e., diesel-fueled compression-ignition engines of less than 50 brake horsepower). Specifically, new engines shall not operate more than 50 hours per year for maintenance and testing purposes. This does not limit engine operation for emergency use or the emissions testing required to show compliance with ATCM Section 93115.6(a)(3).

Toxic Air Contaminant Regulation

California regulates TACs primarily through the Tanner Act (AB 1807) and the Hot Spots Act (AB 2588). The Tanner Act (AB 1807) created California's program to reduce exposure to air toxics. CARB defines TACs as air pollutants that may cause or contribute to an increase in mortality or an increase in serious illness or that may pose a present or potential hazard to human health. CARB has formally identified over 200 substances and groups of substances as TACs.²⁰ Direct exposure to these pollutants has been shown to cause cancer, birth defects, damage to the brain and nervous system, and respiratory disorders. The Hot Spots Act (AB 2588) supplements the AB 1807 program by requiring a statewide air toxics inventory, notification of people exposed to a significant health risk, and facility plans to reduce these risks. The California OEHHA is required to develop guidelines for health risk assessments under the Air Toxics Hot Spots Program. These guidelines provide the scientific basis for the values used to assess the risk of emissions exposure from facilities and new sources.²¹

Off-Road Diesel Vehicle Regulation

Off-road vehicles include, but are not limited to, diesel compression-ignition equipment; spark-ignition gasoline and liquefied petroleum gas equipment; support equipment at ports, airports, and railways; and marine vehicles. In 2007, CARB aimed to reduce emissions of DPM, NO_x, and other criteria pollutants from off-road diesel-fueled equipment with adoption of the In-Use Off-Road Diesel-Fueled Fleets Regulation (Off-Road Regulation). The Off-Road Regulation applies to all diesel-fueled equipment or alternative-fuel diesel equipment with a compression-ignition engine greater than 25 horsepower (e.g., tractors, bulldozers, backhoes) as well as dual-fuel equipment.

¹⁹ California Air Resources Board. 2005. *Final Regulation Order, Regulation for In-Use Off-Road Diesel Vehicles*. Available: <https://ww3.arb.ca.gov/regact/2007/ordiesl07/frooal.pdf>. Accessed: July 1, 2021.

²⁰ California Air Resources Board. 2021. *CARB-Identified Toxic Air Contaminants*. Available: <https://ww2.arb.ca.gov/resources/documents/carb-identified-toxic-air-contaminants>. Accessed: July 1, 2021.

²¹ Office of Environmental Health Hazard Assessment. 2015. *Air Toxics Hot Spots Program Guidance Manual for the Preparation of Health Risk Assessments*. Air, Community, and Environmental Research Branch, Office of Environmental Health Hazard Assessment, California Environmental Protection Agency. February. Available: <https://oehha.ca.gov/media/downloads/crnrr/2015guidancemanual.pdf>. Accessed: July 1, 2021.

The regulation also applies to all equipment that is rented or leased.²² The purpose of the regulation is to reduce emissions by retiring, repowering, or replacing older, dirtier engines with newer, cleaner engines. The regulation established a compliance schedule for owners of small, medium, and large fleets. The schedule for large and medium fleets requires full implementation by 2023; small fleets have until 2028.²³

Local Regulations

Bay Area Air Quality Management District (BAAQMD)

At the local level, responsibilities of air quality districts include overseeing stationary-source emissions, approving permits, maintaining emissions inventories, maintaining air quality stations, overseeing agricultural burning permits, and reviewing air quality-related sections of environmental documents required by the California Environmental Quality Act (CEQA). The air quality districts are also responsible for establishing and enforcing local air quality rules and regulations that address the requirements of federal and state air quality laws and for ensuring that NAAQS and CAAQS are met.

The project falls under the jurisdiction of the BAAQMD. The BAAQMD has local air quality jurisdiction over projects in the SFBAAB including San Mateo County. The BAAQMD developed advisory emission thresholds to assist CEQA lead agencies in determining the level of significance of a project's emissions, which are outlined in its *California Environmental Quality Act, Air Quality Guidelines* (CEQA Guidelines).²⁴ The BAAQMD has also adopted air quality plans to improve air quality, protect public health, and protect the climate, including the 2017 Clean Air Plan: Spare the Air, Cool the Climate (2017 Clean Air Plan).²⁵

The 2017 Clean Air Plan was adopted by the BAAQMD on April 19, 2017. The 2017 Clean Air Plan updates the prior 2010 Bay Area ozone plan and outlines feasible measures to reduce ozone; provides a control strategy to reduce particulate matter, air toxics, and greenhouse gases (GHGs) in a single, integrated plan; and establishes emission control measures to be adopted or implemented. The 2017 Clean Air Plan contains the following primary goals; consistency with these goals is evaluated in this section.

- **Protect Air Quality and Health at the Regional and Local Scale:** Attain all state and national air quality standards, and eliminate disparities among Bay Area communities in cancer health risk from TACs.
- **Protect the Climate:** Reduce Bay Area GHG emissions to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050; the 2017 Clean Air Plan is the most

²² California Air Resources Board. 2008. *Final Regulation Order, Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling*. Available: <https://ww3.arb.ca.gov/regact/idling/fro1.pdf>. Accessed: July 1, 2021.

²³ Ibid.

²⁴ Bay Area Air Quality Management District. 2017. *California Environmental Quality Act, Air Quality Guidelines*. May. Available: https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en. Accessed: July 1, 2021.

²⁵ Bay Area Air Quality Management District. 2017. *Final 2017 Clean Air Plan*. Adopted April 19. Available: https://www.baaqmd.gov/~media/files/planning-and-research/plans/2017-clean-air-plan/attachment-a_-proposed-final-cap-vol-1-pdf.pdf?la=en. Accessed: July 1, 2021.

current applicable air quality plan for the air basin and consistency with this plan is the basis for determining whether the project would conflict with or obstruct implementation of an air quality plan.

In addition to air quality plans, the BAAQMD also adopts rules and regulations to improve existing and future air quality. The Proposed Project may be subject to the following district rules.

- **Regulation 2, Rule 2 (New Source Review)**—This regulation contains requirements for Best Available Control Technology and emission offsets.
- **Regulation 2, Rule 5 (New Source Review of Toxic Air Contaminants)**—This regulation outlines guidance for evaluating TAC emissions and their potential health risks.
- **Regulation 6, Rule 1 (Particulate Matter)**—This regulation restricts emissions of particulate matter (PM) darker than No. 1 on the Ringlemann Chart to less than 3 minutes in any 1 hour.
- **Regulation 7 (Odorous Substances)**—This regulation establishes general odor limitations on odorous substances and specific emission limitations on certain odorous compounds.
- **Regulation 8, Rule 3 (Architectural Coatings)**—This regulation limits the quantity of reactive organic gases (ROG) in architectural coatings.
- **Regulation 9, Rule 6 (Nitrogen Oxides Emission from Natural Gas-Fired Boilers and Water Heaters)**—This regulation limits emissions of nitrogen oxides (NO_x) generated by natural gas-fired boilers.
- **Regulation 9, Rule 8 (Stationary Internal Combustion Engines)**—This regulation limits emissions of NO_x and carbon monoxide (CO) from stationary internal combustion engines of more than 50 horsepower.

Woodside General Plan 2012

The Town of Woodside General Plan 2012 (General Plan) includes the following goals and policies associated with air quality:

Goal CV-1: Maintain a healthy natural environment.

Policy CV-1.5: Particular attention should be given to air quality in environmental, entitlement, and permitting reviews for land development and grading to ensure compliance with the requirements of the Bay Area Air Quality Management District.

Town of Woodside Climate Action Plan (CAP)

The Town of Woodside Climate Action Plan (CAP) was adopted in 2015 and establishes GHG reduction targets to meet the State and community's goals. The purpose of the Plan is to describe the principal sources of the Town of Woodside's greenhouse gas (GHG) emissions, and to outline the goals and measures the Town has identified for achieving the community's target of reducing emissions to 15 percent below 2005 levels by 2020. The Town identified 20 local measures to be implemented during the planning period (2015-2020) to reduce GHG emissions. The Town met the emission reduction target of 15 percent through the Total Statewide Initiative Emissions Reductions and implementation of the Town's local measures, for total estimated reductions of nearly 24 percent from 2020 business as usual emission levels.

Impact Analysis

SIGNIFICANCE CRITERIA

For the purposes of this EIR, a significant impact would occur if the Proposed Project would:

- Criterion 1: Conflict with or obstruct implementation of the applicable air quality plan.**
- Criterion 2: Result in a cumulatively considerable net increase in any criteria pollutant for which the project region is classified as a nonattainment area under an applicable federal or state ambient air quality standard.**
- Criterion 3: Expose sensitive receptors to substantial pollutant concentrations.**
- Criterion 4: Result in other emissions (such as those leading to odors) that would adversely affect a substantial number of people.**

As discussed above, all pollutants that would be generated by the Proposed Project are associated with some form of health risk (e.g., asthma, lower respiratory problems). Regional pollutants can be transported over long distances and affect ambient air quality far from the emissions source. Localized pollutants affect ambient air quality near the emissions source. As discussed above, the primary pollutants of concern generated by the Proposed Project are ozone precursors (ROG and NO_x), CO, PM, and TAC (including DPM and asbestos). Emission thresholds that can be used to evaluate the significance level of regional and localized pollutants are discussed in the following subsections. Thresholds and guidance for evaluating potential odors associated with the Proposed Project area also presented.

Regional Emissions

This analysis evaluates the impacts of regional emissions generated by the Proposed Project using a two-tiered approach that considers both project- and plan-level guidance recommended by the BAAQMD in its CEQA Guidelines.²⁶

First, this analysis considers whether the Project would conflict with the most recent air quality plan (2017 Clean Air Plan), consistent with the BAAQMD guidance for programmatic analyses.^{27,28} The impact analysis evaluates whether the Project supports the primary goals of the 2017 Clean Air Plan, including applicable control measures from the 2017 Clean Air Plan, and whether it would disrupt or hinder implementation of any 2017 Clean Air Plan control measure.

²⁶ Bay Area Air Quality Management District. 2017. *California Environmental Quality Act, Air Quality Guidelines*. May. Available: https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en. Accessed: July 1, 2021.

²⁷ Bay Area Air Quality Management District. 2017b. *California Environmental Quality Act, Air Quality Guidelines*. May. Available: https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en. Accessed: July 1, 2021.

²⁸ Bay Area Air Quality Management District. 2017. *Final 2017 Clean Air Plan*. Adopted: April 19. Available: https://www.baaqmd.gov/~media/files/planning-and-research/plans/2017-clean-air-plan/attachment-a_-proposed-final-cap-vol-1-pdf.pdf?la=en. Accessed: July 1, 2021.

Second, calculated regional criteria pollutant emissions for Proposed Project operations are compared to the BAAQMD’s project-level thresholds. The BAAQMD’s thresholds are summarized in Table 3.2-4 and are recommended by the air district to evaluate the significance of a project’s regional criteria pollutant emissions.²⁹ Construction-related emissions have not been quantified and are not evaluated with respect to the thresholds. According to the BAAQMD, projects with emissions in excess of the thresholds shown in Table 3.2-4 would be expected to have a significant cumulative impact on regional air quality because an exceedance of the thresholds is anticipated to contribute to CAAQS and NAAQS violations.

Table 3.2-4: BAAQMD Project-Level Regional Criteria Pollutant Emission Thresholds

Analysis Scenario	BAAQMD Thresholds
Regional Criteria Pollutants (Construction)	ROG: 54 lb/day NO _x : 54 lb/day PM ₁₀ : 82 lb/day (exhaust only) PM _{2.5} : 54 lb/day (exhaust only)
Regional Criteria Pollutants (Operations)	ROG: 54 lb/day NO _x : 54 lb/day PM ₁₀ : 82 lb/day (includes fugitive and exhaust emissions) PM _{2.5} : 54 lb/day (includes fugitive and exhaust emissions)

lb = pounds

ROG = reactive organic gases

NO_x = nitrogen oxides

PM₁₀ = coarse particulate matter that is 10 microns in diameter and smaller

PM_{2.5} = fine particulate matter that is 2.5 microns in diameter and smaller

Sources: Bay Area Air Quality Management District. 2017. *California Environmental Quality Act, Air Quality Guidelines*. May. Available: https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en. Accessed: August 1, 2023.

The BAAQMD’s project-level thresholds were developed to analyze emissions generated by a single project, and thus, do not lend well to an evaluation of emissions from a land use plan being evaluated at a programmatic level. Large-scale land use plans that consist of numerous individual projects will, by their nature, produce more criteria pollutants than single projects, even if the plans include efficiency measures to reduce future emissions. Use of the project-level thresholds to evaluate land use plans may therefore unfairly penalize the plans, yielding a significant and unavoidable conclusion simply due to scale. However, because a comparison to the project-level thresholds is informative to the analysis of the Proposed Project’s impacts to air quality, this analysis accounts for both sets of thresholds.

²⁹ Bay Area Air Quality Management District. 2017. *California Environmental Quality Act, Air Quality Guidelines*. May. Available: https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en. Accessed: July 1, 2021.

Health-Based Thresholds for Project-Generated Pollutants of Human Health Concern

The California Supreme Court's 2018 decision in *Sierra Club v. County of Fresno* (6 Cal. 5th 502), hereafter referred to as the Friant Ranch Decision, reviewed the long-term regional air quality analysis contained in the environmental impact report (EIR) for the proposed Community Plan Update and Friant Ranch Specific Plan (Friant Ranch Project). The Friant Ranch Project proposed a 942-acre master-plan development in unincorporated Fresno County, within the San Joaquin Valley Air Basin, which is currently designated as a nonattainment area with respect to the NAAQS and CAAQS for O₃ and PM_{2.5}. The court found that the EIR's air quality analysis was inadequate because it failed to provide enough detail "for the public to translate the bare [criteria pollutant emissions] numbers provided into adverse health impacts or to understand why such a translation is not possible at this time." The court's decision notes that environmental documents must attempt to connect a project's air quality impacts to specific health effects or explain why it is not technically feasible to perform such an analysis.

All criteria pollutants generated by the Proposed Project would be associated with some form of health risk (e.g., asthma, lower respiratory problems). Criteria pollutants can be classified as either regional pollutants or localized pollutants. Regional pollutants can be transported over long distances and affect ambient air quality far from the emissions source. Localized pollutants affect ambient air quality near the emissions source. O₃ is considered a regional criteria pollutant, whereas CO, NO₂, SO₂, and lead are localized pollutants. Particulate matter can be both a local and a regional pollutant, depending on its composition. The primary criteria pollutants of concern generated by the Proposed Project would be O₃ precursors (ROG and NO_x), CO, and particulate matter, including DPM.

The sections that follow discuss thresholds and analysis considerations for regional and local project-generated criteria pollutants with respect to their human health implications.

Regional Project-Generated Criteria Pollutants (Ozone Precursors and Regional Particulate Matter)

Adverse health effects from regional criteria pollutant emissions, such as O₃ precursors and particulate matter, generated by the Proposed Project are highly dependent on a multitude of interconnected variables (e.g., cumulative concentrations, local meteorology and atmospheric conditions, the number and character of exposed individuals [e.g., age, gender]). Therefore, O₃ precursors (ROG and NO_x) contribute to the formation of ground-borne O₃ on a regional scale. Emissions of ROG and NO_x generated in an area may not correlate to a specific O₃ concentration in that same area. Similarly, some types of particulate pollutants may be transported over long distances or formed through atmospheric reactions. As such, the magnitude and locations of specific health effects from exposure to increased O₃ or regional particulate matter concentrations are the product of emissions generated by numerous sources throughout a region, as opposed to a single individual project. Moreover, exposure to regional air pollution does not guarantee that an individual will experience an adverse health effect. As discussed above, there are large individual differences in the intensity of symptomatic responses to air pollutants. These differences are influenced, in part, by the underlying health condition of an individual, which cannot be known.

Models and tools have been developed to correlate regional criteria pollutant emissions to potential community health impacts. Appendix D summarizes many of these tools, identifies the analyzed

pollutants, describes their intended application and resolution, and analyzes whether they could be used to reasonably correlate project-level emissions to specific health consequences. Although models are capable of quantifying O₃ and any secondary particulate matter formation and associated health effects, these tools were developed to support regional planning and policy analysis and have limited sensitivity to small changes in criteria pollutant concentrations induced by individual projects. Therefore, translating project-generated criteria pollutants to the locations where specific health effects could occur or the resultant number of additional days of nonattainment is not possible with any degree of accuracy.

The technical limitations of existing models (e.g., for correlating project-level regional emissions to specific health consequences) are recognized by air quality management districts throughout the state, including the San Joaquin Valley Air Pollution Control District (SJVAPCD) and South Coast Air Quality Management District (SCAQMD), which provided amici curiae briefs for the Friant Ranch Project's legal proceedings. In its brief, the SJVAPCD acknowledged that HRAs for localized air toxics, such as DPM, are common; however, "it is not feasible to conduct a similar analysis for criteria air pollutants because currently available computer modeling tools are not equipped for this task."³⁰ The SJVAPCD further notes that emissions solely from the Friant Ranch Project, which equate to less than one-tenth of one percent of total NO_x and volatile organic compounds in the valley, is not likely to yield valid information and that any such information would not be "accurate when applied at the local level." SCAQMD presents similar information in its brief, stating that "it takes a large amount of additional precursor emissions to cause a modeled increase in ambient O₃ levels."³¹⁻³²

As discussed above, air districts develop region-specific CEQA thresholds of significance in consideration of existing air quality concentrations as well as attainment or nonattainment designations under the NAAQS and CAAQS. The NAAQS and CAAQS are informed by a wide range of scientific evidence that demonstrates that there are known safe concentrations of criteria pollutants. Although recognizing that air quality is a cumulative problem, air districts typically consider projects that generate criteria pollutant and O₃ precursor emissions that are below the thresholds to be minor in nature. Such projects would not adversely affect air quality or exceed the NAAQS or CAAQS. Emissions generated by the Proposed Project could increase photochemical reactions and the formation of tropospheric O₃ and secondary particulate matter, which, at certain concentrations, could lead to increased incidences of specific health consequences. Although these health effects are associated with O₃ and particulate pollution, the effects are a result of cumulative and regional emissions. Therefore, the Proposed Project's incremental contribution cannot be traced to specific health outcomes on a regional scale, and a quantitative correlation of project-generated regional criteria pollutant emissions to specific human health impacts is not included in this analysis. It is foreseeable that unmitigated construction-related and operational emissions of O₃ precursors and particulate matter, in excess of the BAAQMD thresholds, could contribute to

³⁰ San Joaquin Valley Air Pollution Control District. 2015. *Amicus Curiae Brief of San Joaquin Valley Unified Air Pollution Control District in Support of Defendant and Respondent, County of Fresno and Real Party in Interest and Respondent, Friant Ranch, L.P.* Available: <https://www.courts.ca.gov/documents/7-s219783-ac-san-joaquin-valley-unified-air-pollution-control-dist-041315.pdf>. Accessed: July 1, 2021.

³¹ South Coast Air Quality Management District. 2015. *Application of the South Coast Air Quality Management District for Leave to File Brief of Amicus Curiae in Support of Neither Party and [Proposed] Brief of Amicus Curiae.* Available: <https://www.courts.ca.gov/documents/9-s219783-ac-south-coast-air-quality-mgt-dist-041315.pdf>. Accessed: July 1, 2021.

³² For example, SCAQMD's analysis of its 2012 Air Quality Attainment Plan showed that the modeled NO_x and ROG reductions of 432 and 187 tons per day, respectively, reduced ozone levels by only 9 parts per billion.

cumulative and regional health impacts. In such cases, all feasible mitigation would be applied, and emissions would be reduced to the extent possible.

Localized Project-Generated Criteria Pollutant Emissions (CO and Particulate Matter) and Air Toxics (DPM and Asbestos)

Localized pollutants generated by a project can affect populations near the emissions source. Because these pollutants dissipate with distance, emissions from individual projects can result in direct and material health impacts on adjacent sensitive receptors. The localized pollutants of concern that would be generated by the Proposed Project are CO, particulate matter, DPM, and asbestos. The applicable thresholds for each pollutant are described below.

Carbon Monoxide

Heavy traffic congestion can contribute to high levels of CO, and individuals exposed to such hot spots may have a greater likelihood of developing adverse health effects. The BAAQMD has adopted screening criteria that provides a conservative indication of whether project-generated traffic would cause a potential CO hot spot. If the screening criteria are not met, a quantitative analysis through site-specific dispersion modeling of project-related CO concentrations would not be necessary, and the project would not cause localized violations of the CAAQS for CO. The BAAQMD's CO screening criteria are summarized below.

- The project traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour.
- The project traffic would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway).
- The project is consistent with an applicable congestion management program established by the county congestion management agency for designated roads or highways, regional transportation plan, and local congestion management agency plans.

Particulate Matter

The BAAQMD adopted an incremental PM_{2.5} concentration-based significance threshold in which a "substantial" contribution at the project level for an individual source is defined as total (i.e., exhaust and fugitive) PM_{2.5} concentrations exceeding 0.3 µg/m³. This is the same threshold used to evaluate the placement of new receptors that would be exposed to individual PM_{2.5} emissions sources. In addition, the BAAQMD considers projects to have a cumulatively considerate PM_{2.5} impact if sensitive receptors are exposed to PM_{2.5} concentrations from local sources within 1,000 feet, including existing sources, project-related sources, and reasonably foreseeable future sources, that exceed 0.8 µg/m³. The BAAQMD has not established PM₁₀ concentration-based thresholds of significance. BAAQMD's PM_{2.5} thresholds apply to both new receptors and new sources. However, the BAAQMD considers mass emissions of fugitive PM₁₀ from earth moving activities to be less than significant with applicable of the BAAQMD's Basic Construction Mitigation Measures.

Diesel Particular Matter

DPM has been identified as a TAC and is particularly concerning because long-term exposure can lead to cancer, birth defects, and damage to the brain and nervous systems. The BAAQMD has adopted incremental cancer and hazard thresholds to evaluate receptor exposure to single sources of DPM emissions. The “substantial” DPM threshold defined by the BAAQMD is exposure of a sensitive receptor to an individual emissions source, resulting in an excess cancer risk level of more than 10 in 1 million or a non-cancer (i.e., chronic or acute) hazard index (HI) greater than 1.0. The air district considers projects to have a cumulatively considerable DPM impact if they contribute to DPM emissions, that when combined with cumulative sources within 1,000 feet of sensitive receptors, result in excess cancer risk levels of more than 100 in 1 million or an HI greater than 10.0. The BAAQMD considers projects to have a significant cumulative impact if it introduces new receptors at a location where the combined exposure of all cumulative sources within 1,000 feet is in excess of cumulative thresholds.

Asbestos

The BAAQMD considers a project to have a significant impact if it does not comply with the applicable regulatory requirements outlined in Regulation 11, Rule 2.

Odors

The BAAQMD and CARB have identified several types of land uses as being commonly associated with odors, such as landfills, wastewater treatment facilities, and animal processing centers.^{33,34} The BAAQMD’s CEQA Guidelines recommend that plan-level analyses identify the location of existing and planned odor sources and include policies to reduce potential odors impacts in the plan area.

METHODOLOGY AND ASSUMPTIONS

Air quality impacts associated with construction and operation of the Proposed Project were assessed and quantified (where applicable) using standard and accepted software tools, methodologies, and emission factors. A summary of the methodology is provided below.

Construction

As discussed in Chapter 2, *Project Description*, of this draft EIR, the Proposed Project would facilitate development of up to 423 new housing units.³⁵ The residential land uses that could be developed under the Proposed Project would generate construction-related emissions from mobile and stationary construction equipment exhaust, employee and haul truck vehicle exhaust and fugitive dust, fugitive dust from land clearing and material movement, and off-gassing emissions from paving and application of architectural coatings. The specific size, location, construction

³³ Bay Area Air Quality Management District. 2017. *California Environmental Quality Act, Air Quality Guidelines*. May. Available: [https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en](https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en). Accessed: July 1, 2021.

³⁴ California Air Resources Board. 2005. *Air Quality and Land Use Handbook: A Community Health Perspective*. April. Available: <https://ww3.arb.ca.gov/ch/handbook.pdf>. Accessed: July 1, 2021.

³⁵ The air quality modeling analysis was conducted based on the development anticipated at that time. Although the net amount of development has since changed, the air quality analysis represented in this section is conservative, because it assumes a greater amount of net development than may actually occur.

techniques and scheduling that would be utilized for each future individual development project occurring within the Planning Area from implementation of the Proposed Project is not currently known. With an anticipated buildout year of 2031, development of the housing units associated with the Proposed Project would occur over an extended period of time and would depend on factors such as local economic conditions, market demand, and other financing considerations. As such, without specific project-level details it is not possible to develop a refined construction inventory.³⁶ Consequently, the determination of construction air quality impacts for each individual development project, or a combination of these projects, would require the Town to speculate regarding such potential future project-level environmental impacts. Thus, in the absence of the necessary construction information required to provide an informative and meaningful analysis, the evaluation of potential construction-related impacts resulting from implementation of the Proposed Project is conducted qualitatively in this EIR.

Operations

Long-term (i.e., operational) regional emissions of criteria air pollutants and precursors, including mobile-, energy-, and area-source emissions, were quantified for the Proposed Project. As stated in Chapter 2, *Project Description*, buildout of the eight-year planning horizon of the Proposed Project includes existing development, pipeline development, and new development. The land uses categorized as “existing development” would remain unchanged through 2031, land uses categorized as “pipeline development” included projects that are being reviewed or have been approved by the Town, but not yet constructed, and “new development” includes the future development within the Planning Area. Since existing development would remain unchanged, the air quality analysis focuses on the net change in development which would include the land uses associated with the pipeline and new development categories.

Operational Mobile Source Emissions

Criteria pollutant emissions from motor vehicles were estimated using emission factors from CARB’s most recent version of its Emissions Factor model, version 2021 (EMFAC2021) and daily vehicle trips and daily vehicle miles traveled (VMT) from as described in the Section 3.7, *Transportation* and Appendix G of this EIR. Criteria pollutants emissions from vehicles were calculated by multiplying the VMT estimates by the appropriate emission factors provided by EMFAC2021. These emissions were added to process emissions (i.e., emission from vehicle starts, running losses, etc.), which were calculated by multiplying the daily trips by the appropriate emission factors provided by EMFAC2021. Please refer to Appendix D for detailed summary of data utilized in this analysis.

Operational Area, Energy, and Stationary Source Emissions

Area and energy emissions were estimated using the most recent version of the California Emission Estimator Model (CalEEMod), version 2022.1. Area sources include emissions from natural gas combustion in fireplaces, use of landscape maintenance equipment, repainting of buildings, and

³⁶ Project-level information includes details such as the size and scale of the project to be constructed, construction schedule, equipment fleet, construction worker crew estimates, and demolition, and grading quantities.

consumer products (cleaners, detergents, degreasers, etc.).³⁷ Energy sources include the combustion of natural gas for building heating and hot water. The Proposed Project's emissions were estimated using a buildout year of 2031. Because operational details for each individual development project proposed under the Proposed Project are currently unknown, CalEEMod defaults were assumed based on the anticipated land uses. Stationary sources such as emergency generators and boilers that would be developed for each individual development project, or a combination of these projects, would be subject to the permitting requirements by the BAAQMD. Stationary sources are discussed qualitatively, because details of future projects and their stationary sources are currently unknown.

RELEVANT PROPOSED GOALS AND POLICIES

- Policy H2.1** Provide Opportunities for Varied Housing Types with Access to High Resource Areas Amenities (schools, libraries, retail, restaurants, and services), and Transit Routes, including Bus Stops, Designated Bicycle Lanes, and Safe Routes to School Pathways.
- Policy H3.1** Support New Student, Faculty, and/or Staff Housing at Cañada College.
- Policy H3.2** Rezone Properties Allowing Increased Housing Density.
- Policy H6.3** Promote Sustainability Including Energy Efficient Housing.

IMPACTS

Impact 3.2-1 Implementation of the Proposed Project would not conflict with or obstruct the implementation of the applicable air quality plan. (Less than Significant)

The CAA requires that a SIP or an air quality control plan be prepared for areas with air quality violating the NAAQS. The SIP sets forth the strategies and pollution control measures that states will use to attain the NAAQS. The CAA requires attainment plans to demonstrate a five percent per year reduction in nonattainment air pollutants or their precursors, averaged every consecutive 3-year period, unless an approved alternative measure of progress is developed. Air quality attainment plans (AQAP) outline emissions limits and control measures to achieve and maintain these standards by the earliest practical date. The current AQAP for the SFBAAB is the 2017 Clean Air Plan.³⁸

³⁷ Per BAAQMD, wood-burning devices of any kind are not allowed to be installed in new homes or buildings being constructed in the Bay Area. Only emissions from natural gas fireplaces were included in the analysis. Bay Area Air Quality Management District. 2020. Wood Smoke Pollution. Last updated March 11. Available: <https://www.baaqmd.gov/rules-and-compliance/wood-smoke>. Accessed: July 1, 2021.

³⁸ Bay Area Air Quality Management District. 2017. *Final 2017 Clean Air Plan*. Adopted April 19. Available: [https://www.baaqmd.gov/~media/files/planning-and-research/plans/2017-clean-air-plan/attachment-a_-proposed-final-cap-vol-1-pdf.pdf?la=en](https://www.baaqmd.gov/~/media/files/planning-and-research/plans/2017-clean-air-plan/attachment-a_-proposed-final-cap-vol-1-pdf.pdf?la=en). Accessed: July 1, 2021.

According to the BAAQMD’s CEQA Guidelines, to meet the Threshold of Significance for operational-related criteria air pollutant and precursor impacts for plans (other than regional plans), a proposed plan must satisfy the following criteria.³⁹

- Consistency with current air quality plan (AQP) control measures (this requirement applies to project-level as well as plan-level analyses).
- A proposed plan’s projected VMT or vehicle trips (VT) (either measure may be used) increase is less than or equal to its projected population increase.

Each of these criteria is addressed below for the Proposed Project.

Consistency with the 2017 Clean Air Plan

The primary goals of the 2017 Clean Air Plan (CAP) are to (1) reduce emissions and decrease concentrations of harmful pollutants, (2) safeguard public health by reducing exposure to air pollutants that pose the greatest health risk, and (3) reduce GHG emissions and protect the climate. The Proposed Project incorporates policies and programs that will support regional attainment of the CAAQS and NAAQS. For example, the Proposed Project has identified parcels for high density multi-family housing at Cañada College (Policy H3.1). By facilitating development of 75 units at Cañada College, the Proposed Project would result in housing for college workforce in proximity to campus, reducing vehicle commutes and related emissions.

The remainder of sites identified for development under the Proposed Project would primarily involve facilitation of three multifamily developments of 16-17 units each and smaller scale infill development in established residential neighborhoods. Smaller-scale development includes vacant and underutilized single-family residences and development of accessory dwelling units (ADUs). As such, the Proposed Project would foster infill development within the Town limit and would not conflict with the goals of the 2017 CAP.

The 2017 CAP also contains 85 control strategies designed to reduce ozone precursors, protect public health, and serve as a regional climate protection strategy. The BAAQMD’s implementation of the control strategies employs a wide range of tools and resources, and many of the control strategies are not intended or designed to be achieved by local government. Table 3.2-5 identifies the 2017 CAP control measures that are relevant to the Proposed Project and summarizes how the Project would be either consistent or inconsistent with these measures.

Table 3.2-5: BAAQMD 2017 Clean Air Plan Control Measure Consistency

<i>Applicable 2017 Clean Air Plan Control Measures</i>	<i>Proposed Project Consistency</i>
Transportation Control Measures	
TR2: Trip Reduction Programs:	Non-applicable. Employer-based trip reduction programs do not represent a feasible mitigation option.

³⁹ Bay Area Air Quality Management District. 2022. California Environmental Quality Act. Air Quality Guidelines. Available: <https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines>. Accessed: August 16, 2023.

Table 3.2-5: BAAQMD 2017 Clean Air Plan Control Measure Consistency

<i>Applicable 2017 Clean Air Plan Control Measures</i>	<i>Proposed Project Consistency</i>
Implement the regional Commuter Benefits Program that requires employers with 50 or more Bay Area employees to provide commuter benefits.	This is because the majority of employed Woodside residents commute to jobs in other communities and employers are located predominantly outside Woodside. As such, the Town does not have the legal authority to require employer-based trip reduction programs. See Impact 3.7-2 in Section 3.7, Transportation, for a detailed discussion of why employer trip reduction programs are not feasible for the Proposed Project.
TR10: Land Use Strategies: Support implementation of Plan Bay Area, maintain and disseminate information on current climate action plans and other local best practices, and collaborate with regional partners to identify innovative funding mechanisms to help local governments address air quality and climate change in their general plans.	Consistent. As outlined under Policy 3.1, the Proposed Project has identified parcels for high density multi-family housing at Cañada College, Town-owned sites Raymundo Drive and High Road, and 773 Cañada Road, which would incorporate land use changes that serve to reduce VMT. Inconsistent. Other than the housing proposed at Cañada College, Town-owned sites Raymundo Drive and High Road, and 773 Cañada Road, the Proposed Project identifies sites for development that largely consist of single-family housing in areas that necessitate vehicular travel, as such increasing VMT.
Building Control Measures	
BL1: Green Buildings: Identify barriers to effective local implementation of the CalGreen (Title 24) statewide building energy code; develop solutions to improve implementation/enforcement. Engage with additional partners to target reducing emissions from specific types of buildings.	Consistent. New development facilitated by the Proposed Project would be subject to Policy H6.3, which promotes sustainability, including energy efficient housing. In addition, development would comply with the Town's Green Building Requirements (Town Code Section 150.13), which adopts the mandatory statewide sustainable building practices identified in the CalGreen Code.
BL2: Decarbonize Buildings: Explore incentives for property owners to replace their furnace, water heater or natural-gas powered appliances with zero-carbon alternatives.	Consistent. Program H6.3 of the Proposed Project would require compliance with the Solar Mandate which requires installation of photovoltaic panels on all new residences (houses, condominiums, and apartment projects) up to three stories to offset their use of electricity.
Waste Management Control Measures	
WA4: Recycling and Waste Reduction: Develop or identify and promote model ordinances on community-wide zero waste goals and recycling	Consistent. New development facilitated by the Proposed Project would meet the requirements of the Town Code. Section 50.33 specifies that the percentage of incoming waste from construction, demolition, and alteration activities that is diverted

Table 3.2-5: BAAQMD 2017 Clean Air Plan Control Measure Consistency

<i>Applicable 2017 Clean Air Plan Control Measures</i>	<i>Proposed Project Consistency</i>
of construction and demolition materials in commercial and public construction projects.	from landfill disposal meets a required minimum of 60 percent.
Water Control Measures	
WR2: Support Water Conservation: Develop a list of best practices that reduce water consumption and increase on-site water recycling in new and existing buildings; incorporate into local planning guidance.	Consistent. New development facilitated by the Proposed Project would be required to comply with the requirements of the CalGreen Code, which sets forth maximum flow rates for water fixtures, including showerheads, bathroom and kitchen faucets, and toilets.

Given the existing rural development pattern and relatively low population density in the Planning Area as well as the distance of Woodside from major employment and commercial centers, the residents of new housing resulting from the Proposed Plan will inevitably need to travel by single-occupant vehicle to meet their daily needs. However, overall the Proposed Plan would promote infill development within the Town limit and facilitate development of student and/or workforce housing at Canada College, reducing the need for students, faculty and staff to commute by car. Further, as illustrated above, implementation of Proposed Plan policies and programs and compliance with existing regulations would promote "green building" practices, reduce solid waste production, and support water conservation, consistent with the objectives of the 2017 CAP. Therefore, the Proposed Project would have a less than significant impact with respect to conflicts with the 2017 Clean Air Plan.

Projected VMT and Population Increase

Section 3.13, *Transportation*, provides a summary of the VMT forecasts for baseline conditions and for future townwide VMT, accounting for buildout of the Proposed Project. The VMT forecasts indicate that, at buildout, the Proposed Project would result in a Home-Based VMT per capita that is 10.4 percent below the baseline 2019 Town VMT per capita, which is less than the projected population increase. As such, operational impacts from implementation of the Proposed Project would be less than significant.

Based on the above analysis, the Proposed Project would not conflict with implementation of the 2017 Clean Air Plan. Accordingly, the Proposed Project would have a less-than-significant air quality impact.

Mitigation Measures

None required.

Impact 3.2-2 Implementation of the Proposed Project would result in a cumulatively considerable net increase of criteria pollutants for which the Project region is nonattainment under an applicable federal or State ambient air quality standard. (Less than Significant with Mitigation Incorporated)

Construction

Construction associated with new land use developments under the Proposed Project would result in the temporary generation of ozone precursors (ROG, NO_x), CO, and particulate matter emissions that could result in short-term impacts on ambient air quality within the Planning Area. Emissions would originate from mobile and stationary construction equipment exhaust, employee and haul truck vehicle exhaust, fugitive dust emissions from land clearing, soil movement, and demolition, and off-gassing emissions from architectural coatings and asphalt paving. Construction-related emissions would vary substantially depending on the level of activity, length of the construction period, specific construction operations, types of equipment, number of personnel, wind and precipitation conditions, and soil moisture content.

The Proposed Project does not propose any specific development. Construction of land use developments allowable under the Proposed Project would occur incrementally over the course of the eight-year buildout period. As the timing and intensity of future development projects is not known at this time, the precise effects of construction activities associated with buildout of the Proposed Project cannot be accurately quantified at this time. Project-specific details of future development within the Planning Area are currently unknown, development would be driven by market conditions, site constraints, land availability, and property owner interest. It is assumed that implementation of the Proposed Project ultimately could result in the development of up to 423 housing units. As such, it is anticipated that in any given year, multiple land use development projects would be constructed within the Planning Area.

As noted previously, the BAAQMD's project-level thresholds were developed to analyze emissions generated by a single project. Although the construction emission impacts associated with each new individual development would be short-term in nature and limited to the period of time when construction activity is taking place for that particular development, the concurrent construction of a multitude of individual development projects that could occur at any one time in the Planning Area under the Proposed Project would generate combined criteria pollutant emissions on a daily basis that would exceed the BAAQMD's project-level thresholds. In addition, depending on the size and scale of an individual development project, along with its construction schedule and other parameters, there may also be instances where the daily construction emissions generated by a single development project within the Planning Area could also exceed the BAAQMD's criteria pollutant thresholds. These emissions could contribute to ozone formation and other air pollution in the SFBAAB, which at certain concentrations, can contribute to short- and long-term human health effects.

To reduce construction-related emissions of future development projects within the Planning Area, future development would be required to comply with the Town's General Plan. Policy CV1.5 requires special attention be given to air quality in environmental, entitlement, and permitting reviews for land development and grading to ensure compliance with the requirements of the Bay

Area Air Quality Management District. The extent to which these measures would reduce emissions is unknown. As such, construction emissions generated in the Planning Area by implementation of the Proposed Project would result in a potentially significant impact on air quality and mitigation would be required.

However, BAAQMD has developed preliminary construction screening criteria which provides lead agencies with a conservative indication of whether implementing the proposed project could potentially result in the generation of construction-related criteria air pollutants or precursors that exceed the thresholds of significance. If all the following screening criteria are met, the construction of the proposed project would result in a less-than-significant impact related to criteria air pollutants and precursors:

- The project size is at or below the applicable screening level size of 254 dwelling units for single-family housing or 416 dwelling units for multi-family housing.
- All best management practices are included in the project design and implemented during construction.
- Construction-related activities would not overlap with operational activities.
- Construction-related activities would not include:
 - demolition,
 - simultaneous occurrence of two or more construction phases (e.g., paving and building construction would occur simultaneously),
 - extensive site preparation (e.g., grading, cut and fill, or earth movement),
 - extensive material transport (e.g., soil import and export requiring a considerable amount of haul truck activity), or
 - stationary sources (e.g., backup generators) subject to Air District rules and regulations.

As such, the majority of residential development pursuant to the Proposed Project would result in a less-than-significant impact related to criteria air pollutants and precursors. No proposed sites for development would exceed the screening level size standards and compliance with Mitigation Measure AQ-1 would ensure that all best management practices are included in the project design and implemented during construction. However, there is a possibility that the units proposed at Cañada College may involve demolition. In addition, development proposed in areas of steep terrain in the Western Hills of Woodside may require extensive site preparation. As such, proposed sites for development that do not meet the above BAAQMD screening criteria will require further mitigation.

To ensure projects achieve consistency with the BAAQMD's construction screening criteria or, if consistency with the construction screening criteria cannot be demonstrated, the Town is incorporating **Mitigation Measure AQ-1 and AQ-2** into future project development projects. MM AQ-1 requires future project development projects to implement the BAAQMD's Basic Construction Measures to control fugitive dust emissions generated during construction activities.

MM AQ-2 requires future projects that cannot meet construction screening criteria to prepare a detailed construction air quality impact assessment to: 1) estimate potential project construction emissions; 2) compare potential project construction emissions against BAAQMD project-level construction thresholds of significance; and 3) incorporate measures to reduce construction

emission impacts to levels below the BAAQMD’s construction thresholds of significance for criteria air pollutants and TACs. As such, this impact would be less than significant with mitigation.

Operations

Assuming full buildout of the Proposed Project, long term occupancy (i.e., operations) has the potential to result in air quality impacts from area, energy, and mobile sources. Long-term emissions of criteria air pollutants and precursors, including mobile-, energy-, and area-source emissions, were quantified for the Proposed Project. Table 3.2-6 summarizes the daily operational emissions associated with the Proposed Project.

As shown in Table 3.2-6, the Proposed Project’s net operational emissions would not exceed the BAAQMD’s significance thresholds for any of the pollutants. The increase in ROG emissions is primarily attributed to consumer product use in residential land uses, while mobile source emissions contribute a majority of NO_x, PM₁₀, and PM_{2.5} emissions. Given that the operation of the Proposed Project would not exceed BAAQMD’s significance thresholds, operational air quality impacts are less than significant.

Table 3.2-6: Estimated Unmitigated Criteria Pollutant Emissions from Operation of the Proposed Project

Scenario/Source Category	Maximum Daily Emissions (lb/day) ^a				
	ROG	NO _x	CO	PM ₁₀	PM _{2.5}
<i>Existing Conditions</i>					
Mobile Sources	4.59	3.23	38.7	11.6	2.98
Area Sources	299	9.65	382	1.04	0.91
Energy Sources	3.95	70.3	49.8	5.45	5.45
Existing Total	307.5	83.2	470.5	18.1	9.3
<i>Proposed Project</i>					
Mobile Sources	6.21	4.36	52.2	15.7	4.01
Area Sources	319	12.1	407	1.23	1.10
Energy Sources	4.17	74.1	51.4	5.76	5.76
Proposed Project Total	329.4	90.6	510.6	22.7	10.8
Proposed Project Net Total	21.9	7.4	40.1	4.6	1.5
BAAQMD Threshold	54	54	–	82	54
Exceeds Threshold?	No	No	–	No	No

^a Values may not add up due to rounding.

ROG = reactive organic gases; NO_x = nitrogen oxide; CO = carbon monoxide; PM₁₀ = particulate matter no more than 10 microns in diameter; PM_{2.5} = particulate matter no more than 2.5 microns in diameter; BAAQMD = Bay Area Air Quality Management District

Source: See Appendix D for modeling files.

Mitigation Measures

MM-AQ-1: Implement BAAQMD Basic Construction Mitigation Measures. The Town shall require new project development projects to implement the BAAQMD's Basic Control Mitigation Measures to address fugitive dust emissions that would occur during earthmoving activities associated with project construction. These measures include:

- a) All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- b) All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- c) All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- d) All vehicle speeds on unpaved roads shall be limited to 15 mph.
- e) All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- f) Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
- g) All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- h) Post a publicly visible sign with the telephone number and person to contact at the Town regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

MM-AQ-2: Prepare Project-level Construction Emissions Assessment. The Town shall require new development projects to submit a quantitative project-level construction criteria air pollutant and toxic air contaminant emissions analysis prior to the start of construction activities that shows project construction activities would not exceed BAAQMD project-level thresholds of significance. The analysis may rely on BAAQMD construction screening criteria to demonstrate that a detailed assessment of criteria air pollutant and toxic air contaminant construction emissions is not required for the project. If the project does not satisfy all BAAQMD construction screening criteria, the analysis shall estimate and compare construction criteria air pollutant and toxic air contaminant emissions against the project-level thresholds of significance maintained by BAAQMD and, if emissions are shown to be above BAAQMD thresholds, then the project must implement

measures to reduce emissions below BAAQMD thresholds. Mitigation measures to reduce emissions could include, but are not limited to:

- a) Watering exposed surfaces at a frequency adequate to maintain a minimum soil moisture content of 12 percent, as verified by moisture probe or lab sampling;
- b) Suspending excavation, grading, and/or demolition activities when average wind speeds exceed 20 miles per hour;
- c) Selection of specific construction equipment (e.g., specialized pieces of equipment with smaller engines or equipment that will be more efficient and reduce engine runtime);
- d) Installing wind breaks that have a maximum 50 percent air porosity;
- e) Restoring disturbed areas with vegetative ground cover as soon as possible;
- f) Limiting simultaneous ground-disturbing activities in the same area at any one time (e.g., excavation and grading);
- g) Scheduling/phasing activities to reduce the amount of disturbed surface area at any one time;
- h) Installing wheel washers to wash truck and equipment tires prior to leaving the site;
- i) Minimizing idling time of diesel-powered construction equipment to no more than two minutes or the shortest time interval permitted by manufacturer's specifications and specific working conditions;
- j) Requiring equipment to use alternative fuel sources (e.g., electric-powered and liquefied or compressed natural gas), meet cleaner emission standards (e.g., U.S. EPA Tier IV Final emissions standards for equipment greater than 50-horsepower), and/or utilizing added exhaust devices (e.g., Level 3 Diesel Particulate Filter);
- k) Requiring that all construction equipment, diesel trucks, and generators be equipped with Best Available Control Technology for emission reductions of NO_x and PM;
- l) Requiring all contractors use equipment that meets CARB's most recent certification standard for off-road heavy-duty diesel engines; and
- m) Applying coatings with a volatile organic compound (VOC) that exceeds the current regulatory requirements set forth in BAAQMD regulation 8, Rule 3 (Architectural Coatings).

Significance after mitigation: Less than significant

Impact 3.2-3 Implementation of the Proposed Project would expose sensitive receptors to substantial pollutant concentrations. (Less than Significant with Mitigation Incorporated)

Sensitive land uses are generally considered to include those uses where an exposure to pollutants could result in health-related risks for individuals. Per the BAAQMD, typical sensitive receptors are residences, hospitals, and schools. Parks and playgrounds where sensitive receptors (e.g., children and seniors) are present would also be considered sensitive receptors.⁴⁰ Sensitive receptors are located throughout the Planning Area at residences, schools, and parks (see Figure 3.2-1). Development under the Proposed Project has the potential to expose sensitive receptors to health effects from regional criteria pollutants, localized concentrations of CO, airborne dust containing asbestos, DPM, and PM_{2.5}. These pollutant emissions via Proposed Project construction and operations are discussed below.

Construction TAC Emissions

Future development pursuant to the Project would result in short-term construction-related emissions. Some of these construction emissions would be TACs, which could have an adverse effect on receptors who are exposed to them. Specifically, heavy-duty off-road construction equipment, as well as haul trucks for any soil import / export, would generate exhaust PM_{2.5}, with a portion of the exhaust PM_{2.5} consisting of DPM, which is a TAC.

As detailed under Impact 3.2-2, the majority of residential development pursuant to the Proposed Project would result in a less-than-significant impact related to criteria air pollutants and precursors based on BAAQMD screening criteria. Even so, site-specific details of future projects in the Planning Area are not known at this time, it is reasonable to assume that construction TAC emissions associated with one or more projects developed under implementation of the Proposed Project could have the potential to expose sensitive receptors to substantial TAC concentrations. For example, several sites proposed for development would be located in proximity of existing residential receptors and Cañada College and exposing these existing sensitive receptors to DPM emissions could have the potential to exceed the BAAQMD's cancer and non-cancer thresholds of significance.

Based on the preceding discussion and analysis, implementation of the Proposed Project could have a potentially significant impact with regard to construction TAC emissions that would be generated during construction, which requires mitigation. Accordingly, the Town would implement **Mitigation Measure AQ-1 and AQ-2** into future project development projects. MM AQ-1 requires future project development projects to implement the BAAQMD's Basic Construction Measures to control fugitive dust emissions generated during construction activities. MM AQ-2 requires future projects that cannot meet construction screening criteria to prepare a detailed construction air quality impact assessment to: 1) estimate potential project construction emissions; 2) compare potential project construction emissions against BAAQMD project-level construction thresholds

⁴⁰ Bay Area Air Quality Management District. 2017. *California Environmental Quality Act, Air Quality Guidelines*. May. Available: [https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en](https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en). Accessed: July 1, 2021.

of significance; and 3) incorporate measures to reduce construction emission impacts to levels below the BAAQMD's construction thresholds of significance for criteria air pollutants and TACs.

Therefore, with the implementation of Mitigation Measures AQ-1 and AQ-2, TAC construction emissions associated with the Proposed Project would not result in significant adverse health risks at receptor locations. This impact would be less than significant with mitigation.

Operational TAC Emissions

The residential land uses under the Proposed Project would not include operational sources of TAC emissions such that significant exposures could occur. This impact would be less than significant, because the Proposed Project does not propose land uses that support large stationary sources or that support the types of mobile sources that generate large amounts of TACs. Proposed land uses may include emergency diesel back-up generators or natural gas-fueled boilers that would require permitting by BAAQMD. These types of sources of air pollution would operate in accordance with BAAQMD rules and regulations and not cause significant exposure for on- or off-site sensitive receptors pursuant to BAAQMD permitting requirements.

Therefore, the operational TACs emitted by developments facilitated under implementation of the Proposed Project would not exacerbate existing health risks in the Planning Area, because the Proposed Project does not propose large stationary sources (e.g., industrial sources) or land uses involving the types or quantities of mobile sources that would have the potential to expose receptors to concentrations of TACs that would result in significant health risks. This impact would be less than significant.

Localized Carbon Monoxide Hot Spots

Continuous engine exhaust may elevate localized CO concentrations, resulting in hot spots. Receptors exposed to CO hot spots may have a greater likelihood of developing adverse health effects. CO hot spots are typically observed at heavily congested intersections where a substantial number of gasoline-powered vehicles idle for prolonged durations. The Transportation section details that intersection traffic volumes would not exceed the screening criterion of 24,000 vehicles per hour that the BAAQMD recommends for areas where vertical and/or horizontal mixing is substantially limited. The Proposed Project would not result in, or contribute to, a localized concentration of CO that would exceed the applicable NAAQS or CAAQS. This impact would be less than significant.

Mitigation Measures

MM-AQ-1: Implement BAAQMD Basic Construction Mitigation Measures.

MM-AQ-2: Prepare Project-level Construction Emissions Assessment.

Significance after mitigation: Less than significant

Impact 3.2-4 Implementation of the Proposed Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. (Less than Significant)

Although offensive odors rarely cause physical harm, they can be unpleasant, leading to considerable distress among the public and often generating citizen complaints to local governments and air districts. Odor impacts on residential areas and other sensitive receptors, such as hospitals, day-care centers, and schools, warrant the closest scrutiny, but consideration should also be given to other land uses where people may congregate, such as recreational facilities, work sites, and commercial areas.

According to the BAAQMD, land uses associated with odor complaints typically include wastewater treatment plants, landfills, confined animal facilities, composting stations, food manufacturing plants, refineries, and chemical plants.⁴¹ Residential development does not create substantial odors. Potential odor emitters during construction include diesel exhaust and evaporative emissions generated by asphalt paving and the application of architectural coatings. Construction-related activities near existing receptors would be temporary in nature, and construction activities would not result in nuisance odors. Potential odor emitters during operations would include exhaust from vehicles and fumes from the reapplication of architectural coatings as part of ongoing building maintenance. However, odor impacts would be limited to circulation routes, parking areas, and areas immediately adjacent to recently painted structures. Although such brief exhaust- and paint-related odors may be considered adverse, they would not be atypical of developed suburban areas and would not affect a substantial number of people or rise to the level of a significant impact under CEQA. Because the Proposed Project would not result in a new, substantial, or long-term source of odors, this impact would be less than significant.

Mitigation Measures

None required.

⁴¹ Bay Area Air Quality Management District. 2017. *California Environmental Quality Act, Air Quality Guidelines*. May. Available: https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en. Accessed: July 1, 2021.

3.3 Biological Resources

This section describes the environmental and regulatory setting for biological resources. It also describes impacts related to biological resources that would result from implementation of the Proposed Project and mitigation for significant impacts where feasible and appropriate. The section describes existing biological resources in the Planning Area, including habitats, wetlands and other waters, critical habitat, and special-status species, as well as relevant federal, state, and local regulations and programs.

There were several comments made during the NOP and scoping process expressing concern for biological resources that could be affected by the Proposed Project. These topics are addressed in the Impact Analysis below.

Environmental Setting

PHYSICAL SETTING

Habitat Types

The Town of Woodside contains a wide variety of natural and biological resources, including gentle oak and grassland foothills, flatter valley areas, valley stream corridors containing riparian habitat, as well as flood plains, ground water aquifers and seismic rift zones. The portion of the Town east of Interstate 280 is predominantly mixed oak woodland. The Town's location provides a natural habitat for flora and fauna, including some endangered and threatened plant and wildlife species, while the riparian corridors along the creeks provide corridors for wildlife movement. A variety of current vegetation mapping sources were reviewed for this EIR, including San Mateo County's 106-class Fine Scale Vegetation Map and 26-class Forest Lifeform Map, (GGNRA and Tukman Geospatial LLC 2021a).¹ Natural communities in the Town support a wide diversity of plant and animal species, including a high number of special-status species. According to the 2013 San Mateo County Energy Efficiency Climate Action Plan EIR and consistent with the San Mateo County vegetation maps, there are eleven natural communities present within San Mateo County, though not all are found in Woodside.² These vegetation communities include coastal shoreline, coastal

¹ National Park Service. 2022. San Mateo Fine Scale Vegetation Map Complete. Available:

<https://www.nps.gov/articles/000/san-mateo-fine-scale-vegetation-map-complete.htm>. Accessed: April 20, 2023.

² San Mateo County. 2013. Energy Efficiency Climate Action Plan Draft Environmental Impact Report. Available:

<https://www.smcgov.org/media/73481/download?inline>. Accessed: April 20, 2023. =

marine, salt marsh, freshwater marsh, coastal scrub, chaparral, grassland, woodland savanna, mixed evergreen forest, coniferous forest, and streambank vegetation.

Special-Status Species

Special-status species are defined as:

- Species that are listed as threatened or endangered under the U.S. Fish and Wildlife Service (USFWS) Endangered Species Act or designated as candidates for listing;
- Species that are listed as rare (plants), threatened, or endangered under the California Department of Fish and Wildlife (CDFW) California Endangered Species Act or designated as candidates for listing;
- Wildlife species designated as species of special concern or fully protected by the CDFW;
- Plant species with a California Rare Plant Rank (CRPR), designated as List 1A, List 1B, List 2, and List 3 by the California Native Plant Society (CNPS) Inventory of Rare and Endangered Vascular Plants of California, online edition;
- Species that meet the definition of rare or endangered under the California Environmental Quality Act (CEQA) (under Section 15380 of CEQA, a species not included on any formal list “shall nevertheless be considered rare or endangered if the species can be shown to meet the criteria” for listing); and/or
- Bat species ranked by the Western Bat Working Group as species with a “moderate” or “high” designation status under CEQA.³

Information regarding the occurrences of special-status species in the vicinity of the Planning Area was obtained from a query of the CDFW’s California Natural Diversity Database (CNDDDB). The CNDDDB is regularly updated to track occurrences of previously documented special-status species; however, it contains only those records that have been submitted to CDFW. Therefore, there may be additional occurrences of special-status species within the area that have not yet been surveyed and/or mapped. A lack of information in the CNDDDB about a species or an area does not imply that the species does not occur or that there is a lack of diversity in that area.

Based on the records search, Table 3.3-1 and Table 3.3-2 list 15 special-status plant species and 21 special-status wildlife species that were identified as having the potential to occur within a five-mile radius of the Planning Area. Special-status plant and wildlife species are shown on Figure 3.3-1 and Figure 3.3-2.

³ Western Bat Working Group. 2017. Species Matrix, Based on the Western Bat Working Group Workshop Held in Reno, Nevada, February 9–13, 1998. Available: <http://wbwg.org/matrices/species-matrix/>. Accessed: April 20, 2023.

Table 3.3-1: Special-Status Plant Species with the Potential to Occur in the Planning Area

Scientific Name	Common Name	Status	
		USFWS ¹	CDFW ¹
<i>Serpentine Bunchgrass</i>	Serpentine Bunchgrass	None	None
<i>Acanthomintha duttonii</i>	San Mateo thorn-mint	Endangered	Endangered
<i>Monolopia gracilens</i>	woodland woolly threads	None	None
<i>Plagiobothrys chorisianus</i> var. <i>chorisianus</i>	Choris' popcornflower	None	None
<i>Trifolium amoenum</i>	two-fork clover	Endangered	None
<i>Arctostaphylos regismontana</i>	Kings Mountain manzanita	None	None
<i>Arctostaphylos andersonii</i>	Anderson's manzanita	None	None
<i>Eryngium jepsonii</i>	Jepson's coyote-thistle	None	None
<i>Dirca occidentalis</i>	western leatherwood	None	None
<i>Pentachaeta bellidiflora</i>	white-rayed pentachaeta	Endangered	Endangered
<i>Allium peninsulare</i> var. <i>franciscanum</i>	Franciscan onion	None	None
<i>Fritillaria liliacea</i>	fragrant fritillary	None	None
<i>Hesperolinon congestum</i>	Marin western flax	Threatened	Threatened
<i>Malacothamnus arcuatus</i>	arcuate bush-mallow	None	None
<i>Cirsium fontinale</i> var. <i>fontinale</i>	fountain thistle	Endangered	Endangered

¹ Special status species are considered sufficiently rare that they require special consideration and/or protection. Endangered (Federal & State) are species in danger of extinction throughout all or a significant portion of its range, whereas Threatened (Federal & State) are species likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range. "None" means species are neither Endangered nor Threatened, but still require special consideration.

Source: CNDDDB GIS Data, California Department of Fish and Wildlife, 2023

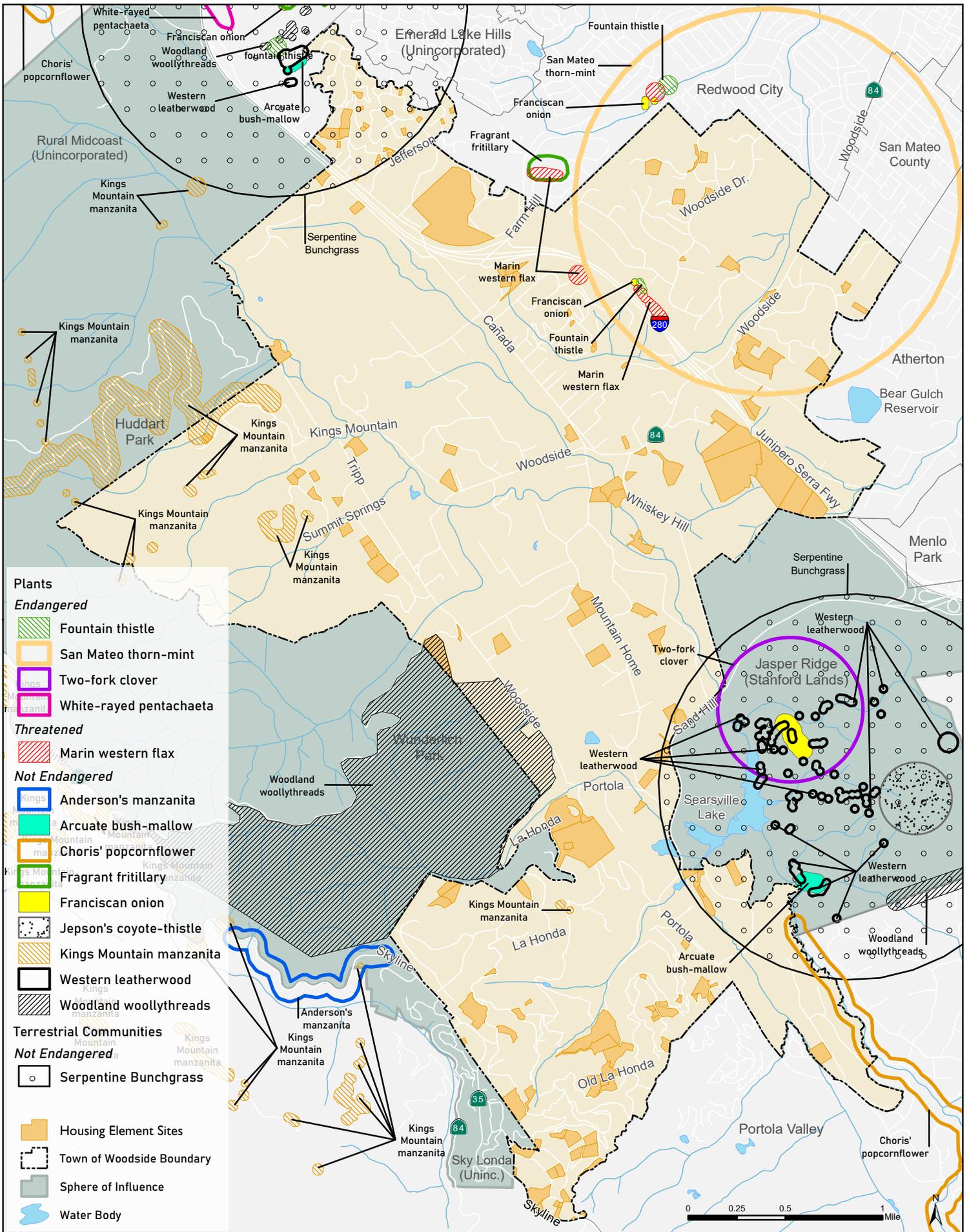
The CNDDDB is regularly updated to track occurrences of previously documented special-status species; however, it contains only those records that have been submitted to CDFW. Therefore, there may be additional occurrences of special-status species within the area that have not yet been surveyed and/or mapped. A lack of information in the CNDDDB about a species or an area does not imply that the species does not occur or that there is a lack of diversity in that area.

Table 3.3-2: Special-Status Animal Species with the Potential to Occur in the Planning Area

Scientific Name	Common Name	Status	
		USFWS ¹	CDFW ¹
Thamnophis sirtalis tetrataenia	San Francisco gartersnake	Endangered	Endangered
Falco peregrinus anatum	American peregrine falcon	Delisted	Delisted
Bombus caliginosus	obscure bumble bee	None	None
Dicamptodon ensatus	California giant salamander	None	None
Lasiurus cinereus	hoary bat	None	None
Rana boylei pop. 4	foothill yellow-legged frog - central coast DPS	Proposed Threatened	Endangered
Microcina edgewoodensis	Edgewood Park micro-blind harvestman	None	None
Dipodomys venustus venustus	Santa Cruz kangaroo rat	None	None
North Central Coast Steelhead/Sculpin Stream	North Central Coast Steelhead/Sculpin Stream	None	None
Corynorhinus townsendii	Townsend's big-eared bat	None	None
Antrozous pallidus	pallid bat	None	None
Bombus occidentalis	western bumble bee	None	Candidate Endangered
Taxidea taxus	American badger	None	None
Aneides niger	Santa Cruz black salamander	None	None
Euphydryas editha bayensis	Bay checkerspot butterfly	Threatened	None
Rana draytonii	California red-legged frog	Threatened	None
Geothlypis trichas sinuosa	saltmarsh common yellowthroat	None	None
Emys marmorata	western pond turtle	None	None
Neotoma fuscipes annectens	San Francisco dusky-footed woodrat	None	None
Icaricia icarioides missionensis	Mission blue butterfly	Endangered	None
Ambystoma californiense pop. I	California tiger salamander - central California DPS	Threatened	Threatened

1. Special status species are considered sufficiently rare that they require special consideration and/or protection. Endangered (Federal & State) are species in danger of extinction throughout all or a significant portion of its range, whereas Threatened (Federal & State) are species likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range. "None" means species are neither Endangered nor Threatened, but still require special consideration.

