Laurel Way
Planned Development Project
Revised Final Environmental Impact Report

February 2013

Prepared for:
City of Redwood City
1017 Middlefield Road
Redwood City, California 94063

Prepared by:
Panorama Environmental, Inc.
One Embarcadero Center, Suite 740
San Francisco, California 94111
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1: INTRODUCTION

1.1 Overview of the Revised Final EIR

The City of Redwood City received an application for the Laurel Way Development Project in July 2007. The proposed project included:

- A 5.1-acre residential development involving 20 existing parcels
- Construction of a private roadway connecting to existing private streets
- Extension of City utilities to the residential lots
- Construction, installation, and maintenance of retaining walls and parking areas along the new private roadway (extension of Laurel Way)
- Merger of three lots and subdivision into two lots, one of which would be an open space lot serving the hillside development
- 18 new residences

A Draft and Final Environmental Impact Report (EIR) were prepared for this July 2007 application. The applicant subsequently withdrew the application and submitted a revised application in September 2011 to respond to public comments and reduce environmental effects of the project. The project revisions included:

- Eliminating two lots from the project area and reducing the total project area to 4.75 acres
- Reducing the number of proposed residences from 18 to 16
- Changing the originally proposed open-space lot to an open space easement, with the same acreage and dimensions as the originally proposed open space lot

The City has considered the revisions to the project and prepared this Revised Final EIR to aid the Planning Commission and the public in understanding the changes and the effects of the changes to the project.
1.2 Environmental Review Process

1.2.1 DRAFT AND FINAL EIR

The City of Redwood City prepared a Draft EIR, in compliance with the California Environmental Quality Act (CEQA) and the CEQA Guidelines. The purpose of the EIR is to inform the decision makers and the public of the potential environmental impacts that may result from implementation of the proposed project. The Draft EIR was released for public review on February 22, 2010. A 45-day review period was provided, through April 7, 2010, to allow the public and agencies to comment on the adequacy of the Draft EIR.

The Draft EIR was sent to the State Clearinghouse (State Clearinghouse # 2009012058) for review by participating State agencies, pursuant to CEQA Guidelines. A letter was received from the Clearinghouse stating that the project has complied with its review requirements for draft environmental documents under CEQA.

The City received 11 comment letters on the Draft EIR. Comments on the project were also presented at the April 6, 2010 Planning Commission public hearing. Public and agency comments, and the City’s responses to the comments, were provided in the August 2010 Final EIR.

1.2.2 NEW APPLICATION

The applicant withdrew the original application and submitted a new Planned Development Permit application on September 9, 2011. The new application is for a project that is smaller in scope and scale than the original application, covering less land area, and resulting in two fewer residences. The new project would therefore result in either the same or reduced environmental impacts when compared with the impacts of the original project. A brief comparison (by environmental topic) between the original application and the new reduced-scope application is provided below:

- **Aesthetics**: The reduced number of proposed residences would reduce the change to the landscape and views. The amount of proposed open space would stay the same as in the Draft EIR.

- **Air Quality**: The revised project would result in less soil disturbance with the elimination of two of the proposed residences, which would reduce the amount of dust generated during construction activities. Construction of fewer residences would also reduce the amount of criteria pollutants produced from construction vehicles and construction activities.

- **Biological Resources**: The revised project would have less effect on vegetation and wildlife due to the reduced area of disturbance.

- **Cultural Resources**: The revised project would have a reduced potential to affect previously undiscovered cultural resources due to the reduced area of disturbance.

- **Geology, Soils, and Seismicity**: The revised project would reduce the effects on geology, geologic hazards, soils, and seismicity due to the reduced area of ground disturbance.

- **Hazards and Hazardous Materials**: The revised project would reduce the effects related to hazards and hazardous materials by reducing the volume of hazardous materials that would be used during residential construction.

- **Hydrology and Water Quality**: The revised project would have a reduced area of disturbance, and would therefore have a reduced effect on surface water, groundwater, drainage, and erosion.

- **Land Use, Planning, Recreation, and Agriculture**: The revised project would have no change in impacts to land use, planning, recreation, and agriculture.

