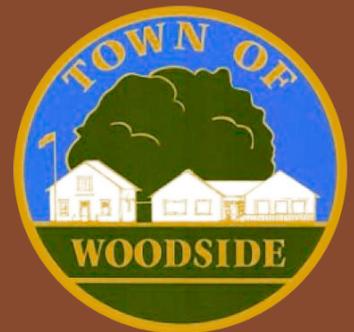




Town of Woodside Housing Element Update Final Environmental Impact Report

SCH# 2023050549

June 24, 2024



Town of Woodside Housing Element Update Final Environmental Impact Report

June 24, 2024

Prepared for the Town of Woodside

Prepared by

DYETT & BHATIA
Urban and Regional Planners

In association with:

Salter
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I Introduction

In accordance with the California Environmental Quality Act (CEQA), this document provides responses to comments received on the Draft Environmental Impact Report (Draft EIR) SCH No. 2023050549 for the proposed Town of Woodside 2023-2031 General Plan Housing Element Update (Proposed Project) in the Town of Woodside, California, and it includes revisions to the text in the Draft EIR made in response to comments. The Draft EIR identified significant impacts associated with the Proposed Project and examined alternatives and recommended mitigation measures that could avoid or reduce potential impacts.

This document will constitute the Final EIR if the Town Council certifies it as adequate and complete under CEQA.

Purpose

As described in Sections 15089 and 15132 of the State CEQA Guidelines, the lead agency must prepare a Final EIR before approving a project. The purpose of a Final EIR is to provide an opportunity for the lead agency to respond to comments made by the public and agencies. Pursuant to CEQA Guidelines Section 15132, a Final EIR must contain the following:

- The Draft EIR or a revision of the Draft;
- A list of persons, organizations, and public agencies commenting on the Draft EIR;
- Comments and recommendations received on the Draft EIR;
- The response of the Lead Agency to significant environmental points raised in the review process; and
- Any other information added by the Lead Agency.

The EIR is intended to disclose to the Town of Woodside decision makers, responsible agencies, organizations, and the general public the potential impacts of implementing the Proposed Project using a program level of analysis. This Final EIR amends and incorporates by reference the Draft EIR, which is bound separately. As required under CEQA, this document includes comments and responses to comments on the Draft EIR, and minor corrections and clarifications to the Draft EIR.

The Final EIR and the Draft EIR are available for review at: <https://www.woodsideca.gov/379/California-Environmental-Quality-Act-CEQ>.

CEQA Process

The Town of Woodside is the lead agency for this EIR. According to CEQA, lead agencies are required to consult with public agencies having jurisdiction over a Proposed Project, and to provide the general public with an opportunity to comment on the Draft EIR. The Draft EIR was made available for a 45-day public review period that ran from May 3 through June 17, 2024. The Draft EIR was distributed to local and State responsible and trustee agencies and the general public was advised of the availability of the Draft EIR through public notice published in the local newspaper and on the Town's website and the project website as required by law.

Copies of all written comments received on the Draft EIR are contained in this document. These comments and responses to these comments are included in Chapter 2 of this Final EIR.

Organization

This document contains the following components:

- **Chapter 1 Introduction.** This chapter discusses the use and organization of the Final EIR.
- **Chapter 2 Public Comments and Responses.** Lists all of the agencies, organizations, and individuals that submitted written comments on the Draft EIR and reproduces all comments. Provides responses to comments on the Draft EIR as well as revisions to the Draft EIR where necessary to clarify or amplify in the order that responses appear. Where such revisions are warranted in response to comments on the Draft EIR, deletions are shown in ~~striketrough~~ and additions are shown underlined in red in the matrix of comments and responses.
- **Chapter 3 Revisions to the Draft EIR.** Provides errata with revisions to the Draft EIR where necessary to clarify or amplify. Revisions are organized by Draft EIR section and by page number. Where such revisions are warranted in response to comments on the Draft EIR, deletions are shown in ~~striketrough~~ and additions are shown underlined in red in the matrix of comments and responses.

2 Public Comments and Responses

This chapter contains copies of the comment letters received on the Draft EIR during the public comment period, which began on May 3, 2024 and ended on June 17, 2024, as well as responses to comments that pertain to environmental issues and the merits of the analysis in the Draft EIR.

2.1 Comments Received

There were 14 comment letters received during the comment period. These contained 189 unique comments. Comment letters are organized into two categories and presented in alphabetical order within each category: Public Agency comments (section A) and Individual comments (section B).

Each letter or summary is identified by a designator (e.g. “Letter A1”). Specific comments within each letter or summary are identified by a designator in the page margin that reflects the sequence of the specific comment within the correspondence (e.g. “A1-1” for the first comment in Letter A1).

Comment letters received are listed in **Table 2-1**.

Table 2-1: Comments Received on the Draft EIR

Comment Letter	Date	Commenter
Agencies (A)		
A1	6/13/2024	California Department of Fish & Wildlife (CDFW)
A2	6/17/2024	California Department Transportation (Caltrans)
Individuals (B)		
B1	5/6/2024	Donaldson, Toni
B2	6/17/2024	Goeld, Paul
B3	6/16/2024	Hansen, Kim
B4	6/17/2024	Hansen, Kim
B5	6/17/2024	Huhs, John and Renee
B6	6/16/2024	Lubin, Steve
B7	6/17/2024	Mah, Maggie
B8	6/17/2024	Offen, Karen
B9	6/17/2024	Poletti, Sue

Final Environmental Impact Report for the Woodside Housing Element Update
Chapter 2: Public Comments and Responses

Comment Letter	Date	Commenter
B10	6/16/2024	Romano, Christina
B11	6/17/2024	Thomsen, Stephan
B12	6/17/2024	Alftin, Jenine



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Bay Delta Region
2825 Cordelia Road, Suite 100
Fairfield, CA 94534
(707) 428-2002
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



June 13, 2024

Sage Schaan, Planning Director
Town of Woodside
2955 Woodside Road
Woodside, CA 94062
SSchaan@woodsideca.gov

Subject: Town of Woodside Housing Element Update, Draft Environmental Impact Report, SCH No. 2023050549, Town of Woodside, San Mateo County

Dear Mr. Schaan:

The California Department of Fish and Wildlife (CDFW) has reviewed the Town of Woodside (Town) Draft Environmental Impact Report (EIR) for the Town of Woodside Housing Element Update (Project) pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect fish and wildlife resources of the State. Please be advised, by law, CDFW may be required to carry out or approve aspects of the Project through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California’s **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802). For purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority over the Project pursuant to the Fish and Game Code. For example, the Project may be subject to CDFW’s Lake and Streambed

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The “CEQA Guidelines” are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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Alteration (LSA) regulatory authority, if the Project impacts the bed, channel or bank of any river, stream or lake within the State (Fish & G. Code, § 1600 et seq.). Likewise, to the extent the Project may result in “take” as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

A1-1

REGULATORY REQUIREMENTS

California Endangered Species Act

A CESA Incidental Take Permit (ITP) must be obtained from CDFW if the Project has the potential to result in “take” of plants or animals listed under CESA, either during construction or over the life of the Project. Under CESA, “take” means “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill.” (Fish & G. Code, § 86). CDFW’s issuance of an ITP is subject to CEQA and to facilitate permit issuance, any project modifications and mitigation measures must be incorporated into the CEQA document analysis, discussion, and mitigation monitoring and reporting program. If the Project will impact CESA listed species, early consultation is encouraged, as significant modification to the Project and mitigation measures may be required in order to obtain a CESA Permit.

A1-2

CEQA requires a mandatory finding of significance if a project is likely to substantially impact threatened or endangered species. Pub. Resources Code, §§ 21001, subd. (c) & 21083; CEQA Guidelines, §§ 15380, 15064 & 15065.) In addition, pursuant to CEQA, the Lead Agency cannot approve a project unless all impacts to the environment are avoided or mitigated to less-than-significant levels, or the Lead Agency makes and supports Findings of Overriding Consideration (FOC) for impacts that remain significant despite the implementation of all feasible mitigation. FOC under CEQA, however, do not eliminate the Project proponent’s obligation to comply with the Fish and Game Code.

Lake and Streambed Alteration

CDFW requires an LSA Notification, pursuant to Fish and Game Code section 1600 et seq., for Project activities affecting river, lakes or streams and associated riparian habitat. **The draft EIR identifies that the Project location contains stream corridors, floodplains, and riparian habitat that could be impacted by the Project (p. 3.3-7).** Notification is required for any activity that may substantially divert or obstruct the natural flow; change or use material from the bed, channel, or bank (including associated riparian or wetland resources); or deposit or dispose of material where it may pass into a river, lake, or stream. Work within ephemeral streams, drainage ditches, washes, watercourses with a subsurface flow, and floodplains is generally subject to notification requirements. In addition, infrastructure installed beneath such

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aquatic features, such as through hydraulic directional drilling, is also generally subject to notification requirements. Therefore, any impact to the mainstems, tributaries, or floodplains or associated riparian habitat caused by the proposed Project will likely require an LSA Notification. CDFW may not execute a final LSA Agreement until it has considered the final EIR and complied with its responsibilities as a responsible agency under CEQA.

Migratory Birds and Raptors

CDFW has authority over actions that may result in the disturbance or destruction of active bird nest sites or the unauthorized take of birds. Fish and Game Code sections protecting birds, their eggs, and nests include section 3503 (regarding unlawful take, possession, or needless destruction of the nests or eggs of any bird), section 3503.5 (regarding the take, possession, or destruction of any birds-of-prey or their nests or eggs), and section 3513 (regarding unlawful take of any migratory nongame bird). Migratory birds are also protected under the federal Migratory Bird Treaty Act.

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PROJECT DESCRIPTION AND LOCATION SUMMARY

Proponent: Town of Woodside

Objective: The objective of the Project is to amend the Town’s General Plan Housing Element to demonstrate the capacity to permit “...up to 423 new housing units...” in the Town to comply with state law (draft EIR 2024, p. ES-3). The Project proposes to promote the development of a variety of residential housing types, specifically to focus on “smaller scale infill development” within mostly existing residential neighborhoods, including some higher density multifamily type housing and accessory dwelling units (ADUs) (draft EIR 2024, E-3). The infill alternative proposes a focus on new higher density housing including 29 multifamily type housing units at the Town Center area and 15 at the Skylonda Center area for a total of 303 new units. Additionally, the Project proposes the infill alternative option will result in 120 new ADU type housing units (draft EIR 2024).

Location: Town of Woodside, townwide

Timeframe: 2023-2031

A1-5

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the Town in adequately identifying and/or mitigating the Project’s significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Based on the Project’s avoidance of significant impacts on biological resources with

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implementation of mitigation measures, including those recommended by CDFW below, CDFW concludes that a Program EIR is appropriate for the Project.

COMMENT 1: Mitigation Measures

Issue, specific impacts, why they may occur and be potentially significant:

The draft EIR does not provide a mitigation checklist or procedure for evaluating subsequent Project impacts. Therefore, it is unclear if implementation of MM-BIO-1 through MM-BIO-10 would reduce impacts to less-than-significant or if subsequent environmental review would be required. The draft EIR found that at least 36 special-status species have the potential to occur in the Planning Area (Tables 3.3-1 and 3.3-2, pp.3.3-3 - 3.3-4), that “a range of special-status species have been documented in and around the Planning Area” (p. 3.3-16), and “...given the extent of biological resources that exist in the Planning Area, the potential for impacts to some particular special-status species remains” (p. 3.3-18). The draft EIR identifies that development facilitated by the Project could have a substantial adverse effect, either directly or through habitat modifications, on candidate, sensitive, or special-status species. The draft EIR acknowledges that significant impacts both direct and indirect may result in significant impacts, “take”, and/or habitat degradation (p. 3.3-18). To address the foreseeable potential impacts to less-than-significant, the draft EIR states that the “Mitigation Measures” (MM-BIO-1 – MM-BIO-10) will reduce potential impacts to fish, wildlife, and sensitive and critical habitats (p. 3.3-18).

Recommendations to reduce impacts to less-than-significant: The draft EIR should include a mitigation checklist and procedure for evaluating subsequent Project impacts. The procedure should include an evaluation of habitat and species occurrences based on a current habitat assessment and species data. The procedure should also include consultation with CDFW when threatened, endangered or fully protected species are present or have the potential to be present.

COMMENT 2: Roosting Bats

Issue: Mitigation Measure BIO-4 (Disturbance to Bat Species) allows deferred and undefined mitigation measures. The measure does not include post-construction/post-development monitoring to ensure mitigation was adequate and successful. The draft EIR states: “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...” (p. 3.3-21).

There are 25 known bat species in California, such as the little brown bat (*Myotis lucifugus*), the Mexican free-tailed bat (*Tadarida brasiliensis*), the hoary bat (*Lasiurus cinereus*), and California’s state bat the pallid bat (*Antrozous pallidus*), a CDFW species

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of special concern (CDFW 2024, SSC). Bat maternity season varies across species, location, regional climate, and weather patterns, therefore defining maternity roosting season as April 1 – August 31 and requiring surveys only during this timeframe may be inadequate to identify bat maternity roosting sites present in a proposed development area (Caltrans Bat Mitigation 2019).

Recommendations to reduce impacts to less-than-significant: CDFW recommends the draft EIR require a developer to use a qualified biologist² to survey (year round) all proposed development areas for evidence of bat roosts where there is suitable habitat present within 200 feet of the disturbance area, including: culverts, snags, attics, warehouses, outbuildings, barns, siding or roofs of houses and other buildings, bridges, parking garages, woodpiles, trees, bat houses, caves, mines, talus, and cliff and rock crevices.

Recommended Mitigation Measure BIO-4B (Bat Protection): If surveys identify a bat maternity roost or potential bat maternity roost that cannot be avoided then a bat maternity roost mitigation plan shall be developed prior to removal of roosts habitat. The plan shall, at a minimum: 1) Require a maternity roost replacement ratio of 2:1; 2) Success criteria based on roost occupancy; 3) A five-year post-development monitoring program. The post-development monitoring program should include the following elements contained in the Caltrans Bat Mitigation 2019, <https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/caltrans-bat-mitigation-guide-a11y.pdf>.

- Quantification of the average number of bats present by species and season;
- Comparison of replacement habitat within a structure if placement varies, or if more than one habitat type, such as hanging boxes, is provided; and
- Long-term temperature monitoring from a subsample of replacement habitat features with temperature data loggers. Wireless data loggers can be used to limit the disturbance to roosting bats” (p. 7-20).

COMMENT 3: Bumble Bees

Issue: Mitigation Measure BIO-5 (Disturbance to Bumble Bee Species) is inadequate to reduce potential direct and indirect impacts to candidate bumble bee

² A qualified biologist is an individual who has a combination of education and experience that demonstrates 1) they have knowledge and experience in the biology and natural history of local fish and wildlife resources present at the Project site; 2) have experience identifying, capturing, handling, and relocating the fish and/or wildlife species; 3) be familiar with relevant survey protocols and recent scientific literature; and 4) be knowledgeable of state and federal laws regarding the protection of sensitive species.

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species to less-than-significant. Mitigation Measure BIO-5 states that the Project proponent “shall conduct a take avoidance survey for active special-status bumble bee [such as Crotch’s bumble bee (*Bombus crotchii*)] colony nesting sites in any previously **undisturbed** [emphasis CDFW] area[s]...” (3.3-21). Solely conducting surveys for bumble bee nests and restricting avoidance surveys to “undisturbed” areas is too narrow a condition to reduce potential direct and indirect impacts to candidate bumble bee species to less-than-significant. Additionally, Crotch’s bumble bee is currently a Candidate Endangered species under CESA and as a candidate species, unauthorized take of this species pursuant to CESA is a violation of California Fish and Game Code section 2080 et seq.

Recommended Potentially Feasible Mitigation Measures to reduce impacts to less-than-significant or to minimize significant impacts:

CDFW recommends including the following mitigation measures for Crotch’s bumble bee:

Mitigation Measure #1: Habitat Assessment: A habitat assessment shall be conducted prior to subsequent project construction.

The habitat assessment should be conducted by a qualified entomologist knowledgeable with the life history and ecological requirements of Crotch’s bumble bee. The habitat assessment should include all suitable nesting, overwintering, and foraging habitats within the Project area and surrounding areas. Potential nest habitat (February through October) could include that of other *Bombus* species such as bare ground, thatched grasses, abandoned rodent burrows or bird nests, brush piles, rock piles, and fallen logs. Overwintering habitat (November through January) could include that of other *Bombus* species such as soft and disturbed soil or under leaf litter or other debris. The habitat assessment should be conducted during peak bloom period for floral resources on which Crotch’s bumble bee feed. Further guidance on habitat surveys can be found within Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species (<https://wildlife.ca.gov/Conservation/CESA>).

Mitigation Measure #2: Survey Plan: If Crotch’s bumble bee habitat is present within the Project area, the subsequent project shall include a pre-construction survey plan. The survey plan should be submitted to CDFW for review. Surveys should be conducted by a qualified entomologist familiar with the behavior and life history of Crotch’s bumble bee. If CESA candidate bumble bees will be captured or handled, surveyors should obtain a 2081(a) Memorandum of Understanding (MOU) from CDFW.

Surveys shall be conducted during the colony active period (i.e. April through August) and when floral resources are in peak bloom. Bumble bees move nests sites each year, therefore, surveys should be conducted each year that Project work activities will occur.

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Further guidance on presence surveys can be found within Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species (<https://wildlife.ca.gov/Conservation/CESA>).

Mitigation Measure #3: Crotch's Bumble Bee Avoidance or Take Authorization: If Crotch's bumble bee are detected during pre-construction surveys, a Crotch's bumble bee avoidance plan shall be developed and provided to CDFW for review prior to work activities involving ground disturbance or vegetation removal.

If full take avoidance is not feasible, the subsequent project shall apply to CDFW for take authorization under an ITP.

COMMENT 4: Amphibians

Issue: Foothill yellow-legged frog population 4 (*Rana boylei* pop 4) has the potential to occur within the Project area and is an Endangered species under CESA. Unauthorized take of this species pursuant to CESA is a violation of California Fish and Game Code section 2080 et seq.

Recommendations to reduce impacts to less-than-significant: Update Mitigation Measure BIO-6 to include a provision that if Foothill yellow-legged frog cannot be avoided then a CESA ITP shall be obtained by the subsequent project prior to take occurring.

COMMENT 5: Special-status Small Mammals

Mitigation Measure BIO-10 (Disturbance to Santa Cruz Kangaroo Rat and San Francisco Dusky-Footed Woodrat) states a preconstruction survey will be conducted "...within 30 days of the start of work activities." As proposed, the preconstruction survey may not detect individuals and nests within the disturbance zone. Establishment of 10-foot buffers may not be sufficient to reduce impacts to less-than-significant.

Recommendations to reduce impacts to less-than-significant: The draft EIR should update preconstruction survey measure(s) for San Francisco dusky-footed woodrat (*Neotoma fuscipes annectens*) midden and Santa Cruz kangaroo rat (*Dipodomys venustus venustus*) nests to identify surveys will be conducted within the Project footprint and a 50-foot buffer of the Project. Surveys should be conducted by a qualified biologist at least two weeks prior to the start of any ground-disturbing activities. In the event a San Francisco dusky-footed woodrat midden or Santa Cruz kangaroo rat nest is found in the proposed development area, the developer/Project proponent shall submit results of surveys to CDFW. Surveys results shall include locations of any detected middens or nests, sighted individuals or carcasses on a base map or maps. Maps shall include aerial imagery of the work site, predicted disturbed areas and protective buffer

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distances. The map or maps shall use an appropriate scale to depict an individual midden and/or nest sites.

COMMENT 6: Fully Protected Species: San Fransico Garter Snake

Issue: San Francisco garter snake (*Thamnophis sirtalis tetrataenia*) has potential to occur within the Project area and is a state fully protected species. CDFW has jurisdiction over fully protected species of birds, mammals, amphibians, reptiles, and fish pursuant to Fish and Game Code §§ 3511, 4700, 5050, and 5515. Take of any fully protected species is prohibited. CDFW cannot authorize incidental take of fully protected species unless the take is for scientific purposes pursuant to Fish and Game Code Section 2081(a) or a project has an approved Natural Communities Conservation Plan pursuant to Fish and Game Code Section 2800.

Recommendations to reduce impacts to less-than-significant: CDFW recommends the draft EIR update MM-BIO-7 to include a condition avoid construction activities in all areas where a qualified biologist determines San Francisco garter snake is present.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to prepare subsequent CEQA documents or to make supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (d) & (e)). Accordingly, please report any special-status species and natural communities detected during Project surveys to the CNDDDB. The CNDDDB field survey form can be filled out and submitted online here: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found here: <https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

ENVIRONMENTAL DOCUMENT FILING FEES

CDFW anticipates that the proposed Project, will have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (See: Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.).

CONCLUSION

CDFW appreciates the opportunity to comment on the draft EIR in order to assist the Town of Woodside in identifying and mitigating Project impacts on biological resources.

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Questions regarding this letter or further coordination should be directed to Jason Teichman, Environmental Scientist at 707-210-5104 or Jason.Teichman@wildlife.ca.gov; or Wesley Stokes, Senior Environmental Scientist, (Supervisory), at 707-944-5554 or Wesley.Stokes@wildlife.ca.gov.

Sincerely,

DocuSigned by:
Erin Chappell
Erin Chappell
Regional Manager
Bay Delta Region

ec: Office of Planning and Research, State Clearinghouse (SCH No. 2023050549)

REFERENCES

Caltrans Bat Mitigation: A Guide to Developing Feasible and Effective Solutions Manual, H.T. Harvey, July 2019. Available at: <https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/caltrans-bat-mitigation-guide-a11y.pdf>

California Department of Fish and Wildlife (CDFW). 2023. Survey Considerations for California Endangered Species Act (CESA), Candidate Bumble Bee Species, June 6, 2023. Available at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150&inline>

California Department of Fish and Wildlife (CDFW). 2024. Human-Wildlife Conflicts: Bats. Retrieved May 22, 2024 from <https://wildlife.ca.gov/HWC/Bats>

Town of Woodside. Housing Element Update, Environmental Impact Report, Volume 1, Public Review Draft, May 3, 2024. Prepared for the Town of Woodside, by Dyett & Bhatia Urban and Regional Planners, in association with Salter, H.T. Harvey & Associates, and Parsisi Transportation Consulting.

California Department of Transportation

DISTRICT 4
OFFICE OF REGIONAL AND COMMUNITY PLANNING
P.O. BOX 23660, MS-10D | OAKLAND, CA 94623-0660
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June 17, 2024

SCH #: 2023050549
GTS #: 04-SM-2023-00569
GTS ID: 29886
Co/Rt/Pm: SM/VAR/VAR

Sage Schaan, Planning Director
Town of Woodside
2955 Woodside Road
Woodside, CA 94062

Re: Town of Woodside Housing Element Update – Draft Environmental Impact Report (DEIR)

Dear Sage Schaan:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Town of Woodside Housing Element Update. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities. The following comments are based on our review of the May 2024 DEIR.

Please note this correspondence does not indicate an official position by Caltrans on this project and is for informational purposes only.

Project Understanding

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 8-year planning period that runs from 2023 through 2031.

Travel Demand Analysis

The project vehicle miles traveled (VMT) analysis and significance determination are undertaken in a manner consistent with the Office of Planning and Research’s (OPR) Technical Advisory. Per the DEIR, this project is found to have significant and unavoidable VMT impacts. Caltrans commends the lead agency for implementing trip reduction measures from the California Air Pollution Control Officers Association (CAPCOA) Handbook to reduce VMT.

A2-1

A2-2

The proposed mitigation measure MM-TRANS-1 should be documented with annual monitoring reports to demonstrate effectiveness.

Multimodal Transportation Planning

Please review and include the reference to the *Caltrans District 4 Pedestrian Plan* (2021) and the *Caltrans District 4 Bike Plan* (2018) in the DEIR. These two plans studied existing conditions for walking and biking along and across the State Transportation Network (STN) in the nine-county Bay Area and developed a list of location-based and prioritized needs.

Please note that any Complete Streets reference should be updated to reflect Caltrans Director's Policy 37 ([link](#)) that highlights the importance of addressing the needs of non-motorists and prioritizing space-efficient forms of mobility, while also facilitating goods movement in a manner with the least environmental and social impacts. This supersedes Deputy Directive 64-R1, and further builds upon its goals of focusing on the movement of people and goods.

To improve the multimodal transportation system and better accommodate future land use developments, please consider the following suggestions:

- Caltrans District 4 Bicycle Plan recommends shoulder improvements on State Route (SR)-84 Woodside Road beginning from the west side of Lindenbrook Road to the intersection of SR-84 La Honda Road and SR-35 Skyline Boulevard.
- Caltrans District 4 Bicycle Plan recommends improvements on the uncontrolled intersections of SR-84 La Honda Road and SR-35 Skyline Boulevard, and SR-84 Woodside Road to Canada Road.
- Please include high-visibility pedestrian crosswalks in all future restriping projects and increase the number of "YIELD TO PEDS" signs at uncontrolled intersections throughout the Town.
- Please provide both short-term bike parking and long-term secure bike parking for residents in the new proposed developments.

Integrated Transportation and Land Use Planning

Transportation and housing are integrally connected. The Housing Element Update process provides a mechanism to reflect current transportation and land use policy and adopt efficient land-use strategies such as transit-oriented, infill and mixed-use developments that can potentially reduce vehicle miles traveled and address climate change.

A2-3

A2-4

Please review and include the reference to the current California Transportation Plan (CTP) in the DEIR. CTP 2050 envisions that the majority of new housing located near existing housing, jobs, and transit, and in close proximity to one another will reduce vehicle travel and GHG emissions, and be accessible and affordable for all Californians, including disadvantaged and low-income communities. The location, density, and affordability of future housing will dictate much of our future travel patterns, and our ability to achieve the vision outlined in CTP 2050. Caltrans encourages the Town to consider and explore the potential of excess state-owned property for affordable housing development, per Executive Order N-06-19.

Equity and Public Engagement

We will achieve equity when everyone has access to what they need to thrive no matter their race, socioeconomic status, identity, where they live, or how they travel. Caltrans is committed to advancing equity and livability in all communities. We look forward to collaborating with the Town to prioritize projects that are equitable and provide meaningful benefits to historically underserved communities.

Caltrans encourages the Town to foster meaningful, equitable and ongoing public engagement in the Housing Element Update development process to ensure future transportation decisions and investments reflect community interests and values. The public engagement process should include community-sensitive and equity-focused approaches seeking out the needs of individuals from underserved, Tribal, and low-income communities, the elderly, and individuals with disabilities.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Luana Chen, Transportation Planner, via LDR-D4@dot.ca.gov. For future early coordination opportunities or project referrals, please contact LDR-D4@dot.ca.gov.

Sincerely,



YUNSHENG LUO
Branch Chief, Local Development Review
Office of Regional and Community Planning

c: State Clearinghouse

A2-5

Sage Schaan

From: Toni Donaldson <tdonaldson4@gmail.com>
Sent: Monday, May 6, 2024 3:54 PM
To: Sage Schaan
Subject: Continued Concerns on the High Road Site

Re: Continued Concerns Regarding the High Road Site for the Woodside Housing Element

- B1-1** | **Traffic**
- The area of Woodside Road and High Road is already congested, especially in the morning and mid-afternoons. There is also a very dangerous curve coming off of Woodside Road at Todo El Mundo that has been a source of concern for many years already.
- B1-2** |
- Trying to get onto Woodside Road from High Road is already a challenge for many parts of the day, especially during the school year.
 - With there only being one way in and one way out at this portion of High Road, any construction would pose a huge problem for the residents of High Road and Todo El Mundo
 - There is no public transportation for this site
- B1-3** | **Safety**
- The Woodside Road/High Road exit is one of only two ways out of Woodside Hills, the other exit being all the way up High Road. In the event of a fire, this would be death trap for people trying to get out of there.
- B1-4** |
- Has anyone confirmed the size of the large gas line running up Todo El Mundo? Make sure that the PG&E gas line is included in this review....I don't think anyone wants another San Bruno pipeline situation
- B1-5** | **Geology, soils**
- Caltrans has completed major slide remediation multiple times on Woodside Road, from High Road to Highway 280. It is still not stable.
- B1-6** | **Noise**
- There is already quite a bit of noise from Woodside Road. Adding more cars brings more noise and exhaust and bad air quality
- B1-7** | **Aesthetics**
- This site is open space now and a natural barrier from the traffic on Woodside Road. To take that away and build structures on the site, would totally change the livability of this part of Woodside.
- B1-8** | **Additional Concerns**
- I seriously have my reservations about how these sites were chosen. It might have been more effective to have the group go as a unit to each site and discuss the pros and cons of each site, rather than have them viewed or not viewed independently by those making the inclusion decision.
 - That became obvious when one of the sites was deemed open space and could not be built on, and again the fact that Woodside Hills is not even in the Woodside School District, which would probably not be viewed as very "equitable" by some.
 - It is my understanding that the new housing should not be clustered into one area....BUT if you look at the proposed sites, they are all clustered fairly close together, and well away from the town center.

- **The town center has cafes, a library, grocery store, restaurants, a church, and the elementary school that serves the Town of Woodside (other than some parts of Woodside that are in the now proposed sites (they are in the Redwood City school district).**
- **It was my understanding that a town center with all of these accommodations is exactly the type of area where the housing should be situated or at least have a site identified within this area.**

June 17, 2024

To: Sage Schaan, Planning Director
From: Paul Goeld
Subject: Comments on the Environmental Impact Report for Woodside's 6th Cycle (2023-2031) Housing Element

The comments listed below relate to the Environmental Impact Report for the Town of Woodside's 6th Cycle (2023-2031) Housing Element. I offer these comments as a private citizen.

B2-1

The Environmental Impact Report (EIR) states the primary goal of the Housing Element, namely "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." Unfortunately, the plan the town proposes will not provide the projected affordable housing and it will not be sensitive to the historic character of the Town.

On the other hand, the Infill Alternative that is presented in the EIR would result in a reduced impact and is the obvious choice that the Town should make. Having to hold an election to change town center zoning does not prevent this choice and HCD has approved Housing Elements that have relied on future elections.

B2-2

The Infill Alternative presented in the EIR only considers infill alternatives in the commercial areas of Woodside. Why not add residentially zoned areas that are close to the town center? We have done that with the Canada Road site.

Several infill opportunities exist in areas that are within easy walking distance of the town center. Using this area for an expanded ADU construction would greatly reduce the vehicle mileage impact and, importantly, integrate affordable housing into the fabric of Woodside rather than the current plans to locate them in the most distant, isolated locations of our town that are absent of the required resources (schools, recreation, transportation, shopping, etc.).

B2-3

Infill development would reduce the disruption of natural habitats by utilizing sites which have already been developed. Dismissal of infill alternatives is a major flaw in the EIR and should be corrected.

Sage Schaan

From: Kimberly Hansen <kimhansen23@yahoo.com>
Sent: Sunday, June 16, 2024 1:43 PM
To: Sage Schaan
Cc: Karen Offen PhD; Kevin Bryant
Subject: Re: Town of Woodside Draft Housing Element - eir

Thank you for this reply Sage. I have further questions, and have tried multiple times to reach you by phone, but I understand you are busy.

Please include this email in the public comments on EIR.

-I do not agree with your statement below/assessment. The draft EIR does very much address specific sites that are included in the housing element:

"The EIR analyzes a guiding document for future development (Housing Element/Zoning), but does not evaluate the specific details of specific development projects. "

-You also mention that the consultant could provide further explanation. My ask is that this draft is not accepted until the public has an opportunity to hear the explanation(s) from the consultant, as you seem to suggest.

-The CEQA/DraftEIR focuses on environmental impacts from the construction project over an estimated 2 yr timeframe. It is flawed in it does not have an estimate on the impacts to the people who will live in these projects and the neighbors. There are no noise measurements or pollutant measurements suggested or provided, as an example.

-There is also no mention of public comments during Town Council meetings or other emails sent during the Housing element discussions. It is my impression that the only comments included were from a subset of the comment periods. What comments were actually included and from what time period?

-When will TC be asked to approve this document (they should not in its current form). .?

-I ask that the majority of Town Council members read this document (100s of pages!) before deciding to approve. And if they do not have enough time, the public comment period be extended (60 instead of 45 is allowed- why pick 45?).

-We have paid over \$164,000 in 2022-23 to this consultant in 2022-2023- but there are many questions that need to be answered, such as why were the vehicle trip studies that were included conducted during the 2020 pandemic. That cannot be representative of normal vehicle trips???

-Before rezoning parcels, when will there be a discussion of the definition of the new multi-family zone requirements? I do not agree that we break w zoning precedent and define design standards based upon the project proposed. As you know better than I do, In the past, Zoning defines what you can build- setbacks, height, etc, not that the project defines the rules. I do not agree we should set up a new multi-family zone that is, essentially: we will allow you to build whatever you want as long as it meets our State high density low income housing allocation. Give up local control and quality/health/safety of living for all present and future residents with this approach.

I'll send additional comments in a separate message. Did you know that the Woodside Fire Protection District does not have equipment to fight fires or save lives on structures greater than 2 stories? WFPD input is needed. You cannot agree that this EIR is good to go.

If public comment and concern is a waste of time and will not impact your action on this topic, I am greatly saddened that I've spent countless hours on this topic with the goal of supporting Woodside.

B3-1

B3-2

B3-3

B3-4

B3-5

B3-6

Sincerely, Kim

Kim

kimhansen23@yahoo.com

m 415.806.8230

On Thursday, May 30, 2024, 02:03:44 PM PDT, Sage Schaan <sschaan@woodsideca.gov> wrote:

Dear Kim,

I received your voicemail. I am off until Tuesday, but I think I forgot to change my outgoing message on the phone. I went through the Finance Department for the cost of the EIR. They have gathered the information and will email it to you.

The email below describes the use of the EIR for the Housing Element. All comments are considered by the consultant in preparation of the EIR as part of determining which categories in the CEQA Initial Study rise to the level of significance under CEQA. For example, any concerns related to health and safety, such a fire hydrant location/pressure will need to be met for each specific project before any type of construction permit is issued.

Let me know if you have any future questions. The CEQA consultant can provide a more detailed response.

Please take care.

Kindest Regards,

Sage

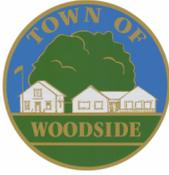
Sage Schaan, AICP CEP

Planning Director

Town of Woodside

650-530-3432

sschaan@woodsideca.gov



From: Sage Schaan
Sent: Tuesday, May 21, 2024 2:52 PM
To: Kimberly Hansen <kimhansen23@yahoo.com>
Cc: Karen Offen PhD <kmoffen@stanford.edu>; Kevin Bryant <KBryant@woodsideca.gov>
Subject: RE: Town of Woodside Draft Housing Element - eir

Dear Kim,

Thank you for the email. I broke out the answers in a list below. Please let me know if I missed any of your questions.

1. The purpose of the Housing Element EIR is to identify potential significant impacts under the CEQA for the Housing Element plan (2023 – 2031).
2. I am not sure of the question, “What other obligations does the Town have to investigate the environmental impact of building to satisfy our Housing Element?” Before final adoption of the Housing Element, the Town Council will need to adopt the Final EIR pursuant to CEQA. Please let me know if you have any follow up questions.
3. The EIR provides an analysis of the Housing Element, which outlines Programs that are necessary to comply with State law, including, but not limited to the number of projected housing units over an 8-year period. For example, the EIR includes a traffic study that identifies the existing and future Vehicles Miles Traveled (VMT) that would be created from the additional housing units projected in the Housing Element. The VMT analysis is now what is required under CEQA.
4. The comments received from the public have been considered in the preparation of the EIR. The Housing Elements is a guide to achieving the housing targets set by the State. As a CEQA document for a Townwide plan, it provides a larger context for housing development throughout the Town. Volume 2 of the EIR includes the comments from the public and the technical studies completed. All housing projects will be required to meet all health and safety regulations in place at the time of application.
5. I will ask the Finance Department to provide all invoices from the CEQA consultant to get a total cost of the Housing Element EIR to date.

As a CEQA document for a long-term plan, it provides an analysis of adding the target number of housing units over an eight-year period. It also includes the rezoning of the four sites identified in the plan for multi-family housing. All health and safety standards for all housing development must be met before any permit is issued to develop a specific site.

Please let me know if you have any specific questions about the document. I can reach out to the consultants to provide more technical answers if necessary. The Town will send out notifications Townwide of hearing dates related to the EIR, MF Zoning, and Housing Element.

I understand the frustration and really appreciate your attention to this issue. We encourage residents, and all that may be outside of Woodside, to submit comments so they can be considered as part of the public hearing review process. The deadline for comments on the EIR is 5:00 pm on June 17, 2024.