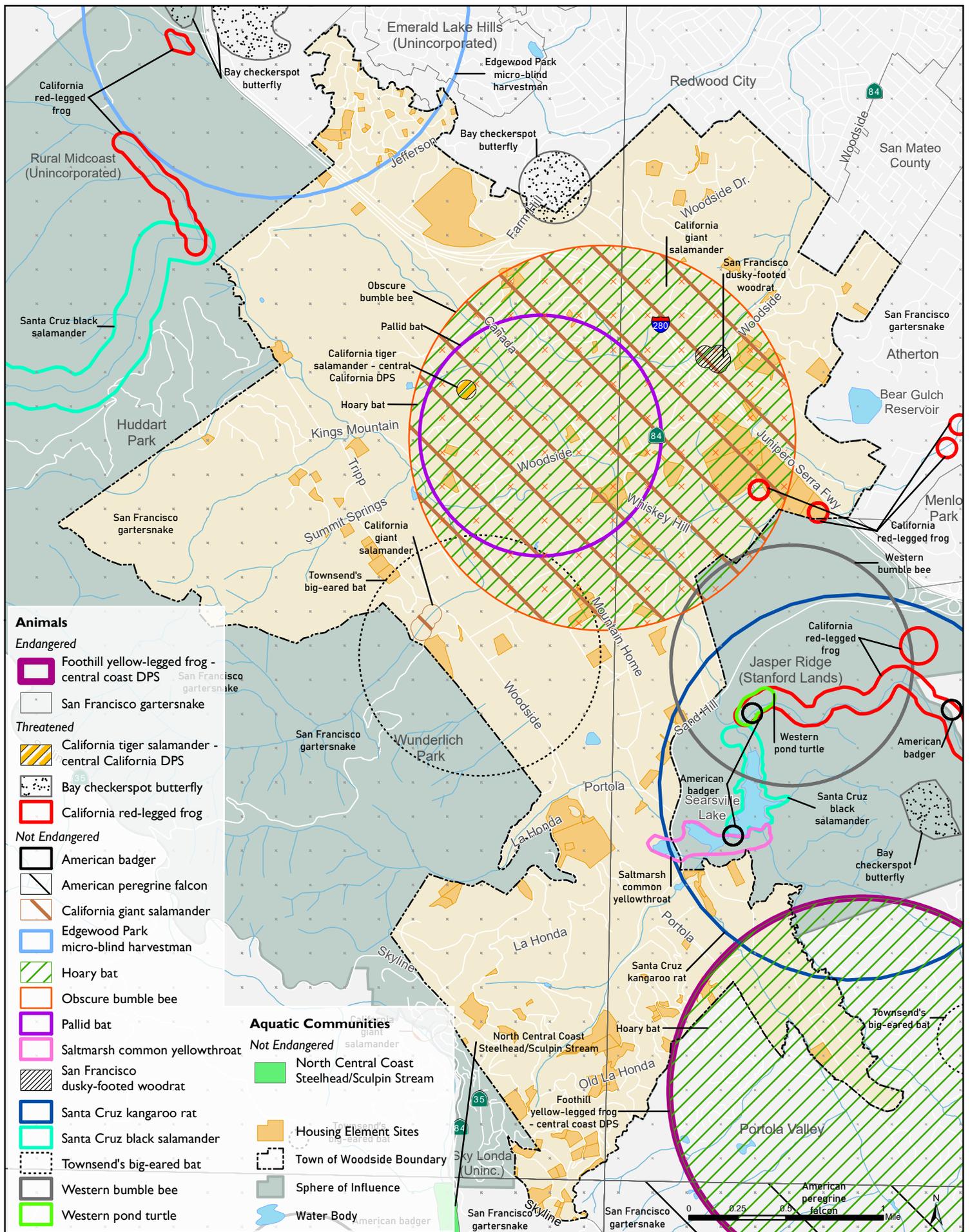
Source: CNDDDB GIS Data, California Department of Fish and Wildlife, 2023



3.3-1 Special Status Plant Species Occurrences

Town of Woodside

Source: CNDDB, June 2023; Dyett & Bhatia, 2024



3.3-2 Special Status Animal Species Occurrences Town of Woodside

Buildout of the Proposed Project would involve construction of small-scale infill housing on many sites identified on the inventory, typically of not more than three single-family residences. Typically, such projects would not have a significant effect on the environment and thus qualify for an exemption from CEQA, such as the Class 3 Categorical Exemption. Buildout of the larger scale projects -- the Cañada College site, Town-owned High Road and Raymundo Drive sites, and 773 Cañada Road site -- could have a significant direct or indirect impact on special-status species if it would result in the removal, disturbance, or degradation of the species or potentially suitable habitat. To understand the extent of impact on these sites, four field studies were prepared by H.T. Harvey and Associates and their findings will be discussed in the impacts assessment. Field studies can be found in Appendix E.

Sensitive Habitats

Wildlife and Habitat Connectivity

The California Essential Habitat Connectivity Project: A Strategy for Conserving a Connected California was designed to support land use planning and transportation. The report was produced by a multidisciplinary team of representatives from 62 agencies, along with a smaller technical advisory team and steering committee. The report includes a statewide essential habitat connectivity map, data collected to delineate areas shown on the map, recommendations for correcting the fragmentation caused by roads, and guidance for developing and implementing local and regional connectivity plans. Analysis was conducted to determine where mitigation would be most effective and how best to enhance connectivity while lessening vehicle/wildlife collisions.⁴

The Planning Area contains a wide variety of natural and biological resources, including gentle oak and grassland foothills, flatter valley areas, valley stream corridors containing riparian habitat, as well as flood plains, ground water aquifers and seismic rift zones. The riparian corridors along the creeks provide habitat and movement corridors for wildlife. Thus, portions of Planning Area are within a regional wildlife movement corridor ranking from the highest to lowest in value: irreplaceable and essential connectivity, conservation planning linkages, connections with implementation flexibility, large natural habitat areas, and limited connectivity opportunity, as indicated by CDFW's Biogeographic Information and

Observations System Habitat Connectivity Viewer.⁵ As shown on Figure 3.3-3, the western part of the Planning Area is where the highest ranked connectivity (irreplaceable and essential) is located while the southeastern part of the Planning Area is mostly considered as connections with implementation flexibility and conservation planning linkages. Otherwise, the central and

⁴ Spencer, W.D., P. Beier, K. Penrod, K. Winters, C. Paulman, H. Rustigian-Romsos, J. Strittholt, M. Parisi, and A. Pettler. 2010. California Essential Habitat Connectivity Project: A Strategy for Conserving a Connected California. Prepared for California Department of Transportation, California Department of Fish and Game, and Federal Highways Administration.

⁵ California Department of Fish and Wildlife. n.d. Biogeographic Information and Observation System. Version 5.96.99. Available: <https://apps.wildlife.ca.gov/bios6/?bookmark=648> .Accessed: March 1, 2024.

northeastern part of the Planning Area have limited connectivity opportunity and therefore are not areas within a regional wildlife movement corridor.

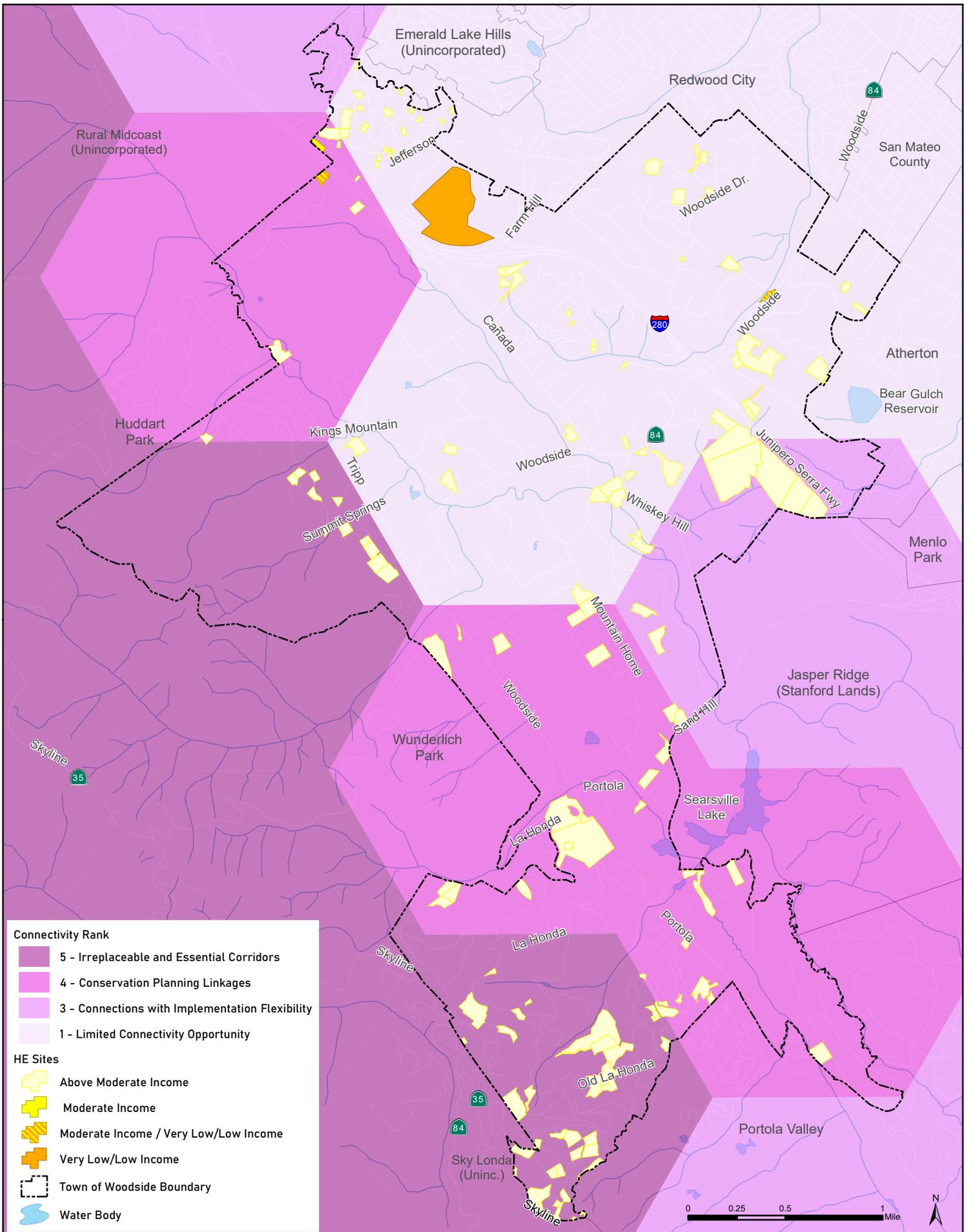
Critical Habitat

Critical habitat is defined by the federal Endangered Species Act as a specific geographic area that contains features essential for the conservation of a threatened or endangered species and may require special management and protection. Critical habitats, designated by the USFWS in and around the Planning Area are shown on Figure 3.3-4. San Mateo County is a critical habitat for the California red-legged frog, particularly a part of the southern portion of the Planning Area. The northwestern portion of the Planning Area, bordering Huddart Park, also serves as a critical habitat for the Marbled murrelet species. Located outside of the Planning Area, critical habitat for Bay checkerspot butterfly is found in the Jasper Ridge Biological Preserve and directly north of Planning Area.

Wetlands and Other Waters

Wetlands and other waters are within the Planning Area. Wetlands are areas where water covers the soil or is present either at or near the surface of the soil all year or for varying periods of time during the year, including during the growing season. Water saturation (hydrology) largely determines how the soil develops and the types of plant and animal communities living in and on the soil. Wetlands may support both aquatic and terrestrial species. The prolonged presence of water creates conditions that favor the growth of specially adapted plants (hydrophytes) and promote the development of characteristic wetland (hydric) soils. Other waters encompass feature types that contain or convey water, including marine, estuarine, riverine, and lacustrine features. Wetlands and other waters provide a multitude of ecological, economic, and social benefits. They provide habitat for fish, wildlife, and plants; allow for groundwater recharge; reduce flooding; and support cultural and recreational activities.

As discussed within the Regulatory Framework section, technical standards for delineating wetlands and other waters have been developed by the U.S. Army Corps of Engineers (USACE) and the USFWS. Based on existing information from the USFWS National Wetlands Inventory (2021), there are riverine (other water) features within the southeastern portion of the Planning Area, near Searsville Lake. These features, marshes located along Sand Hill Road, support (or have the potential to support) seasonal wetland vegetation within their beds and riparian vegetation along their banks. However, this does not preclude future identification of wetlands during site-specific studies. In addition, the San Francisquito Creek tributary system is the last free-flowing urban creek on the southern Peninsula of San Francisco Bay. The watershed and floodplain of San Francisquito Creek encompass almost 40 square miles, originating on the east-facing slopes of the Santa Cruz Mountains and flowing to the San Francisco Bay. The tributaries of the creek include at least 22 named streams, several of which flow through Woodside.



3.3-3 Habitat Connectivity

Town of Woodside

REGULATORY SETTING

Federal Regulations

Federal Endangered Species Act

USFWS and the National Marine Fisheries Service (NMFS) administer the federal Endangered Species Act (FESA). FESA requires each agency to maintain lists of imperiled native species and affords substantial protections to these “listed” species. NMFS’ jurisdiction under FESA is limited to the protection of marine mammals, marine fishes, and anadromous fishes; all other species are subject to USFWS jurisdiction. USFWS and NMFS may “list” a species if it is endangered (at risk of extinction throughout all or a significant portion of its range) or threatened (likely to become endangered within the foreseeable future). Section 9 of FESA prohibits the “take” of any wildlife species listed as endangered and most species listed as threatened. Take, as defined by FESA, means “to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect or to attempt to engage in any such conduct.” Harm is defined as “any act that kills or injures the species, including significant habitat modification or degradation where it actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding, or sheltering” (50 Code of Federal Regulations 17.3). FESA includes exceptions to general take prohibition that allow an action to be carried out, despite the fact that the action may result in take of listed species where conservation measures are included for the species. Section 7 of FESA provides an exception for actions authorized (e.g., under a Section 404 permit), funded, or carried out by a federal agency, and Section 10 provides an exception for actions that do not involve a federal agency.

Federal Clean Water Act, Section 404

The Clean Water Act (CWA) is the primary federal law that protects the quality of the nation’s waters, including wetlands, lakes, rivers, and coastal areas. Section 404 of the Clean Water Act regulates the discharge of dredged or fill material into the waters of the United States, including wetlands. The Clean Water Act holds that all discharges into the nation’s waters are unlawful unless specifically authorized by a permit; issuance of such permits constitutes its principal regulatory tool. The USACE is authorized to issue Section 404 permits, which allow the placement of dredged or fill materials into jurisdictional waters of the United States under certain circumstances. The USACE issues two types of permits under Section 404: general permits, which are either nationwide permits or regional permits, and standard permits, which are either letters of permission or individual permits. General permits are issued by the USACE to streamline the Section 404 permitting process for nationwide, statewide, or regional activities that have minimal direct or cumulative environmental impacts on the aquatic environment. Standard permits are issued for activities that do not qualify for a general permit because they may have more than a minimal adverse environmental impact.

Federal Clean Water Act, Section 401

Under the Clean Water Act Section 401, applicants for a federal license or permit to conduct activities that may result in the discharge of a pollutant into waters of the United States must obtain certification from the State in which the discharge would originate. Therefore, all projects that have a federal component and may affect State water quality, including projects that require federal

agency approval, such as issuance of a Section 404 permit, must also comply with Clean Water Act Section 401 and the State's Porter-Cologne Water Quality Control Act. In California, Section 401 certification is handled by the nine Regional Water Quality Control Boards (RWQCBs) and the State Water Resources Control Board (SWRCB). The Town falls under the jurisdiction of the San Francisco Bay RWQCB. The San Francisco Bay RWQCB must certify that the discharge will comply with State water quality standards and other requirements of the Clean Water Act.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act of 1918 (MBTA), as amended, implements various treaties and conventions between the United States and Canada, Japan, Mexico, and the former Soviet Union for the protection of migratory birds. Migratory birds are all wild birds found in the United States, except the house sparrow, starling, feral pigeon, and resident game birds. Under the MBTA, taking, killing, or possessing migratory birds is unlawful, as is taking of any parts, nests, or eggs of such birds (16 United States Code 703). Take is defined more narrowly under the MBTA than under FESA and includes only death or injury involving individuals of a migratory bird species or its eggs. As such, take under the MBTA does not include the concepts of harm and harassment, as defined under FESA. Within the Planning Area, the American peregrine falcon is the only listed and protected species by the MBTA. As shown on Table 3.3-2, the American peregrine falcon was delisted by USFWS and CDFW due to diligent conservation and recovery efforts.

State Regulations

California Endangered Species Act

Administered by the CDFW, the California Endangered Species Act (CESA) prohibits the take of listed species and also species formally under consideration for listing in California, referred to as *candidate species*. Under CESA, "take" means "hunt, pursue, catch, capture, or kill or attempt to hunt, pursue, catch, capture, or kill." (California Fish and Game Code Section 86.) Under this definition, in contrast to FESA, CESA does not prohibit "harm" to a listed species. Furthermore, take under CESA does not include "the taking of habitat alone or the impacts of the taking." However, the killing of a listed species that is incidental to an otherwise lawful activity and not the primary purpose of the activity constitutes take under CESA. CESA does not protect insects but, with certain exceptions, does prohibit take of plants on private land.

Natural Community Conservation Planning Act

The Natural Community Conservation Planning Act was enacted to implement broad-based planning and provide effective protection and conservation of California's wildlife heritage while allowing appropriate development and growth. The Natural Community Conservation Planning Act does not focus on only listed species. It is broader in its orientation and objectives compared with FESA and CESA. The Natural Community Conservation Planning Act encourages local, State, and federal agencies to prepare comprehensive conservation plans that maintain the continued viability of species and biological communities that have been affected by human changes to the landscape. The Natural Community Conservation Planning Act provides for incidental take authorization such that covered activities resulting in incidental take of listed species may be carried out without violating CESA. Permits issued under the Natural Community Conservation Planning Act can also be broad and may include both listed species and non-listed species.

State Fish and Game Code, Sections 1600–1616

The CDFW has jurisdictional authority over streams and lakes, as well as wetland resources associated with these aquatic systems, under California Fish and Game Code Section 1600 et seq. The CDFW has the authority to regulate work that will “substantially divert or obstruct the natural flow of, or substantially change or use any material from, the bed, channel, or bank of any river, stream, or lake or deposit or dispose of debris waste or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake” (California Fish and Game Code Section 1602.). An entity that proposes to carry out such an activity must first inform the CDFW. Where the CDFW concludes that the activity will “substantially adversely affect an existing (2014) fish or wildlife resource,” the entity proposing the activity must negotiate an agreement with the CDFW that specifies terms under which the activity may be carried out in a way that protects the affected wildlife resource. CDFW also has authority over actions that may disturb or destroy active nest sites or take birds. Fish and Game Code sections 3503, 3503.5, and 3513 protect birds, their eggs, and nests.

Porter-Cologne Water Quality Control Act

California Water Code Section 13260 requires “any person discharging waste, or proposing to discharge waste, in any region that could affect the waters of the State to file a report of discharge (an application for waste discharge requirements [WDRs]).” Under the Porter-Cologne Water Quality Control Act definition, *waters of the State* are “any surface water or groundwater, including saline waters, within the boundaries of the State.” Although all waters of the United States that are within the borders of California are also waters of the State, the reverse is not true. Accordingly, California retains authority to regulate discharges of waste into any waters of the State, regardless of whether the USACE has concurrent jurisdiction under CWA Section 404. If USACE determines that a wetland is not subject to regulation under Section 404, CWA Section 401 water quality certification is not required. However, the RWQCB may impose WDRs if fill material is placed into waters of the State.

California Native Plant Protection Act

The California Native Plant Protection Act of 1977 (CNPPA) prohibits importation of rare and endangered plants into California, take of rare and endangered plants, and the sale of rare and endangered plants. CESA defers to the CNPPA, which ensures that State-listed plant species are protected when State agencies are involved in projects subject to CEQA. In that case, plants listed as rare under the CNPPA are not protected under CESA but rather under CEQA.

Local Regulations

Town of Woodside Municipal Code (Municipal Code)

Several sections within the Municipal Code have been adopted to maintain ecological balances and ensure the maximum preservation of the valuable natural character as stated in the General Plan of the Town. The local tree protection regulations (Sections 153.430 – 153.439) establish minimum standards and requirements for the protection of trees. The local Stream Corridor regulations (Sections 153.440 – 153.445) identify what uses are permitted within locally designated Stream

Corridors. It states a protected stream corridor extends a horizontal distance of 50 feet measured from each side of the centerline of the stream, or 25 feet measured from the top of bank, whichever is greater, and the Planning Commission may establish greater horizontal measurements for specific stream corridors. The Design Standards and Requirements for grading and drainage outlined in Chapter 151, Article III, addresses winterization, erosion control, drainage, and grading concerns to limit the disturbance of development from proposed development. The Development Standards for Environmentally Sensitive Areas and Features outlined in the Municipal Code (Section 153.400 – 153.445) requires the use of native vegetation and the maximum retention of natural features such as drainage swales, streams, slopes, ridgelines, rock outcrops, vistas, trees and plant communities.

Town of Woodside 2012 General Plan (General Plan)

Two elements of the General Plan include the goals and policies associated with biological resources: the Conservation Element and the Open Space Element.

The goal of the Conservation Element is to preserve, protect, and enhance the natural features, resources, and wildlife of the Planning Area, which is essential to maintaining the health and quality of its natural environment and the broader ecosystem. The following policies are associated with biological resources:

Policy CV1.1: Plan Development to be Sensitive to Preservation of Natural Features and Landscape. Using design review, preliminary concept review, biotic reports, and environmental review, the Town will identify and mitigate potential impacts of development projects.

Policy CV1.2: Protect Riparian Corridors and Water Quality. The Town will mitigate the potential impacts of chemical discharges, animal waste, on-site septic systems, and surface water runoff through regulatory strategies.

Policy CV1.3: Retain and Restore Native Flora and Fauna Habitat and Populations. The Town will retain and restore flora and fauna habitat to the extent feasible in addition to ensuring compliance with State and federal law.

Policy CV1.6: Pursue Collaborative Efforts. The Town will participate in, or support, conservation efforts of other jurisdictions, agencies or organizations that are of mutual benefit.

Policy CV1.7: Review Regulations to Implement Conservation Policies. The Town will review and assess existing Town regulations and update as needed to conserve the resources of the Woodside Planning Area.

Policy CV1.8: Collect Biological and Geological Data. The Town will refine its inventory of important natural resources, such as streams, bodies of water, wildlife habitat, vegetation, and geological features, so that they may be more easily identified during project review and specific measures can be designed for their protection.

Policy CV1.9: Promote Education and Conservation Actions. The Town will institute or participate in education and information programs which aid the community in preserving, protecting, and enhancing natural resources.

The goal of the Open Space Element is to conserve, protect, and enhance the open space system by minimizing disturbance of the natural terrain and vegetation, conserving wildlife habitat and other areas of major or unique ecological significance, and ultimately ensuring the health and quality of the natural environment and the broader ecosystem. The following policies are associated with biological resources:

Policy OS1.1: Review All Development to Ensure Preservation of Open Space. By updating and preparing guidelines and regulations, focusing on wildlife corridors, and conservation easements, the Town will preserve open space resources and create harmony between its rural character and natural resources.

Policy OS1.2: Enhance Connectivity Between Open Space Areas. The Town will identify and act upon opportunities to enhance connectivity of the open spaces in the review of new development applications.

Policy OS1.3: Expand the Open Space System. Identify, encourage, and support opportunities to expand the open space system by accepting easements, rezoning property at the request of owners, and encourage expansion programs.

Policy OS1.7: Establish Educational Programs. Establish an open space education program by performing outreach and encouraging participation in the Backyard Habitat program.

Impact Analysis

SIGNIFICANCE CRITERIA

For the purposes of this EIR, a significant impact would occur if implementation of the Proposed Project would:

- Criterion 1:** Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service;
- Criterion 2:** 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;
- Criterion 3:** Have a substantial adverse effect on federally protected wetlands, as defined by Section 404 of the Clean Water Act (including, but not limited to, marshes,

vernal pools, coastal areas, etc.), through direct removal, filling, hydrological interruption, or other means;

Criterion 4: 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;

Based on the findings of the Initial Study circulated with the Notice of Preparation, it was determined that impacts related to the following criteria would be less than significant: conflict with any local policies or ordinances protecting biological resources, as well as conflict with any adopted habitat conservation plans. Accordingly, these criteria are not analyzed further here. The Initial Study is included in Appendix A.

METHODOLOGY AND ASSUMPTIONS

The Proposed Project's Planning Area was compared against existing biological conditions to determine potential impacts on biological resources that could result from implementation of the Proposed Project. Most of the buildout of the Proposed Project (small-scale infill housing, typically of not more than three single-family residences or multi-family residential structures designed for not more than six dwelling units) would not have a significant effect on the environment and thus likely qualify for an exemption from CEQA, such as the Class 3 Exemption. Larger scale projects anticipated with buildout of the Proposed Project, including the Cañada College site, the Town-owned High Road and Raymundo Drive sites, and the 773 Cañada site, could have impacts on biological resources. Field studies for the four sites, included in Appendix E, were conducted to assess potential impacts. Information regarding the occurrences of these special-status species in the vicinity of the Planning Area was obtained from a query of the CDFW's California Natural Diversity Database (CNDDDB) using a five-mile radius of the Planning Area. Future project-specific detailed biological surveys may be necessary to confirm the presence or absence of sensitive resources on future development sites. Impacts associated with future development as a result of the Proposed Project implementation are analyzed qualitatively at a program level and specific to the four larger project sites.

IMPACTS

Impact 3.3-1 Implementation of the Proposed Project would not have a substantial adverse effect, either directly or through habitat modifications, on species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. (Less than Significant with Mitigation Incorporated)

A range of special-status species have been documented in and around the Planning Area, as described above in the Environmental Setting and listed in Tables 3.3-1 and 3.3-2. Areas that may provide habitat for special-status plant species are located in the southern portion of the Planning Area near Searsville Lake, in the western portion of the Planning Area near Huddart Park, and east of Interstate-280. Areas that may provide habitat for special-status animal species are located in the

central portion of the Planning Area, the northern portion of Planning Area, particularly near the 773 Cañada Road and Raymundo Drive sites, and in the southern portion of the Planning Area along the Woodside and Portola Valley border.

As shown in Tables 3.3-1 and 3.3-2, there are 21 special-status wildlife species and 15 special-status plant species with potential to occur within a five-mile radius of the Planning Area. Many of the special-status species with potential to occur in the Planning Area, including nine animal species and eleven plant species, have not been documented on or near the Proposed Project's sites identified for housing development. Animal species include: American peregrine falcon, North Central Coast Steelhead/Sculpin Stream, American badger, Santa Cruz black salamander, Bay checkerspot butterfly, saltmarsh common yellowthroat, western pond turtle, San Francisco dusky-footed woodrat, California tiger salamander - central California DPS. Plant species include: Choris' popcornflower, two-fork clover, Anderson's manzanita, Jepson's coyote-thistle, western leatherwood, white-rayed pentachaeta, Franciscan onion, fragrant fritillary, Marin western flax, arcuate bush-mallow, and fountain thistle.

As shown in Figure 3.3-1 and 3.3-2, only a select number of special-status species have been documented on or near the Proposed Project's sites identified for housing development. These species include eleven animal species and four plants species, which are California giant salamander, California red-legged frog, Edgewood Park micro-blind harvestman, foothill yellow-legged frog - central coast DPS, hoary bat, obscure bumble bee, pallid bat, San Francisco garter snake, Santa Cruz kangaroo rat, Townsend's big-eared bat, western bumble bee, Kings Mountain manzanita, San Mateo thorn-mint, Serpentine Bunchgrass, and woodland woolly threads. According to the San Francisco Public Utilities Commission (SFPUC) biologist, Mission blue butterfly occurrences have also been documented west and northwest of Raymundo Drive.⁶

Buildout of the Proposed Project would involve construction of small-scale residential projects, as well as higher density housing at 773 Cañada Road, Raymundo Drive at Runnymede Road, High Road at Woodside Road, and Cañada College. Specifically for all higher density housing sites, the following species have no potential for occurrences on the project sites according to the field studies prepared by H.T. Harvey and Associates: Western bumble bee, California tiger salamander, California red-legged frog, and San Francisco garter snake. However, these species may have the potential to occur within a five-mile radius of the Planning Area.

Serpentine needlegrass grassland was identified at the Cañada College site, and as such, suitable habitat is present for several special-status plant and animal species that are known to occur in serpentine habitats. The dominant species present within this habitat is needlegrass, with the possibility of an array of special-status plant species occurring, including San Mateo thorn-mint, Marin western flax, fragrant fritillary, and woodland woolly threads. Further, three nests of San Francisco dusky-footed woodrats are present in coast live oak woodland habitat on the High Road site. Other special-status animal species that may occur in Serpentine needlegrass grassland habitat include the Bay checkerspot butterfly. The Bay checkerspot butterfly was reintroduced to

⁶ E. Wu, personal communication, April 15, 2024.

Edgewood Park in 2011, but the number of individuals present has dwindled to the point that there is no reasonable expectation that any individuals would disperse to Cañada College site.⁷

Given the extent of biological resources throughout the community, future development under the Proposed Project would have a significant direct or indirect impact on special-status species if it would result in the removal or degradation of the species or suitable habitat. If future development were to substantially degrade or remove suitable habitat for special-status species or result in adverse impacts on special-status individuals, there could be significant impacts on special-status species. This could occur because of construction activities or from ongoing operation and/or maintenance of a development project subsequent to the Proposed Project.

The General Plan Conservation Element incorporates policies intended to preserve, protect, and enhance the natural features and wildlife of the Town of Woodside. Policy CV1.1 requires that development be planned sensitively to preserve natural features and landscape and includes a strategy where if a species of concern is identified on a case-by-case basis, the Town shall require preparation of biotic reports and pre-construction surveys by a professional biological consultant in order to identify and mitigate potential impacts. Policy CV1.3 of the Conservation Element also requires retention and restoration of native flora and fauna habitat and populations by minimizing the removal of vegetation, using native and fire-resistant plants, avoiding topsoil destruction, and avoiding impacts to habitat and wildlife corridors by use of structures and fences.

General Plan policies would serve to reduce significant impacts on sensitive natural habitat and wildlife. However, given the extent of biological resources that exist in the Planning Area, the potential for impacts to some particular special-status species remains. Therefore, to address potential significant impacts to special-status species, **Mitigation Measure BIO-1** would require the installation of temporary flagging or barrier fencing to protect sensitive biological resources adjacent to the work area as warranted based on the findings of the site assessment completed. Further, Mitigation Measures **BIO-2** through **BIO-10** outline additional construction requirements to ensure the protection of serpentine grassland, special-status plant and special-status butterfly host plant species, and special-status animal species, as warranted based on the findings of the site assessments. Therefore, with implementation of **Mitigation Measures BIO-1** through **BIO-10** and adherence to existing policies and local regulations, as discussed above, the impacts of future development under the Proposed Project on special-status species would be less than significant.

Mitigation Measures

MM-BIO-1: Install Temporary Flagging or Barrier Fencing to Protect Sensitive Biological Resources Adjacent to the Work Area. If required pursuant to pre-construction surveys, a qualified biologist with prior experience for subject species in San Mateo County shall identify and flag or fence sensitive biological habitat on-site to ensure it is avoided during construction and pre-construction activities. Flagging or fencing shall be installed prior to site preparation activities and remain in place for the duration of construction activities.

⁷ H.T. Harvey & Associates. 2023. Cañada College Residential Project Biological Resources Report.

MM-BIO-2: Avoid and Minimize Disturbance to Special-Status Plant Species and Special-Status Butterfly Host Plant Species. If necessary pursuant to the results of pre-construction surveys, the work area shall be modified to the extent feasible to avoid indirect or direct impacts on special-status plants. Special-status plant and special-status butterfly host plant species shall be avoided whenever possible by delineating and observing a no disturbance buffer of at least 50 feet from the outer edge of the plant population(s) or specific habitat type(s) required by special status or host plant species. If complete avoidance of special-status plants or special-status butterfly host plants is not feasible, at a minimum the special-status plant or host species shall be relocated on-site, at least 20 feet away from construction directly relating to the project. All site preparation, seed/cutting/root collection, grow-out, and plant installation shall be conducted by a landscape company approved by the Town of Woodside with experience working on restoration projects and within the habitats present on-site. Following the relocation, the plantings/seedings shall be monitored annually for five years or longer by a botanist paid for and hired by the project proponent to determine the success of the relocation. For individual plants, success criteria is the establishment of new viable occurrences equal to or greater in number than the number of plants impacted, for at least three years without supplemental care such as watering. On-site maintenance of the relocated plants shall be contracted to a landscaping company which will also be paid for and hired by the project proponent. An annual report by a botanist detailing the success of the relocation shall be drafted and submitted to all responsible agencies (e.g., CDFW, USFWS) for their review. If success criteria are not met, management of the relocated plants will be modified as needed, but management and reporting shall continue until success criteria are met.

MM-BIO-3: Disturbance to Serpentine Needlegrass Grassland Habitat. When preparing detailed plans for development, the developer shall avoid impacts to serpentine needlegrass grassland, or at least minimize such impacts, to the extent practicable. If all impacts on this habitat are avoided, further mitigation is not necessary. If any serpentine needlegrass grassland will be impacted, the following measures will be implemented:

To compensate for unavoidable effects to serpentine needlegrass grassland, the project shall protect, enhance, and manage serpentine communities outside of the project site at a 2:1 (impact: mitigation) ratio, on an acreage basis. Compensatory mitigation may be carried out through one or more of the following methods, in order of preference:

- a) Preservation via acquisition of land supporting serpentine communities via fee title or purchase of a conservation easement
- b) Contribute to the management of existing serpentine communities (e.g., at Edgewood Park)
- c) The restoration or enhancement of previously existing or degraded serpentine communities

d) In coordination with USFWS, the project proponent will develop a Habitat Mitigation and Management Plan (HMMP), describing the measures that will be taken to enhance and manage the mitigation lands and to monitor the effects of management on serpentine communities. The developer then must apply to USFWS for an incidental take permit. That plan will include, at a minimum, the following:

- A summary of impacts to serpentine needlegrass grassland and the proposed mitigation
- A description of the location and boundaries of the mitigation site and description of existing site conditions
- A description of measures to be undertaken if necessary to enhance (e.g., through focused management) the mitigation site for serpentine communities
- Proposed management activities, such as managed grazing and management of invasive plants, to maintain high-quality serpentine communities
- A description of community monitoring measures on the mitigation site, including specific, objective goals and objectives, performance indicators, success criteria, monitoring methods, data analysis, reporting requirements, and monitoring schedule. Determining specific performance/success criteria requires information regarding the specific mitigation site, its conditions, the biological resources present on the site, and the specific enhancement and management measures tailored to that site and its conditions. As a result, those specific criteria will be defined in the HMMP (rather than in this EIR). Nevertheless, the performance/success criteria shall be defined to ensure that the result of the mitigation is the management and protection of high-quality serpentine communities that adequately compensate for the functions and values of the impacted communities.
- A description of the management plan's adaptive component, including potential contingency measures for mitigation elements that do not meet performance criteria
- A description of the funding mechanism to ensure the long-term maintenance and monitoring of the mitigation lands

MM-BIO-4: Disturbance to Bat Species. If required pursuant to pre-construction surveys, a qualified biologist paid for and hired by the applicant shall conduct preconstruction surveys for bats, which shall take place during the maternity roosting season (defined as: April 1 through August 31) within riparian habitat and any old wooden buildings within a project site. Surveys shall be conducted no less than 14 days prior to removal of trees, snags, or buildings within the project area. Ultrasonic acoustic surveys and/or other site appropriate survey method may be performed to

determine the presence or absence of bats utilizing the project site as roosting or foraging habitat. Additionally, the following measures shall be implemented to lessen impacts to bats: If special-status bat species are detected during surveys, species and roost specific mitigation measures shall be developed by the qualified biologist. Such measures may include postponing removal of trees, snags, or structures until the end of the maternity roosting season or construction of species appropriate roosting habitat within, or adjacent to the project site.

- a) Trees, snags, and buildings may be removed outside of the maternity roosting season without performing preconstruction bat surveys.
- b) Felled trees shall remain on the ground for 24 hours prior to being removed or chipped.
- c) For all buildings to be demolished, internal entrance surveys shall be performed by a qualified bat biologist no less than 14 days prior to demolition to determine if buildings currently or previously supported roosting bats. If bats are determined to be present, appropriate methods shall be used to exclude bats from the building. Such methods may include installation of one way “valves” to allow bats to exit, but not allow them to reenter the building.
- d) If an identified maternity roost location is removed, species and roost appropriate mitigation shall be developed in consultation with CDFW. Mitigation shall include at minimum the replacement of a suitable roost structure within or immediately adjacent to the project site, such that similar structure shape and thermal properties are met with the replacement roost.
- e) If no active roosts are identified, then work may commence as planned. Survey results are valid for 30 days from the survey date. Should work commence later than 30 days from the survey date, surveys should be repeated. No preconstruction bat surveys are required for work conducted between the hibernation season and maternity season (i.e., September 1 through October 31).

MM-BIO-5: Disturbance to Bumble Bee Species. If required pursuant to pre-construction surveys, a qualified biologist paid for and hired by the applicant shall conduct a take avoidance survey for active special-status bumble bee colony nesting sites in any previously undisturbed area no more than 14 days prior to each phase of construction, if the work will occur during the flying season, generally between March 1 and September 1.

The surveys shall occur when temperatures are above 60 degrees Fahrenheit (°F), on sunny days with wind speeds below 8 miles per hour, and at least 2 hours after sunrise and 3 hours before sunset. Surveyors shall conduct transect surveys focusing on detection of foraging bumble bees and underground nests using visual

aids such as binoculars. If no bumble bees or potential bumble bees are detected, no further mitigation is required. If potential bumble bee species are seen but cannot be identified, the applicant shall obtain authorization from CDFW within 14 days prior to groundbreaking to use nonlethal netting methods to capture bumble bees so as to identify them as to species. If protected bumble bee nests are found, they shall be protected in place until they are no longer active as determined by a licensed entomologist. Survey results, including negative findings, shall be submitted to CDFW and the Town prior to groundbreaking within 14 days of completing the take avoidance survey.

MM-BIO-6: Disturbance to Foothill Yellow-Legged Frog (FYLF) and California Red-Legged Frog (CRLF). If it is established via biotic report that either species is likely to occur on the site, in order to minimize disturbance to dispersing or foraging FYLF and CRLF, all grading activity within 100 feet of aquatic habitat shall be conducted during the dry season, generally between May 1 and October 15, or before the onset of the rainy season,⁸ whichever occurs first, unless exclusion fencing is utilized. Construction that commences in the dry season may continue into the rainy season if exclusion fencing is placed between the construction site and creeks or other water features, and includes drainage features to keep the frog from entering the construction area. Additionally, the following measures shall be implemented to lessen impacts to FYLF and CRLF:

- a) Prior to building permit issuance the applicant shall submit evidence to the building department to demonstrate that they have retained a qualified biologist to implement each of the following measures.
- b) Prior to the start of construction, pre-construction surveys for FYLF and CRLF shall be conducted by a qualified biologist and shall cover the project site and aquatic features within 200 feet of the project site. Additionally, for construction activity within 100 feet of the San Francisquito Creek tributary system, a survey shall be conducted by a qualified biologist each day prior to the start of construction activities to ensure that no FYLF and CRLF are present in the construction area. If FYLF and CRLF are observed in the construction area or access areas, all work in the vicinity of the FYLF and CRLF shall be stopped and the USFWS shall be consulted immediately. The biologist shall submit a summary of their findings to the Town Planning Director prior to the start of construction.
- c) Exclusion fencing shall be installed around any work area within 100 feet of a drainage, wetland, or creek part of the San Francisquito Creek tributary system, unless construction activity will be completed in one day or less at that location. A qualified biologist shall be present to monitor the installation of the exclusion fence.

⁸ The rainy season includes periods when a ½-inch of rain or more is predicted within a 24-hour period and is generally between October and April.

- d) Because dusk and dawn are often the times when FYLF and CRLF are most actively foraging, all construction activities shall cease one half hour before sunset and shall not begin prior to one half hour after sunrise. Construction activities shall not occur during rain events, as FYLF and CRLF are most likely to disperse during periods of precipitation, unless a survey is conducted by a qualified biologist each day prior to the start of construction activities and one-half hour before sunset to ensure that no FYLF and CRLF are observed in the construction area or access areas.
- e) Any open holes or trenches shall be covered at the end of each working day to prevent FYLF and CRLF from becoming entrapped.
- f) A Spill Prevention and Control Plan shall be created and made part of the plans for the building permit application. The plan and materials necessary to implement it shall be accessible on-site. Heavy equipment shall be checked daily for leaks. Equipment with leaks shall not be used until leaks are fixed. Refueling shall occur at designated sites outside of active stream channels or above the ordinary high-water mark.
- g) Any disturbed ground shall receive appropriate erosion control treatment and native seed mix within seven days following completion of construction or within seven days following a seasonal stoppage of construction.
- h) All workers shall ensure that food scraps, paper wrappers, food containers, cans, bottles, and other trash from the construction area are deposited in covered or closed trash containers. The trash containers shall not be left open and unattended overnight.

MM-BIO-7: Disturbance to San Francisco Garter Snake. If it is established via biotic report that the species is likely to occur on the site, in order to minimize disturbance to the San Francisco Garter Snake, all grading activity within 100 feet of aquatic habitat shall be conducted during the dry season (May 1 through October 15). In addition, a qualified biologist paid for and hired by the applicant shall conduct presence/absence surveys for the San Francisco garter snake prior to construction in or adjacent to riparian areas, grasslands near ponds/wetlands, or other sensitive habitat. Any individuals identified shall be treated in consultation with USFWS. Additionally, the biologist shall supervise the installation of exclusion fencing along the boundaries of the work area, shall conduct environmental awareness training for construction workers, and shall be present during initial vegetation clearing and ground-disturbing activities.

MM-BIO-8: Disturbance to California Giant Salamander. If required pursuant to pre-construction surveys, then immediately prior to ground disturbing activities, a qualified biologist paid for and hired by the applicant will conduct a clearance survey in suitable habitat within the project work area for California Giant Salamander. The project biologist may establish Wildlife Exclusion Fencing (WEF)

to keep the species from entering the work area. If the California Giant Salamander is observed during construction, measures will be taken to avoid the individual(s) and the species will be allowed to leave on its own volition or will be relocated outside of the work area by the project biologist. Clearance surveys will be conducted daily unless the project biologist determines that the surveys are no longer necessary.

MM-BIO-9: Disturbance to Edgewood Park Micro-blind Harvestman. If required pursuant to pre-construction surveys, all construction activity shall be restricted from December through April to avoid work when the harvestman species are active. Potential impacts on serpentine grassland habitats shall also be mitigated pursuant to the requirements of MM-BIO-4 above.

MM-BIO-10: Disturbance to Santa Cruz Kangaroo Rat and San Francisco Dusky-Footed Woodrat. If it is established via biotic report that either species is likely to occur on the site, a qualified biologist paid for and hired by the applicant will conduct a preconstruction survey for Santa Cruz Kangaroo Rat and San Francisco dusky-footed woodrat nests within 30 days of the start of work activities. If active nests are determined to be present in, or within 10 feet of, the impact areas, the following measures will be implemented, as appropriate.

- a) Active nests that are detected within the work areas will be avoided to the extent feasible. Ideally, a minimum 10-foot buffer will be maintained between project activities and nests to avoid disturbance. In some situations, a smaller buffer may be allowed if, in the opinion of a qualified biologist, nest relocation would represent a greater disturbance to the woodrats than the adjacent work activities.
- b) If avoidance of active nests within and immediately adjacent to (within 10 feet of) the work areas is not feasible, then nest materials will be relocated to suitable habitat as close to the project area as possible (ideally, within or immediately adjacent to the project site).
 - a. Prior to the start of construction activities, a qualified biologist will disturb the nest to the degree that all kangaroo rats or woodrats leave the nest and seek refuge outside of the construction area. Relocation efforts will avoid the peak nesting season (February–July) to the maximum extent feasible. Disturbance of the nest will be initiated no earlier than one hour before dusk to prevent the exposure of kangaroo rats and woodrats to diurnal predators. Subsequently, the biologist will dismantle and relocate the nest material by hand. During the deconstruction process, the biologist will attempt to assess if there are juveniles in the nest. If immobile juveniles are observed, the deconstruction process will be discontinued until a time when the biologist believes the juveniles will be capable of independent survival

(typically after 2 to 3 weeks). A no-disturbance buffer will be established around the nest until the juveniles are mobile. The nest may be dismantled once the biologist has determined that adverse impacts on the juveniles would not occur.

Significance after mitigation: Less than significant

Impact 3.3-2 Implementation of 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 Game or U.S. Fish and Wildlife Service. (Less than Significant)

As noted above in the Environmental Setting, the Planning Area includes riparian habitat located along banks of streams and creeks, which is considered a sensitive natural community and habitat for sensitive wildlife species located throughout the Planning Area. Implementation of the Proposed Project could have a significant impact on riparian habitat or other sensitive natural communities if future development under the Proposed Project results in the removal or degradation of the habitat.

As discussed under Impact 3.3-1, buildout of the Proposed Project would involve construction of small-scale residential projects on vacant and underutilized properties with residential zoning, as well as higher density housing at 773 Cañada Road, Raymundo Drive at Runnymede Road, High Road at Woodside Road, and Cañada College. Areas with sensitive natural communities, such as riparian/wetlands and USFWS-designated critical habitat, are located in the western part of the Planning Area. Implementation of the Proposed Project would result in single-family residential development in these areas, which could potentially result in degradation or removal of any riparian or other sensitive habitat identified within the Planning Area.

However, the Town of Woodside General Plan and Municipal Code include policies and regulations that would minimize or avoid adverse effects from development that is adjacent to riparian areas and sensitive natural communities. The Conservation Element includes policies that would preserve, protect, and enhance the natural features, resources, and wildlife of the Planning Area. Policy CV1.2 of Conservation Element protects riparian corridors and water quality, and includes strategies to enforce riparian setbacks to maintain and buffer the riparian corridor in the review of projects. Moreover, Woodside Municipal Code Section 153.440 Stream Corridor Protection standards requires protection of fish, riparian vegetation, and wildlife habitat and retention of major stream corridors in their natural state. The Municipal Code defines a stream corridor as a horizontal distance of 50 feet, measured from each side of the center line of the stream, or a horizontal distance of 25 feet, measured from the top of the stream or creek bank, whichever is greater.

Therefore, with implementation of these policies and adherence to local regulations, as discussed above, the impacts of future development under the Proposed Project on riparian habitat or sensitive natural communities would be less than significant.

Mitigation Measures

None.

Impact 3.3-3 Implementation of the Proposed Project would not have a substantial adverse effect on federally protected wetlands, as defined by Section 404 of the Clean Water Act (including, but not limited to, marshes, vernal pools, coastal areas, etc.) through direct removal, filling, hydrological interruption, or other means. (Less than Significant)

As described in the Environmental Setting, the USFWS National Wetlands Inventory (2021) listed riverine (other water) features within the Planning Area. The Planning Area features a number of small creeks, swamps, and gulches that flow directly or indirectly to Searsville Lake within the San Francisquito Creek Watershed. These features support (or have the potential to support) seasonal wetland vegetation within their beds and riparian vegetation along their banks and are considered federally protected, as defined by Section 404 of the Clean Water Act. Implementation of the Proposed Project could have a significant impact on federally protected wetlands if future development under the Proposed Project results in the direct removal, filling, hydrological interruption, or otherwise degradation of the habitat.

Future development under the Proposed Project would be subject to the permitting requirements of the programs under Clean Water Act Section 404 and 401, which would assess projects and determine if impacts to wetlands, streams, and aquatic resources would be minimized. Future development would also be subject to the CDFW Lake and Streambed Alteration Program, which would require any project that could substantially divert or obstruct the flow of, substantially change or use any material from, or deposit debris into a river, stream, or lake to agree to measures that would protect existing fish or wildlife resources.

Further, the Town of Woodside General Plan and Municipal Code includes policies and regulations that would minimize or avoid adverse effects from development that is adjacent to wetlands. The Conservation Element includes policies that would preserve, protect, and enhance the natural features, resources, and wildlife of the Planning Area. Policy CV1.1 of the Conservation Element includes a policy to plan development sensitively to preserve natural features and landscape, and includes a strategy where wetlands or a species of concern is identified, the Town shall require preparation of biotic reports and pre-construction surveys by a professional biological consultant in order to identify and mitigate potential impacts.

With implementation of these policies and adherence to local regulations, as discussed above, impacts of future development under the Proposed Project would be less than significant in regard to direct removal, filling, hydrological interruption, or other means of degradation of wetland habitat.

Mitigation Measures

None.

Impact 3.3-4 Implementation of 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. (Less than Significant)

The Planning Area is located in areas with habitat connectivity, as indicated by CDFW's Biogeographic Information and Observations System (BIOS) Habitat Connectivity Viewer. The western part near Teague Hill Open Space Preserve and southwestern part near Sky Londa of the Planning Area are where the highest ranked connectivity (Irreplaceable and Essential) is located. The southeastern part of the Planning Area near Searsville Lake and border of Portola Valley is considered as Conservation Planning Linkages and Connections with Implementation Flexibility. Otherwise, the central and northeastern part of the Planning Area have limited connectivity opportunity and therefore are not areas within a regional wildlife movement corridor. This portion of the Planning Area encompasses development at Cañada College and High Road. Housing sites identified in the Proposed Project are located in areas of habitat connectivity, particularly in the southwestern and southeastern portions of the town, which includes development of single-family homes and accessory dwelling units, as shown on Figure 3.3-3. Because proposed housing sites are located in areas with habitat connectivity, construction could potentially adversely affect wildlife movement corridors or nursery sites and has the potential to interfere with the movement of native resident migratory fish or wildlife species.

Additionally, tributaries of San Francisquito Creek and freshwater marsh near Searsville Lake may serve as movement corridors for aquatic and riparian species. However, future development of the Proposed Project is not proposed in water courses that serve as movement corridors for fish and aquatic species. Therefore, the Proposed Project would have no direct impact on aquatic and riparian species.

As discussed under Impact 3.3-3, future development under the Proposed Project would be subject to the permitting requirements of the programs under Clean Water Act Section 404 and 401, which would assess projects so as to minimize impacts to wetlands, streams, and aquatic resources. Future development would also be subject to the CDFW Lake and Streambed Alteration Program, which would require any project that could substantially divert or obstruct the flow of, substantially change or use any material from, or deposit debris into a river, stream, or lake to agree to measures that would protect existing fish or wildlife resources, including movement corridors. Further, General Plan and Municipal Code policies and regulations would prevent impacts to fish movement corridors, as discussed below.

The Town of Woodside General Plan and Municipal Code includes policies and regulations that would minimize or avoid adverse effects from development to the movement and corridors of migratory fish and wildlife species. The Conservation Element includes policies that would preserve, protect, and enhance the natural features, resources, and wildlife of the Planning Area. Policy CV1.2 of the Conservation Element includes a policy that would protect riparian corridors and water quality, which details strategies to enforce riparian setbacks to maintain and buffer the riparian corridor in the review of projects. Similarly, the Open Space Element includes policies that would conserve, project, and enhance the open space system by conserving wildlife habitat and other areas of major or unique ecological significance. The Open Space Element includes a strategy

under Policy OS1.1 that conserves wildlife corridors by ensuring proposed developments have fencing that is wildlife friendly and does not impact or impede wildlife corridors. Additionally, Policy OS1.2 would enhance connectivity between open space areas by identifying opportunities to connect wildlife corridors and open space when reviewing new development applications. Lastly, Woodside Municipal Code Section 153.440 Stream Corridor Protection standards outline the need for protection of fish, riparian vegetation, and wildlife habitat and retention of major stream corridors in their natural state.

With implementation of these policies and adherence to local regulations, as discussed above, impacts of future development under the Proposed Project would be less than significant in regard to wildlife movement corridors of native resident migratory fish or wildlife species.

Mitigation Measures

None.

3.4 Geology and Soils

This section describes the environmental and regulatory setting for geology and soils, including those related to geologic and seismic hazards and soil stability. It also describes impacts related to geology, soils, and seismicity that would result from implementation of the Proposed Project and mitigation for significant impacts where feasible and appropriate.

There were two responses to the Notice of Preparation (NOP) regarding topics covered in this section. Commenters had concerns about the High Road site's history of sliding. These comments are addressed in this section and incorporated into the following analysis.

Environmental Setting

PHYSICAL SETTING

Geology and Soils

Regional Geology

The Town of Woodside is located within the Coast Ranges Geomorphic Province, a relatively geologically young and seismically active region on the western margin of the North American plate.¹ The ranges and valley trend northwest, sub-parallel to the San Andreas fault. The Coast Ranges are composed of thick Mesozoic and Cenozoic sedimentary strata. The northern and southern ranges are separated by a depression containing the San Francisco Bay.

Planning Area Geology

The Planning Area is located in the seismically active San Francisco Bay Area.² The seismic setting in the region is dominated by stress associated with the collision between the Pacific tectonic plate and the North American tectonic plate. The San Andreas Fault system is the boundary between the two tectonic plates, which extends nearly 700 miles along a northwest trend from Mexico to

¹ California Geological Survey (CGS). 2002. California Geomorphic Provinces. (Note 36.)

Available; <https://www.conservation.ca.gov/cgs/Documents/Publications/CGS-Notes/CGS-Note-36.pdf>. Accessed: January 30, 2024.

² Ryan, H.F., Ross, S.L., Graymer, R.W. n.d.. Earthquakes, Faults, and Tectonics.

https://pubs.usgs.gov/circ/c1198/chapters/037-046_Earthquakes.pdf. Accessed: January 30, 2024.

offshore northern California and about 50 miles wide. The San Andreas Fault runs north to south through the Planning Area.

Topography

The northern portions of the Planning Area are characterized by low-lying elevation ranging from 200 to 600 feet.³ Woodside Hills and Woodside Heights lie on the eastern side of Highway 280 and the Planning Area, with elevations as low as 100 feet around the Menlo Country Club golf course and as high as 520 feet near the edge of the highway. There are steep increases in elevation where the Town boundaries extend into the Santa Cruz Mountains in the western, central, and southern portions of the Area. Elevations in the central and southern areas range from 500 to 1200 feet, with similar elevation ranges in the western areas containing Teague Hill Open Space Preserve. The westernmost and southernmost edges reach up to approximately 1,800 feet.

Soil Properties

Soil is generally defined as the unconsolidated mixture of mineral grains and organic material that mantles the land surfaces of the earth. The characteristics of soil reflect the five major influences on their development: topography, climate, biological activity, parent (source) material, and time. Table 3.4-1 and Figure 3.4-1 show the surface soil types in the Planning Area that have been mapped by the Natural Resources Conservation Service (NRCS). As shown in Table 3.4-1, Alambique-McGarvey complex and Francisquito-Urban land complex are the predominant soil units within the Planning Area.⁴ In addition, the predominant soils in the Planning Area are slightly to moderately expansive. Expansive soils can shrink and swell in response to the presence of water, causing foundation and wall cracks, heaving sidewalks, and flaws in paved areas. In addition, proximity to water features, such as the creeks running through the Planning Area, increases the potential for expansion. The most expansive soils underly the central and northwestern portion of the Planning Area, especially in the northern area between Highway 280 and the northwestern boundary. Generally, projects in areas with expansive soil may require special building foundations or grade preparation, such as the removal of expansive soils and replacement with engineered soils.

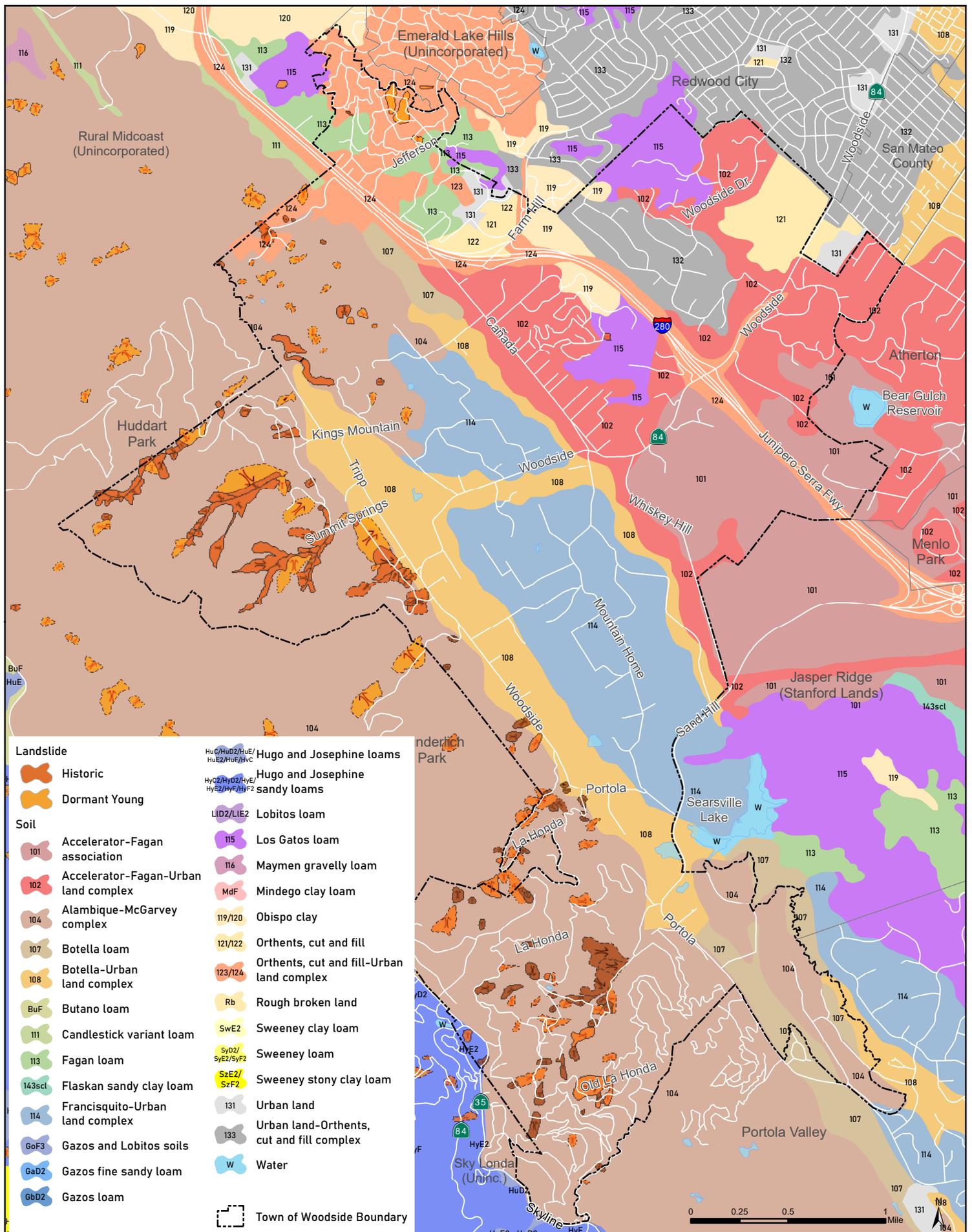
Seismicity

Regional Faults

Generally, earthquakes occur when tectonic plates of the Earth's crust collide or slide past one another along their boundaries or faults, and accumulated stress is released, resulting in seismic slippage. California is particularly susceptible to such plate movements, notably, the largely horizontal or "strike-slip" movement of the Pacific Plate as it impinges on and slides past the west margin of the North American Plate.

³ USGS, 2023. US Topo Maps. Available: <https://apps.nationalmap.gov/downloader/#/maps>. Accessed: January 30, 2024

⁴ USDA, 2019. Web Soil Survey. Available: <https://websoilsurvey.nrcs.usda.gov/app/>. Accessed: January 30, 2024



3.4-1 Soil Types and Erosion-Induced Landslide Hazard

Town of Woodside

Source: California Geological Survey, 2016; Gridded Soil Survey Geographic (gSSURGO) Database for 2023; Dyeft & Bhatia, 2024

Table 3.4-1: Soil Types in the Planning Area

Soil Unit	Slope Percentage	Approximate Percentage of the Planning Area	Portions of Planning Area
Alambique-McGarvey complex	30-75%	38.2%	Eastern and southern
Francisquito-Urban land complex	5-15%	12.8%	Central
Accelerator-Fagan-Urban land complex	5-15%	12.3%	Northwestern
Botella-Urban land complex	0-5%	11.2%	Central and southern
Orthents, cut and fill-Urban land complex	5-75%	6.3%	Northern
Accelerator-Fagan association	5-15%	5.9%	Western
Urban land-Orthents, cut and fill complex	0-5%	3.0%	Northwestern
Los Gatos loam	30-75%	2.8%	Northwestern
Botella loam	0-5%	2.1%	Northern
Orthents, cut and fill	0-15%	1.7%	Northern
Fagan loam	15-50%	1.3%	Northern
Obispo clay	5-15%	1.0%	Northern
Orthents, cut and fill	15-75%	0.6%	Northern
Urban land		0.3%	Northern
Orthents, cut and fill-Urban land complex	0-5%	0.2%	Northern

Sources: USDA Natural Resources Conservation Service, 2024.

The performance of man-made structures during a major seismic event varies widely due to a number of factors: location with respect to active fault traces or areas prone to liquefaction or seismic-induced landslides; the type of building construction (i.e., wood frame, unreinforced masonry, non-ductile concrete frame); the proximity and magnitude of the seismic event; and many other factors. In general, evidence from past earthquakes shows that wood frame structures tend to perform well, especially when their foundations are properly designed and anchored. Older, unreinforced masonry structures, on the other hand, do not perform as well, especially if they have not undergone appropriate seismic retrofitting. Applicable building code requirements include seismic requirements that are designed to ensure the satisfactory performance of building materials under seismic conditions.

The entire San Francisco Bay Area is located within the San Andreas fault system, a complex of active faults forming the boundary between the North American and Pacific lithospheric plates. Movement of the plates relative to one another results in the accumulation of strain along the faults, which is released during earthquakes. Numerous moderate to strong historic earthquakes have been generated in northern California by the San Andreas fault system. This level of active

seismicity results in a relatively high seismic risk in the San Francisco Bay Area. The San Andreas fault system includes numerous faults found by the California Geological Survey (CGS) in the Bay Area considered under the Alquist-Priolo Earthquake Fault Zoning Act to be active (i.e., to have evidence of fault rupture in the past 11,000 years). Active regional faults include the San Andreas, Hayward, Calaveras, Concord-Green Valley, and Greenville faults. In addition to the known active faults, recent research on the structural geology and tectonics of the region indicates that there is another potential source of large-magnitude earthquakes in the region. A structural trend of folds and thrust faults has been mapped in the hills north of the Livermore Valley. The largest of these features is the Mount Diablo anticline. Recent research has interpreted this feature to be a large fold developed above a blind (i.e., buried) thrust fault. The accumulation of strain on the blind Mount Diablo Thrust fault presents the potential for an earthquake along this fault.

The U.S. Geological Survey's (USGS) Working Group on California Earthquake Probabilities estimates that there is a 72 percent chance that a 6.7 or greater magnitude earthquake will occur in the San Francisco Bay Area between 2014 and 2043.⁵ The probability of a 6.7 magnitude or greater earthquake occurring along individual faults was estimated to be 22 percent along the San Andreas Fault, 33 percent along the Hayward-Rodgers Creek Fault,⁶ and 26 percent along the Calaveras Fault. The San Andreas Alquist-Priolo fault zones run through central Woodside.⁷ In addition, active faults have been identified within 25 miles of the Planning Area, including the Hayward, San Gregorio, and Calaveras faults.⁸

Planning Area-Specific Seismicity

A complex interaction of tectonic forces, geologic materials, soils, topography, and groundwater conditions affect the nature of seismic hazards at any site. Figure 3.6-2 shows the seismic hazards within the Planning Area. The San Andreas fault zone, the Alquist-Priolo designated zone which surrounds the fault trace, is located in the Planning Area and has been responsible for several historic earthquakes in northern California.

⁵ Field, E.H., Biasi, G.P., Bird, P., Dawson, T.E., Felzer, K.R. Jackson, D.D., Johnson, K.M., Jordan, T.H., Madden, C. Michael, A.J., Milner, K.R., Page, M.T., Parsons, T., Powers, P.M., Shaw, B.E., Thatcher, W.R., Weldon, R.J. II, and Zeng, Y. 2015. Long-term, time-dependent probabilities for the third uniform California earthquake rupture forecast (UCERF3). *Bulletin of the Seismological Society of America*. Available: <https://pubs.er.usgs.gov/publication/70147094>. Accessed: January 31, 2024.

⁶ The Hayward and Rodgers Creek faults are connected at the surface beneath San Pablo Bay, and the connection has significant implications for earthquake dynamics; therefore, modeling refers to the connected faults as the "Hayward-Rodgers Creek Fault."

⁷ California Geological Survey (CGS). 2021. Earthquake Zones of Required Investigation (website). Available online at: <https://maps.conservation.ca.gov/cgs/EQZApp/app/>. Accessed: January 31, 2024.

⁸ U.S. Geological Survey (USGS). The San Andreas and Other Bay Area Faults. Available: <https://earthquake.usgs.gov/earthquakes/events/1906calif/virtualltour/bayarea.php#:~:text=The%20San%20Andreas%20Fault%20and,Creek%2C%20and%20San%20Gregorio%20Faults>. Accessed: January 31, 2024.

The two largest recorded earthquakes on the San Andreas fault occurred in 1857 and 1906.⁹ The San Francisco earthquake had an estimated moment magnitude of 7.7 and was felt as far away as Oregon and central Nevada. Surface offsets occurred across approximately 250 miles, with the epicenter estimated to be offshore of the San Francisco coastline near the Golden Gate Bridge. Extensive damage in San Francisco and the East Bay and over 700 deaths resulted from the 1906 quake. The largest surface displacement on the fault line occurred in 1940, where an earthquake caused 17 feet of right-lateral strike-slip. The Loma Prieta earthquake was the most recent larger earthquake to occur on or near the San Andreas Fault, approximately 90 miles from the Planning Area with a 6.9 magnitude.¹⁰ Extensive damage occurred on the Bay Bridge as well as in downtown Santa Cruz and the Marina District of San Francisco.

After the San Andreas fault, the next nearest Alquist-Priolo hazard zones are associated with the Rodgers Creek and Hayward faults, approximately 17 miles from the Planning Area, and capable of magnitude 7.0 to 7.3 earthquakes. The largest earthquake on the Hayward fault occurred in 1868 with an epicenter south of San José, California.¹¹

Seismic and Geological Hazards

Seismic Shaking

Seismic ground shaking is a general term referring to all aspects of motion of the earth's surface resulting from an earthquake. Ground shaking is normally the major cause of damage in seismic events. The extent of ground shaking is determined by the magnitude and intensity of the earthquake, distance from the rupture, and local geologic conditions. Intensity is a subjective measure of the perceptible effects of seismic energy at a given point and varies with distance from the epicenter and local geologic conditions. The Modified Mercalli Intensity Scale (MMI) is the most used scale for measurement of the subjective effects of earthquake intensity. Earthquake size is generally quantitatively measured in terms of magnitude on the Richter scale or by moment magnitude. The USGS projects a 72 percent probability of a magnitude 6.7 or greater earthquake occurring somewhere in the San Francisco Bay Area by 2043, with 22 percent probability of a 6.7 or greater earthquake on the San Andreas fault system, 33 percent on the Hayward-Rodgers Creek faults, 26 percent on the Calaveras fault, and 6 percent on the San Gregorio fault.¹²

Surface Fault Rupture

Surface fault rupture occurs when the ground surface is broken due to fault movement during an earthquake. The location of surface fault rupture can be assumed to be along an active or potentially

⁹ U.S. Geological Survey (USGS). 2016. The San Andreas Fault. Available: <https://pubs.usgs.gov/gip/earthq3/safaultgip.html>. Accessed: February 1, 2024.

¹⁰ California Department of Conservation. n.d. Available: <https://www.conservation.ca.gov/cgs/earthquakes/loma-prieta>. Accessed: February 1, 2024.

¹¹ U.S. Geological Survey (USGS). 2018. The Hayward Fault—Is It Due for a Repeat of the Powerful 1868 Earthquake? August. (FS 2008-3019.) Available: <https://www.usgs.gov/news/featured-story/hayward-fault-it-due-a-repeat-powerful-1868-earthquake>. Accessed: February 1, 2024.