- **Mineral Resources**: The effects to mineral resources would be the same as the original project.
1: INTRODUCTION

- Noise: The revised project would have a reduced construction timeframe of five years compared to the original nine years, and no more than four residences would be allowed to be under construction in any one year. The revised project’s noise impacts would therefore be reduced compared to the original project.

- Population and Housing: The reduction of two houses would not be a substantial change to population and housing impacts.

- Public Services and Utilities: The reduced project would reduce the effects on public services and utilities, as the project would result in fewer homes, fewer residents, and a reduced demand for services and utilities.

- Transportation and Traffic: The reduced number of proposed residences and reduced construction duration (five years instead of nine years) would reduce construction traffic impacts. The reduced number of residences would also reduce the volume of traffic upon occupation of the new residences.

The City of Redwood City has determined that the February 2010 Draft EIR is adequate to address the environmental impacts of the new project, subject to the changes and corrections included in this Revised Final EIR, as the February 2010 Draft EIR analyzes the impacts of the original, similar project with the same or reduced effects.

The changes to the project described herein do not constitute “significant new information,” as defined in CEQA Guidelines §15088.5:

“New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement.”

The revised project would not result in new significant impacts, substantial increase in the severity of an impact, and is not considerably different from the original application. Recirculation of the Draft EIR is therefore not required.

This Revised Final EIR has been prepared to inform the public about the changes to the project application and the subsequent updates to the information contained in the August 2010 Final EIR. The City of Redwood City, prior to making a decision on the project, will consider the Revised Final EIR, including public comments and responses to comments, in conjunction with the Draft EIR.

1.3 Organization of the Final EIR

The Revised Final EIR includes Volume 1 and Volume 2. The Revised Final EIR is organized as follows:

Volume 1

- Chapter 1 (Introduction) contains background information on the project and environmental review process.
- Chapter 2 (Project Description) describes the project based on the applicant's new application submitted on September 9, 2011.
- Chapter 3 (Comments and Responses) describes the format of the comments and responses, provides a list of commenters, and then provides copies of all of the written and oral comments, each followed by the City’s responses to the comments.
1: INTRODUCTION

- Chapter 4 (Revisions and Errata) includes the revisions to the Draft EIR made by City staff, as a result of response to comments, or as a result of the new application, including corrections and modifications of text, tables, and figures and references.
- Appendix A includes the Mitigation Monitoring and Reporting Plan (MMRP) for the project, outlining all of the proposed mitigation measures and assigning responsibility for implementation and, as well as timing for verification that the measure was implemented.
- Appendix B includes a preliminary sewer main analysis prepared by Mr. Roland Haga, the project engineer for the applicant. This analysis addresses one of the comments received from the County of San Mateo Public Works Department regarding the Draft EIR.
- Appendix C includes a table showing the addresses and residence sizes for home in the vicinity of the project. This table was generated by City of Redwood City staff using information supplied by the County of San Mateo Assessor’s Office in June 2011.
- Appendix D includes a table showing the addresses and residence sizes of hillside residential development in Redwood City. This table was generated by the applicant based off of Multiple Listing Service (MLS) data for hillside residences sold between January 1, 2010 and March 31, 2010.
- Appendix E includes the comment letters received during the public review period for the Draft EIR, as well as the comments received at the April 6, 2010 Planning Commission public hearing.
- Appendix F includes the project plans included with the September 9, 2011 Planned Development Permit application.
- Appendix G includes a description of project construction sequencing and staging and a description of the proposed roadway, utility, and drainage improvements, submitted by the applicant and dated received by the City of Redwood City on January 22, 2012.
- Appendix H includes the January 22, 2012 Supplemental Geologic and Geotechnical Report prepared by Cornerstone Earth Group.

Volume 2

- Volume 2 consists of the entire Draft EIR, as distributed on February 22, 2010.
2: PROJECT DESCRIPTION

2.1 Project Definition

The February 2010 Draft EIR contained a detailed description of the original project application. The project application had not changed at the time of the preparation of the August 2010 Final EIR, and a detailed project description was therefore not included in the Final EIR. The applicant submitted a revised project application subsequent to the August 2010 Final EIR, and the City determined that the revised project description should be included in the Revised Final EIR.