I'll get back you after checking with finance on the invoices for the EIR.

Kindest Regards,

Sage

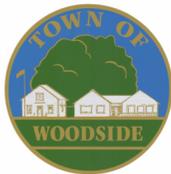
Sage Schaan, AICP CEP

Planning Director

Town of Woodside

650-530-3432

sschaan@woodsideca.gov



From: Kimberly Hansen <kimhansen23@yahoo.com>

Sent: Friday, May 17, 2024 10:48 AM

To: Sage Schaan <[SSchaan@woodsideca.gov](mailto:sschaan@woodsideca.gov)>; Kevin Bryant <KBryant@woodsideca.gov>

Cc: Karen Offen PhD <kmoffen@stanford.edu>
Subject: Town of Woodside Draft Housing Element

Hi Sage and Kevin,

What is the purpose of the posted EIR and status of other environmental analysis as part of CEQA? What other obligations does the Town have to investigate the environmental impact of building to satisfy our Housing Element?

B3-7

I started to read the consultants' EIR and became frustrated... Does it only comment on possible impact of only the construction phase of development? No analysis or data collection on the long and immediate term effects of a project in a specific location? There is no inclusion of a huge body of concerns voiced by residents, disproportionate collection and lack of collection of info from the past year, no noise data, pollution data, community/scenic character, no traffic study/data, fire authority weigh in, sewer costs and impacts, etc. Mostly blah blah blah. And while there is some mention of concern in the beginning of the document, the end of the doc summarizes the and dismisses the concerns as low. WTF?

There is no mention of the effects these, specifically the Raymundo location will have on the people living there and around there. No mitigations mentioned of quality of life or community investigation for the potential hazards involved in building in an area that is surrounded by fire, noise, pollution, transportation and segregation risks.

B3-8

Specifically, I would like to ask how much the Town paid for this report, how it will be used, has it been critiqued, and what responsibility is there to look at impacts other than just the construction phase. Is it necessary to file a public records request or can you please help me to understand this report and address this series of questions? When are the next meetings to discuss?

B3-9

Sincerely frustrated,

Kim

[Kim](#)

kimhansen23@yahoo.com
m 415.806.8230

On Thursday, May 2, 2024, 03:33:34 PM PDT, Sage Schaan <sschaan@woodsideca.gov> wrote:

Dear all,

HCD provided additional comments for Draft 3 of the Housing Element. After a meeting with HCD staff, the Town prepared Draft 4 to respond to HCD's comments.

You have received this email based on your request to be on the email list for correspondence related to the Town's Housing Element review. The revised Draft 4 of the Woodside Housing Element is posted on the Town's website. See the link below:

<https://www.woodsideca.gov/431/Draft-4-Housing-Element-for-Housing-Comm>

The 7-day public review period will run between 5-3-24 and 5-9-24, before submitting Draft 4. Any comments received by 5-9-24, will be forwarded to HCD for consideration during their review of Draft 4.

The Town continues to maintain the weblink for Draft 1, Draft 2, and Draft 3 which is referenced on the Draft 4 webpage.

Please let me know if you have any questions. You may email comments directly to me or drop off hard copies at Town Hall. If you provide hard copies, please include your email address to ensure you are included on any future email correspondence.

Kindest Regards,

Sage

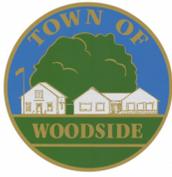
Sage Schaan, AICP CEP

Planning Director

Town of Woodside

650-530-3432

sschaan@woodsideca.gov



Comments on Environmental Impact Report (EIR) May 3, 2024 HANSEN
Spelling edits added

The spirit of housing element is to cause no harm. This report indicates that harm will be caused to people and the environment. Punishing and harming not for what we have done, but for who we are: residents in certain areas of Woodside. And we will continue to harm the residents that we will put into segregated areas on lots that are not buildable at this density.

B4-1

The Objective (Subjective) Design Standards proposed for the new multifamily zone approach is not acceptable- We will cause irreparable harm by making up standards based upon the proposed project.

Does not address/ I'm concerned that there is no internet on Raymundo
Does not address/ I'm concerned that there is no sewer pipe infrastructure on Raymundo
Were the construction impacts of new water main and new sewer pipe undergrounding of PGE lines and addition of fiber/cable internet considered in this EIR? What are the projected environmental and financial costs of the above?

B4-2

Does not address 280 noise health impact on new project residents

Does not address 280 pollution impact on new project residents

Does not require/mention sound wall mitigation

B4-3

Does not mention/I'm concerned about SF Water PUC management of adjacent high fire land- what agencies responsible?

B4-4

I'm concerned that the Raymundo site in particular will be the largest structure, and situated the shortest distance to 280 for the whole stretch of 280 from at least 380 to 85. This is indeed a negative impact to the scenic corridor and not consistent w the general plan.

B4-5

I'm concerned about how the run-off water that normally collects in the Raymundo site will be managed. Where will it be diverted? We already get storm water runoff from highway 280, that floods Runnymede road in the rainy season. Now we pave Raymundo site- what are impacts?

B4-6

Will it flood the Crystal Springs trail?

I'm concerned about no mention of the Crystal Springs Trail that is adjacent and a critical link to the park system and the impacts on the SMC Park and blocking the equestrian trail and wildlife corridor

B4-7

I'm concerned about impacts to the Crystal Springs watershed/open space area. And wildfire here.

How to create defensible space around the Raymundo site? Specifically SFPUD land to the North and West. No mention or analysis of the SFPUC high fire WUI interface and who is responsible and how to make sure to keep residents safe?

B4-8

I'm concerned about maintenance of wildlife corridors, migratory animals and how project construction and permanent fencing could impede movement.

B4-9

There needs to be Raymundo onsite parking requirement of standard 2.25 spaces per unit.

The analysis uses estimate of < 3 occupants per unit- How can that estimate be relied on? What are the sizes of the units? Where will extra cars and visitor cars park?

B4-10

Vehicle Trip VMT data study done in 2020- PANDEMIC. This data is unreliable and study needs to be repeated/improved. Potentially significant impact but mitigations are not likely to be successful unless we re-identify sites closer to town center

B4-11

Sets unacceptable precedent of rezoning open space to residential. Can we now do this for any open space? Why did you choose these locations for rezoning? There is no project application for Raymundo or High. Wait. What about the other Open Space parcels that are Town owned? Will the Town revoke its deed restrictions, risk litigation and take this land from the public?

B4-12

What if Town Council picked bad sites. What if the environmental impact is too great. Who calls them out? What does it have to take to change to an infill approach? This report lists several serious problems with the 3 Town-owned sites.

B4-13

This EIR does indeed address project specific sites and specific aspects of the sites but does not fully address impacts for these sites or future development.

I'm concerned that this document should NOT be used for the dual purpose of the short term housing element requirement and basis or fast-track streamline future projects.

This EIR is not suitable, specific or comprehensive for basis for streamlined or minimal environmental review. And should not be basis for short-cutting or ministerial review of projects.

The report does not address environmental impacts to the new residents who will live in these developments. How will our construction standards and environmental hazards effect the occupants and neighbors. Neighbors cannot get out in an emergency BTW. Does not talk about the impacts to adjacent parcels. Woodside development on lots on Jefferson/Godetia and damage to other residents shows that we need to include a holistic and larger impact view than parcel specific, currently we do development in a site-centric vacuum.

B4-14

Communication from Sage says that the EIR is not site specific, but it is.

B4-15

EIR does not include zoning plan and definition for new multifamily zone. All our current standards are for single family residents (some ADU and lot splits), but the general plan and all construction rules" need to be re-written for apartment buildings.

No discussion of the need to have geo and other analysis done before project approval and permit issuance

Ministerial (which is suggested for future multi-family projects) is an over-the-counter type approval based upon guidelines that are currently being proposed to be "propose a project, and then we will define the development the criteria" suggested approach. Current zoning standards have zone specific guidelines (setbacks building heights, % dev area, rules for slope and parking, etc)

Endangered species analysis should be required before project approval- Especially serpentine grass, small mammals and reptiles of protected status.

B4-16

How many trees will be removed Raymundo site? Will the Eucalyptus trees be removed? There are many trees on this site.

B4-17

The infill method seems to be environmentally superior, based upon this presumption-laden report. Are we to take this recommendation to proceed with this infill recommendation?

B4-18

Transportation concerns were mentioned that will result in significant impact. But why no mitigations suggested? Seems that we should scrap these 2 Town owned sites. No new businesses or commercial corridor increase in businesses is a concern

B4-19

-Woodside Town Center is the area of proposed development per recent Town Council meeting discussion. Skylonda Town Center is up on Skyline/84 (just west of where the road washed down the hill) and portions (adjacent to unincorporated SMC) is very different and the report does not make good distinction, nor has it included Skylonda area residents in this discussion. Outreach is required.

B4-20

-Skylonda 4-corners area has law enforcement challenges. What will be done to address this if development here?

<https://www.woodsidesidetown.org/DocumentCenter/View/413/Area-Plans-PDF>

-No map included to define Skylonda town center

-My recollection is that conversations regarding adding housing are in the commercial corridor surrounding Woodside Town center. No mention of this in the report.

B4-21

-Report does not do a good job addressing these 2 distinct Town Centers: their constraints and characteristics.

-High Rd property and Canada college properties will go to RWC k-8 schools, correct? Skylonda PV schools, Raymundo and Town center WES. Have schools been included in proposed impacts? And the increased vehicle trips or bus need?

B4-22

-A bus cannot turn around on Raymundo. Can a fire engine?

-Will fire engine turnarounds be required on each of these sites, specifically Raymundo? What is the evacuation plan? Get stuck and have your family, horses, animals die?

-Closest public transport (bus stop) is probably >2miles away, up a steep hill to get to bus stop. This is not pedestrian friendly and not a viable option. This is not addressed.

B4-23

What about ability to get insurance and the cost of insurance? How will these projects impact insurability and price? Will the Town and it's dev partner pass on these high insurance prices to Town residents? And what if project resident wants renter insurance?

B4-24

Realist APN search says Raymundo site is w/in 250 ft of a multiple flood zone. This is not mentioned. What are mitigations, environ impacts and costs for construction and residents?

B4-25

Specific edits/non-factual report comments:

ES2: Planning area does not have agriculture, livestock pasturing (what is that?), does have tourism and recreation as well as historic points of interest. Destination for outdoor activities to include hiking biking horse riding.

B4-26

Project primary objective is more housing units. Other objectives are secondary to this and don't seem to matter.

B4-27

ES3: Housing is as much a crisis as environmental and global warming impact “crisis”. What about the crisis that the best way to not get someone to NOT read a report is to make it too long? Aesthetics are mostly oak trees. We have no apartments and no 3 story buildings above grade.

B4-28

ES4: Evacuation from wildfire is big issue. Strategy far from robust.

B4-29

ES5 What about Town Center Commercial Corridor? Missing Middle? The infill is not at Skylonda

B4-30

ES12 How is flagging and fencing proven to help bio resources? What if bio is in the construction zone? What pre-screening is performed?

B4-31

ES13 14 Survey should be required. This needs to be part of zoning and building checklist. Before development and permit issuance.

ES16 there should be guidelines and has there been an impact study and mitigation for tree removal

B4-32

ES 19 What if water/creek/runoff is seasonal?

B4-33

ES25 Raymundo and many potential sites are in a seismic zone – mitigation for safety should be required and geo survey done before permit issuance. Same as landslide danger. What mitigations are available?

B4-34

ES 26 How is air quality for workers and for new residents in Raymundo next to 280 location? And this report is relying highly on compliance- What will Town do to enforce? Town engineer says enforcement person is already over tasked and that we rely on complaining/tattling system. What mitigation for this? How to get enforcement?

B4-35

ES27 When will climate action plan be updated? How monitor emissions? What mitigations?

B4-36

ES28 How will noise be reduced? What is cost and possibility to shield neighbors from construction noise for 2 yrs, as well as residents for the new project after construction? What will be done to enforce create staging areas? Where will that be? Raymundo High specifically.

B4-37

ES30 bus stop too far away and up hill. What mitigation? Measures listed are only for Canada college site?

ES31 there would indeed be impacts to transportation

B4-38

ES33 Construction of sewer main has not been considered. Please include and address impacts

B4-39

ES34 Infrastructure needs and evacuation wildfire etc need consideration and discussion

1-1 What is rejection mechanism and timeframe?

B4-40

Program EIRS are not good enough for future- How can this report be improved? What about a separate report?

1-4 insurance, Evacuation

B4-41

2-1 Add details about SFPUC Water wildland- map also Also add responsibility parties for future maps

B4-42

2-3 Hermit fault

B4-43

2-4 Address small sites that could have septic. Add Internet Raymundo does not have. What is the impact? Who pays?

B4-44

2-5 Add more detail re the AP Seismic Special study zone and what are the impacts to construction? Raymundo is located here. Maybe Canada too? Will we change standards? Will the setbacks in these seismic zones be ignored? Where is the map that shows the unpublished investigations? Most of this data is old- is it relevant? Do we have better data? This is important

B4-45

2-6 Where When specifically were comments submitted? Why not include Town Council Meeting comments?

B4-46

2-7 To be clear, the project objective is bullet 1, the other bullets are very much secondary and look to be subordinate and ignorable

B4-47

2-8 Where to find these appendixes? Need to add evacuation routes

B4-48

2-10 This map and color is unreadable

2-11 This page is very site specific and yet not specific enough. Why?

2-13 What is a different timeline for re-zoning? What are the zoning rules for MFRZ? When will section 153.110 be updated

B4-49

2-14 to be updated? What is this map showing? Out of date?

2-15 The Objective Design Standards on this page are unacceptable and are in violation of planning precedents and common sense. These setbacks have not been set to be consistent with the site and the environment. How many stories is a 40 ft building? Subjective Design Standards should be the name of this section and there needs to be a discussion about this- I think should be rejected. Need timeline, authority body, and impacts for each site.

B4-50

2-16 Glaringly absent are WFPD, CalFire, SFPUC

B4-51

3-11-2 What about the 280 scenic corridor?! Raymundo and Canada sites would be the only big ugly pimples in rolling grassland oak tree studded landscape in this corridor for miles and would impact not only neighbors but everyone driving this state protected (we are violating?)

B4-52

Need to block light from 280 for residents of projects. And neighbors! Town has already demonstrated that it does not care to control light from Canada College, so how will these projects do better? What mitigations rules would improve?

3.13 What are mitigations and justifications for these projects in scenic corridor, as shown by this map from 2012?

B4-53

3.14-5 Where is discussion and admission that the General Plan of 2012 is violated and subjugated to the Housing element? What are risks and costs? Property value devaluation of proximal neighborhoods needs to be discussed as a likely damage

B4-54

3.16 Muni Code open space and rural objectives also violated

B4-55

3.19 All 4 criteria are forever and significantly impacted. Report does not acknowledge

B4-56

3.1 10 Enforcement compliance addition is needed. Currently insufficient and overwhelmed

B4-57

3.1 11 280 scenic vistas would be adversely affected. Disagree w impact statement which was not substantiated

B4-58

3.1 12-13 ASRB future is uncertain, development standards have not been approved, requirements and enforcement of compliance inadequate- Mitigation measures should be proposed. Tree loss should be quantitated, and min amount lost defined and what are the impacts?

B4-59

3.1 16 What are the lighting requirements of apartments? Parking areas? Grounds? Discuss

B4-60

3.2 Measure existing air quality on site for extended impact on future residents. Mitigate measures? Filtration? Physical barrier?

B4-61

3.2 7 Monitoring station is too far away. Where is a closer one? Measure at property line closest to 280 for Raymundo site and measure cumulative

B4-62

3.2 8 Recommends 280 high volume roadway analysis on for health risk. Of what? How measure? Not included

B4-63

3.2.9 What are mitigations for sensitive receptors? What are acceptable levels? What is Raymundo level of the 6 air pollutants?

B4-64

3.2 17 General Plan and CAP seems to recommend air quality assessment for permit

B4-65

3.2 21 What about impacts and contributions to health of residents, after the construction phase?

B4-66

3.2 25 What air quality plan? What are the levels for Raymundo? When and who will test?

B4-67

3.2 27 Will 3 story and taller buildings be required to have solar? Include 3 story?

B4-68

3.2 33 Who will monitor and enforce? At what frequency? Needs to be more than at end of project

B4-69

3.3 7 Raymundo project effect on special status species needs characterization before project approval. I'm also worried about loss of wildlife enclosure and fencing

B4-70

3.3 15 Expand Open Space Element is totally violated. Will replacement open space be designated? Stanford at least replaces when they rob open space

B4-71

3.3 16 biological resource impact is possible/probable, so CEQA is necessary

B4-72

3.3 26 Raymundo is seasonally a marshy area. Paving it over and its impacts will be analyzed how? What measurements and mitigations?

B4-73

3.6 2 Geo study necessary prior to permit approval due to soil properties

B4-74

3.6 6 What data is had by Town re the fault trace that appears to be on the Raymundo site? Is there a map that shows all the hazards that are located on this and other sites? Seismic, flood, fire, geo? Shouldn't this be taken into consideration for setbacks (large for inferred fault-125ft?) etc

B4-75

3.6 8 Are there recorded slides and geo challenges on the Canada and High Rd sites?

B4-76

3.6-9 What building construction improvements are required for building a 3+ story building on expansive soil?

B4-77

3.6-12 Will fault mapping occur before permit issuance? It should be a requirement and have impact on setbacks, heights and construction requirements

B4-78

3.6-15 Section 152 will be updated to add requirements for geo report for re-zoning and MF zone for safety of residents? And to guide construction?

B4-79

3.6-18-19,20,21 Significant risks, as mentioned by this report calls for mitigation measures and building code compliance w Muni code and CBC- 125 ft set backs. This is significant and should affect guidelines and building compliance. Raymundo site. Mitigation Required. I totally disagree w the consultant's dismissal of risk to human and property. No ministerial review- must be more! Site specific hazards must be characterized before plan and building approved and commence. Construction requirements also to the standard if there is a decision to build on an unstable and environmentally sensitive parcel.

B4-80

3.5-3 Is there a tree replant requirement? How many trees can be taken down? How many should be replaced?

B4-81

3.5 5 What water conservation measures and what about gray water for landscaping requirement to prevent exacerbation of Ca drought conditions? What water company will serve the Raymundo site and how does their fee structure work for apartments?

B4-82

3.5 14 est VMT and flawed analysis does not take into consideration tris to basic services, such as grocery hospital. Bus stop is not walk or bike rideable. And conflicts w policy. Impact should not be dismissed!

B4-83

3.5 16 When will CAP be updated?

B4-84

3.5 17 423 units x 4 =1692 new residents

B4-85

3.5 22 Wouldn't the infill and Town Center approach build out be a mitigation that should be considered and listed here?

B4-86

3.5 26 What to be done for job creation?

B4-87

3.6-3 What is the 280 noise measurement at property line for Raymundo site. Unhealthy over extended period of time

B4-88

3.7 Bus stop too far away- have you considered?

B4-89

3.7.6 Multiple policy conflicts.

B4-90

3.7-9 10 What is this 15% reduction in VMT? VMT study flawed and assumptive
Bus cannot turn around

B4-91

3.9 What is the impact of construction of sewer? What is capacity of dump? Ox Mountain is full? We do not have 15 yrs of capacity. What is plan to underground utilities? Make sure that it is a requirement. Raymundo site is a seasonal bog- what are mitigations?

B4-92

3.10 You have to include the fire protection agencies! What do their maps say? Raymundo Canada are in the WUI. We do not have trucks to service 3 story buildings. Will people die because of these oversights? Who will pay? We need a design review process and zone requirements for Multi family.

B4-93

4.2-3 Infill is the superior choice from an impact perspective. How do we scrap our current stupid plan and pursue what is best for people and the environment? Rezone the whole Town. That is fair.

B4-94

4-14 This table is unreadable. Re do.

B4-95

Sage Schaan

From: jihuhs@gmail.com
Sent: Monday, June 17, 2024 11:44 PM
To: Sage Schaan
Cc: 'Renee (Stillings) Huhs'; jihuhs@gmail.com
Subject: Comments on EIR Sch# 2023050549 Dated May 3, 2024

Dear Mr. Schaan:

By way of introduction, our Family has lived at 117 Marva Oaks Drive, Woodside, since the completion of our home in 2008, and consists of: John (Father); Renee (Mother), John (Son 16) and Elisabeth (Daughter 14). We live approximately 250 yards upslope from the proposed Raymundo Site. Previously, John lived in Woodside (524 Moore Road) during the second half of the 60's while he was in grad school (JD/MBA) at Stanford.

B5-1

We have reviewed the comments submitted in opposition to the proposed EIR by our neighbors: Karen Offen; the Hansen Family; the Lubin Family, the Poletti Family; and the Alftin Family. We fully agree with their opposition, comments and observations; which we will not repeat here.

We reiterate three of our numerous comments made in response to various draft Housing Elements and Town Council meetings considering same:

1. Although the EIR (Page ES-2) states this EIR does not consider site-specific impacts, it in fact does try to "whitewash" the Raymundo Site. From about every legally-significant perspective, the Raymundo Site does not belong in this EIR. It is the wrong project, at the wrong place and at the wrong time. The only consideration favoring the Raymundo Site is that it is owned by the Town, which proposes to donate this site to a prospective developer. Other than these bureaucratic-ease and subsidy considerations, this Site doesn't benefit the prospective residents and is very much against the best interests of the existing residents (who pay staff salaries and subsidies, and vote for Town Council Members). We believe our well-intentioned comments to date have been ignored, and we have been "thrown under the bus" for the sole purpose of bureaucratic efficiency.
2. John worked as a lawyer 40 years on Wall Street and, although he is not an environmental specialist, he is, of course, knowledgeable about environmental litigation. In his view, the present EIR is so legally defective, it should not survive the inevitable litigation challenge approval of the EIR would provoke. The approval of this EIR will result in the expenditure of judicial resources, residents' resources and Town resources in the endeavor to protect a Project that should not have been proposed in the first place.
3. The "Infill Alternative" set forth on Page ES-5 appears to be a better alternative. Concentrating multifamily projects in commercial centers would be much more beneficial to our new neighbors, and to existing Town residents. Although pursuing this alternative would result in some delay, the end result would be well worth it.

B5-2

B5-3

We look forward to discussing our Point 3 above at the next Town meeting on this subject.

Very truly yours,

John & Renee Huhs

John I. & Renee J. Huhs
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jihuhs@gmail.com

June 14, 2024
To: Woodside Town Council
From: Steve Lubin
Re: May 3, 2024 Public Review Draft EIR
Town of Woodside Housing Element

Dear Woodside Town Council,

Please consider the following comments on the EIR.

The EIR states “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.”

B6-1

The Housing Element as proposed is not likely to provide the projected affordable housing and it will not be sensitive to the historic character of the Town.

Infill Alternative

The “**Infill Alternative**” presented in the EIR would result in a reduced impact as stated in the EIR. **This reduced impact alternative is the choice the Town should make.** The necessity to hold an election to change town center zoning does not prevent this choice. There is a precedent for HCD approving a Housing Element which depends on a future vote of the citizens. HCD has certified the Housing Element of the City of Sausalito which includes future zoning changes that require a vote. <https://www.sausalito.gov/home/showdocument?id=32446&t=638188850327852255> (page 13).

B6-2

The Skylonda area is not appropriate for increased housing intensity because of its remote location and unreliable road access.

The “infill Alternative” presented in the EIR only considers infill alternatives in the commercial areas of the Town. In addition to or along with the commercial area, an additional alternative with reduced impacts would add residentially zoned area close to the town center. Many infill opportunities exist in the area within walking or cycling distance of the town center. Infilling this area using expanded ADU opportunities would greatly reduce the VMT and integrate the affordable housing into the fabric of the Town rather than place it in distant, isolated, stigmatized locations as the Housing Element proposes. Infill development would also reduce the disruption of natural habitat by developing sites which have already been developed. I presented a detailed alternative approach to ADU permitting to the Planning Commission on 6/10/24 (attached). This approach would provide affordable housing opportunities and greatly reduce the VMT.

B6-3

Dismissal of infill alternatives would be a major flaw in the EIR and should be corrected.

Comments on Table ES-1

3.1.1 “No substantial adverse effect on a scenic vista.” You’ve got to be kidding!
The combination of visual impact of the Cañada Road, Raymundo and Cañada College projects will transform the visual impact from General Plan-designated scenic corridors Cañada Road and I-280. This impact would be very difficult or impossible to mitigate.

B6-4

3.1-3 The combination of the three projects mentioned above (or even any one of them) would have a major negative effect on the scenic quality of Cañada Road and I-280.

3.1-4 Any of the three projects mentioned above has the potential to create substantial light sources and harm the dark sky character of the area. Regulation of light sources should be required. Future housing cycles will require additional housing. Continuation of the trend of locating dense projects along scenic roads will have a cumulative negative impact.

B6-5

3.3 The 773 Cañada Road site is a very active wildlife habitat harboring coyotes, bobcats, mountain lions, foxes, owls, deer, several species of squirrels, many insects, amphibians and a vast variety of reptiles. Impact on this habitat should be carefully assessed. The parcel contains grassland, oak woodland, chaparral and riparian habitats. It is a unique resource in the Town.

B6-6

3.3-4 773 Cañada Road almost certainly contains wildlife nursery sites.

3.4 The High Road site has experienced significant slope instability and could require major mitigation measures. The Raymundo site is adjacent to the Hermit Earthquake fault.

B6-7

3.5 The project concentrates development far from town center and requires unnecessary driving. The additional traffic will discourage non-motorized means of transportation. This will create a vicious cycle of increasing greenhouse gas emissions.

B6-8

3.6 The project would expose residents of the proposed multi-family housing to sound levels that exceed the Town's standards. All four of the multi-family sites are located in areas where the ambient noise level (mapped in the General Plan) exceeds the maximum level established in the General Plan (55 Ldn (Exterior)). All but the Cañada College site exceed 70 Ldn. The uphill locations of 773 Cañada Road and Cañada College make mitigation extremely difficult.

B6-9

3.7 -1 The additional traffic induced by the project will have a negative effect on the comfort and safety of popular bicycle, pedestrian and equestrian routes on Cañada and Woodside Roads.

B6-10

The Town should encourage SamTrans to alter the route of its line 278 so it returns from Cañada College to Redwood City via Cañada Road rather than I-280. This would create 1/2-hour frequency bus service available to a large portion of the Town's populace and to future housing placed close to the town center.

3.10 The 773 Cañada Road site is within and the Raymundo site is adjacent to areas rated Very High Fire Hazard Severity zones by the State Fire Marshall:

<https://experience.arcgis.com/experience/03beab8511814e79a0e4eabf0d3e7247/>.

The 773 Cañada Road site is mapped "Very High Severity Fire Hazard Zone in the Town's General Plan. The June 2022 Edgewood Fire was perilously close to these sites. They were spared by the almost windless day and the intense response of CalFire involving an attack by airtankers, helicopters and ground crews.

B6-11

3.1-3 Construction of the 773 Cañada Road project would require construction of a new road. This road would require a crossing of a riparian area, substantial grading and disturbance of habitat.

B6-12

Appendix

773 Cañada Road: The project includes development of approximately 10 acres, not 5 as stated. Since development of all 10 acres is anticipated in connection with the housing project the entire site should be considered in the EIR.

The owner has submitted a subdivision map which anticipates rezoning the 10 acres from the current SR (1 acre). 1.75 acres is proposed to be zoned Multi Family (20 units/acre) and the balance of the property is proposed to be zoned R1 (20,000 sf).

The appendix states “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.” This statement should be confirmed directly with the owner.

High Road: The appendix states, “the site is does not have any identified environmental constraints” The site has significant geologic constraints and is adjacent to a high-pressure gas transmission line with significant explosive potential.

Page 20

“As shown on Figure 4, all the higher density housing sites and several small-scale sites would be located within established Scenic Corridors. Further, three of the higher density housing sites (Raymundo Drive at Runnymede Road, 773 Cañada Road, and Cañada College) and several sites identified for small scale residential projects are located adjacent to State-designated Scenic Highways. Development in these locations would be subject to review for compliance with standards established in the Municipal Code to the extent they apply, including the evaluation criteria related to site planning, building design, and landscape elements in Sec. 153.915 (D).”

The multifamily sites will not be subject to existing Town regulations.

“ Additionally, the Town intends to adopt objective design and development standards for multi-family development which would apply to the four higher density sites; however, as these standards have not yet been adopted, there is potential for impacts to scenic vistas and corridors from buildout of the Proposed Project, as well as impacts related to conflicts with regulations governing scenic quality and light and glare. These potential impacts will be analyzed in detail in the EIR, and mitigation will be recommended to address impacts, as appropriate.”

I don't see this analysis in the EIR.

Thank you for considering my comments.

Regards,

Steve

B6-13

B6-14

B6-15

B6-16

Steve Lubin Comments on Town of Housing Element (2023-2031)
June 24, 2022

Since incorporation Woodside has experienced continuously decreasing economic diversity of its residents. It is now far less likely that those who are employed in town live here.

Traffic has increased substantially while the population has barely budged. This increase is directly related to increased sprawl and auto dependence. More traffic, not more people, has decreased our quality of life.

The State has and probably will continue to impose housing requirements on the Town such as relaxed ADU rules, SB9 and RHNA quotas. Some aspects of these requirements conflict with many of our traditional planning concepts and promote sprawl and traffic. This does not mean we can ignore the need for housing. We must proactively plan for housing which is consistent with our local values. If we are not proactive on this issue, we will have no defense against more onerous mandates from the State.

It is time to update our founding goal of preserving open space to include a more comprehensive environmental benefit. We need to plan for a compact, pedestrian friendly town center with affordable housing within walking distance.

The Draft Housing Element does not do this. Its action plan is not likely to provide significant housing or preserve the character of the Town.

The provision of housing which serves people with a wide range of income levels is a desirable goal for the Town of Woodside. This diversity of housing would decrease traffic and congestion by providing housing close to work for people employed in Woodside.

The “significant increase of jobs” in town since 2010 noted in the Element highlights the need for convenient housing.

Woodside’s founding principle of preserving open space and rural (rustic setting with ample open space) environments is central to the planning goals of Woodside.

Providing additional housing in Woodside will transform the character of the Town. This change can either promote sprawl, fire risk, traffic and destruction of open space or it can cluster increased density close to services so we can create a pedestrian oriented town center, reducing traffic and the need for parking.

The Draft Housing Element furthers suburbanization by placing relatively large (for Woodside) developments around the edges of Town, increasing traffic and destroying open space.

We do not have control over all the causes of increased traffic, but we can control the distribution of housing and the making of a pedestrian friendly town center

The current cycle of RHNA requirements is not the end of the need for more housing, nor is it likely to be the end of State housing requirements. If we fail to look at the long-term impacts, we will stumble into a chaotic future. Multiple cycles of dense housing on the edges of town will result in an amorphous, inside-out jumble of traffic inducing, nature destroying development.

The Town seems to hope the State requirements will disappear. It has presented a Draft Housing Element that is not likely to succeed in actually providing housing. If the State requirements do not go away, we will be stuck with implementing a poorly conceived plan.

The proposed Housing Element is not likely to succeed in meeting the State's housing requirements because the chosen sites are not suitable for affordable housing:

- The "Commercial Corridor" sites are too few in number to result in sufficient applications to meet State requirements.

- The Farm Hill site is constrained by General Plan designation & (according to the General Plan) a deed restriction as "open space for the preservation of natural resources". Access to the site is only possible through one of the two Barkley Fields parcels. The deed to these parcels restricts their use, on penalty of reversion of title, to "community park or sports field facility". Has the Town researched title restrictions on this property and access to it?

- The Runnymede site is adjacent to extensive wildland chaparral and oak forest on the adjacent watershed lands. It is a sitting duck for wildfire. This site, along with the entire neighborhood is accessed by a single road with no alternate emergency access.

A dense project here would not integrate with the surrounding neighborhood. Its proximity to the freeway invokes concerns for "environmental justice".

The Draft Element shows lands along Runnymede as "contiguous" to a sewer. The sewer in Cañada Road is on the opposite side of I 280 and generally at a

higher elevation than Runnymede Road. The site is also within a few hundred feet of the Hermit earthquake fault.

Has the Town researched title restrictions on this property? Why did the Town acquire it?

The Runnymede site is within the I 280/Cañada Road Scenic corridor. Placing a large building here would certainly not be consistent with the Town's criteria for scenic corridors. These criteria include requirements that the project "conserves the property's open space, natural features, vegetation, and wildlife by subordinating development to the site's natural conditions" and "preserve(s) Woodside's rural residential character, and maintain(s) the visual continuity of natural landforms". Is this proposed development the northern gateway to town that we want?

- The 733 Cañada Road site is within the only CalFire "Very High Fire Hazard Severity Zone" in Town which is completely outside of the Western Hills. This week the Edgewood fire encroached to within 2000 feet of this site. The fire was a terrifying demonstration of how vulnerable the site, within the Edgewood Fire evacuation zone, is to wildfire.

The site is constrained by Emerald Lake Hills Specific Plan prohibiting sewer connection for development purposes.

The site slopes steeply upwards from Cañada Road and I 280 with no shelter from freeway noise. Its direct exposure to freeway noise and fumes raises "environmental justice" concerns.

Like the Runnymede site the Cañada Road site is within the I 280/Cañada Road Scenic corridor. It is subject to the same esthetic standards mentioned above.

Are these twin developments on each side of I 280 the northern gateway we want?

The Cañada Road site is an important wildlife habitat frequented by foxes, coyotes, deer, rattlesnakes, rabbits and, of course, mountain lions.

- The High Road site is constrained by geologic instability and a difficult site configuration. It was acquired as open space. Has the Town researched title restrictions on this property? Is this project the eastern gateway that we want?

All the chosen sites except the "Commercial Corridor" are remote from commercial and cultural services. This would result in social isolation/lack of integration with the social fabric of the Town and unavailability of convenient transit, walking or bicycling.

The Town owned sites are not “surplus land” as they have been treated, but open spaces acquired for specific purposes.

The Draft Housing Element states:

The State’s Land Use Priorities include (1) Promoting infill; (2) Protecting natural and working landscape and recreation areas; and (3) Encouraging efficient development patterns adjacent to existing developed areas, that are served by transportation and that minimize ongoing costs associated with Natural Disasters.

The Element’s “Action Plan” does not reflect these priorities.

The sites identified for low income housing in the Draft Element fail to meet almost all of the criteria identified on pages 3-20 & 3-21 for AFFH.

The State seems to have defined low income housing as apartment buildings with 10 to 200 units and a density of 20 units/acre or greater. This is not a model which will integrate with Woodside. Projects following this model would leave their residents isolated and stigmatized. We must work to develop a model of affordable housing which can integrate with the fabric of the Town.

The Council has not considered inclusionary zoning which could allow small projects which fit the scale of the Town.

As an alternate to the proposed Housing Element we should encourage a range of small-scale housing close to town center and reimagine the town center as a diverse, compact, walkable community surrounded by our rural landscape.

The “Missing Middle” proposal that was rejected by the Town Council was a good start at a new vision for but did not go far enough.

To the extent the State can be brought along, the Town should consider the following strategy:

Zone an area within walking distance to town center to allow multiple units (10 units/acre?) while retaining overall building coverage similar to the existing regulations. The Town’s generous coverage allowances would allow many additional small housing units within the existing development pattern but limit the magnitude of new projects.

Zone an area within bicycling distance to allow an increased number of units (5 units/lot?).

Require the additional units be available to a range of income levels. This could be accomplished by requiring some units be restricted to low income occupants in projects with a larger number of units and by an inclusionary housing fee on smaller projects.

To encourage the construction of low income units they could be subsidized with proceeds from an inclusionary housing fee. This fee would apply to additional units (allowed by rezoning) as well as to subdivisions, large houses and major additions.

This zoning could be implemented through the creation of rent controlled units or by deed restricted subdivisions for owner occupied units.

Consult with SamTrans to co-ordinate housing with a potential bus route.

The building of ADU's has increased housing opportunities without a large disruption to the character of the Town. Like ADU's the strategy outlined above would be implemented by individual property owners and allow an organic increase in housing opportunities without going against the grain of the existing development pattern. This strategy would allow the development of an open market for these units, available to all landowners within the designated districts. It would eliminate the appearance of spot zoning and the granting of special favors to a few landowners.

Unlike ADU's and SB 9, homegrown zoning would allow more local control over design of the units.

The large houses paying the inclusionary housing fees play a significant role in creating additional employment in town. This employment contributes to housing shortages and traffic, so it is appropriate that these houses contribute to alleviating the problems. Since not all the housing shortfall is due to new construction, we should also consider a town-wide affordable housing tax based on house value.