¹² U.S. Geological Survey (USGS). August, 2016. Earthquake Outlook for the San Francisco Bay Region 2014-2043. Available: <https://pubs.usgs.gov/fs/2016/3020/fs20163020.pdf>. Accessed: February 1, 2024.

active fault trace. Because the San Andreas fault zone is within the Planning Area and the San Andreas fault has a history of both surface fault rupture in the 1857, 1906, and 1989 earthquakes, there is a risk of surface fault rupture.¹³

Liquefaction

Liquefaction is the temporary transformation of loose, saturated, granular sediments from a solid state to a liquefied state as a result of seismic ground shaking. In the process, the soil undergoes a temporary loss of strength, which can cause ground displacement or ground failure. Since saturated soils are a necessary condition for liquefaction, soil layers in areas where the groundwater table is near the surface have higher liquefaction potential than those in which the water table is located at greater depths. Figure 3.4-2 indicates that the Planning Area includes large areas of high liquefaction susceptibility mainly encircling the pathways of multiple creeks. These areas also mainly follow the Alquist-Priolo zone for the San Andreas fault that runs north-south through the Planning Area. Another smaller low to moderate liquefaction zone extends from the Town's center into the western edge of the Planning Area.

Lateral Spreading

Lateral spreading refers to a type of landslide that forms on gentle slopes and has rapid fluid-like movement. Factors determining the potential for liquefaction and lateral spreading are soil type, the level and duration of seismic ground motions, the type and consistency of soils, and the depth to groundwater. Locations within the Planning Area that have high liquefaction susceptibility, as shown on Figure 3.6-2, have the highest risk of lateral spreading if they occur adjacent to an open face or slope. These would include areas on the eastern edge of the Planning Area that fall at the edge of the Santa Cruz Mountains.

Landslides

The strong ground motions that occur during earthquakes are capable of inducing landslides, generally where unstable slope conditions already exist. A landslide is the downhill movement of masses of earth material under the force of gravity. The primary factors influencing the stability of a slope include the nature of the underlying soil or bedrock, the geometry of the slope (height and steepness), rainfall, and the presence of previous landslide deposits. Two types of landslides are near the Planning Area: seismically induced landslide and precipitation- or water-induced landslide (see Figure 3.6-1). Landslide risk occurs mainly in the steep hills at the northern and western edges of the Planning Area boundary. Rain-induced sliding is known to occur at the High Road site.

Soil Erosion

Soil erosion is the process by which soil materials are worn away and transported to another area, either by wind or water. Not accounting for slope and groundcover factors, soils high in clay have low susceptibility to erosion because they are resistant to detachment. Coarse textured soils, such as sandy soils, also have low erosion potential despite their easy detachment, because of low runoff. Medium textured soils, such as the silt loam soils, are moderately susceptible to erosion, while soils

¹³ Ibid.

with a high silt content are the most susceptible.¹⁴ The soils in the Planning Area with the highest susceptibility to water erosion are the Botella-Urban land complex and Los Gatos loam, soil types that exist primarily in the northern and northeastern portions of the Town in slightly higher elevation areas. Soils in the Botella and Los Gatos series contain well-drained fine loam, with some more gravelly loam in Los Gatos soils. These soils occur on moderately steep hillsides in the Planning Area, compounding erosion risk.

Expansive Soils

Expansive soils have shrink-swell capacity, meaning they may swell when wetted and shrink when dried. Expansive soils can be hazardous to built structures, and may cause cracks in building foundations, distortion of structural elements, and warping of doors and windows. The higher the clay content of a soil, the higher its shrink-swell potential. The U.S. Department of Agriculture National Resource Conservation Service (NRCS) analyzes the shrink-swell potential of each soil type based on its linear extensibility and clay content and categorizes it as “low,” “moderate,” “high,” or “very high.” Where the shrink-swell classification is moderate to very high, shrinking and swelling can cause damage to buildings, utilities, roads, and other structures and the gradual cracking, settling, and weakening of older buildings could create potential safety concerns and financial loss. As shown in Figure 3.6-1 and described in Table 3.6-1, soils in a portion of the Planning Area in the northern and northeastern part of town, such as the High Road site, are underlain with the Accelerator-Fagan-Urban land complex, Fagan loam, and Obispo clay which are a clay loam that is moderately expansive.¹⁵

Subsidence

Subsidence occurs when a large portion of land is displaced vertically. This typically is due to the withdrawal of groundwater, oil, or natural gas. While subsidence is a significant concern in other parts of the state, particularly the San Joaquin Valley and Central Valley, San Mateo County experiences slight risk of subsidence but only near low-lying areas around the Bay shoreline which could exacerbate the degree of sea level rise.¹⁶ The USGS California Water Science Center maps of historical and current recorded subsidence does not identify the Town of Woodside as an area that has experienced subsidence.¹⁷ Because of its inland location between higher elevation areas, land subsidence is not likely to increase the impact of sea level rise in the Town of Woodside.¹⁸

¹⁴ Institute of Water Research (IWR). 2002. K Factor. Available: <http://www.iwr.msu.edu/rusle/kfactor.htm> Accessed: February 1, 2024.

¹⁵ United States Department of Agriculture. July, 2019. Natural Resources Conservation Service Web Soil Survey. Available: <https://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm>. Accessed: February 2, 2024.

¹⁶ County of San Mateo. March, 2018. Sea Level Rise Vulnerability Assessment. Available: https://www.smcsustainability.org/wp-content/uploads/2018-03-12_SLR_VA_Report_2.2018_WEB_FINAL.pdf. Accessed: February 2, 2024.

¹⁷ U.S. Geological Survey (USGS). N.d. Areas of Land Subsidence in California. Available: https://ca.water.usgs.gov/land_subsidence/california-subsidence-areas.html. Accessed: February 2, 2024.

¹⁸ KQED. April 22, 2021. Maps: See Which Bay Area Locations are at Risk from Rising Seas. Available: <https://www.kqed.org/science/1973624/maps-see-which-bay-area-locations-are-at-risk-from-rising-seas>. Accessed: February 2, 2024.

Paleontological Resources

Paleontological resources are the fossil remains or traces of past life forms, including vertebrate and invertebrate species as well as plants. Paleontological resources are considered *significant* if they are identifiable vertebrate fossils; uncommon invertebrate, plant, and trace fossils; or other data that provide information important to the scientific record. Paleontological resources are older than the middle Holocene (i.e., older than approximately 5,000 years).

The Town is located in San Mateo County just inland of Redwood City, which forms part of the northern portion of the Coast Ranges Geomorphic Province of California.¹⁹ The Planning Area is bounded by the Pacific Ocean to the west and the Great Valley Geomorphic Province to the east. The Coast Ranges are composed of thick Mesozoic and Cenozoic sedimentary strata. The northern Coast Ranges are dominated by irregular, knobby, landslide-topography of the Franciscan Complex. West of the San Andreas Fault is the Salinian Block, a granitic core extending from the southern extremity of the Coast Ranges to the north of the Farallon Islands.²⁰ According to a specimen search of the U.C. Berkeley Museum of Paleontology records, Pleistocene-age deposits in San Mateo County have yielded numerous fossils, including *Pinnipedia* (Seals), *Bison* (genus of Bison), *carcharodon carcharias* (Great White Shark), and *Mysticeti* (Baleen Whales) from the Miocene and Pleistocene-age alluvium near Pomponio Beach and El Granada Beach, which is about 20 miles north of the Planning Area. However, a search of the fossil database maintained by the U.C. Berkeley Museum of Paleontology did not identify any fossils within Woodside.²¹

REGULATORY SETTING

Federal Regulations

Earthquake Hazards Reduction Act of 1977

Federal laws codified in United States Code Title 42, Chapter 86, were enacted to reduce risks to life and property from earthquakes in the United States through the establishment and maintenance of an effective earthquake hazards reduction program. Implementation of these requirements are regulated, monitored, and enforced at the State and local levels. Key regulations and standards applicable to the Proposed Project are summarized below.

U.S. Geological Survey Landslide Hazard Program

The USGS created the Landslide Hazard Program in the mid-1970s; the primary objective of the program is to reduce long-term losses from landslide hazards by improving our understanding of the causes of ground failure and suggesting mitigation strategies. The federal government takes the

¹⁹ CGS. 2002.

²⁰ Ibid.

²¹ University of California Museum of Paleontology. 2020. *Advanced Specimen Search, San Mateo County*. Available: <https://ucmpdb.berkeley.edu/>. Accessed: February 2, 2024.

lead role in funding and conducting this research, whereas the reduction of losses due to geologic hazards is primarily a state and local responsibility.

Disaster Mitigation Act of 2000

The Disaster Mitigation Act of 2000 (DMA2K) (Public Law 106-390) amended the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1988 to establish a Pre-Disaster Mitigation (PDM) program and new requirements for the federal post-disaster Hazard Mitigation Grant Program (HMGP). DMA2K encourages and rewards local and state pre-disaster planning. It promotes sustainability and seeks to integrate state and local planning with an overall goal of strengthening statewide hazard mitigation. This enhanced planning approach enables local, tribal, and state governments to identify specific strategies for reducing probable impacts of natural hazards such as floods, fire, and earthquakes. In order to be eligible for hazard mitigation funding after November 1, 2004, local governments are required to develop a Hazard Mitigation Plan (HMP) that incorporates specific program elements of the DMA2K law. The Town of Woodside participated in the San Mateo County Multi-Jurisdiction Local Hazard Mitigation Plan (LHMP), as described under Local Regulations, below.

State Regulations

California Multi-Hazard Mitigation Plan

The State of California Multi-Hazard Mitigation Plan, also known as the State Hazard Mitigation Plan (SHMP), was approved by FEMA in 2018.²² The SHMP outlines present and planned activities to address natural hazards. The adoption of the SHMP qualifies the State of California for federal funds in the event of a disaster. The State is required under the Disaster Mitigation Act of 2000, described above, to review and update its SHMP and resubmit for FEMA approval at least once every 5 years to ensure the continued eligibility for federal funding. The SHMP provides goals and strategies which address minimization of risks associated with natural hazards and response to disaster situations. The SHMP notes that the primary sources of losses in the state of California are fire and flooding; and while earthquakes occur less frequently, they account for the greatest combined losses.

California Building Standards Code

The California Building Code (CBC) is Part 2 of Title 24 of the California Code of Regulations. The CBC incorporates the International Building Code, a model building code adopted across the United States. The CBC is updated every three years, and the current 2022 version took effect July 1, 2022. Except for certain additions, deletions, and amendments, the Town adopted the 2022 CBC by reference pursuant to Title 15, Section Sec. 150.01 of the Town of Woodside Municipal Code. Through the CBC, the State provides a minimum standard for building design and construction. Of particular relevance, Chapter 16 of the CBC contains specific requirements for structural (building) design, including seismic loads. Chapter 18 of the CBC includes requirements for soil testing, excavation and grading, and foundation design. The 2022 CBC (based on the 2021

²² CalOES. 2018. California State Hazard Mitigation Plan. Available: https://www.caloes.ca.gov/wp-content/uploads/002-2018-SHMP_FINAL_ENTIRE-PLAN.pdf. Accessed February 2, 2024

International Building Code) has been amended and adopted as the Building Code of the Town of Woodside, regulating the erection, installation, alteration, repair, relocation replacement, addition to, use or maintenance of buildings within the Town.

California Alquist–Priolo Earthquake Fault Zoning Act

The Alquist–Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazard of surface faulting to structures used for human occupancy. The main purpose of the law is to prevent the construction of buildings used for human occupancy on top of active faults. The law only addresses the hazard of surface fault rupture and is not directed toward other earthquake hazards, such as ground shaking or landslides.

The law requires the State Geologist to establish regulatory zones (known as Earthquake Fault Zones or Alquist–Priolo Zones) around the surface traces of active faults, and to issue appropriate maps. The maps are then distributed to all affected cities, counties and state agencies for their use in planning and controlling new or renewed construction. Generally, construction within 50 feet of an active fault zone is prohibited. The San Andreas Fault, zoned under the Alquist–Priolo Earthquake Fault Zoning Act, runs north-south through the Planning Area.

Seismic Hazards Mapping Act, California Public Resources Code Sections 2690–2699.6

The Seismic Hazards Mapping Act was developed to protect the public from the effects of strong ground shaking, liquefaction, landslides, or other ground failure, and from other hazards caused by earthquakes. This act requires the State Geologist to delineate various seismic hazard zones and requires cities, counties, and other local permitting agencies to regulate certain development projects within these zones. Before a development permit is granted for a site within a Seismic Hazard Zone, a geotechnical investigation of the site must be conducted, and appropriate mitigation measures incorporated into the project design. Geotechnical investigations conducted within Seismic Hazard Zones must incorporate standards specified by the CGS Special Publication 117, Guidelines for Evaluating and Mitigating Seismic Hazards. There are Seismic Hazard Zones within the Planning Area, specifically Fault, Liquefaction, and Landslide Zones. These zones are displayed on Figure 3.6-1 and 3.6-2.

California Department of Transportation (Caltrans)

Jurisdiction of the California Department of Transportation (Caltrans) includes State and interstate routes within California. Any work within the right-of-way of a federal or State transportation corridor is subject to Caltrans regulations governing allowable actions and modifications to the right-of-way. Caltrans standards incorporate the CBC, and contain numerous rules and regulations to protect the public from seismic hazards such as surface fault rupture and ground shaking. In addition, Caltrans standards require that projects be constructed to minimize potential hazards associated with cut and fill operations, grading, slope instability, and expansive or corrosive soils, as described in the Caltrans Highway Design Manual (HDM).

Caltrans and local project sponsors, as part of the project development and delivery process, are obligated to conduct paleontological studies in response to federal, state, and local laws, regulations, and ordinances. For example, Section 305 of the Federal Aid Highway Act of 1956 (20 USC 78, 78a)

gives authority to use federal funds to salvage archaeological and paleontological sites affected by highway projects.

National Pollution Discharge Elimination System Permits

In California, the State Water Resources Control Board (SWRCB) and its Regional Water Quality Control Board (RWQCB) administer the National Pollution Discharge Elimination System (NPDES) program. The NPDES permit system was established as part of the Federal Clean Water Act to regulate both point source discharges and non-point source discharges to surface water of the United States, including the discharge of soils eroded from construction sites.

The NPDES program consists of characterizing receiving water quality, identifying harmful constituents (including siltation), targeting potential sources of pollutants (including excavation and grading operations), and implementing a comprehensive stormwater management program. Construction and industrial activities typically are regulated under statewide general permits that are issued by the SWRCB. Additionally, the SWRCB issues Water Discharge Requirements that also serve as NPDES permits under the authority delegated to the RWQCBs, under the Clean Water Act.

California Public Resources Code

Sections 5097–5097.6 of the California Public Resources Code outline the requirements for cultural resource analysis prior to the commencement of any construction project on state lands. The state agency proposing the project may conduct the cultural resource analysis or they may contract with the State Department of Parks and Recreation. In addition, this section stipulates that the unauthorized disturbance or removal of archaeological, historical, or paleontological resources located on public lands is a misdemeanor. It prohibits the knowing destruction of objects of antiquity without a permit (expressed permission) on public lands and provides for criminal sanctions. As used in this section, "public lands" means lands owned by, or under the jurisdiction of, the state, or any city, county, district, authority, or public corporation, or any agency thereof.

Local Regulations

Town of Woodside General Plan 2012 (General Plan)

The Town of Woodside General Plan 2012 (General Plan) includes the following goals and policies associated with geology, soils, and seismicity:

Goal NH1: Minimize risks posed by hazards

Policy NH1.2: Require assessment and mitigation of seismic hazards

Policy NH1.3 – Require assessment and mitigation of landslide hazards

Policy NH1.4 – Require assessment and mitigation of ground settlement risks

Policy NH1.5 – Require assessment and mitigation of soil liquefactions risks

Policy NH1.7 – Seek to minimize erosion and sedimentation

Policy NH1.8 – Require assessment and mitigation of expansive earth materials risks

Policy NH1.10 – Compile and maintain natural hazard data

Policy NH1.11 – Institute or participate in education related to natural hazards

Goal LU1: Preserve and enhance Woodside as a scenic, rural residential community

Policy LU1.5 – Thoroughly evaluate changes to parcel boundaries

Policy LU1.8 – Encourage, plan parks and recreation in keeping with the rural setting

Goal OS1: Conserve, protect, and enhance open space system

Policy OS1.4 – Preserve open space for the Protection of Public Health and Safety

Goal CV1: Maintain a healthy natural environment

Policy CV1.7 – Review regulations to implement conservation policies

Policy CV1.8 – Collect biological and geological data

Goal PU1: Ensure adequate, safe, and site sensitive utilities

Policy PU1.3 – Ensure continuity of utility services

Goal PU5: Encourage and support on-site sewage disposal systems

Policy PU5.4 – Promote education and outreach

San Mateo County Multi-Jurisdictional Local Hazard Mitigation Plan

In 2021, the Town took part in an updated multi-jurisdiction hazard mitigation plan to suit the local needs and capabilities of the County’s partners and participating jurisdictions: The *2021 Multijurisdictional Local Hazard Mitigation Plan*.²³ The Hazard Mitigation Plan identified sea-level rise, earthquakes and landslides as hazards of concern and further provides resources, information, and strategies for mitigating risks associated with these hazards.

Town of Woodside Town Code

Section 150.01 adopts the 2022 CBC in its entirety excepting certain modifications. As discussed above, the CBC regulates seismic design, the excavation of foundations and retaining walls, analysis

²³ County of San Mateo, 2021.

of slope instability, requirements for drainage and grading, and other aspects of building design and construction that relate to geology, soils, and seismicity.

Section 151.58 of the Town Code requires geotechnical reports for any grading on sites determined geologically hazardous. The report must contain information on geology, soils, surface storm waters, ground waters, and other information, and must be certified by the Town. A field review and final written report must also be reviewed and approved by the Town.

Chapter 152 of the Town Code provides regulations for lot mergers, lot line adjustments, land divisions, and subdivisions, with one of the intended purposes of protecting against excessive stormwater runoff, soil erosion, earth movement, and other geologic hazards by preserving the natural ground slopes and natural ground cover. Section 152.123 also includes a requirement for preparation of a geotechnical report for every land division or subdivision.

Section 153.420 as part of the Zoning Chapter 153 of the Town Code establishes detailed requirements, procedures, and regulations for evaluating and reviewing construction, site development, land divisions, and subdivisions to ensure geologic hazards are considered. These include considerations of special study seismic zones, earthquake fault setback zones, and other safeguards such as permits and reports to prevent hazards to property, the environment, public health, welfare, and safety. Section 150.124 defines seismic safety requirements, including that no building for human occupancy shall be constructed within 50 feet of a fault trace identified as a known fault trace, and no building for human occupancy shall be constructed within 125 feet of an inferred fault trace. Section 153.427 defines additional regulations for nonconforming structures and buildings in fault setback zones, which apply to structures and buildings for human occupancy.

Section 153.437 describes measures to protect significant trees in the Town during site development and construction, which includes adhering to measures to effect erosion control and soil and water retention.

Impact Analysis

SIGNIFICANCE CRITERIA

For the purposes of this EIR, a significant impact would occur if the Proposed Project would:

Criterion 1: 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 or based on other substantial evidence of a known fault (refer to Division of Mines and Geology Special Publication 42),**
- ii. Strong seismic ground shaking,**
- iii. Seismically related ground failure, including liquefaction, or**
- iv. Landslides;**

Criterion 2: Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse;

Based on the findings of the Initial Study circulated with the Notice of Preparation, it was determined that impacts related to the following criteria would be less than significant: substantial soil erosion or the loss of topsoil; expansive soils and soils incapable of adequately supporting the use of septic tanks or wastewater disposal systems; unique paleontological resource or sites. Accordingly, these criteria are not analyzed further here. The Initial Study is included in Appendix A.

METHODOLOGY AND ASSUMPTIONS

Geology, Soils, and Seismicity

This evaluation of geologic, soils, and seismic hazard conditions was completed using published geologic, soils, and seismic maps and studies from USGS, CGS, and ABAG. In order to reduce or mitigate potential hazards from earthquakes or other local geologic hazards, implementation of the Proposed Project would be governed by existing regulations at the federal, state, and local levels, including existing Town of Woodside 2012 General Plan (General Plan) policies and provisions. These regulations require that a proposed project design reduce potential adverse soils, geological, and seismicity effects to the extent feasible. Compliance with these regulations is required, not optional. These provisions ensure that development will continue to be completed in compliance with local and State regulations.

Paleontological Resources

The evaluation of impacts on paleontological resources was completed using published geologic maps from CGS (Wagner, Bortugno, & McJunkin, 1991) and database query at the University of California Museum of Paleontology (University of California Museum of Paleontology, 2020), following procedures outlined in the Standard Guidelines provided by the Impact Mitigation Guidelines Revisions Committee of the Society of Vertebrate Paleontology (SVP) (Society of Vertebrate Paleontology, 2010).^{24, 25, 26} The Standard Guidelines include procedures for the investigation, collection, preservation, and cataloguing of fossil-bearing sites, including the designation of paleontological sensitivity. The Standard Guidelines are widely accepted among paleontologists and are followed by most investigators. The Standard Guidelines identify the two key phases of paleontological resource protection as (1) assessment and (2) implementation. Assessment involves identifying the potential for a project site or area to contain significant nonrenewable paleontological resources that could be damaged or destroyed by project excavation

²⁴ Wagner, Bortugno, & McJunkin, 1991.

²⁵ University of California Museum of Paleontology, 2021.

²⁶ Society of Vertebrate Paleontology. 2010. *Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources*. Available: https://vertpaleo.org/wp-content/uploads/2021/01/SVP_Impact_Mitigation_Guidelines.pdf. Accessed: February 16, 2024.

or construction. Implementation involves formulating and applying measures to reduce such adverse effects.

For the assessment phase, the Standard Guidelines prescribe the following steps:²⁷

- Identify the geologic units that would be affected by the project, based on the project's depth of excavation—either at ground surface or below ground surface, defined as at least 5 feet below ground surface.
- Evaluate the potential of the identified geologic units to contain significant fossils (paleontological sensitivity).
- Identify impacts on paleontologically sensitive geologic units as a result of near-term and longer-term construction and operation that involve ground disturbance.
- Evaluate impact significance.

The paleontological sensitivity of the geologic units identified in the study area is classified according to four categories: High, Undetermined, Low, and No Potential.²⁸

- **High Potential.** Assigned to geologic units from which vertebrate or significant invertebrate, plant, or trace fossils have been recovered; and sedimentary rock units suitable for the preservation of fossils (“middle Holocene and older, fine-grained fluvial sandstones...fine-grained marine sandstones, etc.”). Paleontological potential consists of the potential for yielding abundant fossils, a few significant fossils, or “recovered evidence for new and significant taxonomic, phylogenetic, paleoecologic, taphonomic, biochronologic, or stratigraphic data.”
- **Undetermined Potential.** Assigned to geologic units “for which little information is available concerning their paleontological content, geologic age, and depositional environment.” In cases where no subsurface data already exist, paleontological potential can sometimes be assessed by subsurface site investigations.
- **Low Potential.** Field surveys or paleontological research may allow determination that a geologic unit has low potential for yielding significant fossils (e.g., basalt flows). Mitigation is generally not required to protect fossils.
- **No Potential.** Some geologic units have no potential to contain significant paleontological resources, such as high-grade metamorphic rocks (such as gneisses and schists) and plutonic igneous rocks (such as granites and diorites). Mitigation is not required.

Geologic units in the Planning Area were identified through California Geological Survey regional maps.²⁹ Determination of presence of paleontological resources in the units was based on the fossil record as documented by the University of California Museum of Paleontology.³⁰ For the implementation phase, the Standard Guidelines states that evaluation must identify impacts on

²⁷ Ibid.

²⁸ Ibid.

²⁹ Wagner, Bortugno, & McJunkin, 1991.

³⁰ University of California Museum of Paleontology, 2021.

significant paleontological resources and formulate and implement measures to mitigate potential impacts relative to the paleontological sensitivity of the geologic units that would be disturbed.³¹

For the purposes of this analysis, an impact on paleontological resources was considered significant and to require mitigation if it would result in any of the following:

- Damage to or destruction of vertebrate paleontological resources.
- Damage to or destruction of any paleontological resource that:
 - Provides important information about evolutionary trends, including the development of biological communities;
 - Demonstrates unusual circumstances in the history of life;
 - Represents a rare taxon or a rare or unique occurrence;
 - Is in short supply and in danger of being destroyed or depleted;
 - Has a special and particular quality, such as being the oldest of its type or the best available example of its type; or
 - Provides information used to correlate strata for which it may be difficult to obtain other types of age dates.

IMPACTS

Impact 3.4-1 Implementation of the Proposed Project would not expose residents, visitors and employees, as well as public and private structures, to substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault; strong seismic ground shaking; seismically related ground failure, including liquefaction; or landslides. (Less than Significant)

Fault Rupture and Ground Shaking

For the Proposed Project, a significant impact due to fault rupture could occur if new structures were constructed within a designated Alquist-Priolo Earthquake Fault Zone, or within an active or potentially active known fault such that substantial adverse impacts could result, including loss of life and property. As shown on Figure 3.4-2 and noted above, there are two Alquist-Priolo Earthquake Fault Zones that traverse Woodside along a north-south axis. The inactive Pilarcitos Fault also runs north-south in the southern portion of Woodside but is not within a designated Alquist-Priolo Zone. The Proposed Project would facilitate development within the Alquist-Priolo Zones, as shown on Figure 2-2. As such, there is a risk of loss, injury or death due to rupture of a known earthquake fault, which is a potentially significant impact.

All future development under the Proposed Project would be required to comply with the provisions of Woodside Municipal Code, including Section 150.01 – Building Code and Residential

³¹ Society of Vertebrate Paleontology, 2010.

Code, which incorporates the seismic design requirements of the California Building Codes (CBC). Further, Municipal Code Section 153.420 establishes additional detailed requirements and procedures for geologically hazardous areas to assure that geologic hazards are considered in development so that potential loss of life and property is minimized. These requirements include the establishment of special building setbacks lines along fault traces where no building for human occupancy shall be constructed within 50 feet of a fault trace and that no building for human occupancy shall be constructed within 125 feet of an inferred fault trace. The Code requires review of all applications in geologically hazardous areas by the Planning Director and the Town Engineer for planning and building permits to determine if provisions of Section 153.420 are complied with, including the identification of corrective measures recommended in site-specific geologic studies as required pursuant to the Code.

Compliance with existing regulations would ensure that risks are minimized to the extent practicable, and impacts related to fault rupture would be less than significant.

Liquefaction

A significant impact due to liquefaction could occur if implementation of the Proposed Project would result in construction in areas of elevated liquefaction risk with the risk of loss, injury, or death. As shown in Figure 3.4-2, the Planning Area includes areas of high and very high liquefaction susceptibility, principally located around creeks and watercourses. These areas also fall largely within the Alquist-Priolo Fault Zones. The Raymundo Drive multifamily housing site and several sites identified in the proposed Housing Element are located in areas of high liquefaction susceptibility. Natural Hazards and Safety Element Policy NH1.5 requires geotechnical and geologic studies for sites within the liquefaction zone on the State Seismic Hazards Zone map. Additionally, development pursuant to the Proposed Project would be required to comply with the provisions of the Town Code addressing liquefaction risk as applicable, including Section 150.01 – Building Code and Residential Code, which incorporates the seismic design requirements of the CBC. Further, prior to issuance of a building permit, Sec. 153.425 requires that Town staff review and confirm that the proposed development poses no geologic hazard to development and use in accordance with applicable laws, ordinances, and policies, or that corrective measures recommended by the applicant's soils engineer and geologist are sufficient to address identified risk. As such, compliance with existing General Plan policy and regulations would reduce potential impacts related to liquefaction to the maximum extent practicable. Therefore, impacts are considered less than significant.

Landslides

Landslides may occur on slopes of 15 percent or less; however, the probability is greater on steeper slopes that exhibit old landslide features such as steep slopes or banks, slanted vegetation, and transverse ridges. Landslide-susceptible areas are characterized by steep slopes and downslope creep of surface materials. As discussed above under the Environmental Setting, seismically induced landslides and precipitation-induced landslides can occur on much of the steep hills at the northern and western edges of the Planning Area boundary, as shown on Figure 3.4-1, particularly in wet weather months. Rain-induced sliding is known to occur at the High Road site. Much of the western part of the Planning Area - specifically, most of the area west of the north-south alignment of Tripp Road and Woodside Road - is located in an area of slope instability, as identified on Map

NH-1 of the General Plan. The Proposed Project would involve development of single-family housing and ADUs in this area, potentially exposing new residents and structures to risk in the event of landslide.

However, compliance with the Town's Municipal Code and General Plan would help reduce these potential landslide impacts. Natural Hazards and Safety Element Policy NH1.3 requires adequate geotechnical and geologic studies for sites identified on Map NH1, Town Geologic Hazard Zones, with the potential for slope instability and landslide hazards. Where the presence of landslide hazards is confirmed, appropriate design and construction techniques necessary to mitigate the probable effects of this hazard are required. Additionally, development on land identified as landslide on the Town Geologic Hazards Map is subject to the provisions of Municipal Code Section 153.420 Geologically Hazardous Areas, which requires site-specific measures recommended by the landowner or applicant's soils engineer and geologist be identified and implemented in order to mitigate the hazards. Such measures shall be approved by the Town Engineer and Town Geologist. As such, compliance with existing General Plan policy and regulations would reduce potential impacts related to landslides to the maximum extent practicable, and impacts related to landslides would be less than significant.

Mitigation Measures

None required.

Impact 3.4-2 Implementation of the Proposed Project would not locate structures on expansive soils or on a geologic unit or soil that is unstable, or that would become unstable as a result of new development under the Proposed Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse, or create substantial risks to life or property. (Less than Significant)

The Proposed Project would have a significant impact if related development were located on an unstable geologic unit or soil, or a geologic unit or soil that would become unstable as a result of such development, and potentially result in on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse. Liquefaction and landslide hazards associated with implementation of the Proposed Project are examined under Impact 3.4-1.

Overall, large areas of Woodside are underlain by the expansive soils of the Whiskey Hill Formation (formerly Butano Formation) and the Santa Clara Formation, both of which are known to have potentially expansive units (predominantly claystone). Soils and surficial deposits, including colluvium, alluvium, and landslide deposits, derived from these formations can also be potentially expansive. In addition, serpentinite, which underlies portions of the eastern hills, can weather to soils that are potentially expansive.

Development associated with the implementation of the Proposed Project could be located on a geologic unit or soils that are susceptible to lateral spreading. As discussed above under the Environmental Setting, the factors determining the potential for lateral spreading are liquefiable soils and the proximity to an open face or slope. Locations within the Planning Area that have high

liquefaction susceptibility, as shown on Figure 3.4-2, have the highest risk of lateral spreading if they occur adjacent to an open face or slope. Open faces, such as West Union Creek, travelling north to south, connecting to Bear Gulch Creek in central Woodside, as well as Alambique Creek, which connects to Searsville Lake in southern Woodside, pose some risk of lateral spreading, though it is not expected to be a great risk.

Development associated with the implementation of the Proposed Project could be located on soils that pose a low risk of subsidence. As discussed above under the Environmental Setting, the withdrawal of groundwater, oil, or natural gas can cause land to be displaced vertically. However, the USGS California Water Science Center maps of historical and current recorded subsidence does not identify the Town of Woodside as an area that has experienced subsidence.³² Therefore, subsidence is unlikely to result from construction created under the Proposed Project.

The potential risks related to construction on expansive or unstable soils from Proposed Project would be addressed through required compliance with the provisions of the California Building Code related to soils and foundations and related policies contained in the General Plan. Development under the Proposed Project would comply with Natural Hazards and Safety Element Policy NH1.8 that requires assessment and mitigation of expansive earth materials risks. This policy requires adequate geotechnical and geologic reports if Map NH1, Town Geologic Hazard Zones, indicates the potential of expansive soils. Where the presence of expansive soils is confirmed, appropriate geotechnical, structural, drainage and other measures necessary to mitigate the probable effects of this hazard should be employed.

Development in areas with expansive soils would be required to comply with State and local building codes. Chapter 18 of the CBC regulates the excavation of foundations and retaining walls. This chapter regulates the preparation of a preliminary soil report, engineering geologic report, geotechnical report, and supplemental ground-response report. Chapter 18 also regulates analysis of expansive soils and the determination of the depth to groundwater table. Appendix Chapter J of the CBC regulates grading activities, including drainage and erosion control and construction on unstable soils, such as expansive soils and areas subject to liquefaction. As such, compliance with existing regulations detailed above would ensure that any impact is reduced to a less than significant level.

Mitigation Measures

None required.

³² U.S. Geological Survey (USGS). N.d. Areas of Land Subsidence in California. Available: https://ca.water.usgs.gov/land_subsidence/california-subsidence-areas.html. Accessed: February 13, 2024.

3.5 Greenhouse Gas Emissions

This section describes the environmental and regulatory setting for greenhouse gas (GHG) emissions. It also describes impacts related to GHG emissions that would result from implementation of the Proposed Project and mitigation for significant impacts where feasible and appropriate.

There were no responses to the Notice of Preparation (NOP) directly related to topics covered in this section.

Environmental Setting

THE GREENHOUSE EFFECT AND GREENHOUSE GASES

The process known as the *greenhouse effect* keeps the atmosphere near Earth's surface warm enough for the successful habitation of humans and other life forms. The greenhouse effect is created by sunlight that passes through the atmosphere. Some of the sunlight striking Earth is absorbed and converted to heat, which warms the surface. The surface emits a portion of this heat as infrared radiation, some of which is re-emitted toward the surface by GHGs. Human activities that generate GHGs increase the amount of infrared radiation absorbed by the atmosphere, thus enhancing the greenhouse effect and amplifying the warming of Earth.

Increases in fossil fuel combustion and deforestation have exponentially increased concentrations of GHGs in the atmosphere since the Industrial Revolution.¹ Rising atmospheric concentrations of GHGs in excess of natural levels result in increasing global surface temperatures—a process commonly referred to as *global warming*. Higher global surface temperatures, in turn, result in changes to Earth's climate system, including increased ocean temperature and acidity, reduced sea ice, variable precipitation, and increased frequency and intensity of extreme weather events.² Large-scale changes to Earth's system are collectively referred to as *climate change*.

¹ Intergovernmental Panel on Climate Change. 2007. *Climate Change 2007: The Physical Science Basis*. Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change. Available: https://www.ipcc.ch/site/assets/uploads/2018/05/ar4_wg1_full_report-1.pdf. Accessed: August 16, 2021.

² Intergovernmental Panel on Climate Change. 2018. *Global Warming of 1.5°C. Contribution of Working Group I, II, and III (Summary for Policy Makers)*. Available: https://www.ipcc.ch/site/assets/uploads/sites/2/2019/05/SR15_SPM_version_report_LR.pdf. Accessed: August 16, 2021.

The Intergovernmental Panel on Climate Change (IPCC) was established by the World Meteorological Organization and United Nations Environment Programme to assess scientific, technical, and socioeconomic information relevant to the understanding of climate change, its potential impacts, and options for adaptation and mitigation. The IPCC estimates that human-induced warming reached approximately 1 degree Celsius (°C) above pre-industrial levels in 2017, increasing at 0.2°C per decade. Under the current nationally determined contributions of mitigation from each country until 2030, global warming is expected to rise to 3°C by 2100, with warming to continue afterward.³ Large increases in global temperatures could have substantial adverse effects on the natural and human environments worldwide and in California.

Greenhouse Gases

The principle anthropogenic (human-made) GHGs contributing to global warming are carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), and fluorinated compounds, including sulfur hexafluoride (SF₆), hydrofluorocarbons (HFCs), and perfluorocarbons. Water vapor, the most abundant GHG, is not included in this list because its natural concentrations and fluctuations far outweigh its anthropogenic sources.

The primary GHGs of concern associated with the project are CO₂, CH₄, and N₂O. Principal characteristics of these pollutants are discussed below.

- **Carbon dioxide** enters the atmosphere through fossil fuels (oil, natural gas, and coal) combustion, solid waste decomposition, plant and animal respiration, and chemical reactions (e.g., manufacture of cement). CO₂ is also removed from the atmosphere (or sequestered) when it is absorbed by plants as part of the biological carbon cycle.
- **Methane** is emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from livestock and other agricultural practices and from the decay of organic waste in municipal solid waste landfills.
- **Nitrous oxide** is emitted during agricultural and industrial activities, as well as during combustion of fossil fuels and solid waste.

Methods have been set forth to describe emissions of GHGs in terms of a single gas to simplify reporting and analysis. The most commonly accepted method to compare GHG emissions is the global warming potential (GWP) methodology defined in IPCC reference documents. IPCC defines the GWP of various GHG emissions on a normalized scale that recasts all GHG emissions in terms of carbon dioxide equivalent (CO₂e), which compares the gas in question to that of the same mass of CO₂ (CO₂ has a global warming potential of 1 by definition).

Table 3.5-1 lists the global warming potential of CO₂, CH₄, and N₂O and their lifetimes in the atmosphere.

³ Ibid.

Table 3.5-1: Lifetimes and Global Warming Potentials of Key Greenhouse Gases

Greenhouse Gas	Global Warming Potential (100 years)	Lifetime (years)
Carbon Dioxide (CO ₂)	1	— ^a
Methane (CH ₄)	25	12
Nitrous Oxide (N ₂ O)	298	114

^a No lifetime (years) for carbon dioxide was presented by CARB.

Source: California Air Resources Board. 2021. GHG Global Warming Potentials. Available: <https://ww2.arb.ca.gov/ghg-gwps>. Accessed: August 7, 2021.

The California Air Resources Board (CARB) recognizes the importance of short-lived climate pollutants (SLCP) (described in *Regulatory Setting*) and reducing these emissions to achieve the State’s overall climate change goals. SLCP’s have atmospheric lifetimes on the order of a few days to a few decades, and their relative climate forcing impacts, when measured in terms of how they heat the atmosphere, can be tens, hundreds, or even thousands of times greater than that of CO₂.⁴ Given their short-term lifespan and warming impact, short-lived climate pollutants are measured in terms of CO₂e using a 20-year time period. The use of GWPs with a time horizon of 20 years captures the importance of the short-lived climate pollutants and gives a better perspective as to the speed at which emission controls will affect the atmosphere relative to CO₂ emission controls. The Short-Lived Climate Pollutant Reduction Strategy (SLCP Reduction Strategy), as discussed in the Regulatory Setting, addresses CH₄, HFC gases, and anthropogenic black carbon. CH₄ has a lifetime of 12 years and a 20-year GWP of 72. HFC gases have lifetimes of 1.4 to 52 years and a 20-year GWP of 437 to 6,350. Anthropogenic black carbon has a lifetime of a few days to weeks and a 20-year GWP of 3,200. The Proposed Project’s emission sources are not major contributors of HFC and black carbon; thus, they are not discussed herein.

Greenhouse Gas Reporting

A GHG inventory is a quantification of all GHG emissions and sinks⁵ within a selected physical and/or economic boundary. GHG inventories can be performed on a large scale (e.g., for global and national entities) or on a small scale (e.g., for a building or person). Although many processes are difficult to evaluate, several agencies have developed tools to quantify emissions from certain sources. Table 3.5-2 outlines the most recent global, national, statewide, and local GHG inventories to help contextualize the magnitude of potential project-related emissions.

⁴ California Air Resources Board. 2017. *Short-Lived Climate Pollutant Reduction Strategy*. March. Available: https://ww2.arb.ca.gov/sites/default/files/2018-12/final_slcp_report%20Final%202017.pdf. Accessed: August 16, 2021.

⁵ A GHG sink is a process, activity, or mechanism that removes a GHG from the atmosphere.

Table 3.5-2: Global, National, State, and Regional Greenhouse Gas Emission Inventories

<i>Emissions Inventory</i>	<i>Carbon Dioxide Equivalent (MTCO_{2e})</i>
2020 United Nations Global Inventory ^a	54,000,000,000
2019 USEPA National Inventory ^b	5,981,400,000
2018 CARB State Inventory ^c	369,200,000
2015 BAAQMD GHG Emissions Inventory ^d	85,000,000
2022 Town of Woodside Greenhouse Gas Emissions Inventory ^e	89,998

MTCO_{2e} = metric tons of carbon dioxide equivalents

Sources:

- a. United Nations. 2022. *Emissions Gap Report 2022*. Available: <https://www.unep.org/resources/emissions-gap-report-2022>. Accessed: January 5, 2023.
- b. U.S. Environmental Protection Agency. 2022. *Inventory of U.S. Greenhouse Gas Emissions and Sinks, 1990-2020*. April. Available: <https://www.epa.gov/system/files/documents/2022-04/us-ghg-inventory-2022-main-text.pdf>. Accessed: January 5, 2023.
- c. California Air Resources Board. 2022. *California Greenhouse Gas Emissions for 2000 to 2020, Trends of Emissions and Other Indicators*. October 26. Available: https://ww2.arb.ca.gov/sites/default/files/classic/cc/inventory/2000-2020_ghg_inventory_trends.pdf. Accessed: January 5, 2023.
- d. Bay Area Air Quality Management District. 2017. *Final 2017 Clean Air Plan, Spare the Air, Cool the Climate*. Adopted: April 19. Available: https://www.baaqmd.gov/~/media/files/planning-and-research/plans/2017-clean-air-plan/attachment-a-_proposed-final-cap-vol-1-.pdf.pdf?la=en. Accessed: January 5, 2023.
- e. Town of Woodside. 2023. *Town of Woodside Annual Reporting for the Climate Action Plan CAP 2022*. Available: <https://www.woodsidetown.org/DocumentCenter/View/168/Annual-Report--February-2023-PDF>. Accessed: October 3, 2023.

Potential Climate Change Effects

Climate change is a complex process that has the potential to alter local climatic patterns and meteorology. Although modeling indicates that climate change will result in sea level rise (both globally and regionally) as well as changes in climate and rainfall, among other effects, there remains uncertainty about characterizing precise local climate characteristics and predicting precisely how various ecological and social systems will react to any changes in the existing climate at the local level. Regardless of this uncertainty, it is widely understood that substantial climate change is expected to occur in the future, although the precise extent will take further research to define. Specifically, significant impacts from global climate change worldwide and in California include the following.

- Declining sea ice and mountain snowpack levels, thereby increasing sea levels and sea surface evaporation rates with a corresponding increase in atmospheric water vapor, due to the atmosphere’s ability to hold more water vapor at higher temperatures.⁶

⁶ California Natural Resources Agency. 2018. *California’s Fourth Climate Change Assessment Statewide Summary Report*. Available: https://www.energy.ca.gov/sites/default/files/2019-11/Statewide_Reports-SUM-CCCA4-2018-013_Statewide_Summary_Report_ADA.pdf. Accessed: August 16, 2021.

- Rising average global sea levels primarily due to thermal expansion and the melting of glaciers, ice caps, and the Greenland and Antarctic ice sheets.⁷
- Changing weather patterns, including changes to precipitation and wind patterns, and more energetic aspects of extreme weather including droughts, heavy precipitation, heat waves, extreme cold, and the intensity of tropical cyclones.⁸
- Declining Sierra Nevada snowpack levels, which account for approximately half of the surface water storage in California, by 70 percent to as much as 90 percent over the next 100 years.⁹
- Increasing the number of days conducive to ozone formation (e.g., clear days with intense sun light) by 25 percent to 85 percent (depending on the future temperature scenario) by the end of the 21st century in high ozone areas.¹⁰
- Increasing the potential for erosion of California’s coastlines and seawater intrusion into the Sacramento Delta and associated levee systems due to the rise in sea level.¹¹
- Exacerbating the severity of drought conditions in California such that durations and intensities are amplified, ultimately increasing the risk of wildfires and consequential damage incurred.¹²
- Under changing climate conditions, agriculture is projected to experience lower crop yields due to extreme heat waves, heat stress and increased water needs of crops and livestock (particularly during dry and warm years), and new and changing pest and disease threats.¹³
- The impacts of climate change, such as increased heat-related events, droughts, and wildfires, pose direct and indirect risks to public health, as people will experience earlier death and worsening illnesses. Indirect impacts on public health include increased vector-borne diseases, stress and mental trauma due to extreme events and disasters, economic disruptions, and residential displacement.¹⁴

REGULATORY SETTING

Federal

There is currently no federal overarching law specifically related to climate change or the reduction of GHG emissions. However, fuel standards have been adopted to reduce GHG emissions from cars and light duty trucks and recent amendments have been proposed.

⁷ Intergovernmental Panel on Climate Change. 2018. *Global Warming of 1.5°C. Contribution of Working Group I, II, and III (Summary for Policy Makers)*. Available: https://www.ipcc.ch/site/assets/uploads/sites/2/2019/05/SR15_SPM_version_report_LR.pdf. Accessed: August 16, 2021.

⁸ Ibid.

⁹ California Natural Resources Agency. 2018. *California’s Fourth Climate Change Assessment Statewide Summary Report*. Available: https://www.energy.ca.gov/sites/default/files/2019-11/Statewide_Reports-SUM-CCCA4-2018-013_Statewide_Summary_Report_ADA.pdf. Accessed: August 16, 2021.

¹⁰ Ibid.

¹¹ Ibid.

¹² Ibid.

¹³ Ibid.

¹⁴ Ibid.

Corporate Average Fuel Economy Standards

The National Highway Traffic Safety Administration's (NHTSA's) Corporate Average Fuel Economy (CAFE) standards require substantial improvements in fuel economy and reductions in GHG emissions generated by passenger cars and light trucks (collectively, light-duty vehicles) sold in the U.S. Medium- and heavy-duty trucks and engines are also regulated separately. In March 2020, NHTSA and EPA published CAFE and carbon dioxide emissions standards for model years 2021-2026 under the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule that increased standards by 1.5 percent each year for light-duty vehicle model years 2021 through 2026. Originally, the SAFE Vehicles Rule Part One (SAFE I Rule) codified and pronounced that federal fuel economy standards preempted state and local laws. After a series of petitions, a filed lawsuit, extensive public comment, and a presidential executive order, NHTSA repealed the SAFE Vehicles Rule in December 2021. This decision allows California to continue to set state standards to address local communities' environmental and public health challenges including tailpipe emissions. In March 2022, NHTSA finalized revised CAFE Standards for model years 2024-2026, which require an industry-wide fleet average of approximately 49 miles per gallon (mpg) for light-duty vehicles in model year 2026 (increases 8 percent annually for model years 2024-2025 and 10 annually for model year 2026). NHTSA estimates that the final standards will avoid consumption of about 234 billion gallons of gas between model years 2030 to 2050 and reduce GHG emissions, air pollution, and the country's dependence on oil.

Energy Star Program

Energy Star is a joint program of the EPA and the U.S. Department of Energy (DOE). The program establishes criteria for energy efficiency for household products and labels energy efficient products with the Energy Star seal. For example, homes can earn the Energy Star certification if they are verified to meet the EPA's guidelines for energy efficiency. To earn the Energy Star certification in California, site-built or modular homes must meet energy efficiency performance targets as determined by energy modeling through a California Energy Commission- (CEC-) approved software program, construct the home using the preferred set of efficiency measures, and verify that the home meets every item on the National Rater Checklist through a Rater. Energy Star certified homes typically feature more efficient walls; windows; air ducts; heating, ventilation, and air conditioning (HVAC) system; and lighting and appliances that allow homeowners to operate their homes using less power and resources.

State

Statewide GHG Emission Targets

Reducing GHG emissions in California has been the focus of the State government for approximately two decades. GHG emission targets established by the State legislature include reducing statewide GHG emissions to 1990 levels by 2020 (AB 32) and then reducing them to 40 percent below 1990 levels by 2030 (Senate Bill [SB] 32, 2016), consistent with the target in EO B-30-15. EO S-3-05 calls for statewide GHG emissions to be reduced to 80 percent below 1990 levels by 2050. The State has achieved its goal for 2020 and is on track to achieving the goal for 2030, with ambitious plans (per EO B-55-18 and AB 1279 of 2022) to meet a more stringent goal of statewide carbon neutrality as soon as possible but no later than 2045 and maintain net

negative emissions thereafter, ahead of the previously established goal for 2050. As detailed in AB 1279, the State's carbon neutrality goal translates to a reduction of GHG emissions to at least 85 percent below 1990 levels.

AB 32 also authorized CARB to administer the State's Cap-and-Trade program, which covers GHG sources that emit more than 25,000 MTCO₂e per year, such as refineries, power plants, and industrial facilities. The Cap-and-Trade Regulation establishes a declining limit on these major sources, which cover approximately 80 percent of the State's GHG emissions, as an economic incentive for significant investment in cleaner, more efficient technologies. All covered entities in the Cap-and-Trade Program are still subject to existing air quality permit limits for criteria and toxic air pollutants.

AB 32 Scoping Plan

Per AB 32, CARB prepares a Scoping Plan that lays out the State's path to achieving its GHG emissions reduction targets. Most recently, the 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) outlines the main strategies California will implement to achieve the legislated GHG emissions target for 2030 and "substantially advance toward our 2050 climate goals."¹⁵ It also identifies the reductions needed by each GHG emission sector (e.g., industry, transportation, electricity generation), as well as places new emphasis on transitioning natural and working lands from a net emissions source (due to wildfires) to a carbon sink (via carbon sequestration). Unlike previous updates, the 2022 Scoping Plan does not include specific recommendations for local GHG emissions reductions targets or efficiency metrics (which were previously provided on a per capita and per service population basis). Rather, the 2022 Scoping Plan's Appendix D: Local Actions provide recommendations that focus on plans, measures, policies, and actions that local jurisdictions can take to ensure alignment with State climate goals. These "priority GHG reduction strategies" address transportation electrification, vehicle miles traveled (VMT) reduction, and building decarbonization as the primary, most effective ways that local jurisdictions can contribute to statewide GHG emissions reduction. The 2022 Scoping Plan recommends that local jurisdictions adopt these strategies as part of CEQA-qualified climate action plans (CAPs) and thereby be consistent with the State's Scoping Plan. Methods of determining consistency with the Scoping Plan are discussed in the Impacts Analysis section below.

State CEQA Guidelines

CEQA Guidelines Section 15064.4 provides guidance to lead agencies for determining the significance of environmental impacts pertaining to GHG emissions. CEQA Guidelines Section 15064.4(a) states that a lead agency should make a good-faith effort that is based, to the extent possible, on scientific and factual data to describe, calculate, or estimate the amount of GHG emissions that would result from implementation of a project. CEQA Guidelines Section 15064.4(b) also states that, when assessing the significance of impacts from GHG emissions, a lead agency should consider: (1) the extent to which the project may increase or reduce GHG emissions compared with existing conditions, (2) whether the project's GHG emissions would exceed a

¹⁵California Air Resources Board. 2017. California's 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target. November. Pages 1, 3, 5, 20, 25, and 26. Available: https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf. Accessed: August 16, 2021.

threshold of significance that the lead agency has determined to be applicable to the project, and (3) the extent to which the project would comply with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

The California Supreme Court's decision in *Center for Biological Diversity v. Department of Fish and Wildlife* (62 Cal. 4th 204), known as the "Newhall Ranch decision," confirmed that there are multiple potential pathways for evaluating GHG emissions consistent with CEQA. Several air quality management agencies throughout the state have also drafted or adopted varying threshold approaches and guidelines for analyzing GHG emissions in CEQA documents. Common threshold approaches include (1) compliance with a qualified GHG reduction strategy, (2) performance-based reductions, (3) numeric "bright-line" thresholds, (4) efficiency-based thresholds, and (5) compliance with regulatory programs. While the Newhall Ranch decision upheld use of the Scoping Plan's statewide goal of reducing GHG emissions as a threshold of significance for GHG emissions, if applied to a local project, the EIR must provide supporting evidence that the project emissions relate to the Scoping Plan. (See *Tsakopoulos Investments v. County of Sacramento* (2023) 95 Cal.App.5th 280.)

Low Carbon Fuel Standards

Approved in 2009 and implemented beginning in 2011, the Low Carbon Fuel Standards (LCFS) are one of the early action measures of the AB 32 Scoping Plan to reduce statewide GHG emissions by improving vehicle technology, reducing fuel consumption, and increasing transportation mobility options. The LCFS assesses direct emissions associated with producing, transporting, and using fuels and indirect emissions such as from land use changes for biofuels. Transportation fuel providers that must demonstrate that the mix of fuels they supply for use in California meets the LCFS carbon intensity standards for each annual compliance period. The LCFS were last updated in 2020 and reflect carbon intensity benchmarks through 2030, in line with SB 32.

Pavley Rules (AB 1493) and Advanced Clean Cars Program

Building on AB 1493 (also known as "Pavley I"), which requires CARB to adopt light-duty vehicle emissions standards beginning in 2009, the Advanced Clean Cars Program (formerly referred to as "Pavley II") combines several regulations, including the Low-Emission Vehicle (LEV) criteria and GHG regulations and the zero-emission vehicle (ZEV) regulation, into a single package. Advanced Clean Cars I, adopted in 2012, addressed vehicle model years 2015 through 2025 and was developed in coordination with EPA and NHTSA to harmonize GHG and fuel economy standards. The Advanced Clean Cars II regulations were adopted in 2022, imposing increasingly stringent low-emission and zero-emission vehicle standards for model years 2026 through 2035. Advanced Clean Cars II implements EO N-79-20, issued in September 2020, that established a statewide goal that 100 percent of in-state sales of new passenger cars and trucks will be zero-emission by 2035, 100 percent of medium-and heavy-duty vehicles in the State will be zero-emission by 2045 for all operations where feasible, and 100 percent of all drayage trucks will be zero-emission by 2035 where feasible. EO N-79-20 also establishes a goal to transition to 100 percent zero-emission off-road vehicles and equipment by 2035 where feasible. Amendments to Advanced Clean Cars II, including

updates to tailpipe GHG emissions standard and limited revisions to the LEV and ZEV regulations, were proposed in October 2023 and are currently under consideration.¹⁶

Electric Vehicle Charging Infrastructure (SB 454, SB 123, and EO B-48-18)

In complement to the Advanced Clean Cars Program, CARB's Electric Vehicle Supplement Equipment (EVSE or EV Charging Station) Standards Regulation establishes requirements for EV charging stations to implement SB 454 (Electric Vehicle Charging Stations Open Access Act of 2013). Signed in 2018, EO B-48-18 includes a \$2.5-billion initiative to construct 250,000 vehicle charging stations and 200 hydrogen fueling stations in California by 2025. In July 2023, SB 123 modified SB 454 to better harmonize with the National Electric Vehicle Infrastructure (NEVI) Program established in 2022, and the legislation also grants the California Energy Commission (CEC) authority to develop a new regulation that will supersede the current CARB-adopted rule.¹⁷

Vehicle Miles Traveled Metrics (SB 743)

Per SB 743 (2013), the Governor's Office of Planning and Research (OPR) implemented changes to the California Environmental Quality Act (CEQA) Guidelines, including the addition of Section 15064.3, which requires CEQA transportation analyses to move away from a focus on vehicle delay and level of service (LOS). In support of these changes, OPR published a Technical Advisory on Evaluating Transportation Impacts in CEQA, which recommends that the determination of the transportation impact of a project be based on whether project-related VMT per capita (or VMT per employee) would be 15 percent lower than that of existing development in the region. OPR's technical advisory explains that this criterion is consistent with Section 21099 of the California Public Resources Code, which states that the criteria for determining significance must "promote the reduction in greenhouse gas emissions."¹⁸

Renewable Portfolio Standards (SB 1078 and SB 107) and 100 Percent Clean Energy Act (SB 100)

The Renewable Portfolio Standards (RPS) were established in 2002 under SB 1078 and accelerated in 2006 under SB 107. The RPS requires increasing proportions of energy production from renewable sources including solar, wind, geothermal, and biomass generation. Electricity providers, such as PG&E, have been required to increase their renewable portfolio by one percent year over year. SB 100 (the 100 Percent Clean Energy Act of 2018) updated the RPS to ensure that by 2030, at least 60 percent of California's electricity is renewable. The legislation also sets a 2045 goal of powering all (100 percent) retail electricity sold in California and State agency electricity needs with renewable and zero-carbon resources.

¹⁶ California Air Resources Board, "Advanced Clean Cars Program – About," Accessed December 12, 2023, <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program/about>.

¹⁷ California Air Resources Board, "Electric Vehicle Supply Equipment (EVSE) Standards," Accessed December 12, 2023, <https://ww2.arb.ca.gov/our-work/programs/electric-vehicle-supply-equipment-evse-standards>.

¹⁸ Governor's Office of Planning and Research, Technical Advisory on Evaluating Transportation Impacts in CEQA, December 2018, https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf.

Clean Energy and Pollution Reduction Act of 2015 (SB 350)

The Clean Energy and Pollution Reduction Act (SB 350) established clean energy, clean air, and GHG reduction goals. Specifically, SB 350 increases California’s renewable electricity procurement goal from 33 percent by 2020 to 50 percent by 2030, utilizing RPS eligible resources (described above). To double statewide energy efficiency savings in electricity and natural gas by 2030, SB 350 also requires large utilities to submit integrated resource plans (IRPs) that detail how they will meet their customers’ resource needs, reduce GHG emissions, and ramp up the use of clean energy resources. The CPUC, CARB, and CEC coordinate to support transportation electrification. They also identify and assess barriers to and opportunities for solar photovoltaic energy generations, access to other renewable energy, barriers to energy efficiency and weatherization investments, barriers to contracting opportunities for local small businesses, and access to zero- and near-zero-emission transportation options – specifically for low-income customers, including those in disadvantaged communities.

AB 802, also signed into law in 2015, supports SB 350 by authorizing the CEC to create a building energy-use benchmarking and disclosure program to improve the development and evaluation of policy and programs and the state’s energy infrastructure planning efforts. AB 802 also authorizes electrical and gas corporations to provide financial incentives to their customers that increases the energy efficiency of existing buildings based on all estimated energy savings and energy usage reductions.¹⁹

Building Energy Efficiency Standards (Title 24, Part 6)

The energy consumption of new residential and nonresidential buildings in California is regulated by the California Code of Regulations (CCR), Title 24, Part 6, Building Energy Efficiency Standards (also referred to as the Energy Code). The CEC updates the Energy Code every three years with more stringent design requirements to reduce energy consumption, resulting in lower GHG emissions. The 2022 Energy Code, which was adopted in August 2021 and took effect on January 1, 2023, encourages efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, strengthens ventilation standards, and more. The 2022 Energy Code also introduces new requirements for low-rise multifamily buildings. According to the Impact Analysis of the 2022 Energy Code, the 2022 update would save 5,472 giga BTUs (GBTUs) of site energy, 1,565 gigawatt-hours (GWh) of electric energy, 14.39 million therms of gas energy, 46,782 giga time-dependent valuation energy, 2,954 GBTUs of hourly source energy, and 285,214 MTCO₂e per year over the 2019 Energy Code, while also providing an annual non-coincident peak demand reduction of 123 megawatts (MW).²⁰

¹⁹ California Energy Commission, “Clean Energy and Pollution Reduction Act – SB 350,” Accessed December 13, 2023, <https://www.energy.ca.gov/rules-and-regulations/energy-suppliers-reporting/clean-energy-and-pollution-reduction-act-sb-350>.

²⁰ California Energy Commission, 2022 Energy Code Impact Analysis (TN #: 250892), [Prepared by NORESO and Frontier Energy], June 30, 2023, Available at: <https://www.energy.ca.gov/publications/2023/impact-analysis-2022-update-california-energy-code>.

Green Building Standards Code (Title 24, Part 11)

CCR, Title 24, Part 11 constitutes the California Green Building Standards Code, known as CALGreen, which is the nation's first mandatory green building standards code developed by the California Building Standards Commission (CSBSC) in 2007 to meet the goals of AB 32. CALGreen applies to nonresidential structures including new buildings or portions of new buildings, additions and alterations, and all occupancies where no other state agency has the authority to adopt green building standards applicable to the occupancies. The code features: regulations for energy efficiency, water efficiency and conservation, material conservation and resource efficiency, environmental quality, and more; mandatory provisions for commercial, residential, and public school buildings; appendices with voluntary provisions for all of these occupancies, plus hospitals; and residential and nonresidential provisions. Voluntary measures are often referred to by their level of achieving enhanced construction or incorporation of additional green building measures beyond the minimum mandatory requirements; "Tier 1" requirements are more stringent than the base mandatory provisions, and "Tier 2" achieves an even higher standard. CALGreen undergoes triennial updates, mostly recently including the 2022 CALGreen Code, which took effect on January 1, 2023.

Solid Waste Diversion (AB 939 and AB 341)

In 2011, AB 341 modified the California Integrated Waste Management Act of 1989 (AB 939) and directed the California Department of Resources Recycling and Recovery (CalRecycle) to develop and adopt regulations for mandatory commercial recycling. AB 341 also established a statewide recycling goal of 75 percent, while the 50-percent disposal reduction mandate established under AB 939 still applies to cities and counties. Although California's infrastructure currently only diverts about half of the state's waste stream and is not large enough to handle the large amount of potentially recyclable materials collected by local governments and partners in the solid waste industry, the State has shifted focus on reducing GHG emissions that have the most immediate impact on climate (i.e., SLCP).

Short-Lived Climate Pollutant Reduction Strategy (SB 1383)

In 2016, SB 1383 directed CARB to approve and implement the SLCP Reduction Strategy to achieve 40 percent reduction in CH₄, 40 percent reduction in HFC gases, and 50 percent reduction in anthropogenic black carbon, relative to 2013 levels by 2030. SB 1383 also establishes targets for reducing organic waste in landfills (50 percent reduction in organic waste disposal relative to 2014 levels by 2020 and 75 percent by 2025) as well as CH₄ emissions from dairy and livestock operations (40 percent reduction relative to the livestock and dairy sectors' 2013 levels by 2030).

CARB adopted the SLCP Reduction Strategy in March 2017 as a framework for achieving the CH₄, HFC, and anthropogenic black carbon reduction targets set by SB 1383. The SLCP Reduction Strategy includes 10 measures to reduce SLCPs, which fit within a wide range of ongoing planning efforts throughout the state. For example, in 2019, CARB and CalRecycle proposed new and amended regulations to CCR Title 14 and Title 27 that set forth minimum standards for organic waste collection, hauling, and composting that took effect on January 1, 2022. Since then, 75 percent of California communities report they have residential organic waste

collection in place. According to CalRecycle, California now has 206 organic waste processing facilities, with 20 more on the way.²¹

Water Conservation Act of 2009 (SB X7-7) and 2018 Water Conservation Legislation (SB 606 and AB 1668)

The Water Conservation Act of 2009 (SB X7-7) requires all water suppliers to increase their water use efficiency and establishes the “20x2020 Water Use Targets” to reduce per capita urban water use by 20 percent as of December 31, 2020. Reductions in water consumption reduce the amount of energy, as well as the emissions, associated with conveying, treating, and distributing the water; emissions from wastewater treatment are also reduced.

The California Department of Water Resources (DWR) collects data and monitors compliance with water use targets and objectives established by SB X7-7 in addition to other reporting requirements (e.g., validated distribution system water loss audits, Urban Water Management Plans, and Model Water Efficient Landscape Ordinances). DWR, in coordination with the State Water Board, also implements the 2018 Water Conservation Legislation (AB 1668 and SB 606), which establish standards to exceed SB X7-7 targets and establish a new framework for long-term improvements in urban water use efficiency and drought planning. The standards do not apply to certain commercial, industrial, and institutional (CII) water uses that are separately subject to CII water use performance measures.

Regional

Metropolitan Transportation Commission

The MTC is the Metropolitan Planning Organization for the nine counties that comprise the San Francisco Bay Area and the San Francisco Bay Area Air Basin (SFBAAB), which includes San Mateo County and the Town of Woodside. The first per-capita GHG emissions reduction targets for the SFBAAB were seven percent by 2020 and 15 percent by 2035 from 2005 levels. MTC adopted an SCS as part of their RTP for the SFBAAB in 2013 known as Plan Bay Area.²² On July 26, 2017, the strategic update to this plan, known as Plan Bay Area 2040, was adopted by the Association of Bay Area Governments (ABAG) and the MTC. As a limited and focused update, Plan Bay Area 2040 builds upon the growth pattern and strategies developed in the original Plan Bay Area but with updated planning assumptions that incorporate key economic, demographic, and financial trends since 2013.²³ The next update to Plan Bay Area, Plan Bay Area 2050, was adopted in October 2021. Plan Bay Area 2050 serves as a roadmap for the San Francisco Bay Area’s future through 2050.²⁴ For the San Francisco Bay Area, the per capita GHG emissions

²¹ CalRecycle, “California’s Climate Progress on SB 1383,” Accessed December 13, 2023, <https://calrecycle.ca.gov/organics/slcp/progress/>.

²³ Metropolitan Transportation Commission and Association of Bay Area Governments. 2017. *Plan Bay Area 2040*. Adopted July 26. Available: <http://files.mtc.ca.gov/library/pub/30060.pdf>. Accessed: August 16, 2021.

²⁴ Association of Bay Area Governments and Metropolitan Transportation Commission. 2021. *Plan Bay Area 2050: A Vision for the Future*,

reduction target applicable to Plan Bay Area 2050 is 19 percent by 2035 (i.e., emissions from vehicles and light-duty trucks compared with 2005 levels).

Bay Area Air Quality Management District

The Bay Area Air Quality Management District (BAAQMD) is the primary agency responsible for addressing air quality concerns in the San Francisco Bay Area, including San Mateo County. BAAQMD has adopted advisory emission thresholds to assist CEQA lead agencies in determining the level of significance of a project's GHG emissions, including long range plans (e.g., general plans, specific plans), which are outlined in *its California Environmental Quality Act: Air Quality Guidelines* (CEQA Guidelines).²⁵ The CEQA Guidelines also outline methods for quantifying GHG emissions, as well as potential mitigation measures.

Local

Town of Woodside Climate Action Plan (CAP)

The Town of Woodside Climate Action Plan (CAP) was adopted in 2015 and establishes GHG reduction targets to meet the State and community's goals. The purpose of the Plan is to describe the principal sources of the Town of Woodside's greenhouse gas (GHG) emissions, and to outline the goals and measures the Town has identified for achieving the community's target of reducing emissions to 15 percent below 2005 levels by 2020. The Town identified 20 local measures to be implemented during the planning period (2015-2020) to reduce GHG emissions. The Town met the emission reduction target of 15 percent through the Total Statewide Initiative Emissions Reductions and implementation of the Town's local measures. Total estimated reductions were nearly 24 percent compared to 2020 business as usual emission levels (at 118,298 MTCO₂e).

Woodside General Plan 2012

The Town of Woodside General Plan 2012 (General Plan) includes the following goals and policies associated with greenhouse gas emissions:

Goal S1: Conserve Resources.

Policy S-1.1: Protect and conserve water resources.

Policy S-1.2: Encourage and support renewable clean energy.

Policy S-1.3: Encourage recycling and waste management.

Policy S-2.1: Encourage increased building energy efficiency.

https://www.planbayarea.org/sites/default/files/documents/Plan_Bay_Area_2050_October_2021.pdf, accessed January 3, 2022.