This section provides a detailed description of the revised project application. Changes to the original project application are highlighted and underlined, and deleted text is highlighted and struck. Sections 2.1.2 through 2.1.4, as well as Figures 2.1-1 and 2.1-2, have also been added to this project description to highlight the differences between the original application and the revised application.

2.1.1 CHANGES TO THE PROJECT DESCRIPTION WITH THE NEW APPLICATION

The February 2010 Draft EIR for the Laurel Way Project presents an analysis of the original July 2007 application for the Laurel Way Planned Development Project. The applicant withdrew the original application and submitted a new Planned Development Permit application on September 9, 2011. The new application contains the following changes:

- Elimination of two lots (formerly Lots 12 and 13) from the project, reducing the total project area from 5.1 acres to 4.75 acres
- Elimination of the proposal to merge three of the existing parcels and subdivide them into two parcels, resulting in one parcel for residential development (formerly Lot 5) and one parcel to remain in open space (formerly Lot 6). The new application still includes the merger of the same three parcels, but no longer includes subdividing them into two new parcels
- Replacement of the proposal to create an open space parcel (formerly Lot 6) with a private open space/conservation easement that would encompass the same land area and pass through the new parcel created through the lot merger
2.1.2 PROJECT OVERVIEW

The proposed project identified in this EIR is the approval of a planned development permit for a 5.1 4.75-acre residential subdivision development, construction of a private roadway connecting to city existing private streets, extension of city utilities to the residential lots, and construction, maintenance, and operation installation of retaining walls and parking areas along the new street (extension of Laurel Way), and an open space easement serving the hillside development. The project also includes construction of 18 16 new residences. Specific elements of the project are as follows:

- Approval of a Planned Development (PD) permit for the approximately 5.1 4.75-acre property project area in the Residential-Hillside (R-H RH) zoning district
- Approval of a Development Agreement for the staging and scheduling of project construction
- Review of the Covenants Conditions and Restrictions (CC&Rs) for the Planned Development
- Amendment of the original 1926 subdivision map of record to incorporate the Planned Development, residence placement, public improvements, and utility layouts and to incorporate the CC&Rs for the development
- Approval of the connection of the proposed private roadway to city streets and improvement of the access road to city standards
- Acceptance of the dedication of the new utilities
- Approval of a Tentative Dedication of public improvements and utilities
  - Approval of a Parcel Map for the merger of three of the existing 18 lots and a subsequent splitting into two lots, including one lot (Lot 6) within the drainage area to dedicate to
  - Creation of a private open space/conservation easement, and a second lot (Lot 5) for the construction of a across the rear of the three newly merged parcels to encompass the existing drainage channel on the site
  - Dedication of additional public right-of-way access easements from each some of the lots within the project limits area in order to accommodate the road widening, public ingress and egress easements, and emergency vehicle access easements, and public utility easements for the Laurel Way extension
  - Approval of the construction of single-family residences on 18 of the 20 16 parcels that comprise the approximately 5.1 4.75-acre property, with the remaining parcel (Lot 6) to be held as an open space easement project area

This section of the EIR presents information that provides the reader with a basic understanding of the project for the purposes of evaluating implementation of the Laurel Way Project in accordance with the California Environmental Quality Act (CEQA) and CEQA Guidelines. This project description presents the following relevant information about the proposed residential development:

- Project objectives
- Project background and setting
- Project description
- Permits and approvals
2.1.3 CHANGES TO LOT NUMBERS BETWEEN THE ORIGINAL AND NEW PROJECTS

The new application uses a different lot numbering system than was used in the original application. The new project plans are included in Appendix F. The Draft EIR and the Revised Final EIR will not be amended to reflect the new lot numbers. The following conversion should be used when reading the text of the February 2010, Draft EIR:

- “Lot 5” will generally refer to the developable portion of Lot 14A, Block 18, which would be created from the merger of Lot 12, Block 18; Lot 13, Block 18; and Lot 14, Block 18.
- “Lot 6” or references to the “open space lot” will refer to the private open space/conservation easement along the rear of Lot 14A, Block 18.
- “Lot 12” or “Lot 13” in the text should be disregarded, as these two parcels are no longer part of the project area.