NAHB and Opticos Design have prepared a report: [Diversifying Housing Options with Smaller Lots and Smaller Homes](https://www.nahb.org/-/media/NAHB/advocacy/docs/top-priorities/housing-affordability/nahb-2019-small-homes-research-report.pdf). This report suggests options for how housing in the zoning I propose could be designed.

<https://www.nahb.org/-/media/NAHB/advocacy/docs/top-priorities/housing-affordability/nahb-2019-small-homes-research-report.pdf>

153.211 - ACCESSORY DWELLING UNITS

(A)

Requirements applicable to all accessory dwelling units.

All accessory dwelling units whether internal, attached to, or detached from the main dwelling unit, shall conform to the following requirements:

(1)

Building and fire safety, and septic. Conformance with all applicable building, housing, zoning, and site development laws, codes, and regulations shall be required, as applicable to accessory dwelling units. Accessory dwelling units shall not be required to provide fire sprinklers if they are not required for the primary residence and may employ alternative methods for fire protection. The construction of an accessory dwelling unit shall not require installation of fire sprinklers in an existing primary residence structure, subject to state regulations.

(2)

Parking and driveway access. Off-road parking spaces shall be provided in accordance with the requirements of [Sections 153.221](#) through [153.225](#), as applicable to accessory dwelling units; and specifically as follows:

(a)

Parking requirements. Parking requirements for accessory dwelling units shall be one parking space per accessory dwelling unit that has one or more bedrooms. No parking spaces shall be required for units that do not have a separate bedroom, such as a studio accessory dwelling unit. Off-street parking shall be permitted in setback areas in locations determined by the Town, or through tandem parking, unless specific findings are made that parking in setback areas or tandem parking is not feasible based upon specific site or regional topographic or fire and life safety conditions.

(b)

Parking waiver. Parking requirements for accessory dwelling units are not required in the following instances:

1.

The accessory dwelling unit is located within one-half mile walking distance of public transit, including transit stations and bus stops;

2.

The accessory dwelling unit is located within an architecturally and historically significant historic district;

3.

The accessory dwelling unit is part of the existing primary residence or an existing accessory structure;

4.

The accessory dwelling unit is located in an area where parking permits are required, but are not offered to the occupant of the accessory dwelling unit; or

5.

The accessory dwelling unit is located within one block of a car share vehicle.

6.

The accessory dwelling unit is included in an application to create a new single-family or multifamily dwelling on the same lot and the proposed accessory dwelling unit meets one or more of the criteria for a parking waiver listed above.

(c)

Driveway access. The principal access driveway shall be used as the primary access for any proposed accessory dwelling unit, unless, pursuant to Municipal Code [Section 151.44](#), a second driveway exception is approved.

(3)

Application review. All plans for accessory dwelling units shall be subject to ministerial review and approval or denial by the Planning Director within 60 days of receiving a complete application. However, if an accessory dwelling unit is proposed in conjunction with the construction of a new main dwelling, the Planning Director need not act on the accessory dwelling unit prior to the issuance of the permit for the main dwelling.

(4)

General accessory dwelling unit regulations. All requirements related to accessory buildings contained in the Municipal Code, including, but not limited to: height, setbacks, floor area, lot coverage, natural state, environmentally sensitive areas, slopes in excess of 35 percent, second driveways, grading, and landscaping shall apply. The following ministerial exceptions shall apply to accessory dwelling units:

(a)

Exceptions to setbacks.

1.

Detached accessory dwelling units. New detached accessory dwelling units may have a side and/or rear setback of no less than four feet from the side and rear property lines.

2.

Attached accessory dwelling units. New accessory dwelling units attached to the main residence may have a side and rear setback of four feet from the side and rear property lines, but no portion of the main residence may be located within the required setbacks outlined in Municipal Code Section 153.207(A)(Table H). Portions of attached accessory dwelling units located within the required setbacks outlined in Section 153.207(A)(Table H) shall have an 11-foot maximum plate height and a 17-foot maximum overall height, except as permitted by Section [153.211\(A\)\(10\)](#) and (11).

3.

Two **or more** accessory dwelling units. Properties with two **or more** accessory dwelling units, attached or detached, may only have one unit with a side and/or rear setback of four feet. A **Additional-second** accessory dwelling unit shall comply with the required setbacks outlined in Municipal Code Section 153.207(A)(Table H).

4.

Size limitation. Notwithstanding Section [153.211\(A\)\(6\)](#) and (7) below, an accessory dwelling unit that does not comply with basic setback requirements outlined in Section [153.207\(A\)](#) shall be limited to 800 square feet of floor area within the required basic setbacks.

(b)

Exceptions to height regulation.

1.

Detached accessory dwelling units. New detached accessory dwelling units may be up to 18 feet in height if the existing or proposed primary structure is a multistory multifamily dwelling. New detached accessory dwelling units may also be up to 18 feet in height, or up to 20 feet in height to match the roof pitch of the primary residence structure, if located within one-half-mile walking distance of a major transit stop or high-quality transit corridor, as defined in Section 21155 of the Public Resources Code.

Attached accessory dwelling units shall conform to the height limits for the primary structure.

(c)

Exceptions to WMC Regulations. If it is not feasible to comply with all regulations of the Municipal Code to construct one 800 square foot accessory dwelling unit on a property, the applicant shall provide all necessary information requested by the Town (e.g., a topographic survey, septic feasibility study, etc.) to demonstrate that it is infeasible to construct one 800 square foot accessory dwelling unit while complying with all applicable regulations for review by the Town. Once the complete feasibility study is reviewed by the Town, the Planning Director shall determine which Municipal Code regulations may be reduced and/or waived by evaluating feasible locations for the accessory dwelling unit that create the fewest impacts to environmentally sensitive areas such as stream corridors, wetlands, and steep slopes.

(d)

Exceptions for dormers. An accessory dwelling unit above a detached garage that complies with the basic setbacks in 153.207(A)(Table H), may include dormer(s) up to 65 percent of the horizontal length of each side of the roof to provide for increased interior head height.

(e)

Noticing requirements for exceptions. Accessory dwelling units which utilize any of the ministerial exceptions in Section [153.211\(A\)\(4\)\(a\)](#) through Section [153.211\(A\)\(4\)\(c\)](#) shall be noticed to any property owner of property adjacent to the proposed accessory dwelling unit, including lots located across an abutting public or private road. The notice shall be sent within five business days of receipt of the application and shall clearly state that an accessory dwelling unit application is ministerial and therefore there are no appeal rights.

(5)

Number of accessory dwelling units allowed. ~~No more than two accessory dwelling units, including accessory dwelling units in barns and junior accessory dwelling units, are permitted on a parcel subject to Table L-1.~~

Establish two density areas.
 1/2 mile from Canada Rd & Woodside Road intersection &
 1/2 mile to 1 mile from Canada Rd & Woodside Road intersection excluding areas east of I280.
(These zones could be adjusted for access condition, availability of utilities or other development constraints)

TABLE L-1: Number of Accessory Dwelling Units Allowed	
Parcel Size or Zoning	Number of Accessory Dwelling Units Allowed
Equal to, or greater than, 1.5 acres 1/2 mile density area	A maximum of six, whether attached or detached
Equal to, or greater than, 1.5 acres 1 mile density area	A maximum of four, whether attached or detached
Equal to, or greater than, 1.5 acres Outside of density areas	A maximum of two, whether attached or detached.
Equal to, or greater than, 1.0 acre; but less than 1.5 acre 1/2 mile density area	A maximum of three, whether attached or detached
Equal to, or greater than, 1.0 acre; but less than 1.5 acre 1 mile density area	A maximum of two, whether attached or detached
Equal to, or greater than, 1.0 acre; but less than 1.5 acres Outside of density areas	A maximum of one detached and one attached.
Less than 1.0 acre 1/2 mile density area	No more than three, whether attached or detached,
Less than 1.0 acre 1 mile density area	No more than two, whether attached or detached
Less than 1.0 acre Outside of density areas	No more than one, whether attached or detached, and one junior accessory dwelling unit.
In the R-1 District 1/2 mile density areas	A maximum of three, whether attached or detached
In the R-1 District 1 mile density areas	A maximum of two whether attached or detached
In the R-1 District Outside of density areas	No more than one, whether attached or detached, and one junior accessory dwelling unit.

(6)

Attached accessory dwelling units. The floor area of an attached accessory dwelling unit shall not exceed 50 percent of the size of the main residence, including the accessory dwelling unit, or 1,500 square feet, whichever is less.

(7)

Detached accessory dwelling units. The floor area of a detached accessory dwelling unit, including the floor area of any attached garage, shall not exceed 1,500 square feet.

(8)

Basement accessory dwelling units. Basement area used for an accessory dwelling unit, or a portion thereof, shall be limited to the unit sizes prescribed in divisions (A)(6) and (A)(7) of this section.

(9)

Rental accessory dwelling units. Accessory dwelling units which are rented shall not be rented for less than 30 consecutive days.

(10)

Existing detached garages and other existing accessory structures converted to accessory dwelling units. No new setback shall be required for an existing detached garage or other existing accessory structure that is converted to an accessory dwelling unit and a setback of no more than four feet or the setback of the existing detached garage, whichever is greater, from the side and rear lot lines shall be required for an accessory dwelling unit that is constructed above an existing detached garage, as long as access and egress requirements, as prescribed by the Building Code and Municipal Code height requirements are met.

(11)

Existing attached garages converted to accessory dwelling units. No new setback shall be required for an existing attached garage, storage area, or similar attached and enclosed area, that is converted to an accessory dwelling unit and a setback of no more than four feet or the setback of the existing attached garage, whichever is greater, from the side and rear lot lines shall be required for an accessory dwelling unit that is constructed above an existing attached garage, as long as access and egress requirements, as prescribed by the Building Code and Municipal Code height requirements are met.

(12)

Processing requirements.

(a)

Accessory dwelling units within an existing structure. An accessory dwelling unit within an existing structure (including the primary residence structure, attached or detached garage, or other accessory structure) shall be permitted ministerially with a building permit, and a demolition permit, if applicable, within 60 days of the submittal of a complete application, in compliance with other standards within the chapter, if complying with the following codes and requirements:

1.

Building and safety codes;

2.

Independent exterior access from the existing residence;

3.

Sufficient side and rear setbacks for fire safety, as set forth in the Building Code; and,

4.

A minimum four-foot setback for a second-story accessory dwelling unit above an existing nonconforming garage.

5.

Construction of a new access stair located a minimum of five feet from the side or rear property line, or the existing setback of the building, whichever is greater, to access a new accessory dwelling unit built above an existing, legal nonconforming garage is allowed. An existing garage located at the required setback shall be allowed an access stair which may encroach a maximum of five feet into the required setback.

(b)

Denial. In order to deny an accessory dwelling unit, the Planning Director shall find that the accessory dwelling unit would be detrimental to the public health and safety and shall transmit in writing to the applicant a full set of comments explaining the reasons for the denial within 60 days of the submittal of a complete application.

(c)

Nonconforming conditions. The Town shall not deny an application to create an accessory dwelling unit due to the existence of, or failure of the property owner to correct, nonconforming zoning conditions, building code violations, or unpermitted structures that do not present a threat

to public health and safety and would not be affected by the construction of the accessory dwelling unit. The Planning Director shall not condition the approval of a permit to create an accessory dwelling unit on the correction of existing nonconforming zoning conditions.

(B)

Requirements applicable to accessory dwelling units within barns.

In addition to the requirements applicable to all accessory dwelling units, any such accessory dwelling units located within barns shall conform to the following additional requirements:

(1)

No more than one accessory dwelling unit within a barn shall be permitted on a parcel with the following exception: up to two accessory dwelling units may be permitted within a barn located on a property containing a Town-approved professional stable. Such additional accessory dwelling units shall only be permitted after approval of a conditional use permit by the Planning Commission, in accordance with applicable conditional use permit procedures.

(2)

The floor area of the accessory dwelling unit within a barn shall be no greater than 50 percent of the footprint area of the barn, or 1,200 square feet, whichever is less, but in no instance will such an accessory dwelling unit be limited to less than 850 square feet or 1,000 square feet for accessory dwelling units that include more than one bedroom.

(3)

The accessory dwelling unit and the barn shall contain an automatic fire sprinkler system, and the accessory dwelling unit shall be separated from the other portions of the barn with a one-hour firewall, in accordance with the Town's Building Code.

(4)

An accessory dwelling unit in a barn may be located on either a first or second floor, of that portion of the barn that adheres to required setbacks.

(C)

Requirements applicable to junior accessory dwelling units.

A junior accessory dwelling unit is a unit that is no more than 500 square feet in size, is contained entirely within an existing or proposed main dwelling structure, includes an efficiency kitchen, has a separate exterior entry from the main dwelling, and maintains an interior connection to the main living area of the main dwelling. Junior accessory dwelling units shall conform to the following requirements:

(1)

~~Only one junior accessory dwelling unit is allowed per lot.~~

(2)

Owner-occupancy is required in any residence that contains a junior accessory dwelling unit. The owner may reside in either the remaining portion of the structure or in the newly created junior accessory dwelling unit. Owner-occupancy shall not be required if the owner is a governmental agency, land trust, or housing organization.

(3)

~~A junior accessory dwelling unit shall be constructed within the existing walls of the structure, including attached garages, attached storage areas, and other similar attached and enclosed areas.~~

(4)

A junior accessory dwelling unit may include separate sanitation facilities, or may share sanitation facilities with the existing structure.

(5)

A junior accessory dwelling unit shall include a separate entrance from the main entrance to the structure, with an interior entry to the main living area. A junior accessory dwelling unit may include a second interior doorway for sound attenuation.

(6)

A junior accessory dwelling unit shall have an efficiency kitchen, which shall include all of the following:

(a)

A cooking facility with appliances; and,

(b)

A food preparation counter and storage cabinets that are of reasonable size in relation to the size of the junior accessory dwelling unit.

(7)

A junior accessory dwelling unit does not require additional parking.

(8)

This subdivision shall not be interpreted to prohibit the requirement of an inspection, including the imposition of a fee for that inspection, to determine whether the junior accessory dwelling unit is in compliance with applicable building standards.

(9)

An application for a permit pursuant to this section shall, notwithstanding Section 65901 or 65906 or any local ordinance regulating the issuance of variances or special use permits, be considered ministerially, without discretionary review or a hearing. The Planning Director shall approve or deny any application and the Town shall issue a building permit within 60 days of submission of a complete application for a permit pursuant to this section. The Town may charge a fee as reimbursement for costs incurred in connection with the issuance of a permit pursuant to this section.

(10)

For the purposes of any fire or life protection ordinance or regulation, a junior accessory dwelling unit shall not be considered a separate or new dwelling unit. This section shall not be construed to prohibit the Town from adopting ordinances or regulations relating to fire and life protection requirements within single-family residences and uniformly applying those ordinances and regulations to all single-family residences within the zone regardless of whether the single-family residence includes a junior accessory dwelling unit or not.

(11)

For the purposes of providing service for water, sewer, or power, including a connection fee, a junior accessory dwelling unit shall not be considered a separate or new dwelling unit.

(12)

This section shall not be construed to prohibit the Town from adopting ordinances or regulations related to parking or a service fee or a connection fee for water, sewer, or power, that applies to single-family residences and uniformly applying those ordinances and regulations to all single-family residences regardless of whether the single-family residence includes a junior accessory dwelling unit.

Subject: Ideas regarding changes to zoning for ADU's

Date: Mon, 10 Jun 2024 15:53:33 -0700

From: Steve Lubin <steve@stlubin.net>

To: planningcommission@woodsideca.gov, Sage Schaan <sschaan@woodsidesidetown.org>, Woodside Council Members <council.members@woodsideca.gov>

Dear Planning Commission,

HUD has requested that the Town revise its ADU regulations to encourage accelerated construction of ADU's.

Encouraging more ADU's is a very good way to increase housing opportunities while maintaining the character if the Town.

ADU's are built in small increments and end up with a better fit to their neighborhoods than larger housing projects.

I am a big fan of the Strong Towns organization. I suggest the Town follow one of their mantras:

1. No neighborhood can be exempt from change.

2. No neighborhood should experience sudden, radical change.

<https://www.strongtowns.org/journal/2020/3/4/two-simple-rules-for-healthy-neighborhood-change>

Providing additional housing in Woodside will transform the character of the Town. The Town's current Housing Element places an unfair burden on a few neighborhoods at the Town's periphery. It also isolates affordable housing from the life of the community. This transformation can either promote sprawl, fire risk, traffic and destruction of open space or it can cluster increased density close to services preserve the town character and avoid constrained areas. If we take the latter course we can create a pedestrian oriented town center, reducing traffic and the need for parking. Enlarging the number of ADU's allowed in the central part of the Town will support this goal. Please see my attached 6/9/24 suggested changes to the zoning ordinance. In case you think this is a new idea I have attached my 6/24/22 letter to the Town.

Also please see my responses to the questions posed in the staff report for the June 12, 2024 Planning Commission meeting. I have suggested answers that will support the goal stated above.

I'm sure there are aspects that I have not considered but we need to start thinking about how to encourage affordable housing integrated into the cultural fabric of the Town.

I will not be able to attend your Wednesday meeting. Please call me if you have questions 650-851-4234

Regards,

Steve

--

Stephen Lubin
Thalia & Stephen Lubin, Architects
11 Palm Circle
Woodside, CA 94062
650-851-4234

Questions for the Planning Commission related to plate height for detached ADUs:

1. Should the Town consider removing plate height maximums for detached ADUs, such that the only height limitation related to ADUs would be the overall height maximums?
2. If not, should the Town consider increasing the allowable plate height above the current 11-foot maximum for all sides of ADUs?
3. Alternatively, should the Town set a maximum average plate height for ADUs, rather than a maximum plate height applied to all sides of an ADU, to accommodate more ADUs designed with flat or shed style roofs?

The Town should establish a maximum plate height for ADU's of 11 feet at the 4' setback rising along a 45 degree line to a maximum of 18'. This would protect neighbors but allow 2 story ADU's located away from property lines.

Questions for the Planning Commission related to plate height and overall height for detached ADUs on hillside lots:

1. Should the Town treat overall height and/or plate height of ADUs differently on hillside lots? **No**
2. Should plate height requirements be removed for detached ADUs on hillside lots? **No**
3. Should the Town regulate average plate height, rather than plate height on all sides, of detached ADUs on hillside lots? **No**
4. Should the Town require the uphill side of a detached ADU on a hillside lot to meet the 11-foot plate height maximum, but allow the downhill side plate heights to exceed that maximum? **No**

The Town should continue to protect the light air and privacy of neighbors. But allow increased ADU intensity in non-constrained areas.

Residence Sizes:

1. Should the Town consider increasing the amount of ADU floor area that is excluded from the Total Floor Area and Maximum Residence Size calculations? **Yes.**
2. If so, should the Town exclude all ADU floor area from these calculations? **No.**
3. Alternatively, should the Town exclude 1,500 square feet of ADU floor area (maximum ADU size) from these calculations? **Yes.**

Questions for the Planning Commission related to Second Driveways:

1. Should the Town consider allowing secondary driveways for ADUs without requiring that the applicant obtain an exception? **No.**
2. If so, should a secondary driveway be allowed for all ADUs, or only for detached ADUs?
3. Additionally, should a second driveway only be allowed for ADUs on lots adjacent to two or more roads? **No.**
4. If a second driveway is allowed for an ADU on a lot adjacent to only one

road, are there criteria that should be considered (e.g. distance between the ADU and the roadway, distance between the ADU and the primary dwelling, or distance between the ADU and the existing driveway)?

Questions for the Planning Commission related to ADUs and septic on slopes greater than 35%

1. Should the Town allow ADUs to be constructed in slopes greater than 35%? **No.**
2. If so, should the allowed square footage in a slope of over 35% be capped? **No.**
3. Should the Town allow septic systems needed to serve proposed ADUs in slopes over 35% if they conform to the County's requirements for such systems? **Yes with restoration to natural state.**

The Town should protect its traditional protection of natural areas, including slopes over 34%. We should direct ADU's to non constrained areas.

Questions for the Planning Commission related to Natural State:

1. Should the Town exempt ADUs from the Natural State requirements without an exemption? **No.**
2. If so, should the Natural State exemption for ADUs be capped at a specific square footage (e.g. 800 or 1,500 square feet)?
3. Should a Natural State exemption for ADUs apply only to second ADUs on lots to incentivize property owners to build multiple ADUs?

Questions for the Planning Commission related to ADU conversions of existing structures:

1. Should the Town allow ADUs converted from existing accessory structures to exceed the maximum ADU size of 1,500 square feet, so long as the footprint of the existing structure is not altered? **Yes.**
2. Alternatively, should the Town allow more than the maximum number of ADUs allowed when those ADUs are converted from structures large enough to accommodate multiple ADUs? **Yes.**
3. Should the Town remove the requirement that ADUs converted from barns be no larger than 50% of the barn footprint? **Yes.**
4. If so, should the Town allow barns to be fully converted to a single or multiple ADUs? **Yes.**

Questions for the Planning Commission related to the number of ADUs allowed:

1. Should the Town increase the number of ADUs allowed on lots throughout Town? **No.**
2. Should the Town retain a cap on the number of ADUs allowed in the R-1 District, regardless of lot size? **No.**
3. How many ADUs should be allowed on the largest lots in Woodside (SCP-10 District)? **Depends on the location. Maximum incentives should be applied to close in locations with few development constraints.**
4. Should site constraints, such as slopes over 35%, High Fire Severity, and Fault Zones directly affect the number of allowable ADUs on a site, or instead allow the design/construction requirements related to those

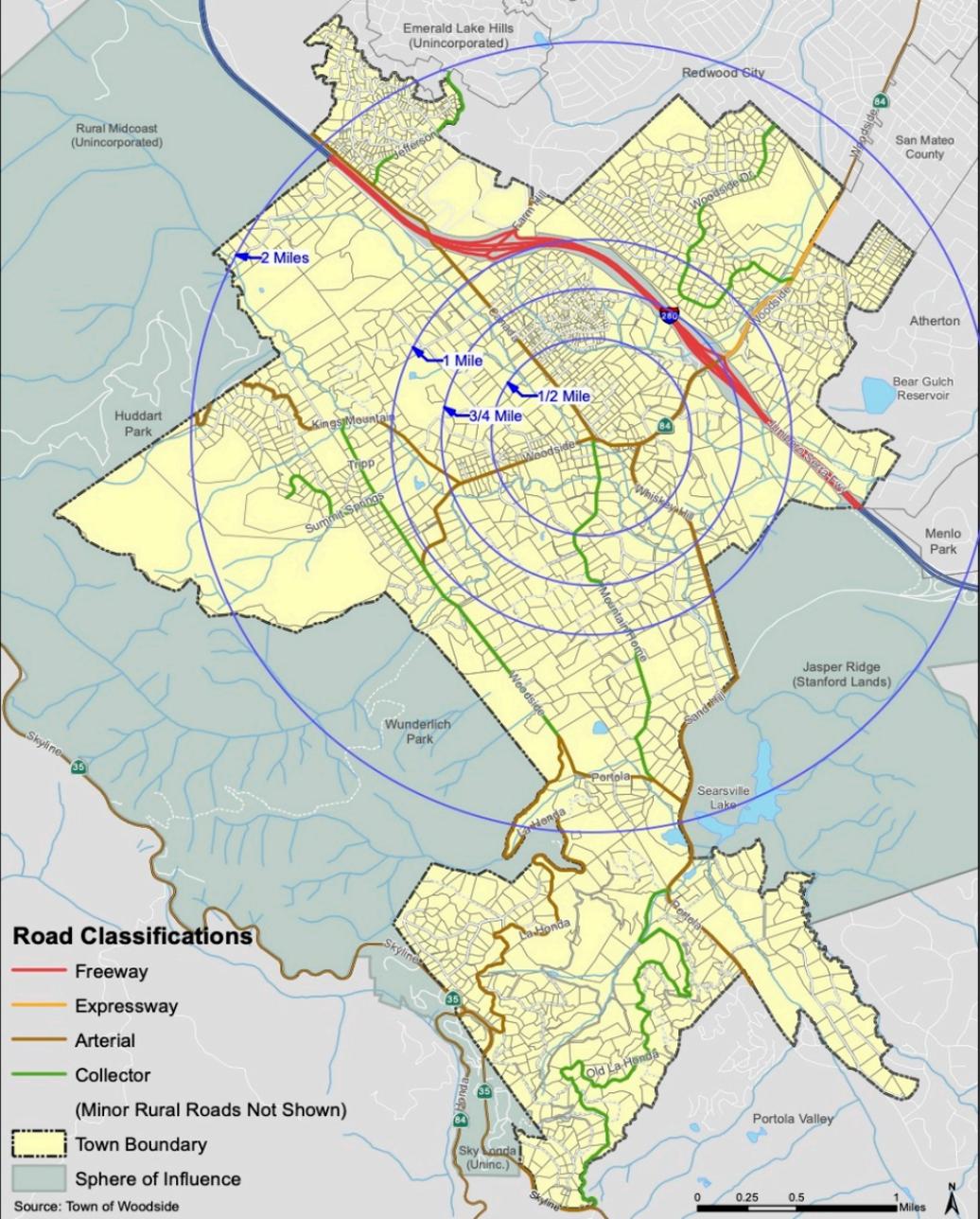
constraints to control whether the maximum number of ADUs for the lot size can be feasible constructed? **The number of ADU's should be related to the constraints on a site. Please see my "2024_06_09 ADU Trial Zoning Changes.pdf". This document presents ideas on how to direct development of ADU's to central, less constrained parts of the Town.**

Questions for the Planning Commission related to previously approved designs:

1. Should the Town keep a record of approved modular or prefabricated ADU designs and make that record available to the public? **Yes.**
2. If so, should the Town approve applications that designate previously approved modular or prefabricated designs, regardless of applicable design criteria (i.e. overall height, plate height, etc.)? **No.**

Questions for the Planning Commission related to an amnesty program:

1. Should the Town consider the creation of an amnesty program to incentivize owners of unpermitted living units to legalize those units as permitted ADUs? **Yes.**
2. If so, what incentives should be offered to compel property owners to disclose and legalize their unpermitted living units? **Maximum leniency regarding code compliance, fee subsidies.**



Road Classifications

- Freeway
- Expressway
- Arterial
- Collector

(Minor Rural Roads Not Shown)

- Town Boundary
- Sphere of Influence

Source: Town of Woodside



June 17, 2024
To: Woodside Town Council
From: Maggie Mah

Subject: Draft EIR Comments

First of all, it should be said that the cumulative effect of all Environmental Impact Reports has been to provide vocational opportunities for people who are not affected by either the consequences of their findings or their ridiculous and unenforceable “mitigations?” This one is no exception. It also fails to address the impacts to adjacent trails, San Mateo County and GGNRA lands as well as true quality of life issues for the existing residents in the proposed areas. The comments below address just two of the report’s sections.

B7-1

Re: Section 3.1 Aesthetics

The report finds no significant impact on scenic vistas and requires no mitigation. How can clusters of two-story structures constructed on previously open land **not** have an impact? How can it be found that construction of this magnitude does not damage scenic resources, or degrade the visual charm of public views? How can construction of 40-50 two story structures NOT have a substantial impact on light emissions? How can this report be valid relative to design standards that have not been adopted? Have the people who wrote this EIR driven down 280 and seen what two huge and unfortunately built single family houses have done to the scenic corridor? I’m guessing they decided the impacts were so great that nothing could be done. Better to say it’s fine and hope it goes away?

B7-2

Re: Section 3.2 Air Quality

The mitigations are directed toward air quality emissions during construction and involve mitigation such as watering twice daily to minimize dust, restrictions on idling time and “completion as soon as possible.” Who monitors these things? How do you define, “as soon as possible.” You could literally drive a truck through these and many other supposed mitigations in this report.

B7-3

Re: Infill Alternative, I believe that the option of changing the zoning in the Town Center to allow residential use is one of the few useful sections of this report. It’s the way to go and should have been seriously considered previously.

B7-4

Finally, I would like to request a brief explanation of how the policies of the General Plan relate to the RHNA requirements. Looks to me like they are toast but I hope I’m wrong.

KO Concerns about Draft Environmental Impact Report (EIR), 17 June 2024 (final)

To: the Woodside Town Council, Planning Commission; Town Staff, in particular Kevin Bryant and Sage Schaan: and members of the Conservation and Open Space Committee

From: Karen Offen (450 Raymundo Drive, Woodside; kmoffen@stanford.edu)

The stated purpose of this EIR is “to balance environmental, economic, and social objectives,” but pays minimal attention to the “economic and social” aspects of the neighborhood as concerns the existing residents of this area, which have been repeatedly voiced and, it seems, repeatedly ignored. More verbiage is provided to consider the impact (short-term but also long-term) of the Project on the bats and the Dusky-Footed Woodrat than is provided to address the concerns of the human residents of the area impacted.

B8-1

Some of us have owned property and may have lived here longer than any of the indicated threatened species. Most of us residents on Raymundo Drive feel quite threatened by the rezoning and potential construction of a sizeable urbanizing housing project at the base of our very rural and winding road, irrespective of whom it is being built for. Locations closer to the town center would be far more acceptable. “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.” This does certainly not describe The Project, nor does it describe our town’s future as envisioned in the EIR. This Project is ultimately about urbanization, which is what many of us have attempted – and so far succeeded - to escape from.

B8-2

Action item: factor into the EIR the continuing concerns of the surrounding neighborhoods, including mental health, safety, and (not least, being a socio-economic issue) threats to rural residential property values. This should have been done via interviews, as is often the case for EIRs. The comments in appendix (Report, vol. 2) seem very limited and selective, given how many different people have made public comments and have written letters to the Town.

B8-3

This draft EIR literally embeds the Raymundo Drive site (aka APN 072-041-040) as destined for rezoning for multi-family housing, which would focus on low/very low income housing (currently set at 12 units out of 17; 5 are currently allotted to moderate income families), despite of and over the objections of the residents of this street in the northern part of Woodside to any housing development whatsoever. In sec. 2.11 of the report, it indicates that this parcel would be “for the construction of workforce housing.” Does this suggest rental housing? Or condominium ownership? Would preference be given to workers who are employed in Woodside? I do recognize the need for affordable housing that would serve those who are employed in Woodside, but it should be closer to the town center so the residents could actually walk to work – at the school, at the fire department, at town hall, at the local restaurants, etc. That would also free up the parking lots in town for customers, as the one-time commuters could leave their cars at home.

B8-4

1. In either case (rental or purchase), the EIR pays no attention to considerations of potential traffic bottlenecks at the intersection of Raymundo (a dead-end street with only one outlet) and

B8-5

Runnymede, especially in case of fire or earthquake emergencies. No consideration is given to providing an alternate emergency evacuation route for those who, like me, live upstream from this site, and the horseowners evacuating their horses with trucks pulling horse trailers who would be blocked behind traffic (potential minimum of 34 vehicles, 17x2) exiting this multi-family housing. We might all foreseeably perish in wildfire flames just because we are stuck in traffic (as during the recent Paradise fire). Our concerns as residents of Raymundo Drive have been presented in multiple public hearings, written comments to the Town Council, and in the press. The Town, which inadvertently owns this site (an artifact of the construction in the 1970s of the interstate highway, which lies immediately to the East) refuses to remove this site from consideration, despite formal deed restrictions on its use and, more generally, its being a very unfortunate site for multi-family housing. In particular, the site does not meet any of the criteria for urban infill, near transportation, stores and shops, etc., that were set out in the earlier RHMD documents.

Action item: These concerns should be expressly stated and acknowledged in the EIR. This property, now zoned as Open Space, should absolutely **not** be subjected to rezoning as residential/Multi-family.

2. The draft EIR also pays no attention whatsoever to the property on the northern edge of this parcel, which is labeled on the report's maps labeled as "Rural Midcoast (unincorporated)". This area MUST be relabelled on all maps as the property of the **San Francisco Water Department/Hetch Hetchy Regional System (Service of the San Francisco P.U.C.)** It is protected open space with a large fence around it and nasty "no trespassing" signage up and down the Crystal Springs Trail (**San Mateo County Parks**). At the Runnymede intersection, the trail is immediately adjacent to the Raymundo property in question here and runs all the way up the hill right through the watershed land as a fire break and utility road, before it rejoins Raymundo Drive near the Marva Oaks intersection and descends into Huddart Park. The Sand Hill trail (parallel to the freeway I-280) also abuts on this town property. Hikers and horses are frequent users of these trails. Here are two more government agencies that should be consulted about this project. To the west of this San Francisco watershed property is the Pfleger property, acquired by POST several decades ago, and now incorporated into **the Golden Gate National Recreation Area (GGNRA)**. It is presently "off-limits" to trespassers. In short, state, county, city and federal land lies next to or near the Raymundo portion of the proposed Project.

Action Item: As a minimum, this area on the maps needs to be accurately labeled – and these agencies listed among those who would have an interest in what happens to this property. These concerns should be expressly addressed in the EIR; a) the labeling on all the maps should be corrected, and b) the three agencies mentioned above should be added to the list of concerned agencies – and (c) they should be contacted directly – and immediately -- for their written assessments of the proposed Project, in particular the Raymundo part of the Project, which is immediately adjacent to their lands.

- 3. As indicated in the draft ERI, the Woodside General Plan indicates:

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

These goals and policies still represent the thinking of most Woodside residents; they should absolutely not be set aside.

Action item: Vote against changes in the General Plan

Finally, there is the issue of Habitat Connectivity (see 3.3-3 in the EIR). Our area of Woodside is colored shocking pink on these maps, indicating “Conservation planning landscapes.” Multi-family housing is the very antithesis of this. Many people on this street and others have built high fences to keep wildlife off their properties. I, on the other hand, welcome wildlife and have – for purposes of fire prevention, mainly – cleared brush and flammable materials from my acreage, which has at the same time become a wildlife corridor from Huddart Park and Raymundo Drive into the GGNRA and Hetch Hetchy Watershed lands, and via Marva Oaks, into the Runnymede Sculpture garden. This precious access must be preserved at all cost. Changing the zoning of this town-owned parcel at the bottom of Raymundo Drive in order to build urban housing does not lend itself to furthering the preservation of open space in this critical area next to the governmentally-protected wider open spaces that protect our water supply and provide ongoing habitat for our wildlife.

Action item: Protect Habitat Connectivity ; encourage conservation easements (the Town needs to rethink its reluctance to support these).

- 4. Concerning 5.1 in the EIR, re: projected population growth in Woodside from now into 2031.

This chart projects a 19.5% (nearly 20%) growth in the population of Woodside between now and the year 2031.

Such a population increase during Phase 6 would result in the complete destruction of everything Woodside stands for – everything current residents want to protect and everything that new families in town seeking quieter living and rural environments, wildlife, etc., desire when they buy property in the Town of Woodside. Moreover, it would change the voting population and possible outcomes that do not reflect the values we currently relish and uphold, which are embedded in and so well-stated in our General Plan.

The State of California is wrong-headed in its effort to urbanize every single municipal entity in the state. This approach, while perhaps well-meant in the beginning, is completely unacceptable, especially to small rural residential town like ours. "Social Justice" cannot be achieved by fiat – or by building "affordable" apartment complexes on the edge of, or next door to, larger and precious parcels of residential country homes – and wild, open land.

Finally, and not least: the EIR indicates that there is only one school in Woodside. I beg to differ. Woodside High School is also located in Woodside. The school's website provides this address: 3; ; "Ej wtej kndCyg."Y qqf ulf g."EC"; 6284

In Conclusion: I also support the observations made and concerns expressed by Steve Lubin and Kim Hansen, Susan Poletti, and others about this draft EIR. I trust that the Planning Commission and the Town Council members will CAREFULLY study this document and our public comments and reflect on the immense weight of the decisions they are about to make as to our future.

s/Karen Offen

To: Woodside Town Council, Planning Commission; Town Staff, Kevin Bryant and Sage Schaan: and members of the Conservation and Open Space Committee

From: Sue Poletti
421 Raymundo Drive
Woodside, CA
suepolettimac.com

The stated purpose of the EIR is “to balance environmental, economic, and social objectives,” however the selected Raymundo site does not meet this criteria.

B9-1

The project will be butted up against the 280 freeway and have you stopped to consider the amount of noise the inhabitants would be exposed to 24 hours a day?

The Raymundo site is simply at the far end of town, alienating people that you were supposed to incorporate and involve within the town. You were supposed to make them feel welcome, instead you have shoved them to the end of town, out of sight out of mind.

B9-2

It's an hour long walk from the Raymundo site to the town center specifically the local grocery store, elementary school, church, or library. A child walking to and from school would have to allow two hours of time out of their day. Had a site in Town Center been selected, the child would have a 15-minute walk or less to and from school.

The Raymundo site is built next to or on a fault line.

B9-3

The Raymundo site is located in a very high fire district. Most, if not all, of us on Raymundo have lost our fire insurance and are now reliant on the California Fair Plan which does not cover the real cost of property if lost.