²⁵ Bay Area Air Quality Management District. 2017. *California Environmental Quality Act Air Quality Guidelines*. May. Available: https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en. Accessed: August 16, 2021.

Policy S-2.2: Encourage the reuse of buildings and building materials.

Policy S-2.3: Maintain carbon absorption resources.

Policy S-2.4: Reduce vehicle trips.

Policy S-2.5: Reduce the carbon footprint of all town activities.

Policy S-2.6: Reduce the carbon footprint of government operations.

Policy S-2.7: Maintain greenhouse gas emissions data.

Town of Woodside Municipal Code (Town Code)

Chapter 50, Section 50.33 of the Town Code regulates construction, recycling, and disposal of waste generated from construction, demolition, and renovation projects. The ordinance requires that 60 percent of the waste tonnage of construction and demolition debris generated from every covered project shall be diverted from going to landfill by using recycling, reuse, and diversion programs. Separate Waste Management Plans will be required for the demolition and for the construction portion of covered projects involving both demolition and construction.

Impact Analysis

For the purposes of this EIR, a significant impact would occur if the Proposed Project would:

Criterion 1: Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or

Criterion 2: Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing emissions of GHGs.

APPLICABILITY OF AVAILABLE THRESHOLDS

GHG Emissions Thresholds

CEQA Guidelines Section 15064.4 directs lead agencies to “make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of greenhouse gas emissions resulting from a project.” In alignment with existing laws and regulations (as described in the Regulatory Settings), OPR guidance suggests that lead agencies may take a qualitative or quantitative approach to analyze potential significance of climate change impacts on the environment.

Unlike criteria air pollutants, which are generally considered regional or local concerns, GHGs are global pollutants that are driving global climate change. As discussed in the Environmental Setting, GHGs have long atmospheric lifetimes, and continuous GHG emissions generated worldwide cumulatively contribute to past, present, and future carbon in the atmosphere. Accordingly,

generation of GHG emissions by the Proposed Plan are assessed cumulatively, using a combination of qualitative and quantitative methods, where feasible.

The Newhall Ranch decision establishes that lead agencies must reasonably substantiate the applicability of quantitative statewide emissions thresholds, such as those provided in the 2017 and 2022 Scoping Plans, in determining the significance of GHG impacts from a project – especially in consideration of the specific location and scope of the project. As discussed in the Regulatory Setting, existing State laws and regulations have continued to shift the trajectory of statewide GHG emissions downward, most recently aiming for carbon neutrality by 2045. In response, regulatory programs like the Advanced Clean Cars Program, the Cap-and-Trade program, LCFS, and RPS are examples of market-based approaches that target reductions from significant emissions sources and specific sectors throughout the state. Such regulations are expected to continue to impact local GHG emissions inventories; however, they are not considered sufficient or appropriate measures for mitigating a project’s impacts, and local jurisdictions have limited influence over such actions. Rather, recent State guidance encourages local jurisdictions to support statewide objectives to reduce GHG emissions through climate action planning and land use control. Specifically, the 2022 Scoping Plan recommends adoption of a CEQA-qualified CAP and incorporation of key project attributes that reduce GHGs by electrifying transportation, reducing VMT, and decarbonizing buildings.²⁶ OPR guidance also maintains that a “land use development project that produces low VMT, achieves applicable building energy efficiency standards, uses no natural gas or other fossil fuels, and includes Energy Star appliances where available, may be able to demonstrate a less-than-significant greenhouse gas impact associated with project operation.”

As discussed in the Regulatory Settings, there are three quantitative emissions thresholds commonly used to determine the significance level of a project’s GHG impacts. These thresholds and their limitations are described below:

- Efficiency-based thresholds are useful for assessing projects of various types, sizes, and locations because they can be expressed on a per-capita basis for residential projects, a per-employee basis for commercial project, or a per-service-population (the sum of jobs and residents) basis for a mixed-use project. Although CARB provided efficiency metrics in the 2017 Scoping Plan (6.0 MTCO₂e per capita by 2030 and no more than 2.0 MTCO₂e per capita by 2050), these are no longer supported in the 2022 Scoping Plan.
- Numeric bright lines (i.e., not-to-exceed values) provide clear quantitative thresholds, but they are correspondingly specific and therefore limited to certain conditions and applications. For example, the Town of Woodside CAP quantified the amount of GHG reductions needed to achieve the established targets. However, the Town of Woodside adopted a CAP in 2015 to meet 2020 targets. It has not been updated to address emissions

²⁶ CARB has only developed recommendations for proposed plans and residential and mixed-use (with at least two-thirds residential square footage) development project types at this time and “plans to continue to explore new approaches for other land use types in the future.” California Air Resources Board, “Section 3.2: Evaluating Plan-Level and Project-Level Alignment with the State’s Climate Goals in CEQA GHG Analyses,” 2022 Scoping Plan Appendix D: Local Actions, November 2022, <https://ww2.arb.ca.gov/sites/default/files/2022-11/2022-sp-appendix-d-local-actions.pdf>.

beyond 2020; therefore, tiering per CEQA Guidelines Section 15183.5 is not an applicable option to assess the Proposed Project's GHG impacts.

- Performance-based thresholds (e.g., percent reductions from baseline) are established by AB 32, SB 32, EO S-3-05, and EO B-55-18 and are useful for tracking progress toward targets. In coordination with State performance-based thresholds, BAAQMD's 2022 GHG significance thresholds state that a land use development plan has the potential to result in a significant impact if it cannot demonstrate consistency with: A) Meet the State's goals to reduce emissions to 40 percent below 1990 levels by 2030 and carbon neutrality by 2045; or B) Be consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b). Given that the Town's CAP is not updated, BAAQMD's performance-based Criterion A is the most applicable threshold for the Proposed Project. It is noted that this approach requires an accurate "apples-to-apples" comparison between the baseline (e.g., 1990) and analysis year emissions in order to properly contextualize the performance levels; it is assumed that quantification methods (described further below) are sufficient to analyze the general magnitude, under a conservative estimate, of the Proposed Plan's impact.

Given the programmatic nature of the Proposed Plan and the corresponding lack of sufficient information about specific project details, comprehensive and precise levels of GHG emissions cannot be quantified for the Proposed Plan to accurately determine significance based on quantitative thresholds alone. As required under CEQA, GHG emissions generated by the Proposed Plan have been estimated (as feasible), disclosed, and discussed relative to these metrics, but evaluation of the Proposed Plan's impacts is ultimately assessed in combination with the qualitative analysis.

Qualitative thresholds include compliance with a qualified GHG reduction strategy and compliance with applicable regulatory programs. As described in the Regulatory Setting, applicable plans, policies, and regulations adopted for the purpose of reducing GHG emissions include AB 32, SB 32, EO S-3-05, EO B-55-18, the 2022 Scoping Plan, and SB 375. According to CARB and OPR, consistency with State efforts for transportation electrification, VMT reduction, and building decarbonization would constitute compliance with these regulations and result in a less-than-significant impact. Consistency with SB 375 is also assessed qualitatively, and conflict with any applicable strategies of AMBAG's 2045 MTP/SCS would constitute a significant impact. The Proposed Plan must align with both qualitative and quantitative criteria to have a less-than-significant impact.

METHODOLOGY AND ASSUMPTIONS

GHG and energy impacts associated with construction and operation of the Proposed Project were assessed and quantified (where applicable) using standard and accepted software tools, methodologies, and emission factors. A full list of assumptions can be found in Appendix E: GHG and Air Quality Data.

As discussed in Chapter 2: Project Description, the Proposed Project would facilitate development of up to 423 housing units, which would primarily involve construction of smaller scale housing construction in established neighborhoods on existing lots and infill sites as well as multifamily housing at 773 Canada Road, Raymundo Drive at Runnymede Road, High Road at Woodside Road,

and Canada College. This amount of development would result in up to approximately 1,019 new residents.²⁷

Construction

Housing units that would be developed under the Proposed Project would require energy and generate construction-related GHG emissions from mobile and stationary construction equipment exhaust and employee and haul truck vehicle exhaust. Construction activities may also require additional electricity consumption or result in tree removal, which would correspond with a loss of pollutant and GHG sequestration potential as well as other long-term ecological benefits. With an anticipated buildout year of 2031, development of the various land uses associated with the Proposed Project would occur over an extended period and would depend on factors such as local economic conditions, market demand, and other financing considerations. However, the specific size, location, and construction techniques and scheduling that would be utilized for each individual development project occurring within the Planning Area from implementation of the Proposed Project is not currently known. Without specific project-level details (e.g., construction schedule, equipment fleet, construction worker crew estimates, and demolition and grading quantities), it is not possible to develop a refined construction inventory, and the determination of construction emission and energy use impacts associated with GHGs and energy resources for each individual development project, or a combination of these projects, would be speculative regarding such potential future project-level environmental impacts. Thus, in the absence of the necessary construction information required to provide an informative and meaningful analysis, the evaluation of potential construction-related impacts resulting from implementation of the Proposed Project is conducted qualitatively in this Draft EIR and assessed against applicable BAAQMD criteria.

Operations

Operation of the land uses introduced by the Proposed Project would require energy (electricity and natural gas) consumption and generate long-term emissions of CO₂, CH₄, and N₂O. GHG emissions are expected during operation of the land uses associated with the Proposed Project from area, energy, mobile, waste, and water sources. Area sources include landscaping activities. Energy sources include electricity consumption and natural gas combustion for lighting and heating requirements. Mobile sources are vehicle trips that are generated by the service population associated with the Proposed Project. Waste sources refer to CH₄ and N₂O from the decomposition of waste generated from the new land use developments in the Planning Area. Water sources include electricity consumption for the supply, treatment, and distribution of water for the new land uses.

Long-term (i.e., operational) GHG emissions were quantified for the Proposed Project using California Emissions Estimator Model (CalEEMod), version 2022.1. Like area sources, energy, waste, and water emissions were modeled according to the amount (i.e., commercial/industrial

²⁷ Projected new population is calculated from multiplying the projected housing units and the town's vacancy rate of 11.4 percent. This value is then subtracted from the projected housing units and then multiplied by the town's average household size of 2.72 persons. Vacancy rates and average household size data are from the State of California Department of Finance, E-5 Population and Housing Estimates for Cities, Counties, and the State (2021).

square footage or number of dwelling units) and type of land uses proposed. Energy sources account for emissions associated with the combustion of natural gas for building heating and hot water, but do not account for natural gas and wood fireplaces, which are prohibited in the air basin per BAAQMD Regulation 6, Rule 3. Quantification of energy use (i.e., gasoline and diesel fuel) additionally accounts for the daily vehicle trips generated by the Proposed Project. Waste and water directly relate to the scale of the land use inputs.

Stationary sources such as emergency generators and boilers that would be developed for each individual development project, or a combination of these projects, would be subject to the permitting requirements by the BAAQMD. These are not included in modeled emissions because details of future projects and their stationary sources cannot be known at this time.

In accordance with the traffic data analysis provided by the Proposed Project's traffic engineers, Parisi Transportation Consulting, emissions were quantified for existing 2020 conditions based on land uses and home-based VMT per capita traffic data. Full detail about modeling inputs is provided in Appendix E. Future-year 2031 conditions were quantified for the Proposed Project based on anticipated land uses and modeled in conjunction with traffic data. As noted above, construction and stationary sources are not modeled. The effect of vegetated open space in the Planning Area is also excluded from quantified emissions but is noted in qualitative discussion.

RELEVANT PROPOSED PROJECT GOALS, POLICIES, AND PROGRAMS

- Policy H2.1** Provide Opportunities for Varied Housing Types with Access to High Resource Areas Amenities (schools, libraries, retail, restaurants, and services), and Transit Routes, including Bus Stops, Designated Bicycle Lanes, and Safe Routes to School Pathways.
- Policy H3.1** Support New Independent Housing at Cañada College.
- Policy H3.2** Rezone Properties Allowing Increased Housing Density.
- Policy H3.3** Incentivize Higher Density Housing.
- Policy H6.3** Promote Sustainability Including Energy Efficient Housing.

IMPACTS

- Impact 3.5-1** **Development under the Proposed Project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. (Construction: Less than Significant with**

Mitigation Incorporated; Operations: Significant and Unavoidable with Mitigation Incorporated)

Construction

Construction associated with new land use developments under the Proposed Project would result in the temporary generation of GHG emissions within the Planning Area. Emissions would originate from mobile and stationary construction equipment, worker and haul truck trips traveling to and from project sites, and electricity consumption. Construction-related GHG emissions would vary substantially depending on the level of activity, length of the construction period, specific construction operations, types of equipment, and number of personnel.

By its nature as a specific plan, the Proposed Project does not propose any specific development except those projects currently under environmental review or approved, but not yet constructed. Construction of land use developments allowable under the Proposed Project would occur incrementally within the Planning Area throughout the course of the eight-year buildout period. As the timing and intensity of future development projects is not known at this time, the precise effects of construction activities associated with buildout of the Proposed Project cannot be quantified at this time. Development would be driven by market conditions, site constraints, land availability, and property owner interest. It is assumed that implementation of the Proposed Project ultimately could result in the development of up to 423 housing units, including smaller scale infill development in established residential neighborhoods and additional multi-family housing on four key sites to provide varied housing types. As such, it is anticipated that in any given year, multiple land use development projects will be constructed within the Planning Area.

As noted previously, BAAQMD has not established a quantitative threshold for assessing construction-related GHG emissions. Rather, the air district recommends evaluating whether construction activities would conflict with statewide emission reduction goals and implement feasible BMPs. Therefore, construction-related GHG emissions from the Proposed Project would be required to comply with **Mitigation Measure GHG-1** which requires implementation of BAAQMD-recommended BMPs, including ensuring that alternative fueled construction vehicles/equipment make up at least 15 percent of the fleet and the use local building materials of at least 10 percent. As such, MM GHG-1 would reduce construction emissions consistent with BAAQMD guidance and statewide emission reduction goals. In accordance with California's Green Building Standards Code (CALGreen), the Town of Woodside also currently requires construction and demolition projects to recycle at least 60 percent of the local construction and demolition debris generated by a project (Chapter 50, Section 50.33 of the Town Code). Project applicants must complete also separate Waste Management Plans for the demolition and for the construction portion of projects. Accordingly, this impact would be less than significant with the incorporation of mitigation.

Operation

BAAQMD's 2022 GHG significance thresholds state that a land use development plan, such as the Proposed Project, has the potential to result in a significant impact if it cannot demonstrate consistency with Criterion A or Criterion B:

- A. Meet the State’s goals to reduce emissions to 40 percent below 1990 levels by 2030 and carbon neutrality by 2045; or
- B. Be consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b).

As discussed under the Regulatory Setting, the Town of Woodside adopted a CAP in 2015 to meet 2020 targets. It has not been updated to address emissions beyond 2020; therefore, tiering per CEQA Guidelines Section 15183.5 is not an applicable option to assess the Proposed Project’s GHG impacts. Therefore, this operational analysis considers consistency with Criterion A.

Operation of land uses pursuant to the Proposed Project would generate direct and indirect GHG emissions. Sources of direct emissions include mobile vehicle trips, natural gas combustion, and landscaping activities. Indirect emissions would be generated by electricity generation and consumption, waste and wastewater generation, solid waste, and water use. Operational emissions for baseline and 2031 future conditions are summarized in Table 3.5-3. The modeled emissions for the Proposed Project are a conservative estimate of the Proposed Project’s impact on GHGs. While the Proposed Project would achieve additional GHG reductions through voluntary sustainability features, such as rooftop solar panels, the quantified reductions in GHGs from these strategies are currently unknown.

As shown in Table 3.5-3, operational emissions generated by the Project would still result in a net increase in annual emissions of 1,799 MTCO_{2e} compared to existing conditions. As seen in Table 3.5-3, a substantial increase in emissions from mobile and energy sources is projected due to increases in vehicular trips and greater natural gas and electricity consumption, and a slight increase in emissions from area, waste, water, and refrigerant or refrigeration sources. These increases reflect the increase from existing conditions in population and number of housing units resulting from buildout of the Proposed Project.

Table 3.5-3: Estimated Proposed Project Operational GHG Emissions

<i>Condition</i>	<i>Source</i>	<i>Annual GHG Emissions (MTCO_{2e}/year)^a</i>
Existing	Mobile ^b	1,822
	Area	148
	Energy	18,951
	Water	856
	Waste	2,877
	Refrig.	9.17
	Total	24,663
Proposed Project	Mobile ^b	2,457
	Area	165
	Energy	19,957
	Water	902
	Waste	2,972
	Refrig.	10.0
	Total	26,462
Net Change from Existing		+1,799

Notes:

MTCO_{2e} = metric tons of carbon dioxide equivalents

SF = square feet

^a Values may not add up to the totals shown due to rounding.

^b Mobile source emissions only account for Home-Based VMT for residential uses, not total VMT, and thus may be an underestimate of total mobile emissions. Home-based VMT is the metric that OPR recommends for VMT CEQA assessments for residential land uses.

Source: See Appendix D for modeling files.

Table 3.5-4 shows how the Proposed Plan’s performance-based metrics compare with reduction targets established by the State. At a minimum, the Proposed Plan would need to meet the 2030 target, which is within the planning period. Although existing operational emissions are on track to meet the target of 40 percent below 1990 levels (or 25 percent below 2005 levels) by 2030, the Proposed Plan would generate additional emissions that would lower the performance metric from 40.1 percent to about 38.6 percent below 1990 levels in 2031 and therefore would conflict with the State’s established target for 2030. Given the net increase in emissions and inability to meet the 2030 target, the Proposed Plan could have a potentially significant impact due to the generation of GHGs.

Table 3.5-4: GHG Reduction Targets and Performance-Based Metrics

Year/Source	Percent Below 1990 Levels ¹
GHG Emissions Reduction Targets	
2030 (SB 32) ²	40%
2045 (AB 1279, Executive Order B-55-18)	85%
GHG Emissions Estimates	
2022 Existing ³	40.1%
2031 Existing + Proposed Plan	38.6%

Notes:

1. 1990 levels are derived from 2005 levels reported in the Town of Woodside CAP. See note below for methodology.
 2. The Town of Woodside CAP establishes GHG reduction targets relative to the 2005 baseline, which is estimated to be 15% above 1990 levels. The 2030 goal of 25% reduction below 2005 is therefore equivalent to 40% reduction below 1990 levels.
 3. 2022 Existing emissions and reduction progress are derived from the Town of Woodside Climate Action Plan Implementation Program (2022) at <https://www.woodsideca.gov/DocumentCenter/View/168/Annual-Report---February-2023-PDF>.
-

It is noted that the Proposed Project has a horizon year of 2031, which is well before the 2045 State carbon neutrality target. As such, reducing GHG emissions to achieve the 2045 threshold will be a coordinated statewide effort involving multiple sectors and factors outside of the Proposed Project’s scope and buildout timeframe. Even so, **Mitigation Measure GHG-2** would require the Town to update its CAP to reach carbon neutrality by 2045, consistent with Executive Order B-55-18. The updated CAP shall include community emission forecasts that incorporate the changes in population and number of households anticipated under the Proposed Project.

Under the Proposed Project, the Town of Woodside is not on track to meet the State's goals to reduce emissions to 40 percent below 1990 levels by 2030 and carbon neutrality by 2045. Therefore, the DEIR recommends a **Mitigation Measure GHG-2** pursuant to which the Town will update the CAP to identify measures necessary for compliance with State targets; however, as this update has not yet been completed and the specific measures have not yet been identified, the DEIR conservatively concludes that the associated impact would remain significant and unavoidable even after implementation of this mitigation measure.

Mitigation Measures

MM-GHG-1: Require Implementation of BAAQMD-recommended BMPs. As a standard condition of project approval, the Town shall require that all new construction and major remodels ensure through terms of contract that their contractors implement the following BAAQMD's recommended best management practices to reduce construction-related GHG emissions (based on BAAQMD's CEQA Guidelines):

- Ensure alternative fueled (e.g., biodiesel, electric) construction vehicles/equipment make up at least 15 percent of the fleet.
- Use local building materials of at least 10 percent (sourced from within 100 miles of the Planning Area).

MM-GHG-2: Update the Town of Woodside Climate Action Plan. The Town of Woodside shall adopt and begin to implement an updated Climate Action Plan within a goal of 18 months, but no later than 36 months, of adopting the Proposed Project in order to address the GHG reduction goals of Executive Order B-30-15 and Executive Order S-03-05 for GHG sectors that the Town has direct or indirect jurisdictional control over. The Climate Action Plan shall include a community inventory of GHG emission sources, and quantifiable GHG emissions reduction targets for 2030 and 2050, that are consistent with the statewide GHG reduction targets. The Town shall monitor progress toward its GHG emissions reduction goals and prepare reports every five years detailing that progress.

Significance After Mitigation: Significant and Unavoidable

Impact 3.5-2 Development under the Proposed Project would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. (Construction: Less than Significant with Mitigation Incorporated; Operations: Significant and Unavoidable)

AB 32, SB 32, AB 1279, and EO B-55-18

AB 32 and SB 32 outline the State's GHG emissions reduction targets for 2020 and 2030, respectively. EO B-55-18 sets a more ambitious State goal of net zero GHG emissions by 2045. AB

1279 codifies California's statewide carbon neutrality goal. The measure requires statewide carbon neutrality "as soon as possible," but no later than 2045.

In 2008 and 2014, CARB adopted the Scoping Plan and First Update, respectively, as a framework for achieving AB 32. The Scoping Plan and First Update outline a series of technologically feasible and cost-effective measures to reduce statewide GHG emissions. CARB adopted the Climate Change Scoping Plan in November 2017 as a framework to achieve the 2030 GHG reduction goal described in SB 32. In addition, CARB's 2022 Scoping Plan for Achieving Carbon Neutrality was adopted in November and extends and expands upon these earlier plans with a target of reducing anthropogenic emissions to 85 percent below 1990 levels by 2045.

CARB's 2022 Scoping Plan identifies a technologically feasible and cost-effective path to achieve carbon neutrality by 2045 while also assessing the progress California is making toward reducing its GHG emissions by at least 40 percent below 1990 levels by 2030, as called for in SB 32 and laid out in the 2017 Scoping Plan. The 2022 Scoping Plan reinforces that meeting these targets will require effective State regulations, including Cap-and-Trade, the requirement for increased renewable energy sources in California's energy supply, updates to Title 24, and increased emission reduction requirements for mobile sources. The 2022 Scoping Plan indicates that reductions would need to come in the form of changes pertaining to vehicle emissions and mileage standards, changes pertaining to sources of electricity and increased energy efficiency at existing facilities, and State and local plans, policies, or regulations that will lower GHG emissions relative to business-as-usual conditions. The 2022 Scoping Plan carries forward GHG reduction measures from previous plans, as well as new potential measures to help achieve the State's 2030 and 2045 targets across all sectors of the California economy, including transportation, energy, and industry.

Construction

Construction activities for future development within the Planning Area would result in the generation of GHG emissions, originating from the exhaust of both mobile and stationary construction equipment as well as exhaust from employees' vehicles and haul trucks, and electricity. Construction-related GHG emissions from each specific source would be limited to the construction period and would vary substantially, depending on the level of activity, length of the construction period for each development, specific construction operations, types of equipment, and number of personnel. GHG emissions generated by the construction activities would be short term and would cease once construction is complete.

As described above, BAAQMD has not established a quantitative threshold for assessing construction-related GHG emissions. Rather, BAAQMD recommends evaluating whether construction activities would conflict with statewide emission reduction goals, based on whether feasible BMPs for reducing GHG emissions would be implemented. If a project fails to implement feasible BMPs identified by BAAQMD, its GHG emissions could conflict with statewide emission goals and represent a cumulatively considerable contribution to climate change, which would be a potentially significant impact. Construction-related GHG emissions from the Proposed Project would be required to comply with **Mitigation Measure GHG-1**, which requires future development projects to implement BAAQMD-recommended BMPs which would reduce the level of GHGs associated with construction of the future projects and avoid any conflict with statewide GHG

reduction goals, thereby reducing this impact to a less than significant level with mitigation incorporated.

Operations

As discussed in Impact 3.5-1, emissions from area and energy sources would conflict with the Statewide 2030 and 2045 reduction targets, since implementation of the Proposed Project would not result in emissions 40 percent below 1990 levels by 2030 nor carbon neutrality by 2045. As described in the Regulatory Setting, the CARB Scoping Plan is a framework for achieving AB 32 and subsequent regulations, including SB 32, AB 1279, and EO B-55-18. While State programs including RPS, LCFS, Advanced Clean Cars, Cap-and-Trade, and others will help achieve the State’s near- and long-term climate change goals, local actions are more limited in scope and influence. As such, local jurisdictions are encouraged to adopt CAPs and use land use control to support electrifying transportation, reducing VMT, and decarbonizing buildings. The CARB 2022 Scoping Plan suggests that a project including all key project attributes in these categories would have a less-than-significant impact. Table 3.5-5 below assesses whether the Proposed Plan is consistent with these project attributes.

Table 3.5-5: Consistency with CARB 2022 Scoping Plan Key Residential and Mixed-Use Project Attributes to Reduce GHGs

<i>Key Project Attribute</i>	<i>Proposed Plan Programs/Policies</i>	<i>Consistent?</i>
Transportation Electrification		
Provides EV charging infrastructure that, at minimum, meets the most ambitious voluntary standard in the California Green Building Standards Code (CALGreen) at the time of project approval.	CALGreen is adopted into the Woodside Town Code (Chapter 150).	Yes
Reduction of Vehicle Miles Traveled (VMT)		
Is located on infill sites that are surrounded by existing urban uses and reuses or redevelops previously undeveloped or underutilized land that is presently served by existing utilities and essential public services (e.g., transit, streets, water, sewer).	Implementation of the Proposed Project would involve construction of smaller scale infill development in established residential neighborhoods and additional multi-family housing on four key sites. In coordination with these proposed land use patterns, Proposed Project Goal H1 would increase opportunities for ADU development, Policy H2.1b would encourage more SB9 units, and Goal H3 would support opportunities for high density housing.	Yes
Does not result in the loss or conversion of natural and working lands.	Buildout of the Proposed Project would involve construction of small-scale residential projects on vacant and underutilized properties with residential zoning, as well as higher density housing on four key sites. Areas with sensitive natural communities are located in the western part of the Planning Area. Implementation of the Proposed Project would result in single-family	No

Table 3.5-5: Consistency with CARB 2022 Scoping Plan Key Residential and Mixed-Use Project Attributes to Reduce GHGs

Key Project Attribute	Proposed Plan Programs/Policies	Consistent?
	residential development in these areas, which could result in the loss or conversion of natural lands.	
<p>Consists of transit-supportive densities (minimum of 20 residential dwelling units per acre), <u>or</u> Is in proximity to existing transit stops (within a half mile), <u>or</u> Satisfies more detailed and stringent criteria specified in the region’s SCS.</p>	<p>The Planning Area is a rural community characterized by low-density residential development, narrow roads, and hills and overall, the lack of frequent transit service to major regional destinations means. Therefore, this project attribute is not feasible for Woodside.</p> <p>Even so, infill development is encouraged under the Proposed Project (see above). Further, proposed Policy H2.1 provides opportunities for housing types along existing transit routes, and Program H2.1c requests the extension of public transit routes.</p>	Yes
<p>Reduces parking requirements by:</p> <ul style="list-style-type: none"> • Eliminating parking requirements or including maximum allowable parking ratios (i.e., the ratio of parking spaces to residential units or square feet); or • Providing residential parking supply at a ratio of less than one parking space per dwelling unit; or • For multifamily residential development, requiring parking costs to be unbundled from costs to rent or own a residential unit. 	<p>There are no proposed programs that reduce parking requirements. Given that the Planning Area is a rural community characterized by low-density residential development, narrow roads, and hills and overall, the lack of frequent transit service to major regional destinations means that current and future residents will need to rely on vehicles for a large portion of trips to and from Woodside.</p>	No
<p>At least 20 percent of units included are affordable to lower-income residents.</p>	<p>Implementation of the Proposed Project would result in 56 percent of proposed units (249 total units) that can accommodate low or very low-income residents.</p>	Yes
<p>Results in no net loss of existing affordable units.</p>	<p>Implementation of the Proposed Project would result in 56 percent of proposed units (249 total units) that can accommodate low or very low-income residents. Further, the Proposed Project also includes measures to preserve the existing housing stock, especially affordable units, such as</p>	Yes

Table 3.5-5: Consistency with CARB 2022 Scoping Plan Key Residential and Mixed-Use Project Attributes to Reduce GHGs

Key Project Attribute	Proposed Plan Programs/Policies	Consistent?
	by providing amnesty for unpermitted ADUs (Policy H1.3, Program d).	
Building Decarbonization		
Uses all-electric appliances without any natural gas connections and does not use propane or other fossil fuels for space heating, water heating, or indoor cooking.	The Proposed Plan does not include specific development projects, other than pipeline projects. Future development would comply with Housing Element Policy H6.3 and programs a and b that encourage energy efficiency, including compliance with the Solar Mandate, and green building practices beyond CALGreen requirements. However, such voluntary measures cannot be guaranteed at a project level.	No

Source: CARB 2022 Scoping Plan, Appendix D: Local Actions [Table 3], 2022.

As demonstrated above, the Proposed Plan supports many of the key project attributes but would conflict with the following three: Prevent loss/conversion of natural and working lands; eliminate parking requirements, reduce the ratio to less than one space per unit, or unbundle parking from housing costs; and use all-electric appliances with no natural gas consumption.

SB 375 and Plan Bay Area

Environment and transportation are two of four elements that are the focus of MTC’s Plan Bay Area 2050. Plan Bay Area 2050 is the MTC’s regional transportation plan and provides a long-range framework to minimize transportation impacts on the environment, improve regional air quality, protect natural resources, and reduce GHG emissions. The plan promotes infill development, and proactively links land use, air quality, and transportation needs in the region. Plan Bay Area is consistent with SB 375, which requires MTC to adopt an SCS that outlines policies to reduce per service population GHG emissions from automobiles and light trucks. As noted in the Regulatory Setting, for the San Francisco Bay Area, the per capita GHG emissions reduction target for automobiles and light trucks is 19 percent by 2035, relative to 2005 emissions. The SCS policies include a mix of strategies that encourage compact growth patterns, mixed-use design, alternative transportation, transit, mobility and access, network expansion, and transportation investment.

Implementation of the SCS is intended to improve the efficiency of the transportation system and achieve a variety of land use types throughout the Bay Area that meet market demands in a balanced and sustainable manner. The Project’s incorporation of multifamily housing sites with transit access and overall housing unit share in existing low-VMT areas is in line with the emission reduction objectives of Plan Bay Area 2050. Further, the 75 units for staff and students at Cañada College would reduce commute trip length, in line with Plan Bay Area 2050 objectives. Proposed multifamily projects and ADUs could provide housing options for teachers, retail/restaurant workers, and others employed in Woodside. Further, all new development would be focused within Town limit and would ensure the Town facilitates construction of its RHNA share. Therefore, the

Proposed Project is broadly consistent with key objectives and would not conflict with the goals of SB 375 Plan Bay Area 2050.

Consistency with Other State Regulations

As discussed above, systemic changes will be required at the state level to achieve California's future GHG reduction goals. Regulations, such as future amendments to the Low Carbon Fuel Standard (LCFS) and future updates to the State's Title 24 standards and implementation of the State's SLCP Reduction Strategy, including forthcoming regulations for composting and organics diversion, will be necessary to attain the magnitude of reductions required for the State's goals. Development pursuant to the Proposed Project would be required to comply with these regulations in new construction (in the case of updated Title 24 standards) or would be directly affected by the outcomes (vehicle trips and energy consumption would be less carbon intensive due to statewide compliance with future low carbon fuel standard amendments and increasingly stringent RPS). Thus, for the foreseeable future, the Proposed Project would not conflict with any other State-level regulations pertaining to GHGs in the post-2020 era.

Conclusion

Overall, the Proposed Plan would be generally consistent with policies and plans that encourage energy conservation, energy efficiency, and sustainability, as implementation would involve smaller-scale infill development in established residential neighborhoods and additional multi-family housing on four key sites to provide varied housing types. However, implementation of the Proposed Plan could result in GHG emissions that exceed targets established in State plans. While accommodating the City's assessed share of the regional housing need for the 2023-31 planning period is a legal requirement under State law, these exceedances nevertheless represent a conflict with plans, policies, and regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measures

Implementation of **Mitigation Measure GHG-1** would require future development projects to implement BAAQMD-recommended BMPs which would reduce the level of GHGs associated with construction of the future projects and avoid any conflict with statewide GHG reduction goals, thereby reducing this impact to less than significant with mitigation. Implementation of **Mitigation Measure GHG-2** would require the Town to update its CAP to identify measures necessary for compliance with State targets; however, as this update has not yet been completed and the specific measures have not yet been identified, the DEIR conservatively concludes that the associated impact would remain significant and unavoidable even after implementation of this mitigation measure. Therefore, the Proposed Project would result in a significant and unavoidable impact related to GHG plan/policy consistency.

MM-GHG-1: Require Implementation of BAAQMD-recommended BMPs.

MM-GHG-2: Update the Town of Woodside Climate Action Plan.

Significance After Mitigation: Significant and Unavoidable

3.6 Noise

This section assesses potential environmental impacts related to noise from future development under the Proposed Project, including those associated with noise standards, groundborne vibration, ambient noise levels, and airport noise. The section describes the characteristics, measurement, and physiological effects of noise and existing sources of noise in the Planning Area, as well as relevant federal, State, and local regulations and programs.

There were comments received during the Notice of Preparation (NOP) comment period related to noise, primarily what impacts could occur in the Town during the construction of proposed housing and traffic-related operational noise increases.

Environmental Setting

PHYSICAL SETTING

Noise

Noise Characteristics and Measurement

Because of the technical nature of noise and vibration impacts, a brief overview of basic noise principles and descriptors is provided below.

Sound can be described as the mechanical energy of a vibrating object transmitted by pressure waves through a liquid or gaseous medium (e.g., air). Noise is generally defined as unwanted sound (i.e., loud, unexpected, or annoying sound). Acoustics is defined as the physics of sound. In acoustics, the fundamental scientific model consists of a sound (or noise) source, a receiver, and the propagation path between the two. The loudness of the noise source and obstructions or atmospheric factors affecting the propagation path to the receiver determines the sound level and characteristics of the noise perceived by the receiver. Acoustics addresses primarily the propagation and control of sound.

Sound, traveling in the form of waves from a source, exerts a sound pressure level (referred to as sound level) that is measured in decibels (dB), which is the standard unit of sound amplitude measurement. The dB scale is a logarithmic scale that describes the physical intensity of the pressure vibrations that make up any sound, with 0 dB corresponding roughly to the threshold of human hearing and 120 to 140 dB corresponding to the threshold of pain. Pressure waves traveling through air exert a force registered by the human ear as sound.

Sound pressure fluctuations can be measured in units of hertz (Hz), which correspond to the frequency of a particular sound. Typically, sound does not consist of a single frequency, but rather a broad band of frequencies varying in levels of magnitude, with audible frequencies of the sound spectrum ranging from 20 to 20,000 Hz. The typical human ear is not equally sensitive to this frequency range. As a consequence, when assessing potential noise impacts, sound is measured using an electronic filter that deemphasizes the frequencies below 1,000 Hz and above 5,000 Hz in a manner corresponding to the human ear's decreased sensitivity to these extremely low and extremely high frequencies. This method of frequency filtering or weighting is referred to as A-weighting, expressed in units of A weighted decibels (dBA), which is typically applied to community noise measurements. Some representative common outdoor and indoor noise sources and their corresponding A-weighted noise levels are shown in Table 3.6-1.

An individual's noise exposure is a measure of noise over a period of time; a noise level is a measure of noise at a given instant in time. However, noise levels rarely persist at that level over a long period of time. Rather, community noise varies continuously over a period of time with respect to the sound sources contributing to the community noise environment. Community noise is primarily the product of many distant noise sources, which together constitute a relatively stable background noise exposure, with many of the individual contributors being unidentifiable. The background noise level changes throughout a typical day, but does so gradually, corresponding to the addition and subtraction of distant noise sources, such as changes in traffic volume. What makes community noise variable throughout a day, besides the slowly changing background noise, is the addition of short-duration, single-event noise sources (e.g., aircraft flyovers, motor vehicles, sirens), which are readily identifiable to the individual.

Table 3.6-1: Typical Noise Levels in the Environment

<i>Source of Noise</i>	<i>A-Weighted Sound Pressure Level in Decibels</i>
Civil Defense Siren (100 feet in distance between source and listener)	130
Jet Takeoff (200 feet in distance between source and listener)	129
Riveting Machine	115
Rock Music Band	110
Piledriver (50 feet in distance between source and listener)	105
Ambulance Siren (100 feet in distance between source and listener)	100
Boiler Room	90
Printing Press Plant	89
Freight Cars (50 feet in distance between source and listener)	88
Garbage Disposal in the Home	85
Pneumatic Drill (50 feet in distance between source and listener)	80
Inside Sports Car: 50 mph	79
Vacuum Cleaner (10 feet in distance between source and listener)	69
Data Processing Center	65
Department Store	61

<i>Source of Noise</i>	<i>A-Weighted Sound Pressure Level in Decibels</i>
Speech (1 foot in distance between source and listener)	60
Auto Traffic near Freeway	58
Typical Minimum Daytime Levels – Residential Areas	55
Private Business Office	52
Large Transformer (200 feet in distance between source and listener)	49
Light Traffic (100 feet in distance between source and listener)	48
Average Residence	42
Typical Minimum Nighttime Levels – Residential Areas	41
Soft Whisper	30
Rustling Leaves	21
Recording Studio	20
Mosquito	10

Notes:

1. 10 decibels is the Threshold of Hearing
2. 120 decibels is the Threshold of Pain

These successive additions of sound to the community noise environment change the community noise level from instant to instant, requiring the noise exposure to be measured over periods of time to legitimately characterize an existing community noise environment. The following noise descriptors are used to characterize environmental noise levels over time, which are applicable to the Project.

- L_{eq} : The equivalent sound level over a specified period of time, typically, one hour (L_{eq}). The L_{eq} may also be referred to as the average sound level.
- L_{max} : The maximum, instantaneous noise level experienced during a given period of time.
- L_{min} : The minimum, instantaneous noise level experienced during a given period of time.
- L_x : The noise level exceeded a percentage of a specified time period. For instance, L50 and L90 represent the noise levels that are exceeded 50 percent and 90 percent of the time, respectively.
- L_{dn} : The average A-weighted noise level during a 24-hour day, obtained after an addition of 10 dB to measured noise levels between the hours of 10:00 p.m. to 7:00 a.m. to account for nighttime noise sensitivity. The L_{dn} is also termed the day-night average noise level.
- CNEL: The Community Noise Equivalent Level (CNEL) is the average A-weighted noise level during a 24-hour day that includes an addition of 5 dB to measured noise levels between the evening hours of 7:00 p.m. to 10:00 p.m. and an addition of 10 dB to noise levels between the nighttime hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity in the evening and nighttime, respectively.

Physiological Effects of Noise

Noise is generally loud, unpleasant, unexpected, or undesired sound that is typically associated with human activity that is a nuisance or disruptive. The effects of noise on people can be placed into four general categories:

1. Subjective effects (e.g., dissatisfaction, annoyance)
2. Interference effects (e.g., communication, sleep, and learning interference)
3. Physiological effects (e.g., startle response)
4. Physical effects (e.g., hearing loss)

Although exposure to high noise levels has been demonstrated to cause physical and physiological effects, the principal human responses to typical environmental noise exposure are related to subjective effects and interference with activities. Interference effects interrupt daily activities and include interference with human communication activities, such as normal conversations, watching television, telephone conversations, and interference with sleep. Sleep interference effects can include both awakening and arousal to a lesser state of sleep (Caltrans, 2013a).

With regard to the subjective effects, the responses of individuals to similar noise events are diverse and influenced by many factors, including the type of noise, the perceived importance of the noise, the appropriateness of the noise to the setting, the duration of the noise, the time of day and the type of activity during which the noise occurs, and individual noise sensitivity. Overall, there is no completely satisfactory way to measure the subjective effects of noise, or the corresponding reactions of annoyance and dissatisfaction on people. A wide variation in individual thresholds of annoyance exists, and different tolerances to noise tend to develop based on an individual's past experiences with noise. Thus, an important way of predicting a human reaction to a new noise environment is the way it compares to the existing environment to which one has adapted (i.e., comparison to the ambient noise environment). In general, the more a new noise level exceeds the previously existing ambient noise level, the less acceptable the new noise level will be judged by those hearing it. With regard to increases in A-weighted noise level, the following relationships generally occur (Caltrans, 2013a):

- Except in carefully controlled laboratory experiments, a change of 1 dBA in ambient noise levels cannot be perceived;
- Outside of the laboratory, a 3 dBA change in ambient noise levels is considered to be a barely perceivable difference;
- A change in ambient noise levels of 5 dBA is considered to be a readily perceivable difference; and
- A change in ambient noise levels of 10 dBA is subjectively heard as a doubling of the perceived loudness.

These relationships occur in part because of the logarithmic nature of sound and the decibel scale. The human ear perceives sound in a non-linear fashion; therefore, the dBA scale was developed. Because the dBA scale is based on logarithms, two noise sources do not combine in a simple additive fashion, but rather logarithmically. Under the dBA scale, a doubling of sound energy corresponds

to a 3 dBA increase. In other words, when two sources are each producing sound of the same loudness, the resulting sound level at a given distance would be approximately 3 dBA higher than one of the sources under the same conditions. For example, if two identical noise sources produce noise levels of 50 dBA, the combined sound level would be 53 dBA, not 100 dBA. Under the dB scale, three sources of equal loudness together produce a sound level of approximately 5 dBA louder than one source, and ten sources of equal loudness together produce a sound level of approximately 10 dBA louder than the single source (Caltrans, 2013a).

Noise Attenuation

When noise propagates over a distance, the noise level reduces with distance at a rate that depends on the type of noise source and the propagation path. Noise from a localized source (i.e., point source) propagates uniformly outward in a spherical pattern, referred to as “spherical spreading.” Stationary point sources of noise, including stationary mobile sources such as idling vehicles, attenuate (i.e., reduce) at a rate between six dBA for acoustically “hard” sites and 7.5 dBA for “soft” sites for each doubling of distance from the reference measurement, as their energy is continuously spread out over a spherical surface (e.g., for hard surfaces, 80 dBA at 50 feet attenuates to 74 at 100 feet, 68 dBA at 200 feet, etc.). Hard sites are those with a reflective surface between the source and the receiver, such as asphalt or concrete surfaces or smooth bodies of water. No excess ground attenuation is assumed for hard sites and the reduction in noise levels with distance (drop-off rate) is simply the geometric spreading of the noise from the source. Soft sites have an absorptive ground surface, such as soft dirt, grass, or scattered bushes and trees, which in addition to geometric spreading, increase the ground attenuation value by 1.5 dBA (per doubling distance) (Caltrans, 2013a).

Roadways and highways consist of several localized noise sources on a defined path, and hence are treated as “line” sources, which approximate the effect of several point sources. Noise from a line source propagates over a cylindrical surface, often referred to as “cylindrical spreading.” Line sources (e.g., traffic noise from vehicles) attenuate at a rate between 3 dBA for hard sites and 4.5 dBA for soft sites for each doubling of distance from the reference measurement (Caltrans, 2013a). Therefore, noise due to a line source attenuates less with distance than that of a point source with increased distance.

Additionally, receptors located downwind from a noise source can be exposed to increased noise levels relative to calm conditions, whereas locations upwind can have lowered noise levels. Atmospheric temperature inversion (i.e., increasing temperature with elevation) can increase sound levels at long distances (e.g., more than 500 feet). Other factors such as air temperature, humidity, and turbulence can also have significant effects on noise levels (Caltrans, 2013a).

Noise-Sensitive Receptors

Many land uses are considered sensitive to noise. Noise-sensitive receptors are land uses associated with indoor and/or outdoor activities that may be subject to stress and/or significant interference from noise, such as residential dwellings, transient lodging, dormitories, hospitals, educational facilities, and libraries. Industrial and commercial land uses are generally not considered sensitive to noise. Special Status species and their habitat may also be considered noise sensitive. Existing

noise-sensitive receptors within the Planning Area include single- and multi-family residential housing, schools, parks, and libraries.

Existing Noise Conditions and Sources

The predominant source of noise in the Planning Area, as in most communities, is motor vehicles on roadways. Motor vehicle noise is of concern because it is characterized by a high number of individual events, which often create a sustained noise level, and because of its proximity to noise-sensitive uses. Roadways with the highest traffic volumes and speeds produce the highest noise levels. Interstate 280, Highway 84 (Woodside Road), Cañada Road, Portola Road, Whiskey Hill Road, and Sand Hill Road produce the most significant motor vehicle noise in the Planning Area.

The Planning Area does not have major stationary sources of noise, such as large factories. Noise sources in residential areas include generators, power mowers, leaf blowers, chain saws, air conditioners, swimming pool filters, animals, and sound amplifiers. Building construction creates noise from hammering, hand tools, power tools and earth-moving equipment.

Ground Vibration

Characterization and Measurement

While sound is the transmission of energy through the air, groundborne vibration is the transmission of energy through the ground or other solid medium and is perceived by humans as motion (of the ground, floor, or building). Vibrations can also generate noise by transmitting energy through the air.

Groundborne vibration can be quantified in two main ways. One commonly used descriptor is PPV, or Peak Particle Velocity. As seismic waves travel outward from a vibration source, they cause rock and soil particles to oscillate. The actual distance that these particles move is usually only a few ten-thousandths to a few thousandths of an inch. The rate or velocity (in inches per second) at which these particles move is the commonly accepted descriptor of the vibration amplitude, referred to as the peak particle velocity (PPV). This type of vibration will be discussed in more detail below under Construction Vibration.

Groundborne vibration can also be quantified by the root-mean-square (RMS) velocity amplitudes, which can be useful for assessing human annoyance. The RMS amplitude is expressed in terms of the velocity level in decibel units (VdB). The background vibration velocity level in residential areas is usually around 50 VdB or lower. The vibration velocity level threshold of perception for humans is approximately 65 VdB. Most perceptible indoor vibration is caused by sources within buildings, such as the operation of mechanical equipment, movement of people, or the slamming of doors. Typical outdoor sources of perceptible groundborne vibration are heavy construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the groundborne vibration from traffic is rarely perceptible.

Table 3.6-2 summarizes the typical groundborne vibration velocity levels and average human response to vibration that may be anticipated when a person is at rest in quiet surroundings. If the person is engaged in any type of physical activity, vibration tolerance increases considerably. The

duration of the event has an effect on human response, as does its daily frequency of occurrence. Generally, as the duration and frequency of occurrence increase, the potential for adverse human response increases.

Groundborne noise is a secondary component of groundborne vibration. When a building structure vibrates, noise is radiated into the interior of the building. Typically, this is a low-frequency sound that can be perceived as a low rumble. The magnitude of the sound depends on the frequency characteristic of the vibration and the manner in which the room surfaces in the building radiate sound. Groundborne noise is quantified by the A-weighted sound level inside the building. The sound level accompanying vibration is generally 25 to 40 dBA lower than the vibration velocity level in VdB. Groundborne vibration levels of 65 VdB can result in groundborne noise levels of up to 40 dBA, which can disturb sleep. Groundborne vibration levels of 85 VdB can result in groundborne noise levels of up to 60 dBA, which can be annoying to daytime noise-sensitive land uses such as schools (Federal Transit Administration, 2006).

Construction Vibration

As described above, vibration resulting from the operation of heavy construction equipment is often reported in PPV, which is the rate or velocity, in inches per second, at which rock and soil particles oscillate as seismic waves travel outward from a vibration source.

The operation of heavy construction equipment, particularly pile driving equipment and other impact devices (e.g., pavement breakers), creates seismic waves that radiate along the surface of and downward into the ground. These surface waves can be felt as ground vibration. Vibration from operation of this equipment can result in effects ranging from annoyance of people to damage of structures. Variations in geology and distance result in different vibration levels containing different frequencies and displacements. In all cases, vibration amplitudes decrease with increasing distance.

Perceptible groundborne vibration is generally limited to areas within a few hundred feet of construction activities. Vibration amplitude attenuates over distance and is a complex function of how energy is imparted into the ground and the soil or rock conditions through which the vibration is traveling. The following equation is used to estimate the vibration level at a given distance for typical soil conditions (Federal Transit Administration, 2006). PPV_{ref} is the reference PPV at 25 feet.

$$PPV = PPV_{ref} \times (25/Distance)^{1.5}$$

Table 3.6-2: Typical Levels of Groundborne Vibration

<i>Human or Structural Response</i>	<i>Vibration Velocity Level (VdB)</i>	<i>Typical Sources (50 feet from source)</i>
Threshold for minor cosmetic damage to fragile buildings	—100—	Blasting from construction project Bulldozer or heavy-tracked construction equipment
Difficulty in reading computer screen	—90—	Upper range of commuter rail
Threshold for residential annoyance for occasional events (e.g., commuter rail)	—80—	Upper range of rapid transit
Threshold for residential annoyance for frequent events (e.g., rapid transit)		Typical commuter rail Bus or truck over bump
	—70—	Typical rapid transit
Approximate threshold for human perception of vibration; limit for vibration-sensitive equipment		Typical bus or truck on public road
	—60—	
		Typical background vibration
	—50—	

Source: Federal Transit Administration, 2006.

Table 3.6-3 summarizes typical vibration levels generated by construction equipment (Federal Transit Administration, 2006) at the reference distance of 25 feet and other distances as determined using the attenuation equation above. Tables 3.6-4 and 3.6-5 summarize guidelines developed by the California Department of Transportation (Caltrans) for damage and annoyance potential from transient and continuous vibration that is usually associated with construction activity. Equipment or activities typical of continuous vibration include: excavation equipment, static compaction equipment, tracked vehicles, traffic on a highway, vibratory pile drivers, pile-extraction equipment, and vibratory compaction equipment. Equipment or activities typical of single-impact (transient) or low-rate repeated impact vibration include: impact pile drivers, blasting, drop balls, “pogo stick” compactors, and crack-and-seal equipment. Table 3.6-6 summarizes groundborne vibration criteria permissible for different land use categories provided by Caltrans.

Table 3.6-3: Vibration Source Levels for Construction Equipment

<i>Equipment</i>	<i>PPV at 25 Feet</i>	<i>PPV at 50 Feet</i>	<i>PPV at 75 Feet</i>	<i>PPV at 100 Feet</i>	<i>PPV at 175 Feet</i>
Pile driver (impact) ^a	0.65	0.230	0.125	0.081	0.035
Pile driver (sonic/vibratory) ^a	0.65	0.230	0.125	0.081	0.035
Hoe ram or large bulldozer	0.089	0.0315	0.0171	0.0111	0.0048
Large bulldozer	0.089	0.0315	0.0171	0.0111	0.0048
Loaded trucks	0.076	0.0269	0.0146	0.0095	0.0041
Jackhammer	0.035	0.0124	0.0067	0.0044	0.0019
Small bulldozer	0.003	0.0011	0.0006	0.0004	0.0002

Note:

a. The Caltrans Transportation and Construction Vibration Guidance Manual (Caltrans 2013b) is used as the source for vibration from a vibratory pile driver.

Source: Federal Transit Administration, 2006

Table 3.6-4: Vibration Damage Potential Threshold Criteria Guidelines

<i>Structure and Condition</i>	<i>Maximum PPV (inches/second)</i>	
	<i>Transient Sources</i>	<i>Continuous/Frequent Intermittent Sources</i>
Extremely fragile historic buildings, ruins, ancient monuments	0.1	0.1
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.3
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5

Notes:

Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

PPV = peak particle velocity.

Source: California Department of Transportation 2013b

Table 3.6-5: Vibration Annoyance Potential Criteria Guidelines

<i>Human Response</i>	<i>Maximum PPV (inches/second)</i>	
	<i>Transient Sources</i>	<i>Continuous/Frequent Intermittent Sources</i>
Barely perceptible	0.04	0.01
Distinctly perceptible	0.25	0.04
Strongly perceptible	0.9	0.10
Severe	2.0	0.4

Notes:

Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

PPV = peak particle velocity.

Source: California Department of Transportation 2013b.

Table 3.6-6: Groundborne Vibration Impact Criteria

<i>Land Use Category</i>	<i>Groundborne Vibration Impact Level (VdB)</i>		
	<i>Frequent Events^a</i>	<i>Occasional Events^b</i>	<i>Infrequent Events^c</i>
Category 1: Buildings where vibration would interfere with interior operations (research facilities, hospitals with vibration sensitive equipment)	65 ^d	65 ^d	65 ^d
Category 2: Residences buildings where people sleep	72	75	80
Category 3: Institutional land uses with primarily daytime uses (schools, churches)	75	78	83

Notes:

- Frequent Events* is defined as more than 70 vibration events of the same source per day. Most rapid transit projects fall into this category.
- Occasional Events* is defined as between 30 and 70 vibration events of the same source per day. Most commuter trunk lines have this number of operations.
- Infrequent Events* is defined as fewer than 30 vibration events of the same kind per day. This category includes most commuter rail branch lines.
- This criterion limit is based on levels that are acceptable for most moderately sensitive equipment, such as optical microscopes. Vibration-sensitive manufacturing or research may require detailed evaluation to define the acceptable vibration levels. Ensuring lower vibration levels in a building often requires special design of the heating, ventilation, and air-conditioning systems and stiffened floors.

N/A = not applicable

Source: California Department of Transportation 2013b.

REGULATORY SETTING

Federal Regulations

Environmental Protection Agency

Under the authority of the Noise Control Act of 1972, the United States Environmental Protection Agency (U.S. EPA) established noise emission criteria and testing methods published in Parts 201 through 205 of Title 40 of the Code of Federal Regulations (CFR) that apply to some transportation equipment (e.g., interstate rail carriers, medium trucks, and heavy trucks) and construction equipment. In 1974, USEPA issued guidance levels for the protection of public health and welfare in residential land use areas of an outdoor L_{dn} of 55 dBA and an indoor L_{dn} of 45 dBA. These guidance levels are not considered as standards or regulations and were developed without consideration of technical or economic feasibility.

Occupational Safety and Health Administration

Under the Occupational Safety and Health Act of 1970 (29 United States Code [U.S.C.] Section 1919 et seq.), the Occupational Safety and Health Administration (OSHA) has adopted regulations designed to protect workers against the effects of occupational noise exposure. These regulations list permissible noise level exposure as a function of the amount of time during which the worker is exposed. The regulations further specify a hearing conservation program that involves monitoring the noise to which workers are exposed, ensuring that workers are made aware of overexposure to noise, and periodically testing the workers' hearing to detect any degradation.

Department of Housing and Urban Development

The U.S. Department of Housing and Urban Development's environmental criteria and standards are presented in 24 Code of Federal Regulations (CFR) Part 51. New construction proposed in high noise areas (exceeding 65 dBA LDN) must incorporate noise attenuation features to maintain acceptable interior noise levels. A goal of 45 dBA LDN is set forth for interior noise levels and attenuation requirements are geared toward achieving that goal. It is assumed that with standard construction, any building will provide sufficient attenuation to achieve an interior level of 45 dBA LDN or less if the exterior level is 65 dBA LDN or less. Approvals in a "normally unacceptable noise zone" (exceeding 65 dB, but not exceeding 75 dB) require a minimum of 5dB of additional noise attenuation for buildings having noise sensitive uses if the LDN is greater than 65 dB, but does not exceed 70 dB, or a minimum of 10 dB of additional noise attenuation, if the day-night average is greater than 70 dB, but does not exceed 75 dB.

Federal Highway Administration

An assessment of noise and consideration of noise abatement per Title 23 of the CFR, Part 772, "Procedures for Abatement of Highway Traffic Noise and Construction Noise," is required for proposed federal or federal-aid highway construction projects on a new location, or the physical alteration of an existing highway that significantly changes either the horizontal or vertical

alignment, or increases the number of through-traffic lanes. The FHWA considers noise abatement for sensitive receivers, such as picnic areas, recreation areas, playgrounds, active sport areas, parks, residences, motels, hotels, schools, places of worship, libraries, and hospitals when “worst-hour” noise levels approach or exceed 67 dBA Leq. The California Department of Transportation (Caltrans) has further defined “approach” as meaning to be within 1 dB of the Noise Abatement Criteria (NAC).

State Regulations

State of California Noise Standards

The State of California does not have statewide standards for environmental noise, but the Governor’s Office of Planning and Research (OPR) has established general plan guidelines for evaluating the compatibility of various land uses as a function of community noise exposure. The purpose of these guidelines is to maintain acceptable noise levels in a community setting for different land use types. Noise compatibility by different land uses types is categorized into four general levels: “normally acceptable,” “conditionally acceptable,” “normally unacceptable,” and “clearly unacceptable.” For instance, a noise environment ranging from 50 dBA CNEL to 65 dBA CNEL is considered to be “normally acceptable” for multi-family residential uses, while a noise environment of 75 dBA CNEL or above for multi-family residential uses is considered to be “clearly unacceptable.”

In addition, California Government Code Section 65302 requires each county and city in the State to prepare and adopt a comprehensive long-range general plan for its physical development, with Section 65302(f) specifically requiring a noise element to be included in the general plan. The noise element must: (1) identify and appraise noise problems in the community and analyze and quantify current and projected noise levels; (2) show noise contours for noise sources stated in CNEL; (3) use noise contours as a guide for establishing a pattern of land uses; and (4) implement measures and possible solutions that address existing and foreseeable noise problems.

The State of California has also established noise insulation standards for new multi-family residential units, hotels, and motels that would be subject to relatively high levels of transportation-related noise. These requirements are collectively known as the California Noise Insulation Standards (Title 24, California Code of Regulations). The noise insulation standards set forth an interior standard of 45 dBA CNEL in any habitable room. They require an acoustical analysis demonstrating how dwelling units have been designed to meet this interior standard where such units are proposed in areas subject to noise levels greater than 60 dBA CNEL. Title 24 standards are enforced by local jurisdictions through the building permit application process.

Local Regulations

Town of Woodside Municipal Code (Town Code)

The Town of Woodside does not currently have a Noise Ordinance; however, the Woodside Municipal Code Sections 151.55.B (construction hours) and 151.55.D (amplified noise restrictions) limits construction hours (limited to Monday through Friday, 7:30 a.m. to 5:30 p.m., and Saturday 8:00 a.m. to 1:00 p.m.) unless additional hours are approved by the Town Engineer to prevent

unnecessary noise from construction. Additionally, projects requiring certain planning entitlements are required to comply with best management practices for controlling construction noise.

Town of Woodside General Plan 2012 (General Plan)

Table N3 in the Noise Element within the Town of Woodside General Plan 2012 specifies that the interior noise levels in residential buildings are to be reduced to 40 Ldn. This is more stringent than the California Building Code. Additionally, it requires ambient noise levels in exterior residential spaces (patios, swimming pools, tennis courts, etc.) not exceed 55 Ldn.

The Noise Element of the General Plan contains the following goal and policies associated with noise and vibration:

Goal N1: Protect, maintain, and improve the tranquil environment of the Town.

Policy N1.1 – Minimize Noise Disturbances. Activities taking place within the Town, within practical limits, shall be conducted so that the noise from individual identifiable sources shall not disturb the peace and quiet of any neighborhood.

Policy N1.2 – Review and Mitigate Noise Exposure on Residents. Minimize exposure to noise which diminishes the ability to enjoy a tranquil environment by utilizing the noise contour map, requiring acoustic analysis for projects exceeding thresholds, and reviewing siting of structures to be in accordance with thresholds.

Policy N1.3 - Review and Mitigate Noise Exposure Generated by New Development. Protect neighbors from exposure to noise generated from new development which diminishes the ability to enjoy a tranquil environment.

Policy N1.4 – Mitigate Vehicular Noise. Reduce the incidence and impact of vehicular noise by enforcing State and federal noise regulations, discouraging State highway or freeway projects that would increase noise levels, improving barriers between Interstate 280 and residential properties, and reducing vehicle trips.

Policy N1.5 – Minimize Aircraft Noise. Minimize the amount of noise generated by aircraft flying over the Town. Flight restrictions, strategic flight routes and altitudes, and cooperation with government agencies are examples of Town efforts.

Impact Analysis

SIGNIFICANCE CRITERIA

For the purposes of this EIR, a significant impact would occur if implementation of the Proposed Project would:

- Criterion 1:** Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;
- Criterion 2:** Generate excessive groundborne vibration or groundborne noise levels; or
- Criterion 3:** For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels.

METHODOLOGY AND ASSUMPTIONS

This analysis is based on noise modeling performed by Charles M. Salter Associates, informed by traffic modeling prepared by Parisi Transportation Consulting for the Proposed Project's study network, including data on traffic volumes, as well as on land use and roadway network changes assumed as part of the Proposed Project. For the purposes of this analysis, street traffic volumes are per traffic engineer data received in April 2023 and are considered the baseline that is compared to noise levels associated with implementation of the Proposed Project.

Construction Noise

Construction noise from development facilitated by the Proposed Project is estimated on the basis of noise levels for various pieces of construction equipment reported by the FTA's Noise and Vibration Impact Assessment (2018). It is assumed that construction equipment typically operates at approximately 25 feet from the nearest noise-sensitive receptors. Construction noise level estimates do not account for the presence of intervening structures or topography, which could reduce noise levels at receptor locations. New development facilitated by the Proposed Project would have a significant impact if temporary construction noise during permitted daytime hours could expose noise-sensitive receptors to significantly adverse noise levels, or if construction would not meet one of the standards in the Woodside Municipal Code Sections 151.55.B (construction hours) and 151.55.D (amplified noise restrictions for construction sites).

On-site Operational Noise

On-site activities at new development facilitated by the Proposed Project would have a significant impact if it would expose neighboring noise-sensitive land uses to noise levels exceeding the Town's standards in its General Plan or the Woodside Municipal Code Sections 151.55.B (construction hours) and 151.55.D (amplified noise restrictions for construction sites), as described above in Regulatory Setting.

Traffic Noise

Traffic-related noise impacts are evaluated using the FHWA Highway Traffic Noise Prediction Model (FHWA RD-77-108). This model requires various parameters, including traffic volumes, vehicle mix, vehicle speed, and roadway geometry to compute typical equivalent noise levels during daytime, evening, and nighttime hours. The resultant noise levels are weighted and summed over

24-hour periods to determine the CNEL values. The traffic volumes for each roadway segment will be used along with the FHWA Traffic Noise Model to calculate Ldn at a distance of 50 feet from the roadway centerlines for local roadways. Noise standards found in the Town of Woodside General Plan 2012 are used to evaluate potential traffic noise impacts in the Planning Area, as discussed above. According to the General Plan, traffic noise impacts require mitigation on the ambient noise level in the Town.

Stationary Noise

As noted above, this analysis evaluates impacts associated with the Proposed Project at the program level, given that specific details on future mechanical equipment or HVAC equipment and layout cannot be known at this time. Accordingly, the specific noise sources that might occur in conjunction with development of land uses allowable under the Proposed Project also cannot be known at this time. Therefore, stationary and other noise source impacts will be discussed on a qualitative basis, considering the potential for new noise sources to exceed established standards.

Groundborne Vibration

The Town has not adopted a significance threshold to assess vibration impacts during construction. The general human response to different levels of groundborne vibration velocity levels is described in Table 3.6-5. To determine vibration impacts during construction under the Proposed Project, vibration levels were calculated at vibration-sensitive receptors using VdB and compared to the FTA guidelines set forth in the FTA Transit Noise and Vibration Assessment (2018). The following vibration thresholds are established by the FTA for the disturbance of people:

- 65 VdB for buildings where low ambient vibration is essential for interior operations, such as hospitals and recording studios
- 72 VdB for residences and buildings where people normally sleep, including hotels
- 75 VdB for institutional land uses with primary daytime use, such as churches and schools

These thresholds apply to “frequent events,” which the FTA defines as vibration events occurring more than 70 times per day. The thresholds for frequent events are considered appropriate because of the scale and duration of the construction activity associated with the Proposed Project. In addition, this analysis applies the following FTA thresholds in Table 3.6-6 for potential structural damage to buildings from construction vibration.

IMPACTS

Impact 3.6-1 Implementation of the Proposed Project would not result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise

ordinance, or applicable standards of other agencies. (Less than Significant with Mitigation Incorporated)

Construction

Noise from individual construction projects carried out under the Proposed Project would likely result in temporary increases in ambient noise levels at 25 feet and at adjacent property lines. As the precise details and timeframes for individual development projects that would be carried out under the Proposed Project cannot be known at this time, it is not possible to determine exact noise levels, locations, or time periods for construction of such projects, or construction noise at adjacent properties. Buildout of the Proposed Project would involve construction of small-scale residential housing, typically of not more than three single-family residences or multi-family residential structures designed for not more than six dwelling units. Pursuant to CEQA Section 15303, the State has determined that such projects would not have a significant effect on the environment.

However, the Proposed Project does involve multifamily housing at 773 Canada Road, Raymundo Drive at Runnymede Road, High Road at Woodside Road, and Canada College, the construction of which could potentially expose existing sensitive noise receptors to sustained construction noise, including from construction-related traffic, demolition, and reconstruction activities. Table 3.6-7 illustrates typical noise levels associated with construction equipment at a distance of 25 feet. At a distance of 25 feet from the construction site, noise levels similar to those shown in Table 3.6-7 would be expected to occur with individual development projects. Noise would typically drop off at a rate of about 6 dBA per doubling of distance. Therefore, construction noise levels would be about 6 dBA lower than shown in the table at 50 feet from the noise source and 12 dBA lower at a distance of 100 feet from the noise source.

As shown in Table 3.6-7, noise levels from construction activity could approach 107 dBA Leq 25 feet from construction equipment, specifically from the operation of pile drivers. Pile foundations are generally used under two situations: 1) when there is a layer of weak soil at the ground surface that cannot support the weight of a building; or 2) when a building has very heavy, concentrated loads, such as in a high-rise structure, bridge, or water tank. The Proposed Project does not envision new infrastructure such as bridges and water tanks, nor the construction of high-rise buildings in the Planning Area, thus it is unlikely that pile drivers would be needed. Even so, other construction equipment, such as a backhoe which could approach 86 dBA Leq at 25 feet, would exceed the Land Use/Noise Compatibility Standards established in the Town's General Plan. For residential properties, this would exceed the Town's General Plan exterior noise standards for residential areas of 55 Ldn. Construction noise would exceed ambient noise levels and may temporarily disturb people at neighboring properties.