Table 2.1-1 provides a conversion guide between the original and new lot numbering systems, and Figures 2.1-1 and 2.1-2 show the original lots and the new lots.

<table>
<thead>
<tr>
<th>Original Application Lot #</th>
<th>New Application Lot #</th>
<th>Original Application Lot #</th>
<th>New Application Lot #</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Lot 18, Block 18</td>
<td>11</td>
<td>Lot 1, Block 17</td>
</tr>
<tr>
<td>2</td>
<td>Lot 17, Block 18</td>
<td>12</td>
<td>N/A²</td>
</tr>
<tr>
<td>3</td>
<td>Lot 16, Block 18</td>
<td>13</td>
<td>N/A²</td>
</tr>
<tr>
<td>4</td>
<td>Lot 15, Block 18</td>
<td>14</td>
<td>Lot 1, Block 16</td>
</tr>
<tr>
<td>5</td>
<td>Lot 14A, Block 18</td>
<td>15</td>
<td>Lot 2, Block 16</td>
</tr>
<tr>
<td>6</td>
<td>Lot 14A, Block 18</td>
<td>16</td>
<td>Lot 3, Block 16</td>
</tr>
<tr>
<td>7</td>
<td>Lot 11, Block 18</td>
<td>17</td>
<td>Lot 4, Block 16</td>
</tr>
<tr>
<td>8</td>
<td>Lot 10, Block 18</td>
<td>18</td>
<td>Lot 5, Block 16</td>
</tr>
<tr>
<td>9</td>
<td>Lot 9, Block 18</td>
<td>19</td>
<td>Lot 6, Block 16</td>
</tr>
<tr>
<td>10</td>
<td>Lot 8, Block 18</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Notes:

1. The original application included the merging of three lots to be subdivided into two lots (Lots 5 and 6).
2. The new application includes the merger of the same three lots (Lot 12, Block 18; Lot 13, Block 18; and Lot 14, Block 18) to create Lot 14A, Block 18, but eliminates the subdivision of this newly merged lot into two new lots.
3. These two parcels have been eliminated from the new application and are no longer part of the project area.

2.1.4 CHANGES TO THE CONSTRUCTION TIMELINE BETWEEN THE ORIGINAL AND NEW PROJECTS

The original application limited residential construction to no more than three residences at one time, with construction defined as grading, foundation, framing, and other exterior work. Interior and finishing work would be exempt from this limitation. The original application also allowed for any unused construction slots in one year to carry over to the succeeding years, provided that the total number of residences constructed in any two-year period did not exceed six residences. The
Figure 2.1-1: Laurel Way Site Layout – Original Application

Legend:
- Red: Proposed Project Area Boundary
- Blue: Boundary of Area Subject to City Council Policy Requiring Preparation on an EIR
- Yellow: Lot Area Boundary

Scale: 1:1,500
Figure 2.1-2: Laurel Way Site Layout – New Application
analysis in the February 2010 Draft EIR therefore assumed a “worst-case” scenario where up to six residences would be under construction in a single year.

The new application would limit residential construction to no more four residences at one time, with construction defined as grading, foundation, framing, and other exterior work. Interior and finishing work would be exempt from this limitation. The new application would not allow for any unused construction slots in one year to carry over into succeeding years, and therefore no more than four residences could be built per year under the new application.

The construction up to four residences per year as proposed in the new application is less than the up to six residences per year used for the impact analyses in the February 2010 Draft EIR. The changes to the number of residences that could be built per year would therefore not result in impacts that exceed those analyzed in the February 2010 Draft EIR.

### 2.2 Project Objectives

CEQA requires that an EIR include:

…a statement of objectives sought by the proposed project. A clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project.