B9-4

The Raymundo site coupled with the 773 Cañada and Canada College sites places all the mid and low income projects next-door to one another, creating a ghetto if you will by placing everybody in the same area. These projects were meant to be spread throughout town and meant to be close to the Town Center and Town amenities.

B9-5

We understand that the Town does not currently allow three story buildings in the Town Center. However, if with just a stroke of a pen, it is easy to change the zoning of the Raymundo site from Open Space to Multifamily in order to plan three story buildings on that site, then it should be just as easy with the stroke of a pen to all change a two-story height restriction in Town Center to three stories.

B9-6

Has the fire department been a part of this planning? It is my understanding that our local fire department does not own a firetruck equipped with a ladder that would reach a three-story building. In light of the two apartment fires last week in Redwood City and San Carlos, an apartment fire is something to consider and one which our Town is not equipped to handle.

B9-7

The Conservation and Open Space Committee was not contacted nor aware that Open Space would have to be sacrificed and rezoned for Multi Family zoning.

B9-8

The Raymundo site does nothing in the way of helping the existing homeowners living on Raymundo and Marva Oaks. In fact, building three-story apartment buildings at the corner of Raymundo and Runnymede is a detriment to the people living on Raymundo and Marva Oaks. In a wildfire, those trying to evacuate with trucks and horse trailers will most certainly find themselves stopped at a choke point as the apartment dwellers also try to evacuate at the same time. There is only one way in and one way out for

B9-9

the homeowners living on Raymundo and Marva Oaks. There is no second escape route. To jeopardize their lives and their safety is unconscionable.

Runnymede and Raymundo are home to horse trails that are well ridden on a daily basis. To jeopardize the safety of horseback riders especially along Runnymede is also unconscionable. More traffic along Runnymede and Raymundo is a horse accident and lawsuit just waiting to happen.

B9-10

For many decades, the Town of Woodside upheld its scenic corridor, rules and regulations. Often the scenic corridor rules and regulations were punitive to folks who wanted a lovely entrance gate or a certain aesthetic at their home. Now with a stroke of a pen and at the whim of the Planning Commission, the scenic rules and regulations will be thrown out, totally ignored, and three-story apartments located within short setbacks, and located right on the scenic corridor will be allowable. To heck with the rules, you might as well completely eliminate the scenic corridor guidelines for all future projects for the sake of equal treatment.

B9-11

The Woodside General Plan states the following:

B9-12

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

For decades, Town Council Members, Planning Commissioners, Environmental Committees, among others, have dedicated their time and effort to keep Woodside rural. To add three story apartment buildings on the Raymundo site goes against everything Woodside has fought to preserve. Don't we have a say in how we want our Town to look and feel? After all, the rural nature of our Town is the reason most of us chose to move here. To destroy our Town by urbanization, to obliterate Open Space for high density apartment buildings, is not what we want. The one size fit all mandate of the State is just not right. Everyone, including the State, knows it is not right, because it requires the use of FORCE by unconstitutional fines to implement. If it were such a good idea, why would the State have to use force?

Sage Schaan

From: chris romano <four.hooves@sbcglobal.net>
Sent: Sunday, June 16, 2024 7:00 PM
To: Sage Schaan
Cc: Council Members
Subject: EIR Housing Element Comment

Dear Sage Schaan and Town Council Members,

Thank you for the opportunity to comment on the EIR Housing Element as it applies to 773 Canada Rd.

If the property is to be rezoned for 20 units on 1.75 acres, then it would be good if the balance of the land be dedicated for open space. The land could then be enjoyed by those living in the 20 units and, if there were trail connectors to Glen Creg and West Maple roads, the community would benefit. The views from the upper property are lovely.

Thank you for reviewing my comments.

Most Sincerely,
Christina Romano
521 Rocky Way

B10-1

Sage Schaan

From: Stephan Thomsen <stephan@thomsen.com>
Sent: Monday, June 17, 2024 11:50 PM
To: Sage Schaan
Subject: Comments on Environmental Impact Report for the Housing Element

Hi Sage,

I'm writing to share some of my comments on the Environmental Impact Report (EIR) for the Housing Element.

B11-1

I have many concerns that are not adequately addressed by this report or in Woodside's plan for the Housing Element.

However, I will focus on four key concerns relating to the proposed site at the intersection of Runnymede Rd and Raymundo Dr:

1. Wildfire safety and evacuation
2. Inadequate parking and increase in traffic on Runnymede Rd
3. Lack of viable public transportation
4. Negative impact to scenic corridor and untenable noise levels for future residents due to proximity to highway 280

Wildfire safety and evacuation

B11-2

Although the EIR acknowledges the presence of high fire hazard severity zones (VHFHSZ) in Woodside and outlines compliance with general fire protection standards and evacuation plans, it lacks detailed, site-specific strategies for the Raymundo site. The EIR mentions adherence to California Building and Fire Codes, including vegetation management and road width requirements for fire apparatus access, but does not provide a thorough analysis of the unique risks and necessary evacuation routes for the proposed three-story multi-unit dwelling. The report defers to general measures and future site-specific reviews, leaving a critical gap in safety assurances for the Raymundo site.

Will there be adequate space for fire department vehicles to turn around at the site? I'm told that the Woodside Fire Protection district does not have a truck that can service 3-story buildings? What will be done in the event of an emergency at this site?

I estimate that we could have as many as 60 residents living at this site. Safe emergency evacuation for those residents and for the residents of Raymundo and Marva Oaks up the hill is a serious concern that is not adequately addressed.

Inadequate parking and increased in traffic on Runnymede Rd

B11-3

The EIR makes no mention of the plan to accommodate vehicle parking for a new residents. Sixty residents could easily result in a parking space requirement for 25 cars or more. Where will these cars park? On the town-owned site for the new building? On Runnymede?

The EIR mentions a projected increase in traffic of 36.7%. We already have traffic problems on Runnymede with people driving excessive speeds. How is any of this consistent with the stated objectives for preserving the rural character of Woodside?

Lack of viable public transportation:

B11-4

The EIR mentions SamTrans Route 278, which has a stop at Canada College. That stop is 2.5 miles from the proposed building site. How is this a viable solution for low income families who may not have their own vehicles? Even if there were a new bus stop at the intersection of Runnymede and Cañada Rd, the walking distance to that location is nearly one mile. There is not adequate space for public busses to drive down Runnymede.

Negative impact to scenic corridor and noise for future residents due to proximity to high 280

B11-5

The proposed Raymundo site would be visible from highway 280 and would have a significant visually detrimental impact on the natural beauty of this section of 280, which is designated a scenic corridor, both during daytime and at night due to light pollution. Conversely, the proposed building site is very close to highway 280. Freeway noise for future residents so close to 280 would be untenable. The decibel readings in the EIR are low? What time of day were they taken? It is impossible to have a conversation at that site mid-morning using a normal voice. Would a sound barrier be required to make the location reasonably habitable? What would the additional visual impact be of such a sound barrier?

In my opinion underlying goal of the housing element is to provide lower income families and individuals with not only affordable, but also practical and desirable locations to live. The Raymundo site will fall short of that goal for the reasons I've mentioned above.

Please share my comments as appropriate.

Best regards,

Stephan Thomsen
221 Raymundo Dr
415-577-8392

Jenine Alftin
173 Raymundo Drive
Woodside, CA 94062

June 17, 2024

Sarah Harper
Town of Woodside

Re: Planning Commission Meeting, June 26, 2024

Dear Ms. Harper,

I am writing to express my strong opposition to the proposed amendment of the Zoning Map designation for Assessor Parcel Number (APN) 072-041-040 (Raymundo Drive) from Open Space (OS) to Multi-family. While there are numerous reasons for my opposition, I wish to focus specifically on the issue of sewer infrastructure in this letter.

The draft Environmental Impact Report (EIR) fails to accurately describe the situation or the potential impacts of constructing waste management facilities at the Raymundo location, particularly in Section 3.9. Despite repeated controversy surrounding sewer access (notably omitted in Section 1.2 Utilities), the addition of sewer lines has not been adequately addressed or considered in terms of the environmental and economic challenges it poses to introducing high-density housing to Raymundo Drive.

Currently, there is no existing sewer infrastructure at the Raymundo location. The proposal to install a medium sewer main with a 24-inch pipe along Runnymede Road, which serves as the sole access route to our homes, would incur extensive costs for repaving and could potentially disrupt our community and put our safety at risk in case of an emergency evacuation. Additionally, the necessary addition of water mains, PG&E lines, and internet infrastructure further compounds these challenges.

The construction of new sewer lines spanning approximately half to two-thirds of a mile along Runnymede Road would have significant environmental impacts, cause disruptions, and impose substantial economic costs. While the EIR indicates existing wastewater treatment capacity, it fails to address the critical need for infrastructure that currently does not exist.

The financial burden of these necessary sewer constructions is estimated to be between \$2-3 million. Moreover, recent discussions at town council meetings indicate that sewer rates in Woodside are already rising. Furthermore, the seismic vulnerability of the proposed waste lines raises additional concerns.

B12-1

B12-2

B12-3

B12-4

B12-5

Several questions remain unanswered:

- What is the actual cost?
- Are there estimates to install a sewer?
- Who will be responsible for the cost to install and maintain the sewer?
- Has there been an environmental report on the impact of installing a sewer?
- Where is the analysis of these findings?

B12-6

It would be premature to vote in favor of amending the zoning code without a complete analysis of cost, impact, and fiscal responsibility.

If this EIR sets a precedent for future projects, it is crucial that the environmental and financial implications of infrastructure construction are not overlooked, nor should existing residents be unfairly burdened with these exorbitant costs due to a sub-par building site that was decided upon using insufficient information.

In conclusion, I urge the members of the Planning Commission to consider the serious implications of the proposed zoning amendment on our community, particularly regarding sewer infrastructure. I respectfully request that these concerns be thoroughly addressed before any decisions are made regarding the future development of Raymundo Drive.

I urge the Planning Commission to make a recommendation to the Town Council to reject the Final EIR and to deny the entitlements outlined in the project description.

Thank you for considering my viewpoint on this matter. I look forward to your response.

Sincerely,
Jenine Alftin

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2.2 Responses to Comments

As described above, this chapter includes responses to comments on environmental issues raised in the comment letters. Responses to written comments received during the public review are summarized in **Table 2-2** below. The reference number and text of the comments are presented alongside the response for ease of reference. Where the same comment has been made more than once, a response may direct the reader to another numbered comment and response.

Responses focus on comments that raise important environmental issues or pertain to the adequacy of analysis in the Draft EIR or to other aspects pertinent to the potential effects of the Proposed Project on the environment pursuant to CEQA. Comments that address policy issues, opinions, or other topics beyond the purview of the Draft EIR or CEQA are noted as such for the public record. Where comments are on the merits of the Proposed Project rather than on the Draft EIR, these are also noted in the responses.

Where appropriate, the information and/or revisions suggested in the comment letters have been incorporated into the Final EIR. Where such revisions are warranted in response to comments on the Draft EIR, deletions are shown in ~~strike through~~ and additions are shown underlined in red in the matrix of comments and responses.

Table 2-2: Responses to Comments Received on the Draft EIR

Letter	Commenter	Date	Comment	Response
A1-1	California Department of Fish & Wildlife	6/13/24	<p>The California Department of Fish and Wildlife (CDFW) has reviewed the Town of Woodside (Town) Draft Environmental Impact Report (EIR) for the Town of Woodside Housing Element Update (Project) pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.</p> <p>Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect fish and wildlife resources of the State. Please be advised, by law, CDFW may be required to carry out or approve aspects of the Project through the exercise of its own regulatory authority under the Fish and Game Code.</p> <p>CDFW ROLE</p> <p>CDFW is California’s Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (Id., § 1802). For purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.</p> <p>CDFW is also submitting comments as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority over the Project pursuant to the Fish and Game Code. For example, the Project may be subject to CDFW’s Lake and Streambed Alteration (LSA) regulatory authority, if the Project impacts the bed, channel or bank of</p>	<p>Thank you for your letter. The comment presents background information and is not related to the adequacy of the DEIR; thus, no further response is required.</p>

Letter	Commenter	Date	Comment	Response
			any river, stream or lake within the State (Fish & G. Code, § 1600 et seq.). Likewise, to the extent the Project may result in “take” as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.	
A1-2	California Department of Fish & Wildlife	6/13/24	<p>REGULATORY REQUIREMENTS</p> <p>California Endangered Species Act</p> <p>A CESA Incidental Take Permit (ITP) must be obtained from CDFW if the Project has the potential to result in “take” of plants or animals listed under CESA, either during construction or over the life of the Project. Under CESA, “take” means “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill.” (Fish & G. Code, § 86). CDFW’s issuance of an ITP is subject to CEQA and to facilitate permit issuance, any project modifications and mitigation measures must be incorporated into the CEQA document analysis, discussion, and mitigation monitoring and reporting program. If the Project will impact CESA listed species, early consultation is encouraged, as significant modification to the Project and mitigation measures may be required in order to obtain a CESA Permit.</p> <p>CEQA requires a mandatory finding of significance if a project is likely to substantially impact threatened or endangered species. Pub. Resources Code, §§ 21001, subd. (c) & 21083; CEQA Guidelines, §§ 15380, 15064 & 15065.) In addition, pursuant to CEQA, the Lead Agency cannot approve a project unless all impacts to the environment are avoided or mitigated to less-than-significant levels, or the Lead Agency makes and supports Findings of Overriding Consideration (FOC) for impacts that remain significant despite the implementation of all feasible mitigation. FOC under CEQA, however, do not eliminate the Project proponent’s obligation to comply with the Fish and Game Code.</p>	The comment presents background information and is not related to the adequacy of the DEIR; thus, no further response is required.

Letter	Commenter	Date	Comment	Response
A1-3	California Department of Fish & Wildlife	6/13/24	<p>Lake and Streambed Alteration</p> <p>CDFW requires an LSA Notification, pursuant to Fish and Game Code section 1600 et seq., for Project activities affecting river, lakes or streams and associated riparian habitat. The draft EIR identifies that the Project location contains stream corridors, floodplains, and riparian habitat that could be impacted by the Project (p. 3.3-7). Notification is required for any activity that may substantially divert or obstruct the natural flow; change or use material from the bed, channel, or bank (including associated riparian or wetland resources); or deposit or dispose of material where it may pass into a river, lake, or stream. Work within ephemeral streams, drainage ditches, washes, watercourses with a subsurface flow, and floodplains is generally subject to notification requirements. In addition, infrastructure installed beneath such aquatic features, such as through hydraulic directional drilling, is also generally subject to notification requirements. Therefore, any impact to the mainstems, tributaries, or floodplains or associated riparian habitat caused by the proposed Project will likely require an LSA Notification. CDFW may not execute a final LSA Agreement until it has considered the final EIR and complied with its responsibilities as a responsible agency under CEQA.</p>	The comment presents background information and is not related to the adequacy of the DEIR; thus, no further response is required.
A1-4	California Department of Fish & Wildlife	6/13/24	<p>Migratory Birds and Raptors</p> <p>CDFW has authority over actions that may result in the disturbance or destruction of active bird nest sites or the unauthorized take of birds. Fish and Game Code sections protecting birds, their eggs, and nests include section 3503 (regarding unlawful take, possession, or needless destruction of the nests or eggs of any bird), section 3503.5 (regarding the take, possession, or destruction of any birds-of-prey or their nests or eggs), and section 3513 (regarding unlawful take of any migratory nongame bird). Migratory birds are also protected under the federal Migratory Bird Treaty Act.</p>	The comment presents background information and is not related to the adequacy of the DEIR; thus, no further response is required.

Letter	Commenter	Date	Comment	Response
A1-5	California Department of Fish & Wildlife	6/13/24	<p>PROJECT DESCRIPTION AND LOCATION SUMMARY</p> <p>Proponent: Town of Woodside</p> <p>Objective: The objective of the Project is to amend the Town’s General Plan Housing Element to demonstrate the capacity to permit “...up to 423 new housing units...” in the Town to comply with state law (draft EIR 2024, p. ES-3). The Project proposes to promote the development of a variety of residential housing types, specifically to focus on “smaller scale infill development” within mostly existing residential neighborhoods, including some higher density multifamily type housing and accessory dwelling units (ADUs) (draft EIR 2024, E-3). The infill alternative proposes a focus on new higher density housing including 29 multifamily type housing units at the Town Center area and 15 at the Skylonda Center area for a total of 303 new units. Additionally, the Project proposes the infill alternative option will result in 120 new ADU type housing units (draft EIR 2024).</p> <p>Location: Town of Woodside, townwide</p> <p>Timeframe: 2023-2031</p>	<p>The comment presents background information and is not related to the adequacy of the DEIR; thus, no further response is required.</p>
A1-6	California Department of Fish & Wildlife	6/13/24	<p>COMMENTS AND RECOMMENDATIONS</p> <p>CDFW offers the comments and recommendations below to assist the Town in adequately identifying and/or mitigating the Project’s significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Based on the Project’s avoidance of significant impacts on biological resources with implementation of mitigation measures, including those recommended by CDFW below, CDFW concludes that a Program EIR is appropriate for the Project.</p> <p>COMMENT 1: Mitigation Measures</p> <p>Issue, specific impacts, why they may occur and be potentially significant:</p>	<p>The Project-Level Analysis checklist has been added as Appendix H of the DEIR. The addition of this Checklist clarifies how mitigation measures will be implemented and monitored but does not constitute significant new information requiring recirculation pursuant to CEQA Guidelines section 15088.5.</p> <p>In reference to Appendix H, the following edits have been made:</p> <p>DEIR p. 3.3-18: "In addition, individual developments</p>

Letter	Commenter	Date	Comment	Response
A1-7	California Department of Fish & Wildlife	6/13/24	<p>The draft EIR does not provide a mitigation checklist or procedure for evaluating subsequent Project impacts. Therefore, it is unclear if implementation of MM-BIO-1 through MM-BIO-10 would reduce impacts to less-than-significant or if subsequent environmental review would be required. The draft EIR found that at least 36 special- status species have the potential to occur in the Planning Area (Tables 3.3-1 and 3.3-2, pp.3.3-3 - 3.3-4), that “a range of special-status species have been documented in and around the Planning Area” (p. 3.3-16), and “...given the extent of biological resources that exist in the Planning Area, the potential for impacts to some particular special-status species remains” (p. 3.3-18). The draft EIR identifies that development facilitated by the Project could have a substantial adverse effect, either directly or through habitat modifications, on candidate, sensitive, or special-status species. The draft EIR acknowledges that significant impacts both direct and indirect may result in significant impacts, “take”, and/or habitat degradation (p. 3.3-18). To address the foreseeable potential impacts to less-than-significant, the draft EIR states that the “Mitigation Measures” (MM-BIO-1 – MM-BIO-10) will reduce potential impacts to fish, wildlife, and sensitive and critical habitats (p. 3.3-18).</p> <p>Recommendations to reduce impacts to less-than-significant: The draft EIR should include a mitigation checklist and procedure for evaluating subsequent Project impacts. The procedure should include an evaluation of habitat and species occurrences based on a current habitat assessment and species data. The procedure should also include consultation with CDFW when threatened, endangered or fully protected species are present or have the potential to be present.</p> <p>COMMENT 2: Roosting Bats Issue: Mitigation Measure BIO-4 (Disturbance to Bat Species) allows deferred and undefined mitigation measures. The</p>	<p><u>pursuant to the Proposed Project are required to complete a Project-Specific Analysis (PSA) checklist, located in Appendix H of the DEIR, to determine whether the development qualifies as within the scope of this DEIR or requires additional environmental documentation or its own independent environmental review. Such evaluations will ascertain whether the development project’s effects on the environment were covered in the DEIR.</u>”</p> <p>The following clarification has been to Mitigation Measure BIO-4:</p>

Letter	Commenter	Date	Comment	Response
			<p>measure does not include post-construction/post-development monitoring to ensure mitigation was adequate and successful. The draft EIR states: “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...” (p. 3.3-21).</p> <p>There are 25 known bat species in California, such as the little brown bat (<i>Myotis lucifugus</i>), the Mexican free-tailed bat (<i>Tadarida brasiliensis</i>), the hoary bat (<i>Lasiurus cinereus</i>), and California’s state bat the pallid bat (<i>Antrozous pallidus</i>), a CDFW species of special concern (CDFW 2024, SSC). Bat maternity season varies across species, location, regional climate, and weather patterns, therefore defining maternity roosting season as April 1 – August 31 and requiring surveys only during this timeframe may be inadequate to identify bat maternity roosting sites present in a proposed development area (Caltrans Bat Mitigation 2019).</p> <p>Recommendations to reduce impacts to less-than-significant: CDFW recommends the draft EIR require a developer to use a qualified biologist² to survey (year round) all proposed development areas for evidence of bat roosts where there is suitable habitat present within 200 feet of the disturbance area, including: culverts, snags, attics, warehouses, outbuildings, barns, siding or roofs of houses and other buildings, bridges, parking garages, woodpiles, trees, bat houses, caves, mines, talus, and cliff and rock crevices.</p> <p>Recommended Mitigation Measure BIO-4B (Bat Protection): If surveys identify a bat maternity roost or potential bat maternity roost that cannot be avoided then a bat maternity roost mitigation plan shall be developed prior to removal of roosts habitat. The plan shall, at a minimum: 1) Require a maternity roost replacement ratio of 2:1; 2) Success criteria based on roost occupancy; 3) A five-year post-development</p>	<p>DEIR p. 3.3-20: Disturbance to Bat Species. If required pursuant to pre-construction surveys <u>In areas where there is suitable habitat present within 200 feet of the disturbance area, including: culverts, snags, attics, warehouses, outbuildings, barns, siding or roofs of houses and other buildings, bridges, parking garages, woodpiles, trees, bat houses, caves, mines, talus, and cliff and rock crevices</u>, a qualified biologist paid for and hired by the applicant shall conduct preconstruction surveys for <u>evidence of bat roosts</u>, 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.</p>

Letter	Commenter	Date	Comment	Response
			<p>monitoring program. The post-development monitoring program should include the following elements contained in the Caltrans Bat Mitigation 2019, https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/caltrans-bat-mitigation-guide-a11y.pdf.</p> <ul style="list-style-type: none"> • Quantification of the average number of bats present by species and season; • Comparison of replacement habitat within a structure if placement varies, or if more than one habitat type, such as hanging boxes, is provided; and • Long-term temperature monitoring from a subsample of replacement habitat features with temperature data loggers. Wireless data loggers can be used to limit the disturbance to roosting bats” (p. 7-20). 	<p>a) Trees, snags, and buildings may be removed outside of the maternity roosting season without performing preconstruction bat surveys.</p> <p>b) Felled trees shall remain on the ground for 24 hours prior to being removed or chipped.</p> <p>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.</p> <p>d) If an <u>surveys</u> identified a <u>bat maternity roost</u> or <u>potential bat maternity roost that cannot be avoided</u> location is removed, a <u>bat maternity species and roost appropriate mitigation plan</u> shall be developed <u>prior to removal of roost habitat</u> in consultation with CDFW. The mitigation <u>plan</u> shall include at minimum <u>(i) the replacement of a suitable roost at a ratio of 2:1 (ii) success criteria based on roost occupancy; (iii) A five-year post-development monitoring program</u></p>

Letter	Commenter	Date	Comment	Response
				<p><u>with the following elements contained in the Caltrans Bat Mitigation Guide 2019:</u></p> <ul style="list-style-type: none"> • <u>Quantification of the average number of bats present by species and season;</u> • <u>Comparison of replacement habitat within a structure if placement varies, or if more than one habitat type, such as hanging boxes, is provided; and</u> • <u>Long-term temperature monitoring from a subsample of replacement habitat features with temperature data loggers. Wireless data loggers can be used to limit the disturbance to roosting bats.</u> structure within or immediately adjacent to the project site, such that similar structure shape and thermal properties are met with the replacement roost <p>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</p>

Letter	Commenter	Date	Comment	Response
				<p>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).</p> <p>This revision to a mitigation measure already required in the EIR does not constitute significant new information requiring recirculation pursuant to CEQA Guidelines section 15088.5.</p>
A1-8	California Department of Fish & Wildlife	6/13/24	<p>COMMENT 3: Bumble Bees</p> <p>Issue: Mitigation Measure BIO-5 (Disturbance to Bumble Bee Species) is inadequate to reduce potential direct and indirect impacts to candidate bumble bee species to less-than-significant. Mitigation Measure BIO-5 states that the Project proponent “shall conduct a take avoidance survey for active special-status bumble bee [such as Crotch’s bumble bee (<i>Bombus crotchii</i>)] colony nesting sites in any previously undisturbed [emphasis CDFW] area[s]...” (3.3-21). Solely conducting surveys for bumble bee nests and restricting avoidance surveys to “undisturbed” areas is too narrow a condition to reduce potential direct and indirect impacts to candidate bumble bee species to less-than-significant. Additionally, Crotch’s bumble bee is currently a Candidate Endangered species under CESA and as a candidate species, unauthorized take of this species pursuant to CESA is a violation of California Fish and Game Code section 2080 et seq.</p> <p>Recommended Potentially Feasible Mitigation Measures to reduce impacts to less-than-significant or to minimize significant impacts:</p>	<p>The following minor addition/revision has been to Mitigation Measure BIO-5:</p> <p>DEIR p. 3.3-21: 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</p>

Letter	Commenter	Date	Comment	Response
			<p>CDFW recommends including the following mitigation measures for Crotch’s bumble bee:</p> <p>Mitigation Measure #1: Habitat Assessment: A habitat assessment shall be conducted prior to subsequent project construction.</p> <p>The habitat assessment should be conducted by a qualified entomologist knowledgeable with the life history and ecological requirements of Crotch’s bumble bee. The habitat assessment should include all suitable nesting, overwintering, and foraging habitats within the Project area and surrounding areas. Potential nest habitat (February through October) could include that of other Bombus species such as bare ground, thatched grasses, abandoned rodent burrows or bird nests, brush piles, rock piles, and fallen logs. Overwintering habitat (November through January) could include that of other Bombus species such as soft and disturbed soil or under leaf litter or other debris. The habitat assessment should be conducted during peak bloom period for floral resources on which Crotch’s bumble bee feed. Further guidance on habitat surveys can be found within Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species (https://wildlife.ca.gov/Conservation/CESA).</p> <p>Mitigation Measure #2: Survey Plan: If Crotch’s bumble bee habitat is present within the Project area, the subsequent project shall include a pre-construction survey plan. The survey plan should be submitted to CDFW for review. Surveys should be conducted by a qualified entomologist familiar with the behavior and life history of Crotch’s bumble bee. If CESA candidate bumble bees will be captured or handled, surveyors should obtain a 2081(a) Memorandum of Understanding (MOU) from CDFW.</p> <p>Surveys shall be conducted during the colony active period (i.e. April through August) and when floral resources are in</p>	<p>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><u>Additionally, in areas where historical and current occurrence data indicate the presence of Crotch’s bumble bee, the following requirements shall apply:</u></p> <ul style="list-style-type: none"> <u>A habitat assessment shall be conducted prior to subsequent project construction pursuant to guidance contain in Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species. The habitat assessment should be conducted by a qualified entomologist knowledgeable with the life history and ecological requirements of Crotch’s bumble bee. The habitat assessment should include all suitable nesting, overwintering, and foraging</u>

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			<p>peak bloom. Bumble bees move nests sites each year, therefore, surveys should be conducted each year that Project work activities will occur.</p> <p>Further guidance on presence surveys can be found within Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species (https://wildlife.ca.gov/Conservation/CESA).</p> <p>Mitigation Measure #3: Crotch’s Bumble Bee Avoidance or Take Authorization: If Crotch’s bumble bee are detected during pre-construction surveys, a Crotch’s bumble bee avoidance plan shall be developed and provided to CDFW for review prior to work activities involving ground disturbance or vegetation removal.</p> <p>If full take avoidance is not feasible, the subsequent project shall apply to CDFW for take authorization under an ITP.</p>	<p><u>habitats within the project area and surrounding areas. Potential nest habitat (February through October) could include that of other Bombus species such as bare ground, thatched grasses, abandoned rodent burrows or bird nests, brush piles, rock piles, and fallen logs. Overwintering habitat (November through January) could include that of other Bombus species such as soft and disturbed soil or under leaf litter or other debris. The habitat assessment should be conducted during peak bloom period for floral resources on which Crotch’s bumble bee feed.</u></p> <ul style="list-style-type: none"> • <u>If Crotch’s bumble bee habitat is present within the project area, the subsequent project shall include a pre-construction survey plan. The survey plan should be submitted to CDFW for review. Surveys should be conducted by a qualified entomologist familiar with the behavior and life history of Crotch’s bumble bee. If CESA candidate bumble bees will be captured or handled, surveyors should obtain a 2081(a) Memorandum of Understanding (MOU) from CDFW. Surveys shall be conducted during the colony active period (i.e. April through August) and when floral resources are in peak bloom. Bumble bees move nests sites each</u>

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				<p><u>year, therefore, surveys should be conducted each year that project work activities will occur.</u></p> <ul style="list-style-type: none"> • <u>If Crotch’s bumble bee are detected during pre-construction surveys, a Crotch’s bumble bee avoidance plan shall be developed and provided to CDFW for review prior to work activities involving ground disturbance or vegetation removal. If full take avoidance is not feasible, the subsequent project shall apply to CDFW for take authorization under an ITP.</u> <p>This revision to a mitigation measure already required in the EIR does not constitute significant new information requiring recirculation pursuant to CEQA Guidelines section 15088.5.</p>
A1-9	California Department of Fish & Wildlife	6/13/24	<p>COMMENT 4: Amphibians</p> <p>Issue: Foothill yellow-legged frog population 4 (Rana boylei pop 4) has the potential to occur within the Project area and is an Endangered species under CESA. Unauthorized take of this species pursuant to CESA is a violation of California Fish and Game Code section 2080 et seq.</p> <p>Recommendations to reduce impacts to less-than-significant: Update Mitigation Measure BIO-6 to include a provision that if Foothill yellow-legged frog cannot be avoided then a CESA ITP shall be obtained by the subsequent project prior to take occurring.</p>	<p>The following minor addition/revision has been to Mitigation Measure BIO-6:</p> <p>DEIR p. 3.3-22: Disturbance to Foothill Yellow-Legged Frog (FYLF) and California Red-Legged Frog (CRLF).</p> <ul style="list-style-type: none"> i) <u>If the FYLF cannot be avoided then a CESA ITP shall be obtained by the subsequent project prior to take occurring.</u> <p>This revision to a mitigation measure already required in the EIR does not constitute significant new information requiring</p>

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A1-10	California Department of Fish & Wildlife	6/13/24	<p>COMMENT 5: Special-status Small Mammals</p> <p>Mitigation Measure BIO-10 (Disturbance to Santa Cruz Kangaroo Rat and San Francisco Dusky-Footed Woodrat) states a preconstruction survey will be conducted “...within 30 days of the start of work activities.” As proposed, the preconstruction survey may not detect individuals and nests within the disturbance zone. Establishment of 10-foot buffers may not be sufficient to reduce impacts to less-than-significant.</p> <p>Recommendations to reduce impacts to less-than-significant: The draft EIR should update preconstruction survey measure(s) for San Francisco dusky-footed woodrat (<i>Neotoma fuscipes annectens</i>) midden and Santa Cruz kangaroo rat (<i>Dipodomys venustus venustus</i>) nests to identify surveys will be conducted within the Project footprint and a 50-foot buffer of the Project. Surveys should be conducted by a qualified biologist at least two weeks prior to the start of any ground-disturbing activities. In the event a San Francisco dusky-footed woodrat midden or Santa Cruz kangaroo rat nest is found in the proposed development area, the developer/Project proponent shall submit results of surveys to CDFW. Surveys results shall include locations of any detected middens or nests, sighted individuals or carcasses on a base map or maps. Maps shall include aerial imagery of the work site, predicted disturbed areas and protective buffer distances. The map or maps shall use an appropriate scale to depict an individual midden and/or nest sites.</p>	<p>recirculation pursuant to CEQA Guidelines section 15088.5.</p> <p>The following minor addition/revision has been to Mitigation Measure BIO-10:</p> <p>DEIR p. 3.3-22: 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 <u>at least two weeks prior to within 30 days of the start of work any ground-disturbing activities. In the event a San Francisco dusky-footed woodrat midden or Santa Cruz kangaroo rat nest is found in the proposed development area, the developer/Project proponent shall submit results of surveys to CDFW. Surveys results shall include locations of any detected middens or nests, sighted individuals or carcasses on a base map or maps. Maps shall include aerial imagery of the work site, predicted disturbed areas and protective buffer distances. The map or maps shall use an appropriate scale to depict an individual midden and/or nest sites.</u></p> <p>If active nests are determined to be present in, or within 10 <u>50</u> feet of, the impact <u>project</u> area, the following measures will be implemented, as appropriate.</p> <p>a) Active nests that are detected within the work areas will be</p>

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				<p>avoided to the extent feasible. Ideally, a minimum ± 50-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.</p> <p>b) If avoidance of active nests within and immediately adjacent to (within ± 50 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>This revision to a mitigation measure already required in the EIR does not constitute significant new information requiring recirculation pursuant to CEQA Guidelines section 15088.5.</p>
A1-11	California Department of Fish & Wildlife	6/13/24	<p>COMMENT 6: Fully Protected Species: San Fransico Garter Snake</p> <p>Issue: San Francisco garter snake (<i>Thamnophis sirtalis tetrataenia</i>) has potential to occur within the Project area and is a state fully protected species. CDFW has jurisdiction over fully protected species of birds, mammals, amphibians, reptiles, and fish pursuant to Fish and Game Code §§ 3511, 4700, 5050, and 5515. Take of any fully protected species is prohibited. CDFW cannot authorize incidental take of fully protected species unless the take is for scientific purposes</p>	<p>The following minor addition/revision has been to Mitigation Measure BIO-7:</p> <p>DEIR p. 3.3-23: 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</p>

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			<p>pursuant to Fish and Game Code Section 2081(a) or a project has an approved Natural Communities Conservation Plan pursuant to Fish and Game Code Section 2800.</p> <p>Recommendations to reduce impacts to less-than-significant: CDFW recommends the draft EIR update MM-BIO-7 to include a condition avoid construction activities in all areas where a qualified biologist determines San Francisco garter snake is present.</p>	<p>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. <u>Construction activities shall be avoided in all areas where a qualified biologist determines San Francisco garter snake is present.</u> 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>This revision to a mitigation measure already required in the EIR does not constitute significant new information requiring recirculation pursuant to CEQA Guidelines section 15088.5.</p>
A1-12	California Department of Fish & Wildlife	6/13/24	<p>ENVIRONMENTAL DATA</p> <p>CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to prepare subsequent CEQA documents or to make supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (d) & (e)). Accordingly, please report any special-status species and natural communities detected during Project surveys to the CNDDDB. The CNDDDB field survey form can be filled out and submitted online here: https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data. The types of information reported to CNDDDB can be found here:</p>	<p>The comment presents background information and is not related to the adequacy of the DEIR; thus, no further response is required.</p>

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			<p>https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals.</p> <p>ENVIRONMENTAL DOCUMENT FILING FEES</p> <p>CDFW anticipates that the proposed Project, will have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (See: Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.).</p> <p>CONCLUSION</p> <p>CDFW appreciates the opportunity to comment on the draft EIR in order to assist the Town of Woodside in identifying and mitigating Project impacts on biological resources.</p> <p>Questions regarding this letter or further coordination should be directed to Jason Teichman, Environmental Scientist at 707-210-5104 or Jason.Teichman@wildlife.ca.gov; or Wesley Stokes, Senior Environmental Scientist, (Supervisory), at 707-944-5554 or Wesley.Stokes@wildlife.ca.gov.</p>	
A2-1	California Department of Transportation	6/17/24	<p>Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Town of Woodside Housing Element Update. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities. The following comments are based on our review of the May 2024 DEIR.</p> <p>Please note this correspondence does not indicate an official position by Caltrans on this project and is for informational purposes only.</p>	Thank you for your letter. The comment presents background information and is not related to the adequacy of the DEIR; thus, no further response is required.