Table 3.6-7: Typical Noise Levels for Construction Equipment

<i>Estimated Noise Levels at Nearest Sensitive Receptors (dBA Leq)</i>			
<i>Equipment</i>	<i>25 feet</i>	<i>50 feet</i>	<i>100 feet</i>
Air Compressor	86	80	74
Backhoe	86	80	74
Concrete Mixer	91	85	79
Dozer	91	85	79
Grader	91	85	79
Jack Hammer	94	88	82
Loader	86	80	74
Paver	91	85	79
Pile-drive (Impact)	107	101	95
Pile-driver (Sonic)	101	95	89
Roller	91	85	79
Saw	82	76	70
Scarified	89	83	77
Scraper	91	85	79
Truck	90	84	78

Source: FTA, 2018.

The severity of construction-related noise impacts depends on the proximity of construction activities to sensitive receptors, the presence of intervening barriers, the number and types of equipment used, and the duration of the activity. While these factors cannot be known precisely for future projects under the Proposed Project, individual projects would be required to comply with Town standards. Per the Woodside Municipal Code Sections 151.55.B (construction hours) and 151.55.D (amplified noise restrictions), it is unlawful for any person or construction company within the Town limits to perform construction outside of the hours of Monday through Friday, 7:30 a.m. to 5:30 p.m., and Saturday 8:00 a.m. to 1:00 p.m. unless additional hours are approved by the Town Engineer to prevent unnecessary noise from construction. Additionally, projects requiring certain planning entitlements are required to comply with best management practices for controlling construction noise.

Nevertheless, construction of the multifamily projects would likely continue over a period of 18 to 24 months. Therefore, implementation of **Mitigation Measure N-1** is recommended, which would require best management practices that reduce noise impacts of larger construction projects to a less than significant level in accordance with General Plan standards. During the clearing, earth moving, grading, and foundation/conditioning phases of construction, **Mitigation Measure N-1** would require equipment staging areas located away from sensitive receptors, as well as the use of electrically-powered tools and smart back-up alarms. Further, the mitigation measure would require temporary sound barriers to be installed and maintained between the construction site and sensitive receptors. These sound barriers could consist of sound blankets affixed to construction fencing or temporary solid walls along all sides of the construction site boundary facing potentially sensitive receptors. Therefore, compliance with existing regulations and implementation of

Mitigation Measure N-1 would ensure that impacts related to construction noise would be less than significant.

On-Site Operational Noise

Residential development associated with the Proposed Project is not likely to generate noise levels that would exceed the Town’s standards. The noise generated by on-site activities for new development would be subject to the Town’s maximum allowable exterior noise levels, contained in the Town’s General Plan. The noise standard for exterior use areas (such as backyards) in residential areas is 55dB (decibels) Ldn (a day-night weighted 24-hour average noise level). Stationary noise sources at new residential and mixed-use development would include ventilation and heating (HVAC) systems. Residential developments that comply with these noise standards would result in less than significant noise impacts with regard to the generation of noise in excess of thresholds. Therefore, compliance with the requirements of the General Plan and Town Code would reduce potential on-site noise impacts to a less than significant level.

Traffic Noise

Future development associated with the Proposed Project would result in an increase in traffic in and adjacent to the Planning Area.

Traffic noise impacts along roadways and at intersections with adjacent existing sensitive receptors were analyzed using the Traffic Noise threshold discussed in the Methodology and Assumptions section on page 3.6-15. Under this threshold, the Town of Woodside General Plan states that traffic noise impacts require mitigation on the ambient noise level in the Town. Further, as noted in the Environmental Setting on page 3.6-5, a 3 dBA change in ambient noise levels is considered to be a barely perceivable difference. Thus, a change in ambient noise levels of less than 3 dB from traffic would not constitute a significant impact, because such a change in ambient noise levels is considered just noticeable.

As shown in Table 3.6-8, none of the roadway segments studied are projected to exceed a 3 dB increase in noise levels under the Proposed Project compared to existing conditions. As such, the increase in traffic under the Proposed Project is considered to be a less-than-significant noise impact and no mitigation is required.

Table 3.6-8: Projected Traffic Noise Increase

<i>Street</i>	<i>From</i>	<i>To</i>	<i>LDN Increase (dBA)</i>
Runnymede Road	Raymundo Drive	Cañada Road	<1
Cañada Road	Town Limit (North)	Runnymede Road	<1
Cañada Road	Runnymede Road	Woodside Road	<1
Portola Road	Family Farm Road	City Limit (South)	<1
Portola Road	Woodside Road	Mountain Home Road	<1
Mountain Home Road	Woodside Road	Portola Road	<1
Kings Mountain Road	Town Limit (North)	Woodside Road	<1
Tripp Road	Kinds Mountain Road	Woodside Road	<1

Table 3.6-8: Projected Traffic Noise Increase

Street	From	To	LDN Increase (dBA)
Elanor Drive	Southgate Drive	Stockbridge Ave	<1
Whiskey Hill Road	Woodside Road	Sand Hill Road	<1
Manzanita Way	Mountain Home Road	Sand Hill Road	<1
Woodside Road	Portola Road	Cañada Road	<1
La Honda Road	Skyline Boulevard	Portola Road	<1
Sand Hill Road	Portola Road	Whiskey Hill Road	<1
Woodside Road	I-280	Alameda de las Pulgas	<1
Woodside Drive	High Road	Fernside St	<1
Woodside Road	Cañada Road	I-280 Interchange	<1
Farm Hill Boulevard	Woodhill Drive	I-280 Interchange	<1

Source: Salter, 2023.

Mitigation Measures

MM-N-1: Construction Noise Reduction. For all construction projects of more than three single-family residences or multi-family residential structures with more than six dwelling units that are anticipated to exceed the exterior residential noise exposure threshold in residential areas of 55 dBA Ldn, the following mitigation would be required:

- **Equipment Staging Areas.** Equipment staging shall be located in areas that will create the greatest distance feasible between construction-related noise sources and noise-sensitive receptors.
- **Electrically-Powered Tools and Facilities.** Electrical power shall be used to run air compressors and similar power tools and to power any temporary structures, such as construction trailers or caretaker facilities.
- **Smart Back-up Alarms.** Mobile construction equipment shall have smart back-up alarms that automatically adjust the sound level of the alarm in response to ambient noise levels. Alternatively, back-up alarms shall be disabled and replaced with human spotters to ensure safety when mobile construction equipment is moving in the reverse direction.
- **Additional Noise Attenuation Techniques.** During the clearing, earth moving, grading, and foundation/conditioning phases of construction, temporary sound barriers shall be installed and maintained between the construction site and the sensitive receptors. Temporary sound barriers shall consist of sound blankets affixed to construction fencing or temporary solid walls along all sides of the construction site boundary facing potentially sensitive receptors.

Significance after mitigation: Less than significant.

Impact 3.6-2 Development under the Proposed Project would not generate excessive groundborne vibration or groundborne noise levels. (Less than Significant)

Construction Vibration

Construction of individual projects facilitated by the Proposed Project could intermittently generate groundborne vibration on and adjacent to construction sites. Buildings in the vicinity of a construction site respond to vibration with varying degrees ranging from imperceptible effects at the lowest levels, to low rumbling sounds and perceptible vibrations at minor levels, and up to minor damage at the highest vibration levels. Table 3.6-6 lists groundborne vibration levels from various types of construction equipment at various distances. However, the majority of development would primarily involve construction of small-scale infill housing, typically of not more than three single-family residences or multi-family residential structures designed for not more than six dwelling units. Pursuant to CEQA Section 15303, the State has determined that such projects would not have a significant effect on the environment. Larger scale construction, such as at Cañada College, would not utilize equipment needed for high-rise structures, such as pile drivers. Applicable construction equipment, such as a small bulldozer, could approach vibration levels of 0.003 PPV at a distance of 25 feet from the source and 0.0011 PPV at 50 feet.

Further, the Woodside Municipal Code Sections 151.55.B (construction hours) and 151.55.D (amplified noise restrictions) require that construction activities be limited to Monday through Friday, 7:30 a.m. to 5:30 p.m., and Saturday, 8:00 a.m. to 1:00 p.m., further reducing the potential for impacts related to excessive groundborne vibration.

Therefore, compliance with applicable Town Code policies and regulatory requirements, such as the construction hour restrictions, would ensure that construction vibration associated with development under the Proposed Project would be minimized to the maximum extent practicable and impacts would be less than significant.

Operational Vibration

Stationary Source Vibration

As development occurs, there is generally a potential for more operational vibration sources to be developed. However, implementation of the Proposed Project would not directly result in an increase of operational sources of vibration in the Planning Area given that construction would primarily involve small-scale infill housing. Due to the nature of development not typically involving large scale vibration generating equipment, stationary source vibration impacts associated with implementation of the Proposed Project would be less than significant.

Vibration from Vehicle Traffic

There would be an anticipated increase in traffic in the Planning Area associated with both the increase in density and intensity allowed under the Proposed Project and with regional increases in traffic generally (see Section 3.7: Transportation). Vibration resulting from vehicle traffic is generated primarily by heavy truck passage over discontinuities in the pavement (such as potholes,

bumps, and expansion joints). Groundborne vibration generated by traffic traveling on roadways is generally below the threshold of perception at adjacent land uses, unless there are severe discontinuities in the roadway surface. Therefore, vehicle traffic resulting from construction and operation of residential projects under the Proposed Project would not be anticipated to result in substantial or excessive groundborne vibration and impacts would be less than significant.

Mitigation Measures

None required.

Impact 3.6-3 The Proposed Project would not be located within the vicinity of a private airstrip or an airport land use plan or expose people residing or working in the Planning Area to excessive noise levels. (No Impact)

The Town of Woodside is not located within the vicinity of a private airstrip or airport land use plan, or where such a plan has not been adopted, is not located within two miles of a public airport or public use airport. The nearest airport is the San Carlos Airport located approximately nine miles north of the Planning Area. Therefore, future development consistent with the Proposed Project would not expose people residing or working in the project area to excessive noise levels, and no impact would occur.

Mitigation Measures

None required.

3.7 Transportation

This section evaluates the potential impacts to transportation that could arise from implementation of the Proposed Project. The analysis evaluates the possible impacts of the Proposed Project on Vehicle Miles Traveled (VMT), and determines if the Proposed Project would conflict with adopted policies, plans, and programs regarding public transit and bicycle and pedestrian facilities, substantially increase hazards due to a design feature or incompatible uses, or result in inadequate emergency access.

There were 17 responses to the Notice of Preparation (NOP) regarding topics covered in this section. The California Department of Transportation (Caltrans) provided a comment in support of development patterns that reduce VMT and stated that the Town is responsible for all Project mitigation. Other commenters expressed concern about development patterns that increase vehicular use and VMT, traffic, and roadway safety issues. These comments are addressed in this section and incorporated into the following analysis.

Environmental Setting

PHYSICAL SETTING

Circulation Network

Regionally, Interstate 280 (I-280) is a major freeway that functions as one of the primary north-south routes in the Bay Area, connecting San Francisco to San Jose. I-280 runs through the eastern portion of the Town, while State Route 84 (SR-84) passes through the center, connecting Woodside to Redwood City. Skyline Boulevard (State Route 35) moves through the southern portion of Town.

Locally, Woodside Road (SR-84), runs through the Town of Woodside, from Woodside Road and La Honda Road, between Alameda de Las Pulgas at the east and Skyline Blvd at the west, and serves as the major arterial road in Woodside. Arterial roads are built for through traffic with limited direct access to abutting properties, such as Cañada Road, Sand Hill Road, Whiskey Hill Road, and Alameda de las Pulgas. Collector roads are local roads whose primary function is to collect and distribute traffic to a neighborhood, such as Jefferson Avenue, Mountain Home Road, Old La Honda Road, Summit Springs Road, Tripp Road, and Woodside Drive/High Road.

Vehicle Miles Traveled

One performance measure used to quantify automobile travel is VMT, which refers to the amount of automobile travel attributable to a project as well as the distance traveled. In 2013, Governor

Brown signed Senate Bill (SB) 743, which added Public Resources Code Section 21099 to the California Environmental Quality Act (CEQA). Public Resources Code Section 21099 changes the way transportation impacts are analyzed in transit priority areas, and aligns local environmental review methodologies with statewide objectives to reduce greenhouse gas (GHG) emissions, encourage infill mixed-use development in designated priority development areas, reduce regional sprawl, and reduce VMT in California.

Increased VMT leads to various direct and indirect impacts on the environment and human health. Among other effects, increased VMT on the roadway network leads to increased emissions of air pollutants, including GHGs, and increased energy consumption. The transportation sector is associated with more GHG emissions than any other sector in California. As documented in the Town of Woodside Climate Action Plan, about 11.6 percent of the Town's GHG emissions are produced by transportation on local roads and 62.5 percent are produced by transportation on State highways. Reducing VMT is one of the most effective means for reducing the Town's GHG emissions. VMT is typically an output from travel demand models. Its calculation is based on the estimated number of vehicles multiplied by the distance traveled by each vehicle. This analysis uses the following VMT metrics:

- **Household VMT per capita**, which measures all the VMT by motor vehicle on a typical weekday associated with a residential use, such as trips to work, school, or shop, and divides that VMT by the number of residents in the Planning Area.

The VMT forecasts generated for this CEQA assessment were produced using the C/CAG VMT Estimation Tool, which is underpinned by the C/CAG-VTA travel forecasting model. The base model structure was developed by the Metropolitan Transportation Commission (MTC) and was further refined to represent a more detailed reflection of the circulation network and land use patterns in San Mateo County. This model utilizes socioeconomic inputs aggregated into geographic areas called transportation analysis zones (TAZ) to derive VMT estimates. The model can output VMT according to the metric applied by the jurisdiction for impact analysis. For residential land uses in Woodside, VMT is expressed as home-based VMT per resident. Town average VMT was calculated based on VMT estimates from the C/CAG-VTA travel demand model. Overall baseline Woodside residential VMT was calculated as 26.0 daily home-based VMT per resident in 2020. The TAZ corresponding to portions of Woodside west of Cañada Road / Whiskey Hill Road currently exhibits VMT above the Town average (32.2 compared to 26.0 home-based VMT per resident), while the portions of Woodside east of Cañada Road / Whiskey Hill Road all generate less VMT than the Town average.

Existing Transit System

The private automobile is used by most Woodside residents for transportation because of the lack of access to public transit. The rural nature of the community (the low-density residential development and narrow roads) discourages a public transit system from extending service into the community. For some residents, however, such as the young, elderly, and physically impaired, transit services are helpful or necessary.¹ Regionally, transit service is provided by San Mateo

¹ Town of Woodside. 2012. Town of Woodside General Plan 2012. Available:
<https://www.woodsidetown.org/318/General-Plan-2012>. Accessed: February 15, 2024.

County Transit District (SamTrans), which operates bus service on two routes: Route 278 from Cañada College to Redwood City Transit Center, and Route 87 Woodside High to Portola Valley, which connects to Route 278.

Existing Bicycle System

As detailed in the Town of Woodside General Plan, bikeways in the Woodside Planning Area include Class II and Class III bikeways. There are currently no Class I bikeways (bike paths) within the Town of Woodside. These distinct bikeway facilities are defined below.

- Class I Bikeway—Typically called a “multi-use path,” a Class I bikeway provides bicycle and pedestrian travel on a paved right-of-way completely separated from any street or highway.
- Class II Bikeway —Often referred to as a “bicycle lane,” a Class II bikeway provides a striped and stenciled lane for one-way travel on a street or highway.
- Class III Bikeway —Generally referred to as a “bicycle route,” a Class III bikeway provides for shared use with motor vehicle traffic and is identified only by signing and/or pavement marking stencils.

The following arterial roads currently have Class II bikeways (bike lanes) within the Woodside Planning Area:

- Alameda de las Pulgas
- Cañada Road
- Kings Mountain Road (Woodside Road to Manuella Avenue)
- Portola Road (Sand Hill Road to Portola Valley Boundary)
- Sand Hill Road
- Whiskey Hill Road
- Woodside Road (Alameda de las Pulgas to Kings Mountain Road)

In addition to several collector and minor rural roads, the following arterial roads are designated as Class III bikeways (bike routes) within the Woodside Planning Area.

- Kings Mountain Road (Manuella Avenue to Town Boundary)
- La Honda Road
- Portola Road (Sand Hill Road to Woodside Road/La Honda Road)
- Skyline Boulevard
- Woodside Road (Kings Mountain Road to La Honda Road)

Existing Pedestrian System

Pedestrian ways in Woodside include pedestrian pathways located within road rights-of-way and off-road pedestrian trails. Existing pedestrian pathways function primarily as linkages to the Town Center and linkages between neighborhoods. Due to the topography of Woodside, it is not possible to provide pedestrian pathways along every roadway. Many roads are steep, narrow, winding, and do not provide adequate lighting, and therefore should not have pedestrian pathways. Priority is given to pedestrian pathways around and within the Town Center, and within neighborhoods with developable rights-of-way.

Planned Transportation Network Improvements

Several improvements are planned for bicycle and pedestrian travel within the Planning Area as described below and detailed in the Town's General Plan. There are no specific planned roadway improvements according to the General Plan. As outlined in Policy CL3.3, desired bikeways in Town include, but are not limited to, the following locations:

1. Town Center: The update of the Town Center Plan should include a comprehensive analysis of the rights-of-way (a plan line) from the Town Center to the public and private institutions on Woodside Road to the west (the Woodside Elementary School, library, church and fire station), and include plans for improvements to bikeways where feasible.
2. Bikeways connections are desired between and along the following roads, and to the following facilities:
 - Barkley Fields and Park
 - Edgewood Road and Edgewood Park to Huddard Park and Skyline
 - Farm Hill Boulevard to Cañada Road
 - Harcross Road to Cinnabar Road
 - Ridgeway Road to Farm Hill Boulevard
 - Sand Hill Road to Quail Meadows Road west of I-280
 - Tripp Road to Kings Mountain Road (near Manuella Avenue)

According to Policy CL5.3, desired pedestrian ways in Town include, but are not limited to, the following locations:

1. Town Center: The update of the Town Center Plan shall include a comprehensive analysis (a plan line) of the rights-of-way from the Town Center to the public and private institutions on Woodside Road to the west (the Woodside Elementary School, library, church and fire station), and include plans for improvements to pedestrian pathways where feasible. The highest priority will be given to the construction of new pedestrian pathways within a two-mile walking distance of these areas.
2. Pedestrian Connectivity: Pedestrian links are desirable between and along the following roads and facilities:
 - Barkley Fields and Park
 - Farm Hill Boulevard to Cañada Road
 - Ridgeway Road to Farm Hill Boulevard
 - Tripp Road to Kings Mountain Road (near Manuella Avenue)

REGULATORY SETTING

State

Senate Bill 743

SB 743 has changed the way transportation impact analysis is conducted as part of CEQA compliance. With these changes, automobile delay, level of service (LOS), and other similar measures of vehicular capacity or traffic congestion would no longer be the basis for determining significant impacts under CEQA. According to SB 743, these changes are intended to “more

appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions.”

In December 2018, the Governor’s Office of Planning and Research (OPR) completed an update to the CEQA Guidelines to implement the requirements of SB 743. The guidelines state that VMT must be the metric used to determine significant transportation impacts. The guidelines require all lead agencies in California to use VMT-based thresholds of significance in CEQA documents published after July 2020.

Regional

Metropolitan Transportation Commission (MTC)

Most of the federal, State, and local financing available for transportation projects is allocated at the regional level by MTC, the transportation planning, coordinating, and financing agency for the nine-county Bay Area. Integrated with the Association of Bay Area Government’s (ABAG’s) regional land use plan, the current regional transportation plan, Plan Bay Area 2050, was adopted by MTC and ABAG in October 2021. Plan Bay Area 2050 is both the Bay Area’s Regional Transportation Plan (RTP) as well as its Sustainable Communities Strategy (SCS). Plan Bay Area grew out of “The California Sustainable Communities and Climate Protection Act of 2008,” which requires each of the State’s 18 metropolitan areas to reduce GHG emissions from cars and light trucks. Accordingly, Plan Bay Area 2050 recommends increasing non-auto travel mode share and reducing VMT per capita and per employee through promoting transit-oriented development, as well as investments in transit and active transportation modes. These strategies seek to not only improve mobility within the region, but also reduce regional and statewide GHG emissions.

San Mateo C/CAG

As the designated Congestion Management Agency for San Mateo County, C/CAG is primarily responsible for administering the State-mandated Congestion Management Program (CMP). C/CAG is also responsible for preparing the Countywide Transportation Plan, which establishes a long-range transportation vision for the county and informs the *Regional Transportation Plan and Sustainable Communities Strategy* prepared by the MTC and ABAG. C/CAG also partners with local jurisdictions and other transportation agencies to develop transportation plans and studies for areas and projects with countywide and regional significance.

Local

Town of Woodside General Plan 2012 (General Plan)

The Town of Woodside General Plan 2012 (General Plan) includes the following goals and policies associated with transportation:

Goal CL1: Balance circulation system user needs.

Policy CL1.1: Encourage cooperation between all users of the circulation system.

Policy CL1.2: Expand the Road Program.

Policy CL1.3: Promote neighborhood safety and tranquility.

Policy CL1.4: Improve commercial district circulation, traffic flow, and parking.

Policy CL1.5: Seek and maintain funding and resources.

Policy CL1.6: Collect data.

Goal CL2: Maintain a safe and convenient roadway system while preserving the Town's rural and scenic environment.

Policy CL2.1: Maintain and improve Town roadways.

Policy CL2.2: Protect and designate scenic corridors.

Goal CL3: Protect, maintain, and expand the bikeway network.

Policy CL3.1: Enhance Town bikeways.

Policy CL3.2: Protect and expand Town bikeways.

Policy CL3.3: Plan and prioritize bikeway improvements, construction, and maintenance while balancing the needs of other users.

Goal CL5: Protect, maintain, and expand pedestrian pathways and trails.

Policy CL5.1: Enhance Town pedestrian pathways and trails.

Policy CL5.2: Protect and expand Town pedestrian pathways and trails.

Policy CL5.3: Plan and prioritize pathway maintenance, improvements, and construction.

Goal CL6: Develop a circulation system that encourages and supports vehicle trip reduction.

Policy CL5.1: Support regional transit connectivity.

Policy CL5.2: Encourage trip reduction.

Town of Woodside Municipal Code (Town Code)

Chapter 34, Article III outlines the Town's Road Program. The Road Program is updated annually to address the needs for road repair in the Town on a prioritized basis. Priorities of the program include volume of traffic, road user safety, road failure, emergency vehicle access and residential evacuation, the wishes and priorities of the neighborhood in which the road is located, and the number of homes served by the road. Chapter 152 of the Town Code also provides road pattern and design guidelines for subdivision developments. The road pattern in the land

division or subdivision shall be in conformity with the Circulation Element of the General Plan and shall be designed to take into consideration the potential development of adjoining areas. Great care shall be exercised to create curvilinear roads which blend and harmonize with the natural surroundings. Aesthetics and safety shall be considered.

Section 153.410 provides development regulations for the Town's hillside areas. One such purpose of the regulations is to provide a safe means of ingress and egress for vehicular circulation to and within hillside areas while at the same time minimizing the scarring effects of hillside road and driveway construction. In 2012, the Town of Woodside adopted Residential Design Guidelines to advise homeowners and designers about ways to locate and design development that maintains the character of the community and the natural setting. According to the guidelines, driveways, garages, parking areas, trails, and pathways shall be located and designed to be safe, minimally visible from the roadway, and subordinate to the site's natural features. Any development should provide safe vehicular, pedestrian, and equestrian access to the site.

Impact Analysis

SIGNIFICANCE CRITERIA

Based on the findings of the Initial Study circulated with the Notice of Preparation, it was determined that impacts related to the following criteria would be less than significant: substantially increase hazards due to a geometric design feature or incompatible uses, as well as result in inadequate emergency access. Accordingly, these criteria are not analyzed further here. The Initial Study is included in Appendix A.

For the purposes of this EIR, a significant impact would occur if the Proposed Project would:

- Criterion 1: Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, and bicycle and pedestrian facilities; or**
- Criterion 2: Conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b).**

ASSUMPTIONS AND METHODOLOGY

This section describes the methodology for VMT forecasts developed for this transportation assessment and used as supporting data for other assessments in the CEQA document including the GHG assessment. The new CEQA Guidelines Section 15064.3(b)(4) establishes that the lead agency has discretion to choose the most appropriate methodology to evaluate a project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may use models to estimate a project's vehicle miles traveled and may revise those estimates to reflect professional judgment based on substantial evidence.

The VMT forecasts generated for this CEQA assessment were produced using the C/CAG VMT Estimation Tool, which is underpinned by the C/CAG-VTA travel forecasting model. The base model structure was developed by the Metropolitan Transportation Commission (MTC) and was further refined to represent a more detailed reflection of the circulation network and land use

patterns in San Mateo County. This model utilizes socioeconomic inputs aggregated into geographic areas called transportation analysis zones (TAZ) to derive VMT estimates. The model can output VMT according to the metric applied by the jurisdiction for impact analysis. For residential land uses in Woodside, VMT is expressed as home-based VMT per resident. Appendix G includes the VMT forecast methodology and impact assessment performed by Parisi Transportation Consulting for the Proposed Project.

RELEVANT PROPOSED GOALS AND POLICIES

Policy H2.1 Provide Opportunities for Varied Housing Types with Access to High Resource Areas Amenities (schools, libraries, retail, restaurants, and services), and Transit Routes, including Bus Stops, Designated Bicycle Lanes, and Safe Routes to School Pathways.

Policy H3.1 Support New Student, Faculty, and/or Staff Housing at Cañada College.

Policy H3.2 Rezone Properties Allowing Increased Housing Density.

IMPACTS

Impact 3.7-1 Implementation of the Proposed Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, and bicycle and pedestrian facilities (Less than Significant)

New residential development under the Proposed Project would typically be expected to result in additional vehicular trips and the increased use of streets by all modes of transportation. Applicable local regulations and plans related to transportation include Plan Bay Area 2050, C/CAG Congestion Management Program, the Town's General Plan, and the Town Code. Implementation of the Proposed Project would involve construction of up to 423 housing units, including smaller scale infill development in established residential neighborhoods and additional multi-family housing on four key sites to provide varied housing types. Smaller-scale development includes single-family residences and development of accessory dwelling units (ADUs) on vacant and underutilized properties with residential zoning.

Regionally, the Metropolitan Transportation Commission (MTC) and Association of Bay Area Governments (ABAG) adopted Plan Bay Area 2050 as the official regional long-range transportation and land use plan for the Bay Area.² Strategies in Plan Bay Area 2050 include encouraging land use patterns that foster shared transportation modes, lessen the share of single-occupancy work commutes, and reduce greenhouse gas emissions. The Project's incorporation of multifamily housing sites with transit access and overall housing unit share in existing low-VMT areas is in line with the emission reduction objectives of Plan Bay Area 2050. The Proposed Project has identified parcels for high density multi-family housing at Cañada College (Policy H3.1). These 75 units for staff and students at Cañada College would reduce commute trip length, in line with

² Metropolitan Transportation Commission and Association of Bay Area Governments, *Plan Bay Area 2050, A Vision for the Future*. Adopted October 2021.

Plan Bay Area 2050 objectives. Proposed multifamily projects and ADUs could provide housing options for teachers, retail/restaurant workers, and others employed in Woodside. Further, all new development would be focused within Town limits and would ensure the Town facilitates construction of its RHNA share. Therefore, the Proposed Project is broadly consistent with key objectives and would not conflict with Plan Bay Area 2050.

In addition, the C/CAG Congestion Management Program (CMP) describes strategies to assess and monitor the performance of the county's transportation system, address congestion, and improve performance of a multimodal system among local jurisdictions.³ The policy for land use projects applies to developments that generate more than 100 daily vehicle trips on the CMP roadway network to develop TDM measures to reduce vehicle trips. Future projects within the Proposed Project that generate more than 100 daily trips would be obliged to comply with C/CAG CMP requirements, and no conflicts would occur.

Locally, the Woodside General Plan includes various goals and policies that address the Town roadway network, traffic, and other transportation facilities. The Circulation Element includes goals for development of a circulation system that balances system user needs (Goal C1), maintains safe roadways (Goal C2), expands the bikeway network and pedestrian pathways (Goals C3 and C5), and encourages and supports vehicle trip reduction (Goal C6).

The Town Code also provides road patterns and design guidelines for developments. According to Chapter 152, the road pattern in the land division or subdivision shall be in conformity with the Circulation Element of the General Plan and shall be designed to take into consideration the potential development of adjoining areas. Section 153.410 provides development regulations for the Town's hillside areas. One such purpose of the ordinance is to provide a safe means of ingress and egress for vehicular circulation to and within hillside areas while at the same time minimizing the scarring effects of hillside road and driveway construction. Further, the Town of Woodside adopted Residential Design Guidelines that promote driveways, garages, parking areas, trails, and pathways to be located and designed to be safe, minimally visible from the roadway, and subordinate to the site's natural features. The guidelines also seek to promote safe vehicular, pedestrian, and equestrian access throughout the Town.

New development under the Proposed Project would be required to comply with the above-listed General Plan policies and Town Code regulations. As a result, future development consistent with the Proposed Project would not conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Therefore, adoption of the Proposed Project and compliance with existing regulations would result in a less-than-significant impact related to conflicts with programs, plans, ordinances, and policies addressing the circulation system.

Mitigation Measures

None required.

³ City/County Association of Governments of San Mateo County, *Congestion Management Program*. December 2021.

Impact 3.7-2 Implementation of the Proposed Project would conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). (Significant and Unavoidable with Mitigation Incorporated)

CEQA Guidelines Section 15064.3 implements SB 743, stipulating that the congestion metric LOS cannot be used for evaluating environmental impacts. OPR’s Technical Advisory provides further guidance for implementing Section 15064.3 of the CEQA Guidelines related to VMT. For residential projects, OPR recommends that VMT per capita should be used as the metric to determine whether a proposed project may cause a significant transportation impact. For the purposes of this EIR, based on CEQA and OPR guidance, VMT impacts would be significant if buildout of the Proposed Project would result in VMT exceeding the following threshold:

- Future (2031) Home-based VMT per capita exceeds 15 percent below baseline (2020) average Town VMT per resident

As displayed in Table 3.7-1, buildout of the Project would result in daily home-based VMT per resident of 24.8 in 2031, which represents a reduction of 4.6 percent from the baseline Town average of 26.0. This reduction would be primarily due to the fact that planned multifamily housing developments are generally located in TAZs that exhibit VMT per resident at rates lower than the Town average, and due to the specific circumstances of Cañada College student housing, whose residents would be located in close proximity to college facilities and would generate less and shorter vehicle trips than the average Town resident. Nevertheless, while implementation of the Project would reduce home-based VMT in comparison to baselines conditions, Project-generated home-based VMT per resident would still be higher than the threshold of significance (22.1), resulting in a potentially significant impact.

Table 3.7-1: Project Generated VMT, Unmitigated

Scenario	Description	Home-Based VMT Per Resident	Change from Town Average	Below Threshold of Significance?
Existing (2020)	Town Average Baseline VMT	26.0	-	-
Threshold of Significance	15% Below Town Average VMT	22.1	-15.0%	-
Cumulative (2031)	Project Generated VMT	24.8	-4.6%	No

Notes: All VMT figures reflect home-based VMT per resident. Adopted threshold of significance is equivalent to 15% below Town average.

Source: C/CAG-VTA Travel Model, Parisi Transportation Consulting, 2023.

Strategies in the Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity, California Air Pollution Control Officers Association (CAPCOA), December 2021, could potentially serve as mitigation measures. This handbook is intended to quantify the effect of GHG and VMT reduction practices for local governments, communities, and private developers. CAPCOA identifies strategies related to: infill intensification, employment-based transportation demand management (TDM), parking demand management, non-motorized transportation incentives, and transit service enhancements.

Relevant mitigation measures, types of actions involved, and quantified VMT reduction potential for each group of strategies are detailed in Table 3.7-2.

All development pursuant to the Proposed Project would occur within the Town limits and much of it would be on vacant and underutilized sites in established residential neighborhoods. Additionally, the development of 75 new housing units for students and faculty at Canada College would reduce the need for those residents to travel by car to the College. Implementation of these infill strategies has been accounted for in VMT forecasts produced with the C/CAG VMT Estimation Tool, described earlier.

Table 3.7-2: CAPCOA Mitigation Measures to Reduce VMT

<i>Mitigation Measure</i>	<i>Type of Actions</i>	<i>VMT Mitigation Potential</i>
Infill intensification strategies	Increase residential density	≤ 30.0%
	Increase job density	≤ 30.0%
	Provide transit-oriented development	≤ 31.0%
	Improve street connectivity	≤ 30.0%
Employer-based TDM strategies	Implement commute trip reduction program (Voluntary)	≤ 4.0%
	Implement commute trip reduction program (Mandatory)	≤ 26.0%
	Implement commute trip reduction marketing	≤ 4.0%
	Provide ridesharing program	≤ 8.0%
	Implement subsidized or discounted transit program	≤ 5.5%
	Provide end-of-trip bicycle facilities	≤ 4.4%
	Provide employer-sponsored vanpool	≤ 20.4%
	Price workplace parking	≤ 20.0%
	Implement employee parking cash-out	≤ 12.0%
Provide community-based travel planning	≤ 2.3%	
Parking demand management strategies	Provide electric vehicle charging infrastructure	≤ 11.9%
	Limit residential parking supply	≤ 13.7%
	Unbundle residential parking costs from property costs	≤ 15.7%
	Implement market price public parking (on-street)	≤ 30.0%
Non-motorized transportation incentives	Provide pedestrian network improvement	≤ 6.4%
	Construct or improve bike facility	≤ 0.8%
	Construct or improve bike boulevard	≤ 0.2%
	Expand bikeway network	≤ 0.5%
	Implement conventional carshare program	≤ 0.15%
	Implement electric carshare program	≤ 0.18%
	Implement pedal (non-electric) bikeshare program	≤ 0.02%
Implement electric bikeshare program	≤ 0.06%	

Mitigation Measure	Type of Actions	VMT Mitigation Potential
	Implement scootershare program	≤ 0.07%
Transit service enhancements	Extend transit network coverage or hours	≤ 4.6%
	Increase transit service frequency	≤ 11.3%
	Implement transit-supportive roadway treatments	≤ 0.6%
	Reduce transit fares	≤ 1.2%

Source: CAPCOA, 2021.

As described above, transit service is provided by San Mateo County Transit District (SamTrans). As such, the Town does not have the legal authority to implement strategies that involve transit service enhancements, including increasing transit frequency, providing transit discounts to incentivize ridership, extending transit hours, and reducing transit fares. Further, even with the addition of new housing as envisioned under the Proposed Project, densities in Woodside would not be sufficient to support frequent transit service and transit discounts and reduced fares would not likely result in substantial VMT reduction. Therefore, transit service enhancements do not represent a feasible mitigation option.

Parking demand management strategies, which involve reducing or eliminating parking requirements or increasing the cost of parking as a way of shifting trips away from vehicles to other modes of travel, can also be effective in reducing VMT; however, such strategies are typically most effective in dense, urban areas with a range of multi-modal transportation options that offer viable alternatives to vehicle trips. The Planning Area is a rural community characterized by low-density residential development, narrow roads, and hills and overall, the lack of frequent transit service to major regional destinations means that current and future residents will need to rely on vehicles for a large portion of trips to and from Woodside. As such, mitigation involving additional parking demand management strategies would not substantially reduce per capita VMT. Similarly, VMT reduction strategies involving physical improvements to the transportation network, such as improving street connectivity or enhancing the pedestrian network would also not substantially reduce per capita VMT in Woodside for the same reason. The purpose of CEQA is to focus on “feasible” mitigation measures or alternatives that would “substantially lessen” significant effects on the environment. (Pub. Res. Code § 21002; CEQA Guidelines § 15021(a)(2).) Because parking demand management strategies and infrastructure construction do not fall within this category, they do not represent feasible mitigation options.

Employer-based transportation demand management (TDM) strategies, which reduce reliance on single-occupancy vehicles by encouraging alternative modes of travel, can be effective in reducing VMT because the commute to work is a significant contributor to home-based VMT. Employer-based TDM programs are often the most effective means of reducing trips, while area-wide programs are less likely to result in large reductions in commute trips because they must accommodate greater diversity in the factors that influence commuters’ choice of travel mode. Examples of employer based TDM strategies include promoting carpooling and ride sharing; providing employee shuttles; providing amenities such as showers, lockers, and bicycle racks to encourage cycling; offering transit incentives; and permitting compressed work schedules and telecommuting. Nearly 95 percent of employed Woodside residents commute to jobs in other

communities, including Redwood City (11.8 percent), San Mateo (6.6 percent), San Jose (5.8 percent), San Francisco (5.5 percent), Menlo Park (2.6 percent), Mountain View (2.4 percent), Sunnyvale (2.2 percent), and Belmont (2.1 percent). Since employers are predominantly located outside of Woodside, the Town does not have the legal authority to require employer-based TDM programs, and further, given that employed residents commute to many different communities for work, the effectiveness of many of the employer-based TDM strategies described above would be limited. However, given the average daytime population at Canada College, the establishment of a trip reduction program or the expansion of existing TDM measures could feasibly reduce VMT resulting from the Proposed Project. Therefore, Mitigation Measure TRANS-1, requiring trip reduction measures for residents of the new housing at Canada College is required.

The CAPCOA Handbook notes that TDM measures in suburban settings such as Woodside are generally expected to result in net VMT reduction of 10 percent or less, and accordingly, the C/CAG-VTA travel demand model estimates a maximum VMT reduction of approximately 10 percent for developments in Woodside if Mitigation Measure TRANS-1 is implemented. Table 3.7-3 displays Project-generated VMT with mitigations. As shown, Mitigation Measure TRANS-1 would reduce Project-generated home-based VMT per resident from 24.8 to 24.1, which remains above the threshold of significance (22.1).

Table 3.7-3: Project Generated VMT, with Mitigations

Scenario	Description	Home-Based VMT Per Resident	Change from Town Average	Below Threshold of Significance?
Existing (2020)	Town Average Baseline VMT	26.0	-	-
Threshold of Significance	15% Below Town Average VMT	22.1	-15.0%	-
Cumulative (2031)	Project Generated VMT (Unmitigated)	24.8	-4.6%	No
	Project Generated VMT (With Mitigations)	24.1	-7.3%	No

Notes: All VMT figures reflect home-based VMT per resident. Adopted threshold of significance is equivalent to 15% below Town average.

Source: C/CAG-VTA Travel Model, Parisi Transportation Consulting, 2023.

Consequently, overall, while implementation of the Proposed Project and Mitigation Measure TRANS-1 would result in a 7.3 percent reduction in per capita home-based VMT in 2031, there are no feasible mitigation measures available to further reduce VMT and achieve a 15 percent reduction over existing Townwide VMT. As such, Proposed Project VMT would remain significant and unavoidable. This significant and unavoidable program-level VMT impact does not preclude the finding of less-than-significant impact for future development projects that achieve VMT below the applicable thresholds of significance. Considering that the implementation of the Proposed Project could result in home-based VMT per capita lower than the townwide averages, and many proposed developments would meet VMT screening thresholds, it is expected that many future developments would achieve the applicable VMT thresholds of significance.

Mitigation Measures

MM-TRANS-1: Implement Trip Reduction Measures for Cañada College Housing Development. As a condition of project approval, the Town shall require the implementation of vehicle trip reduction measures for faculty and student housing at Canada College. These measures may be implemented as part of a trip reduction program specific to the housing development or through the expansion of existing trip reduction programs at the College. The College shall identify a range/menu of actions to incentivize alternatives to single occupant vehicle commute trips, such as:

- Unbundle parking costs (i.e. separate parking costs from property costs)
- Subsidize resident transit passes for use on SamTrans route 278
- Provide transit improvements, such as providing bus shelter or contributing land on the project site for bus stop along SamTrans route 278 (depending on project location within the campus)
- Provide on-site car share or vehicle fleet, bike share, or scooter share programs
- Provide secure bike storage facilities and/or a bike repair station on site
- Incorporate bicycle and pedestrian access to college facilities in site design, including connectivity to the existing free Cañada College shuttle stop
- Assign or hire a TDM Coordinator to provide education and marketing resources for residents and visitors

Significance After Mitigation: Significant and Unavoidable

3.8 Tribal Cultural Resources

This section describes the environmental and regulatory setting for tribal cultural resources. It also describes impacts related to historic, archaeological, and tribal cultural resources (including human remains) that would result from implementation of the Proposed Project and mitigation for significant impacts where feasible and appropriate. Cultural resources refer broadly to prehistoric and historic buildings, structures, objects, districts, and sites exhibiting important historical, cultural, scientific, or technological associations. This definition extends to tribal cultural resources which refer to sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe. For the purposes of CEQA, cultural resources are separated into three subcategories: historical resources, archaeological resources, and Native American tribal resources and remains. This section describes the historical setting of the Planning Area as well as the context for cultural resources in the Planning Area. Appendix C includes relevant background materials related to cultural resources and consultation.

There was one response to the Notice of Preparation (NOP) regarding topics covered in this section. The Native American Heritage Commission (NAHC) provided a brief summary of portions of Assembly Bill (AB) 52 and Senate Bill (SB) 18 as well as the NAHC's recommendations for conducting cultural resources assessments. In accordance with the NAHC's comment letter, a summary of AB 52 and SB 18 is included in the Regulatory Settings section of this chapter and the NAHC's recommendations for conducting cultural resources assessments are incorporated into the following analysis.

Environmental Setting

GEOLOGIC SETTING

The Town of Woodside sits at an elevation of approximately 350 to 550 feet above sea level.¹ The Town is located within the Coast Ranges Geomorphic Province of Northern California, a relatively geologically young and seismically active region on the western margin of the North American plate. The Coast Ranges are composed of thick Mesozoic and Cenozoic sedimentary strata. The northern Coast Ranges are dominated by irregular, knobby, landslide-topography of the Franciscan

¹ Geographic Names Information System. United States Geological Survey, United States Department of the Interior. Retrieved April 10, 2023. <https://edits.nationalmap.gov/apps/gaz-domestic/public/summary/1660202>

Complex. West of the San Andreas Fault is the Salinian Block, a granitic core extending from the southern extremity of the Coast Ranges to the north of the Farallon Islands.²

According to the Soil Survey of San Mateo County, California, the predominant soil type within the town limits is the Alambique-McGarvey Complex, which is a well-drained, gravelly loam soil normally found on mountain slopes (30 to 75 percent slopes). This soil comes from residuum weathered from sandstone.³

PRECONTACT SETTING

The precontact cultural chronology for the San Francisco Bay Area was developed through over a century of organized archaeological survey, beginning with N.C. Nelson in 1906 to the present. Since the 1950s, archaeological work in Santa Clara, Alameda, and Contra Costa Counties led to further refinement of the cultural sequence to consist of the Early Holocene (Lower Archaic), Early Period (Middle Archaic), Lower Middle Period (Initial Upper Archaic), Upper Middle Period (Late Upper Archaic), Initial Late Period (Lower Emergent), and Terminal Late Period (Protohistoric Ambiguities).

The Early Holocene (Lower Archaic, calibrated [cal] 8000–3500 B.C.) is characterized by a mobile forager pattern, with the milling slab, handstone, and a variety of large, wide-stemmed and leaf-shaped projectile points, largely composed of local Franciscan chert dominating the assemblage.⁴ During the Early Period (Middle Archaic, cal 3500–500 B.C.), several technological and social developments emerged, and new groundstone technology and the first cut shell beads in mortuaries signaled sedentism (living in one place for a period of time), regional symbolic integration, and increased regional trade in the San Francisco Bay Area.⁵ The Lower Middle Period (Initial Upper Archaic, cal 500 B.C.–cal A.D. 430) is marked by a “major disruption in symbolic integration systems,”⁶ and new bone tools appeared for the first time, including barbless fish spears, elk femur spatula, tubes, and whistles, as did coiled basketry manufacture.⁷ The Upper Middle Period (Late

² California Geological Survey. 2002. California Geomorphic Provinces. Available: <https://www.conservation.ca.gov/cgs/Documents/Publications/CGS-Notes/CGS-Note-36.pdf>. Accessed: April 4, 2023.

³ United States Department of Agriculture. 2019. Web Soil Survey. Available: <https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>. Accessed: April 10, 2023.

⁴ Hylkema, M. 2002. *Tidal Marsh, Oak Wood*. Accessed: *Cultural Florescence in the Southern San Francisco Bay Region*. Jon M. Erlandson and Terry L. Jones (eds.). Catalysts to Complexity: Late Holocene Societies of the California Coast, page 235. Perspectives in California Archaeology 6, J. E. Arnold, series editor. Institute of Archaeology, University of California, Los Angeles; Milliken, R., R. T. Fitzgerald, M. G. Hylkema, T. Origer, R. Groza, R. Wiberg, A. Leventhal, D. Bieling, A. Gottsfield, D. Gillette, V. Bellefemine, E. Strother, R. Cartier, and D. A. Fredrickson. 2007. *Punctuated Culture Change in the San Francisco Bay Area*. T. L. Jones and K. Klar (eds.), California Prehistory: Colonization, Culture, and Complexity, page 114. Walnut Creek, CA: Altamira Press.

⁵ Vellanoweth, R. L. 2001. AMS Radiocarbon Dating and Shell Bead Chronologies: Middle Holocene Trade and Interaction in Western North America. In *Journal of Archaeological Science* 28:941–950.

⁶ Milliken, R., et al. 2007. *Punctuated Culture Change in the San Francisco Bay Area*. In *California Prehistory: Colonization, Culture, and Complexity*, page 115. T. L. Jones and K. Klar (eds.). Altamira Press, Walnut Creek, CA.

⁷ Bennyhoff, J. 1986. The Emeryville Site, Viewed 93 Years Later, page 70. In *Symposium: A New Look at Some Old Sites*. G. S. Breschini and T. Haversat (eds.). Archives of California Prehistory 6. Coyote Press, Salinas, CA; Bieling, D. G. 1998. *Archaeological Investigations at CA-MRN-254, the Dominican College Site, San Rafael, Marin County, California*, page 218. Holman and Associates, San Francisco, CA. Submitted to Dominican College, San Rafael, and Davidon Homes, Walnut Creek, CA.

Upper Archaic, A.D. cal 430–1050) experienced the abandonment of many sites from the previous period, and single-barbed bone fish spears, ear spools, and large mortars were developed.⁸

Following the Archaic Period, the Initial Late Period (Lower Emergent, A.D. cal 1050–1550) is marked by a new increased level of sedentism, status ascription, and ceremonial integration in lowland central California.⁹ Evidence for increased social stratification throughout the San Francisco Bay Area after 1250 A.D. can be found in mortuary practices evidenced by the quality of burial items in high-status burials and cremations.¹⁰ The Terminal Late Period (Protohistoric Ambiguities) is exhibited by changes in artifact types and mortuary objects and toggle harpoons, hopper mortars, plain corner-notched arrow-sized projectile points, clamshell disk beads, magnesite tube beads, and secondary cremation in the North Bay.

ETHNOGRAPHIC SETTING

The Ohlone/Costanoan Indian people made their home in the Woodside area for thousands of years before the Spanish arrived in the mid-1700s. At the time of European contact, they spoke the Ramaytush language, which is a part of the Costanoan/Ohlone family. As documented in Mission records, the project area is located within the lands of the Olpen tribe, who held territory in the interior hills and valley lands of the Santa Cruz Mountains, the La Honda Creek portion of the San Gregorio watershed, and the Corte de la Madera Creek portion of the San Francisquito Creek watershed.¹¹ The Ohlone people in Woodside made their living by fishing, hunting, and gathering in the lush terrain of grassy meadows and forested hillsides of Woodside, supported by frequent discovery of burial sites and artifacts near creeks.¹²

Tribal Cultural Resources

A tribal cultural resource is a site, feature, place, cultural landscape, sacred place, or object with cultural value to a tribe that is included or determined to be eligible for inclusion in the California Register of Historical Resources (CRHR), included in a local register of historical resources, or otherwise determined to be significant by the lead agency of an environmental review process.

Potential Resources

The 2022 NWIC records search indicates that the Town of Woodside contains 19 recorded Native American archaeological resources, including lithic scatters, habitation sites, burials, quarry, bedrock mortars, petroglyphs, hearths, pits, and rock shelters and caves. Native American resources in this part of San Mateo County have been found on ridges, midslope benches, in valleys, near intermittent and perennial watercourses and near areas populated by oak, buckeye, manzanita, and pine, as well

⁸ Milliken, R., et al. 2007. Punctuated Culture Change in the San Francisco Bay Area, page 116. In *California Prehistory: Colonization, Culture, and Complexity*. T. L. Jones and K. Klar (eds.). Altamira Press, Walnut Creek, CA.

⁹ Fredrickson, D. A. 1973. *Early Cultures of the North Coast Ranges, California*. Ph.D. dissertation. Department of Anthropology, University of California, Davis.

¹⁰ Fredrickson, D. 1984. The North Coastal Region. In *California Archaeology*, pages 471–528. M. Moratto (ed.). Academic Press, Orlando, FL.

¹¹ Milliken, R. 1995. *A Time of Little Choice: The Disintegration of Tribal Culture in the San Francisco Bay Area 1769–1910*, page 249. Ballena Press Anthropological Paper No. 43. Menlo Park, CA.

¹² Woodside General Plan 2012.

https://www.woodsidetown.org/sites/default/files/fileattachments/planning/page/3921/1_introduction_5.pdf

as near a variety of plant and animal resources. The Town of Woodside Housing Element Update Planning Area is located in San Mateo County and includes a portion of Santa Cruz Mountains, Kings Mountain, San Andreas Rift Zone, Jasper Ridge, and several creeks including, La Honda Creek, West Union Creek, McGarvey Gulch, Martin Creek, Alambique Creek, Corte De Madera Creek, Searsville Lake, Schilling Lake, Bear Creek, San Francisquito Creek, and several springs. Aerial maps indicate a heavily wooded and densely chaparral western half with a few roads, buildings, and structures. The eastern half, although still fairly wooded, is more densely populated by buildings structures and includes large areas of low grasses or bare ground. Given the similarity of these environmental factors and the ethnographic and archaeological sensitivity of the Planning Area, NWIC has determined that there is a high potential for unrecorded Native American resources to be within the town limits.

Native American Consultation

In accordance with the requirements of Public Resources Code 21080.3.1, the Town contacted the Native American Heritage Commission (NAHC) on October 31, 2022, with a request to facilitate involvement of interested Native American tribes in the planning process and a search of the Sacred Lands File for sites within the Planning Area. The NAHC responded on December 1, 2022, with a letter that indicated the results of the search of the Sacred Lands File were positive. On November 4, 2022, the Town sent tribal outreach letters to the nine Native American representatives from seven tribes that were identified by the NAHC to consult on the Proposed Project. The Town sent out additional letters to two tribes on March 22, 2023, to consult on the Proposed Project. The Town has not received any responses as of February 2024.

Details of the recorded tribal cultural resources and tribal communication are included in Appendix C.

Regulatory Setting

Federal Regulations

National Native American Graves Protection and Repatriation Act

The Native American Graves Protection and Repatriation Act (NAGPRA) was passed in 1990 to provide for the protection of Native American graves. The act conveys to Native American's of demonstrated lineal descent, the human remains, including the funerary or religious items, that are held by federal agencies and federally supported museums, or that have been recovered from federal lands. NAGPRA makes the sale or purchase of Native American remains illegal, whether or not they were derived from federal or Native American lands.

State Regulations

California Environmental Quality Act

CEQA, as codified in PRC Section 21000 et seq. and implemented through the CEQA Guidelines (14 California Code of Regulations [CCR] Section 15000 et seq.), is the principal statute governing the environmental review of projects in the state. In order to be considered a historical resource, it generally must be at least 50 years old. Section 21084.1 of CEQA and Section 15064.5 of the CEQA Guidelines define a historical resource for purposes of CEQA. A historical resource includes:

- A resource listed in, or determined to be eligible by the State Historical Resources Commission for listing in, the CRHR (PRC Section 5024.1, Title 14 CCR, Section 4850 et seq.);
- A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the PRC or identified as significant in a historical resource survey meeting the requirements of Section 5024.1(g) of the PRC, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant;
- Any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing in the CRHR (PRC Section 5024.1, Title 14 CCR, Section 4852).

The fact that a resource is not listed in, or determined to be eligible for listing in, the CRHR; not included in a local register of historical resources, pursuant to PRC Section 5020.1(k); or not identified in a historical resources survey meeting the criteria of PRC Section 5024.1(g) does not preclude a lead agency from determining that the resource may be a historical resource, as defined in PRC Sections 5020.1(j) or 5024.1.

California Register of Historical Resources

The CRHR is "an authoritative listing and guide to be used by state and local agencies, private groups, and citizens in identifying the existing historical resources of the state and indicating which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change" (PRC Section 5024.1(a)). Certain resources are determined by CEQA to be automatically included in the CRHR, including California properties formally eligible for or listed in the NRHP. To be eligible for the CRHR as a historical resource, a resource must be significant at the local, state, and/or federal level under one or more of the following evaluative criteria, as defined in PRC Section 5024.1(c):

1. The resource is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
2. The resource is associated with the lives of persons important in our past.
3. The resource embodies the distinctive characteristics of a type, period, region, or method of construction; represents the work of an important creative individual; or possesses high artistic values.
4. The resource has yielded, or may be likely to yield, information important in prehistory or history.

As with the NRHP, a significant historical resource must possess integrity in addition to meeting the significance criteria to be considered eligible for listing in the CRHR. Consideration of integrity for evaluation of CRHR eligibility follows the definitions and criteria from the National Park Service's *National Register Bulletin 15*.

California Historic Resources

OHP (Office of Historic Preservation) offers four different registration programs, including the California Historical Landmarks, California Points of Historical Interest, CRHR, and the NRHP. Each registration program is unique in the benefits offered and procedures required. If a resource meets the criteria for registration, it may be nominated by any individual, group, or local government to any program at any time. Resources do not need to be locally designated before being nominated to a state program nor do they need to be registered at the state level before being nominated to the National Register. The California Register includes buildings, the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California. Resources on the California Register have met criteria for designation or have been included due to their presence on the NRHP, the State Historical Landmark program, or the California Points of Historical Interest program.

California Points of Historical Interest

California Points of Historical Interest are sites, buildings, features, or events of local (city or county) significance, having anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other value. Criteria are the same as those for Historical Landmarks but directed to local areas. Points of Historical Interest designated after December 1997 and recommended by the State Historical Resources Commission are also listed in the California Register. No historical resource may be designated as both a Landmark and a Point; if a Point is subsequently granted status as a Landmark, the Point designation will be retired.

California Government Code Section 65040.2(g)

California Government Code Section 65040.2(g) provides guidelines for consulting with Native American tribes for the following: (1) the preservation of, or the mitigation of impacts on places, features, and objects described in Sections 5097.9 and 5097.993 of the PRC; (2) procedures for identifying through NAHC the appropriate California Native American tribes; (3) procedures for continuing to protect the confidentiality of information concerning the specific identity, location, character, and use of those places, features, and objects; and (4) procedures to facilitate voluntary landowner participation to preserve and protect the specific identity, location, character, and use of those places, features, and objects.

Senate Bill 18

Signed into law in September 2004, and effective March 1, 2005, SB 18 permits California Native American tribes recognized by the NAHC to hold conservation easements on terms mutually satisfactory to the tribe and the landowner. The term "California Native American tribe" is defined as "a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC." The bill also requires that, prior to the adoption or amendment of a city or county's general plan, the city or county consult with California Native American tribes for the purpose of preserving specified places, features, and objects located within the city or county's jurisdiction. SB 18 also applies to the adoption or amendment of

specific plans. This bill requires the planning agency to refer to the California Native American tribes specified by the NAHC and to provide them with opportunities for involvement.

In accordance with SB 18 and AB 52, the Town contacted the NAHC in October 2022 to request a consultation list of tribes traditionally and culturally affiliated with the Planning Area. Upon receipt of a list of tribal contacts, the Town contacted tribal representatives in December 2022, providing information about the planning process and inviting them to initiate consultation if desired. The Town has not received any responses as of April 2024. Correspondence with the NAHC and tribal contacts is included in Appendix C.

Assembly Bill 52

Tribal cultural resources were originally identified as a distinct CEQA environmental category with the adoption of AB 52 in September 2014. For all projects subject to CEQA that received a notice of preparation, notice of negative declaration, or mitigated negative declaration on or after July 1, 2015, AB 52 requires the lead agency on a proposed project to consult with the geographically affiliated California Native American tribes. The legislation creates a broad new category of environmental resources, “tribal cultural resources,” which must be considered under CEQA. AB 52 requires a lead agency to not only consider the resource’s scientific and historical value but also whether it is culturally important to a California Native American tribe.

AB 52 defines tribal cultural resources as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are included or determined to be eligible for inclusion in the CRHR; included in a local register of historical resources, as defined in PRC Section 5020.1(k); or determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to the criteria of PRC Section 5024.1(c) (CEQA Section 21074).

AB 52 also sets up an expanded consultation process. For projects initiated after July 1, 2015, lead agencies are required to provide notice of the proposed projects to any tribe that is traditionally and culturally affiliated with the geographic area that requested to be informed by the lead agency, following PRC Section 21018.3.1(b). If, within 30 days, a tribe requests consultation, the consultation process must begin before the lead agency can release a draft environmental document. Consultation with the tribe may include discussion of the type of review necessary, the significance of tribal cultural resources, the significance of the project’s impacts on the tribal cultural resources, and alternatives and mitigation measures recommended by the tribe. The consultation process will be deemed concluded when either (1) the parties agree to mitigation measures or (2) any party concludes, after a good-faith effort, that an agreement cannot be reached. Any mitigation measures agreed to by the tribe and lead agency must be recommended for inclusion in the environmental document. If a tribe does not request consultation, or to otherwise assist in identifying mitigation measures during the consultation process, a lead agency may still consider mitigation measures if the agency determines that a project will cause a substantial adverse change to a tribal cultural resource.

In accordance with SB 18 and AB 52, the Town contacted the NAHC in October 2022 to request a consultation list of tribes traditionally and culturally affiliated with the Planning Area. Upon receipt of a list of tribal contacts, the Town contacted tribal representatives in December 2022, providing information about the planning process and inviting them to initiate consultation under AB 52 if

desired. The Town has not received any responses as of April 2024. Correspondence with the NAHC and tribal contacts is included in Appendix C.

Assembly Bill 168

AB 168, adopted in September 2020, provides additional protection for tribal cultural resources as defined in AB 52. This bill applies in situations where a developer seeks to streamline approval under SB 35 and, in doing so, bypass CEQA requirements. AB 168 rectifies a loophole in SB 35 that allowed developers to apply for fast-tracked approval without notifying Native American tribes affiliated with the project area. Instead, under AB 168 projects would be ineligible for SB 35 and subject to CEQA if (1) the site of the proposed development is a tribal cultural resource that is on a national, state, Tribal, or local historic register list, (2) the local government and the California Native American tribe do not agree that no potential tribal cultural resource would be affected by the proposed development, or (3) the local government and California Native American tribe find that a potential tribal cultural resource could be affected by the proposed development and the parties do not document an enforceable agreement regarding the methods, measures, and conditions for treatment of those tribal cultural resources, as provided.

California Public Resources Code

Section 5097.98

The treatment of Native American human remains is regulated by PRC Section 5097.98, as amended by Assembly Bill 2641, which addresses the disposition of Native American burials, protects remains, and appoints the NAHC to resolve disputes. In addition, California Health and Safety Code Section 7050.5 includes specific provisions for the protection of human remains in the event of discovery, and Section 7052 makes the willful mutilation, disinterment, or removal of human remains a felony. The Health and Safety Code is applicable to any project where ground disturbance would occur.

Sections 5097–5097.6

Sections 5097–5097.6 of the California PRC outline the requirements for cultural resource analysis prior to the commencement of any construction project on state lands. The state agency proposing the project may conduct the cultural resource analysis or they may contract with the State Department of Parks and Recreation. In addition, this section stipulates that the unauthorized disturbance or removal of archaeological, historical, or paleontological resources located on public lands is a misdemeanor. It prohibits the knowing destruction of objects of antiquity without a permit (expressed permission) on public lands and provides for criminal sanctions. This section was amended in 1987 to require consultation with the California NAHC whenever Native American graves are found. Violations for the taking or possessing remains or artifacts are felonies.

Sections 5097.9-991

PRC Section 5097.9-991, regarding Native American heritage, outlines protections for Native American religion from public agencies and private parties using or occupying public property. Also protected by this code are Native American sanctified cemeteries, places of worship, religious or ceremonial sites, or sacred shrines located on public property.

Local Regulations

Town of Woodside General Plan 2012 (General Plan)

The Town of Woodside General Plan 2012 (General Plan) includes the following goals and policies associated with tribal cultural resources:

Goal HP1: Protect historically and archaeologically significant structures, sites, and artifacts.

Policy 1.B: Local Regulation. Amend the Zoning Code to include a historic and archaeological resource preservation ordinance consistent with State law.

Policy 1.C: Protection of Archaeological Resources. Require work to temporarily halt if archeological resources are encountered during construction and project personnel should not collect cultural resources, including Native American resources and historic-period resources.

Town of Woodside Municipal Code (Town Code)

Chapter 152.119 of the Town's Municipal Code (Town Code) states the Planning Commission may require the dedication of open space, conservation, or scenic easements within a proposed land division or subdivision for the express purpose of protecting the natural vegetation, terrain, watercourses, historic and cultural resources, scenic vistas, and wildlife and for the purpose of preventing or limiting drainage, erosion, and water quality problems and geologic hazards.

Impact Analysis

SIGNIFICANCE CRITERIA

For the purposes of this EIR, a significant impact would occur if the Proposed Project would:

Criterion 1: Cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 21074 as either a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native 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 PRC 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 PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

IMPACTS

Impact 3.8-1 Implementation of the Proposed Project would not cause an adverse change in the significance of a tribal cultural resource,

defined in PRC Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:

- (a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1(k), or**
- (b) 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 PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. (*Less than Significant with Mitigation Incorporated*)**

Future development or redevelopment projects allowed under the Proposed Project could result in indirect impacts through grading, overland construction vehicle travel, or other ground-disturbing activities, or through facilitation of public access to culturally significant sites. The impact of such activities would be considered significant if they were to cause a substantial adverse change to identified historical resources. A records search was conducted, and it was determined that no known historical resources exist on any of the opportunity sites identified in the Proposed Project. Historical resources previously identified in the Town are identified on Map HP1 of the General Plan. Impacts would be less than significant.

In addition, implementation of the Proposed Project would not directly result in physical construction that could impact recorded tribal cultural resources. Implementation of the Proposed Project would primarily involve facilitation of smaller scale infill development in established residential neighborhoods, with some additional multi-family housing to provide varied housing types. Smaller-scale development includes vacant and underutilized single-family residences and development of accessory dwelling units (ADUs). Candidate housing sites have been screened to confirm they do not contain known historic or tribal cultural resources based on information available to the Town. Further, all development under the Proposed Project would be required to comply with existing regulations, including CEQA Guidelines Section 15064.5, Health and Safety Code Section 7050.5, and Public Resources Code Section 5097.94, Section 5097.98, and Section 21083.2 which stipulate protocols that must be followed in the event of discovery of archaeological resources, tribal cultural resources, and human remains. These regulations, in addition to the mitigation measure identified below, would ensure that impacts to tribal cultural resources would be less than significant.

According to the Northwest Information Center (NWIC), there is a high potential for unrecorded Native American resources to be within the town limits, especially in the vicinity of La Honda Creek, West Union Creek, McGarvey Gulch, Martin Creek, Alambique Creek, Corte De Madera Creek, Searsville Lake, Schilling Lake, Bear Creek, San Francisquito Creek, and springs. Specifically, the Town of Woodside Proposed Project Planning Area contains 19 recorded Native American archaeological resources, including lithic scatters, habitation sites, burials, quarry, bedrock mortars, petroglyphs, hearths, pits, and rock shelters and caves. In addition, the Planning Area contains 27

historic-period archaeological resources, including isolates, orchards or groves, trash scatters, a cabin site, an abandoned dirt road, concrete slab and spigot, graves or cemetery, a Mill, a water tower, farmhouse earth dam, and roman pool.

As previously discussed, the response from the NAHC stated that a search of the Sacred Lands File to identify sacred lands in the Planning Area was positive. While the exact location of these resources is not public information, consultation with the tribes per SB 18 and AB 52 provides the opportunity for Native American tribes to identify if known resources could be compromised by implementation of the Proposed Project. Such consultation is also intended to arrive at consensus regarding mitigation measures or ways to avoid a significant effect on tribal cultural resources. No responses or formal request for tribal consultation have been received by the Town as noted in Regulatory Setting.

In addition to consultation with tribes required by State law, and in accordance with PRC Section 21083.2 and CEQA Guidelines Section 15064.5(f), which recognize that historical or unique archaeological resources may be accidentally discovered during project construction, the Town may make provisions for archaeological sites accidentally discovered during construction. These provisions may include an immediate evaluation of the find. If the find is determined to be a unique archaeological resource, contingency funding and a time allotment sufficient to allow recovering an archaeological sample or to employ one of the avoidance or mitigation measures may be required under the provisions set forth Section 21083.2. In addition, **Mitigation Measure CUL-1** requires developers proposing to construct in areas of high sensitivity for cultural and tribal cultural resources to conduct cultural resource awareness training prior to project-related ground disturbance for developments that have a high potential to uncover archaeological or tribal cultural resources.

At the program level, the impact of implementation of the Proposed Project on tribal cultural resources would therefore be less than significant with implementation of existing State regulations as well as mitigation actions within the Proposed Project.

Mitigation Measures

MM-CUL-3: Conduct Cultural Resources Awareness Training. Prior to the start of any ground disturbance or construction activities, developers of projects within 50 feet of a creek or within 50 feet of recorded archaeological resources or tribal cultural resources in the Planning Area shall retain a qualified professional archaeologist to conduct cultural resource awareness training for construction personnel. This training shall include an overview of what cultural resources are and why they are important, archaeological terms (such as site, feature, deposit), project site history, types of cultural resources likely to be uncovered during excavation, laws that protect cultural resources, and the unanticipated discovery protocol per PRC Section 21083.

Significance After Mitigation: Less than significant

3.9 Utilities and Service Systems

This section assesses potential environmental impacts from future development under the Proposed Project as related to public utilities, including water, wastewater, and stormwater systems, and solid waste services. This section describes existing water, wastewater, stormwater, and solid waste infrastructure and services in the Planning Area, as well as relevant federal, State, and local regulations and programs.

There were six Notice of Preparation (NOP) responses which included concerns about utilities associated with Proposed Project implementation, primarily centered on construction near an existing pipeline as well as the ability of service providers to provide additional utility capacity for new development more generally. These comments are addressed in the following Impact Analysis.