There are currently 1614 parties who own one or more of the 2018 existing parcels that comprise the project area. The specific objectives for the project may vary between individual property owners. Owners of the lots could, if the project is approved:

- Apply for architectural Planned Development permits through the City’s design review process, followed by applying for building permits to construct a residence, immediately upon obtaining approvals of the proposed project
- Delay construction of a residence
- Construct a residence for purposes of sale
- Build a home as a personal residence
- Sell the lot with rights to develop as granted with the project approval and/or with plans for a proposed house design

The basic and overall objective of the Laurel Way Project (the proposed applicants project) is to provide the various property owners objectives include the following:

- To develop and construct a private roadway meeting City standards, including fire safety standards
- To create a permanent open space area
- To construct 16 single-family homes commensurate with a legal mechanism to allow City hillside residential development of existing subdivided lots of record that would be compatible with the surrounding neighborhood, provide access to the lots, regulations and architectural standards
- To provide utilities to existing lots
- To improve drainage and infrastructure such as retaining walls around Laurel Way
- To improve emergency services and paved roads access to homes on upper Laurel Way
Figure 2.3-1: Proposed Project Location

[Map showing the proposed project location in the context of the state of California, with labels for city names and major highways.]
2.3 Project Background

2.3.1 PROJECT AREA CHARACTERISTICS

The subject property project area is located at the end of Laurel Way in the Emerald Hills neighborhood of Redwood City (see Figure 2.3-1) and totals approximately 5.14.75 acres. The hillside parcels on the project site range in size from between approximately 7,200 to 14,200 square feet, which is similar to the parcel sizes found elsewhere in the general neighborhood. The neighborhood is substantially built out with single-family dwellings. Based on assessor’s parcel number (APN) information obtained from the County Assessor’s Office, the existing residences in the area range in size from approximately 1,000 to 4,000 square feet, and average approximately 2,141 square feet in size (including two-car garages). Most of the nearby residential development is also located on hillsides of various slopes. Figures 2.3-2 and 2.3-3 show the topography and relative steepness of the slopes in the vicinity of the project site. The topography shown in these two figures is an approximation of natural grade prior to residential development.

Laurel Way is currently a private, dead-end street that is developed with approximately 14 residences and three undeveloped parcels along the paved portion of its one-half mile length. The public street portion of Laurel Way owned by the City of Redwood City terminates in front of the developed lot at 3725 Laurel Way. The remaining paved portion of Laurel Way is approximately 270 feet long, and has not been accepted for dedication by the City of Redwood City. It ends just past 3737 Laurel Way. The owners of the four properties that front onto this private portion of Laurel Way are responsible for the maintenance of this paved portion of the roadway. None of the developed parcels fronting onto either the public or private paved portions of Laurel Way are part of the project area.

Beyond the paved portion of Laurel Way, the roadway narrows to approximately 10 feet wide, and is an unimproved dirt roadway extending onto the approximately 5.14.75-acre subject property project area. The unimproved portion of Laurel Way is approximately 720 feet long. There are two additional residences along the unpaved portion of Laurel Way. Though these two residences are located along the unpaved portion of Laurel Way, the owners of these two residences are not among the applicants included in the project proposal. There are also three undeveloped parcels along the unpaved portion of Laurel Way that are not part of the project area.

The existing public and private portions of Laurel Way do not provide sufficient turn around space to allow emergency vehicles to access and exit any portion of Laurel Way. The approximately 5.14.75 acres that comprise the subject property project area are currently subdivided into 20 parcels. As part of the project, the applicant is requesting approval of a Tentative Parcel Map that would merge three of these parcels and then divide them into two parcels, creating Lots 5 and 6. Lot 14A, Block 18. The Tentative Parcel Map would also include the dedication of additional public right-of-way easement from some of the lots within the project limits to accommodate the road widening, public ingress and egress easements, emergency vehicle access easements, retaining walls, and public utility easements for the Laurel Way extension. Once this division has been completed, the project site would
Figure 2.3-2: Average Slopes in the Project Area

Slope data calculated using ArcInfo 9.3.1 GIS with the Spatial Analysis extension using USGS Digital Elevation Model data. For comparative representation only. Slope legend classification with Natural Breaks (Jenks) which groups similar values and maximizes differences between classes.