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			Project Understanding 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 8-year planning period that runs from 2023 through 2031.	
A2-2	California Department of Transportation	6/17/24	<p>Travel Demand Analysis</p> <p>The project vehicle miles traveled (VMT) analysis and significance determination are undertaken in a manner consistent with the Office of Planning and Research’s (OPR) Technical Advisory. Per the DEIR, this project is found to have significant and unavoidable VMT impacts. Caltrans commends the lead agency for implementing trip reduction measures from the California Air Pollution Control Officers Association (CAPCOA) Handbook to reduce VMT.</p> <p>The proposed mitigation measure MM-TRANS-1 should be documented with annual monitoring reports to demonstrate effectiveness.</p>	Thank you for the comment. The Town notes that the annual General Plan report provides an opportunity to report on implementation and effectiveness of measures to reduce VMT.
A2-3	California Department of Transportation	6/17/24	<p>Multimodal Transportation Planning</p> <p>Please review and include the reference to the Caltrans District 4 Pedestrian Plan (2021) and the Caltrans District 4 Bike Plan (2018) in the DEIR. These two plans studied existing conditions for walking and biking along and across the State Transportation Network (STN) in the nine-county Bay Area and developed a list of location-based and prioritized needs.</p> <p>Please note that any Complete Streets reference should be updated to reflect Caltrans Director’s Policy 37 (link) that highlights the importance of addressing the needs of non-motorists and prioritizing space-efficient forms of mobility, while also facilitating goods movement in a manner with the least environmental and social impacts. This supersedes</p>	<p>The comment does not identify a deficiency with the EIR analysis, but rather provides suggestions for future planning. The Town will consider such suggestions in planning and Capital Improvement Program efforts.</p> <p>Additionally, the following information is hereby incorporated into the DEIR to clarify and amplify the description of the regulatory framework:</p> <p>DEIR p. 3.7-5: <u>Caltrans District 4 Bike Plan for the San Francisco Bay Area (2018)</u> <u>The Caltrans District 4 Bike Plan (Plan) identifies infrastructure improvements that</u></p>

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			<p>Deputy Directive 64-R1, and further builds upon its goals of focusing on the movement of people and goods.</p> <p>To improve the multimodal transportation system and better accommodate future land use developments, please consider the following suggestions:</p> <ul style="list-style-type: none"> • Caltrans District 4 Bicycle Plan recommends shoulder improvements on State Route (SR)-84 Woodside Road beginning from the west side of Lindenbrook Road to the intersection of SR-84 La Honda Road and SR-35 Skyline Boulevard. • Caltrans District 4 Bicycle Plan recommends improvements on the uncontrolled intersections of SR-84 La Honda Road and SR-35 Skyline Boulevard, and SR-84 Woodside Road to Canada Road. • Please include high-visibility pedestrian crosswalks in all future restriping projects and increase the number of "YIELD TO PEDS" signs at uncontrolled intersections throughout the Town. • Please provide both short-term bike parking and long-term secure bike parking for residents in the new proposed developments. 	<p>can enhance bicycle safety and mobility throughout District 4 and remove some of the barriers to bicycling in the region. The Plan was developed in cooperation with local and regional partners to ensure that the improvements on the State highway system complement proposals for local networks.</p> <p>District 4 Pedestrian Plan for the Bay Area (2021)</p> <p>This Plan implements the Vision Statement and Goals in Toward an Active California, the statewide bicycle and pedestrian plan, and is part of a comprehensive planning process to identify locations with bicycle and pedestrian needs in each Caltrans district across California. Needs identified in this Plan will inform future investments on the SHS by Caltrans and local partners.</p> <p>This addition to the Regulatory Setting does not constitute significant new information requiring recirculation pursuant to CEQA Guidelines section 15088.5.</p>
A2-4	California Department of Transportation	6/17/24	<p>Integrated Transportation and Land Use Planning</p> <p>Transportation and housing are integrally connected. The Housing Element Update process provides a mechanism to reflect current transportation and land use policy and adopt efficient land-use strategies such as transit-oriented, infill and mixed-use developments that can potentially reduce vehicle miles traveled and address climate change.</p> <p>Please review and include the reference to the current California Transportation Plan (CTP) in the DEIR. CTP 2050 envisions that the majority of new housing located near</p>	<p>The comment is noted. The following information is hereby incorporated into the DEIR to clarify and amplify the description of the regulatory framework: DEIR p. 3.7-5: California Transportation Plan (CTP) 2050 CTP 2050 envisions that the majority of new housing located near existing housing, jobs, and transit, and in close proximity to one another will reduce vehicle travel and GHG emissions, and be accessible and affordable</p>

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			<p>existing housing, jobs, and transit, and in close proximity to one another will reduce vehicle travel and GHG emissions, and be accessible and affordable for all Californians, including disadvantaged and low-income communities. The location, density, and affordability of future housing will dictate much of our future travel patterns, and our ability to achieve the vision outlined in CTP 2050. Caltrans encourages the Town to consider and explore the potential of excess state-owned property for affordable housing development, per Executive Order N-06-19.</p>	<p><u>for all Californians, including disadvantaged and low-income communities. The location, density, and affordability of future housing will dictate much of our future travel patterns, and our ability to achieve the vision outlined in CTP 2050.</u></p> <p>This addition to the Regulatory Setting does not constitute significant new information requiring recirculation pursuant to CEQA Guidelines section 15088.5.</p> <p>The remainder of the comment pertains to the Proposed Project and is not related to the adequacy of the DEIR; thus, no further response is required.</p>
A2-5	California Department of Transportation	6/17/24	<p>Equity and Public Engagement</p> <p>We will achieve equity when everyone has access to what they need to thrive no matter their race, socioeconomic status, identity, where they live, or how they travel. Caltrans is committed to advancing equity and livability in all communities. We look forward to collaborating with the Town to prioritize projects that are equitable and provide meaningful benefits to historically underserved communities.</p> <p>Caltrans encourages the Town to foster meaningful, equitable and ongoing public engagement in the Housing Element Update development process to ensure future transportation decisions and investments reflect community interests and values. The public engagement process should include community-sensitive and equity-focused approaches seeking out the needs of individuals from underserved, Tribal, and low-income communities, the elderly, and individuals with disabilities.</p> <p>Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this</p>	<p>The comment is not related to the adequacy of the DEIR; thus, no further response is required.</p>

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			letter, please contact Luana Chen, Transportation Planner, via LDR-D4@dot.ca.gov. For future early coordination opportunities or project referrals, please contact LDR-D4@dot.ca.gov.	
B1-1	Donaldson, Toni	5/6/2024	<p>Traffic</p> <ul style="list-style-type: none"> The area of Woodside Road and High Road is already congested, especially in the morning and midafternoons. There is also a very dangerous curve coming off of Woodside Road at Todo El Mundo that has been a source of concern for many years already. 	<p>Thank you for your letter. As detailed on page 3.7-4 of the EIR, an assessment of impacts on traffic congestion is no longer required under CEQA and thus, congestion is not analyzed in the DEIR. With the passage of SB 743 (September 27, 2013) and the subsequent adoption of revised CEQA Guidelines in 2019, level of service (LOS) can no longer be used as a criterion for identifying significant transportation impacts for most projects under CEQA. LOS measures the average amount of delay experienced by vehicle drivers at an intersection during the most congested time of day, while the new CEQA metric (vehicle miles traveled, or VMT) measures the total number of daily miles traveled by vehicles on the roadway network and the impacts on the environment from those miles traveled.</p> <p>As stated on page 3.7-9 of the DEIR, new development under the Proposed Project would be required to comply with General Plan policies and Town Code regulations. This includes Circulation Element goals to maintain safe roadways and the Town Code road patterns and design guidelines which provide safety standards. As a result, future development consistent with the Proposed Project would not conflict with a program plan, ordinance or policy addressing the safety of the circulation system.</p>

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B1-2	Donaldson, Toni	5/6/2024	<ul style="list-style-type: none"> Trying to get onto Woodside Road from High Road is already a challenge for many parts of the day, especially during the school year. With there only being one way in and one way out at this portion of High Road, any construction would pose a huge problem for the residents of High Road and Todo El Mundo There is no public transportation for this site 	<p>Please see response to comment B1-1 regarding traffic. In addition, as detailed under Impact 3.10-1 on page 3.10-17, 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 Project would not impede the implementation of emergency response and evacuation plans; impacts would be less than significant.</p> <p>As detailed on page 3.7-11, transit service is provided by San Mateo County Transit District. 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.</p>
B1-3	Donaldson, Toni	5/6/2024	<p>Safety</p> <ul style="list-style-type: none"> The Woodside Road/High Road exit is one of only two ways out of Woodside Hills, the other exit being all the way up High Road. In the event of a fire, this would be death trap for people trying to get out of there. 	<p>As detailed under Impact 3.10-1 on page 3.10-17, 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</p>

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				emergency responses and evacuations. Therefore, housing development associated with the Proposed Project would not impede the implementation of emergency response and evacuation plans; impacts would be less than significant.
B1-4	Donaldson, Toni	5/6/2024	Has anyone confirmed the size of the large gas line running up Todo El Mundo? Make sure that the PG&E gas line is included in this review....I don't think anyone wants another San Bruno pipeline situation	As detailed on page 3.9-18; in order to prevent impacts from the gas transmission line adjacent to the site on High Road, 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. ¹ 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

¹ 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.

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B1-5	Donaldson, Toni	5/6/2024	Geology, soils <ul style="list-style-type: none"> • Caltrans has completed major slide remediation multiple times on Woodside Road, from High Road to Highway 280. It is still not stable. 	<p>excavate. PG&E then provides the excavators with information about the location of its underground facilities, including natural gas, electric, and fiber optic.</p> <p>As detailed on page 3.4-19, 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.</p>

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B1-6	Donaldson, Toni	5/6/2024	<p>Noise</p> <ul style="list-style-type: none"> There is already quite a bit of noise from Woodside Road. Adding more cars brings more noise and exhaust and bad air quality 	<p>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. Further, page 3.2-35 state that 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 is considered less than significant.</p>
B1-7	Donaldson, Toni	5/6/2024	<p>Aesthetics</p> <ul style="list-style-type: none"> This site is open space now and a natural barrier from the traffic on Woodside Road. To take that away and build structures on the site, would totally change the livability of this part of Woodside. 	<p>As detailed on page 3.1-15, the Proposed Project would 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 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</p>

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				would not degrade the existing character or quality of public views of the Planning Area.
B1-8	Donaldson, Toni	5/6/2024	<p>Additional Concerns</p> <ul style="list-style-type: none"> • I seriously have my reservations about how these sites were chosen. It might have been more effective to have the group go as a unit to each site and discuss the pros and cons of each site, rather than have them viewed or not viewed independently by those making the inclusion decision. • That became obvious when one of the sites was deemed open space and could not be built on, and again the fact that Woodside Hills is not even in the Woodside School District, which would probably not be viewed as very “equitable” by some. • It is my understanding that the new housing should not be clustered into one area....BUT if you look at the proposed sites, they are all clustered fairly close together, and well away from the town center. • The town center has cafes, a library, grocery store, restaurants, a church, and the elementary school that serves the Town of Woodside (other than some parts of Woodside that are in the now proposed sites (they are in the Redwood City school district). • It was my understanding that a town center with all of these accommodations is exactly the type of area where the housing should be situated or at least have a site identified within this area. 	The comment pertains to the Proposed Project and is not related to the adequacy of the DEIR; thus, no further response is required.
B2-1	Goeld, Paul	6/17/2024	The comments listed below relate to the Environmental Impact Report for the Town of Woodside’s 6th Cycle (2023-2031) Housing Element. I offer these comments as a private citizen.	Thank you for your letter. The Project will be sensitive to the historic character of the Town. As stated on page 3.1-15, implementation of the Proposed Project would be required to comply with applicable

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			<p>The Environmental Impact Report (EIR) states the primary goal of the Housing Element, namely “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.” Unfortunately, the plan the town proposes will not provide the projected affordable housing and it will not be sensitive to the historic character of the Town.</p>	<p>zoning and other regulations governing visual character. Such regulations include proposed Objective Design Standards (ODS), the General Plan, and the Town of Woodside Design Guidelines. Compliance with existing regulations and Proposed Project actions would help reduce impacts of new development and impacts would be less than significant. Please see also response to comment B1-7 regarding ODS.</p> <p>The remainder of the comment pertains to the Proposed Project and is not related to the adequacy of the DEIR; thus, no further response is required.</p>
B2-2	Goeld, Paul	6/17/2024	<p>On the other hand, the Infill Alternative that is presented in the EIR would result in a reduced impact and is the obvious choice that the Town should make. Having to hold an election to change town center zoning does not prevent this choice and HCD has approved Housing Elements that have relied on future elections. The Infill Alternative presented in the EIR only considers infill alternatives in the commercial areas of Woodside. Why not add residentially zoned areas that are close to the town center? We have done that with the Canada Road site.</p>	<p>As detailed on page 4-13 of the DEIR, 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.</p> <p>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</p>

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				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.
B2-3	Goeld, Paul	6/17/2024	Several infill opportunities exist in areas that are within easy walking distance of the town center. Using this area for an expanded ADU construction would greatly reduce the vehicle mileage impact and, importantly, integrate affordable housing into the fabric of Woodside rather than the current plans to locate them in the most distant, isolated locations of our town that are absent of the required resources (schools, recreation, transportation, shopping, etc.). Infill development would reduce the disruption of natural habitats by utilizing sites which have already been developed. Dismissal of infill alternatives is a major flaw in the EIR and should be corrected.	Please see response to comment B2-2 regarding alternatives. In addition, all alternatives assume development of ADUs consistent with permitting trends in Woodside since 2018.
B3-1	Hansen, Kim	6/16/2024	Thank you for this reply Sage. I have further questions, and have tried multiple times to reach you by phone, but I understand you are busy. Please include this email in the public comments on EIR.	Thank you for your letter. As stated on ES-1, 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

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			<p>-I do not agree with your statement below/assessment. The draft EIR does very much address specific sites that are included in the housing element:</p> <p>"The EIR analyzes a guiding document for future development (Housing Element/Zoning), but does not evaluate the specific details of specific development projects." "</p> <p>-You also mention that the consultant could provide further explanation. My ask is that this draft is not accepted until the public has an opportunity to hear the explanation(s) from the consultant, as you seem to suggest.</p>	<p>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</p> <p>Project and the findings of this EIR may also be eligible for streamlined environmental review as permitted under CEQA.</p>
B3-2	Hansen, Kim	6/16/2024	<p>-The CEQA/Draft EIR focuses on environmental impacts from the construction project over an estimated 2 yr timeframe. It is flawed in it does not have an estimate on the impacts to the people who will live in these projects and the neighbors. There are no noise measurements or pollutant measurements suggested or provided, as an example.</p>	<p>As stated on page ES-1, the DEIR analyzes implementation of the Proposed Project over its eight-year planning period that runs from 2023 through 2031. Noise analysis and corresponding measurements are detailed in Chapter 3.6 of the DEIR. Air quality pollution measurements and impacts are detailed in Chapter 3.2 of the DEIR.</p>
B3-3	Hansen, Kim	6/16/2024	<p>-There is also no mention of public comments during Town Council meetings or other emails sent during the Housing element discussions. It is my impression that the only comments included were from a subset of the comment periods. What comments were actually included and from what time period?</p> <p>-When will TC be asked to approve this document (they should not in its current form). .? .?</p> <p>-I ask that the majority of Town Council members read this document (100s of pages!) before deciding to approve. And if they do not have enough time, the public comment period be extended (60 instead of 45 is allowed- why pick 45?).</p>	<p>As stated on page 1-5, an 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</p>

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				<p>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.</p> <p>This FEIR together with the DEIR will constitute the EIR if the Town Council certifies it as adequate and complete under CEQA.</p>
B3-4	Hansen, Kim	6/16/2024	-We have paid over \$164,000 in 2022-23 to this consultant in 2022-2023- but there are many questions that need to be answered, such as why were the vehicle trip studies that were included conducted during the 2020 pandemic. That cannot be representative of normal vehicle trips???	<p>The commenter is incorrect. The VMT study was not based on traffic counts taken in 2020. Rather, as noted on page 5 of Appendix G, the study relied on estimates from the C/CAG-VTA travel demand model for VMT in Woodside in 2020, which were based on data collected in years prior. Baseline 2020 data for the VMT analysis represents the most accurate and up-to-date data available at the time the EIR was prepared. Therefore, the findings of the EIR are valid.</p>

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B3-5	Hansen, Kim	6/16/2024	-Before rezoning parcels, when will there be a discussion of the definition of the new multi-family zone requirements? I do not agree that we break w zoning precedent and define design standards based upon the project proposed. As you know better than I do, In the past, Zoning defines what you can build- setbacks, height, etc, not that the project defines the rules. I do not agree we should set up a new multi-family zone that is, essentially: we will allow you to build whatever you want as long as it meets our State high density low income housing allocation. Give up local control and quality/health/safety of living for all present and future residents with this approach.	The comment pertains to the Proposed Project and is not related to the adequacy of the DEIR; thus, no further response is required in this document.
B3-6	Hansen, Kim	6/16/2024	Ill send additional comments in a separate message. Did you know that the Woodside Fire Protection District does not have equipment to fight fires or save lives on structures greater than 2 stories? WFPD input is needed. You cannot agree that this EIR is good to go. If public comment and concern is a waste of time and will not impact your action on this topic, I am greatly saddened that I've spent countless hours on this topic with the goal of supporting Woodside.	As stated in the Initial Study, which was included as Appendix A of the DEIR, 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. The

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B3-7	Hansen, Kim	6/16/2024	<p>What is the pupose of the posted EIR and status of other environmental analysis as part of CEQA? What other obligations does the Town have to investigate the environmental impact of building to satisfy our Housing Element?</p> <p>I started to read the consultants' EIR and became frustrated... Does it only comment on possible impact of only the construction phase of development? No analysis or data collection on the long and immediate term effects of a project in a specific location? There is no inclusion of a huge body of concerns voiced by residents, disproportionate collection and lack of collection of info from the past year, no noise data, pollution data, community/scenic character, no traffic study/data, fire authority weigh in, sewer costs and impacts, etc. Mostly blah blah blah. And while there is some mention of concern in the beginning of the document, the end of the doc summarizes the and dismisses the concerns as low. WT?</p>	<p>DEIR analysis is adequate, and impacts would be less than significant.</p> <p>As stated on page 1-1, 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). 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."</p> <p>The DEIR accounts for construction and operational impacts. Please see response to comment B3-3 regarding public input. Please see response to comment B3-1 regarding the programmatic nature of the DEIR. The DEIR does also quantitative analysis of GHGs, air quality, Noise, and VMT. See appendices D, F, and G for further details.</p>
B3-8	Hansen, Kim	6/16/2024	<p>There is no mention of the effects these, specifically the Raymundo location will have on the people living there and around there. No mitigations mentioned of quality of life or community investigation for the potential hazards involved in</p>	<p>Please see response to comment B3-1 regarding the programmatic nature of the DEIR. Fire, noise, pollution, and transportation impacts are analyzed in</p>

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			building in an area that is surrounded by fire, noise, pollution, transportation and segregation risks.	chapters 3.10, 3.6, 3.2, 3.5, and 3.7 of the DEIR.
B3-9	Hansen, Kim	6/16/2024	Specifically, I would like to ask how much the Town paid for this report, how it will be used, has it been critiqued, and what responsibility is there to look at impacts other than just the construction phase. Is it necessary to file a public records request or can you please help me to understand this report and address this series of questions? When are the next meetings to discuss?	The DEIR accounts for construction and operational impacts. The remainder of the comment is not related to the adequacy of the DEIR; thus, no further response is required in this document.
B4-1	Hansen, Kim	6/17/2024	The spirit of housing element is to cause no harm. This report indicates that harm will be caused to people and the environment. Punishing and harming not for what we have done, but for who we are: residents in certain areas of Woodside. And we will continue to harm the residents that we will put into segregated areas on lots that are not buildable at this density. The Objective (Subjective) Design Standards proposed for the new multifamily zone approach is not acceptable- We will cause irreparable harm by making up standards based upon the proposed project.	Thank you for your letter. The comment pertains to the Proposed Project and is not related to the adequacy of the DEIR; thus, no further response is required in this document.
B4-2	Hansen, Kim	6/17/2024	Does not address/ I'm concerned that there is no internet on Raymundo Does not address/ I'm concerned that there is no sewer pipe infrastructure on Raymundo Were the construction impacts of new water main and new sewer pipe undergrounding of PGE lines and addition of fiber/cable internet considered in this EIR? What are the projected environmental and financial costs of the above?	Please see response to comment B3-1 regarding the programmatic nature of the DEIR. Impact 3.9-1 details whether the Proposed Project 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, and whether there would be associated impacts. Please see also response to comment B12-1.
B4-3	Hansen, Kim	6/17/2024	Does not address 280 noise health impact on new project residents	Noise impacts are addressed in chapter 3.6 and GHG and air quality pollution is

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			Does not address 280 pollution impact on new project residents Does not require/mention sound wall mitigation	addressed in chapters 3.2 and 3.5. It was determined that only construction noise reduction mitigation would be necessary under the Proposed Project, and such mitigation is outlined on page 3.6-19.
B4-4	Hansen, Kim	6/17/2024	Does not mention/I'm concerned about SF Water PUC management of adjacent high fire land- what agencies responsible?	<p>As stated on page 3.10-5, 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, 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.</p> <p>As detailed on page 3.10-16, there are several plans that guide emergency response and wildfire hazard mitigation in High and Very High FHSZs. These include 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), and the Town of Woodside Evacuation Plan.</p>

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				Regionally, there is also the CAL FIRE San Mateo-Santa Cruz Unit (CZU) Strategic Fire Plan and Santa Cruz County and San Mateo County Community Wildfire Protection Plan (CWPP). These plans paired with State and local codes detailed on page 3.10-19, would reduce wildfire risk to a less-than-significant level.
B4-5	Hansen, Kim	6/17/2024	I'm concerned that the Raymundo site in particular will be the largest structure, and situated the shortest distance to 280 for the whole stretch of 280 from at least 380 to 85. This is indeed a negative impact to the scenic corridor and not consistent w the general plan.	Please see response to comment B3-1 regarding the programmatic nature of the DEIR. In addition, as stated on page 3.1-14, multi-family development would be subject to ODS 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. As such, the DEIR analysis is adequate and adverse effects on scenic vistas in the Planning Area would be minimized to the extent practicable and associated impacts would be less than significant.
B4-6	Hansen, Kim	6/17/2024	I'm concerned about how the run-off water that normally collects in the Raymundo site will be managed. Where will it	Please see response to comment B3-1 regarding the programmatic nature of the

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			be diverted? We already get storm water runoff from highway 280, that floods Runnymede road in the rainy season. Now we pave Raymundo site- what are impacts? Will it flood the Crystal Springs trail?	DEIR. As stated on page 3.11-9, 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.
B4-7	Hansen, Kim	6/17/2024	I'm concerned about no mention of the Crystal Springs Trail that is adjacent and a critical link to the park system and the impacts on the SMC Park and blocking the equestrian trail and wildlife corridor I'm concerned about impacts to the Crystal Springs watershed/open space area. And wildfire here.	As stated on page 3.3-27, the Planning Area is located in areas with habitat connectivity. 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. With implementation of these policies and adherence to local regulations, 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. Wildfire impacts are assessed in chapter 3.10. Please see also response to comment B4-4 regarding wildfire risk.
B4-8	Hansen, Kim	6/17/2024	How to create defensible space around the Raymundo site? Specifically SFPUD land to the North and West. No mention	Please see response to comment B3-1 regarding the programmatic nature of the DEIR. Please see response to comment B4-4 regarding responsible agencies. As stated on

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			or analysis of the SFPUC high fire WUI interface and who is responsible and how to make sure to keep residents safe?	page 3.10-20, 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.
B4-9	Hansen, Kim	6/17/2024	I'm concerned about maintenance of wildlife corridors, migratory animals and how project construction and permanent fencing could impede movement.	As stated on page 3.3-27, the Planning Area is located in areas with habitat connectivity. 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. With implementation of these policies and adherence to local regulations, 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. 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.

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B4-10	Hansen, Kim	6/17/2024	<p>There needs to be Raymundo onsite parking requirement of standard 2.25 spaces per unit.</p> <p>The analysis uses estimate of < 3 occupants per unit- How can that estimate be relied on? What are the sizes of the units? Where will extra cars and visitor cars park?</p>	<p>The comment pertains to the Proposed Project and is not related to the adequacy of the DEIR; thus, no further response is required in this document.</p>
B4-11	Hansen, Kim	6/17/2024	<p>Vehicle Trip VMT data study done in 2020- PANDEMIC. This data is unreliable and study needs to be repeated/improved. Potentially significant impact but mitigations are not likely to be successful unless we re-identify sites closer to town center</p>	<p>Please see response to comment B3-4. As stated on page 3.7-10, VMT impacts are considered significant and unavoidable with mitigation incorporated.</p>
B4-12	Hansen, Kim	6/17/2024	<p>Sets unacceptable precedent of rezoning open space to residential. Can we now do this for any open space? Why did you choose these locations for rezoning? There is no project application for Raymundo or High. Wait. What about the other Open Space parcels that are Town owned? Will the Town revoke its deed restrictions, risk litigation and take this land from the public?</p>	<p>The comment pertains to the Proposed Project and is not related to the adequacy of the DEIR; thus, no further response is required in this document.</p>
B4-13	Hansen, Kim	6/17/2024	<p>What if Town Council picked bad sites. What if the environmental impact is too great. Who calls them out? What does it have to take to change to an infill approach? This report lists several serious problems with the 3 Town-owned sites.</p> <p>This EIR does indeed address project specific sites and specific aspects of the sites but does not fully address impacts for these sites or future development.</p> <p>I'm concerned that this document should NOT be used for the dual purpose of the short term housing element requirement and basis or fast-track streamline future projects.</p> <p>This EIR is not suitable, specific or comprehensive for basis for streamlined or minimal environmental review. And should not be basis for short-cutting or ministerial review of projects.</p>	<p>Please see response to comment B3-1 regarding the programmatic nature of the DEIR. The comment pertains to the Proposed Project and is not related to the adequacy of the DEIR; thus, no further response is required in this document.</p>

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B4-14	Hansen, Kim	6/17/2024	The report does not address environmental impacts to the new residents who will live in these developments. How will our construction standards and environmental hazards effect the occupants and neighbors. Neighbors cannot get out in an emergency BTW. Does not talk about the impacts to adjacent parcels. Woodside development on lots on Jefferson/Godetia and damage to other residents shows that we need to include a holistic and larger impact view than parcel specific, currently we do development in a site-centric vacuum.	Please see response to comment B3-1 regarding the programmatic nature of the DEIR. The DEIR does analyze both construction and operational impacts with development under the Proposed Project. Please see also response to comment B1-3 regarding evacuation.
B4-15	Hansen, Kim	6/17/2024	<p>Communication from Sage says that the EIR is not site specific, but it is.</p> <p>EIR does not include zoning plan and definition for new multifamily zone. All our current standards are for single family residents (some ADU and lot splits), but the general plan and all construction rules” need to be re-written for apartment buildings.</p> <p>No discussion of the need to have geo and other analysis done before project approval and permit issuance</p> <p>Ministerial (which is suggested for future multi-family projects) is an over-the-counter type approval based upon guidelines that are currently being proposed to be “propose a project, and then we will define the development the criteria” suggested approach. Current zoning standards have zone specific guidelines (setbacks building heights, % dev area, rules for slope and parking, etc)</p>	Please see response to comment B3-1 regarding the programmatic nature of the DEIR. See Chapter 2, Project Description, for a discussion of proposed general plan amendments, zoning amendments, and objective design standards. The remainder of the comment is not related to the adequacy of the DEIR; thus, no further response is required in this document.
B4-16	Hansen, Kim	6/17/2024	Endangered species analysis should be required before project approval- Especially serpentine grass, small mammals and reptiles of protected status.	As stated on page 3.3-18, General Plan 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 a present or potentially, the Town shall require preparation of biotic reports and pre-construction surveys by a professional

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				biological consultant in order to identify and mitigate potential impacts. 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.
B4-17	Hansen, Kim	6/17/2024	How many trees will be removed Raymundo site? Will the Eucalyptus trees be removed? There are many trees on this site.	Please see response to comment B3-1 regarding the programmatic nature of the DEIR.
B4-18	Hansen, Kim	6/17/2024	The infill method seems to be environmentally superior, based upon this presumption-laden report. Are we to take this recommendation to proceed with this infill recommendation?	Please see response to comment B2-2 regarding alternatives.
B4-19	Hansen, Kim	6/17/2024	Transportation concerns were mentioned that will result in significant impact. But why no mitigations suggested? Seems that we should scrap these 2 Town owned sites. No new businesses or commercial corridor increase in businesses is a concern	MM-TRANS-1 is proposed on page 3.7-14. 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. The remainder of the comment pertains to the Proposed Project and is not related to the adequacy of the DEIR; thus, no further response is required in this document.
B4-20	Hansen, Kim	6/17/2024	-Woodside Town Center is the area of proposed development per recent Town Council meeting discussion. Skylonda Town Center is up on Skyline/84 (just west of where the road washed down the hill) and portions (adjacent to unincorporated SMC) is very different and the report does	Chapter 4 of the DEIR includes a discussion of alternatives 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. A No

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			<p>not make good distinction, nor has it included Skylonda area residents in this discussion. Outreach is required.</p> <p>-Skylonda 4-corners area has law enforcement challenges. What will be done to address this if development here?</p> <p>https://www.woodsidesidetown.org/DocumentCenter/View/413/Area-Plans-PDF</p> <p>-No map included to define Skylonda town center</p>	<p>Project Alternative is analyzed, together with an Infill Alternative is discussed that 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. Map 4-1 show the location of Infill Alternatives sites. As noted on page 4-1 of the DEIR, the purpose of the alternatives analysis is 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. The Proposed Project does not involve development of sites included in the Infill Alternative. Please see also response to comment B2-2.</p>
B4-21	Hansen, Kim	6/17/2024	<p>-My recollection is that conversations regarding adding housing are in the commercial corridor surrounding Woodside Town center. No mention of this in the report.</p> <p>-Report does not do a good job addressing these 2 distinct Town Centers: their constraints and characteristics.</p>	<p>The comment pertains to the Proposed Project and is not related to the adequacy of the DEIR; thus, no further response is required in this document.</p>
B4-22	Hansen, Kim	6/17/2024	<p>-High Rd property and Canada college properties will go to RWC k-8 schools, correct? Skylonda PV schools, Raymundo and Town center WES. Have schools been included in proposed impacts? And the increased vehicle trips or bus need?</p> <p>-A bus cannot turn around on Raymundo. Can a fire engine?</p>	<p>School impacts are discussed on page 3.11-12 of the DEIR as well as on page 56 of the Initial Study, located in Appendix A of the DEIR. 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</p>

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			-Will fire engine turnarounds be required on each of these sites, specifically Raymundo? What is the evacuation plan? Get stuck and have your family, horses, animals die?	<p>Proposed Project would not necessitate the construction or expansion of new school facilities and this impact would be less than significant.</p> <p>VMT analysis incorporated buildout from the Proposed Project, see Appendix G. As stated on page 3.10-9, Fire Code Chapter 10 addresses fire related means of egress, including fire apparatus access road width requirements. Please see also response to comment B1-3 regarding evacuation.</p>
B4-23	Hansen, Kim	6/17/2024	-Closest public transport (bus stop) is probably >2miles away, up a steep hill to get to bus stop. This is not pedestrian friendly and not a viable option. This is not addressed.	As detailed on page 3.7-11, transit service is provided by San Mateo County Transit District. 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.
B4-24	Hansen, Kim	6/17/2024	What about ability to get insurance and the cost of insurance? How will these projects impact insurability and price? Will the Town and it's dev partner pass on these high insurance prices to Town residents? And what if project resident wants renter insurance?	The comment is not related to the adequacy of the DEIR; thus, no further response is required in this document.
B4-25	Hansen, Kim	6/17/2024	Realist APN search says Raymundo site is w/in 250 ft of a multiple flood zone. This is not mentioned. What are mitigations, environ impacts and costs for construction and residents?	Figure 2-2 in the DEIR shows the location of proposed housing sites in relation to FEMA-delineated flood zones. As stated on page 3.11-9, 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

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				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.
B4-26	Hansen, Kim	6/17/2024	Specific edits/non-factual report comments: ES2: Planning area does not have agriculture, livestock pasturing (what is that?), does have tourism and recreation as well as historic points of interest. Destination for outdoor activities to include hiking biking horse riding.	The Executive Summary Planning Area statements are accurate. The comment is not related to the adequacy of the DEIR; thus, no further response is required in this document.
B4-27	Hansen, Kim	6/17/2024	Project primary objective is more housing units. Other objectives are secondary to this and don't seem to matter.	The comment pertains to the Proposed Project and is not related to the adequacy of the DEIR; thus, no further response is required in this document.
B4-28	Hansen, Kim	6/17/2024	ES3: Housing is as much a crisis as environmental and global warming impact "crisis". What about the crisis that the best way to not get someone to NOT read a report is to make it too long? Aesthetics are mostly oak trees. We have no apartments and no 3 story buildings above grade.	The comment pertains to the Proposed Project and is not related to the adequacy of the DEIR; thus, no further response is required in this document.
B4-29	Hansen, Kim	6/17/2024	ES4: Evacuation from wildfire is big issue. Strategy far from robust.	Please see response to comment B1-3 regarding evacuation.
B4-30	Hansen, Kim	6/17/2024	ES5 What about Town Center Commercial Corridor? Missing Middle? The infill is not at Skylonda	Please see response to Comment B4-20 regarding the Infill Alternative.
B4-31	Hansen, Kim	6/17/2024	ES12 How is flagging and fencing proven to help bio resources? What if bio is in the construction zone? What pre-screening is performed? ES13 14 Survey should be required. This needs to be part of zoning and building checklist. Before development and permit issuance.	Flagging or fencing sensitive biological habitat on-site to ensure it is avoided during construction and pre-construction activities. As stated on page 3.3-18, General Plan Policy CV1.1 requires that development be planned sensitively to preserve natural features and landscape and includes a strategy where if a

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				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. 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.
B4-32	Hansen, Kim	6/17/2024	ES16 there should be guidelines and has there been an impact study and mitigation for tree removal	As stated on page 3.3-13, the local tree protection regulations (Sections 153.430 – 153.439) establish minimum standards and requirements for the protection of trees.
B4-33	Hansen, Kim	6/17/2024	ES 19 What if water/creek/runoff is seasonal?	As stated on 3.11-8, 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.
B4-34	Hansen, Kim	6/17/2024	ES25 Raymundo and many potential sites are in a seismic zone – mitigation for safety should be required and geo	Please see response to comment B1-5 regarding landslide impacts. As detailed on

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			survey done before permit issuance. Same as landslide danger. What mitigations are available?	page 3.4-19, compliance with existing regulations, such as the CBC and Municipal Code, would ensure that risks are minimized to the extent practicable, and impacts related to fault rupture and ground shaking would be less than significant.
B4-35	Hansen, Kim	6/17/2024	ES 26 How is air quality for workers and for new residents in Raymundo next to 280 location? And this report is relying highly on compliance- What will Town do to enforce? Town engineer says enforcement person is already over tasked and that we rely on complaining/tattling system. What mitigation for this? How to get enforcement?	Please see response to comment B7-3 regarding enforcement. As detailed on page 3.2-31, given that the operation of the Proposed Project would not exceed BAAQMD's significance thresholds, operational air quality impacts are less than significant. For construction, 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.
B4-36	Hansen, Kim	6/17/2024	ES27 When will climate action plan be updated? How monitor emissions? What mitigations?	As stated on page 3.5-22, 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

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				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.
B4-37	Hansen, Kim	6/17/2024	ES28 How will noise be reduced? What is cost and possibility to shield neighbors from construction noise for 2 yrs, as well as residents for the new project after construction? What will be done to enforce create staging areas? Where will that be? Raymundo High specifically. ES30 bus stop too far away and up hill. What mitigation? Measures listed are only for Canada college site?	Please see response to comment B1-5 regarding landslide impacts. As stated on page 3.6-17, compliance with existing regulations and implementation of Mitigation Measure N-1 would ensure that impacts related to construction noise would be less than significant. Please see response to comment B7-3 regarding enforcement. As detailed on page 3.7-11, transit service is provided by San Mateo County Transit District. 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. MM-TRANS-1 represents the only feasible mitigation for the Town.
B4-38	Hansen, Kim	6/17/2024	ES31 there would indeed be impacts to transportation	As stated on page 3.7-10, transportation Impact 3.7-2 related to VMT would be significant and unavoidable even after implementation of all feasible mitigation.
B4-39	Hansen, Kim	6/17/2024	ES33 Construction of sewer main has not been considered. Please include and address impacts	Impact 3.9-1 on pp. 3.9-14 through 3.9-17 of the DEIR details whether the Proposed Project require or result in the relocation or