Environmental Setting

PHYSICAL SETTING

Water System

California Water Service (Cal Water) Bear Gulch District supplies most of the water supply to the Town of Woodside, while the Emerald Lake Hills area of Woodside is served by Redwood City, who purchases their water from the Hetch Hetchy Regional Water System, as displayed on Figure 3.9-1. The Bear Gulch District receives 85 to 95 percent of its daily supply from the San Francisco Regional Water System, with the balance supplied by surface water runoff from California Water Service Company's own watershed.¹ Surface water runoff is collected and treated at Bear Gulch Water Treatment Plant in Atherton prior to addition to the distribution system, which has a capacity of 6 MGD.²

Electricity, Natural Gas, and Telecommunications

Peninsula Clean Energy (PCE) provides electricity from clean energy sources, while Pacific Gas and Electricity (PG&E) owns the power lines and delivers the power generated by PCE. There are numerous telecommunication providers in the city for DSL, wireless, cable, and fiber optic services. Approximately eleven internet service providers in the city offer residential services and eight offer business services. Service providers such as XFINITY, AT&T Fiber, Viasat, EarthLink, and Hughes

¹ Bay Area Water Supply and Conservation Agency, 2024. California Water Service - Bear Gulch District. Available: https://bawasca.org/members/profiles/cws_bear_gulch. Accessed: February 15, 2024.

² California Water Service, 2024. Bear Gulch 2020 Water Quality Report. Available: <https://www.calwater.com/ccrs/bg-bg-2020/>. Accessed: March 5, 2024.

Net, among many others, provide telecommunication services to residents and businesses in the town.³

Garbage, Recycling, and Organics Collection Service

GreenWaste Recovery holds the franchise for providing solid waste management services in Woodside, including the collection of refuse, recyclables, unlimited yard waste, and some household hazardous waste such as batteries and compact fluorescent lights. GreenWaste vehicles deliver all material collected in Woodside to the GreenWaste Materials Recovery Facility (MRF) in San Jose for processing.

Stormwater

The storm drain system in Woodside consists primarily of open ditches, and some culverts which flow through private properties and public rights-of-way with limited sections of concrete-lined channels and pipes. The Town maintains drainage systems located within the public rights-of-way. The Town of Woodside reviews drainage and erosion control plans as part of a site development and/or building permit to ensure the latest Non Point Discharge Elimination System (NPDES) requirements are reflected and implemented as part of the permitted work.

Wastewater

The Town of Woodside has historically utilized private on-site septic systems for managing waste disposal, which reflects the Town's rural nature and lack of widespread access to public sewer disposal. About a third of the parcels in Town are served by sewer, as displayed on Figure 3.9-2. Two public sanitary sewer districts, the County of San Mateo Fair Oaks District, and Woodside's Town Center Sewer District, serve 550 and 180 existing connections throughout Woodside, respectively. The Fair Oaks Sewer District includes the Redwood Creek Trunk Assessment Area and the Glen Sewer Collection System Area. The contractual capacity for the Fair Oaks District within Woodside is 150,000 gallons per day, while the contractual capacity for the Town Center Sewer District is 100,000 gallons per day.

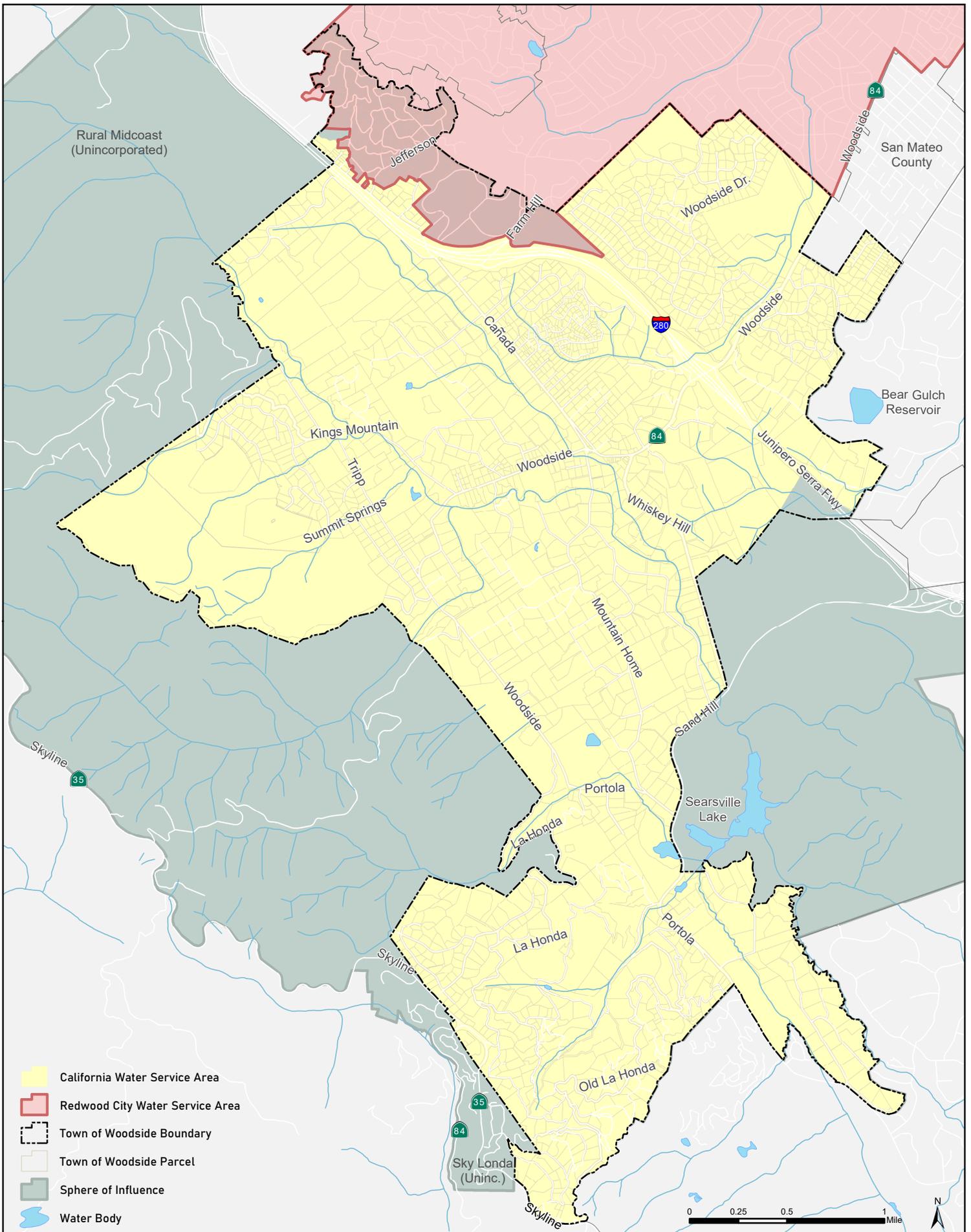
Wastewater from the Fair Oaks and Town Center public sanitary sewer districts is treated at the Silicon Valley Clean Water (SVCW) Wastewater Treatment Plant (WWTP). The wastewater at the SVCW WWTP undergoes primary, secondary (activated sludge), dual media filtration, disinfection, and dechlorination treatment before being discharged to a deep-water outfall in the San Francisco Bay. The SVCW WWTP has a capacity to treat 29.5 million gallons per day (MGD), but currently receives approximately 20.0 MGD from customers in the SVCW service area.⁴

³ BroadBandNow. 2023. Internet Providers in Redwood City, California. Available:

<https://broadbandnow.com/California/Redwood-City?zip=94062>. Accessed: April 10, 2024.

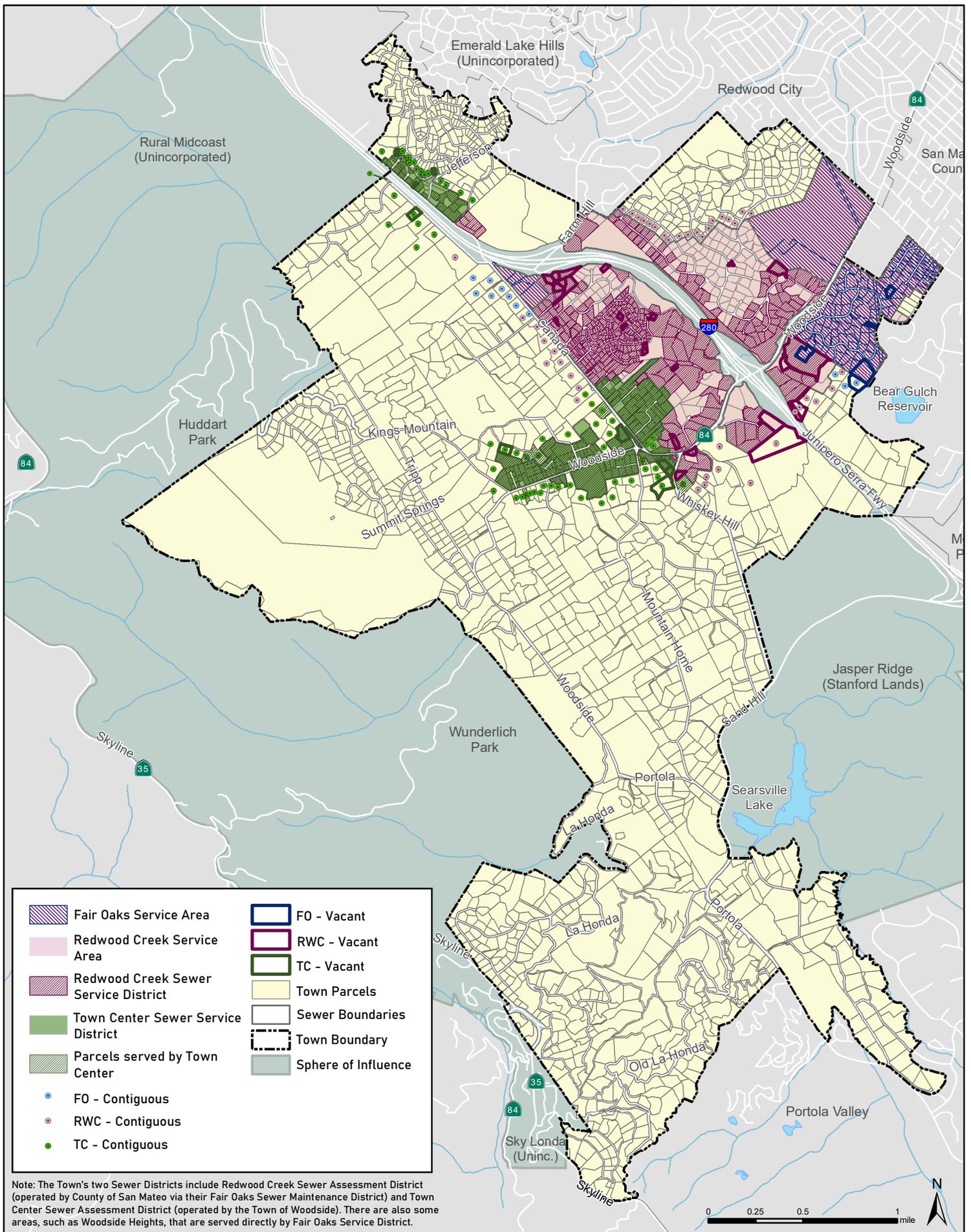
⁴ California Water Service (Cal Water), 2021. 2020 Urban Water Management Plan – Bear Gulch District. Available:

https://www.calwater.com/docs/uwmp2020/BG_2020_UWMP_FINAL.pdf. Accessed: February 14, 2024.



3.9-1 Water Service Areas

Town of Woodside



3.9-2 Town Sewer Areas and Districts

Town of Woodside

REGULATORY SETTING

Federal

Federal Safe Drinking Water Act

The Safe Drinking Water Act (SDWA), administered by the U.S. Environmental Protection Agency (EPA) in coordination with the states, is the main federal law that ensures the quality of drinking water. Under the SDWA, the U.S. EPA sets standards for drinking water quality and oversees the states, localities, and water suppliers who implement those standards. The Department of Public Health administers the regulations contained in the SDWA in the State of California.

United States Environmental Protection Agency

The 1986 amendments to the Safe Drinking Water Act and the 1987 amendments to the Clean Water Act (CWA) established the EPA as the primary authority for water programs. The EPA is the federal agency responsible for providing clean and safe surface water, groundwater, and drinking water, and protecting and restoring aquatic ecosystems. The Planning Area is in EPA Region 9 (Pacific Southwest), which includes Arizona, California, Hawaii, Nevada, Pacific Islands, and Tribal Nations.

Federal Water Pollution Control Act of 1972 (Clean Water Act)

The CWA establishes the basic structure for regulating discharges of pollutants into "waters of the United States." The CWA specifies a variety of regulatory and non-regulatory tools to sharply reduce direct pollutant discharges into waterways, finance municipal wastewater treatment facilities, and manage polluted runoff. Some of these tools include Total Maximum Daily Loads (TMDLs), water quality certification, and regulations on discharge of dredge or fill material.

National Pollutant Discharge Elimination System

The CWA was amended in 1987 to include urban and stormwater runoff, which required many cities to obtain a National Pollution Discharge Elimination System (NPDES) permit for stormwater conveyance system discharges. Section 402(p) of the CWA prohibits discharges of pollutants contained in stormwater runoff, except in compliance with a NPDES permit.

State

California Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act established the State Water Resources Control Board (SWRCB) and nine regional water quality control boards to address water quality and rights regulation. The five-member SWRCB protects water quality by setting statewide policy, coordinating and supporting the Regional Water Quality Control Board (RWQCB) efforts, and reviewing petitions that contest RWQCB actions. The SWRCB is also solely responsible for allocating surface water rights. Each RWQCB makes critical water quality decisions for its region, including setting standards, issuing waste discharge requirements, determining compliance with those requirements, and taking appropriate enforcement actions. The Planning Area lies within the jurisdiction of the San Francisco RWQCB.

The Act authorizes the SWRCB to enact state policies regarding water quality in accordance with CWA Section 303. In addition, the Act authorizes the SWRCB to issue waste discharge

requirements (WDRs) for projects that would discharge to State waters. SWRCB Order No. 2006-0003 provides a consistent statewide approach to reducing sanitary sewer overflows (SSOs) by requiring public sewer system operators to take all feasible steps to control the volume of waste discharged into the system, to prevent sanitary sewer waste from entering the storm sewer system, and to develop a sewer system management plan.

The Porter-Cologne Water Quality Control Act further requires the SWRCB or the RWQCBs to adopt water quality control plans (basin plans) for the protection of water quality. Basin plans also provide the technical basis for determining waste discharge requirements, taking enforcement actions, and evaluating clean water grant proposals.

The SWRCB also manages the Division of Drinking Water (DDW), which regulates public water supply systems. Regulatory responsibilities include the enforcement of the federal and State Safe Drinking Water Acts, the regulatory oversight of public water systems, issuance of water treatment permits, and certification of drinking water treatment and distribution operators. State regulations for potable water are contained primarily within the Food and Agricultural Code, the Government Code, the Health and Safety Code, the Public Resources Code, and the Water Code. Regulations are from Title 17 and Title 22 of the California Code of Regulations.

Recycled water programs are also regulated by the SWRCB. The regulations governing recycled water are found in a combination of sources including the Health and Safety Code, Water Code, and Titles 22 and 17 of the California Code of Regulations. Issues related to treatment and distribution of recycled water are generally under the influence of the SWRCB.

California Department of Water Resources

DWR is also responsible for overseeing the statewide process of developing and updating the California Water Plan (Bulletin 160 series); protecting and restoring the Sacramento–San Joaquin Delta; regulating dams, providing flood protection, and assisting in emergency management; educating the public about the importance of water and its proper use; and providing technical assistance to service local water needs.

Senate Bills 610 and 221

Enacted in 2002, SB 610, which was codified in the State Water Code beginning with section 10910, requires the preparation of a water supply assessment (WSA) for projects within cities and counties that propose to construct 500 or more residential units or the equivalent. SB 610 stipulates that when environmental review of certain large development projects is required, the water agency that is to serve the development must complete a WSA to evaluate water supplies that are or will be available during normal, single-dry, and multiple-dry years during a 20-year projection to meet existing and planned future demands, including the demand associated with a proposed project.

Enacted in 2001, SB 221, which was codified in the State Water Code beginning with section 10910, requires that the legislative body of a city or county, which is empowered to approve, disapprove, or conditionally approve a subdivision map, must condition such approval upon proof of sufficient water supply. The term "sufficient water supply" is defined in SB 221 as the total water supplies available during normal, single-dry, and multiple-dry years within a 20-year projection that would meet the projected demand associated with the proposed subdivision. The definition of sufficient

water supply also includes the requirement that sufficient water encompass not only the proposed subdivision, but also existing and planned future uses, including agricultural and industrial uses.

The Water Conservation Act of 2009 (SB X7-7)

California legislation enacted in 2009 as SB 7 of the 7th Special Legislative Session (SB X7-7) instituted a new set of urban water conservation requirements known as "20 Percent By 2020." These requirements stipulate that urban water agencies reduce per-capita water use within their service areas by 20 percent relative to their use over the previous 10 to 15 years.

Green Building Code and Title 24 Updates

The California Green Building Standards Code (CALGreen) (proposed Part 11, Title 24) was adopted as part of the California Building Standards Code (24 California Code of Regulations). Part 11 established voluntary standards that became mandatory under the 2010 edition of the code. These involved sustainable site development, energy efficiency (in excess of California Energy Code requirements), water conservation, material conservation, and internal air contaminants. The current energy efficiency standards were adopted in 2022 and took effect on January 1, 2023.

State Updated Model Water Efficient Landscape Ordinance (Assembly Bill 1881 (2006))

The State Legislature adopted the Water Conservation in Landscaping Act of 2006 (AB 1881) requiring the Department of Water Resources to update the State Model Water Efficient Landscape Ordinance (MWELo). All local land use agencies were required to adopt the MWELo, or develop an ordinance that is at least as effective by January 1, 2010. The State updated MWELo again in 2015, increasing efficiency standards from the previous version. In so doing, the State required cities and counties to update their ordinances to reflect the change in law.

California Urban Water Management Planning Act

The California Legislature enacted the Urban Water Management Planning Act of 1983 (California Water Code Sections 10610 through 10656) to support conservation and efficient use of urban water supplies at the local level. The act requires every urban water supplier that provides water to 3,000 or more customers, or over 3,000 acre feet (AF) of water annually, to make every effort to ensure the appropriate level of reliability in its water service to meet the needs of its customers during normal, dry, and multiple-dry years. The act requires that total projected water use be compared to water supply sources over the next 20 years in five-year increments, that planning occur for single- and multiple-dry water years, and that plans include a water recycling analysis that incorporates a description of the wastewater collection and treatment system within the agency's service area along with current and potential recycled water uses.

Applicable urban water suppliers within California are required by the Water Code to prepare and adopt a UWMP and update it every five years. A UWMP is required in order for a water supplier to be eligible for the DWR-administered state grants, loans, and drought assistance. A UWMP provides information on water use, water resources, recycled water, water quality, reliability planning, demand management measures, best management practices (BMPs), and water shortage contingency planning for a specified service area or territory.

California Emergency Graywater Regulations

In 2009, as part of the Governor's declared State of Emergency, Chapter 16A "Nonpotable Water Reuse Systems" was incorporated into the 2007 California Plumbing Code. Chapter 16A establishes

minimum requirements for the installation of graywater systems in residential occupancies regulated by the California Department of Housing and Community Development, providing guidance and flexibility designed to encourage the use of graywater. The standards allow small graywater systems to be installed in homes without a construction permit, substantially reducing the barriers to installing small residential graywater systems in California. The purpose of the regulations is to conserve water by facilitating greater reuse of laundry, shower, sink, and similar sources of discharge for irrigation and/or indoor use; to reduce the number of noncompliant graywater systems by making legal compliance easily achievable; to provide guidance for avoiding potentially unhealthful conditions; and to provide an alternative way to relieve stress on private sewage disposal systems.

Assembly Bill (AB) 1668 and Senate Bill (SB) 606

Passed in 2018, AB 1668 and SB 606 establish guidelines for efficient water use and a framework for the implementation and oversight of the new standards, which must be in place by 2022. The two bills strengthen the state's water resiliency in the face of future droughts with provisions that include:

- Establishing water use objectives and long-term standards for efficient water use that apply to urban retail water suppliers; comprised of indoor residential water use, outdoor residential water use, commercial, industrial and institutional (CII) irrigation with dedicated meters, water loss, and other unique local uses.
- Providing incentives for water suppliers to recycle water.
- Identifying small water suppliers and rural communities that may be at risk of drought and water shortage vulnerability and providing recommendations for drought planning.
- Requiring both urban and agricultural water suppliers to set annual water budgets and prepare for drought.

According to the fact sheet⁵, each urban water supplier, starting in January 1, 2024, will calculate its own objective based on the water needed in its service area for efficient indoor residential water use, outdoor residential water use, commercial, industrial and institutional (CII) irrigation with dedicated meters and reasonable amounts of system water loss from leaks. In determining their objectives, water suppliers will also consider other unique local uses and credits for potable water reuse, based on standards adopted by the state water board.

California's Department of Resources Recycling and Recovery

California Department of Resources Recycling and Recovery (CalRecycle) is the State's leading authority on recycling, waste reduction, and product reuse. CalRecycle plays an important role in the stewardship of California's vast resources and promotes innovation in technology to encourage economic and environmental sustainability. CalRecycle brings together the State's recycling and waste management programs and continues a tradition of environmental stewardship. Mandated

⁵ California State Water Resourced Control Board, 2020. Water Efficiency Legislation will Make California More Resilient to Impacts of Future Droughts. Available:

https://www.waterboards.ca.gov/publications_forms/publications/factsheets/docs/6.7.18_water_efficiency_bill_fact_sheet_FNL_updated_5.21.20.pdf. Accessed: April 10, 2024.

responsibilities of CalRecycle are to reduce waste, promote the management of all materials to their highest and best use, and protect public health and safety and the environment.

California Integrated Waste Management Act (AB 939)

Assembly Bill 939, California's Integrated Waste Management Act of 1989, mandates that 50 percent of solid waste be diverted by the year 2000 through source reduction, recycling, and composting. AB 939 also establishes a goal for all California counties to provide at least 15 years of ongoing landfill capacity. This requires each region to prepare a source reduction and recycling element to be submitted to CalRecycle, which administers programs formerly managed by the state's Integrated Waste Management Board and Division of Recycling.

California Solid Waste Reuse and Recycling Access Act of 1991 (AB 1327)

AB 1327 was established in 1991, which required CalRecycle to develop a model ordinance for the adoption of recyclable materials in development projects. Local agencies were then required to adopt the model, or an ordinance of their own, governing adequate areas for collection and loading of recyclable materials in development projects.

Disposal Measurement System Act of 2008 (SB 1016)

SB 1016 maintains the 50 percent diversion rate requirement established by AB 939, while establishing revised calculations for those entities that did not meet the 50 percent diversion rate. SB 1016 also established a per capita disposal measurement system to make the process of goal measurement, as established by AB 939, simpler, timelier, and more accurate. The new disposal-based indicator—the per capita disposal rate—uses only two factors: a jurisdiction's population (or in some cases employment) and its disposal as reported by disposal facilities.

Solid Waste Diversion (AB 341)

Effective July 1, 2012, AB 341 established a policy goal for the State that no less than 75 percent of solid waste generated be source reduced, recycled, or composted by the year 2020. A Report to the Legislature accompanied the passage of AB 341 and outlined five strategies and three additional focus areas as potential pathways that can be pursued to achieve this goal. This report, as directed by the Legislature, provides strategies to achieve that 75 percent goal. Subsequent reports on the State of Recycling and Disposal were published in 2015, 2016, and 2017.

AB 341 also requires commercial enterprises that generate four cubic yards or more of solid waste weekly participate in recycling programs. This requirement includes multifamily housing complexes of five units or more, regardless of the amount of solid waste generated each week.

Assembly Bill 1826

Adopted in 2016, Assembly Bill 1826 (AB 1826) requires state agencies, businesses, and multifamily complexes that generate specific quantities of organic or solid waste each week enroll in organic recycling programs through an applicable solid waste disposal company. Organic recycling programs may take the form of composting, mulching, or anaerobic digestion. Businesses and multifamily residential housing complexes that generate the following quantities are required to implement organic or solid waste recycling programs under AB 1826:

- Eight or more cubic yards of organic waste per week as of April 1, 2016;
- Four or more cubic yards of organic waste per week as of January 1, 2017; and

- Four or more cubic yards of solid waste per week as of January 1, 2019.

CalRecycle is currently evaluating whether California has achieved its statewide organic disposal goal of reducing organic waste disposal to 50 percent of 2014 levels by 2020. If this goal is not achieved, organic composting and recycling requirements will be expanded such that businesses that generate two or more cubic yards of solid waste per week must comply.

SB 1383: Short-Lived Climate Pollutants

In 2016, Governor Brown signed Senate Bill 1383 into California law, establishing statewide greenhouse gas emission reduction goals:

- By 2020, reduce the amount of organic material disposed in landfills by 50% from the 2014 level, and
- By 2025, reduce the amount of organic material disposed in landfills by 75% from the 2014 level.
- By 2025, no less than 20% of edible food currently disposed must also be recovered for human consumption.

This law expands upon the requirements of AB 341: Mandatory Commercial Recycling and AB 1826: Mandatory Commercial Organics. However, SB 1383 is unique in that it impacts residents in addition to businesses, and it requires some businesses to donate excess edible food to feed people in addition to diverting organic materials from the garbage. As the most aggressive waste reduction law to be adopted in California for the past 30 years, SB 1383 includes significant penalties for non-compliance.

The State has committed to reduce greenhouse gas emissions, improve human health, and create clean jobs that support resilient local economies. Implementing the statewide plan under SB 1383 will reduce short-lived, harmful, super pollutants with significant global warming impacts, and is essential to achieving California's climate goals. Organic waste in landfills emit 20 percent of the state's methane, a climate super pollutant 84 times more potent than carbon dioxide.

Regional

San Francisco Bay Region MS4 Permit

The Municipal Separate Storm Sewer System (MS4) Permit comprehensively regulates activities related to construction sites, industrial sites, illegal discharges, and illicit connections, new development, and municipal operations. The permit also requires a public education program, the implementation of targeted pollutant reduction strategies via green stormwater infrastructure and other stormwater control measures, and a monitoring program to help characterize local water quality conditions and to begin evaluating the overall effectiveness of the permit's implementation.

San Mateo Countywide Water Pollution Prevention Program

The San Mateo Countywide Water Pollution Prevention Program (SMCWPPP), a program of the City/County Association of Governments of San Mateo County (C/CAG) supports the 20 cities and County of San Mateo with regional stormwater regulatory requirements at three primary scales. C/CAG supports its member agencies at the local scale with implementation of jurisdictional requirements, including public outreach, training and annual reporting; at the countywide scale with green stormwater infrastructure planning and water quality monitoring among other activities; and at the regional scale with representation on Regional Municipal Stormwater Permit issues and developing water pollution prevention programs and projects coordinated among the other Bay Area municipalities that are co-permittees under the Municipal Regional Permit.

Local Regulations

Town of Woodside Sanitary Sewer Management Plan (SSMP)

The Town of Woodside manages the Town Center Sewer Assessment District (TCSAD) and the County of San Mateo manages the Fair Oaks Sewer District within the Town. All TCSAD sewage is treated at the Silicon Valley Clean Water Treatment Plant in Redwood City after conveyance through the collection system. The Town ownership includes only the main sewer lines, force main lines and pump stations in the TCSAD. The property owners are fully responsible for installation, maintenance and repair of their private sewer lateral(s) to the connection with the main sewer. Woodside's SSMP was updated in 2022 to establish continued compliance with the Statewide General Waste Discharge Requirements for Sanitary Sewer Systems (GWDR). It is a compendium of the policies, procedures, and activities that are included in the planning, management, operation, and maintenance of the Town's sanitary sewer system.

Town of Woodside Municipal Code

Title V, Chapter 51 and Title XV, Chapter 150.03 of the Town of Woodside Municipal Code regulate sanitary sewer management in the Town. Chapter 51.017 establishes requirements for the prevention of illicit discharges into the wastewater collection system and the extent to which fats, oils, and other debris should be limited. Chapters 51.045, 51.047, and 51.063 require that servers and connections be properly designed and constructed, and rehabilitated sewers be installed properly, inspected, and tested. Chapters 51.062 and 51.100 ensure access for maintenance, inspection, or repairs for portions of the service lateral owned or maintained by the Town. Chapters 150.03, 51.016, 51.046, and 51.101 require the installation of grease removal devices, design standards for the grease removal devices, maintenance requirements, best management practices requirements, and record keeping and reporting requirements. And chapter 51.101 enforces any violation of its sewer ordinances.

Town of Woodside General Plan

Goal PU1. Ensure adequate, safe, and site sensitive utilities.

Policy PU1.1. Ensure adequate utilities by requiring property owners to submit “will serve” letters from the utility providers along with permit applications which include the installation of new utilities.

Policy PU1.2. Install utilities in an environmentally sensitive manner by undergrounding utilities and reviewing plans for their environmental sensitivity.

Policy PU1.3. Ensure continuity of utility services by incorporating “loop systems” and reviewing plans for the minimization of disruption to service.

Policy PU1.3. Coordinate with public utility purveyors through strengthening relationships and improving infrastructure.

Goal PU4: Maintain and improve the adequacy of the water supply.

Policy PU4.1. Maintain and improve the adequacy of the water supply through partnerships, staying up to date on regional water issues, and working towards the improvement of the line size, flow, and storage to meet health and fire safety standards.

Policy PU4.2. Seek adequate maintenance and prompt repair of water supply infrastructure through fostering positive working relationships with the public and private purveyors.

Policy PU4.3. Interconnect water supply infrastructure through partnerships between the Town’s water delivery systems.

Policy PU5.1. Require on-site sewage disposal systems.

Policy PU5.2. Enforce on-site disposal standards.

Policy PU5.3. Consider alternative septic systems by updating regulations and alternative on-site disposal system proposals.

Policy PU5.4. Promote education and outreach about septic design, maintenance, and water conservation practices.

Goal PU5: Encourage and support on-site sewage disposal systems.

Policy PU5.1. Require on-site sewage disposal systems.

Policy PU5.2. Enforce on-site disposal standards.

Policy PU5.3. Consider alternative septic systems.

Goal PU6: Manage and allocate the Town’s limited public sanitary sewer allocations appropriately.

Policy PU6.1. Manage sewer service allocations by determining existing capacity, reducing outflows, and updating regulations.

Policy PU6.2. Seek increased sanitary sewer capacity from the South Bayside System Authority (SBSA).

Policy PU6.3. Conduct environmental review by considering the impacts of sewer construction on drainage, vegetation and trees, soil erosion and geologic hazards and water conservation.

Goal PU7: Promote reduction of water usage and increased conservation of water resources.

Policy PU7.1. Promote Water Conservation through water efficiency measures, water collection systems, water audits, and updating regulations.

Policy PU7.2. Encourage water conservation and wastewater treatment systems through monitoring regulations and developing regulations.

Goal PU8: Manage storm water drainage to minimize erosion and runoff.

Policy PU8.1. Retain storm water runoff by encouraging bioretention and using best management practices.

Policy PU8.2. Utilize natural drainage by reviewing drainage system design and preparing drainage system design guidelines.

Policy PU8.3. Maintain natural drainage ways.

Policy PU8.4. Control erosion, sedimentation, and flooding by reviewing erosion control plans and preparing for winter erosion control.

Impact Analysis

For the purposes of this EIR, a significant impact would occur if implementation of the Proposed Project would:

Criterion 1: 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.

Based on the findings of the Initial Study circulated with the Notice of Preparation, it was determined that impacts related to the following criteria would be less than significant: sufficient water supplies, adequate capacity of wastewater treatment provider, excess solid waste, and compliance with regulations related to solid waste. Accordingly, these criteria are not analyzed further here. The Initial Study is included in Appendix A.

METHODOLOGY AND ASSUMPTIONS

Potential impacts on utilities and service systems are analyzed within the context of existing plans and policies, permitting requirements, local ordinances, the Woodside Municipal Code, and the policies included in the Proposed Project. Development pursuant to the Proposed Project would involve smaller scale infill development in established residential neighborhoods and additional multi-family housing on four key sites to provide varied housing types. Pursuant to CEQA Section 15303, the State has determined that most of the buildout of the Proposed Project (small-scale infill housing, typically of not more than three single-family residences or multi-family residential structures designed for not more than six dwelling units) would not have a significant effect on the environment. Larger scale projects anticipated with buildout of the Proposed Project, including higher density housing at 773 Cañada Road, Raymundo Drive at Runnymede Road, High Road at Woodside Road, and Cañada College, could have an impact on the environment by increasing water and sewer demands depending on configuration.

As described therein, the analysis presented throughout this EIR adequately accounts for the potential environmental impacts of the proposed new residential units.

Relevant Proposed Project Goals and Policies

The following policies from the Draft Housing Element Housing Action Plan are relevant to utilities in Woodside:

Goal H6: Plan for a resilient community. Provide programs to minimize damage from natural disasters and to provide adequate utilities, such as updating the Very High Fire Hazard Severity Zones (VHFHSZ) Map and coordinating with CALWater (California Water Service) to ensure adequate water supplies.

IMPACTS

Impact 3.9-1 **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 (Less than Significant).**

Water

A significant impact would occur if the Proposed Project would require the relocation, construction, or expansion of water utility infrastructure, the implementation of which would result in substantial adverse environmental effects.

Regional Facilities

Water is supplied to the Planning Area by the California Water Service (Cal Water) Bear Gulch District and Redwood City, as displayed on Figure 3.9-1. In 2021, both Cal Water and Redwood City, respectively, have prepared Urban Water Management Plans (UWMP) to ensure that

sufficient water supplies are available to meet existing and future water needs, and that steps are in place should a critical water shortage occur. Cal Water prepared a UWMP for the Bear Gulch District specifically, while Redwood City prepared a UWMP for their service area, which includes parts of Woodside. Both UWMPs accounted for ABAG projections of population, housing, and employment through 2040. As such, implementation of the Proposed Project would not require the construction or expansion of treatment facilities over and above that which is already planned to serve demand in the service area through 2040, and impacts would be less than significant.

Local Conveyance Facilities

Within the Planning Area, water is delivered through distribution mains in most of the major streets. Implementation of the Proposed Project would primarily involve facilitation of smaller-scale development in established residential neighborhoods. As such, there is already water utility infrastructure in place to serve future development needs. The remainder of the sites proposed are comprised of higher density housing at 773 Cañada Road, Raymundo Drive at Runnymede Road, High Road at Woodside Road, and Cañada College. Such developments pursuant to the Proposed Project would be required to install new water mains within the street network to serve fire and domestic water needs. Final sizing of any particular line will be subject to modeling of the system that must rely on water use parameters of any particular project or group of projects once those details are known.

The land use and population projections developed for the Proposed Project and used as the basis for technical modeling in this EIR account for the construction of this new local conveyance infrastructure. Therefore, the environmental impacts related to construction period traffic, noise, air quality, and GHG emissions have been considered throughout this EIR at a programmatic level.

As such, compliance with existing regulations and implementation of Proposed Project policies would reduce impacts to the maximum extent practicable. Overall, buildout of the Proposed Project would result in less than significant impacts related to the provision of water treatment and conveyance facilities.

Wastewater

A significant impact would occur if the Proposed Project would require the construction or relocation of wastewater treatment facilities which could cause significant environmental effects.

Regional Facilities

Wastewater from the Fair Oaks and Town Center public sanitary sewer districts is treated at the Silicon Valley Clean Water (SVCW) Wastewater Treatment Plant (WWTP) in Redwood City after conveyance through the collection system. The wastewater at the SVCW WWTP undergoes primary, secondary (activated sludge), dual media filtration, disinfection, and dechlorination treatment before being discharged to a deep-water outfall in the San Francisco Bay. The SVCW

WWTP has a capacity to treat 29.5 million gallons per day (MGD), but currently receives approximately 20.0 MGD from customers in the SVCW service area.⁶

As stated in the Environmental Setting, the two public sanitary sewer districts, the County of San Mateo Fair Oaks District, and Woodside's Town Center Sewer District, serve 550 and 180 existing connections throughout Woodside, respectively. In the 2023 Sewer Rate Study for Town Center Sewer Assessment District (TCSAD), the estimated average sewer flow per residence is 150 gpd.⁷ Therefore, at 730 connections at 150 gallons per day, the total district collection in Woodside is approximately 109,500 gallons per day. The total contractual capacity for the Fair Oaks District within Woodside and the Town Center Sewer District is 250,000 gallons per day. As such, the districts are currently operating at 44 percent of their total capacity. The Proposed Project could involve development of at least 49 new housing units by 2031 needing wastewater treatment, which could increase wastewater production by 7,350 gallons per day. This increase represents less than 3 percent of total district capacity and is well within remaining capacity. Therefore, the Proposed Project would not require or result in the construction or relocation of new or expanded regional wastewater treatment facilities, and impacts would be less than significant.

Local Sanitary Sewer Facilities

About 28 percent of the developed parcels in town are currently served by a public sanitary sewer system, according to the Woodside General Plan Public Facilities Element. As displayed in Figure 3.9-2, areas of Woodside that are served by or are eligible to connect to a public sewer system are in the central, northern, and eastern parts of Woodside, while the rest of the Town, depicted in yellow, utilize private on-site septic systems to handle sanitary waste.

Development under the Proposed Project that would require a connection to an existing public sewer system includes the 773 Cañada Road and Raymundo Drive sites. Both sites are eligible to connect to the Town Center Sewer Assessment District (TCSAD), where the Proposed Project anticipates 16 units on 773 Cañada Road and 17 units on Raymundo Drive for a total of 33 units.⁸ According to the Housing Element, the contractual capacity of the TCSAD is 100,000 gallons per day (gpd). The District currently processes 40,000 gpd; therefore, a capacity of 60,000 gpd remains. In the 2023 Sewer Rate Study for TCSAD, the estimated average sewer flow per residence is 150 gpd.⁹ The Proposed Project could involve development of up to 33 new housing units in the TCSAD, which could total an increase of 4,950 gpd. Given that the TCSAD has a capacity of 60,000 gpd, the Proposed Project represents a small increase with respect to the total available capacity. Therefore, the Proposed Project would not require or result in the construction or relocation of new or expanded Town wastewater treatment facilities, and impacts would be less than significant.

⁶ California Water Service (Cal Water), 2021. 2020 Urban Water Management Plan – Bear Gulch District. Available: https://www.calwater.com/docs/uwmp2020/BG_2020_UWMP_FINAL.pdf. Accessed: February 14, 2024.

⁷ Town of Woodside, 2023. 2023 Sewer Rate Study, Town Center Sewer Assessment District. Available: <https://www.woodsideca.gov/AgendaCenter/ViewFile/Item/83?fileID=339>. Accessed: February 15, 2024.

⁸ Town of Woodside 6 Cycle Housing Element, 2023.

⁹ Town of Woodside, 2023. 2023 Sewer Rate Study, Town Center Sewer Assessment District. Available: <https://www.woodsideca.gov/AgendaCenter/ViewFile/Item/83?fileID=339>. Accessed: February 15, 2024.

Stormwater

A significant impact would occur if the Proposed Project would require the construction or relocation of stormwater drainage infrastructure which could cause significant environmental effects. The storm drain system in the Town of Woodside consists primarily of open ditches, and some culverts, which flow through private properties and public rights-of-way with limited sections of concrete-lined channels and pipes. The Town maintains drainage systems located within the public right-of-way.

Future developments within the Planning Area must meet the requirements of the San Mateo County Water Pollution Prevention Program (SMCWPPP) as well as applicable State and Town requirements described above. SMCWPPP implements permit compliance tasks and tracks stormwater regulations on behalf of the member agencies, including the Town of Woodside, which share a common National Pollutant Discharge Elimination System (NPDES) permit. New development and redevelopment, as defined by Provision C.3.b.ii of the Municipal Regional Stormwater Permit, involving more than 10,000 square feet or more of impervious surfaces, could be required to incorporate on-site methods to result in no net increase in drainage off-site compared to pre-project site hydrology; these methods could include low impact development techniques that filter, store, evaporate, and detain runoff close to the source of rainfall and control the rate and/or volume of stormwater, allowing stormwater to naturally infiltrate soils.

Additionally, the Woodside Municipal Code outlines design standards and requirements for drainage in Section 151.43. The ordinance lists provisions to properly dispose of surface waters and to prevent such surface waters from damaging the face of an excavation or portion of a fill. These provisions outline that all drainage facilities should be designed to carry waters to the nearest practicable drainage way approved by the Town Engineer as a safe place to discharge such waters, and all driveways should have a minimum cross slope of three percent to prevent erosion and ponding on the roadside and road surface. Additionally, Section 152.116(A) of the Municipal Code also stipulates the design of drainage facilities shall conform to the Town's Storm Drainage Master Plan and Town's drainage requirements, and areas draining into the development shall be outlined on a map submitted to Town with drainage calculations. Development under the Proposed Project would be required to adhere to regulations in the Municipal Code, which would properly dispose of surface water through adequate drainage facilities and not need the construction or relocation of stormwater drainage infrastructure.

Further, the Woodside General Plan Public Utilities Element discusses various policies and strategies to manage storm water drainage (Goal PU8). Policies set out to retain stormwater runoff (Policy PU8.1) and utilize natural drainage (Policy PU8.2) by requiring vegetated swales, bioretention areas, flow-through planter boxes, and turf blocks to direct and treat storm water, as well as encouraging the incorporation of natural drainage channels as part of the drainage and landscape design. The aforementioned General Plan policies and strategies aim to minimize stormwater runoff, which would lessen the need for construction or relocation of stormwater drainage infrastructure.

Development pursuant to the Proposed Project would need to comply with these requirements, which would minimize the increase in stormwater volume and velocity to the maximum extent practicable. Therefore, through compliance with stormwater regulations and implementation of Proposed Project policies, there would be a less than significant impact on stormwater facilities.

Power and Telecommunications

A significant impact would occur if the Proposed Project would require the construction or relocation of power and telecommunications infrastructure which could cause significant environmental effects. Peninsula Clean Energy (PCE) provides electricity from clean energy sources, while Pacific Gas and Electricity (PG&E) owns the power lines and delivers the power generated by PCE. PCE and PG&E are expected to be able to meet overall demand for electricity and natural gas for all its customers, including San Mateo County, in the future.¹⁰ PG&E will continue to maintain and upgrade the electrical and natural gas distribution systems as needed based on future demand trends. For electricity, this includes local and regional distribution lines, undergrounding or poles where needed, and transformer stations. For natural gas, this includes local and regional pipelines and transmission stations within the Planning Area, such as High Road. Further, the total housing units in San Mateo County in 2022 comprised of 287,401 housing units.¹¹ The Project would add 423 units to the Planning Area over the next eight years, which would total 287,824 housing units, and would be 0.14 percent increase from existing San Mateo County units, representing a minimal increase. Therefore, it is anticipated that the Proposed Project would not result in the relocation or construction of new or expanded electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.

However, development under the Proposed Project could involve construction on the Town-owned site on High Road, located parallel to Highway 84/Woodside Road, which is adjacent to a PG&E gas transmission line in the public right-of-way. As such, potentially significant safety impacts could occur if construction pursuant to the Proposed Project impacts the transmission line. In order to prevent such impacts from happening, PG&E takes a proactive approach to reducing the risk of loss of containment or the unintended release of natural gas. Mitigation programs are outlined in their 2023 Gas Safety Plan and ensure that any new construction minimizes the risk of loss of containment to the greatest extent possible.¹² Damage Prevention includes marking the field location of underground facilities which is governed by California Government Code Section 4216 et seq. The Locate and Mark Program is also designed to mitigate the potential risk of damage to underground facilities by identifying and marking assets for potential excavators within a 48-hour window. Federal pipeline safety regulations and California state law require that PG&E belong to, and share the cost of operating, the regional “one-call” notification system. Builders, contractors, and others planning to excavate, must use this system to notify underground facility owners, like PG&E, of their plans to excavate. PG&E then provides the excavators with information about the location of its underground facilities, including natural gas, electric, and fiber optic. As such, with compliance of existing federal, State, and local regulations as well as PG&E protocols described above, Proposed Project impacts on transmission lines would be less than significant.

¹⁰ Pacific Gas & Electric Corporation (PG&E). 2023 General Rate Case. Available: https://www.pge.com/en_US/about-pge/company-information/regulation/general-rate-case/grc.page. Accessed: February 9, 2024.

¹¹ United States Census Bureau, 2024. Table B25001 Housing Units. Available: <https://data.census.gov/table/ACSDT1Y2022.B25001?q=Housing%20units&g=050XX00US06081>. Accessed: March 5, 2024.

¹² Pacific Gas & Electric Corporation (PG&E). 2023 Gas Safety Plan. Available: https://www.pge.com/assets/pge/docs/about/pge-systems/PDF_GasPipelineSafetyOIR_Report_PGE_20230315.pdf. Accessed: February 9, 2024.

In addition, the need for telecommunication systems will likely grow with development pursuant to the Proposed Project. The facilities and networks for these telecommunication services are presently provided by a number of private firms that will expand as consumer demand continues to grow. According to the California Public Utilities Commission, local telecommunication companies have anticipated at least this level of growth in its long-range service planning process.¹³ Therefore, it is anticipated that the Proposed Project would not require or result in the relocation or construction of new or expanded telecommunications facilities, the construction or relocation of which could cause significant environmental effects.

Overall, buildout of the Proposed Project would result in less than significant impacts related to the provisions of power and telecommunications facilities.

Mitigation Measures

None required.

¹³ California Public Utilities Commission, Communications Division, Internet and Phone. Available: <https://www.cpuc.ca.gov/industries-and-topics/internet-and-phone>. Accessed: February 9, 2024.

3.10 Wildfire

This section describes the environmental and regulatory setting for wildfires. It also describes events related to wildfires that have already occurred in the Planning Area and that could occur during implementation of the Proposed Project. A wildland fire is a fire in which the primary fuel is natural vegetation and can consume thousands of acres of vegetation, timber, and agricultural lands, as well as developed properties located in or adjacent to susceptible areas. Wildfires can be caused by human actions as well as natural events, such as lightning or high winds.

Eight responses were received from the Notice of Preparation comment period as it relates to wildfire. Midpeninsula Regional Open Space District (Midpen) submitted a letter requesting the EIR study if defensible space can be maintained around structures on the Town's recommended housing sites and if any new fuel breaks are needed to protect new housing. If fire clearance extends into Midpen preserves, this would result in an ongoing impact to the environment, since defensible space needs to be maintained. Topics presented in public comment letters include concern about building housing near Wildland Urban Interface (WUI) areas and requesting that buffer zones be implemented. Other commenters expressed concerns about roadway congestion and requested that sites be evaluated to ensure there are sufficient evacuation routes. These comments are all addressed in the following Impact Analysis.

Environmental Setting

PHYSICAL SETTING

A wildland fire is a fire in which the primary fuel is natural vegetation and can consume thousands of acres of vegetation, timber, and agricultural lands, as well as developed properties located in or adjacent to susceptible areas. Wildfires can be caused by natural events, such as lightning or high winds. Most wildfires in the United States are caused by humans (89 percent on average from 2017 to 2021), although wildfires caused by lightning tend to be slightly larger and burn more acreage (52 percent of the average acreage burned from 2017 to 2021 was ignited by lightning).¹

Many areas of San Mateo County, including the Town of Woodside and surrounding areas, are highly vulnerable to large wildfires due to the mountainous topography and types of vegetation present, especially in less developed areas with large lot homes sites with extensive areas of un-irrigated vegetation. Summer cabins adjacent to wildland have since turned into year-round

¹ Congressional Research Service. November 2022. Wildfire Statistics. Available: <https://sgp.fas.org/crs/misc/IF10C244.pdf>. Accessed: April 27, 2023.

residential subdivisions of mostly single-family homes with an increased density of structures. A combination of increased home building and limited vegetation management since the 1970s has resulted in an overgrown landscape and uncharacteristically large fuel loads in the area. This increased fuel load has led to an increase in the prevalence of larger and more dangerous wildfires in the County.²

The Santa Cruz mountains, which form a ridge down the San Francisco Peninsula separating the Pacific Ocean from the San Francisco Bay and the Santa Clara Valley, are conducive to periodic large wildfire events due to the types of vegetation present and wind patterns. Vegetation is dominated by dense conifer stands with forest floor accumulations of litter and downed woody material in addition to coastal scrub communities. Historically, the most common months for wildfires in the Bay Area are in August, September, and October. Northern California Diablo winds are most common in the late summer through early winter. These winds are warm and lower the relative humidity of the area while drying out vegetation. It is under these wind regimes that California typically experiences its largest and most destructive fires.³

Recent research indicates that higher summer temperatures will likely increase the area burned and fire severity in California, particularly in Northern California.⁴ Future changes in fire frequency and severity are difficult to predict; however, regional climate change associated with elevated greenhouse gas concentrations could alter larger weather patterns and produce conditions conducive to extreme fire behavior. A warmer climate will bring drier winters, higher spring temperatures, and early snowmelt. Combined with drought conditions, this leads to drier soils in early summer, drier vegetation, and an increase in the number of days in the year with flammable fuels, all which further raise the likelihood and severity of fires throughout the year.⁵

Local climatic, geographic, and topographic conditions are likely to adversely affect fire prevention efforts in Woodside. Precipitation in the town ranges from less than 10 inches in drought years to 40 inches in hillside areas in wet years, with an average of 23 inches or 24 inches per year. Over 90 percent of the rainfall typically falls November through April. Humidity generally ranges from 50 percent during daytime to 70 percent at night, but occasionally drops to 50 percent during the summer months. Average summer high temperatures are in the 70s to 90s and occasionally reach 100 degrees Fahrenheit or greater. Prevailing winds are generally from the west to northwest. However, winds originate in virtually every direction at one time or another. The town contains significant areas of steep slopes, particularly in the western hills of the Santa Cruz mountains. The

² San Mateo-Santa Cruz Unit 2020 Strategic Fire Plan. May 2020. CAL Fire. Available: <https://osfm.fire.ca.gov/media/b53pplzq/2020-czu-fire-plan.pdf>. Accessed: April 27, 2023.

³ FIRE Safe Marin. December 2020. Marin County Community Wildfire Protection Plan. Available: https://secureservercdn.net/72.167.25.213/j0i.68d.myftpupload.com/wp-content/uploads/CWPP_2020_Final_1-4-2021_FSM_published.pdf. Accessed: April 27, 2023.

⁴ Westerling A.L. August 2018. Wildfire Simulations for California's Fourth Climate Change Assessment: Projecting Changes in Extreme Wildfire Events with a Warming Climate. Available: https://www.energy.ca.gov/sites/default/files/2019-11/Projections_CCCA4-CEC-2018-014_ADA.pdf. Accessed: April 27, 2023.

⁵ FIRE Safe Marin. December 2020. Marin County Community Wildfire Protection Plan. Available: https://secureservercdn.net/72.167.25.213/j0i.68d.myftpupload.com/wp-content/uploads/CWPP_2020_Final_1-4-2021_FSM_published.pdf. Accessed: April 27, 2023.

steep topography of the town as well as geologic constraints serves to limit access to emergency vehicles and may enhance the potential for fire to spread quickly.

Wildland Urban Interface (WUI) Zones

The Wildland Urban Interface (WUI) is the transition zone between areas of native vegetation and developed areas. San Mateo County has 39 square miles of WUI with 33 percent of it having homes.⁶ The term “WUI” is not a designation of potential wildfire severity but a defined description of an area where urban development meets undeveloped lands at risk of wildfires. Because of the mix and density of structures with natural fuels in close proximity to each other, combined with more limited access and egress routes, fire management is more complex in WUI environments. In San Mateo County specifically, many of the access roads within the WUI are narrow and winding and are often on hillsides with overgrown vegetation. This makes it even more difficult and costly to reduce fire hazards, fight wildfires, and protect homes and lives in these areas. Figure 3.10-1 shows the WUI areas in San Mateo County as identified in the Santa Cruz and San Mateo County Multi-Jurisdictional Local Hazard Mitigation Plan (LHMP). There are approximately 1,500 acres of WUI areas within the Town of Woodside. The portions of town adjacent and north of Highway 84 contain the most WUI areas, but small pockets in the southern portion of Woodside, such as just south of Portola Road, contain WUI areas as well.

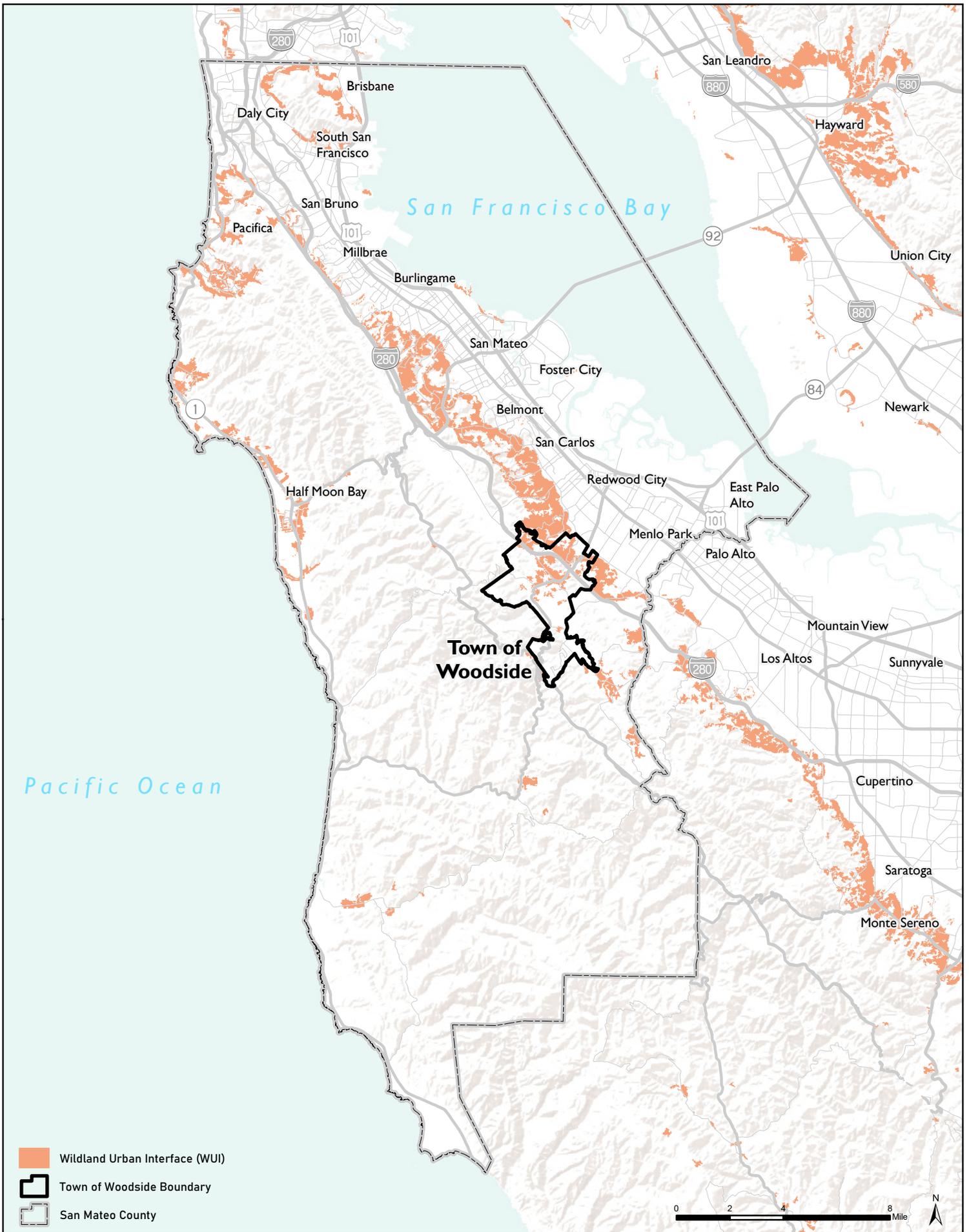
Slope and Aspect

According to CAL FIRE, sloping land increases susceptibility to wildfire because fire typically burns faster up steep slopes and they may hinder firefighting efforts.⁷ Following severe wildfires, sloping land is also more susceptible to landslide or flooding from increased runoff during substantial precipitation events. Aspect is the direction that a slope faces, and it determines how much radiated heat the slope will receive from the sun. Slopes facing south to southwest will receive the most solar radiation; thus, they are warmer and the vegetation drier than on slopes facing a northerly to northeasterly direction, increasing the potential for wildfire ignition and spread.⁸

⁶ Community Wildfire Protection Plan. CAL FIRE – Santa Cruz Unit. April 2018. Available: https://www.cfsfire.org/wp-content/uploads/2019/03/2018_CWPP_update_final_v2_reduced.pdf. Accessed: April 27, 2023.

⁷ CAL FIRE 2007b.

⁸ Anthony Leroy Westerling, UC Merced. August 2018. Wildfire Simulations for California’s Fourth Climate Change Assessment: Projecting Changes in Extreme Wildfire Events with a Warming Climate. Available: https://www.energy.ca.gov/sites/default/files/2019-11/Projections_CCCA4-CEC-2018-014_ADA.pdf. Accessed : April 27, 2023.



3.10-1 Wildland Urban Interface (WUI) in San Mateo County

Source: California Department of Forestry and Fire Protection, 2019; Dyelt & Bhatia, 2024

San Mateo County lies on the western shore of San Francisco Bay. Shelter from the Pacific Ocean by the Santa Cruz Mountains creates a mostly mild environment. Gaps in the mountains (such as the San Bruno Gap and the Crystal Springs Gap) can channel ocean weather, resulting in strong winds at times. Elevation throughout San Mateo County and neighboring Santa Cruz County varies from the high point of Loma Prieta (3,806 feet) to sea level.

Historical Wildfires

Due to local topography, fuels (forest, chaparral and grasslands), and certain weather conditions, the Santa Cruz Mountains are conducive to periodic large wildfire events. Historically, the Santa Cruz Mountains would have burned on a decadal basis creating a patchwork of burned and unburned areas. Before European occupation, smaller fires would burn forest understory, leaving large old-growth redwoods untouched, and fire prevented shrubs and Douglas fir from encroaching grassland. In more recent years, with fire suppression, the introduction of exotic plant species, and inadequate forest management, uncharacteristically high fuel loads have developed throughout San Mateo County. Before the 2008 Summit Fire and 2009 Lockheed Fire, San Mateo County had not seen significant fire activity since the 1940's.⁹ The difference in fire activity in that 60-year time span can be attributed to changes in forest management, extended fire regimes, aggressive firefighting, and population growth.¹⁰ A recent large wildfire close to the Woodside area (three miles from the Town of Woodside) was caused by lightning and burned 50 acres, starting on September 11, 2017, and contained by September 18, 2017. There were no structures damaged and no injuries reported. The fire was fueled by ample vegetation in steep terrain difficult for firefighters to access and locate the source of.¹¹ More recently, another smaller incident caused by brush fire was the 2022 Edgewood Fire. It burned 20 acres close enough to homes in Woodside and Redwood City to force evacuation orders but caused no damage or injuries. The last major wildfire in San Mateo County was the 2020 CZU Lightning Complex Fire which burned from the southern border of San Mateo County to the town of Felton. It burned 86,509 acres, killed one person, and destroyed 1,490 buildings.

WILDFIRE HAZARDS

Primary responsibility for preventing and suppressing wildland fires in San Mateo County is divided between local firefighting agencies and the State of California Department of Forestry and Fire Protection (CAL FIRE). In State Responsibility Areas (SRAs), which are defined according to land ownership, population density, and land use, CAL FIRE has a legal responsibility to provide fire protection. CAL FIRE is not responsible for densely populated areas, incorporated cities,

⁹ Fire Safe San Mateo County. 2023. San Mateo's History of Fire. Available:

<https://www.firesafesanmarateo.org/resources/fire-history> Accessed: February 14, 2024

¹⁰ CalFire. May 2022. San Mateo- Santa Cruz Unit. 2022 Strategic Fire Plan. Available: <https://34c031f8-c9fd-4018-8c5a-4159cdf6b0d-cdn-endpoint.azureedge.net/-/media/osfm-website/what-we-do/community-wildfire-preparedness-and-mitigation/fire-plan/2022-san-mateo-santa-cruz-san-fransisco-unit-fire-plan.pdf?rev=105ed3e9e3b546d8bfe6f333ce265620&hash=45765A17355303D61888AB18EBA1D805>. Accessed: February 14, 2024

¹¹ Half Moon Bay Review. September 18, 2017. Skeggs Fire Fully Contained. Available:

https://www.hmbreview.com/skeggs-fire-fully-contained/article_4e50e544-9c9d-11e7-bf06-7bd85df98237.html

Accessed: February 14, 2024

agricultural lands, or federal lands. Local Responsibility Areas (LRAs) include incorporated cities and cultivated agriculture lands. In LRAs, fire protection is provided by local fire departments, fire protection districts, or counties, or by CAL FIRE under contract to local government. The Town of Woodside is currently located in an area identified as a Local Responsibility Area (LRA) which is serviced by the Woodside Fire Protection District.

CAL FIRE has identified areas, or zones, of Very High Fire Hazard severity potential under the Fire and Resources Assessment Program (FRAP). These zones are mapped and identified based on expected burn probabilities, potential fuels over a 30-to-50-year time period, and their correlated expected fire behavior, to better predict the possible vegetation fire exposure to buildings and developments. Under the FRAP, CAL FIRE has mapped about half of the western portion of Woodside as a Very High Fire Hazard Severity Zone (VHFHSZ), particularly near Teague Hill Open Space Preserve, Wunderlich Park, and Sky Londa Neighborhood (Figure 3.10-2). New buildings proposed in any LRA Very-High Fire Hazard Severity Zone or any Wildland-Urban Interface area are required to comply with California Building Code regulations that stipulate materials and construction methods required in areas of exterior wildfire exposure, including vegetation management practices, non-combustible and fire-retardant materials, and ignition-resistant construction.

REGULATORY SETTING

Federal

The Disaster Mitigation Act of 2000

The Disaster Mitigation Act of 2000 requires a state-level mitigation plan as a condition of disaster assistance. There are two different levels of state disaster plans: “Standard” and “Enhanced.” States that develop an approved Enhanced State Plan can increase the amount of funding available through the Hazard Mitigation Grant Program. The Act also established new requirements for local mitigation plans.

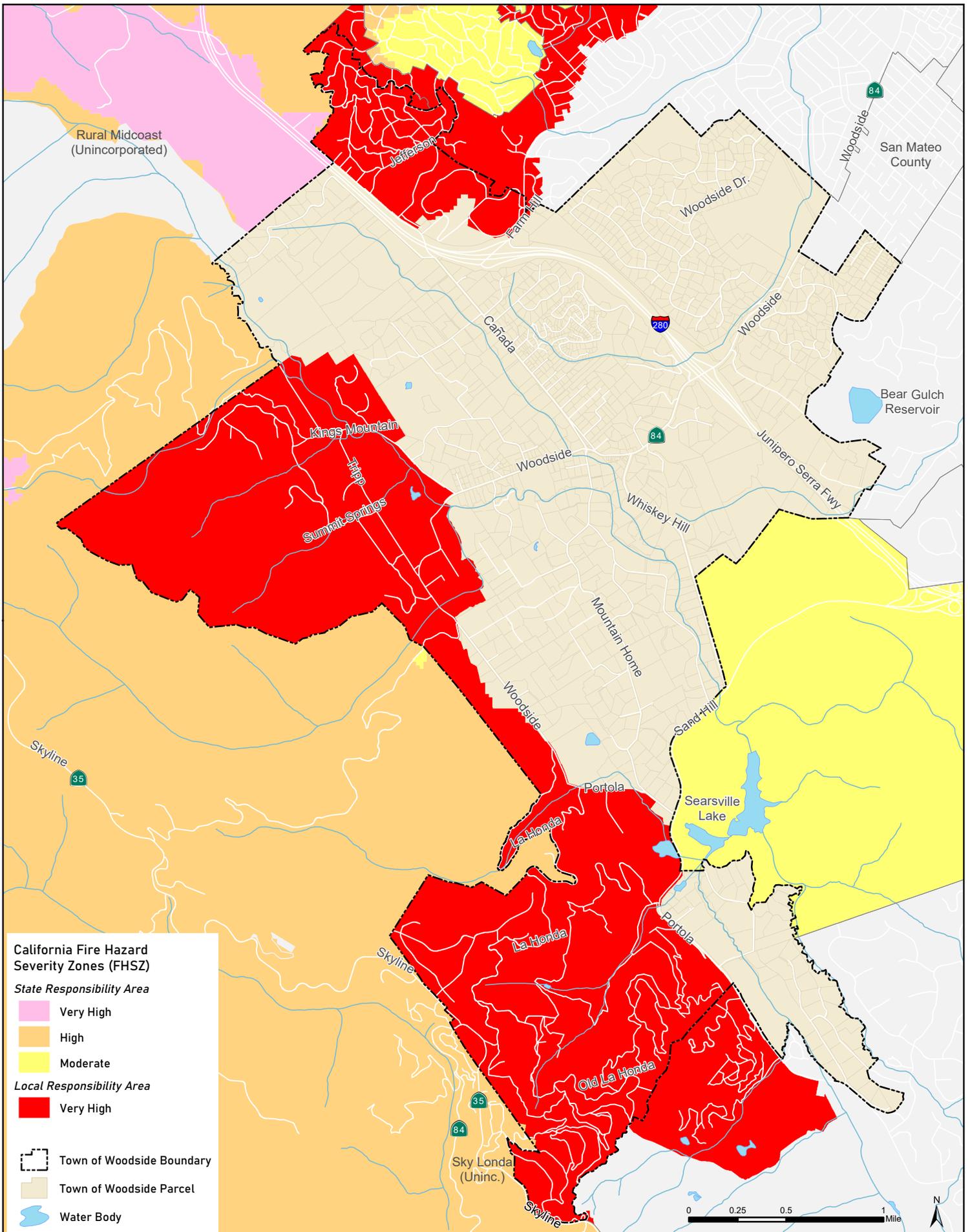
National Fire Plan

The National Fire Plan was developed in August 2000, following a historic wildfire season. Its intent is to establish plans for active response to severe wildfires and their impacts on communities while ensuring sufficient firefighting capacity. The plan addresses firefighting, rehabilitation, hazardous fuels reduction, community assistance, and accountability.

State

California Office of Emergency Services (OES)

Under the California Emergency Services Act, the State developed an emergency response plan to coordinate emergency services provided by all governmental agencies. The plan is administered by the California Office of Emergency Services (OES).