LEGEND
- Proposed Project Area
- 3 Foot Contour
- Proposed Private Open Space
- Conservation Easement
- Parcel with APN
- 30 Foot Index Contour

- Project Lot with Number

Scale: 0 to 500 Feet

0 50 100 150 200 250 500
Figure 2.3-3: Topography of the Project Area

SOURCE: City of Retwood City 2009 and Panorama Environmental, Inc. 2012

LEGEND
- Proposed Project Area
- Project Lot with Number
- Parcel with APN
- 3 Foot Contour
- 30 Foot Index Contour
- Proposed Private Open Space Conservation Easement

PANORAMA ENVIRONMENTAL, INC.
contain 1816 parcels, ranging in size from approximately 7,200 square feet to approximately 14,200 square feet. Three of the lots on the eastern side of Laurel Way are accessed from the existing private paved portion of the roadway, while the remaining 1613 lots are accessed by the existing unimproved roadway. None of the project parcels have been extensively graded or developed, maintaining natural slopes and vegetation that are interrupted only by the existing unimproved dirt roadway. The average slopes on the project parcels range from 19 percent to 41 percent for, while the proposed residential parcels average slope of the private open space/conservation easement would be 45 percent for the proposed open space parcel. The overall average slope of the project area is 35 percent. Table 2.3-1 lists the square footage and slope information for each lot.

The subject property is surrounded on all sides by single-family residences built on varying slopes. Most of these residences were constructed in the 1970s and 1980s. Due to the sloping nature of these hillside developments, many of the residences are two- or two-and-a-half-story tall dwellings. Down the hill from the subject property is the George L. Garrett Junior Memorial Park, a 6.9-acre park with playground facilities, a tot play structure, picnic areas, and barbeque facilities.

2.3.2 HISTORY OF THE PROPERTY

The subject lots were created as part of a residential subdivision in 1926 when the property was in the unincorporated San Mateo County jurisdiction. The unimproved portion of Laurel Way was never accepted as a public street by the County. The City of Redwood City annexed the subdivision in 1969, and the City also did not accept dedication of the unimproved portion of Laurel Way. In 1970, the City prepared improvement plans for the private street, including the addition of retaining walls, but the improvements were never constructed due to lack of interest by some of the property owners.

In 1988, the City Council adopted a policy that an EIR would be required prior to any new development on the western half of Laurel Way. This EIR would analyze the full build-out of the street, with a goal of establishing guidelines for any future development. The City Council stated that it wished to avoid piecemeal development in an area that is constrained by planning, engineering, and environmental issues. The City Council reaffirmed this policy in 2000.

Since 2000, 1614 of the property owners (owning 21 undeveloped parcels on the undeveloped portion of Laurel Way) formed the Laurel Way Joint Venture (LWJV) to submit an application for a Tentative Parcel Map to merge three lots into two lots, to create a right-of-way dedication from each of the lots, public access easements for road widening, public ingress and egress easements, emergency vehicle access easements, on-street parking and public utility easements for the Laurel Way extension; to create a private open space/conservation easement along the rear of the newly merged parcel; and to secure a PD Permit to allow for construction of single family residences on 18 of the 16 parcels that would exist following approval of the Tentative Parcel Map. The LWJV also would receive approval to extend utilities and construct a private road to access all of the parcels. The application requires preparation of an EIR for the project as directed by the City Council.

2.3.3 PLANNED DEVELOPMENT PERMITS

The property is designated Low Density Residential (LDR) under the General Plan and Residential-Hillside (R-HRH) under the Zoning Ordinance. A key purpose of the R-H land use designation is to allow development in the “hilly areas of Redwood City commensurate with the natural topography of the area and with the type of semi-rural living best
### Table 2.3-1: Parcel Size and Slope (Proposed) of Original Lots