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			ES34 Infrastructure needs and evacuation wildfire etc need consideration and discussion	<p>construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, and whether there would be associated impacts. Please see also response to comment B12-1.</p> <p>See also page 3.10-20 for a discussion of whether the Proposed Project would 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. Please see also response to comment B1-3 regarding evacuation.</p>
B4-40	Hansen, Kim	6/17/2024	<p>1-1 What is rejection mechanism and timeframe?</p> <p>Program EIRS are not good enough for future- How can this report be improved? What about a separate report?</p>	The comment is not related to the adequacy of the DEIR; thus, no further response is required in this document.
B4-41	Hansen, Kim	6/17/2024	1-4 insurance, Evacuation	The comment is not related to the adequacy of the DEIR; thus, no further response is required in this document.
B4-42	Hansen, Kim	6/17/2024	2-1 Add details about SFPUC Water wildland- map also Also add responsibility parties for future maps	The comment is not related to the adequacy of the DEIR; thus, no further response is required in this document.
B4-43	Hansen, Kim	6/17/2024	2-3 Hermit fault	The active and potentially active fault traces that pass through Woodside are considered to be the San Andreas, Cañada, and Pilarcitos Faults.
B4-44	Hansen, Kim	6/17/2024	2-4 Address small sites that could have septic. Add Internet Raymundo does not have. What is the impact? Who pays?	Impact 3.9-1 details whether the Proposed Project require or result in the relocation or construction of new or expanded water,

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				<p>wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, and whether there would be associated impacts.</p> <p>Please see Appendix A pp.43 which notes that about two-thirds of the parcels in Woodside utilize private on-site septic systems for effluent waste disposal, while the rest utilizes the sewer system. The Municipal Code (Chapter 51.030) requires that every building be connected to a private wastewater disposal system where a public sanitary sewer is not available. The use of private onsite septic systems is regulated by the San Mateo County Department of Environmental Health and by regulations contained in the Town Municipal Code. Continued compliance with these regulations would ensure that septic systems needed to accommodate future development occurring with buildout of Proposed Plan would be constructed on soils capable of supporting them. Therefore, associated impacts were found to be less than significant.</p>
B4-45	Hansen, Kim	6/17/2024	<p>2-5 Add more detail re the AP Seismic Special study zone and what are the impacts to construction? Raymundo is located here. Maybe Canada too? Will we change standards? Will the setbacks in these seismic zones be ignored? Where is the map that shows the unpublished investigations? Most of this data is old- is it relevant? Do we have better data? This is important</p>	<p>Please see response to comment B3-1 regarding the programmatic nature of the DEIR. Data used in the DEIR represents the most recent and accurate data available. Compliance with existing regulations would ensure that seismic risks are minimized to the extent practicable, and impacts related would be less than significant.</p>

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B4-46	Hansen, Kim	6/17/2024	2-6 Where When specifically were comments submitted? Why not include Town Council Meeting comments?	Please see response to comment B3-3 regarding public input.
B4-47	Hansen, Kim	6/17/2024	2-7 To be clear, the project objective is bullet 1, the other bullets are very much secondary and look to be subordinate and ignorable	The comment is not related to the adequacy of the DEIR; thus, no further response is required in this document.
B4-48	Hansen, Kim	6/17/2024	2-8 Where to find these appendixes? Need to add evacuation routes 2-10 This map and color is unreadable 2-11 This page is very site specific and yet not specific enough. Why?	The comment pertains to the Proposed Project and is not related to the adequacy of the DEIR; thus, no further response is required in this document. The appendixes are available under Volume 2 at this link: https://www.woodsideca.gov/379/California-Environmental-Quality-Act-CEQ
B4-49	Hansen, Kim	6/17/2024	2-13 What is a different timeline for re-zoning? What are the zoning rules for MFRZ? When will section 153.110 be updated 2-14 to be updated? What is this map showing? Out of date?	See page 2-13 regarding General Plan and zoning amendments. The proposed General Plan Land Use map reflecting these changes is included as Figure 2-4.
B4-51	Hansen, Kim	6/17/2024	2-16 Glaringly absent are WFPD, CalFire, SFPUC	Page 2-16 of the DEIR lists federal, State, regional, and local government agencies that may have jurisdiction over development proposals in the Planning Area. The California Department of Forestry and Fire Prevention would not likely have jurisdiction on development projects in Woodside; however, the Woodside Fire Protection District and the San Francisco Public Utilities Commission could possibly have jurisdiction over certain projects. Therefore, the list of responsible agencies in the DEIR is hereby revised as follows: <ul style="list-style-type: none"> • U.S. Army Corps of Engineers • Federal Emergency Management Agency

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				<ul style="list-style-type: none"> • 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 • San Francisco Public Utilities Commission • Woodside Fire Protection District <p>The comment is not related to the adequacy of the DEIR; thus, no further response is required in this document.</p>
B4-50	Hansen, Kim	6/17/2024	<p>2-15 The Objective Design Standards on this page are unacceptable and are in violation of planning precedents and common sense. These setbacks have not been set to be consistent with the site and the environment. How many stories is a 40 ft building? Subjective Design Standards should be the name of this section and there needs to be a discussion about this- I think should be rejected. Need timeline, authority body, and impacts for each site.</p>	<p>The comment pertains to the Proposed Project and is not related to the adequacy of the DEIR; thus, no further response is required in this document.</p>
B4-52	Hansen, Kim	6/17/2024	<p>3-11-2 What about the 280 scenic corridor?! Raymundo and Canada sites would be the only big ugly pimples in rolling grassland oak tree studded landscape in this corridor for miles and would impact not only neighbors but everyone driving this state protected (we are violating?)</p> <p>Need to block light from 280 for residents of projects. And neighbors! Town has already demonstrated that it does not</p>	<p>Please see response to comment B2-1 and B1-7 regarding ODS and impacts on visual character. In addition, as stated on page 3.1-14, multi-family development would be subject to ODS and requirements in the Municipal Code that regulate lot dimensions, building height, and setback requirements (Municipal Code Section 153.110(C) to</p>

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			<p>care to control light from Canada College, so how will these projects do better? What mitigations rules would improve?</p>	<p>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.</p> <p>As stated on page 3.1-16, 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. Future development would also be required to comply with Town Code and CBC standards. 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.</p>

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B4-53	Hansen, Kim	6/17/2024	3.13 What are mitigations and justifications for these projects in scenic corridor, as shown by this map from 2012?	Please see response to comment B4-52.
B4-54	Hansen, Kim	6/17/2024	3.14-5 Where is discussion and admission that the General Plan of 2012 is violated and subjugated to the Housing element? What are risks and costs? Property value devaluation of proximal neighborhoods needs to be discussed as a likely damage	The comment is not related to the adequacy of the DEIR; thus, no further response is required in this document.
B4-55	Hansen, Kim	6/17/2024	3.16 Muni Code open space and rural objectives also violated	This assertion of inadequacy of the DEIR is unclear. Thus, no further response is required in this document. 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.
B4-56	Hansen, Kim	6/17/2024	3.19 All 4 criteria are forever and significantly impacted. Report does not acknowledge	Chapter 3.1 sufficiently details and discloses potential impacts on aesthetics per CEQA requirements.
B4-57	Hansen, Kim	6/17/2024	3.1 10 Enforcement compliance addition is needed. Currently insufficient and overwhelmed	The comment is not related to the adequacy of the DEIR; thus, no further response is required in this document.
B4-58	Hansen, Kim	6/17/2024	3.1 11 280 scenic vistas would be adversely affected. Disagree w impact statement which was not substantiated	Please see response to comment B4-52.
B4-59	Hansen, Kim	6/17/2024	3.1 12-13 ASRB future is uncertain, development standards have not been approved, requirements and enforcement of compliance inadequate- Mitigation measures should be proposed. Tree loss should be quantitated, and min amount lost defined and what are the impacts?	Please see response to comment B3-1 regarding the programmatic nature of the DEIR. As detailed on page 3.1-14, compliance with existing General Plan policies and Municipal Code regulations would minimize the potential for significant impacts to scenic resources within State-

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				designated highways. Associated impacts would be less than significant.
B4-60	Hansen, Kim	6/17/2024	3.1 16 What are the lighting requirements of apartments? Parking areas? Grounds? Discuss	As stated on page 3.1-16, 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.
B4-61	Hansen, Kim	6/17/2024	3.2 Measure existing air quality on site for extended impact on future residents. Mitigate measures? Filtration? Physical barrier?	As detailed on page 3.2-31, given that the operation of the Proposed Project would not exceed BAAQMD's significance thresholds, operational air quality impacts are less than significant. For construction, to ensure projects achieve consistency with the BAAQMD's construction screening criteria or, if consistency with the construction screening criteria cannot be demonstrated,

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				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.
B4-62	Hansen, Kim	6/17/2024	3.2 7 Monitoring station is too far away. Where is a closer one? Measure at property line closest to 280 for Raymundo site and measure cumulative	As stated on page 3.2-7, the nearest monitoring station to the Planning Area is the Redwood City Station, located approximately five miles northeast of the Planning Area.
B4-63	Hansen, Kim	6/17/2024	3.2 8 Recommends 280 high volume roadway analysis on for health risk. Of what? How measure? Not included	This means to include roadways in the operational TAC analysis. As stated on page 3.2-35, 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.
B4-64	Hansen, Kim	6/17/2024	3.2.9 What are mitigations for sensitive receptors? What are acceptable levels? What is Raymundo level of the 6 air pollutants?	As stated on page 3.2-34, 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

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				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. However, 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.
B4-65	Hansen, Kim	6/17/2024	3.2 17 General Plan and CAP seems to recommend air quality assessment for permit	The comment is not related to the adequacy of the DEIR; thus, no further response is required in this document.
B4-66	Hansen, Kim	6/17/2024	3.2 21 What about impacts and contributions to health of residents, after the construction phase?	See operational impacts on page 3.2-31.
B4-67	Hansen, Kim	6/17/2024	3.2 25 What air quality plan? What are the levels for Raymundo? When and who will test?	The current AQAP for the SFBAAB is the 2017 Clean Air Plan. See response to comment B4-64,
B4-68	Hansen, Kim	6/17/2024	3.2 27 Will 3 story and taller buildings be required to have solar? Include 3 story?	As stated on page 3.2-27, 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.
B4-69	Hansen, Kim	6/17/2024	3.2 33 Who will monitor and enforce? At what frequency? Needs to be more than at end of project	Please see response to comment B7-3 regarding enforcement. Additionally, a mitigation monitoring and reporting

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				program has been prepared detailing responsibility and timing for implementation of the mitigation measures included in this EIR.
B4-70	Hansen, Kim	6/17/2024	3.3 7 Raymundo project effect on special status species needs characterization before project approval. I'm also worried about loss of wildlife enclosure and fencing	Please see response to comment B4-31.
B4-71	Hansen, Kim	6/17/2024	3.3 15 Expand Open Space Element is totally violated. Will replacement open space be designated? Stanford at least replaces when they rob open space	With implementation of general plan policies and adherence to local regulations, as described under impacts 3.3-1 through 3.3-4, impacts of future development under the Proposed Project would be less than significant in regards to biological resources.
B4-72	Hansen, Kim	6/17/2024	3.3 16 biological resource impact is possible/probable, so CEQA is necessary	Please see response to comment B3-1 regarding the programmatic nature of the DEIR.
B4-73	Hansen, Kim	6/17/2024	3.3 26 Raymundo is seasonally a marshy area. Paving it over and its impacts will be analyzed how? What measurements and mitigations?	As stated on page 3.3-25, 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

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				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.
B4-74	Hansen, Kim	6/17/2024	3.6 2 Geo study necessary prior to permit approval due to soil properties	As detailed on page 3.4-20, 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.
B4-75	Hansen, Kim	6/17/2024	3.6 6 What data is had by Town re the fault trace that appears to be on the Raymundo site? Is there a map that shows all the hazards that are located on this and other sites? Seismic, flood, fire, geo? Shouldn't this be taken into consideration for setbacks (large for inferred fault- 125ft?) etc	Figure 3.4-2 shows the seismic hazards within the Planning Area. The data included on this map is derived from an update of the Town Geologic Map prepared by W.R. Dickison (1973), revised by J.C. Cummings (1975 and 1976) and William Cotton and Associates (1988, 1989, and 1992). Geologic data is based on limited ground reconnaissance, aerial photograph interpretation, and evaluation of published

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				<p>maps. The map also includes modifications to reflect the results of many of the unpublished, site-specific fault investigations submitted to the Town prior to December 2014. Alquist Priolo Special Study Zone data acquired through the Association of Bay Area Governments.</p> <p>See Figure 2.2 for other environmental hazards and constraints. Setback requirements are a function of hazards and other constraints.</p>
B4-76	Hansen, Kim	6/17/2024	3.6 8 Are there recorded slides and geo challenges on the Canada and High Rd sites?	See Environmental Setting starting on page 3.4-1 for information regarding existing geological hazards and constraints. Figure 3.4-1 shows the location of historic and Dormant Young landslides.
B4-77	Hansen, Kim	6/17/2024	3.6-9 What building construction improvements are required for building a 3+ story building on expansive soil?	As stated on page 3.4-21, 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

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				necessary to mitigate the probable effects of this hazard should be employed.
B4-78	Hansen, Kim	6/17/2024	3.6-12 Will fault mapping occur before permit issuance? It should be a requirement and have impact on setbacks, heights and construction requirements	As stated on page 3.4-19, the CBC 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.
B4-79	Hansen, Kim	6/17/2024	3.6-15 Section 152 will be updated to add requirements for geo report for re-zoning and MF zone for safety of residents? And to guide construction?	See Chapter 2, Project Description, for a discussion of proposed general plan amendments, zoning amendments, and objective design standards.
B4-80	Hansen, Kim	6/17/2024	3.6-18-19,20,21 Significant risks, as mentioned by this report calls for mitigation measures and building code compliance w Muni code and CBC- 125 ft set backs. This is significant and should affect guidelines and building compliance. Raymundo site. Mitigation Required. I totally disagree w the consultant's dismissal of risk to human and property. No ministerial review- must be more! Site specific hazards must be	Please see DEIR pages 3.4-18 through 3.4-21 for a discussion of impacts related to seismic and geologic hazards. Geologic impacts are analyzed adequately per CEQA requirements. Please see also response to comment B3-1 regarding the programmatic nature of the DEIR.

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			characterized before plan and building approved and commence. Construction requirements also to the standard if there is a decision to build on an unstable and environmentally sensitive parcel.	
B4-81	Hansen, Kim	6/17/2024	3.5-3 Is there a tree replant requirement? How many trees can be taken down? How many should be replaced?	As stated on page 3.3-13, the local tree protection regulations (Sections 153.430 – 153.439) establish minimum standards and requirements for the protection of trees.
B4-82	Hansen, Kim	6/17/2024	3.5 5 What water conservation measures and what about gray water for landscaping requirement to prevent exacerbation of Ca drought conditions? What water company will serve the Raymundo site and how does their fee structure work for apts?	As stated on page 3.9-14, 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. General Plan policies promote reduction of water usage and increased conservation of water resources.
B4-83	Hansen, Kim	6/17/2024	3.5 14 est VMT and flawed analysis does not take into consideration tris to basic services, such as grocery hospital. Bus stop is not walk or bike rideable. And conflicts w policy. Impact should not be dismissed!	As stated on page 3.7-3, 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

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				methodology and impact assessment performed by Parisi Transportation Consulting for the Proposed Project.
B4-84	Hansen, Kim	6/17/2024	3.5 16 When will CAP be updated?	Please see response to comment B4-36.
B4-85	Hansen, Kim	6/17/2024	3.5 17 423 units x 4 =1692 new residents	As stated on page 3.5-17, projected new population is calculated using the average household size of 2.72 persons in the Town of Woodside and accounting for vacancies. 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).
B4-86	Hansen, Kim	6/17/2024	3.5 22 Wouldn't the infill and Town Center approach build out be a mitigation that should be considered and listed here?	Please see chapter 4 regarding environmental impact analyses of the alternatives. Please see response to comment B2-2 regarding the environmentally superior alternative.
B4-87	Hansen, Kim	6/17/2024	3.5 26 What to be done for job creation?	The comment is not related to the adequacy of the DEIR; thus, no further response is required in this document.
B4-88	Hansen, Kim	6/17/2024	3.6-3 What is the 280 noise measurement at property line for Raymundo site. Unhealthy over extended period of time	As stated on page 3.6-18, 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

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				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
B4-89	Hansen, Kim	6/17/2024	3.7 Bus stop too far away- have you considered?	As detailed on page 3.7-11, transit service is provided by San Mateo County Transit District. 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.
B4-90	Hansen, Kim	6/17/2024	3.7.6 Multiple policy conflicts.	The comment does not assert anything specific related to the adequacy of the DEIR; thus, no further response is required in this document.
B4-91	Hansen, Kim	6/17/2024	3.7-9 10 What is this 15% reduction in VMT? VMT study flawed and assumptive Bus cannot turn around	As stated on page 3.7-10, 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 stated on page 3.7-9, the Town Code also provides road patterns and design guidelines

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				for developments which the Proposed Project must comply with. 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.
B4-92	Hansen, Kim	6/17/2024	3.9 What is the impact of construction of sewer? What is capacity of dump? Ox Mountain is full? We do not have 15 yrs of capacity. What is plan to underground utilities? Make sure that it is a requirement. Raymundo site is a seasonal bog- what are mitigations?	<p>Impact 3.9-1 details whether the Proposed Project 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, and whether there would be associated impacts. Please see also response to comment B12-1.</p> <p>See B4-73 regarding sensitive natural communities.</p> <p>Please see also response to comment B3-1 regarding the programmatic nature of the DEIR.</p>
B4-93	Hansen, Kim	6/17/2024	3.10 You have to include the fire protection agencies! What do their maps say? Raymundo Canada are in the WUI. We do not have trucks to service 3 story buildings. Will people die	Wildfire mapping was conducted using the most recent and accurate data available from CAL FIRE. See also response to comment B3-6.

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			because of these oversights? Who will pay? We need a design review process and zone requirements for Multi family.	
B4-94	Hansen, Kim	6/17/2024	4.2-3 Infill is the superior choice from an impact perspective. How do we scrap our current stupid plan and pursue what is best for people and the environment? Rezone the whole Town. That is fair.	Please see response to comment B2-2 regarding alternatives.
B4-95	Hansen, Kim	6/17/2024	4-14 This table is unreadable. Re do.	The comment is not related to the adequacy of the DEIR; thus, no further response is required in this document.
B5-1	Huhs, John and Renee	6/17/2024	<p>By way of introduction, our Family has lived at 117 Marva Oaks Drive, Woodside, since the completion of our home in 2008, and consists of: John (Father); Renee (Mother), John (Son 16) and Elisabeth (Daughter 14). We live approximately 250 yards upslope from the proposed Raymundo Site. Previously, John lived in Woodside (524 Moore Road) during the second half of the 60's while he was in grad school (JD/MBA) at Stanford.</p> <p>We have reviewed the comments submitted in opposition to the proposed EIR by our neighbors: Karen Offen; the Hansen Family; the Lubin Family, the Poletti Family; and the Alftin Family. We fully agree with their opposition, comments and observations; which we will not repeat here.</p> <p>We reiterate three of our numerous comments made in response to various draft Housing Elements and Town Council meetings considering same:</p> <p>1. Although the EIR (Page ES-2) states this EIR does not consider site-specific impacts, it in fact does try to “whitewash” the Raymundo Site. From about every legally-significant perspective, the Raymundo Site does not belong in this EIR. It is the wrong project, at the wrong place and at the wrong time. The only consideration favoring the Raymundo Site is that it is owned by the Town, which proposes to donate this site to a prospective developer. Other than these</p>	Thank you for your letter. Please see response to comment B3-1 regarding the programmatic nature of the DEIR. The remainder of the comment is not related to the adequacy of the DEIR; thus, no further response is required in this document.

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			bureaucratic-ease and subsidy considerations, this Site doesn't benefit the prospective residents and is very much against the best interests of the existing residents (who pay staff salaries and subsidies, and vote for Town Council Members). We believe our well-intentioned comments to date have been ignored, and we have been "thrown under the bus" for the sole purpose of bureaucratic efficiency.	
B5-2	Huhs, John and Renee	6/17/2024	2. John worked as a lawyer 40 years on Wall Street and, although he is not an environmental specialist, he is, of course, knowledgeable about environmental litigation. In his view, the present EIR is so legally defective, it should not survive the inevitable litigation challenge approval of the EIR would provoke. The approval of this EIR will result in the expenditure of judicial resources, residents' resources and Town resources in the endeavor to protect a Project that should not have been proposed in the first place.	The comment does not provide any substantiation for the claim that the analysis is deficient. The analysis in the DEIR is adequate and appropriate for a programmatic EIR.
B5-3	Huhs, John and Renee	6/17/2024	3. The "Infill Alternative" set forth on Page ES-5 appears to be a better alternative. Concentrating multifamily projects in commercial centers would be much more beneficial to our new neighbors, and to existing Town residents. Although pursuing this alternative would result in some delay, the end result would be well worth it. We look forward to discussing our Point 3 above at the next Town meeting on this subject.	Please see response to comment B2-2 and B4-20 regarding alternatives.
B6-1	Lubin, Steve	6/16/2024	The EIR states "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 Housing Element as proposed is not likely to provide the projected affordable housing and it will not be sensitive to the historic character of the Town.	Thank you for your letter. The Project will be sensitive to the historic character of the Town. As stated on page 3.1-15, implementation of the Proposed Project would be required to comply with applicable zoning and other regulations governing visual character. Such regulations include proposed Objective Design Standards (ODS), the General Plan, and the Town of Woodside Design Guidelines. Compliance with existing

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				<p>regulations and Proposed Project actions would help reduce impacts of new development and impacts would be less than significant. Please see also response to comment B1-7 regarding ODS.</p> <p>The remainder of the comment pertains to the Proposed Project and is not related to the adequacy of the DEIR; thus, no further response is required.</p>
B6-2	Lubin, Steve	6/16/2024	<p>Infill Alternative</p> <p>The “Infill Alternative” presented in the EIR would result in a reduced impact as stated in the EIR. This reduced impact alternative is the choice the Town should make. The necessity to hold an election to change town center zoning does not prevent this choice. There is a precedent for HCD approving a Housing Element which depends on a future vote of the citizens. HCD has certified the Housing Element of the City of Sausalito which includes future zoning changes that require a vote.</p> <p>https://www.sausalito.gov/home/showdocument?id=32446&t=638188850327852255 (page 13).</p> <p>The Skylonda area is not appropriate for increased housing intensity because of its remote location and unreliable road access.</p>	<p>Please see response to comment B2-2 and B4-20 regarding alternatives.</p>
B6-3	Lubin, Steve	6/16/2024	<p>The “infill Alternative” presented in the EIR only considers infill alternatives in the commercial areas of the Town. In addition to or along with the commercial area, an additional alternative with reduced impacts would add residentially zoned area close to the town center. Many infill opportunities exist in the area within walking or cycling distance of the town center. Infilling this area using expanded ADU opportunities would greatly reduce the VMT and integrate</p>	<p>Please see response to comment B2-2 and B4-20 regarding alternatives.</p>

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			<p>the affordable housing into the fabric of the Town rather than place it in distant, isolated, stigmatized locations as the Housing Element proposes. Infill development would also reduce the disruption of natural habitat by developing sites which have already been developed. I presented a detailed alternative approach to ADU permitting to the Planning Commission on 6/10/24 (attached). This approach would provide affordable housing opportunities and greatly reduce the VMT.</p> <p>Dismissal of infill alternatives would be a major flaw in the EIR and should be corrected.</p>	
B6-4	Lubin, Steve	6/16/2024	<p>Comments on Table ES-1</p> <p>3.1.1 “No substantial adverse effect on a scenic vista.” You’ve got to be kidding! The combination of visual impact of the Cañada Road, Raymundo and Cañada College projects will transform the visual impact from General Plan-designated scenic corridors Cañada Road and I-280.</p> <p>This impact would be very difficult or impossible to mitigate.</p> <p>3.1-3 The combination of the three projects mentioned above (or even any one of them) would have a major negative effect on the scenic quality of Cañada Road and I-280.</p>	<p>Please see response to comment B2-1 and B1-7 regarding ODS and impacts on visual character. In addition, as stated on page 3.1-14, multi-family development would be subject to ODS 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.</p>

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B6-5	Lubin, Steve	6/16/2024	<p>3.1-4 Any of the three projects mentioned above has the potential to create substantial light sources and harm the dark sky character of the area. Regulation of light sources should be required. Future housing cycles will require additional housing. Continuation of the trend of locating dense projects along scenic roads will have a cumulative negative impact.</p>	<p>As stated on page 3.1-16, 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. Future development would also be required to comply with Town Code and CBC standards. 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.</p>
B6-6	Lubin, Steve	6/16/2024	<p>3.3 The 773 Cañada Road site is a very active wildlife habitat harboring coyotes, bobcats, mountain lions, foxes, owls, deer, several species of squirrels, many insects, amphibians and a vast variety of reptiles. Impact on this habitat should be carefully assessed. The parcel contains grassland, oak woodland, chaparral and riparian habitats. It is a unique resource in the Town.</p> <p>3.3-4 773 Cañada Road almost certainly contains wildlife nursery sites.</p>	<p>Please see response to comment B3-1 regarding the programmatic nature of the DEIR. Impacts on special-status species are analyzed under Impact 3.3-1, impacts on riparian habitats or sensitive communities are analyzed under Impact 3.3-1, and impacts on native wildlife nursery sites are analyzed under Impact 3.3-4.</p>
B6-7	Lubin, Steve	6/16/2024	<p>3.4 The High Road site has experienced significant slope instability and could require major mitigation measures. The Raymundo site is adjacent to the Hermit Earthquake fault.</p>	<p>Please see DEIR pages 3.4-18 through 3.4-21 for a discussion of impacts related to seismic and geologic hazards. Please see response to comment B3-1 regarding the programmatic</p>

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				nature of the DEIR. Please see also response to B6-8.
B6-8	Lubin, Steve	6/16/2024	3.5 The project concentrates development far from town center and requires unnecessary driving. The additional traffic will discourage non-motorized means of transformation. This will create a vicious cycle of increasing greenhouse gas emissions.	Please see response to comment B1-5 regarding landslide impacts. Further, as stated on page 3.4-19, CBC 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.
B6-9	Lubin, Steve	6/16/2024	3.6 The project would expose residents of the proposed multi-family housing to sound levels that exceed the Town's standards. All four of the multi-family sites are located in areas where the ambient noise level (mapped in the General Plan) exceeds the maximum level established in the General Plan (55 Ldn (Exterior)). All but the Cañada College site exceed 70 Ldn. The uphill locations of 773 Cañada Road and Cañada College make mitigation extremely difficult.	As stated on page 3.6-18, 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

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B6-10	Lubin, Steve	6/16/2024	<p>3.7 -1 The additional traffic induced by the project will have a negative effect on the comfort and safety of popular bicycle, pedestrian and equestrian routes on Cañada and Woodside Roads.</p> <p>The Town should encourage SamTrans to alter the route of its line 278 so it returns from Cañada College to Redwood City via Cañada Road rather than I-280. This would create 1/2-hour frequency bus service available to a large portion of the Town's populace and to future housing placed close to the town center.</p>	<p>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.</p> <p>As stated on page 3.7-9 of the DEIR, new development under the Proposed Project would be required to comply with General Plan policies and Town Code regulations. This includes Circulation Element goals to maintain safe roadways and the Town Code road patterns and design guidelines. As a result, future development consistent with the Proposed Project would not conflict with a program plan, ordinance or policy addressing the safety of the circulation system.</p> <p>As detailed on page 3.7-11, transit service is provided by San Mateo County Transit District. 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.</p>

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B6-11	Lubin, Steve	6/16/2024	<p>3.10 The 773 Cañada Road site is within and the Raymundo site is adjacent to areas rated Very High Fire Hazard Severity zones by the State Fire Marshall:</p> <p><https://experience.arcgis.com/experience/03beab8511814e79a0e4eabf0d3e7247/.</p> <p>The 773 Cañada Road site is mapped “Very High Severity Fire Hazard Zone in the Town’s General Plan. The June 2022 Edgewood Fire was perilously close to these sites. They were spared by the almost windless day and the intense response of CalFire involving an attack by airtankers, helicopters and ground crews.</p>	<p>As detailed on page 3.10-19, several sites proposed for development do fall into or are adjacent to High and Very High Fire Hazard Severity Zones within the Town limit. However, 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.</p>
B6-12	Lubin, Steve	6/16/2024	<p>3.1-3 Construction of the 773 Cañada Road project would require construction of a new road. This road would require a crossing of a riparian area, substantial grading and disturbance of habitat.</p>	<p>Please see response to comment B3-1 regarding the programmatic nature of the DEIR.</p>
B6-13	Lubin, Steve	6/16/2024	<p>773 Cañada Road: The project includes development of approximately 10 acres, not 5 as stated.</p> <p>Since development of all 10 acres is anticipated in connection with the housing project the entire site should be considered in the EIR.</p> <p>The owner has submitted a subdivision map which anticipates rezoning the 10 acres from the current SR (1 acre). 1.75 acres is proposed to be zoned Multi Family (20 units/acre) and the balance of the property is proposed to be zoned R1 (20,000 sf).</p> <p>The appendix states “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</p>	<p>The comment pertains to the Proposed Project and is not related to the adequacy of the DEIR; thus, no further response is required in this document.</p>

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			agreements.” This statement should be confirmed directly with the owner.	
B6-14	Lubin, Steve	6/16/2024	High Road: The appendix states, “the site is does not have any identified environmental constraints” The site has significant geologic constraints and is adjacent to a high-pressure gas transmission line with significant explosive potential.	Please see response to comment B3-1 regarding the programmatic nature of the DEIR. Please see also response to comment B1-4 regarding the gas transmission line. Geologic impacts are analyzed in chapter 3.4.
B6-15	Lubin, Steve	6/16/2024	<p>Page 20</p> <p>“As shown on Figure 4, all the higher density housing sites and several small-scale sites would be located within established Scenic Corridors. Further, three of the higher density housing sites (Raymundo Drive at Runnymede Road, 773 Cañada Road, and Cañada College) and several sites identified for small scale residential projects are located adjacent to State-designated Scenic Highways. Development in these locations would be subject to review for compliance with standards established in the Municipal Code to the extent they apply, including the evaluation criteria related to site planning, building design, and landscape elements in Sec. 153.915 (D).”</p> <p>The multifamily sites will not be subject to existing Town regulations.</p>	As stated on page 3.1-14, multi-family development would be subject to ODS 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.
B6-16	Lubin, Steve	6/16/2024	“ Additionally, the Town intends to adopt objective design and development standards for multifamily development which would apply to the four higher density sites; however, as these standards have not yet been adopted, there is potential for impacts to scenic vistas and corridors from buildout of the Proposed Project, as well as impacts related to conflicts with regulations governing scenic quality and light and glare. These potential impacts will be analyzed in detail in	Objective Design Standards (ODS) are detailed on page 2-15 and considered in the impact analyses in Chapter 3.1 Aesthetics and Visual Resources.

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			<p>the EIR, and mitigation will be recommended to address impacts, as appropriate.”</p> <p>I don’t see this analysis in the EIR.</p> <p>Thank you for considering my comments.</p>	
B7-1	Mah, Maggie	6/16/2024	<p>First of all, it should be said that the cumulative effect of all Environmental Impact Reports has been to provide vocational opportunities for people who are not affected by either the consequences of their findings or their ridiculous and unenforceable “mitigations?” This one is no exception. It also fails to address the impacts to adjacent trails, San Mateo County and GGNRA lands as well as true quality of life issues for the existing residents in the proposed areas. The comments below address just two of the report’s sections.</p>	<p>Impacts were analyzed for the Planning Area, which includes the Town of Woodside, on topics that are required per CEQA standards. In addition, cumulative impacts for adjacent to the Planning Area are analyzed in Chapter 5. The remainder of the comment is not related to the adequacy of the DEIR; thus, no further response is required in this document.</p>
B7-2	Mah, Maggie	6/16/2024	<p>Re: Section 3.1 Aesthetics</p> <p>The report finds no significant impact on scenic vistas and requires no mitigation. How can clusters of two-story structures constructed on previously open land not have an impact? How can it be found that construction of this magnitude does not damage scenic resources, or degrade the visual charm of public views? How can construction of 40-50 two story structures NOT have a substantial impact on light emissions? How can this report be valid relative to design standards that have not been adopted? Have the people who wrote this EIR driven down 280 and seen what two huge and unfortunately built single family houses have done to the scenic corridor? I’m guessing they decided the impacts were so great that nothing could be done. Better to say it’s fine and hope it goes away?</p>	<p>As stated on page 3.1-14, multi-family development would be subject to ODS 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. Overall, with implementation of General Plan policies and existing Town regulations in place, substantial adverse effects on scenic vistas in</p>

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				the Planning Area would be minimized to the extent practicable and associated impacts would be less than significant.
B7-3	Mah, Maggie	6/16/2024	<p>Re: Section 3.2 Air Quality</p> <p>The mitigations are directed toward air quality emissions during construction and involve mitigation such as watering twice daily to minimize dust, restrictions on idling time and “completion as soon as possible.” Who monitors these things? How do you define, “as soon as possible.” You could literally drive a truck through these and many other supposed mitigations in this report.</p>	<p>The Proposed Project’s Mitigation Monitoring and Reporting Program (MMRP) has been prepared in conformance with Public Resources Code Section 21081.6(a)(1) which requires a lead or responsible agency that approves or carries out a project subject to the California Environmental Quality Act (CEQA) to adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment. The MMRP describes the procedures that will be used to implement the mitigation measures adopted in connection with the approval of the Proposed Project and the methods of monitoring such actions. A monitoring program is necessary only for impacts which would be significant if not mitigated.</p>
B7-4	Mah, Maggie	6/16/2024	<p>Re: Infill Alternative, I believe that the option of changing the zoning in the Town Center to allow residential use is one of the few useful sections of this report. It’s the way to go and should have been seriously considered previously.</p> <p>Finally, I would like to request a brief explanation of how the policies of the General Plan relate to the RHNA requirements. Looks to me like they are toast but I hope I’m wrong.</p>	<p>Please see response to comment B2-2 and B4-20 regarding alternatives.</p>
B8-1	Offen, Karen	6/17/2024	<p>The stated purpose of this EIR is “to balance environmental, economic, and social objectives,” but pays minimal attention to the “economic and social” aspects of the neighborhood as concerns the existing residents of this area, which have been repeatedly voiced and, it seems, repeatedly ignored. More</p>	<p>Thank you for your letter. Please see response to comment B3-3 regarding public input. The remainder of the comment pertains does not provide specifics related to</p>

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			verbiage is provided to consider the impact (short-term but also long-term) of the Project on the bats and the Dusky-Footed Woodrat than is provided to address the concerns of the human residents of the area impacted.	the adequacy of the DEIR; thus, no further response is required in this document.
B8-2	Offen, Karen	6/17/2024	Some of us have owned property and may have lived here longer than any of the indicated threatened species. Most of us residents on Raymundo Drive feel quite threatened by the rezoning and potential construction of a sizeable urbanizing housing project at the base of our very rural and winding road, irrespective of whom it is being built for. Locations closer to the town center would be far more acceptable. "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." This does certainly not describe The Project, nor does it describe our town's future as envisioned in the EIR. This Project is ultimately about urbanization, which is what many of us have attempted – and so far succeeded - to escape from.	As stated on page 5-2, 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). This focus on infill development is consistent with Plan Bay Area 2050. The remainder of the comment pertains to the Proposed Project and is not related to the adequacy of the DEIR; thus, no further response is required in this document.
B8-3	Offen, Karen	6/17/2024	Action item: factor into the EIR the continuing concerns of the surrounding neighborhoods, including mental health, safety, and (not least, being a socio-economic issue) threats to rural residential property values. This should have been done via interviews, as is often the case for EIRs. The comments in appendix (Report, vol. 2) seem very limited and selective, given how many different people have made public comments and have written letters to the Town.	Please see response to comment B3-3 regarding public input.
B8-4	Offen, Karen	6/17/2024	This draft EIR literally embeds the Raymundo Drive site (aka APN 072-041-040) as destined for rezoning for multi-family housing, which would focus on low/very low income housing (currently set at 12 units out of 17; 5 are currently allotted to moderate income families), despite of and over the objections of the residents of this street in the northern part	The comment pertains to the Proposed Project and is not related to the adequacy of the DEIR; thus, no further response is required in this document.