3.10-2 Wildfire Hazard Severity Zones

Town of Woodside

Source: CAL FIRE, 2024; Dyett & Bhatia, 2024

OES coordinates the responses of other agencies, including EPA, the Federal Emergency Management Agency (FEMA), the California Highway Patrol (CHP), regional water quality control boards, air quality management districts, and county disaster response offices. Local emergency response teams, including fire, police, and sheriff's departments, provide most of the services to protect public health.

OES prepares the State of California Multi-Hazard Mitigation Plan (SHMP). The SHMP identifies hazard risks and includes a vulnerability analysis and a hazard mitigation strategy. The SHMP is federally required under the Disaster Mitigation Act of 2000 for the State to receive Federal funding. The Disaster Mitigation Act of 2000 requires a state mitigation plan as a condition of disaster assistance.

California Public Resources Code – State Responsibility Area

The California Public Resources Code (PRC) requires the designation of State Responsibility Areas (SRAs), which are identified based on cover, beneficial water uses, probable erosion damage, and fire risks and hazards. The financial responsibility of preventing and suppressing fires in an SRA is primarily the responsibility of the state. Fire protection in areas outside SRAs are the responsibilities of local or federal jurisdictions and are referred to as local responsibility areas and federal responsibility areas, respectively.

California Public Resources Code Sections 4201–4204

This portion of the PRC, most recently amended by AB 9 in 2021, requires the State Fire Marshal to classify Fire Hazard Severity Zones within SRAs. Lands within SRAs are classified in accordance with the severity of fire hazard present to identify measures to be used to retard the rate of spreading and reduce the potential intensity of uncontrolled fires that threaten to destroy resources, life, or property.

Very High Fire Hazard Severity Zones

Government Code Section 51178 requires CAL FIRE to identify very high Fire Hazard Severity Zones in the state. Very high Fire Hazard Severity Zones shall be based on fuel loading, slope, fire weather, and other relevant factors including areas where Santa Ana, Mono, and Diablo winds have been identified by CAL FIRE as a major cause of wildfire spread. Government Code Section 51179 requires a local agency to designate, by ordinance, very high Fire Hazard Severity Zones in its jurisdiction. As shown on Figure 3.10-2, CAL FIRE has mapped about half of the western portion of Woodside as a Very High Fire Hazard Severity Zone (VHFHSZ), particularly near Teague Hill Open Space Preserve, Wunderlich Park, and Sky Londa Neighborhood.

California Board of Forestry

The Board of Forestry maintains fire safe road regulations, as part of Title 14 of the California Code of Regulations (CCR). This includes requirements for road width, surface treatments, grade, radius, turnarounds, turnouts, structures, driveways, and gate entrances. These regulations are intended to ensure safe access for emergency wildland fire equipment and civilian evacuation.

California Fire and Building Codes (2022)

The California Fire Code is Chapter 9 of CCR Title 24. It establishes the minimum requirements consistent with nationally recognized good practices to safeguard public health, safety, and general welfare from the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises, and to provide safety and assistance to firefighters and emergency responders during emergency operations. It is the primary means for authorizing and enforcing procedures and mechanisms to ensure the safe handling and storage of any substance that may pose a threat to public health and safety. The California Fire Code regulates the use, handling, and storage requirements for hazardous materials at fixed facilities. The California Fire Code and the California Building Code (CBC) use a hazard classification system to determine what protective measures are required to protect fire and life safety. These measures may include construction standards, separations from property lines and specialized equipment. To ensure that these safety measures are met, the California Fire Code employs a permit system based on hazard classification. The provisions of this Code apply to the construction, alteration, movement, enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal, and demolition of every building or structure or any appurtenances connected or attached to such building structures throughout California.

More specifically, the Fire Code is included in Title 24 of the CCR. Title 24, part 9, Chapter 7 addresses fire-resistances-rated construction; CBC (Part 2), Chapter 7A addresses materials and construction methods for exterior wildfire exposure; Fire Code Chapter 8 addresses fire related Interior finishes; Fire Code Chapter 9 addresses fire protection systems; and Fire Code Chapter 10 addresses fire related means of egress, including fire apparatus access road width requirements. Fire Code Section 4906 also contains existing regulations for vegetation and fuel management to maintain clearances around structures. These requirements establish minimum standards to protect buildings located in Fire Hazard Severity Zones (FHSZs) within SRAs and Wildland-Urban Interface (WUI) Fire Areas. This code includes provisions for ignition-resistant construction standards for new buildings.

Wildland-Urban Interface Building Standards

On September 20, 2007, the Building Standards Commission approved the Office of the State Fire Marshal's emergency regulations amending the CCR Title 24, Part 2, known as the 2007 CBC. These codes include provisions for ignition-resistant construction standards in the WUI. Interface zones are areas with dense housing adjacent to vegetation that can burn and meeting the following criteria:

- Housing density class 2 (one house per 20 acres to one house per 5 acres), 3 (more than one house per 5 acres to one house per acre), or 4 (more than one house per acre)
- In moderate, high, or very high Fire Hazard Severity Zone
- Not dominated by wildland vegetation (i.e., lifeform not herbaceous, hardwood, conifer, or shrub)
- Spatially contiguous groups of 30-meter cells¹² that are 10 acres and larger

¹² Note that "30-meter cells" refers to raster data, and indicates data is presented as 30-meter by 30-meter squares.

Intermix zones are housing development interspersed in an area dominated by wildland vegetation and must meet the following criteria:

- Not interface
- Housing density class 2
- Housing density class 3 or 4, dominated by wildland vegetation
- In moderate, high, or very high Fire Hazard Severity Zone
- Improved parcels only
- Spatially contiguous groups of 30-meter cells 25 acres and larger

Influence zones have wildfire-susceptible vegetation up to 1.5 miles from an interface zone or intermix zone.¹³

The California Fire Plan

The Strategic Fire Plan for California is the State’s road map for reducing the risk of wildfire. The most recent version of the Plan was finalized in August 2018 and directs each CAL FIRE Unit to revise and update its locally-specific Fire Management Plan. These plans assess the fire situation within each of the 21 CAL FIRE units and six contract counties. These plans address wildfire protection areas, initial attack success, assets and infrastructure at risk, pre-fire management strategies, and accountability within their geographical boundaries.

State Emergency Plan

The foundation of California’s emergency planning and response is a statewide mutual aid system which is designed to ensure that adequate resources, facilities, and other support is provided to jurisdictions whenever their own resources prove to be inadequate to cope with a given situation.

The California Disaster and Civil Defense Master Mutual Aid Agreement (California Government Code Sections 8555–8561) requires signatories to the agreement to prepare operational plans to use within their jurisdiction, and outside their area. These plans include fire and non-fire emergencies related to natural, technological, and war contingencies. The State of California, all State agencies, all political subdivisions, and all fire districts signed this agreement in 1950.

The “California Emergency Services Act,” in Section 8568 of the California Government Code, states that “the State Emergency Plan shall be in effect in each political subdivision of the state, and the governing body of each political subdivision shall take such action as may be necessary to carry out the provisions thereof.” The Act provides the basic authorities for conducting emergency operations following the proclamations of emergencies by the Governor or appropriate local authority, such as a City Manager or County Administrator. The provisions of the act are further reflected and expanded on by appropriate local emergency ordinances. The Act further describes the function and operations of government at all levels during extraordinary emergencies, including war.

¹³ CAL FIRE 2019b.

All local emergency plans are extensions of the State of California Emergency Plan. The State Emergency Plan conforms to the requirements of California's Standardized Emergency Management System (SEMS), which is the system required by Government Code 8607(a) for managing emergencies involving multiple jurisdictions and agencies. The SEMS incorporates the functions and principles of the Incident Command System (ICS), the Master Mutual Aid Agreement, existing mutual aid systems, the operational area concept, and multi-agency or inter-agency coordination. Local governments must use SEMS to be eligible for funding of their response-related personnel costs under state disaster assistance programs. The SEMS consists of five organizational levels that are activated as necessary, including: field response, local government, operational area, regional, and state. OES divides the state into several mutual aid regions. The Town of Woodside is located in Mutual Aid Region II, which includes Del Norte, Humboldt, Mendocino, Sonoma, Lake, Napa, Marin, Solano, Contra Costa, San Francisco, San Mateo, Alameda, Santa Clara, Santa Cruz, San Benito, and Monterey Counties.

Government Code Sections 65302 and 65302.5, Senate Bill 1241 (Kehoe) of 2012

Senate Bill (SB) 1241 requires cities and counties to address fire risk in SRAs and Very High FHSZs in the safety element of their general plans. The bill also amended CEQA to direct amendments to the CEQA Guidelines Appendix G environmental checklist to include questions related to fire hazard impacts for projects located in or near lands classified as SRAs and Very High FHSZs. In adopting these Guidelines amendments, the Governor's Office of Planning and Research recognized that generally, low-density, leapfrog development may create higher wildfire risks than high-density, infill development.¹⁴

California Public Utilities Commission General Order 166

General Order 166 Standard 1.E requires that investor-owned utilities (IOU) develop a Fire Prevention Plan which describes measures that the electric utility will implement to mitigate the threat of power-line fires generally. Additionally, this standard requires that IOUs outline a plan to mitigate power line fires when wind conditions exceed the structural design standards of the line during a Red Flag Warning in a high fire threat area. Fire Prevention Plans created by IOUs are required to identify specific parts of the utility's service territory where the conditions described above may occur simultaneously. Standard 11 requires that utilities report annually to the California Public Utilities Commission (CPUC) regarding compliance with General Order 166. In compliance with Standard 1.E of this General Order, Pacific Gas and Electric Company (PG&E) adopted a Wildfire Mitigation Plan Update dated February 25, 2022.¹⁵ PG&E developed a High Fire Risk Area (HFRA) map that designates areas of Woodside as Tier 2 and Tier 3 High Fire Threat Districts (HFTD). Tier 2 and Tier 3 HFTDs are intended to identify areas where stricter fire-safety regulations are to be applied from wildfires associated with overhead utility power lines and overhead utility power-line facilities.

¹⁴ "Leapfrog development" describes the construction of new development at a distance from existing developed areas, with undeveloped land between the existing and new development.

¹⁵ Pacific Gas and Electric. Wildfire Mitigation Plan. February 2023. Available: https://www.pge.com/pge_global/common/pdfs/safety/emergency-preparedness/natural-disaster/wildfires/wildfire-mitigation-plan/2023-wildfire-mitigation-plan.pdf. Accessed: April 28, 2023.

Residential Property Resale Inspection

As of 2021, State Code requires a seller of real property located in a High or Very High Fire Hazard Severity Zone (FHSZ) within the State Responsibility Area (SRA) or Local Responsibility Area (LRA), to provide the buyer with documentation stating the property is in compliance. The law also requires that if documentation demonstrating compliance cannot be obtained by the close of escrow, a written agreement showing that the buyer agrees to obtain documentation of compliance to either PRC 4291 for properties within the SRA, or a local ordinance for properties within jurisdictions that have enacted an ordinance, within one year of the close of escrow.

Regional

CAL FIRE San Mateo-Santa Cruz Unit (CZU) Strategic Fire Plan

The 2022 CAL FIRE San Mateo-Santa Cruz Unit (CZU) Strategic Fire Plan identifies and prioritizes pre-fire and post-fire management strategies and tactics meant to reduce risks to lives and property within the CZU. The plan identifies communities at risk within San Mateo County and Santa Cruz Counties, as well as identifying firefighting capabilities and preparedness within CZU. This plan is developed and maintained with input from Federal, State, City, and County agencies, as well as other interested parties, within the San Mateo-Santa Cruz Unit. It is intended for use as a planning and assessment tool only.

Santa Cruz County and San Mateo County Community Wildfire Protection Plan (CWPP)

The Santa Cruz County and San Mateo County Community Wildfire Protection Plan (CWPP) provides a science-based assessment of wildfire hazards and threats to homes in the wildland urban interface (WUI) of both Santa Cruz County, California and San Mateo County, California. The CWPP was published in 2010 and updated in 2018. It was developed through a collaborative process involving CAL FIRE, the Resource Conservation District of Santa Cruz County, San Mateo Resource Conservation District, and the US Fish and Wildlife Service. The purpose of the CWPP is to provide fire agencies, land managers, and other stakeholders in the counties with guidance and strategies to reduce fire hazard and the risk of catastrophic wildfires in the WUI, while promoting the protection and enhancement of economic assets and ecological resources.

San Mateo County Multijurisdictional Local Hazard Mitigation Plan (MLHMP)

The 2021 San Mateo County Multi-Jurisdiction Local Hazard Mitigation Plan defines measures to reduce risks from natural disasters in the San Mateo County Operational Area, which consists of the entire county, including unincorporated areas, incorporated cities, and special purpose districts. The plan complies with federal and state hazard mitigation planning requirements to establish eligibility for funding under Federal Emergency Management Agency (FEMA) grant programs for all planning partners.

San Mateo County Emergency Operations Plan (SMCEOP)

The County's 2015 Emergency Operations Plan is a guidebook for the San Mateo County Operational Area (OA) to utilize during phases of an all-hazards emergency management process

which include preparedness, response, recovery, and mitigation. The EOP is intended to facilitate coordination between agencies and jurisdictions within San Mateo County while ensuring the protection of life, property, and the environment during disasters. In accordance with California's Standardized Emergency Management System (SEMS), this Plan provides the framework for a coordinated effort between partners and provides stability and coordination during a disaster.

Wildfire Fuel Management Program 2021-2026

The San Mateo County Parks Forest Health and Community Safety Initiative seeks to improve forest health primarily in parks in the WUI. In 2021 it released a Wildfire Fuel Management Program. The initiative identifies 32 projects totaling 1,830 acres to be completed over five years at an estimated cost of \$18,750,000. By evaluating and prioritizing critical projects to mitigate threats to life and property for multiple years, the department will be more effective in allocating staff and financial resources to the full scope of the work, including planning, permitting, treatment, and retreatment of areas.

FIRE SAFE San Mateo County

The mission of FIRE SAFE San Mateo County is to achieve effective fire protection, education, and planning for those living in the WUI through the guidance of local agencies and public/private partnerships. Members include San Mateo County Fire Departments, land management agencies like Midpeninsula Regional Open Space District, San Mateo County Parks and Highlands Recreation District, private landowners like Stanford University/Jasper Ridge Biological Reserve, various cities and towns, homeowners associations, and private entities with an interest in preventing wildfires and reducing their impact on communities.

Midpeninsula Regional Open Space District (Midpen) 2021 Wildland Fire Resiliency Plan

Midpen has preserved a regional greenbelt system of nearly 65,000 acres of public land and manages 26 open space preserves (OSPs) from Pacifica to the Santa Cruz County line. Its 2021 Wildland Fire Resiliency Plan outlines programs to increase environmentally sensitive vegetation management in the District through a Vegetation Management Plan, Prescribed Fire Plan, Monitoring Plan, and Wildland Fire Pre-Plan.

Local

Town of Woodside General Plan 2012 (General Plan)

The Town of Woodside General Plan 2012 (General Plan) includes the following goals and policies associated with wildfire:

Goal NH1: Minimize risks posed by hazards.

Policy NH1.1: Land use and development. The Town shall regulate land use and development to avoid or mitigate the effects of natural hazards in order to protect lives and property.

Policy NH1.2: Seismic hazards. The Town shall seek to minimize the risk associated with seismic hazards by requiring adequate geotechnical and geologic reports, developing acceptable minimum engineering standards, and requiring that structures be sited appropriately.

Policy NH1.3: Landslide hazards. The Town shall seek to minimize risk associated with landslide hazards by requiring adequate geotechnical and geologic reports, requiring that structures be appropriately sited, and requiring special design and construction techniques.

Policy NH1.6: Flood Hazards. The Town shall seek to minimize the risk associated with flood hazards by requiring that structures be sited appropriately, prohibiting structures which impede flood waters, requiring flood control measures, requiring maintenance of appropriate vegetation, and prohibiting the placement and accumulation of debris that impedes flood waters.

Policy NH1.9: Fire Hazards. The Town shall seek to minimize the risk associated with fire hazards by requiring adequate defensible space, fire resistant materials, adequate fire protection, and the appropriate siting of structures.

Policy NH1.10: Natural hazard data. The Town shall compile and maintain natural hazard data for the various parts of the Planning Area to be used for risk avoidance in new construction, for risk abatement in existing development, and to protect lives and property.

Policy NH1.11: Education related to natural hazards. The Town shall institute, or participate in, community education programs and information which aid the community in minimizing the risks associated with natural hazards.

Town of Woodside Municipal Code (Town Code)

Section 53.01 of the Town Code requires the underground installation of utilities. The responsibility of the property owner or the person in possession of any property to which an underground utility service for supplying electric, communication, or similar or associated service is made available shall include and be limited to the installation and completion of the underground construction and conduits, conductors, and associated equipment necessary to maintain utility service to the building or structure being served.

The California Building Code (Chapter 150.01 of the Town Code) adopts the California Building Code and contains all fire safety standards that development must adhere to in the town. In October 2022, this code section of Woodside's Municipal code was modified to further mitigate the effects of a potential wildfire.¹⁶ The chapter exceeds State requirements as well, including further specifying materials and construction methods for exterior wildfire exposure, roofing requirements, and requirements for automatic fire-extinguisher systems.

¹⁶ Town of Woodside. Municipal Code. December 2022. Ordinance No. 2022-629. Available: https://library.municode.com/ca/woodside/codes/municipal_code. Accessed: April 28, 2023.

In addition, Section 152.122 regulates fire protection water supply for subdivision developments. The minimum acceptable fire flow and fire hydrant locations/type shall comply with all current Fire District standards required for fire protection. The water supply system layout, design, and construction shall be approved by the Fire Chief and Town Engineer.

Section 152.118 requires all subdivision developments place all utilities underground.

Sections 152.071 and 152.165 require tentative maps that show the location and size of existing and proposed fire hydrants and water lines for all proposed subdivisions and SB9 lot split developments.

Section 153.410 of the Town Code, Hill Development Regulations, contains hillside lot regulations and standards which serve to provide a safe means of ingress and egress and reduce the potential for hillside erosion. Specifically, the regulations determine the maximum number of lots and lot size permitted for development pursuant to the Town's slope-density requirements. In addition, this section describes that geotechnical reports are also required for any grading. Section 153.911 of the Town Code describes evaluation criteria for design review of proposed developments, including that landscape design be evaluated for whether it includes fire resistant plantings and the development of a defensible space around structures by elimination of overgrown plant materials with high fuel content while preserving the natural environment.

Town of Woodside 2017 Emergency Operations Plan (EOP)

The 2017 Emergency Operations Plan (EOP) establishes policies and procedures and assigns responsibilities to ensure the effective management of emergency operations within the Town of Woodside during an extraordinary emergency or disaster. It provides a framework for understanding the emergency management structure including how and when the Emergency Operations Center is activated. The EOP ranks a major wildland fire as a level three full activation of the Emergency Operations Center.

Town of Woodside Evacuation Plan

The purpose of the Evacuation plan is to provide for the orderly and coordinated evacuation of all or a part of the population of Woodside. It identifies 25 evacuation routes throughout the Town, all listed in Appendix 4 of the Plan.

Town of Woodside 2015 Climate Action Plan (CAP)

The 2015 Climate Action Plan (CAP) identifies extreme heat events as an impact of climate change on the Town of Woodside and reducing the risk of wildfires through fuels reduction in the urban-wild land interface as an adaptation measure. It also calls for the coordination of efforts between the Woodside Fire Protection District, Town, private residents, the County, and Midpen to reduce the risk of wildfires through fuels reduction in the wildland urban interface.

Town of Woodside 2012 Residential Design Guidelines

The 2012 Residential Design Guidelines suggest ways of locating and designing homes that achieve the goals of the General Plan. It outlines how to site plan to consider the relationship between

buildings and high fuel load vegetation and other ways to adhere to fire safety regulations while maintaining the rural character of Woodside.

Impact Analysis

SIGNIFICANCE CRITERIA

For the purposes of this EIR, a significant impact would occur if the Proposed Project would:

- Criterion 1:** Substantially impair an adopted emergency response plan or emergency evacuation plan;
- Criterion 2:** Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire;
- Criterion 3:** Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; or
- Criterion 4:** 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.

ASSUMPTIONS AND METHODOLOGY

Impacts related to wildfire hazards and risks were evaluated using a review of Fire Hazard Severity Zone (FHSZ) mapping for the Planning Area and research prepared in compliance with federal, State, and local laws, regulations, and professional standards pertaining to wildfire. CEQA does not generally require an agency to consider the effects of existing environmental conditions on a project's future users or residents (a project's effects on the environment as opposed to the environment's effects on the project). Consequently, impacts under the thresholds identified below would only be considered significant if the Proposed Project risks exacerbated existing environmental conditions.

IMPACTS

- Impact 3.10-1** Implementation of the Proposed Project would not substantially impair an adopted emergency response plan or emergency evacuation plan. (*Less than Significant*)

A significant impact would occur if implementation of the Proposed Plan would substantially impair implementation of the San Mateo County Multijurisdictional Local Hazard Mitigation Plan (MLHMP), the San Mateo County Emergency Operations Plan (SMCEOP), the Santa Cruz County

and San Mateo County Community Wildfire Protection Plan (CWPP), the Town of Woodside Emergency Operation Plan (EOP), or the Town of Woodside Evacuation Plan which guide emergency evacuation and response operations within the Planning Area.

The County of San Mateo 2021 Multijurisdictional Local Hazard Mitigation Plan (MLHMP) details emergency response and evacuation preparations to minimize risks of fire danger.¹⁷ Suggested mitigation strategies include identifying fire response and alternative evacuation routes and establishing where they are needed, providing this information in Spanish by trusted community organizations, promoting the Firewise USA program, sending multilingual messages via alert systems, developing more paths to becoming a volunteer firefighter or to having a career in firefighting, and providing home repair services for seniors or disabled community members not capable of creating defensible spaces around their homes alone. The Town of Woodside jurisdictional annex to the MLHMP includes specific actions that the Town will implement to facilitate emergency evacuation and response, including in the event of wildfire. Action WDS-6 involves providing additional ingress/egress routes where feasible for neighborhoods that only have one ingress/egress route available. Action WDS-15 calls for supporting countywide actions and active participation in the plan maintenance strategy and protocols of the MLHMP.

The San Mateo County Emergency Operations Plan (SMCEOP) describes the Operational Area's emergency organization; roles, responsibilities, and authorities; response and recovery; effective mobilization of all the resources of the County, both public and private, to meet any condition constituting a local emergency, including a wildfire. Similarly, the Town of Woodside EOP establishes policies and procedures and assigns responsibilities to ensure the effective management of emergency operations within the Town of Woodside during an extraordinary emergency or disaster. The Santa Cruz County and San Mateo County Community Wildfire Protection Plan (CWPP) by CAL FIRE outlines existing evacuation procedures and provides associated recommendations, such as reducing fuel in the roadside right of way and implementing strategic fuel breaks in order to support safer ingress/egress for emergency responders and the general public.

The Town of Woodside Evacuation Plan prepared by the Woodside Fire Protection District outlines the steps required to provide for the orderly and coordinated evacuation of all or a part of the population of Woodside. The Evacuation Plan also provides pre-incident planning considerations for transportation, shelters, traffic control, warnings, special facilities and special needs populations, and animal evacuation. It identifies 25 evacuation routes throughout the Town, all listed in Appendix 4 of the Plan. Neighborhood streets identified as evacuation routes in Appendix 4 of the Evacuation Plan feed into either Woodside Road, Portola Road, Cañada Road, or Skyline Boulevard.¹⁸

Development pursuant to the Proposed Project would be consistent with and comply with the measures and actions in the MLHMP, EOPs, CWPP, and the Town of Woodside Evacuation Plan

¹⁷ San Mateo County. Multijurisdictional LHMP. 2021. Available:

<https://www.smcgov.org/media/53471/download?inline=>. Accessed: April 28, 2023.

¹⁸Town of Woodside. Evacuation Plan. Available:

<https://www.woodsidefire.org/attachments/article/50/Town%20of%20Woodside%20Evacuation%20Plan.pdf>.

Accessed: April 28, 2023.

by only proposing development within the Town limits, including smaller scale infill development in established residential neighborhoods. These existing neighborhoods are already served by evacuation routes which are maintained pursuant to Policy NH2.1 of the General Plan. Further, in VHFHSZs, all new developments must comply with fire protection standards which are largely consistent with the measures and actions of adopted emergency evacuation plans. New buildings proposed in any LRA Very-High Fire Hazard Severity Zone are required to comply with California Building Code regulations that stipulate construction methods, including vegetation management practices. By properly managing hazardous vegetation, subsequent reduction in fuels along roadways would be consistent with recommendations of the CWPP.

Development pursuant to the Proposed Project, including multi-family development at Cañada College, 773 Cañada Road, Raymundo Drive, and High Road, would be required to comply with the regulations in the California Fire Code, which has been adopted by the Woodside Fire Protection District and ratified by the Town. The Fire Code includes safety measures and regulations for site access clearance and hydrants. Specifically, Fire Code Chapter 10 addresses fire-related means of egress, including fire apparatus access road width requirements, while Fire Code Appendix CC addresses fire hydrant locations and distribution. Specifically, the path of egress travel along a means of egress shall not be interrupted by a building element other than a means of egress component. Fire hydrants shall also be provided along required fire apparatus access roads and adjacent public streets. In addition, according to Appendix D, where a fire hydrant is located on a fire apparatus access road, the minimum road width shall be 26 feet. As such, compliance with such regulations would not impair an adopted emergency response or evacuation plan.

In addition to adopted emergency evacuation plans, the Woodside 2012 General Plan Natural Hazards and Safety Element Policy NH2.1 establishes Interstate 280, Woodside Road, and arterial roads (shown in the Circulation Element of the General Plan) as evacuation routes for use in the event of emergency. The policy requires that the routes always be maintained in usable conditions, not impeded by structures, low overhead signs, or trees that would block the passage of vehicles. Further, the Proposed Plan has programs aimed at minimizing damage from natural disasters.¹⁹ Program H5-1b states that the Town should prioritize improving emergency access and response in the very high severity fire hazards zones and program H5-1c states the Town should facilitate and encourage neighborhood preparedness. These programs align with the goals and policies of existing emergency evacuation and response plans for Woodside and the region.

In total, development associated with the Proposed Project would house additional residents in the Planning Area, making it necessary to evacuate more people in the event of a wildfire that affects the Town. However, there are numerous robust strategies in place from regional to local planning efforts focused on facilitating emergency responses and evacuations. Therefore, housing development associated with the Proposed Plan would not impede the implementation of emergency response and evacuation plans; impacts would be less than significant.

¹⁹ Town of Woodside. Housing Element Draft. 2023. Available: https://www.woodsidesidtown.org/sites/default/files/fileattachments/planning/page/33983/woodside_housing_element_draft_2_-_3-7-23.pdf. Accessed: April 28, 2023.

Mitigation Measures

None required.

Impact 3.10-2 Implementation of the Proposed Project would not exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. (Less than Significant)

As shown in Figure 3.10-2, a significant portion of the western part of Woodside is located in a Very High Fire Hazard Severity Zone as mapped by CAL FIRE. There is existing development within the High Fire Hazard Severity Zone, consisting of low-density single family homes, commercial uses, Cañada College, and facilities associated with Teague Open Space Preserve, Wunderlich County Park, and Thornewood Open Space Preserve. In addition, several sites proposed for development do fall into or are adjacent to High and Very High Fire Hazard Severity Zones within the Town limit. As such, buildout of the Proposed Plan could increase the risk of loss and damage due to wildfire, resulting in potentially significant impacts.

However, all new construction under the Proposed Plan would be subject to applicable State regulations, including the California Fire Code, which has been adopted by the Woodside Fire Protection District and ratified by the Town. The Fire Code includes safety measures to minimize the threat of fire, such as ignition-resistant construction with exterior walls of noncombustible or ignition resistant material from the surface of the ground to the roof system and sealing any gaps around doors, windows, eaves, and vents to prevent intrusion by flame or embers. Construction would also be required to meet CBC requirements, including CCR Title 24, Part 2, which includes specific requirements related to exterior wildfire exposure. The Board of Forestry, via CCR Title 14, sets forth the minimum development standards for emergency access, fuel modification, setback, signage, and water supply, which help prevent loss of structures or life by reducing wildfire hazards. The codes and regulations would reduce the risk of loss, injury, or death from wildfire for new developments under the Proposed Plan.

Local codes also serve to reduce wildfire risk. Chapter 150.01 of the Town Code includes fire safety standards that all new development must adhere to in the town. The chapter exceeds State requirements; Section 150.01 (E) outlines materials and construction methods for exterior wildfire exposure regarding roofing and division, venting, exterior covering, exterior windows and doors, and decking. Roofing requirements are further specified in Section 150.01 (F) and state that the roof covering or roof assembly for all structures shall be Class A fire retardant. Section 150.01 (G) requires that automatic fire sprinkler systems shall be installed and maintained in every new building or structure of any type, use, occupancy, or size which requires a building permit issued by the Town of Woodside. Compliance with these requirements would help to minimize and mitigate potential for loss from wildfire exposure.

Further, developments pursuant to the Proposed Plan without existing utility connections would be required to install new water mains within the street network to serve fire and domestic water needs. In addition, Woodside Town Code Sections 152.071 and 152.165 require tentative maps that show the location and size of existing and proposed water lines for all proposed subdivisions and SB9 lot split developments. Section 152.122 requires that subdivisions maintain the minimum

acceptable fire flow and fire hydrant locations/type that comply with all current Fire District standards required for fire protection. See also Section 3.9: Utilities and Service Systems for more information regarding water supply and infrastructure improvements. Compliance with these requirements will ensure that adequate water capacity and pressure is maintained for firefighting. Adherence to these codes and regulations would reduce the risk of loss, injury, or death from wildfire for new developments facilitated by the Proposed Project.

Overall, compliance with existing State and local codes, plans, and regulations would reduce impacts to the maximum extent practicable and, therefore, impacts related to exacerbated wildfire risks, increased exposure to pollutant concentrations from a wildfire, and uncontrolled spread of wildfire resulting from implementation of the Proposed Project would be less than significant.

Mitigation Measures

None required.

Impact 3.10-3 Implementation of the Proposed Project would not require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. (Less than Significant)

Future development facilitated by the Proposed Project may require the installation of water, sewer, stormwater, and electrical utilities. As such, installation of associated infrastructure, such as new electrical power lines, could result in a potentially significant exacerbation of wildfire risk. Further, several sites proposed for development do fall into or are adjacent to High and Very High Fire Hazard Severity Zones within the Town limit, particularly near Teague Hill Open Space Preserve, Wunderlich Park, and Sky Londa Neighborhood. However, as described under Impact 3.15-2 above, compliance with existing State and local codes and regulations, including Title 14 of the California Code of Regulations and the California Fire and Building Codes, would help mitigate these wildfire risks from new construction and associated infrastructure.

All proposed installation and improvements would be subject to Town development standards and verified as part of either a building permit or construction approval process in order to reduce any associated risk. During the Town's standard development review process, which includes the Fire District and Building Division, the Town evaluates developments in high fire-risk areas to ensure that improvements meet their requirements. This coordination is independent of the CEQA process; it would be unaffected by the Project. In addition, during the design review process for proposed development as outlined in Section 153.911 of the Town Code, landscape design will be evaluated by whether it includes fire resistant plantings and the development of a defensible space around structures by elimination of overgrown plant materials with high fuel content while preserving the natural environment. Such structures may include utilities and other associated infrastructure.

In addition, Section 53.37 of the Town Code requires the underground installation of utilities. As stated in the section, all electrical and communication service wires or cables to any new building or structure, and all electrical and communication service wires to any old building or structure not already served by aboveground overhead wires or cables shall be placed underground. As noted in Section 53.01, it is the responsibility of the property owner to install and complete the underground construction and conduits, conductors, and associated equipment necessary to maintain utility service to the building. Further, Section 152.118 requires all SB 9 lot split developments place utilities underground. Section 152.118 also specifies that utilities shall be coordinated to permit the joint use of trenches and easements so as to reduce the disturbance of the natural surroundings. Reducing changes to natural surroundings during the development process would serve to limit any associated exacerbation of wildfire risk from infrastructure.

Erosion control best practices would also be required for the installation of associated infrastructure, which in turn would prevent post-fire slope instability. When required by the Phase II Stormwater Permit or by the Town, a project shall have an Erosion and Sediment Control Plan (ESCP) which addresses erosion and sediment control and pollution prevention during the construction phase as well as final stabilization control measures. In addition, the general provisions of Chapter 153, Zoning, of the Town Code implement controls to minimize runoff, soil erosion, and stream and drainage channel siltation. Where the natural runoff of stormwaters is changed by grading, structures, buildings, driveways, or paved areas, the landowner shall prevent the unnatural diversion of surface waters to downslope lots.

Because future development within the Town including installation or maintenance of associated infrastructure, would be required to comply with local regulations, including the Town's development review process, implementation of General Plan policies, and compliance with the Town Code, impacts related to fire risk due to the installation or maintenance of associated infrastructure would be less than significant.

Mitigation Measures

None required.

Impact 3.10-4 Implementation of 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. (Less than Significant)

Within Woodside, landslide risk occurs mainly in the steep hills at the northern and eastern edges of the Planning Area boundary. The risk of landslides in the hilly terrain could be exacerbated if existing vegetation is substantially removed during a wildfire event. Implementation of the Proposed Project would permit development in and downslope from landslide susceptibility areas, and as such, could expose people and structures to risk in the event of flooding or landslides following a wildfire event. However, as described in Section 3.4 (Geology and Soils) of this Draft EIR, development in areas of steeper terrain under the Proposed Plan would be required to comply with the provisions of the Town Code as well as with NPDES stormwater requirements for erosion

control. Chapter 153.410 of the Town Code contains hillside lot regulations and standards which serve to provide a safe means of ingress and egress and reduce the potential for hillside erosion. Specifically, the regulations determine the maximum number of lots and lot size permitted for development pursuant to the Town's slope-density requirements. Geotechnical reports are also required for any grading under Chapter 153.410 of the Town Code which require the report to meet the guidelines of the General Plan seismic safety, natural hazards, and safety element and provisions of the Zoning Code relating to geologically hazardous areas.

Further, Section 153.911 of the Town Code requires landscape design to be evaluated by whether it includes fire resistant plantings and defensible space around structures by elimination of overgrown plant materials with high fuel content while preserving the natural environment. Such landscaping will create and maintain a continuous reduced-fuel zone while maintaining the health of the natural landscape which will not only reduce wildfire intensity and rate of spread, but also limit the potential for subsequent slope instability in the steep foothills. The creation of additional impermeable surfaces in association with the Proposed Project could exacerbate an existing flooding issue. However, NPDES requirements for erosion control would prevent unnatural diversion of surface waters to downslope lots. When required by the Phase II Stormwater Permit or by the Town, a project shall have an Erosion and Sediment Control Plan (ESCP) which addresses erosion and sediment control and pollution prevention during the construction phase as well as final stabilization control measures. Erosion control plans shall meet the NPDES permit requirements for San Mateo County. In addition, the general provisions of Chapter 153, Zoning, of the Town Code implement controls to minimize runoff, soil erosion, and stream and drainage channel siltation. Where the natural runoff of stormwaters is changed by grading, structures, buildings, driveways, or paved areas, the landowner shall prevent the unnatural diversion of surface waters to downslope lots. The building limitations set forth in the Zoning Code also specify the minimum net area of a lot to accommodate topography, geologic hazards, stormwater drainage channels, physical obstructions, or other physical conditions.

Therefore, the risk of loss or damage in downstream areas due to landslides and downstream flooding would be reduced to the maximum extent practicable with compliance with existing regulations related to hillside construction, stormwater management, and flood and erosion control. Accordingly, impacts related to post-fire hazards would be less than significant.

Mitigation Measures

None required.

3.11 Effects Found Not to be Significant

This chapter is based on input for the Woodside General Plan Housing Element Update Environmental Impact Report (EIR) Notice of Preparation (NOP) and Initial Study dated May 23, 2023 and contained in Appendix A of this Draft EIR. The NOP and Initial Study was circulated for public review between May 23, 2023 and June 22, 2023. The NOP and Initial Study identified certain impacts for which there is no likelihood of a significant impact due to the location and characteristics of the Planning Area. This chapter provides a brief description of these effects found not to be significant, based, in part, on the NOP evaluation, NOP comments, and/or more detailed analysis conducted as part of the EIR preparation process.

Agricultural and Forestry Resources

A significant impact would occur if implementation of the Proposed Project would result in one or more of the following:

- Criterion 1:** Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use;
- Criterion 2:** Conflict with existing zoning for agricultural use, or a Williamson Act contract;
- Criterion 3:** 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));
- Criterion 4:** Result in the loss of forest land or conversion of forest land to non-forest use;
or
- Criterion 5:** Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.

Under the FMMP, the Town of Woodside is categorized as “Urban and Build-Up Land” and “Other Land”.¹ There is no Farmland within the town limit. Therefore, the Project would have no impact on Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The Williamson Act, codified in 1965 as the California Land Conservation Act, allows local governments to enter into contracts with private landowners with the intent of restricting the use of land to agricultural or related open space through tax incentives. These incentives tax farmers based on an open space designation, which is a much lower rate than the full market value tax. Through this contract, farmers agree to freeze development of their land for 10 years. The current San Mateo County Williamson Act Parcel Map does not list any Williamson Contract parcels located within the Town of Woodside.² Additionally, there are no districts on the Woodside Zoning Map zoned for agricultural uses in the town. Therefore, no impacts related to conflicts with agricultural zoning or Williamson Act contracts would occur.

In the Public Resources Code (PRC) section 4526, the California Board of Forestry and Fire Protection defines “Timberland” as land, not owned by the federal government, nor designated as experiential forest land, which is capable and available for growing any commercial tree species. The board defines commercial trees on a district basis following consultation with district committees and other necessary parties. There is no land within the Town of Woodside zoned for timberland production or that otherwise meets this definition. The PRC section 12220 (g) defines forest land as “. . . land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.” While wooded hillsides in Woodside may support more than 10 percent native tree coverage, these lands are interspersed with development and are not managed for forest resources or used for commercial timber production. These areas are relevant to the Planning Area’s biological resources and are evaluated in terms of special-status species, sensitive habitats, and related regulations and plans in Section 3.3: Biological Resources. Development pursuant to the Proposed Project would take place on parcels currently zoned for residential uses and as such no conflicts, loss of forest land, or conversion of forest land to non-forest use would result from Project implementation. Therefore, the Proposed Project would have no impact on forest resources.

Cultural Resources

A significant impact would occur if implementation of the Proposed Project would result in one or more of the following:

Criterion 1: Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5;

¹ California Department of Conservation. 2022. California Important Farmland Finder. Available: <https://maps.conservation.ca.gov/DLRP/CIFF/>. Accessed: July 23, 2023.

² San Mateo County. 2017. Williamson Act Parcels. Available: <https://data-smcmaps.opendata.arcgis.com/datasets/smcmaps::williamson-act-parcels/explore>. Accessed: July 23, 2023.

Criterion 2: Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5; or

Criterion 3: Disturb any human remains, including those interred outside of formal cemeteries.

A significant impact would occur if development of the Proposed Project would cause a substantial adverse change in the significance of a historical resource. According to the NWIC results, the State Office of Historic Preservation Built Environment Resources Directory (OHPBERD) lists thirty-four (34) recorded buildings or structures within or adjacent to the Town of Woodside. In addition to these inventories, the NWIC base maps show thirty-seven (37) recorded buildings or structures within the town limits. None of the sites on the Housing Element inventory contains historic buildings or structures as identified by NWIC. As such, development under the Proposed Project would not cause significant adverse changes of historic resources, and no impact would occur.

In addition, there are several homes, buildings, and structures older than 50 years in the Planning Area that may be eligible for listing on local, state, or national registers. The Historic Preservation Element also lists Goal HP1 to protect historically and archaeologically significant structures, sites, and artifacts with specific strategies. The Town of Woodside Residential Design Guidelines introduces regulations that can reduce impacts on potential historic resources. Such guidelines require development to preserve buildings and structures that contribute to community fabric. Preservation or adaptive reuse of existing or historic structures is preferred over demolition. Development under the Proposed Project would need to adhere to the General Plan and Town Residential Design Guidelines, with respect to historic and archaeological resources. As such, with compliance with existing regulations, implementation of the Proposed Project would result in a less than significant impact to historic and archeological resources.

Buildout of the proposed project includes construction of small-scale residential projects as well as higher density housing at 773 Cañada Road, Raymundo Drive at Runnymede Road, High Road at Woodside Road, and Cañada College, not in areas known to contain human remains. However, there is always the possibility that subsurface construction activities associated with the Proposed Project, such as trenching and grading, could potentially damage or destroy previously undiscovered human remains. In the event of the accidental discovery or recognition of any human remains, CEQA Guidelines Section 15064.5, Health and Safety Code Section 7050.5, and Public Resources Code Section 5097.94 and Section 5097.98 must be followed. Thus, with compliance of existing regulations, implementation of the Proposed Project would result in a less than significant impact to disturbance of human remains.

Energy

A significant impact would occur if implementation of the Proposed Project would result in one or more of the following:

Criterion 1: Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation;

Criterion 2: Conflict with or obstruct a state or local plan for renewable energy or energy efficiency;

Buildout of the Proposed Project would involve construction of small-scale residential projects, as well as higher density housing at 773 Cañada Road, Raymundo Drive at Runnymede Road, High Road at Woodside Road, and Cañada College. A significant impact would occur if development under the Proposed Project would result in potentially significant environmental impacts due to wasteful, inefficient or unnecessary consumption of energy resources during project construction and operation. The construction and long-term operation of residential development is needed to meet projected demand in the Town of Woodside, which is thereby necessary and not wasteful. Future development would be required to comply with the California Green Building Standards Code and California's Title 24 Building Energy Efficiency Standards. This includes the update to Title 24, effective January 1, 2023, which requires that all new homes under three stories install solar panels. Title 24 also applies to ADUs and requires them to include a solar energy system that can generate enough to offset the dwelling's annual electrical usage. The Town also verifies compliance with the California Building Code (CBC) as part of the building permit issuance and construction inspection process. The Town's General Plan also adopted a number of sustainability building and energy efficiency goals and policies in the Sustainability Element that development under the Proposed Project would be subject to as well, such as encouraging and supporting renewable clean energy and requiring new buildings to be designed energy efficiently. Additionally, the Town's Draft Housing Element also lists a policy and programs aligned with energy conservation, which includes Policy H6.3 – Promote Sustainability Including Energy Efficient and Sustainability. This policy specifies the Town's continued compliance with Title 24 and inclusion of energy saving siting, features, and materials in the retrofit of existing and new units. Given the level of buildout and compliance with existing regulations, the Proposed Project would result in a less than significant impact to energy resources.

Hazards and Hazardous Materials

A significant impact would occur if implementation of the Proposed Project would result in one or more of the following:

Criterion 1: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;

Criterion 2: Create a significant hazard to the public or the environment through reasonably foreseeable conditions involving the release of hazardous materials into the environment;

- Criterion 3: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;**
- Criterion 4: Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment;**
- Criterion 5: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area;**
- Criterion 6: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan;**
- Criterion 7: Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires;**

Implementation of the Proposed Project would involve facilitation of housing construction and would not involve the transport, use, or disposal of significant quantities of hazardous materials. Demolition or development under the Proposed Project may involve the handling and transport of hazardous materials that could result in the need to handle and transport asbestos or lead based paints; however, such activities are subject to various federal, State, and local regulations, including BAAQMD regulations pertaining to asbestos abatement; Construction Safety Orders 1529 (pertaining to asbestos) and 1532.1 (pertaining to lead) from Title 8 of the California Code of Regulations; Part 61, Subpart M of the Code of Federal Regulations (pertaining to asbestos); and lead exposure guidelines provided by the United States Department of Housing and Urban Development. Asbestos and lead abatement must be performed and monitored by contractors with appropriate certifications from the state Department of Health Services.

Construction activities may involve the use of diesel-powered equipment or the application of architectural coatings, but not at levels that could create a significant hazard to the public or environment. Similarly, once constructed, the residents of new homes constructed pursuant to the Proposed Project may use cleaning solvents or landscaping chemicals, but not at levels that could create a significant hazard to the public or environment. Overall, any transport, use, storage, and disposal of hazardous materials would be required to comply with existing regulations established by several agencies, including the Department of Toxic Substances Control, the US Environmental Protection Agency (EPA), the US Department of Transportation, and the Occupational Safety and Health Administration.

The construction and operation of housing generally does not involve the release – accidental or otherwise – of hazardous materials that would create a significant hazard to the public, nor would it involve emitting or handling acutely hazardous materials or wastes in the vicinity of schools.

Overall, compliance with existing regulations would result in a less than significant impact. A significant impact would occur if development under the Proposed Project is 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, it would create a significant hazard to the public or the environment. The California Department of Toxic Substances Control (DTSC)'s EnviroStor database which, pursuant to Government Code Section 65962.5, lists Federal Superfund, State Response, Voluntary Cleanup, School Cleanup, Hazardous Waste Permit, and Hazardous Waste Corrective Action site, and the State Water Resources Control Board's GeoTracker database, which tracks authorized or unauthorized discharges of waste to land, or unauthorized releases of hazardous substances from underground storage tanks. According to the DTSC's database on December 22, 2022, there are no hazardous materials sites located in the Town of Woodside. Therefore, there would be no impact.

There are no public airports within two miles of the town limits. The nearest airport is the San Carlos Airport located approximately five miles north of the town. The Proposed Project generally involves small-scale residential development on previously developed parcels within the Town limit. Therefore, implementation of the Proposed Project would result in no impact related to airport hazards.

The risk of natural hazards, including wildfire, earthquake, and landslides, is present in Woodside, where evacuation is necessary if a natural disaster were to happen. The Town of Woodside has adopted an Emergency Operations Plan and the County of San Mateo has adopted a Local Hazard Mitigation Plan with strategies to address emergency evacuation scenarios. The Woodside Fire Protection District has also prepared an Evacuation Plan for the Town of Woodside, which provides coordinated evacuation routes and evacuation areas in case of an emergency situation. The Town of Woodside Evacuation Plan lists 25 evacuation routes for various neighborhoods in Woodside, depending on location within the Town. All evacuation routes are displayed and listed in Appendix 4 of the Evacuation Plan. The Natural Hazards and Safety Element of the General Plan also outlines numerous policies regarding emergency preparedness, including the preservation of critical facilities like Evacuation Routes, development of emergency preparedness plans, and support of emergency preparedness education Townwide. The Town has an Emergency Preparedness Committee that supports the General Plan policies to institute or participate in education related to natural hazards and to support emergency preparedness education. The Emergency Preparedness Committee works with Town staff to develop and maintain appropriate plans and procedures for responding to disasters, including wildfires, earthquakes, floods, and other emergencies. The Emergency Preparedness Committee supports the work of the WPV-Ready and WPV-CERT to develop a network of volunteers to respond to emergencies at the neighborhood level. The Proposed Project could result in the development of 423 new housing units over eight years. Given the current evacuation plans and policies in place at the Town of Woodside, impacts related to the impairment or interference of an adopted emergency response plan or emergency evacuation plan are less than significant.

Criterion 7 is addressed and analyzed in the Wildfire chapter of the EIR.

Hydrology and Water Quality

A significant impact would occur if implementation of the Proposed Project would result in one or more of the following:

- Criterion 1:** Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality;
- Criterion 2:** Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin;
- Criterion 3:** Substantially alter the existing drainage pattern of the site or area including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would;
- i. Result in substantial erosion or siltation on- or off-site;
 - ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;
 - iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or
 - iv. Impede or redirect flood flows;
- Criterion 4:** In flood hazard, tsunami, or seiche zones, risk increase of pollutants due to project inundation;
- Criterion 5:** Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan;

A significant impact would occur if the Proposed Project would violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. Buildout of the Proposed Project would involve construction of small-scale residential projects, as well as higher density housing at 773 Cañada Road, Raymundo Drive at Runnymede Road, High Road at Woodside Road, and Cañada College. Development would be required to adhere to all applicable federal, State, and local regulations. Construction activities must comply with the NPDES Construction General Permit which requires standard erosion control measures and BMPs

identified in a Stormwater Pollution Prevention Plan (SWPPP) and implemented during construction to reduce sedimentation in waterways and any loss of topsoil.

Development associated with the Proposed Project would also be required to comply with Town of Woodside Storm Water Management and Discharge Control Ordinance (Chapter 52 of the Municipal Code) requirements and prepare a stormwater control plan, which would require construction-site control and erosion control BMPs to reduce impacts related to stormwater runoff. Conformance with federal, State, and local regulations would ensure that future projects would not result in increased rates or amounts of surface runoff, exceed the capacity of existing or planned stormwater drainage systems, or impede or redirect flood flows. Therefore, implementation of the Proposed Project would result in less than significant impacts related to water quality and waste discharge.

A significant impact would occur if the Proposed Project would substantially decrease groundwater supplies, interfere with groundwater recharge, or alter the existing drainage pattern of the site. Buildout of the Proposed Project would involve construction of small-scale residential projects, as well as higher density housing at 773 Cañada Road, Raymundo Drive at Runnymede Road, High Road at Woodside Road, and Cañada College. The Proposed Project does not propose the modification of drainage patterns nor is it expected to interfere with groundwater recharge. Construction activities occurring due to the implementation of the Proposed Project would be subject to the erosion and sedimentation control provisions of the Municipal Code Section 151.20(A)(8). All development pursuant to the Proposed Project would be subject to the applicable provisions of the Municipal Code regarding low impact development for stormwater management and drainage plans. Additionally, certain projects may be subject to drainage calculations by civil engineer of record, which shall comply with Woodside Municipal Code Section 151.43, to show that post construction run-off does not exceed preconstruction run-off for both scenarios. Compliance with these regulations would ensure that future development under the Proposed Project would not result in substantial increases of impervious surfaces such that groundwater recharge would be hindered, or the existing drainage pattern of the Town would be altered. Therefore, implementation of the Proposed Project would result in less than significant impacts related to groundwater and drainage patterns.

Buildout of the Proposed Project would involve construction of small-scale residential projects, as well as higher density housing at 773 Cañada Road, Raymundo Drive at Runnymede Road, High Road at Woodside Road, and Cañada College, some of which are located within or adjacent to Special Flood Hazard areas, including the 100-year flood plain. Flood hazard areas are located within Residential/Environmentally Sensitive (R-ESA) and Open Space/Environmentally Sensitive (OS-ESA) land use designations. General Plan Policy NH1.6 requires that the Town assess and mitigate flood hazards, outlining six aspects to evaluating this policy. The Town Municipal Code also includes measures to protect against and minimize damage, loss, and death from flooding, requiring permits for development in areas of flood hazard and establishing construction standards for flood hazard reduction.

Development in Special Flood Hazard areas is regulated by the standards in Chapter 55.41 of the Municipal Code, which requires that buildings be protected against flood damage at the time of initial construction; restricts the alteration of natural floodplains, stream channels, and natural

protective barriers, which help accommodate or channel floodwaters; and establishes standards for filling, grading, dredging, and other development activities which may increase flood damage.

Additionally, as noted above, all development pursuant to the Proposed Project would be subject to the applicable provisions of Chapter 52 of the Municipal Code regarding stormwater management and drainage control, which would help ensure no net increase in the rate and volume of peak runoff from the site compared to pre-project conditions. Compliance with these regulations would limit the risk of loss and damage due to flooding to the maximum extent practicable and associated impacts would be less than significant with compliance.

There would be no impact with respect to tsunamis, given that Woodside is located about 10 miles inland from the Pacific Ocean and outside any tsunami hazard zone (DOC, 2019). A seiche is a temporary disturbance or oscillation in the water level of a landlocked body of water (such as a lake) that may be caused by seismic activity. At some locations and times, the resulting oscillations and currents can produce hazardous or even destructive conditions. Schilling Lake is the only significant body of water in Woodside and a potentially damaging seiche could impact developed areas downstream along Dennis Martin Creek. Bear Gulch Reservoir and Searsville Lake are located outside of Woodside and given its location further downstream and its distance from development that may occur with Project implementation, the risk of loss or damage due to seiche is minimal and impacts would be less than significant.

As discussed above, future development under the Proposed Project would be required to adhere to all applicable federal, State, and local regulations with respect to stormwater pollution control, which would reduce the potential for stormwater pollution to the maximum extent practicable. Santa Clara Valley basin and the San Mateo Plain Subbasin underlie the bayside of San Mateo County from approximately the City of San Mateo on the north, to approximately the County boundary at San Francisquito Creek on the south. The California Sustainable Groundwater Management Act (SGMA) requires governments and water agencies of high and medium priority basins to prepare Groundwater Sustainability Plans to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. Since the groundwater basin within San Mateo County have been ranked by the Department of Water Resources (DWR) as a low priority, there is no requirement for the County to prepare a Groundwater Sustainability Plan (SGMA, 2022). For these reasons, future development under the Proposed Project would not substantially degrade water quality or conflict with a sustainable groundwater management plan, and no impact would occur.

Land Use/Planning

A significant impact would occur if implementation of the Proposed Project would result in one or more of the following:

Criterion 1: Physically divide an established community;

Criterion 2: Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect;

The physical division of an established community typically refers to the construction of a linear feature, such as an interstate highway or railroad tracks, or removal of a means of access, such as a local bridge that would impact mobility within an existing community or between a community and outlying area. The Proposed Project does not involve any such features and would not remove any means of access or impact mobility. Implementation of the Proposed Project would facilitate residential development required to meet the Town's RHNA allocation, consisting of construction of small-scale residential projects, as well as higher density housing at 773 Cañada Road, Raymundo Drive at Runnymede Road, High Road at Woodside Road, and Cañada College. As such, the Proposed Project would not physically divide an established community and impacts would be less than significant.

Implementation of the Proposed Project would require amendments to the Town of Woodside Zoning Map and adoption of objective design and development standards for multifamily development. Residential development under the Proposed Project will be required to comply with the General Plan policies regarding land use and Municipal Code requirements associated with zoning districts, allowable uses, and development standards, as amended for Proposed Project implementation. Therefore, implementation of the Proposed Project would have a less than significant impact in regard to conflicts with a land use plan, policy, or regulation adopted to avoid an environmental effect.

Mineral Resources

A significant impact would occur if implementation of the Proposed Project would result in one or more of the following:

Criterion 1: Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state; or

Criterion 2: Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan.

Much of the land in the Planning Area has been previously graded or developed. There are no mineral resources in the Town of Woodside. In addition, no locally important mineral resource recovery sites are delineated in the General Plan or other land use plans. The Proposed Project would not facilitate new development in the vicinity of a mineral resource site, and therefore would not result in the loss of availability of either a known mineral resource deposit or a locally important mineral resource recovery site. As such, the Proposed Project would have no impact on the availability of mineral resources within Woodside.

Population/Housing

A significant impact would occur if implementation of the Proposed Project would result in one or more of the following:

- Criterion 1: Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure);**
- Criterion 2: Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere;**

Buildout of the Proposed Project would involve construction of small-scale residential projects as well as higher density housing at 773 Cañada Road, Raymundo Drive at Runnymede Road, High Road at Woodside Road, and Cañada College. While implementation of the Proposed Project would involve the extension of utility infrastructure to some sites, all new development would occur within the Town limits and the Proposed Project would not involve the extension of roads or infrastructure into undeveloped areas in a way that would induce substantial unplanned growth. Buildout of the Proposed Plan would result in an increase in population and housing units consistent with regional planning projections, and it would occur incrementally over a period of 8 years. Therefore, the Proposed Project would result in a less than significant impact associated with population growth, either directly or indirectly.

The Proposed Project would facilitate the provision of housing to meet the projected need at all income levels in Woodside. The Proposed Project also includes measures to preserve the existing housing stock, especially affordable units, such as by providing legal nonconforming status for unpermitted ADUs. Development under the proposed project would increase housing supply in the community at all income levels and help prevent displacement. Therefore, it would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere, and no impact would occur.

Public Services

A significant impact would occur if implementation of the Proposed Project would result in one or more of the following:

- Criterion 1: Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services;**

- i. Fire protection;**
- ii. Police protection;**
- iii. Schools;**
- iv. Parks;**
- v. Other public facilities;**

Buildout of the Proposed Project would involve construction of up to 423 housing units throughout the town, consisting of construction of small-scale residential projects, as well as higher density housing at 773 Cañada Road, Raymundo Drive at Runnymede Road, High Road at Woodside Road, and Cañada College. The increased local population generated by the Proposed Project would likely result in an increase in calls for fire and emergency medical service compared to existing conditions. However, development would take place incrementally over the 8-year planning period and be concentrated primarily in areas with fire and police access. The current redevelopment of Station 7 would involve the upgrade of eight apparatus bays for storing firefighting and emergency response vehicles, five more than the existing site's three. Station 7 fire services were moved to Interim Fire Station 7 at the Stanford Linear Accelerator Center site on Sand Hill in June, which is fully functional. As such, the Proposed Project would not require the construction of new police and fire facilities over and above those already occurring in Woodside. Impacts would be less than significant.

Implementation of housing programs in the Proposed Project would involve construction of up to 423 housing units throughout the Town. While many of these new housing units would be ADUs and smaller apartments for single persons, and college students, it is reasonably foreseeable that some of these units would support families with children that may attend the surrounding school districts. New students of various ages would be enrolled incrementally over the 8-year planning period. Therefore, in view of the Woodside Elementary's recent enrollment trend and the fact that Woodside is served by three other elementary school districts, the incremental increase in enrollment resulting from the Proposed Project would not necessitate the construction or expansion of new school facilities and this impact would be less than significant. Further, development under the Proposed Project would be also required to comply with SB 50, which mandates statutory school facilities fees for residential developments. Compliance with SB 50 would financially offset impacts on Woodside School District capacity and would provide funding for potential future school facility development needs associated with the Proposed Project related to population increase.

Implementation of housing programs in the Proposed Project would involve construction of up to 423 housing units throughout the town, consisting of small projects, as well as higher density housing at 773 Cañada Road, Raymundo Drive at Runnymede Road, High Road at Woodside Road, and Cañada College. Public parks, including Barkley Fields and Park with active recreation facilities, and open space account for 8,287 acres within the Woodside Planning Area. Additionally,

there is a total of 37,471 acres of open space adjacent to the Planning Area that are held by Midpeninsula Regional Open Space District and San Mateo County Parks. This translates to about 4.3 acres of parkland per housing unit within the Planning Area, and about 23.8 acres of parkland per housing unit within and adjacent to the Planning Area, including the Sphere of Influence. Factoring in the additional construction of the 423 housing units from the Proposed Project, this translates to about 3.5 acres of parkland per housing unit, and about 19.5 acres of parkland per housing unit within and adjacent to the Planning Area, including the Sphere of Influence. This shows there would be a minimal reduction in parkland per housing unit. As there would still be adequate park facilities in Woodside, implementation of the Proposed Project would not trigger the need to construct new parks in order to maintain established service ratios. Impacts would be less than significant.

Other public facilities typically include libraries, hospitals, and administrative buildings. As described above, there is one library and no hospitals in Woodside and the construction of up to 423 new homes over the 8-year planning period would not be of a magnitude that would trigger the need for new or expanded facilities elsewhere in the County. Redevelopment of the existing Town Hall and administrative building was completed fairly recently in 1990, so the Proposed Project would not require the construction of other public services facilities over and above those that have already occurred. As such, impacts would be less than significant.

Recreation

A significant impact would occur if implementation of the Proposed Project would result in one or more of the following:

- Criterion 1: 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;**

- Criterion 2: Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment;**

Project implementation would result in increased use of parks and recreational facilities in the Town and the surrounding area; however, given the extent of existing facilities in Woodside and the surrounding area and that development under the Proposed Project would result in up to 423 new housing units incrementally over the planning period, population growth with implementation of the Proposed Project would not be expected to result in the substantial physical deterioration of existing facilities or to require construction or expansion of recreational facilities to meet the needs of new residents. Therefore, a less than significant impact associated with the provision of new or expanded recreational facilities would occur.

4 Alternatives Analysis

The California Environmental Quality Act (CEQA) mandates consideration and analysis of alternatives to the Proposed Project. According to CEQA Guidelines, the range of alternatives “shall include those that could feasibly accomplish most of the basic purposes of the project and could avoid or substantially lessen one or more of the significant impacts” (CEQA Guidelines Section 15126.6 (d) (2)). Accordingly, the following discussion is intended to inform the public and decision makers of the feasible alternatives that would avoid or substantially lessen significant effects of the Proposed Project, and to compare such alternatives to the Proposed Project. As required under CEQA, the discussion includes an evaluation of the No Project Alternative to allow decision-makers to compare the impacts of approving the Proposed Project against the impacts of not approving it.

Case law provides that the discussion of alternatives need not be exhaustive and that alternatives be subject to a rule of reason. The impacts of the alternatives may be discussed “in less detail than the significant effects of the project proposed” (CEQA Guidelines Section 15126.6 (d)). Additionally, the CEQA Guidelines permit analysis of alternatives at a less detailed level for programmatic or plan-level EIRs than what is required for project EIRs. The CEQA Guidelines do not specify what constitutes an adequate level of detail, though they require that an EIR provide sufficient information to allow meaningful evaluation, analysis, and comparison of each alternative. CEQA Guidelines require that this analysis identify the environmentally superior alternative among those analyzed. Quantified information on the alternatives is presented where available; however, in some cases only partial quantification can be provided because of data or analytical limitations.

BACKGROUND

The Proposed Project involves a comprehensive update to the Town of Woodside General Plan Housing Element to account for changing demographics, market conditions, and projected housing need over an eight-year planning period that runs from 2023 through 2031. The Housing Element Update builds upon the goals, policies and implementing programs contained in the Town’s 2015-2023 Housing Element and other Town policies and practices to address housing needs in the community. The overall focus of the Housing Element is to preserve and enhance community life and character through the provision of adequate housing opportunities for people at all income levels, while being sensitive to the unique and historic character of Woodside that residents know and love.

In addition, the Proposed Project involves a General Plan amendment to change the General Plan Land Use designation of the High Road and Raymundo Drive Sites to permit residential uses. Amendments to the Zoning Law of the Town of Woodside would also be required for

implementation of the Proposed Project. Such amendments would add two new multi-family residential districts to the town. The Emerald Hills Specific Plan will need to be amended, as well. Finally, implementation of the Proposed Project also involves the adoption of objective design and development standards (ODS) applicable to the four multifamily sites identified in the Housing Element: High Road, Raymundo Drive, 773 Cañada Road, and Cañada College.

OBJECTIVES

State law requires the EIR to set forth the alternatives necessary to permit a reasoned choice that would avoid or substantially lessen any significant effects and feasibly attain most of the project objectives, described in Chapter 2, Project Description, of this Draft EIR. The following are the primary project objectives for the Proposed Project:

- Ensure the Town meets its RHNA obligations and achieves certification of the Housing Element as required under State law;
- Integrate a wider variety of housing types to broaden housing choice and ensure that there are opportunities available to people of all incomes and abilities in Woodside;
- Facilitate housing development on sites that can be most feasibly developed within the 2023-31 Housing Element Cycle to ensure that the Town can make sufficient progress toward its RHNA obligations and remain eligible for State funding, including funding for local roadway maintenance; and
- Allow housing development that is subordinate, sensitive, and complementary to the natural environmental and rural setting of Woodside.

As discussed in Chapters 3.1 through 3.10 of this Draft EIR, implementation of the Proposed Project would result in significant and unavoidable impacts related to greenhouse gas (GHG) emissions (Impacts 3.5-1 and 3.5-2) and transportation (Impact 3.7-2). Therefore, two alternatives to the Proposed Project that could potentially avoid or substantially reduce these significant impacts are analyzed in this chapter: a No Project Alternative and an Infill Alternative. Descriptions of each alternative and their impacts are provided below. A Reduced Development Alternative was also considered; however, for reasons discussed in Section 4.2, below, this Alternative was determined to be infeasible and therefore is not analyzed in detail.

4.1 Alternatives Analyzed in This EIR

NO PROJECT ALTERNATIVE

Consistent with Section 15126.6(e)(2) of the CEQA Guidelines, the No Project Alternative represents what would be reasonably expected to occur in the foreseeable future if the Proposed Project were not adopted and the Town's current 2012 General Plan, including the 2015-2023 Housing Element, was left unchanged and in use. This Alternative would retain all current land use designations and policies from the 2012 General Plan as amended to date. There would be no changes to the current General Plan Land Use designations, no Zoning Code amendments, and no adoption of objective design and development standards.

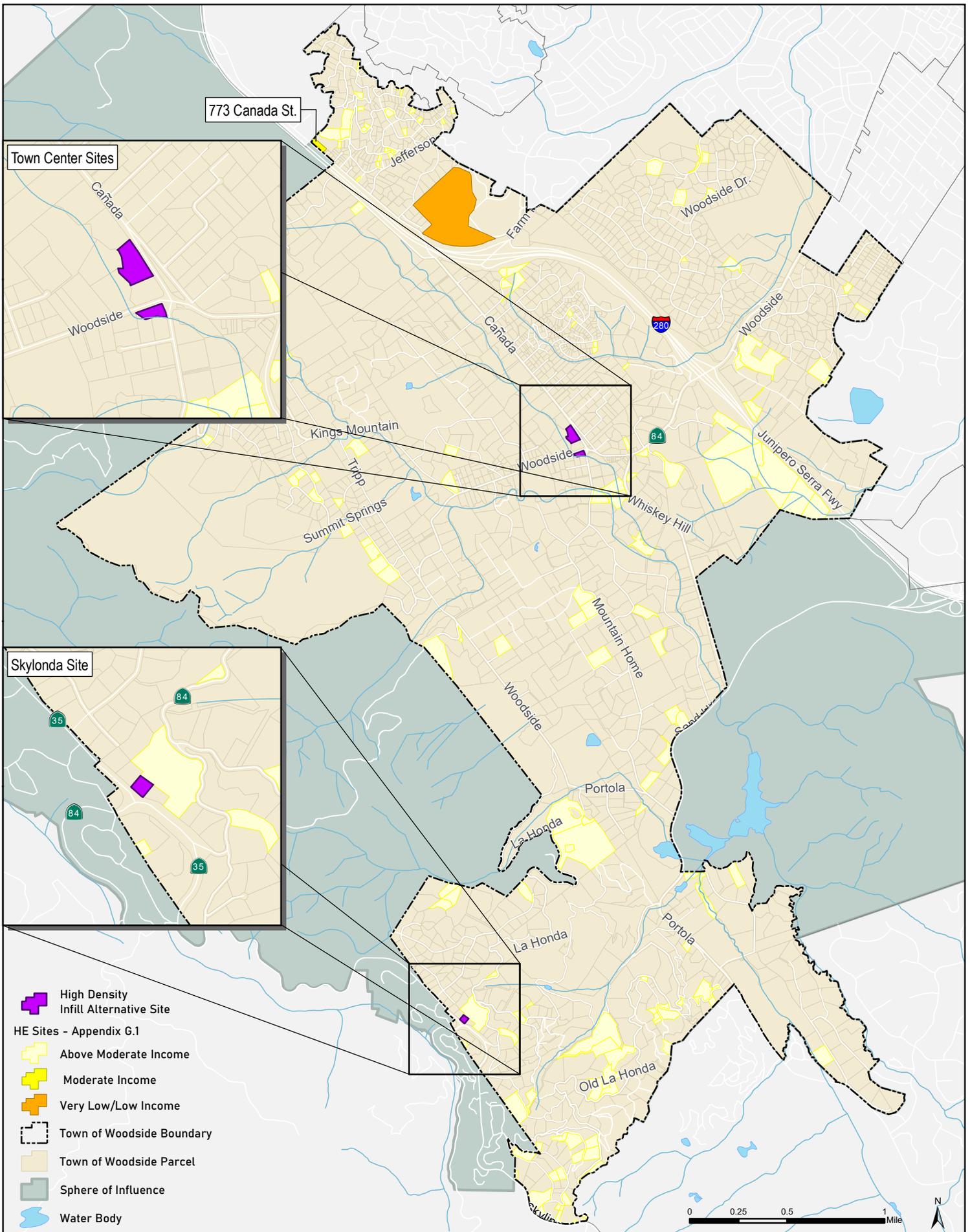
Overall, the No Project Alternative (Current Town General Plan) has a total RHNA allocation of 62 units as detailed in the Town's 2015-2023 Housing Element. During this planning period, the Town met its RHNA Cycle 5 units and exceeded the target number of units by 63 units, for a total of 125 units constructed during the planning period. Under these conditions it would be reasonable to assume that applications for new housing developments consistent with the current Housing Element would continue to be submitted and approved at vacant and underutilized sites in Woodside. As such, there would be 105 vacant single-family sites, 44 non-vacant single-family sites, 75 multifamily units at Cañada College, and 120 ADUs that would be developed under this Alternative for a total of 344 new units. This would not be sufficient to meet the Town's lower income RHNA allocation. Additionally, none of the Housing Element programs would be updated and there would be no code revisions to ensure compliance with new State law. As such, the Housing Element would not be certified under the No Project Alternative and the basic project objectives, including meeting the Town's RHNA Cycle 6 assignment, would not be achieved.