<table>
<thead>
<tr>
<th>Lot #</th>
<th>Lot Area (sf)</th>
<th>Average Slope (%) for the Entire Lot¹</th>
<th>Average Slope (%) for the Proposed Development Envelope within the Lot²</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>11,0010.290</td>
<td>34%</td>
<td>32%</td>
</tr>
<tr>
<td>2</td>
<td>10,70010.490</td>
<td>33%</td>
<td>30%</td>
</tr>
<tr>
<td>3</td>
<td>9,909.650</td>
<td>36%</td>
<td>36%</td>
</tr>
<tr>
<td>4</td>
<td>9,408.970</td>
<td>37%</td>
<td>42%²</td>
</tr>
<tr>
<td>5</td>
<td>13,2024.525</td>
<td>40%</td>
<td>45%²</td>
</tr>
<tr>
<td>6³</td>
<td>14,200</td>
<td>45%</td>
<td>N/A⁴</td>
</tr>
<tr>
<td>7</td>
<td>10,80010.460</td>
<td>33%</td>
<td>33%</td>
</tr>
<tr>
<td>8</td>
<td>8,308.665</td>
<td>37%</td>
<td>37%</td>
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<td>9</td>
<td>10,10010.640</td>
<td>29%</td>
<td>25%</td>
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<tr>
<td>10</td>
<td>12,8003.450</td>
<td>30%</td>
<td>31%³</td>
</tr>
<tr>
<td>11</td>
<td>7,2007.610</td>
<td>19%</td>
<td>19%</td>
</tr>
<tr>
<td>12⁴</td>
<td>9,400</td>
<td>27%</td>
<td>27%</td>
</tr>
<tr>
<td>13⁴</td>
<td>7,400</td>
<td>33%</td>
<td>32%</td>
</tr>
<tr>
<td>14</td>
<td>7,4007.750</td>
<td>41%</td>
<td>43%³</td>
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<tr>
<td>15</td>
<td>7,6007.985</td>
<td>40%</td>
<td>43%³</td>
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<tr>
<td>16</td>
<td>7,9008.375</td>
<td>38%</td>
<td>40%³</td>
</tr>
<tr>
<td>17</td>
<td>8,2008.545</td>
<td>38%</td>
<td>40%³</td>
</tr>
<tr>
<td>18</td>
<td>7,7008.015</td>
<td>39%</td>
<td>39%</td>
</tr>
<tr>
<td>19</td>
<td>8,8008.695</td>
<td>41%</td>
<td>42%⁴</td>
</tr>
<tr>
<td>Average</td>
<td>9,56310.253</td>
<td>35%</td>
<td>35%</td>
</tr>
</tbody>
</table>

**Notes:**

¹ Calculated as per City of Redwood City Zoning Ordinance regulations

² The proposed development envelope is that portion of each lot that would be within the setback requirements proposed in the PD application

³ The natural average grade on these lots is greater for the proposed development envelope than for the lot in its entirety. Proposed development would be as close to the street as possible, and on these lots, that would mean development on the steepest portion of the lot

⁴ As shown in Table 2.1-1, the originally proposed Lot 6 is now proposed to be an open space lot, and no residential development is proposed on this lot. A new Planned Development application plans, dated January 6, 2012

**Source:** Project plans prepared by BKF Engineers, dated date-stamped received October 28, 2008 and updated February 17, 2009
suited to relatively low density family living in the hills” (Ordinance 1130, eff. 7-10-64).

Furthermore, the PD process can be separated into two parts. First, a comprehensive PD permit would be required that would regulate the overall proposed development. This PD would define the project area, describe open space, common areas, and infrastructure improvements, and indicate general building areas on the lots. Subsequent individual PD permits would then be required for the construction of each single-family residence within the overall PD area.

Article 32.2 of the Redwood City Municipal Code establishes minimum lot sizes for newly created lots based on the average slope of a property. The regulations range from a minimum lot size of 6,200 square feet for a lot with an average slope of 6 percent, up to a minimum lot size of 30,000 square feet for a lot with an average slope of 30 percent. For lots with slopes greater than 30 percent, the city’s regulations require approval of a PD permit by the Planning Commission. Four of the lots in the project area have average slopes ranging from 19 to 30 percent, but none of these lots would meet the minimum lot area requirements of Article 32.2. The remaining 15 lots in the project area have average slopes exceeding 30 percent. All of the lots on the project site are legal lots of record, but are non-conforming with the R-HR zoning regulations regarding the relationship between lot size and average slope. The property owners have a right to develop these lots under Section 33.2 of the Zoning Ordinance, and a PD permit is required for the development of any of the subject lots.