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			<p>of Woodside to any housing development whatsoever. In sec. 2.11 of the report, it indicates that this parcel would be “for the construction of workforce housing.” Does this suggest rental housing? Or condominium ownership? Would preference be given to workers who are employed in Woodside? I do recognize the need for affordable housing that would serve those who are employed in Woodside, but it should be closer to the town center so the residents could actually walk to work – at the school, at the fire department, at town hall, at the local restaurants, etc. That would also free up the parking lots in town for customers, as the one-time commuters could leave their cars at home.</p>	
B8-5	Offen, Karen	6/17/2024	<p>1. In either case (rental or purchase), the EIR pays no attention to considerations of potential traffic bottlenecks at the intersection of Raymundo (a dead-end street with only one outlet) and Runnymede, especially in case of fire or earthquake emergencies. No consideration is given to providing an alternate emergency evacuation route for those who, like me, live upstream from this site, and the horseowners evacuating their horses with trucks pulling horse trailers who would be blocked behind traffic (potential minimum of 34 vehicles, 17x2) exiting this multi-family housing. We might all foreseeably perish in wildfire flames just because we are stuck in traffic (as during the recent Paradise fire). Our concerns as residents of Raymundo Drive have been presented in multiple public hearings, written comments to the Town Council, and in the press. The Town, which inadvertently owns this site (an artifact of the construction in the 1970s of the interstate highway, which lies immediately to the East) refuses to remove this site from consideration, despite formal deed restrictions on its use and, more generally, its being a very unfortunate site for multi-family housing. In particular, the site does not meet any of the criteria for urban infill, near transportation, stores and</p>	<p>Please see response to comment B1-1 regarding traffic. Please see also response to comment B1-3 regarding evacuation. The remainder of the comment pertains to the Proposed Project and is not related to the adequacy of the DEIR; thus, no further response is required in this document.</p>

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			shops, etc., that were set out in the earlier RHMD documents. Action item: These concerns should be expressly stated and acknowledged in the EIR. This property, now zoned as Open Space, should absolutely not be subjected to rezoning as residential/Multi-family.	
B8-6	Offen, Karen	6/17/2024	<p>2. The draft EIR also pays no attention whatsoever to the property on the northern edge of this parcel, which is labeled on the report’s maps labeled as “Rural Midcoast (unincorporated)”. This area MUST be relabelled on all maps as the property of the San Francisco Water Department/ Hetch Hetchy Regional System (Service of the San Francisco P.U.C.) It is protected open space with a large fence around it and nasty “no trespassing” signage up and down the Crystal Springs Trail (San Mateo County Parks). At the Runnymede intersection, the trail is immediately adjacent to the Raymundo property in question here and runs all the way up the hill right through the watershed land as a fire break and utility road, before it rejoins Raymundo Drive near the Marva Oaks intersection and descends into Huddart Park. The Sand Hill trail (parallel to the freeway I-280) also abuts on this town property. Hikers and horses are frequent users of these trails.</p> <p>Here are two more government agencies that should be consulted about this project. To the west of this San Francisco watershed property is the Pflieger property, acquired by POST several decades ago, and now incorporated into the Golden Gate National Recreation Area (GGNRA). It is presently “off-limits” to trespassers. In short, state, county, city and federal land lies next to or near the Raymundo portion of the proposed Project.</p> <p>Action Item: As a minimum, this area on the maps needs to be accurately labeled – and these agencies listed among those who would have an interest in what happens to this property. These concerns should be expressly addressed in</p>	The comment does not relate to the adequacy of the analysis in the DEIR. The Town notes that the figures in the DEIR are labelled in a manner consistent with maps in the Town of Woodside General Plan. Further, responsible and trustee State and local agencies were notified of the Proposed Plan pursuant to CEQA, as noted on pages 1-5 through 1-6 of the DEIR. Additionally, the Town has noticed public agencies and property owners regarding proposed rezoning related to Housing Element implementation.

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			<p>the EIR; a) the labeling on all the maps should be corrected, and b) the three agencies mentioned above should be added to the list of concerned agencies – and (c) they should be contacted directly – and immediately -- for their written assessments of the proposed Project, in particular the Raymundo part of the Project, which is immediately adjacent to their lands.</p>	
B8-7	Offen, Karen	6/17/2024	<p>3. As indicated in the draft ERI, the Woodside General Plan indicates:</p> <p>Goal LU1: Preserve and enhance Woodside as a scenic, rural residential community</p> <p>Policy LU1.5 – Thoroughly evaluate changes to parcel boundaries</p> <p>Policy LU1.8 – Encourage, plan parks and recreation in keeping with the rural setting</p> <p>Goal OS1: Conserve, protect, and enhance open space system</p> <p>Policy OS1.4 – Preserve open space for the Protection of Public Health and Safety</p> <p>These goals and policies still represent the thinking of most Woodside residents; they should absolutely not be set aside.</p> <p>Action item: Vote against changes in the General Plan</p>	<p>As stated on page 3.1-15, to integrate housing as need to meet is RHNA obligations under State law, the Proposed Project involves the adoption of Objective Design Standards (ODS) for each multi-family housing site to ensure new 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. 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.</p>

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B8-8	Offen, Karen	6/17/2024	<p>Finally, there is the issue of Habitat Connectivity (see 3.3-3 in the EIR). Our area of Woodside is colored shocking pink on these maps, indicating “Conservation planning landscapes.” Multi-family housing is the very antithesis of this. Many people on this street and others have built high fences to keep wildlife off their properties. I, on the other hand, welcome wildlife and have – for purposes of fire prevention, mainly – cleared brush and flammable materials from my acreage, which has at the same time become a wildlife corridor from Huddart Park and Raymundo Drive into the GGNRA and Hetch Hetchy Watershed lands, and via Marva Oaks, into the Runnymede Sculpture garden. This precious access must be preserved at all cost. Changing the zoning of this town-owned parcel at the bottom of Raymundo Drive in order to build urban housing does not lend itself to furthering the preservation of open space in this critical area next to the governmentally-protected wider open spaces that protect our water supply and provide ongoing habitat for our wildlife.</p> <p>Action item: Protect Habitat Connectivity ; encourage conservation easements (the Town needs to rethink its reluctance to support these).</p>	<p>As stated on page 3.3-27, the Planning Area is located in areas with habitat connectivity. 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. With implementation of these policies and adherence to local regulations, 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.</p>
B8-9	Offen, Karen	6/17/2024	<p>4. Concerning 5.1 in the EIR, re: projected population growth in Woodside from now into 2031.</p> <p>This chart projects a 19.5% (nearly 20%) growth in the population of Woodside between now and the year 2031.</p> <p>Such a population increase during Phase 6 would result in the complete destruction of everything Woodside stands for – everything current residents want to protect and everything that new families in town seeking quieter living and rural environments, wildlife, etc., desire when they buy property in the Town of Woodside. Moreover, it would change the voting population and possible outcomes that do not reflect the</p>	<p>Regarding the discussion of impacts to public schools in the DEIR, please see response to comment B8-10. The remainder of this comment pertains to the Proposed Project and is not related to the adequacy of the DEIR; thus, no further response is required in this document.</p>

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			<p>values we currently cherish and uphold, which are embedded in and so well-stated in our General Plan.</p> <p>The State of California is wrong-headed in its effort to urbanize every single municipal entity in the state. This approach, while perhaps well-meant in the beginning, is completely unacceptable, especially to small rural residential town like ours. "Social Justice" cannot be achieved by fiat – or by building "affordable" apartment complexes on the edge of, or next door to, larger and precious parcels of residential country homes – and wild, open land.</p> <p>Finally, and not least: the EIR indicates that there is only one school in Woodside. I beg to differ.</p> <p>Woodside High School is also located in Woodside. The school's website provides this address:</p> <p>3;;"Ejwtejknn"Cxg."Yqqfukfg."EC";6284</p> <p>In Conclusion: I also support the observations made and concerns expressed by Steve Lubin and Kim Hansen, Susan Poletti, and others about this draft EIR. I trust that the Planning Commission and the Town Council members will CAREFULLY study this document and our public comments and reflect on the immense weight of the decisions they are about to make as to our future.</p> <p>s/Karen Offen</p>	
B8-10	Offen, Karen	6/17/2024	<p>The State of California is wrong-headed in its effort to urbanize every single municipal entity in the state. This approach, while perhaps well-meant in the beginning, is completely unacceptable, especially to small rural residential town like ours. "Social Justice" cannot be achieved by fiat – or by building "affordable" apartment complexes on the edge of, or next door to, larger and precious parcels of residential country homes – and wild, open land.</p>	<p>As stated in the Initial Study, which was included as Appendix A of the DEIR, the Town of Woodside is also located within the Sequoia Union High School District, where public school students from Woodside attend Woodside High School, located in unincorporated San Mateo County by Woodside Road and Alameda de las Pulgas. The total enrollment at Woodside High School for the 2020-2021 school year was</p>

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			<p>Finally, and not least: the EIR indicates that there is only one school in Woodside. I beg to differ.</p> <p>Woodside High School is also located in Woodside. The school's website provides this address:</p> <p>3;;"Ejwtejknn"Cxg."Yqqfukfg."EC";6284</p> <p>In Conclusion: I also support the observations made and concerns expressed by Steve Lubin and Kim Hansen, Susan Poletti, and others about this draft EIR. I trust that the Planning Commission and the Town Council members will CAREFULLY study this document and our public comments and reflect on the immense weight of the decisions they are about to make as to our future.</p>	<p>1,909 students (Sequoia Union High School District, 2022). 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.</p>
B9-1	Poletti, Sue	6/17/2024	<p>The stated purpose of the EIR is "to balance environmental, economic, and social objectives," however the selected Raymundo site does not meet this criteria.</p> <p>The project will be butted up against the 280 freeway and have you stopped to consider the amount of noise the inhabitants would be exposed to 24 hours a day?</p>	<p>Thank you for your letter. As stated on page 3.6-18, 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 impacts on the ambient noise level in the Town require mitigation. 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</p>

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				<p>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.</p> <p>The remainder of the comment pertains to the Proposed Project and is not related to the adequacy of the DEIR; thus, no further response is required in this document.</p>
B9-2	Poletti, Sue	6/17/2024	<p>The Raymundo site is simply at the far end of town, alienating people that you were supposed to incorporate and involve within the town. You were supposed to make them feel welcome, instead you have shoved them to the end of town, out of sight out of mind.</p> <p>It's an hour long walk from the Raymundo site to the town center specifically the local grocery store, elementary school, church, or library. A child walking to and from school would have to allow two hours of time out of their day. Had a site in Town Center been selected, the child would have a 15-minute walk or less to and from school.</p>	<p>The comment is noted. The comment pertains to the Proposed Project and is not related to the adequacy of the DEIR; thus, no further response is required in this document. Please see also response to comment B3-1 regarding the programmatic nature of the DEIR.</p>
B9-3	Poletti, Sue	6/17/2024	<p>The Raymundo site is built next to or on a fault line.</p>	<p>As stated on page 3.4-19, CBC 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</p>

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				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.
B9-4	Poletti, Sue	6/17/2024	The Raymundo site is located in a very high fire district. Most, if not all, of us on Raymundo have lost our fire insurance and are now reliant on the California Fair Plan which does not cover the real cost of property if lost.	As detailed on page 3.10-19, several sites proposed for development do fall into or are adjacent to High and Very High Fire Hazard Severity Zones within the Town limit. However, 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.
B9-5	Poletti, Sue	6/17/2024	The Raymundo site coupled with the 773 Cañada and Canada College sites places all the mid and low income projects next-door to one another, creating a ghetto if you will by placing everybody in the same area. These projects were meant to be spread throughout town and meant to be close to the Town Center and Town amenities.	The comment pertains to the Proposed Project and is not related to the adequacy of the DEIR; thus, no further response is required in this document.
B9-6	Poletti, Sue	6/17/2024	We understand that the Town does not currently allow three story buildings in the Town Center. However, if with just a stroke of a pen, it is easy to change the zoning of the Raymundo site from Open Space to Multifamily in order to plan three story buildings on that site, then it should be just as easy with the stroke of a pen to all change a two-story height restriction in Town Center to three stories.	The comment pertains to the Proposed Project and is not related to the adequacy of the DEIR; thus, no further response is required in this document.

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B9-7	Poletti, Sue	6/17/2024	Has the fire department been a part of this planning? It is my understanding that our local fire department does not own a firetruck equipped with a ladder that would reach a three-story building. In light of the two apartment fires last week in Redwood City and San Carlos, an apartment fire is something to consider and one which our Town is not equipped to handle.	Please see response to comment B3-6.
B9-8	Poletti, Sue	6/17/2024	The Conservation and Open Space Committee was not contacted nor aware that Open Space would have to be sacrificed and rezoned for Multi Family zoning.	Please see response to comment B3-3 regarding input on the DEIR.
B9-9	Poletti, Sue	6/17/2024	The Raymundo site does nothing in the way of helping the existing homeowners living on Raymundo and Marva Oaks. In fact, building three-story apartment buildings at the corner of Raymundo and Runnymede is a detriment to the people living on Raymundo and Marva Oaks. In a wildfire, those trying to evacuate with trucks and horse trailers will most certainly find themselves stopped at a choke point as the apartment dwellers also try to evacuate at the same time. There is only one way in and one way out for the homeowners living on Raymundo and Marva Oaks. There is no second escape route. To jeopardize their lives and their safety is unconscionable.	Please see response to comment B1-3 regarding evacuation.
B9-10	Poletti, Sue	6/17/2024	Runnymede and Raymundo are home to horse trails that are well ridden on a daily basis. To jeopardize the safety of horseback riders especially along Runnymede is also unconscionable. More traffic along Runnymede and Raymundo is a horse accident and lawsuit just waiting to happen.	As stated on page 3.7-9 of the DEIR, new development under the Proposed Project would be required to comply with General Plan policies and Town Code regulations. This includes Circulation Element goals to maintain safe roadways and the Town Code road patterns and design guidelines which provide safety standards. As a result, future development consistent with the Proposed Project would not conflict with a program plan, ordinance or policy addressing the safety of the circulation system.

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B9-11	Poletti, Sue	6/17/2024	For many decades, the Town of Woodside upheld its scenic corridor, rules and regulations. Often the scenic corridor rules and regulations were punitive to folks who wanted a lovely entrance gate or a certain aesthetic at their home. Now with a stroke of a pen and at the whim of the Planning Commission, the scenic rules and regulations will be thrown out, totally ignored, and three-story apartments located within short setbacks, and located right on the scenic corridor will be allowable. To heck with the rules, you might as well completely eliminate the scenic corridor guidelines for all future projects for the sake of equal treatment.	As stated on page 3.1-14, multi-family development would be subject to ODS 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. 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.
B9-12	Poletti, Sue	6/17/2024	The Woodside General Plan states the following: 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	As stated on page 3.1-15, 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 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

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			<p>Policy OS1.4 – Preserve open space for the Protection of Public Health and Safety</p> <p>For decades, Town Council Members, Planning Commissioners, Environmental Committees, among others, have dedicated their time and effort to keep Woodside rural. To add three story apartment buildings on the Raymundo site goes against everything Woodside has fought to preserve. Don't we have a say in how we want our Town to look and feel? Afterall, the rural nature of our Town is the reason most of us chose to move here. To destroy our Town by urbanization, to obliterate Open Space for high density apartment buildings, is not what we want. The one size fit all mandate of the State is just not right. Everyone, including the State, knows it is not right, because it requires the use of FORCE by unconstitutional fines to implement. If it were such a good idea, why would the State have to use force?</p>	<p>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. 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.</p>
B10-1	Romano, Christina	6/16/2024	<p>Thank you for the opportunity to comment on the EIR Housing Element as it applies to 773 Canada Rd.</p> <p>If the property is to be rezoned for 20 units on 1.75 acres, then it would be good if the balance of the land be dedicated for open space. The land could then be enjoyed by those living in the 20 units and, if there were trail connectors to Glen Creg and West Maple roads, the community would benefit. The views from the upper property are lovely.</p> <p>Thank you for reviewing my comments.</p>	<p>Thank you for your letter. The comment pertains to the Proposed Project and is not related to the adequacy of the DEIR; thus, no further response is required in this document.</p>
B11-1	Thomsen, Stephan	6/17/2024	<p>I'm writing to share some of my comments on the Environmental Impact Report (EIR) for the Housing Element.</p> <p>I have many concerns that are not adequately addressed by this report or in Woodside's plan for the Housing Element.</p>	<p>Thank you for your letter. The comment does not provide specifics regarding what part of the DEIR is inadequate; thus, no further response is required in this document.</p>

Letter	Commenter	Date	Comment	Response
			<p>However, I will focus on four key concerns relating to the proposed site at the intersection of Runnymede Rd and Raymundo Dr:</p> <ol style="list-style-type: none"> 1. Wildfire safety and evacuation 2. Inadequate parking and increase in traffic on Runnymede Rd 3. Lack of viable public transportation 4. Negative impact to scenic corridor and untenable noise levels for future residents due to proximity to highway 280 	
B11-2	Thomsen, Stephan	6/17/2024	<p>Wildfire safety and evacuation</p> <p>Although the EIR acknowledges the presence of high fire hazard severity zones (VHFHSZ) in Woodside and outlines compliance with general fire protection standards and evacuation plans, it lacks detailed, site-specific strategies for the Raymundo site. The EIR mentions adherence to California Building and Fire Codes, including vegetation management and road width requirements for fire apparatus access, it does not provide a thorough analysis of the unique risks and necessary evacuation routes for the proposed three-story multi-unit dwelling. The report defers to general measures and future site-specific reviews, leaving a critical gap in safety assurances for the Raymundo site.</p> <p>Will there be adequate space for fire department vehicles to turn around at the site? I'm told that the Woodside Fire Protection district does not have a truck that can service 3-story buildings? What will be done in the event of an emergency at this site?</p> <p>I estimate that we could have as many as 60 residents living at this site. Safe emergency evacuation for those residents</p>	<p>Please see response to comment B3-1 regarding the programmatic nature of the DEIR. Please see also responses to comment B1-3 regarding evacuation and response to comment B3-6 regarding fire department equipment. In addition, as stated on page 3.10-9, Fire Code Chapter 10 addresses fire related means of egress, including fire apparatus access road width requirements. With adherence to existing codes and regulations, impacts on wildfire safety and evacuation would be less than significant.</p>

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			and for the residents of Raymundo and Marva Oaks up the hill is a serious concern that is not adequately addressed.	
B11-3	Thomsen, Stephan	6/17/2024	<p>Inadequate parking and increased in traffic on Runnymede Rd</p> <p>The EIR makes no mention of the plan to accommodate vehicle parking for a new residents. Sixty residents could easily result in a parking space requirement for 25 cars or more. Where will these cars park? On the town-owned site for the new building? On Runnymede?</p> <p>The EIR mentions a projected increase in traffic of 36.7%. We already have traffic problems on Runnymede with people driving excessive speeds. How is any of this consistent with the stated objectives for preserving the rural character of Woodside?</p>	Please see response to comment B1-1 regarding traffic. The remainder of the comment pertains to the Proposed Project and is not related to the adequacy of the DEIR; thus, no further response is required in this document.
B11-4	Thomsen, Stephan	6/17/2024	<p>Lack of viable public transportation:</p> <p>The EIR mentions SamTrans Route 278, which has a stop at Canada College. That stop is 2.5 miles from the proposed building site. How is this a viable solution for low income families who may not have their own vehicles? Even if there were a new bus stop at the intersection of Runnymede and Cañada Rd, the walking distance to that location is nearly one mile. There is not adequate space for public busses to drive down Runnymede.</p>	As detailed on page 3.7-11, transit service is provided by San Mateo County Transit District. 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.
B11-5	Thomsen, Stephan	6/17/2024	<p>Negative impact to scenic corridor and noise for future residents due to proximity to high 280</p> <p>The proposed Raymundo site would be visible from highway 280 and would have a significant visually detrimental impact on the natural beauty of this section of 280, which is designated a scenic corridor, both during daytime and at night due to light pollution. Conversely, the proposed building site is very close to highway 280. Freeway noise for future residents so close to 280 would be untenable. The decibel readings in the EIR are low? What time of day were they taken? It is</p>	As stated on page 3.1-14, multi-family development would be subject to ODS 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.

Letter	Commenter	Date	Comment	Response
			<p>impossible to have a conversation at that site mid-morning using a normal voice. Would a sound barrier be required to make the location reasonably habitable? What would the additional visual impact be of such a sound barrier?</p> <p>In my opinion underlying goal of the housing element is to provide lower income families and individuals with not only affordable, but also practical and desirable locations to live. The Raymundo site will fall short of that goal for the reasons I've mentioned above.</p> <p>Please share my comments as appropriate.</p>	<p>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. Please see response to B6-5 regarding light and glare.</p> <p>As stated on page 3.6-18, 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.</p>
B12-1	Alftin, Jenine	6/17/2024	<p>I am writing to express my strong opposition to the proposed amendment of the Zoning Map designation for Assessor Parcel Number (APN) 072-041-040 (Raymundo Drive) from Open Space {OS} to Multi-family. While there are numerous reasons for my opposition, I wish to focus specifically on the issue of sewer infrastructure in this letter.</p> <p>The draft Environmental Impact Report (EIR) fails to accurately describe the situation or the potential impacts of constructing waste management facilities at the Raymundo</p>	<p>Thank you for your letter. As stated on page 3.9-16, 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). Based on the estimated average sewer flow per residence from a 2023 Sewer Rate Study</p>

Letter	Commenter	Date	Comment	Response
			<p>location, particularly in Section 3.9. Despite repeated controversy surrounding sewer access (notably omitted in Section 1.2 Utilities), the addition of sewer lines has not been adequately addressed or considered in terms of the environmental and economic challenges it poses to introducing high-density housing to Raymundo Drive.</p>	<p>conducted by the Town, the EIR projects that these projects would increase wastewater flow by 4,950 gpd, which is well within the remaining TCSAD capacity of 60,000 gpd. Accordingly, the EIR appropriately determined that impacts related to the construction or relocation of new or expanded Town wastewater treatment facilities, and impacts would be less than significant.</p> <p>Additionally, the following edit is hereby made to the last paragraph on page 3.9-16 of the DEIR to further clarify the associated analysis:</p> <p>DEIR p. 3.9-16:</p> <p>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 <u>Proposed developments at these locations would be required to install new sewer lines within the street network to serve project needs. Final sizing of particular lines will be subject to modeling of the system that must rely on demand 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 conveyance infrastructure. Therefore, the environmental</u></p>

Letter	Commenter	Date	Comment	Response
				<p><u>impacts related to construction period traffic, noise, air quality, and GHG emissions have been considered throughout this EIR at a programmatic level.</u> The Proposed Project anticipates 16 units on 773 Cañada Road and 17 units on Raymundo Drive for a total of 33 units.</p> <p>This clarification does not change the significance of the impact, and therefore does not constitute significant new information requiring recirculation pursuant to CEQA Guidelines section 15088.5.</p>
B12-2	Alftin, Jenine	6/17/2024	Currently, there is no existing sewer infrastructure at the Raymundo location. The proposal to install a medium sewer main with a 24-inch pipe along Runnymede Road, which serves as the sole access route to our homes, would incur extensive costs for repaving and could potentially disrupt our community and put our safety at risk in case of an emergency evacuation. Additionally, the necessary addition of water mains, PG&E lines, and internet infrastructure further compounds these challenges.	Please see response in comment B12-1. conveyance infrastructure. Further, page 3.9-19 states that 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. Therefore, it is anticipated that the Proposed Project would not require or result in the relocation or construction of new or expanded telecommunications facilities.
B12-3	Alftin, Jenine	6/17/2024	The construction of new sewer lines spanning approximately half to two-thirds of a mile along Runnymede Road would have significant environmental impacts, cause disruptions, and impose substantial economic costs. While the EIR indicates existing wastewater treatment capacity, it fails to address the critical need for infrastructure that currently does not exist.	Please see response in comment B12-1.
B12-4	Alftin, Jenine	6/17/2024	The financial burden of these necessary sewer constructions is estimated to be between \$2-3 million. Moreover, recent discussions at town council meetings indicate that sewer rates in Woodside are already rising. Furthermore, the	Any potential seismic impacts from development are addressed in Chapter 3.4. The remainder of the comment pertains to the Proposed Project and is not related to

Letter	Commenter	Date	Comment	Response
			seismic vulnerability of the proposed waste lines raises additional concerns.	the adequacy of the DEIR; thus, no further response is required in this document.
B12-5	Alftin, Jenine	6/17/2024	<p>Several questions remain unanswered:</p> <ul style="list-style-type: none"> - What is the actual cost? -Are there estimates to install a sewer? - Who will be responsible for the cost to install and maintain the sewer? - Has there been an environmental report on the impact of installing a sewer? - Where is the analysis of these findings? 	Please see response to comment B3-1 regarding the programmatic nature of the DEIR. The programmatic impact of development under the Proposed Project on local conveyance facilities is analyzed under Impact 3.9-1.
B12-6	Alftin, Jenine	6/17/2024	<p>It would be premature to vote in favor of amending the zoning code without a complete analysis of cost, impact, and fiscal responsibility.</p> <p>If this EIR sets a precedent for future projects, it is crucial that the environmental and financial implications of infrastructure construction are not overlooked, nor should existing residents be unfairly burdened with these exorbitant costs due to a sub-par building site that was decided upon using insufficient information.</p> <p>In conclusion, I urge the members of the Planning Commission to consider the serious implications of the proposed zoning amendment on our community, particularly regarding sewer infrastructure. I respectfully request that these concerns be thoroughly addressed before any decisions are made regarding the future development of Raymundo Drive.</p> <p>I urge the Planning Commission to make a recommendation to the Town Council to reject the Final EIR and to deny the entitlements outlined in the project description.</p>	The comment is not related to the adequacy of the DEIR; thus, no further response is required in this document.

Letter	Commenter	Date	Comment	Response
			Thank you for considering my viewpoint on this matter. I look forward to your response.	

3 Revisions to the Draft EIR

This chapter lists revisions to the Draft EIR by chapter and page, in the same order as the revisions would appear in the Draft EIR. New text is indicated with an underline in red and deleted text is indicated with ~~striketrough~~.

Executive Summary

Table ES-1 is hereby amended as follows:

Table ES-1: Summary of Impacts and Mitigation Measures			
Impact	Mitigation Measures	Significance before Mitigation	Significance after Mitigation
3.3 Biological Resources			
<p>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.</p> <p>However, with implementation of Mitigation Measures BIO-1 through BIO-10, the impacts of future development under the Proposed Project on special-status species would be less than significant.</p>	<p>MM-BIO-4: Disturbance to Bat Species. If required pursuant to pre-construction surveys <u>In areas where there is suitable habitat present within 200 feet of the disturbance area, including: culverts, snags, attics, warehouses, outbuildings, barns, siding or roofs of houses and other buildings, bridges, parking garages, woodpiles, trees, bat houses, caves, mines, talus, and cliff and rock crevices,</u> a qualified biologist paid for and hired by the applicant shall conduct preconstruction surveys for <u>evidence of bat roosts,</u> 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.</p> <p>a) Trees, snags, and buildings may be removed outside of the maternity roosting season without performing preconstruction bat surveys.</p>	<p>Less than significant with mitigation incorporated</p>	<p>Less than significant</p>

Table ES-1: Summary of Impacts and Mitigation Measures			
Impact	Mitigation Measures	Significance before Mitigation	Significance after Mitigation
	<p>b) Felled trees shall remain on the ground for 24 hours prior to being removed or chipped.</p> <p>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.</p> <p>d) If an <u>surveys</u> identified a <u>bat</u> maternity roost or <u>potential bat maternity roost that cannot be avoided</u> location is removed, <u>a bat maternity species and roost appropriate mitigation plan</u> shall be developed <u>prior to removal of roost habitat</u> in consultation with CDFW. The mitigation <u>plan</u> shall include at minimum <u>(i) the replacement of a suitable roost at a ratio of 2:1 (ii) success criteria based on roost occupancy; (iii) A five-year post-development monitoring program with the following elements contained in the Caltrans Bat Mitigation Guide 2019:</u></p> <ul style="list-style-type: none"> • <u>Quantification of the average number of bats present by species and season;</u> • <u>Comparison of replacement habitat within a structure if placement varies, or</u> 		

Table ES-1: Summary of Impacts and Mitigation Measures			
Impact	Mitigation Measures	Significance before Mitigation	Significance after Mitigation
	<p><u>if more than one habitat type, such as hanging boxes, is provided; and</u></p> <ul style="list-style-type: none"> <u>Long-term temperature monitoring from a subsample of replacement habitat features with temperature data loggers. Wireless data loggers can be used to limit the disturbance to roosting bats.</u> <p>structure within or immediately adjacent to the project site, such that similar structure shape and thermal properties are met with the replacement roost</p> <p>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).</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. The surveys shall occur when temperatures are above 60 degrees Fahrenheit (°F),</p>		

Table ES-1: Summary of Impacts and Mitigation Measures			
Impact	Mitigation Measures	Significance before Mitigation	Significance after Mitigation
	<p>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><u>Additionally, in areas where historical and current occurrence data indicate the presence of Crotch’s bumble bee, the following requirements shall apply:</u></p> <ul style="list-style-type: none"> • <u>A habitat assessment shall be conducted prior to subsequent project construction pursuant to guidance contain in Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species. The habitat assessment should be conducted by a qualified entomologist knowledgeable with the life history and ecological requirements of Crotch’s bumble bee. The habitat assessment should include all suitable nesting, overwintering, and foraging habitats within the project area and surrounding</u> 		

Table ES-1: Summary of Impacts and Mitigation Measures			
Impact	Mitigation Measures	Significance before Mitigation	Significance after Mitigation
	<p><u>areas. Potential nest habitat (February through October) could include that of other Bombus species such as bare ground, thatched grasses, abandoned rodent burrows or bird nests, brush piles, rock piles, and fallen logs. Overwintering habitat (November through January) could include that of other Bombus species such as soft and disturbed soil or under leaf litter or other debris. The habitat assessment should be conducted during peak bloom period for floral resources on which Crotch’s bumble bee feed.</u></p> <ul style="list-style-type: none"> • <u>If Crotch’s bumble bee habitat is present within the project area, the subsequent project shall include a pre-construction survey plan. The survey plan should be submitted to CDFW for review. Surveys should be conducted by a qualified entomologist familiar with the behavior and life history of Crotch’s bumble bee. If CESA candidate bumble bees will be captured or handled, surveyors should obtain a 2081(a) Memorandum of Understanding (MOU) from CDFW. Surveys shall be conducted during the colony active period (i.e. April through August) and when floral resources are in peak bloom. Bumble bees move nests sites each year, therefore, surveys should be conducted each year that project work activities will occur.</u> • <u>If Crotch’s bumble bee are detected during pre-construction surveys, a Crotch’s bumble bee avoidance plan shall be developed and provided to CDFW for review prior to work activities involving</u> 		

Table ES-1: Summary of Impacts and Mitigation Measures			
Impact	Mitigation Measures	Significance before Mitigation	Significance after Mitigation
	<p><u>ground disturbance or vegetation removal. If full take avoidance is not feasible, the subsequent project shall apply to CDFW for take authorization under an ITP.</u></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 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 		

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.

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>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.</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</p>		

Table ES-1: Summary of Impacts and Mitigation Measures			
Impact	Mitigation Measures	Significance before Mitigation	Significance after Mitigation
	<p>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 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>i) <u>If the FYLF cannot be avoided then a CESA ITP shall be obtained by the subsequent project prior to take occurring.</u></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>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. <u>Construction activities shall be avoided in all areas where a qualified biologist determines San Francisco garter snake is present.</u> 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-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 <u>MM-BIO-3</u> 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</p>		

Table ES-1: Summary of Impacts and Mitigation Measures			
Impact	Mitigation Measures	Significance before Mitigation	Significance after Mitigation
	<p>the applicant will conduct a preconstruction survey for Santa Cruz Kangaroo Rat and San Francisco dusky-footed woodrat nests <u>at least two weeks prior to within 30 days of the start of work any ground-disturbing activities. In the event a San Francisco dusky-footed woodrat midden or Santa Cruz kangaroo rat nest is found in the proposed development area, the developer/Project proponent shall submit results of surveys to CDFW. Surveys results shall include locations of any detected middens or nests, sighted individuals or carcasses on a base map or maps. Maps shall include aerial imagery of the work site, predicted disturbed areas and protective buffer distances. The map or maps shall use an appropriate scale to depict an individual midden and/or nest sites.</u></p> <p>If active nests are determined to be present in, or within 10 <u>50</u> feet of, the impact <u>project</u> area, the following measures will be implemented, as appropriate.</p> <ul style="list-style-type: none"> a) Active nests that are detected within the work areas will be avoided to the extent feasible. Ideally, a minimum 1<u>50</u>-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 1<u>50</u> feet of) the work areas is not feasible, then nest materials will be relocated to suitable habitat as close to the 		

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>project area as possible (ideally, within or immediately adjacent to the project site).</p> <p>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.</p>		

Project Description

The first list on page 2-18 is hereby amended as follows:

- San Francisco Bay Regional Water Quality Control Board
- [San Francisco Public Utilities Commission](#)
- [Woodside Fire Protection District](#)

Biological Resources

The third paragraph of page 3.3-18 is hereby amended as follows:

In addition, individual developments pursuant to the Proposed Project are required to complete a Project-Specific Analysis (PSA) checklist, located in Appendix H of the DEIR, to determine whether the development qualifies as within the scope of this DEIR or requires additional environmental documentation or its own independent environmental review. Such evaluations will ascertain whether the development project's effects on the environment were covered in the DEIR. 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.

The Mitigation Measure BIO-4 of page 3.3-20 is hereby amended as follows:

MM-BIO-4: Disturbance to Bat Species. ~~If required pursuant to pre-construction surveys~~ In areas where there is suitable habitat present within 200 feet of the disturbance area, including: culverts, snags, attics, warehouses, outbuildings, barns, siding or roofs of houses and other buildings, bridges, parking garages, woodpiles, trees, bat houses, caves, mines, talus, and cliff and rock crevices, a qualified biologist paid for and hired by the applicant shall conduct preconstruction surveys for evidence of bat roosts, ~~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~~ surveys identified ~~a bat~~ maternity roost or potential bat maternity roost that cannot be avoided ~~location is removed, a bat maternity~~ species and roost appropriate mitigation plan shall be developed prior to removal of roost habitat ~~in consultation with CDFW~~. The mitigation plan shall include at minimum (i) the replacement of a suitable roost at a ratio of 2:1 (ii) success criteria based on roost occupancy; (iii) A five-year post-development monitoring program with the following elements contained in the Caltrans Bat Mitigation Guide 2019:
- Quantification of the average number of bats present by species and season;
 - Comparison of replacement habitat within a structure if placement varies, or if more than one habitat type, such as hanging boxes, is provided; and
 - Long-term temperature monitoring from a subsample of replacement habitat features with temperature data loggers. Wireless data loggers can be used to limit the disturbance to roosting bats. ~~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).~~

The Mitigation Measure BIO-5 of page 3.3-21 is hereby amended as follows:

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.

Additionally, in areas where historical and current occurrence data indicate the presence of Crotch's bumble bee, the following requirements shall apply:

- A habitat assessment shall be conducted prior to subsequent project construction pursuant to guidance contain in Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species. The habitat assessment should be conducted by a qualified entomologist knowledgeable with the life history and ecological requirements of Crotch's bumble bee. The habitat assessment should include all suitable nesting, overwintering, and foraging habitats within the project area and surrounding areas. Potential nest habitat (February through October) could include that of other Bombus species such as bare ground, thatched grasses, abandoned rodent burrows or bird nests, brush piles, rock piles, and fallen logs. Overwintering habitat (November through January) could include that of other Bombus species such as soft and disturbed soil or under leaf litter or other debris. The habitat assessment should be conducted during peak bloom period for floral resources on which Crotch's bumble bee feed.
- If Crotch's bumble bee habitat is present within the project area, the subsequent project shall include a pre-construction survey plan. The survey plan should be submitted to CDFW for review. Surveys should be conducted by a qualified entomologist familiar with the behavior and life history of Crotch's bumble bee. If CESA candidate bumble bees will be captured or handled, surveyors should obtain a 2081(a) Memorandum of Understanding (MOU) from CDFW. Surveys shall be conducted during the colony active period (i.e. April through August) and when floral resources are in peak bloom. Bumble bees move nests sites each year, therefore, surveys should be conducted each year that project work activities will occur.
- If Crotch's bumble bee are detected during pre-construction surveys, a Crotch's bumble bee avoidance plan shall be developed and provided to CDFW for review prior to work activities involving ground disturbance or vegetation removal. If full take avoidance is not feasible, the subsequent project shall apply to CDFW for take authorization under an ITP.

The Mitigation Measure BIO-6 of page 3.3-22 is hereby amended as follows:

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,² 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

² 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.

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.
- 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.
- i) If the FYLF cannot be avoided then a CESA ITP shall be obtained by the subsequent project prior to take occurring.

The Mitigation Measure BIO-7 of page 3.3-23 is hereby amended as follows:

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. Construction activities shall be avoided in all areas where a qualified biologist determines San Francisco garter snake is present. 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.

The Mitigation Measure BIO-9 of page 3.3-24 is hereby amended as follows:

MM-BIO-10: 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~~ MM-BIO-3 above.