Although the No Project Alternative does not meet any of the Housing Elements Update project objectives and is not considered a feasible project alternative, it is presented below as required by the State CEQA Guidelines.

INFILL ALTERNATIVE

This Alternative would focus new multifamily housing on sites in the Town Center and Skylonda Center areas instead of on the Town-owned Raymundo Drive and High Road sites in order to reduce significant impacts related to VMT, traffic noise, and operational GHG emissions that could result from the Proposed Project. The total number of housing units would be the same as under the Proposed Project, but new housing would be focused in areas with existing shops, restaurants, and services to foster a more walkable mix of uses and a more compact development pattern to help reduce vehicle trips and associated traffic noise and GHG emissions and better support regional and statewide GHG emissions reductions goals. For illustrative purposes, the location of potential Infill Alternative sites is shown on Figure 4-1.

The General Plan land use designation applicable to the areas is Commercial, while the implementing zoning designation is Community Commercial. Neither currently permits multifamily housing, so to implement this Alternative the Town would amend the existing designations to permit multifamily development at 20 du/ac in these areas. Assuming development of multifamily housing at 20 du/ac on two properties with surface parking lots, buildout of this Alternative would result in 15 multifamily apartments in the Skylonda Center area and 29 multifamily apartments in the Town Center area. Other sites in the inventory, including Cañada College, would develop as envisioned under the Proposed Project and it is also projected that this Alternative would result in 120 new ADUs during the planning period. Overall, this Alternative would result in 423 new housing units, including 176 affordable to low and very low-income households, 65 affordable to moderate income households, and 182 affordable to above moderate households.



4-1 Infill Alternative Sites

Town of Woodside

Source: Dyett & Bhatta, 2024

4.2 Alternatives Considered but Not Evaluated in Detail in this EIR

A Reduced Development Alternative that could avoid or substantially reduce the significant impacts of the Proposed Project was considered; however, as described below, this Alternative was determined to be infeasible and therefore is not analyzed further.

REDUCED DEVELOPMENT ALTERNATIVE

A reduced amount of housing development was considered since it would likely have reduced impacts related to cumulative VMT, cumulative GHG emissions, and emergency evacuation capacity. Given that the automobile is the prevailing mode of transportation in the Town of Woodside, any housing development would likely require residents to use a private automobile. Thus, reduction in the number of housing units compared to the Proposed Project would likely result in fewer automobiles on the street and subsequent reduced VMT impacts and associated GHG emissions.

However, this Alternative would not meet the basic Project objectives. Under State law, each city and county in California must plan to accommodate its share of the regional housing need -- called the Regional Housing Needs Allocation (RHNA) -- for the coming 8-year planning period. Therefore, the number of housing units associated with the Proposed Project is required by State law. Consequently, this alternative would also be infeasible and is not analyzed further.

4.3 Impact Analysis of Alternatives

NO PROJECT ALTERNATIVE

Aesthetics

The No Project Alternative would result in fewer residential units compared to the Proposed Project. While this Alternative would have less overall development, the development that does occur would differ in scale and density from the Proposed Project, with sites identified for single-family homes.

While the overall amount and location of development would differ from the Proposed Project, existing design standards and guidelines for single-family development and ADUs would apply as under the Proposed Project. As with the Proposed Project, development under this Alternative would be required to comply with the Land Use and Circulation Element, Municipal Code, and the Town's Design Guidelines that regulate visual character and enforce protection measures for scenic vistas. Overall, impacts related to aesthetics and visual resources would remain less than significant. Given that there would be a lesser amount of development under the No Project Alternative, overall aesthetic impacts would be lessened compared to the Proposed Project.

Air Quality

Impacts under the No Project Alternative related to air quality during construction would be reduced in comparison to those of the Proposed Project because the overall amount of development proposed would be reduced and because the No Project Alternative would not involve construction of multifamily developments. This would result in a shorter duration for construction activities and reduced emissions of criteria pollutants. As with the Proposed Project, development under the No Project Alternative would be required to incorporate applicable control measures of the 2017 Clean Air Plan and would not disrupt or hinder implementation of any of these control measures. Future development projects would be required to implement the BAAQMD's Basic Construction Measures to control fugitive dust emissions generated during construction activities as a condition of project approval. In addition, future projects that cannot meet established BAAQMD construction screening criteria must prepare a detailed construction air quality impact assessment to incorporate measures to reduce construction emission impacts to levels below the BAAQMD's construction thresholds of significance for criteria air pollutants and TACs. As such, construction TAC impacts would be less than significant.

During operations, emissions under the No Project Alternative from area and building energy sources would be reduced compared to those of the Proposed Project because fewer housing units would be developed and the ones built would generally be smaller scale in nature. Given the lower total number of units involved, the No Project Alternative would generate fewer vehicle trips compared with the Proposed Project. This would reduce aggregate operational emissions impacts, not necessarily on a per capita basis, but would not eliminate them. Air quality impacts under the No Project Alternative would be reduced from the Proposed Project and would very likely also result in a less than significant impact.

Biological Resources

Under the No Project Alternative, residential development in the Planning Area would proceed but at fewer sites and lower densities compared to the Proposed Project. Because the No Project Alternative would still allow development, including construction and demolition, the Alternative would have potential impacts to special status species biological resources as with the Proposed Project. However, impacts would be reduced given that less development would occur on fewer sites under this Alternative. As such, biological resource impacts under the No Project Alternative would result in less-than-significant impacts with mitigation related to special-status species and wildlife movement and a less than cumulatively considerable contribution to significant cumulative biological resources impacts. It is assumed that individual developments would implement similarly applicable mitigation measures presented in Chapter 3.3 of the EIR as necessary to reduce biological resources impacts under the No Project Alternative.

Geology, Soils, and Seismicity

Under the No Project Alternative, development in the Planning Area would proceed as envisioned under the Town's 2015-2023 Housing Element Update. Excavation, grading, or demolition activities in the Planning Area would still occur at sites identified for development under the Housing Element. Because the No Project Alternative envisions development at reduced intensities compared to the Proposed Project, the No Project Alternative would have reduced impacts related

to fault rupture, ground shaking, landslides, liquefaction, and unstable soils compared with the Proposed Project. Buildout under the No Project Alternative would result in less-than-significant project-level impacts and a less than cumulatively considerable contribution to significant cumulative impacts with implementation of existing State, Municipal Code, and Town's Natural Hazards and Safety Element policies and regulations.

Greenhouse Gas Emissions

Under the No Project Alternative, demolition and construction activities would generate GHG emissions, as well as new operational sources of GHG emissions throughout the Planning Area. Given the reduced amount of development and the generally smaller scale of subsequent projects as compared to the Proposed Project, individual projects this Alternative would thus be expected to have a shorter duration for construction activities, which would result in reduced impacts from construction-related emissions. It is assumed that applicable mitigation measures presented in Chapter 3.5 of the EIR would be implemented as necessary to reduce construction-related GHG emissions impacts under the No Project Alternative.

Operation of land uses supported by the Alternative would generate direct and indirect GHG emissions similar to that of the Proposed Project. However, given there is less development under this Alternative, GHG emissions would be reduced, but not necessarily on a per capita basis. It is likely that the Alternative would still not meet the State's goals to achieve carbon neutrality by 2045, and operational impacts would remain significant and unavoidable, though less than that of the Proposed Project.

Overall, greenhouse gas impacts would be lessened compared to the Proposed Project. However, it is not possible to quantify the precise extent of reductions for the majority of the measures for a plan-level analysis. It is likely that GHG emissions from mobile sources would still conflict with goals of SB 743 under the No Project Alternative and it would have a significant and unavoidable impact.

Noise

Buildout of the No Project Alternative would result in fewer housing units than the Proposed Project. Therefore, less construction and associated construction noise and vibration would result, meaning reduced impacts would occur under this Alternative as compared to the Proposed Project. Development under this Alternative would be required to comply with all Town of Woodside General Plan policies and Municipal Code regulations to implement construction noise control measures. Average daily traffic volume on area roadways would be reduced under this Alternative as compared with the Proposed Project because this Alternative would result in fewer housing units. Overall, noise and vibration impacts under this Alternative would be less than significant with implementation of applicable local regulations and reduced compared to the Proposed Project.

Transportation

The No Project Alternative would accommodate fewer new residents in the Planning Area. Since the No Project Alternative would have lower development densities than the Proposed Project, it is estimated that this Alternative would result in higher VMT efficiency metrics (i.e., VMT per capita) compared to the Proposed Project. Although the goals and policies that would reduce VMT in the

General Plan and other planning documents would be implemented under the No Project Alternative, and while this alternative would involve construction of multifamily housing for faculty and students at Cañada College, overall, given the existing development pattern of the Town of Woodside, the distance to employment centers and the lack of transit service in Woodside, as with the Proposed Project, this alternative would not be sufficient to reduce per capita VMT consistent with SB743. There are no feasible mitigation measures available to reduce this impact to a less than significant level. Thus, the impact on VMT would be significant and unavoidable under the No Project Alternative and slightly more adverse than with the Proposed Project. The No Project Alternative impact on consistency with circulation system plans would be less than significant, similar to the Proposed Project, because other planning documents, such as the General Plan, would continue to be applicable under this Alternative. Similarly, the impacts on transportation hazards, and emergency access would remain less than significant because the Planning Area would continue to be consistent with applicable codes.

Tribal Cultural Resources

Under the No Project Alternative, excavation, grading, or demolition activities in the Planning Area would still occur. As such impacts would be roughly equivalent to the Proposed Project. Individual developments would be required to comply with General Plan policies and existing Town regulations that reduce the potential for impacts to cultural, tribal, and historic resources, as well as applicable State and local regulations presented in Chapter 3.8 of this EIR. As with the Proposed Project, impacts to cultural, tribal, and historic resources impacts would be less than significant under the No Project Alternative.

Utilities and Service Systems

As discussed in Section 3.9, Utilities and Service Systems, there would be sufficient water supply and wastewater treatment capacity to serve development under the Proposed Project in 2031. As the No Project Alternative would involve less development than the Proposed Project, there would also be sufficient water supply and wastewater treatment capacity for development pursuant to this Alternative. Further, subsequent developments would still be required to comply with applicable State and local regulations as well as related General Plan policies which promote reduction of water usage and increased conservation of water resources. Therefore, overall, this Alternative would result in a less than significant impact with respect to utilities and services systems and would have a reduced impact as compared to the Proposed Project, given the reduced amount of development involved.

Wildfire

In comparison with the Proposed Project, the No Project Alternative has a reduced development footprint within the Planning Area. As with the Proposed Project, the development under this Alternative would be required to adhere to State and local plans and regulations, including the Town's Natural Hazards and Safety Element policies and the programs in the Santa Cruz and San Mateo County Multi-Jurisdictional Local Hazard Mitigation Plan. Compliance with these policies and programs will ensure that development in the Planning Area is resilient to the risk of a wildfire under the Alternative. As with the Proposed Project, impacts from wildfire are considered less than significant for the No Project Alternative. However, impacts would be further reduced under this

Alternative since a smaller population under buildout would be less susceptible to wildfire risks and improve evacuation times.

INFILL ALTERNATIVE

Aesthetics

Under the Infill Alternative, development in the Planning Area would involve housing sites in the Town Center and Skylonda Center, as opposed to Town-owned sites identified for housing. In comparison to the Proposed Project, the Alternative would involve the densification of existing commercial areas, while leaving the natural setting at the Town-owned sites vacant. While development aesthetics would slightly differ under this Alternative compared to the Proposed Project, aesthetic impacts would still be roughly equivalent. However, since development is concentrated at greater densities in the center of the Town rather than throughout the entire Planning Area, impacts on scenic vistas would be less than that of the Proposed Project. Along scenic Interstate 280, development would only occur at Cañada College and not at the Town-owned sites, further reducing impacts on scenic highways. As with the Proposed Project, the Infill Alternative would be required to comply with the General Plan, Town Municipal Code, and the Town's Design Guidelines that regulate community character and aesthetics and enforce protection measures for scenic corridors and vistas. Development within the Cañada College campus would be subject to design standards and requirements in the Municipal Code that regulate lot dimensions, building height, and setback requirements (Municipal Code Section 153.110(C)). As such, aesthetics and visual resource impacts under the Infill Alternative would result in less-than-significant impacts related to scenic vistas, state scenic highways, public views, and light and glare.

Air Quality

Impacts under the Infill Alternative related to air quality during construction would be similar to those of the Proposed Project, which would result in construction activities of a similar magnitude and duration. As with the Proposed Project, the Infill Alternative would be required to incorporate applicable control measures of the 2017 Clean Air Plan and would not disrupt or hinder implementation of any of these control measures.

Similar to the Proposed Project, individual developments would be required to implement similarly applicable mitigation measures presented in Chapter 3.2 of the EIR as necessary to reduce air quality impacts under the Alternative. Future development projects would be required to implement the BAAQMD's Basic Construction Measures to control fugitive dust emissions generated during construction activities. In addition, future projects that cannot meet construction screening criteria would be required to prepare a detailed construction air quality impact assessment per MM-AQ-2 to incorporate measures to reduce construction emission impacts to levels below the BAAQMD's construction thresholds of significance for criteria air pollutants and TACs. As such, construction TAC impacts would be less than significant with mitigation incorporated, similar to the Proposed Project under this Alternative.

During operations, emissions under the Infill Alternative from area and building energy sources would be similar to those of the Proposed Project given that there would be the same number of housing units developed under this Alternative as the Proposed Project. However, the Infill

Alternative would help to reduce vehicle trips compared with the Proposed Project, so net operational air quality emissions under the Infill Alternative would be slightly lower than the Proposed Project. However, in both cases net operational air quality emissions would be less than significant.

Biological Resources

Under the Infill Alternative, development in the Planning Area would involve more housing on sites in areas with existing shops, restaurants, and services to foster a more walkable mix of uses and a more compact development pattern. Because the Infill Alternative would still allow development, including construction and demolition, the Alternative would have similar biological resources impacts compared to those of the Proposed Project. However, since development is concentrated at greater densities in the center of the Town and near Skylonda Center than throughout the entire Planning Area, impacts on special-status species that may reside near the town limits would be less than that of the Proposed Project. As such, biological resource impacts under the Infill Alternative would result in less-than-significant impacts with mitigation related to special-status species.

However, the Skylonda Center is in an area of habitat connectivity considered an irreplaceable and essential corridor. With more development in this area under the Alternative, there would be increased impacts on wildlife movement. However, the Town of Woodside General Plan and Municipal Code includes policies and regulations that would minimize or avoid adverse effects from development to the movement and corridors of migratory fish and wildlife species. The Conservation Element includes policies that would preserve, protect, and enhance the natural features, resources, and wildlife of the Planning Area. The Woodside Municipal Code Section 153.440 Stream Corridor Protection Ordinance requires protection of fish, riparian vegetation, and wildlife habitat and retention of major stream corridors in their natural state. Therefore, with adherence to local regulations and proposed mitigation measures, biological resources impacts would be reduced to a less-than-significant level under the Infill Alternative.

Geology, Soils, and Seismicity

Under the Infill Alternative, development in the Planning Area would proceed with the same number of housing units as envisioned under the Proposed Project. Excavation, grading, or demolition activities in the Planning Area would still occur at sites identified for development, however development would occur in the Town Center and Skylonda Center areas rather than on the Town-owned High Road and Raymundo Drive sites. Since this alternative would also involve development of sites in the wooded hillsides of the Town as with the Proposed Project, risk of landslides and slope instability would be similar to the Proposed Project. However, projects under the Infill Alternative would also be required to comply with existing State, Municipal Code, and the Town's Natural Hazards and Safety Element policies and regulations, as with the Proposed Project and as such would result in less-than-significant project-level impacts and a less than cumulatively considerable contribution to significant cumulative impacts.

Greenhouse Gas Emissions

Under the Infill Alternative, development in the Planning Area would proceed with the same number of housing units as under the Proposed Project. Demolition and construction activities would still occur throughout the Planning Area. This Alternative would thus be expected to have a similar duration for construction activities, which would result in roughly equivalent impacts from construction-related emissions. Operation of land uses supported by the Infill Alternative would generate direct and indirect GHG emissions similar to that of the Proposed Project. However, given that development would be more concentrated in areas with existing shops, restaurants, and services to foster a more walkable mix of uses in this Alternative, per capita GHG emissions would be slightly reduced due to more compact development patterns compared to the Proposed Project. Applicable mitigation measures presented in Chapter 3.5 of the EIR would be implemented as necessary to reduce construction-related and operational GHG emissions impacts under the Infill Alternative. Nevertheless, the Infill Alternative would still not meet the State's goals to achieve carbon neutrality by 2045, and operational impacts would remain significant and unavoidable with implementation of all feasible mitigation, though with a reduced impact as compared to the Proposed Project.

Overall, greenhouse gas impacts would be lessened compared to the Proposed Project. However, it is not possible to quantify the precise extent of reductions for the majority of the measures for a plan-level analysis. It is likely that GHG emissions from mobile sources would still conflict with goals of SB 743 under the Infill Alternative and it would have a significant and unavoidable impact, though less than that of the Proposed Project.

Noise

Buildout of the Infill Alternative would result in the same number of housing units as the Proposed Project. Therefore, similar construction and associated construction noise and vibration would result, meaning roughly equivalent impacts would occur under this Alternative as compared to the Proposed Project. Development under the Infill Alternative would be required to comply with all applicable Town of Woodside General Plan policies and Town Municipal Code regulations related to construction noise control measures, as well as mitigation measures proposed in Chapter 3.6 of this EIR, which require construction noise reduction best practices. As a result, construction noise and vibration levels would be similar under this Alternative compared with the Proposed Project.

For operational impacts, residential development is not likely to generate noise levels that would exceed the Town's standards. However, future development associated with this Alternative would result in an increase in traffic in and adjacent to the Planning Area, particularly in the Town Center and Skylonda Center area. Even so, under the Proposed Project, none of the roadway segments are projected to exceed a 1 dB increase in noise levels. As such, under this Alternative an increase in roadway noise levels is unlikely to exceed 3 dB which is the threshold that would constitute a significant impact. Operational impacts would remain less than significant, but slightly greater than the Proposed Project with greater densities in the Town Center and Skylonda Center area.

Overall, noise and vibration impacts under this Alternative would be less than significant with implementation of applicable local regulations and mitigation.

Transportation

The Infill Alternative would result in slightly reduced impacts on transportation compared to the Proposed Project. This Alternative would accommodate the same number of housing units as the Proposed Project; however, development would occur on sites in the Town Center and Skylonda Center areas. Given that this development pattern would locate more residents in proximity to existing shops and services in Woodside, it is estimated that the Infill Alternative would result in slightly lower VMT efficiency metrics (i.e., VMT per capita) compared to the Proposed Project. As with the Proposed Project, the goals and policies that would reduce VMT in the General Plan and other planning documents would be implemented under the Infill Alternative as well as the mitigation measure introduced in Chapter 3.7 of this EIR, which requires VMT reduction measures for Cañada College housing development. Nevertheless, given that Woodside is a predominantly low density rural residential community with few jobs locally, the Infill Alternative would also not achieve a 15 percent reduction in per capita townwide VMT by 2031. Thus, similar to the Proposed Project, the impact on VMT would remain significant and unavoidable under the Infill Alternative but less than that of the Proposed Project.

Under the Infill Alternative, the impact on consistency with circulation system plans would be less than significant, similar to the Proposed Project, with adherence to existing General Plan and Town Code regulations.

Tribal Cultural Resources

Under the Infill Alternative, development in the Planning Area would involve the same number of housing units as under the Proposed Project. Excavation, grading, or demolition activities in the Planning Area would still occur as with the Proposed Project, except without development on the Town-owned sites. Given that the Town-owned sites are vacant parcels and the Town Center and Skylonda Center area have already been previously developed, there is less of a chance that tribal cultural resources would be encountered and impacted under this Alternative. As such, tribal cultural resource impacts under the Infill Alternative would result in less-than-significant impacts with mitigation and with slightly fewer impacts compared to the Proposed Project. Therefore, applicable State regulations and mitigation measures which require cultural resource awareness training for construction personnel presented in Chapter 3.8 of this EIR would be implemented as necessary to reduce tribal cultural resources impacts under the Infill Alternative.

Utilities and Service Systems

As discussed in Section 3.9, Utilities and Service Systems, there would be sufficient water supply, wastewater treatment capacity, and solid waste disposal capacity to serve development under the Proposed Project. The Infill Alternative would involve a similar amount of development than the Proposed Project, and therefore there would also be sufficient water supply and solid waste disposal capacity for development pursuant to this Alternative. However, both development in the Town Center and Skylonda area would require connections to wastewater districts, the construction of which could cause significant environmental effects. As such, this would have a potentially significant impact and impacts would be more adverse than the Proposed Project. Even so, subsequent developments would also be required to comply with applicable General Plan policies which require developments to increase conservation of water resources and minimize stormwater

drainage. Overall, this Infill Alternative would result in a significant and unavoidable impact with respect to utilities and services systems and would have greater impacts as compared to the Proposed Project, given the wastewater connections needed for the Town Center and Skylonda area.

Wildfire

The Infill Alternative would involve the same number of housing units as the Proposed Project, however, new housing would be developed in the Town Center and Skylonda Center areas, instead of on Town-owned sites. As with the Proposed Project, buildout of the Infill Alternative would also increase the risk of loss of life and structures due to wildfire given the number of vacant and underutilized residential sites in Very High Fire Hazard Severity Zones. However, there would be increased development in the Skylonda Center area which is in a Very High Fire Hazard Severity Zone, while one of the two Town-owned sites are not.

As with the Proposed Project, the development under this Alternative would be required to adhere to State and local plans and regulations, including the Town's Safety Element policies. The California Fire Code includes safety measures to minimize the threat of fire, the California Building Code includes specific requirements related to exterior wildfire exposure, and the California Code of Regulations sets forth the minimum development standards for emergency access, fuel modification, setback, signage, and water supply, which help prevent loss of structures or life by reducing wildfire hazards. The Town's Safety Element Policy NH2.1 also establishes Interstate 280, Woodside Road, and arterial roads as evacuation routes for use in the event of emergency. Compliance with these policies and mitigation measures included in the Proposed Project would reduce risks to the maximum extent practicable but would not preclude significant impacts. As with the Proposed Project, impacts from wildfire are considered less than significant for the Infill Alternative, but impacts would be slightly greater compared to the Proposed Project given there is more development in fire hazard zones.

4.4 Environmentally Superior Alternative

The CEQA Guidelines Section 15126.6 requires the identification of an environmentally superior alternative among the alternatives analyzed in an EIR. If the No Project Alternative is identified as the environmentally superior alternative, the guidelines require another environmentally superior alternative to be identified.

Table 4-1 summarizes the alternatives' overall environmental impacts for each topic presented in Section 4.3. For the Proposed Project, three impacts were expected to be significant and unavoidable, five impacts were expected to be less than significant with mitigation, 20 impacts were expected to be less than significant, and one impact was expected to have no impact.

For the No Project Alternative, similar to the Proposed Project, three impacts were expected to be significant and unavoidable, four impacts were expected to be less than significant with mitigation, 21 impacts were expected to be less than significant, and one impact was expected to have no impact. However, impacts would be marginally reduced for aesthetics, air quality and GHG emissions, special-status species, noise, utilities, and emergency response as compared to the

Proposed Project, while impacts related to VMT would be more severe. For the Infill Alternative, four impacts were expected to be significant and unavoidable, five impacts were expected to be less than significant with mitigation, 19 impacts were expected to be less than significant, and one impact was expected to have no impact. However, impacts would be marginally reduced for scenic vistas and highways, special-status species, air quality and GHG emissions, and VMT as compared to the Proposed Project.

The No Project Alternative reduces the greatest number of environmental impacts. Since the CEQA Guidelines require another environmentally superior alternative other than the No Project Alternative to be identified, the Infill Alternative would be the environmentally superior alternative. This is because it nominally reduces the Proposed Project’s significant and unavoidable impacts pertaining to GHG emissions and VMT. However, the Infill Alternative would not meet all the project objectives. While it would support most of the project objectives, including those related to ensuring the Town meets its RHNA obligations and integrating a wider variety of housing types to accommodate residents of all income levels, it would not facilitate housing development on sites that can most feasibly be developed within the 2023-31 Housing Element Cycle. Due to a lack of owner interest, increased development at the Town Center and Skylonda Center area would be unlikely. As owner interest is an important consideration in demonstrating the viability of housing sites for redevelopment in the planning period, the Infill Alternative may not achieve certification of the Housing Element by the California Department of Housing and Community Development. Further, though the Infill Alternative has nominally reduced the number of impacts compared to the Proposed Project, it would have worse impacts on utilities, wildlife corridors, noise, and wildfire risks.

Table 4-1: Summary of Impacts for Alternatives

Impact	Level of Significance		
	Proposed Project	No Project Alternative	Infill Alternative
3.1 Aesthetics			
3.1-1 Scenic Vistas	LTS	LTS, -	LTS, -
3.1-2 Scenic Highways	LTS	LTS, -	LTS, -
3.1-3 Visual Character	LTS	LTS, -	LTS, =
3.1-4 Light and Glare	LTS	LTS, -	LTS, =
3.2 Air Quality			
3.2-1 Air Quality Plan	LTS	LTS, =	LTS, =
3.2-2 Air Quality Standard	LTSM	LTSM, -	LTSM, -
3.2-3 Sensitive Receptors	LTSM	LTSM, -	LTSM, -
3.2-4 Odors	LTS	LTS, -	LTS, =
3.3 Biological Resources			
3.3-1 Special-Status Species	LTSM	LTSM, -	LTSM, -
3.3-2 Sensitive Habitat	LTS	LTS, =	LTS, =
3.3-3 Wetlands	LTS	LTS, =	LTS, =
3.3-4 Wildlife Corridors	LTS	LTS, =	LTS, +

Table 4-1: Summary of Impacts for Alternatives

Impact	Level of Significance		
	Proposed Project	No Project Alternative	Infill Alternative
3.4 Geology, Soils, and Seismicity			
3.4-1 Seismic Hazards	LTS	LTS, -	LTS, =
3.4-3 Unstable Soils	LTS	LTS, -	LTS, =
3.5 GHG Emissions			
3.5-1 Generate GHG Emissions	SU	SU, -	SU, -
3.5-2 Conflict with an Applicable Plan, Policy, or Regulation	SU	SU, -	SU, -
3.6 Noise			
3.6-1 Noise Standards	LTSM	LTS, -	LTSM, +
3.6-2 Vibration	LTS	LTS, -	LTS, =
3.6-3 Airports	NI	NI, =	NI, =
3.7 Transportation			
3.7-1 Circulation System Plan	LTS	LTS, =	LTS, =
3.7-2 VMT	SU	SU, +	SU, -
3.7-3 Traffic Hazards	LTS	LTS, =	LTS, =
3.7-4 Emergency Access	LTS	LTS, =	LTS, =
3.8 Tribal Cultural Resources			
3.8-1 Tribal Cultural Resources	LTSM	LTSM, =	LTSM, -
3.9 Utilities and Service Systems			
3.9-1 Facilities	LTS	LTS, -	SU, +
3.10 Wildfire			
3.10-1 Emergency Response/Evacuation	LTS	LTS, -	LTS, +
3.10-2 Wildfire Risks	LTS	LTS, =	LTS, +
3.10-3 Infrastructure	LTS	LTS, =	LTS, =
3.10-4 Flooding or Landslides	LTS	LTS, =	LTS, =

Notes:

LTS = Less than Significant

LTSM = Less than Significant with Mitigation

NI = No Impact

SU = Significant and Unavoidable

+/-/= Impact of the alternative is greater than, less than, or similar to the impact of the Proposed Project

5 CEQA Required Conclusions

This section presents a summary of the impacts of the Proposed Project in several subject areas specifically required by CEQA, including growth-inducing impacts, cumulative impacts, significant and unavoidable impacts, and significant irreversible environmental changes. These findings are based, in part, on the analysis provided in Chapter 3: Environmental Settings and Impacts.

5.1 Growth-Inducing Impacts

CEQA Guidelines require that an EIR “discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly” (CEQA Guidelines Section 15126.2(e)). This analysis must also consider the removal of obstacles to population growth, such as improvements in the regional transportation system.

Growth-inducing impacts, such as those associated with job increases that might affect housing and retail demand in surrounding jurisdictions over an extended time period, are difficult to assess with precision, since future economic and population trends may be influenced by unforeseeable events such as business development cycles and natural disasters. Moreover, long-term changes in economic and population growth are often regional in scope; they are not influenced solely by changes or policies related to a single city or development project, particularly in a highly urbanized region such as the San Francisco Bay Area. Business trends are influenced by economic conditions throughout the State and country, as well as around the world.

Another consideration is that the creation of growth-inducing potential does not automatically lead to growth. Growth occurs through capital investment in new economic opportunities by the private or public sector. These investment patterns reflect, in turn, the desires of investors to mobilize and allocate their resources to development in particular localities and regions. These factors, combined with the regulatory authority of local governments, mediate the growth-inducing potential or pressure created by a proposed project. Despite these limitations on the analysis, it is still possible to qualitatively assess the general potential growth-inducing impacts of the Proposed Project.

PROJECTED GROWTH

The Proposed Project is intended to result in the development of up to 423 housing units, primarily comprised of smaller scale infill development in established residential neighborhoods, with some additional multi-family housing to provide varied housing types. Smaller-scale development includes vacant and underutilized single-family residences and development of accessory dwelling units (ADUs). Thus, the Project would not involve extending infrastructure, utilities, or public services outside of established residential neighborhoods; on the contrary, it would concentrate new

development within the existing service area for utilities and public services. Further, development would happen incrementally over the course of eight years, from 2023-2031, which would minimize project growth impacts.

Population

As shown in Table 5-1, the current population within the Town of Woodside is estimated to be 5,248. With the Proposed Project, the Planning Area would accommodate a total population of approximately 6,267 people, representing a 19.4 percent increase from the existing population. This represents an average annual growth rate of about 2.4 percent over eight years in the Planning Area, along with an increase in the number of housing units from 2,178 to 2,601.

Table 5-1: Planning Area Population, Housing, and Job Growth Projections, 2020–2031

	<i>Existing (2021)</i>	<i>Projected Net New (2031)</i>	<i>Total Projected with Proposed Project (2031)</i>
Population	5,248 ²	1,019 ¹	6,267
Housing Units	2,178 ³	423	2,601
Jobs	1,690 ⁴	n/a	1,690

Notes:

1. Projected new population is calculated from multiplying the projected housing units and the town’s vacancy rate of 11.4 percent. This value is then subtracted from the projected housing units and then multiplied by the town’s average household size of 2.72 persons. Vacancy rates and average household size data are from the State of California Department of Finance, E-5 Population and Housing Estimates for Cities, Counties, and the State (2021).

Sources:

2. State of California Department of Finance, E-5 Population and Housing Estimates for Cities, Counties, and the State (2021)
3. State of California Department of Finance, E-5 Population and Housing Estimates for Cities, Counties, and the State (2021)
4. U.S. Census Bureau, Longitudinal Employer-Household Dynamics, Origin-Destination Employment Statistics, 2021

Although the population within the Planning Area is projected to increase, the Proposed Project is consistent with the overarching regional growth goals identified in Plan Bay Area, the integrated land use/transportation plan for the nine-county San Francisco Bay Area region. To reduce greenhouse gas emissions, Plan Bay Area 2050 promotes compact mixed-use infill development within walkable/bikeable neighborhoods that are close to public transit, jobs, schools, shopping, parks, recreation, and other amenities. To ensure consistency, the Proposed Project generally involves smaller scale infill development in established residential neighborhoods, with some additional multi-family housing to provide varied housing types. Smaller-scale development includes vacant and underutilized single-family residences and development of accessory dwelling units (ADUs).

The Proposed Project is also consistent with the Town of Woodside General Plan’s goals of encouraging sustainable building practices and preserving Woodside as a scenic, rural residential

community. By guiding the majority of the Town's growth and development within the Planning Area, infill development would be prioritized, and public space areas would be preserved and enhanced; by design, the Proposed Project thus reduces the potential for uncontrolled growth and associated impacts.

Increase in Regional Housing Demand

In the urbanized context of the Bay Area, housing and employment demand are somewhat fluid across municipalities. As the employment base in the Bay Area continues to increase, more people may be drawn to live in Woodside even if they work in other nearby cities, or vice versa. As a result, housing demand may continue to increase in Woodside and San Mateo County. ABAG's Regional Housing Needs Assessment (RHNA) attempts to balance regional housing demand across Bay Area cities, and all municipalities are required to provide a "fair share" of housing. According to the Final 2023–2031 RHNA, ABAG has determined that Woodside's fair share of regional housing need for the 2023 to 2031 period would be 328 units. To ensure that housing is available to meet the needs of future residents under the Proposed Project, the Town is currently updating its Housing Element to assess its supply of housing and provide policies and programs to ensure that the community continues to meet its fair share of regional housing needs.

Jobs/Housing Ratio

A desirable jobs-to-housing ratio is often defined as a ratio greater than 1.0 but less than 2.0. Because most households have more than one wage earner, ratios below 1.0 suggest that residents are required to commute to jobs outside of their area of residence, and ratios greater than 2.0 suggest that employers are not able to house their workers within the jurisdiction, requiring workers to commute into the area. Theoretically, a balanced jobs-to-housing ratio would reduce the need for people to commute in or out of the area for work. In reality, the match of education, skills, and interests is not always accommodated within the boundaries of one community, and regional interdependencies almost always result in at least some inter-city commuting.

Based on the estimated buildout of up to 423 housing units under the Proposed Project, the jobs-to-housing balance in the Planning Area in 2031 would be about 1.54, as shown in Table 5.1-2: Jobs-to-Housing Unit Ratio. Given that the Proposed Project is associated with housing development within the Town limits and does not propose additional jobs, the Proposed Project would not be expected to induce substantial new unplanned residential growth in areas surrounding the Planning Area.

Table 5-2: Jobs-to-Housing Unit Ratio (2019 and 2031)

	Existing (2021)	Total Projected with Proposed Project (2031)
Housing Units	2,178 ¹	2,601
Jobs	1,690 ²	1,690
Jobs-to-Housing Unit Ratio	1.29	1.54

Sources:

1. State of California Department of Finance, E-5 Population and Housing Estimates for Cities, Counties, and the State (2021)
2. State of California Department of Finance, E-5 Population and Housing Estimates for Cities, Counties, and the State (2021)

Public Facilities and Services

Public services for the Planning Area, including police, fire protection, schools, and parks and recreation, are currently provided by the San Mateo County Sheriff's Office, Woodside Fire Protection District (WFPD), the Woodside School District, the Midpeninsula Regional Open Space District, San Mateo County Parks, and the Woodside Department of Public Works, respectively. Development under the Proposed Project would be required to comply with all applicable codes for fire safety and emergency access.

As stated in the Initial Study and Environmental Checklist for this EIR, the only school located within the Town boundary is Woodside Elementary School, which operates under the Woodside School District. The school served 383 students in kindergarten through eighth grade in the Town of Woodside during the 2020-2021 enrollment year (Woodside Elementary School District, 2021). Enrollment for the school has decreased slightly over the past few years, with a total of 415 students during the 2018-2019 school year and 386 students during the 2019-2020 school year. Woodside is additionally served by three other elementary school districts, which include La Lomitas, Portola Valley, and Redwood City. Each district serves grades kindergarten through eighth.

Implementation of housing programs in the Proposed Project would involve construction of up to 423 housing units throughout the Town. While many of these new housing units would be ADUs and smaller apartments for singles, and college students, it is reasonably foreseeable that some of these units would support families with children that may attend the surrounding school districts. New students of various ages would be enrolled incrementally over the 8-year planning period. Therefore, in view of the Woodside Elementary's recent enrollment trend and the fact that Woodside is served by three other elementary school districts, the incremental increase in enrollment resulting from the Proposed Project would not necessitate the construction or expansion of new school facilities and this impact would be less than significant. Further, development under the Proposed Project would be also required to comply with SB 50, which mandates statutory school facilities fees for residential developments. Compliance with SB 50 would financially offset impacts on Woodside School District capacity and would provide funding for potential future school facility development needs associated with the Proposed Project-related population increase.

As future buildout occurs under the Proposed Project, the Town will evaluate operations and deployment of services to efficiently use resources, ensure sufficient staffing to serve all new development and associated population growth in the Planning Area, and monitor the need for new facilities or additional equipment needed to provide adequate public services to future and existing residents.

DIRECT AND INDIRECT GROWTH

As described above, the Proposed Project facilitates growth in the Planning Area, and this direct growth is analyzed throughout this EIR. Impacts from direct growth on infrastructure such as utilities, the transportation system, and natural resources are identified, based on the buildout of the Proposed Project. Some of the identified effects of growth are significant and unavoidable. In general, future development under the Proposed Project would be subject to additional site-specific environmental review under CEQA, with tiering and streamlining opportunities as provided for under State law.

Indirect growth can result from the construction of infrastructure, such as the extension of utilities or the construction of new roadways connecting urban centers to green field areas. In such cases, this extension of infrastructure to serve one property can facilitate the subsequent development of other intervening properties, effectively inducing additional growth indirectly. Such infrastructure in the Proposed Project could include road and utility connections to sites designated for new residential development. However, given that proposed development would occur in existing residential neighborhoods and within the Town limits, the potential for this type of indirect growth does not exist. Further, the Proposed Project primarily consists of smaller scale infill development in established residential neighborhoods, with some additional multi-family housing to provide varied housing types. This could encourage more teachers, restaurant and service workers, firefighters, police officers, and others employed in Woodside and San Mateo County to live within the Planning Area rather than commute long distances, consistent with overarching regional and State objectives for sustainable development and reduction of GHG emissions and VMT.

5.2 Cumulative Impacts

CEQA requires that an EIR examine cumulative impacts. As discussed in CEQA Guidelines Section 15130(a)(1), a cumulative impact “consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts.” Furthermore, the analysis of cumulative impacts need not provide the level of detail required of the analysis of impacts from the project itself, but shall “reflect the severity of the impacts and their likelihood of occurrence.” (CEQA Guidelines Section 15130(b)).

In order to assess cumulative impacts, an EIR must analyze either a list of past, present, and probable future projects or a summary of projections contained in an adopted general plan or related planning document. The cumulative impact analysis in this Draft EIR relies on the projections approach because the Project has a long-term perspective. Unless so stated, the potential for cumulative contributions is projected to the Proposed Project horizon year of 2031. The geographic context for cumulative impacts is generally the Planning Area and immediately

surrounding lands but can be a much larger area for resource categories such as greenhouse gas emissions and transportation.

Several analyses presented in Chapter 3: Environmental Settings and Impacts represent cumulative analyses of issues through the Proposed Project horizon year of 2031 because they combine the anticipated effects of the Proposed Project with anticipated effects of regional growth and development. By their nature, the transportation, noise, greenhouse gas emissions, and climate change analyses presented in Chapter 3 represent a cumulative analysis, because the effects specific to the Proposed Project cannot reasonably be differentiated from the broader effects of regional growth and development. Thus, analyses for these topics reflect not just growth in the Planning Area, but growth elsewhere in the region as well. The cumulative conclusions are summarized there, and where applicable, significant unavoidable impacts are listed in Section 5.3, Significant and Unavoidable Impacts. Other cumulative impacts are identified below.

AESTHETICS

The cumulative geographic context for aesthetics is the Planning Area as well as view corridors, view sheds, or scenic resources in the immediate vicinity and visible from the Planning Area.

The scenic resources in the Planning Area and immediate vicinity include views of the western hillsides as seen from the valley below, and those of the valley as seen from the hillsides. A significant cumulative impact would result if development facilitated in the Planning Area in combination with other development in the vicinity blocked views of scenic vistas from public vantage points. Development in the Planning Area would occur within the Town limits and would be regulated by the Town of Woodside General Plan. Specifically, the General Plan Circulation Element calls for maintenance and improvement of the physical condition and safety of Town roadways, while preserving the Town's rural and scenic environment (Policy CL2.1). The Circulation Element also calls for the protection of scenic corridors, including State scenic highways Skyline Boulevard and Interstate 280, as well as local scenic roads mentioned above (Policy CL2.2). All structures and site developments proposed in the scenic corridors along designated State scenic highways and Town scenic roads would be subject to Architectural and Site Plan Review to ensure appropriateness of design and materials, proper placement of structures, and landscape design in order to preserve and enhance scenic vistas.

To implement these General Plan policies, the Municipal Code incorporates certain requirements. All proposed projects within scenic corridors will require review for compliance with the Town's evaluation criteria of community character, site planning, building design, and landscape elements (Municipal Code Section 153.911 and 153.912). Projects will be assessed on their design and if a proposed project is developed in a manner which respects the character of scenic corridors and vistas, and if the project preserves the natural and scenic character of Woodside.

Therefore, foreseeable developments in these areas are not likely to result in structures tall enough to block scenic views and vistas. Overall, with implementation of General Plan policies and existing Town regulations in place, substantial adverse effects on scenic vistas and scenic corridors in the Planning Area would be minimized to the extent practicable and associated cumulative impacts would be less than significant.

Implementation of the Proposed Project in combination with other development in the vicinity would introduce new sources of light within the cumulative geographic context, including light spillover from buildings, outdoor security lights, and vehicle headlights, in addition to glare produced by reflective surfaces and unshielded equipment. A significant impact would occur if these new sources of light had an adverse impact on day and nighttime views in the area.

Future development within the Planning Area would primarily be within existing residential neighborhoods that already have sources of light and glare. All new development would be required to comply with Town of Woodside regulations, including Municipal Code Section 153.213 that governs Outdoor Lighting. Town Code stipulates all outdoor lighting fixtures shall not shine or glare on adjacent public or private roads or properties, and lighting patterns or illuminated areas shall be contained within the boundaries of the property on which the lighting is located. Further, the Town's Residential Design Guidelines includes a detailed section in the Landscape Elements about Lighting, which includes guidelines about site and landscape lighting, fixture style and design, and exterior fixtures. Compliance with California Building Code (CBC) standards would also minimize glare from sunlight reflecting off building windows. Compliance with these regulations would minimize impacts from light and glare and associated cumulative impacts would be less than significant.

Development under the Proposed Project would comply with applicable policies and standards for new development as well as regulations governing scenic quality in the already developed area, including the Town Code and General Plan. Impacts from the Proposed Project, in conjunction with other plans and projects in the region that could conflict with existing zoning or other regulations which govern scenic quality, are not cumulative in nature. Cumulative impacts would be less than significant.

AIR QUALITY

The cumulative geographic context for air quality is the BAAQMD Air Basin, which includes the nine counties that surround San Francisco Bay: Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, southwestern Solano, and southern Sonoma counties. As discussed in Section 3.2, Air Quality, according to the BAAQMD's CEQA Guidelines, to meet the Threshold of Significance for operational-related criteria air pollutant and precursor impacts for plans (other than regional plans), a proposed plan must satisfy the following criteria.¹

- Consistency with current air quality plan (AQP) control measures (this requirement applies to project-level as well as plan-level analyses).
- A proposed plan's projected VMT or vehicle trips (VT) (either measure may be used) increase is less than or equal to its projected population increase.

As discussed under Impact 3.2-1, the Proposed Project would support the goals of the BAAQMD's 2017 Clean Air Plan, by including all applicable control measures, and would not conflict with its implementation. The Proposed Project's objectives and principles would ultimately reduce the severity of growth-oriented criteria pollutants, relative to conditions without the Proposed Project. Further, the VMT forecasts indicate that, at buildout, the Proposed Project would result in a home-

¹ Bay Area Air Quality Management District. 2022. California Environmental Quality Act. Air Quality Guidelines. Available: <https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines>. Accessed: August 16, 2023.

based VMT per capita that is 10.4 percent below the baseline 2019 Town VMT per capita, which is less than the projected population increase. As such, operational impacts from implementation of the Proposed Project would be less than significant.

Further, to ensure the Proposed Project achieves consistency with the BAAQMD's construction thresholds, the EIR includes **Mitigation Measure AQ-1 and AQ-2**. Mitigation Measure AQ-1 requires future project development projects to implement the BAAQMD's Basic Construction Measures to control fugitive dust emissions generated during construction activities. Mitigation Measure AQ-2 requires future projects that cannot meet construction screening criteria to prepare a detailed construction air quality impact assessment to: 1) estimate potential project construction emissions; 2) compare potential project construction emissions against BAAQMD project-level construction thresholds of significance; and 3) incorporate measures to reduce construction emission impacts to levels below the BAAQMD's construction thresholds of significance for criteria air pollutants and TACs. As such, this impact would be less than significant with mitigation.

As discussed under Impact 3.2-3, a quantitative evaluation of potential health risk impacts for the Proposed Project is not possible. However, Mitigation Measures AQ-1 through AQ-2 would ensure that the Proposed Project's TAC construction emissions are reduced below BAAQMD thresholds.

Therefore, the Proposed Project's contribution to cumulative air quality impacts would be less than cumulatively considerable.

BIOLOGICAL RESOURCES

The cumulative geographic context for biological resources consists of the Planning Area and the immediate vicinity. Development associated with the Proposed Project through the horizon year of 2031 could contribute to the loss of natural lands in the Planning Area, with potential effects on special-status species, sensitive natural communities, federally protected wetlands, wildlife and fish movement corridors, and invasive species.

As described above, the Planning Area is largely developed and located entirely within the Town limits, in the highly urbanized context of the San Francisco Bay Area. However, the Town of Woodside contains a wide variety of natural and biological resources, including gentle oak and grassland foothills, flatter valley areas, valley stream corridors containing riparian habitat, as well as flood plains, groundwater aquifers and seismic rift zones. The portion of Town east of Interstate 280 is predominantly mixed oak woodland. The Town's location provides a natural habitat for flora and fauna, including some endangered and threatened plant and wildlife species, while the riparian corridors along the creeks provide corridors for wildlife movement.

Thus, future development within the Planning Area and the immediate vicinity has the potential to have significant impacts on biological resources. In particular, there are several special-status species known to occur throughout the Planning Area that could be impacted by housing development. Mitigation measures need not be applied to every development, only if required pursuant to pre-construction surveys. For the Proposed Project, impacts would be further reduced through Mitigation Measure BIO-1, which would require implementation of a worker environmental awareness training program to train construction staff on the needs of protecting sensitive biological resources and the ramifications for not complying with applicable laws. Mitigation Measure BIO-2 would require the installation of temporary flagging or barrier fencing

to protect sensitive biological resources adjacent to the work area as warranted based on the findings of the site assessment completed pursuant to Mitigation Measure BIO-1. Further, Mitigation Measures BIO-3 through BIO-5 outline additional construction requirements to ensure the protection of special-status plant species, bat species, and Western bumble bee, as warranted based on the findings of the site assessment.

Development in the Planning Area would also be required to adhere to regulations in the Town Code and General Plan. The Conservation Element includes a policy to plan development sensitively to preserve natural features and landscaping and includes a strategy where if a species of concern is identified, the Town shall require preparation of biotic reports and pre-construction surveys by a professional biological consultant in order to identify and mitigate potential impacts (Policy CV1.1). The Conservation Element also includes a policy that aims to retain and restore native flora and fauna habitat and populations by minimizing the removal of vegetation, using native and fire-resistant plants, avoiding topsoil destruction, and avoiding impacts to habitat and wildlife corridors by use of structures and fences. (Policy CV1.3).

Moreover, the purpose of Woodside Municipal Code Section 153.440 Stream Corridor Protection Ordinance is to protect fish, riparian vegetation, and wildlife habitat and to retain major stream corridors in their natural state. The ordinance defines stream corridor as a horizontal distance of 50 feet, measured from each side of the center line of the stream, or a horizontal distance of 25 feet, measured from the top of the stream or creek bank, whichever is greater. The ordinance also stipulates no removal of riparian vegetation shall be permitted within the stream corridor, as well as no structures shall be permitted within the stream corridor. Additionally, development resulting from the Proposed Project, as well as future development projects that could occur within the Planning Area or in the vicinity of the Planning Area, would be subject to the requirements of biological resource protection laws, including FESA, CESA, MBTA, and the California Fish and Game Code, as well as protection policies and provisions in the Town's General Plan and Town Code.

With implementation of Mitigation Measures BIO-1 through BIO-11 and compliance with federal, state, and local regulations, the Proposed Project's contribution to cumulative biological resources impacts would be less than cumulatively considerable.

GEOLOGY, SOILS, AND SEISMICITY

The cumulative geographic context for geology and soils consists of sites within the Planning Area and nearby properties in the immediate vicinity. Although regional geographies can be similar, in general, geology and soils impacts do not typically combine such that a larger geographic context would be involved. Depending on subsurface conditions, slopes, and other factors, each cumulative project would require different levels of grading, cut-and-fill, and excavation. In addition, each cumulative project would be required to comply with the General Plan, Town Code, Proposed Project, and California Building Standards Code requirements. The standards presented in these documents require that a site-specific geotechnical investigation be prepared which would include design recommendations to reduce each cumulative project's impacts. Similar seismic safety standards would apply to the cumulative projects. For these reasons, project building under the Proposed Project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a significant cumulative impact on geology and soils. Therefore, no significant cumulative impact exists in the geographic context for geology, soils, and seismicity.

GREENHOUSE GAS EMISSIONS

By their nature, the greenhouse gas emissions impacts analyzed in Chapter 3 represent a cumulative analysis, because the effects specific to the Proposed Project cannot reasonably be differentiated from the broader effects of regional growth and development. Thus, analyses for these topics reflect not just growth in the Planning Area, but growth elsewhere in the region as well. Please see Section 3.5 for a discussion of cumulative impacts associated with GHG emissions.

NOISE

The cumulative geographic context for noise and vibration is the Planning Area and the immediate vicinity. The noise analysis represents cumulative analyses of issues through the Proposed Project because it combines the anticipated effects of the Proposed Project with anticipated effects of growth and development within the Town and the Bay Area region through 2031. By its nature, the noise analysis represents a cumulative analysis, because it accounts for the contribution that townwide and regional growth will make to the noise environment within the Planning Area through modeling that factors in road and construction traffic generated from projects throughout the wider region. Consequently, the impact significance conclusions discussed in Section 3.6 are representative of cumulative impacts.

The Proposed Project would result in both short-term and long-term changes to the existing noise environment in the Planning Area. Construction activities, including traffic, demolition, and reconstruction, would generate ambient and groundborne noise. However, there are a variety of policies, codes, and regulations in place to prevent substantially adverse impacts, particularly to sensitive land uses. The Town of Woodside General Plan policies and Woodside Municipal Code Sections 151.55.B (construction hours) and 151.55.D (amplified noise restrictions) establish noise/land use compatibility standards and restrictions. In addition, implementation of Mitigation Measure N-1 is recommended, which would require best management practices that reduce noise impacts of larger construction projects to a less than significant level in accordance with General Plan standards. All new construction would also be required to comply with noise restrictions which regulate the time and intensity of construction in the Woodside Town Code as well as requirements from the California Building Code and CalGreen Code.

Together, these policies, regulations, and noise level restrictions would ensure that cumulative adverse noise and vibration impacts associated with construction be attenuated to a less than significant impact. The Proposed Project would result in no impact from airport noise, and therefore, its impact on noise and vibration would result in a less than cumulatively considerable impact.

TRANSPORTATION

The geographic context for cumulative impacts related to transportation is the roadway network within the Planning Area and the regional roadway network with connections to the Planning Area. Buildout of the Proposed Project would result in increased development in the Planning Area and would generate additional vehicle trips on the local and regional roadway network. The Town of Woodside General Plan includes policies that seek to improve mode share and reduce the impact of new traffic on alternative transportation modes. Development under the Proposed Project would

be consistent with such policies and regulations by increasing housing opportunities primarily in infill areas which is an integral part of VMT reduction and encouraging transportation alternatives, such as walking and biking. However, as outlined in Section 3.7, even with Mitigation Measures TRANS-1 and TRANS-2, estimated TDM measures and associated VMT reductions to these units would reduce Project-generated home-based VMT per resident, but such reductions would remain above the threshold of significance. Given that the Town will not achieve the overall VMT threshold reduction level, impacts would be cumulatively considerable.

TRIBAL CULTURAL RESOURCES

The cumulative geographic context for tribal cultural resources is the Town of Woodside and the immediate vicinity. If the Proposed Project, in combination with other past, present, and reasonably foreseeable projects in Woodside, would result in the loss of or adverse changes to multiple cultural resources a significant cumulative impact could result.

There are known prehistoric and historic archaeological resources in and around the Town of Woodside. The Planning Area has a high potential for encountering deposits associated with known resources or as-yet undocumented resources. Anticipated development projects under the Proposed Project may involve grading, excavation, or other ground-disturbing activities, which could have a cumulative impact on unknown archaeological resources. Mitigation Measure CUL-1 would ensure that developers in the Planning Area receive cultural resources awareness training and halt work if cultural resources are encountered. Further, any adverse effects to archaeological resources shall be mitigated as specified by PRC Section 21083.2. Thus, compliance with mitigation measures and General Plan policies, as well as applicable local, State, and federal laws, would ensure that the Proposed Project's contribution to this impact would not be cumulatively considerable.

All development projects allowed under the Proposed Project would be required to comply with State laws pertaining to the discovery of human remains and disposition of Native American burials; therefore, the Proposed Project would result in a less than cumulatively considerable contribution to impacts related to human burials.

There are known Native American tribal cultural resources within the Planning Area, and development projects allowed under the Proposed Project may result in the identification of unrecorded tribal cultural resources given the historic occupation of the area. Future projects that would not otherwise qualify for an exemption under CEQA would be required to comply with the provisions of AB 52 to incorporate tribal consultation into the CEQA process. Therefore, the Proposed Project's contribution to this impact would not be cumulatively considerable.

UTILITIES AND SERVICE SYSTEMS

Future development anticipated by the Proposed Project would generate additional demand for water and wastewater, stormwater, solid waste services, power, and telecommunications services.

This evaluation focuses on impacts on the water treatment and distribution systems. Water to the Planning Area is supplied by both California Water Service (Cal Water) and Redwood City. The cumulative geographic context for water supply impacts is the Cal Water and Redwood City service areas. As noted in the Initial Study, in 2021, both Cal Water and Redwood City, respectively, prepared separate Urban Water Management Plans (UWMP) to ensure that sufficient water

supplies are available to meet existing and future water needs, and that steps are in place should a critical water shortage occur. Cal Water prepared a UWMP for the Bear Gulch area specifically, while Redwood City prepared a UWMP for their service area, which includes parts of Woodside. Both UWMPs accounted for ABAG projections of population, housing, and employment through 2040. As such implementation of the Proposed Project would not require the construction or expansion of treatment facilities over and above that which is already planned to serve demand in the service area through 2040. Therefore, the Proposed Project's contribution to this potentially significant cumulative impact is less than cumulatively considerable.

With regards to wastewater treatment and distribution, the two public sanitary sewer districts, the County of San Mateo Fair Oaks District, and Woodside's Town Center Sewer District, serve the Town of Woodside. The cumulative geographic context for wastewater impacts is the County of San Mateo Fair Oaks District and Woodside's Town Center Sewer District service areas. The total contractual capacity for the Fair Oaks District within Woodside and the Town Center Sewer District is 250,000 gallons per day. As such, the districts are currently operating at 44 percent of their total capacity. The Proposed Project represents a relatively small increase with respect to the total available capacity. Therefore, the Proposed Project's contribution to cumulative impacts is less than cumulatively considerable.

Because the Town of Woodside provides stormwater and flood management within its borders, and owns and operates the stormwater drainage system, these systems are largely isolated from the rest of the region. Thus, the impacts on stormwater facilities are not cumulative in nature, and are less than cumulatively considerable.

The cumulative geographic context for power and telecommunications is the PG&E service area. Existing overhead and underground electrical lines extend throughout the Planning Area and were originally installed to serve a variety of existing land uses. Given that implementation of the Proposed Project would not significantly change the general types of land uses located within the Planning Area, the existing electricity infrastructure would be sufficient to serve new development. PG&E is expected to be able to meet overall demand for electricity and natural gas for all its customers, including San Mateo County, in the future. PG&E will continue to maintain and upgrade its electrical and natural gas distribution systems as needed based on future demand trends. For electricity, this includes local and regional distribution lines, undergrounding or poles where needed, and transformer stations. For natural gas, this includes local and regional pipelines and transmission stations. Therefore, the impact of the Proposed Project on power infrastructure would not be cumulatively considerable.

WILDFIRE

The cumulative geographic context for wildfire consists of sites within the Planning Area and nearby properties in the immediate vicinity. The Proposed Project would generate an increase in daily trips as detailed in Chapter 3.7 of this EIR, which may have an impact on emergency access and may conflict with the County's and Town's adopted emergency response and evacuation plans. However, any development must be constructed in accordance with federal, state, regional, and local requirements, which are intended to ensure the safety of residents and structures to the extent feasible. Compliance with these standard regulations would be consistent with the County's Emergency Operations Plan and the Town of Woodside Evacuation Plan. Further, development must adhere to the Town of Woodside General Plan Natural Hazards and Safety Element which include policies associated with wildfire risk and evacuation. Thus, implementation of the Proposed

Project would not impair an emergency response or emergency evacuation plan and there would be no cumulatively considerable impact.

Further, while the projected population in the Planning Area would increase the number of people potentially exposed to impacts from wildfire, the Proposed Project would not induce substantial unplanned population growth in the Planning Area. New development would be subject to the California Fire Code, which includes safety measures to minimize the threat of fire. Construction would also be required to meet CBC requirements, including CCR Title 24, Part 2, which includes specific requirements related to exterior wildfire exposure. The Board of Forestry, via CCR Title 14, sets forth the minimum development standards for emergency access, fuel modification, setback, signage, and water supply, which help prevent loss of structures or life by reducing wildfire hazards. The codes and regulations would reduce the risk of loss, injury, or death from wildfire for new developments under the Proposed Project.

Local codes also serve to reduce wildfire risk. Chapter 150.01 of the Town Code adopts the California Building Code (CBC) and contains all fire safety standards that development must adhere to in the Town. The chapter exceeds State requirements as well, including further specifying materials and construction methods for exterior wildfire exposure, roofing requirements, and requirements for automatic fire-extinguisher systems. Such codes describe ways to minimize and mitigate potential for loss from wildfire exposure.

Therefore, compliance with local and State regulations and plans pertaining to wildfire would help reduce impacts regionally; the Proposed Project's contribution to wildfire risks is not considered cumulatively considerable.

5.3 Significant and Unavoidable Impacts

Significant unavoidable impacts are those that cannot be mitigated to a level that is less than significant. According to CEQA Guidelines 15126.2(b), an EIR must discuss any significant environmental impacts that cannot be avoided under full implementation of the proposed program, including those that can be mitigated, but not to a less-than-significant level. The analysis in Chapter 3 determined that the Proposed Project would result in significant impacts related to transportation and greenhouse gas emissions, and that, even with implementation of mitigation measures, the impact would remain significant and unavoidable. These impacts are summarized below:

TRANSPORTATION

As detailed in Chapter 3.7, the Cumulative Scenario with the Proposed Project would generate daily home-based VMT per resident of 24.8, which represents a reduction of 4.6 percent from the baseline Town average of 26.0. Project generated home-based VMT per resident of 24.8 would be higher than the threshold of significance (22.1), and hence indicate that the Project would result in a potentially significant transportation impact requiring mitigation. As such, TDM measures are applied in Mitigation Measures TRANS-1 and TRANS-2 with estimated VMT reductions per resident from 24.8 to 24.1, which remains above the threshold of significance (22.1). Due to the inability to determine that overall Project home-based residential VMT per capita can be reduced

below the threshold of significance despite implementation of VMT reduction measures, the Project transportation-related impact is considered significant and unavoidable with mitigation.

GREENHOUSE GAS EMISSIONS

As discussed in Chapter 3.7, CARB recommends an efficiency metric of no more than 6.0 MTCO₂e per capita by 2030 and 2.0 MTCO₂e per capita by 2050. As seen in Table 3.5-4, future conditions under the Proposed Project in 2031 would result in 4.01 MTCO₂e per capita per year, which is below the 2030 threshold but still exceeds the 2050 threshold. Given that the Proposed Project would still not meet the State's goals to achieve carbon neutrality by 2045, the Proposed Project would have a significant and unavoidable impact on the generation of greenhouse gas emissions.

Further, the Proposed Project would not achieve the 15 percent VMT per capita reduction target under buildout conditions. Due to the inability to determine that overall Project home-based residential VMT per capita can be reduced below the threshold of significance despite implementation of VMT reduction measures, the Project transportation-related impact is considered significant and unavoidable with mitigation. Therefore, the Proposed Project's mobile-source GHG emissions would conflict with SB 743 and the statewide GHG target for 2030 established by SB 32. Overall, the Proposed Project would be consistent with policies and plans that encourage reduction in GHG emissions from passenger vehicles, energy conservation, energy efficiency, and sustainability. However, GHG emissions from mobile sources would still conflict with the threshold of reduction consistent with SB 743, therefore, the Proposed Project would have a significant and unavoidable impact with respect to conflicts with an applicable plan, policy, or regulation.

5.4 Significant Irreversible Environmental Changes

CEQA Guidelines require an EIR to consider whether "uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely" (CEQA Guidelines Section 15126.2(d)). "Nonrenewable resources" refers to the physical features of the natural environment, such as land or waterways, and resources that are renewable only over long time spans, such as soil productivity. A resource commitment is considered irretrievable when the use or consumption of the resource is neither renewable nor recoverable for use by future generations. Irreversible changes and irretrievable commitments of non-renewable resources anticipated by the Proposed Project include the following two types of resources: (1) general industrial resources including fuels and construction materials; and (2) project-specific resources such as land, biotic, and cultural resources at the building sites.

COMMITMENT/CONSUMPTION OF NON-RENEWABLE RESOURCES

Implementation of the Proposed Project could result in the long-term commitment of various resources to urban development. While the Proposed Project itself would not directly entitle or result in any new development, it is reasonably foreseeable that the Proposed Project, which acts as a blueprint for growth and development in the Planning Area over the next eight years, could result

in significant irreversible impacts related to the commitment of non-renewable and/or slowly renewable natural and energy resources, such as:

- **Air Quality:** Increases in vehicle trips resulting from buildout of the Proposed Project would potentially contribute to long-term degradation of air quality and atmospheric conditions in the region. Technological improvements in automobiles, including the growth of the electric vehicle market share, may lower the rate of air quality degradation in the coming decades. Nonetheless, vehicle trips resulting from implementation of the Proposed Project could result in the irreversible consumption of nonrenewable energy resources, primarily in the form of fossil fuels, natural gas, and gasoline for non-electric automobiles and long-term degradation of air quality.
- **Water Consumption:** To the extent that the Proposed Project would accommodate new population, it would increase the demand for water and place a greater burden on water supply. While additional residents and workers would use more water, the Town is expected to have adequate water to meet demand in normal and wet years through 2040. Despite the change in demand resulting from the Proposed Project being marginal, the increase would represent an irreversible environmental change, as use of this resource would increase.
- **Energy Sources:** Residential developments use electricity, natural gas, and petroleum products for lighting, heating, and other indoor and outdoor power demands, while automobiles use both oil and gas. New development anticipated by the Proposed Project would result in increased energy use for the operation of new buildings and for transportation. This new development would therefore result in an overall increased use of both renewable and nonrenewable energy resources. To the extent that new development uses more nonrenewable energy sources, this would represent an irreversible environmental change.

CONSTRUCTION-RELATED COMMITMENTS

Irreversible environmental changes could also occur during the course of constructing development projects anticipated by the Proposed Project. New construction would result in the consumption of building materials (such as lumber, sand and gravel), natural gas, and electricity, water, and petroleum products to process, transport and build with these materials. Though it is possible for construction equipment to be fueled by renewable sources over the course of the Proposed Project buildout, the timing and availability of these energy sources is unknown. Construction equipment running on fossil fuels would be needed for excavation and the shipping of building materials. Due to the non-renewable or slowly renewable nature of these resources, this represents an irretrievable commitment of resources.

However, development allowed under the Proposed Project would not necessarily result in the inefficient or wasteful use of resources. Compliance with all applicable building codes would ensure that natural resources are conserved to the maximum extent feasible. It is possible that new technologies or systems will emerge, or become more cost-effective or user-friendly, to further reduce the reliance upon non-renewable natural resources. Nonetheless, future activities related to implementation of the Proposed Project could result in the irretrievable commitment of nonrenewable energy resources, primarily in the form of fossil fuels (including fuel oil), natural gas, and gasoline for automobiles and construction equipment.

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