The Mitigation Measure BIO-10 of page 3.3-24 is hereby amended as follows:

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 at least two weeks prior to ~~within 30 days of~~ the start of work any ground-disturbing activities. In the event a San Francisco dusky-footed woodrat midden or Santa Cruz kangaroo rat nest is found in the proposed development area, the developer/Project proponent shall submit results of surveys to CDFW. Surveys results shall include locations of any detected middens or nests, sighted individuals or carcasses on a base map or maps. Maps shall include aerial imagery of the work site, predicted disturbed areas and protective buffer distances. The map or maps shall use an appropriate scale to depict an individual midden and/or nest sites.

If active nests are determined to be present in, or within ~~+0~~ 50 feet of, the ~~impact~~ project area, the following measures will be implemented, as appropriate.

- c) Active nests that are detected within the work areas will be avoided to the extent feasible. Ideally, a minimum +50-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.
- d) If avoidance of active nests within and immediately adjacent to (within +50 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).

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.

Geology and Soils

In Chapter 3.4: Geology and Soils, pages 3.6-1 through 3.6-21 are hereby renumbered 3.4-1 through 3.4-21 to correct a clerical error in the DEIR.

Transportation

The second and third paragraphs of page 3.7-5 are hereby added as follows:

[Caltrans District 4 Bike Plan for the San Francisco Bay Area \(2018\)](#)

[The Caltrans District 4 Bike Plan \(Plan\) identifies infrastructure improvements that can enhance bicycle safety and mobility throughout District 4 and remove some of the barriers to bicycling in the region. The Plan was developed in cooperation with local and regional partners to ensure that the improvements on the State highway system complement proposals for local networks.](#)

[District 4 Pedestrian Plan for the Bay Area \(2021\)](#)

[This Plan implements the Vision Statement and Goals in Toward an Active California, the statewide bicycle and pedestrian plan, and is part of a comprehensive planning process to identify locations with bicycle and pedestrian needs in each Caltrans district across California. Needs identified in this Plan will inform future investments on the SHS by Caltrans and local partners.](#)

The fourth paragraph of page 3.7-5 is hereby added as follows:

[California Transportation Plan \(CTP\) 2050](#)

[CTP 2050 envisions that the majority of new housing located near existing housing, jobs, and transit, and in close proximity to one another will reduce vehicle travel and GHG emissions, and be accessible and affordable for all Californians, including disadvantaged and low-income communities. The location, density, and affordability of future housing will dictate much of our future travel patterns, and our ability to achieve the vision outlined in CTP 2050.](#)

Utilities and Service Systems

The third paragraph of page 3.9-16 is hereby amended as follows:

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~~ Proposed developments at these locations would be required to install new sewer lines within the street network to serve project needs. Final sizing of particular lines will be subject to modeling of the system that must rely on demand 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 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. The Proposed Project anticipates 16 units on 773 Cañada Road and 17 units on Raymundo Drive for a total of 33 units.

Volume 2: Appendices

The following Appendix H is hereby added to the EIR as follows:

Appendix H

Project-Specific Analysis

PD-3: PROJECT-SPECIFIC ANALYSIS

PD-3.1: INTRODUCTION

The Draft Environmental Impact Report (DEIR) 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 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, as defined by the California Environmental Quality Act, Public Resources Code Section 21000, *et seq.* (CEQA).

Using the Project-specific Analysis (PSA) in reliance on the DEIR, the lead agency or other project proponents will evaluate each development pursuant to the Proposed Project to determine whether the development qualifies as within the scope of this DEIR or requires additional environmental documentation or its own independent environmental review. Such evaluations will ascertain whether the development project’s effects on the environment were covered in the DEIR. Also, the project proponent will evaluate whether the development project would (1) cause any new impact, (2) cause any substantially more severe significant impact than was addressed in the DEIR, or (3) reveal a mitigation measure or alternative that is substantially different from those in the DEIR or found infeasible in the DEIR, but that is now is feasible, and that the project proponent declines to implement. If none of those outcomes are determined, and the effects on the environment were covered in the DEIR, the impacts of the later development project can be found to be within the scope of this DEIR, and no additional environmental documentation would be required (State CEQA Guidelines Section 15168[c][1], [2] and [4]). The determination that a project is within the scope of the DEIR is a factual determination that should be supported by substantial evidence. The substantial evidence underpinning the finding is developed using the PSA checklist provided in this section. If a project is within the scope of this DEIR, the project proponent may act on the project using the PSA and DEIR without public circulation of any additional environmental document. If the project is approved, the project proponent would file a Notice of Determination.

Under this CEQA compliance approach, a project proponent must incorporate from the DEIR into the later development project all feasible mitigation measures in response to significant impacts caused by the later project. A “within the scope” finding for later development projects would facilitate an increase in the pace and scale of project approvals in a manner that includes environmental protections.

If a later development project would have impacts that were not covered by the DEIR (and therefore would not qualify for a within the scope finding), then additional documentation may need to be prepared that accompanies the DEIR to demonstrate the project’s CEQA compliance (State CEQA Guidelines Section 15168(c)(1)). If additional documentation is needed, it may be a Negative Declaration, Mitigated Negative Declaration, or an EIR, depending on the environmental impact differences encountered. In this situation, the PSA serves the same function as an initial study to identify which impacts were not covered by (and are therefore not within the scope of) the DEIR and, therefore, must be addressed in a Negative Declaration, Mitigated Negative Declaration, or an EIR, as well as documenting those impacts that are within the scope of the DEIR. Refer to Section PD-3.2.3 (under Checklist Answers) for additional explanation regarding the function of the PSA checklist.

PD-3.2: EVALUATION OF ENVIRONMENTAL IMPACTS

The PSA provided herein is to be used to determine whether later development projects have been covered in the DEIR to allow for approval without further environmental review and documentation (beyond what is needed to complete the PSA), or whether additional CEQA documentation is required (i.e., a Negative Declaration, Mitigated Negative Declaration or EIR). Environmental effects are not necessarily limited to those identified in the PSA checklist,

which encompasses all effects disclosed in the DEIR. For this reason, the checklist includes a row for “Other Impacts” under each resource area.

The determination as to whether an ND, MND, or EIR is required for impacts that are not within the scope of the DEIR is subject to the “fair argument” standard, which requires preparation of an EIR when there is a fair argument, based on substantial evidence in the record, that the proposed project may have a significant effect on the environment.

PD-3.2.1: Documenting Whether Impacts of a Proposed Projects are Within the Scope of the DEIR

For the PSA to adequately document the impacts that are within the scope of this DEIR and do not require additional CEQA review and documentation, the PSA must identify the following:

- ▶ **Relevant DEIR analysis.** Identify the specific sections, impact numbers, and page numbers from this DEIR that contain information relevant to the proposed project.
- ▶ **Additional Studies Prepared and References Cited.** Attach to the PSA site-specific studies, reports, and survey results used in support of the within-the-scope finding or impact significance determination, if less severe than that identified in the DEIR. Include copies of references cited in the PSA, which will be made available to the public by the project proponent upon request.
- ▶ **Environmental Impacts.** Identify which impacts in the DEIR would occur from implementation of the proposed development project. Because the intent of the DEIR is to disclose potentially significant impacts that are reasonably foreseeable to occur from any of the developments within the Planning Area, it is expected that, due to site-specific conditions, proposed development projects may result in impacts less severe than those identified in the DEIR. A project proponent may rely on the impact significance determination in the DEIR, and for significant impacts, apply the relevant mitigation measures. Alternatively, if an impact identified as significant in the DEIR would be less than significant for the later development project, the project proponent may demonstrate with substantial evidence in the PSA that the project impact is less than significant and mitigation measure(s) are not needed. Similarly, potentially significant environmental effects identified in the DEIR may be minimized or found to be less than significant without mitigation in the future due to technological advances, further research, or industry response (e.g., air quality, greenhouse gas emissions, utilities and service systems); these effects and the reasons they are less severe than those identified in the DEIR will be documented in the PSA.
- ▶ **Mitigation Measures.** Identify each mitigation measure from the DEIR that is relevant to the proposed project. In the PSA, explain any components of the mitigation measures that are not applicable to the project, and for any significance determination that is different than the DEIR, describe how each measure will address site-specific conditions and reduce the impact of the proposed development project.

PD-3.2.2: Providing Substantial Evidence

The impact determinations and within-the-scope findings in the PSA, as well as any explanation for planned deviations, identified parameters, or feasibility determinations associated with mitigation measures, must be based on substantial evidence (defined in the CEQA Guidelines as “facts, reasonable assumptions predicted upon facts, and expert opinion supported by facts”). Therefore, the PSA will include analytical discussions of the conclusions reached. Portions of the DEIR relied on for conclusions should be identified by section number and page number. Ancillary information (e.g., site-specific surveys) not included in the DEIR but relied on for conclusions or required by DEIR measures will be attached to the PSA. A list of references cited in the PSA will be included with the PSA and copies of such references made available to the public by the proponent agency upon request.

PD-3.2.3: Project-Specific Analysis

MITIGATION MEASURES AND MONITORING AND REPORTING

The analysis must consider the measures identified in the DEIR that will avoid, reduce, or otherwise mitigate potential impacts of the project. These measures take the form of mitigation measures. Some mitigation measures apply to all projects, while others only apply to projects that include specific development types or locations. Attachment A to this checklist provides a comprehensive list of mitigation measures applicable to each project type. The project proponent should complete Attachment A and verify that all applicable mitigation measures will be implemented, the timing of implementation, and identify the entity responsible for implementing and verifying or enforcing each measure. In effect, a completed Attachment A to the PSA will function as the Mitigation Monitoring and Reporting Program for the development project.

RESOURCE AREAS

The environmental resource areas in the PSA checklist are the same as those analyzed in Chapter 3 of the DEIR. The project proponent will review the environmental analysis in the DEIR for each corresponding resource area in the PSA checklist. The project proponent will consider whether required mitigation measures would be effective in avoiding, reducing, or mitigating environmental impacts of the project considering the proposed activities and site-specific characteristics. Written explanations supporting all conclusions should be provided in the discussion following the checklist questions for each resource area.

CHECKLIST ANSWERS

The primary functions of the checklist are to determine:

- ▶ whether any of the significant impacts of the later development project would be substantially more severe than those covered in the DEIR;
- ▶ whether the later development project would result in any new impacts that were not covered in the DEIR; and
- ▶ the type of CEQA document, if any, that is appropriate to examine impacts that are not within the scope of the DEIR.

Accordingly, the checklist questions presented for each resource area identify, for each impact addressed in the DEIR, whether the impact applies to the project and if so, identify the mitigation measures that are applicable to the development project. The checklist is also intended to identify whether the impact significance determination for the development project is different than the impact significance determination in the DEIR; if it is different, the checklist will identify whether the difference constitutes a substantially more severe significant impact and is therefore not within the scope of the DEIR. If it is determined that a substantially more severe significant impact that cannot be mitigated down to the same level as, or lower level than, identified in the DEIR would result from a later development project, an EIR must be prepared, unless one or more mitigation measures incorporated into the project would mitigate the effects to a point where clearly no significant effect on the environment would occur, in which case an MND would be appropriate. The MND or EIR may be limited to examining the impacts that are not within the scope of the DEIR.

“New” impacts are effects on the environment that were not addressed in the DEIR.

For each new impact listed in the checklist, the project proponent should indicate whether the impact would be one of the following:

- ▶ **New Impact that is Less Than Significant:** The project would result in a new adverse impact that is not analyzed in the DEIR; however, the impact would not be significant. In this case, the impact is not “within

the scope” of the DEIR and preparation of a Negative Declaration could be prepared. Pursuant to CEQA Guidelines Section 15168(d), a subsequent negative declaration could be prepared to document the new impact and substantial evidence supporting the less-than-significant conclusion, along with the PSA checklist documenting the rest of the “within-the-scope” impacts.

- ▶ **New Impact that is Less Than Significant with Mitigation Incorporated:** The project would result in a new significant impact that is not analyzed in the DEIR, but due to the project proponent’s willingness to incorporate new mitigation into the proposed project, the impact is clearly less than significant with feasible mitigation. In this case, the impact is not “within the scope” of the DEIR and a Mitigated Negative Declaration could be prepared, consistent with CEQA Guidelines Section 15168(d), which allows for use of a subsequent negative declaration to document the new impact and substantial evidence supporting the less-than-significant conclusion, along with the PSA checklist documenting the rest of the “within-the-scope” impacts.
- ▶ **New Impact that is Potentially Significant:** The project would result in a new significant impact that is not analyzed in the DEIR (which would be subject to the “fair argument” standard as a new impact), the impact cannot be clearly mitigated to less than significant. In this circumstance, the impact is not “within the scope” of the DEIR and preparation of an Environmental Impact Report (EIR) is required. The EIR will cover the new potentially significant or significant impact(s) and need not further evaluate significant impacts already covered in the DEIR, which are documented in the PSA.

In summary, when additional environmental documentation is needed to augment the DEIR for CEQA compliance, the PSA checklist and accompanying analysis would serve the same function as an initial study that defines the topics to be addressed in the EIR, MND, or ND to cover the impacts that are not within the scope of the DEIR, as directed by State CEQA Guidelines Section 15168(d)(1). Pursuant to State CEQA Guidelines Section 15168(d), a later ND could be prepared, if the new impact would be less than significant, or MND, if the new impact or substantially more severe significant impact could be clearly mitigated to less than significant. The analysis of any new impact to support adoption of an ND or MND, along with the analysis of impacts that are within the scope, would be documented in the PSA checklist. If a later EIR is prepared, it could be limited in its scope to the new significant impact(s) or substantially more severe significant impact(s), with the remainder of the impacts that are within the scope of the DEIR being documented in the PSA checklist.

ENVIRONMENTAL CHECKLIST

PROJECT INFORMATION

1. **Project Title:**
2. **Project Proponent Name and Address:**
3. **Contact Person Information and Phone Number:** *[provide phone number and email]*
4. **Project Location:** *[include county and coordinates; also include cross streets or other major landmark as useful to identify site location]*
5. **Description of Project:** (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary.)
[insert text here]
6. **Regional Setting and Surrounding Land Uses:** (Briefly describe the project's surroundings)
[insert text here]
7. **Other Public Agencies Whose Approval is Required:** (e.g., permits)
[insert text here; note status of any required approvals (permits)]
9. **Native American Consultation.** *For development projects that are within the scope of the DEIR, AB 52 consultation for AB 52 compliance has been completed. The lead agency conducted consultation pursuant to Public Resources Code section 21080.3.1 during preparation of the DEIR. For development projects with impacts not within the scope of the DEIR, pursuant to PRC Sections 21080.3.1, 21080.3.2, and 21082.3, project proponents preparing a new negative declaration, mitigated negative declaration, or EIR must notify any California Native American tribe who has submitted written request for notification of a project in the area of the development site. Upon written request for consultation by a tribe, the project proponent must begin consultation before the release of the environmental document and must follow the requirements of the cited PRC sections.*
[insert text here]

DETERMINATION (To be completed by the project proponent)

On the basis of this PSA and the substantial evidence supporting it:

- I find that all of the effects of the proposed project (a) have been covered in the DEIR, and (b) all applicable mitigation measures identified in the DEIR will be implemented. The proposed project is, therefore, **WITHIN THE SCOPE** of the DEIR. **NO ADDITIONAL CEQA DOCUMENTATION** is required.
- I find that the proposed project will have effects that were not covered in the DEIR. These effects are less than significant without any mitigation beyond what is already required pursuant to the DEIR. A **NEGATIVE DECLARATION** will be prepared.
- I find that the proposed project will have effects that were not covered in the DEIR or will have effects that are substantially more severe than those covered in the DEIR. Although these effects may be significant in the absence of additional mitigation beyond the DEIR’s measures, revisions to the proposed project or additional mitigation measures have been agreed to by the project proponent that would avoid or reduce the effects so that clearly no significant effects would occur. A **MITIGATED NEGATIVE DECLARATION** will be prepared.
- I find that the proposed project will have significant environmental effects that are (a) new and were not covered in the DEIR and/or (b) substantially more severe than those covered in the DEIR. Because one or more effects may be significant and cannot be clearly mitigated to less than significant, an **ENVIRONMENTAL IMPACT REPORT** will be prepared.

Signature

Date

Printed Name

Title

Agency

EVALUATION OF ENVIRONMENTAL IMPACTS

1. Refer to the applicable resource analysis section in the DEIR for relevant information on each environmental topic.
2. A brief explanation is required for each impact, including impacts that have been identified in the DEIR as well as any "new impacts".
3. The discussion of each impact identified in the DEIR that is also applicable to the proposed development project should generally include the following information:
 - ▶ Briefly describe the impact of the proposed development project.
 - ▶ Summarize the impact as it was presented in the DEIR, including a statement that the impact is covered in DEIR.
 - ▶ Provide evidence that (explain why) the project impact is covered in DEIR, considering whether the proposed development is consistent with the activities addressed in the DEIR as well as the associated intensity.
 - ▶ Identify MMs applicable to the development project.
 - ▶ (If applicable) Explain which components of the MM would be applied. This circumstance exists if the MM allows for deviation from requirements, identification of parameters, and determinations of feasibility. A site- and/or activity-specific explanation for the planned deviation, identified parameter, or feasibility determination must be provided in the PSA.
 - ▶ (If applicable) Explain why the impact significance in the PSA is different than that found in the DEIR; substantiate the different (new) significance conclusion.
 - ▶ (If applicable) Explain why MM identified for this impact in DEIR do not apply to this project. This circumstance may exist where a PSA impact was identified in the DEIR, but the impact severity would be less for the development project or the MM does not otherwise apply.
4. If the project proponent has determined that a new impact would occur, then the checklist answers for the new impact must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant without the need for mitigation.
5. "Potentially Significant" is appropriate if there is substantial evidence that a new impact may be significant. If there are one or more "Potentially Significant" new impacts identified, or if any impact would constitute a substantially more severe significant impact than was covered in the DEIR, an EIR is required unless one or more mitigation measures incorporated into the project would mitigate the effects to a point where clearly no significant effect on the environment would occur, in which case an MND would be appropriate. AND could be prepared, if the new impact would be less than significant, or MND, if the new impact could be clearly mitigated to less than significant. The analysis of any new impact to support adoption of an ND or MND, along with the analysis of impacts that are within the scope, would be documented in the PSA checklist. If a later EIR is prepared, it could be limited in its scope to the new significant impact(s) or substantially more severe significant impact(s), with the remainder of the impacts that are within the scope of the DEIR being documented in the PSA checklist and attached to the EIR as an appendix. When preparing any environmental document, the environmental analysis should incorporate by reference pertinent portions of the analysis from the DEIR and focus the environmental analysis solely on issues that were not addressed in the DEIR.
6. Project proponents should incorporate into the PSA checklist references to information sources for potential impacts. Include a list of references cited in the PSA and make copies of such references available to the public upon request.

PD-3.3: AESTHETICS

Impact in the DEIR			Project-Specific Checklist				
Environmental Impact Covered In the DEIR	Identify Impact Significance in the DEIR	Identify Location of Impact Analysis in the DEIR	Does the Impact Apply to the Project?	List MMs Applicable to the Project ¹	Identify Impact Significance for Project	Would this be a Substantially More Severe Significant Impact than Identified in the DEIR?	Is this Impact Within the Scope of the DEIR?
Would the project:							
3.1-1 Have a substantial adverse effect on scenic vistas.	LTS	Impact 3.1-1 pp. 3.1-11					
3.1-2 Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.	LTS	Impact 3.1-2 pp. 3.1-13					
3.1-3 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.	LTS	Impact 3.1-3 pp. 3.1-14					
3.1-4 Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.	LTS	Impact 3.1-4 pp. 3.1-15					

¹NA: not applicable; there are no MMs identified in the DEIR for this impact. None: there are MMs identified in the DEIR for this impact, but none are applicable to the project.

New Aesthetic and Visual Resource Impacts: Would the project result in other impacts to aesthetics and visual resources that are not evaluated in the DEIR?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	If yes, complete row(s) below and discussion		
			Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

Impact 3.1-1

Impact 3.1-2

Impact 3.1-3

Impact 3.1-4

New Aesthetic and Visual Resource Impacts

PD-3.4: AIR QUALITY

Impact in the DEIR			Project-Specific Checklist				
Environmental Impact Covered In the DEIR	Identify Impact Significance in the DEIR	Identify Location of Impact Analysis in the DEIR	Does the Impact Apply to the Project?	List MMs Applicable to the Project ¹	Identify Impact Significance for Project	Would this be a Substantially More Severe Significant Impact than Identified in the DEIR?	Is this Impact Within the Scope of the DEIR?
Would the project:							
3.2-1 Conflict with or obstruct the implementation of the applicable air quality plan.	LTS	Impact 3.2-1 pp. 3.2-25					
3.2-2 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.	LTSM	Impact 3.2-2 pp. 3.2-29					
3.2-3 Expose sensitive receptors to substantial pollutant concentrations.	LTSM	Impact 3.2-3 pp. 3.2-34					
3.2-4 Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.	LTS	Impact 3.2-4 pp. 3.2-36					

¹NA: not applicable; there are no MMs identified in the DEIR for this impact. None: there are MMs identified in the DEIR for this impact, but none are applicable to the project.

New Air Quality Impacts: Would the project result in other impacts to air quality that are not evaluated in the DEIR?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	If yes, complete row(s) below and discussion	
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant	
[identify new impact here, if applicable; add rows as needed]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Discussion

Impact 3.2-1

Impact 3.2-2

Impact 3.2-3

Impact 3.2-4

New Air Quality Resource Impacts

PD-3.5: BIOLOGICAL RESOURCES

Impact in the DEIR			Project-Specific Checklist				
Environmental Impact Covered In the DEIR	Identify Impact Significance in the DEIR	Identify Location of Impact Analysis in the DEIR	Does the Impact Apply to the Project?	List MMs Applicable to the Project ¹	Identify Impact Significance for Project	Would this be a Substantially More Severe Significant Impact than Identified in the DEIR?	Is this Impact Within the Scope of the DEIR?
Would the project:							
3.3-1 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.	LTSM	Impact 3.3-1 pp. 3.3-16					
3.3-2 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 Game or U.S. Fish and Wildlife Service.	LTS	Impact 3.3-2 pp. 3.3-25					
3.3-3 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.	LTS	Impact 3.3-3 pp. 3.3-26					
3.3-4 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.	LTS	Impact 3.3-4 pp. 3.3-27					

¹NA: not applicable; there are no MMs identified in the DEIR for this impact. None: there are MMs identified in the DEIR for this impact, but none are applicable to the project.

New Biological Resources Impacts: Would the project result in other impacts to biological resources that are not evaluated in the DEIR??	<input type="checkbox"/> Yes	<input type="checkbox"/> No	If yes, complete row(s) below and discussion	
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant	
[identify new impact here, if applicable; add rows as needed]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Discussion

Impact 3.3-1

Impact 3.3-2

Impact 3.3-3

Impact 3.3-4

New Biological Resources Impacts

PD-3.6: GEOLOGY AND SOILS

Impact in the DEIR			Project-Specific Checklist				
Environmental Impact Covered In the DEIR	Identify Impact Significance in the DEIR	Identify Location of Impact Analysis in the DEIR	Does the Impact Apply to the Project?	List MMs Applicable to the Project ¹	Identify Impact Significance for Project	Would this be a Substantially More Severe Significant Impact than Identified in the DEIR?	Is this Impact Within the Scope of the DEIR?
Would the project:							
3.4-1 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.	LTS	Impact 3.4-1 pp 3.4-18					
3.4-2 Result in substantial soil erosion or the loss of topsoil.	LTS	Impact 3.4-2 pp. 3.4-20					

¹NA: not applicable; there are no MMs identified in the DEIR for this impact. None: there are MMs identified in the DEIR for this impact, but none are applicable to the project.

New Geology and Soils Impacts: Would the project result in other impacts to geology and soils that are not evaluated in the DEIR?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	If yes, complete row(s) below and discussion			
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant			
[identify new impact here, if applicable; add rows as needed]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			

Discussion

Impact 3.4-1

Impact 3.4-2

New Geology and Soils Impacts

PD-3.7: GREENHOUSE GAS EMISSIONS

Impact in the DEIR			Project-Specific Checklist				
Environmental Impact Covered In the DEIR	Identify Impact Significance in the DEIR	Identify Location of Impact Analysis in the DEIR	Does the Impact Apply to the Project?	List MMs Applicable to the Project ¹	Identify Impact Significance for Project	Would this be a Substantially More Severe Significant Impact than Identified in the DEIR?	Is this Impact Within the Scope of the DEIR?
Would the project:							
3.5-1 Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	Construction: LTSM Operations: SU	Impact 3.5-1 pp 3.5-18					
3.5-2 Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	Construction: LTSM Operations: SU	Impact 3.5-2 pp 3.5-22					

¹NA: not applicable; there are no MMs identified in the DEIR for this impact. None: there are MMs identified in the DEIR for this impact, but none are applicable to the project.

New GHG Emissions Impacts: Would the project result in other impacts to GHG emissions that are not evaluated in the DEIR?	<input type="checkbox"/> Yes		<input type="checkbox"/> No		If yes, complete row(s) below and discussion	
				Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Discussion

Impact 3.5-1

Impact 3.5-2

New Impacts Related to GHG Emissions

PD-3.8: NOISE

Impact in the DEIR			Project-Specific Checklist				
Environmental Impact Covered In the DEIR	Identify Impact Significance in the DEIR	Identify Location of Impact Analysis in the DEIR	Does the Impact Apply to the Project?	List MMs Applicable to the Project ¹	Identify Impact Significance for Project	Would this be a Substantially More Severe Significant Impact than Identified in the DEIR?	Is this Impact Within the Scope of the DEIR?
Would the project:							
3.6-1 Generate substantial temporary or permanent increases 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.	LTSM	Impact 3.6-1 pp 3.6-15					
3.6-2 Generate excessive groundborne vibration or groundborne noise levels.	LTS	Impact 3.6-2 pp 3.6-20					
3.6-3 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.	NI	Impact 3.6-3 pp 3.6-21					

¹NA: not applicable; there are no MMs identified in the DEIR for this impact. None: there are MMs identified in the DEIR for this impact, but none are applicable to the project.

New Noise Impacts: Would the project result in other noise-related impacts that are not evaluated in the DEIR?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	If yes, complete row(s) below and discussion	
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant	
[identify new impact here, if applicable; add rows as needed]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Discussion

Impact 3.6-1

Impact 3.6-2

Impact 3.6-3

New Noise Impacts

PD-3.9: TRANSPORTATION

Impact in the DEIR			Project-Specific Checklist				
Environmental Impact Covered In the DEIR	Identify Impact Significance in the DEIR	Identify Location of Impact Analysis in the DEIR	Does the Impact Apply to the Project?	List MMs Applicable to the Project ¹	Identify Impact Significance for Project	Would this be a Substantially More Severe Significant Impact than Identified in the DEIR?	Is this Impact Within the Scope of the DEIR?
Would the project:							
3.7-1 Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, and bicycle and pedestrian facilities.	LTS	Impact 3.7-1 pp 3.7-8					
3.7-2 Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).	SU	Impact 3.7-2 pp 3.7-10					

¹NA: not applicable; there are no MMs identified in the DEIR for this impact. None: there are MMs identified in the DEIR for this impact, but none are applicable to the project.

New Transportation Impacts: Would the project result in other impacts to transportation that are not evaluated in the DEIR?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	If yes, complete row(s) below and discussion		
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant		
[identify new impact here, if applicable; add rows as needed]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		

Discussion

Impact 3.7-1

Impact 3.7-2

New Transportation Impacts

PD-3.10: TRIBAL CULTURAL RESOURCES

Impact in the DEIR			Project-Specific Checklist				
Environmental Impact Covered In the DEIR	Identify Impact Significance in the DEIR	Identify Location of Impact Analysis in the DEIR	Does the Impact Apply to the Project?	List MMs Applicable to the Project ¹	Identify Impact Significance for Project	Would this be a Substantially More Severe Significant Impact than Identified in the DEIR?	Is this Impact Within the Scope of the DEIR?
Would the project:							
<p>3.8-1 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:</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>	LTSM	Impact 3.8-1 pp. 3.8-9					

¹NA: not applicable; there are no MMs identified in the DEIR for this impact. None: there are MMs identified in the DEIR for this impact, but none are applicable to the project.

Tribal Cultural Resources Impacts: Would the project result in other impacts to tribal cultural resources that are not evaluated in the DEIR?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	If yes, complete row(s) below and discussion	
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant	
[identify new impact here, if applicable; add rows as needed]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Discussion

Impact 3.8-1

Tribal Cultural Resource Impacts

PD-3.11: UTILITIES AND SERVICE SYSTEMS

Impact in the DEIR			Project-Specific Checklist				
Environmental Impact Covered In the DEIR	Identify Impact Significance in the DEIR	Identify Location of Impact Analysis in the DEIR	Does the Impact Apply to the Project?	List MMs Applicable to the Project ¹	Identify Impact Significance for Project	Would this be a Substantially More Severe Significant Impact than Identified in the DEIR?	Is this Impact Within the Scope of the DEIR?
Would the project:							
3.9-1 Require or result in the relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.	LTS	Impact 3.9-1 pp 3.9-14					

¹NA: not applicable; there are no MMs identified in the DEIR for this impact. None: there are MMs identified in the DEIR for this impact, but none are applicable to the project.

New Utilities and Service System Impacts: Would the project result in other impacts to utilities and service systems that are not evaluated in the DEIR?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	If yes, complete row(s) below and discussion		
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant		
[identify new impact here, if applicable; add rows as needed]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		

Discussion

Impact 3.9-1

New Impacts to Utilities and Service Systems

PD-3.12: WILDFIRE

Impact in the DEIR			Project-Specific Checklist				
Environmental Impact Covered In the DEIR	Identify Impact Significance in the DEIR	Identify Location of Impact Analysis in the DEIR	Does the Impact Apply to the Project?	List MMs Applicable to the Project ¹	Identify Impact Significance for Project	Would this be a Substantially More Severe Significant Impact than Identified in the DEIR?	Is this Impact Within the Scope of the DEIR?
Would the project:							
3.10-1 Substantially impair an adopted emergency response plan or emergency evacuation plan.	LTS	Impact 3.10-1 pp 3.10-16					
3.10-2 Exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.	LTS	Impact 3.10-2 pp 3.10-19					
3.10-3 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.	LTS	Impact 3.10-3 pp 3.10-20					
3.10-4 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.	LTS	Impact 3.10-4 pp 3.10-21					

¹NA: not applicable; there are no MMs identified in the DEIR for this impact. None: there are MMs identified in the DEIR for this impact, but none are applicable to the project.

New Wildfire Impacts: Would the project result in other impacts related to wildfire that are not evaluated in the DEIR?	<input type="checkbox"/> Yes		<input type="checkbox"/> No		If yes, complete row(s) below and discussion	
			Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant	
[identify new impact here, if applicable; add rows as needed]			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Discussion

Impact 3.10-1

Impact 3.10-2

Impact 3.10-3

Impact 3.10-4

New Impacts to Wildfire

ATTACHMENT A -MITIGATION MEASURES CHECKLIST

Instructions: Review the mitigation measures and verify that those that are applicable will be implemented. Provide information for each column as follows:

- ▶ **Applicable (Yes/No).** Document whether the mitigation measure is applicable to the development project (Yes or No). The applicability should be substantiated in the Environmental Checklist Discussion.
- ▶ **Timing.** This column identifies the time frame in which the mitigation measure will be implemented (e.g., prior to construction, during construction, etc.).
- ▶ **Implementing Entity.** The implementing entity is the agency or organization responsible for carrying out the requirement. This could include the project proponent's project manager, a technical specialist (e.g., archeologist or biologist), a partner agency or organization, or other entities that are primarily responsible for carrying out each project requirement.
- ▶ **Verifying/Monitoring Entity.** The verifying/monitoring entity is the agency or organization responsible for ensuring that the requirement is implemented. The verifying/monitoring entity may be different from the implementing entity.

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Air Quality				
<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 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. 				
<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</p>				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>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:</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); 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 				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>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).</p>				
Biological Resources				
<p>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.</p>				
<p>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.</p>				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<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> <ol 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: <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, 				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>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.</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. In areas where there is suitable habitat present within 200 feet of the disturbance area, including: culverts, snags, attics, warehouses, outbuildings, barns, siding or roofs of houses and other buildings, bridges, parking garages, woodpiles, trees, bat houses, caves, mines, talus, and cliff and rock crevices, a qualified biologist paid for and hired by the applicant shall conduct preconstruction surveys for evidence of bat roosts. 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.</p> <ol 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. 				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>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.</p> <p>e) If surveys identify a bat maternity roost or potential bat maternity roost that cannot be avoided, a bat maternity roost mitigation plan shall be developed prior to removal of roost habitat. The mitigation plan shall include at minimum (i) the replacement of roost at a ratio of 2:1 (ii) success criteria based on roost occupancy; (iii) A five-year post-development monitoring program with the following elements contained in the Caltrans Bat Mitigation Guide 2019:</p> <ul style="list-style-type: none"> • Quantification of the average number of bats present by species and season; • Comparison of replacement habitat within a structure if placement varies, or if more than one habitat type, such as hanging boxes, is provided; and • Long-term temperature monitoring from a subsample of replacement habitat features with temperature data loggers. Wireless data loggers can be used to limit the disturbance to roosting bats. <p>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.</p>				
<p>MM BIO-5: Disturbance to Obscure Bumble Bee. 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 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</p>				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>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. Additionally, in areas where historical and current occurrence data indicate the presence of Crotch’s bumble bee, the following requirements shall apply:</p> <ul style="list-style-type: none"> • A habitat assessment shall be conducted prior to subsequent project construction pursuant to guidance contain in Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species. The habitat assessment should be conducted by a qualified entomologist knowledgeable with the life history and ecological requirements of Crotch’s bumble bee. The habitat assessment should include all suitable nesting, overwintering, and foraging habitats within the project area and surrounding areas. Potential nest habitat (February through October) could include that of other Bombus species such as bare ground, thatched grasses, abandoned rodent burrows or bird nests, brush piles, rock piles, and fallen logs. Overwintering habitat (November through January) could include that of other Bombus species such as soft and disturbed soil or under leaf litter or other debris. The habitat assessment should be conducted during peak bloom period for floral resources on which Crotch’s bumble bee feed. • If Crotch’s bumble bee habitat is present within the project area, the subsequent project shall include a pre-construction survey plan. The survey plan should be submitted to CDFW for review. Surveys should be conducted by a qualified entomologist familiar with the behavior and life history of Crotch’s bumble bee. If CESA candidate bumble bees will be captured or handled, surveyors should obtain a 2081(a) Memorandum of Understanding (MOU) from CDFW. Surveys shall be conducted during the colony active period (i.e. April through August) and when floral resources are in peak bloom. Bumble bees move nests sites each year, therefore, surveys should be conducted each year that project work activities will occur. • If Crotch’s bumble bee are detected during pre-construction surveys, a Crotch’s bumble bee avoidance plan shall be developed and provided to CDFW for review prior to work activities involving ground disturbance or vegetation removal. If full take avoidance is not feasible, the subsequent project shall apply to CDFW for take authorization under an ITP. 				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>MM BIO-6: Disturbance to Foothill Yellow-Legged Frog (FYLF) and California Red-Legged Frog (CRLF).</p> <p>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, 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 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. 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. 				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<ul style="list-style-type: none"> 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. i) If the FYLF cannot be avoided then a CESA ITP shall be obtained by the subsequent project prior to take occurring. 				
<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. Construction activities shall be avoided in all areas where a qualified biologist determines San Francisco garter snake is present. 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 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</p>				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>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-3 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 at least two weeks prior to the start of any ground-disturbing activities. In the event a San Francisco dusky-footed woodrat midden or Santa Cruz kangaroo rat nest is found in the proposed development area, the developer/Project proponent shall submit results of surveys to CDFW. Surveys results shall include locations of any detected middens or nests, sighted individuals or carcasses on a base map or maps. Maps shall include aerial imagery of the work site, predicted disturbed areas and protective buffer distances. The map or maps shall use an appropriate scale to depict an individual midden and/or nest sites. If active nests are determined to be present in, or within 50 feet of, the project area, the following measures will be implemented, as appropriate.</p> <ul style="list-style-type: none"> a) Active nests that are detected within the work areas will be avoided to the extent feasible. Ideally, a minimum 50-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 50 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>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</p>				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>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.</p>				
Greenhouse Gas Emissions				
<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>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>				
Noise				
<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>				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<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 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. 				

Transportation

<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 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 				
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Tribal Cultural Resources

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<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 resources likely to be uncovered during excavation, laws that protect cultural resources, and the unanticipated discovery protocol per the PRC Section 21083.</p>				