**Intent of Planned Development Permits**

PD permits are intended to:

- Provide a vehicle for planned development within existing zoning districts
- Encourage flexibility of design in order to promote the most appropriate use
- Encourage the appropriate solutions for architecture, building materials, and aesthetic relationships between adjacent uses and buildings
- Encourage the development of quality open space
- Encourage the development of quality open space

Pursuant to Article 46 of the Zoning Ordinance, the purpose of a Planned Development Permit is to provide a vehicle for planned development within the existing zoning districts of the City of Redwood City; to encourage flexibility of design and development of land in such a manner as to promote its most appropriate use; to encourage the development of innovative projects which incorporate the highest quality architectural solution, building materials, and landscaping concepts; to promote the most functional and aesthetic relationships between building structures, signs, open space, and parking areas in residential, commercial, and industrial zoning districts; to encourage the development of quality open space and recreational opportunities within projects, including providing for clustered development and increased open space; and to incorporate stormwater treatment provisions in site planning. PD permits allow for clustered development and increased open space, and allow projects to fully incorporate stormwater treatment provisions in site planning.

In reviewing and approving a proposed PD application, the Planning Commission may permit modifications to certain requirements of the existing zoning regulations if it determines that the proposed development would provide an environment of physical and functional desirability, in harmony with the character of the surrounding neighborhood or district. Items that the Planning Commission may modify include:

1) Maximum heights for structures
2) Maximum lot coverage
2: PROJECT DESCRIPTION

3) Minimum building site sizes
4) Minimum front, side, and rear yard setback requirements
5) Access requirements and extension of utilities
6) Signage ordinance regulations relating to the number, location, height, and size of signs
7) Minimum number of parking spaces required, and the design of parking spaces and parking lots

The General Plan and Zoning Ordinance typically permit development under either the standards of the R-H zoning designation, or under the development standards created by a PD permit. Under the PD option, the project may be designed with superior site planning and considerations for:

- Slopes
- Residence locations
- Parking
- Neighborhood Context
- Architecture
- Heritage tree preservation
- Stormwater and drainage management
- Relationships between buildings and sites
- Topography
- Landscaping
- Overall design
- Natural site features
- Improved public access and safety
- Open space

The Planning Commission is empowered to grant approval should it find that the PD is superior to the layout and design prescribed strictly by the R-H zoning requirements.

Timing of Development under the Planned Development Process

An important consideration for the owners of the lots in the Laurel Way Planned Development is the requirement in the Zoning Ordinance that all development be completed within five (5) years of its start from the date and that development begin within one year of receiving a building permit of issuance of the PD Permit (Article 46.11 of the Redwood City Zoning Ordinance). The Zoning Ordinance allows for The City implements the PD permit regulations by requiring that an applicant maintain a valid building permit and demonstrate a one-time, one-year extension of the PD permit; good faith effort to complete construction activities. Should development of any portion of the project not be completed as applied for within the allowable timeframe, then a PD Amendment and possibly Homeowner’s Association (HOA) approval would be necessary for additional new home construction. PD permit shall be required.

The City also has the option of entering into a Development Agreement with the applicant in order to set timelines for the construction of residences under Phase II of the project, (as further described below) would require approval of a separate PD permit application for each new residence. The applicant has submitted a draft Development Agreement (Appendix O) a five-year window within which to complete construction. The new application anticipates one year for the construction of the roadway, drainage, and utility improvements under Phase I, and that would increase the construction window of the residences under Phase II will need to eight (8) be completed within the remaining four years, with an option for a one-time, one-year extension. The draft Development Agreement, The development of any residences not completed within the five-year PD permit timeframe would require approval of a new PD permit.

The new application also places limits on the maximum number of residences that could be under construction at one time. The draft Development Agreement new application would limit residential construction to no more than three four residences at one time, with construction defined as grading, foundation, framing, and other exterior work. Interior and finishing work would
be exempt from this limitation. The draft Development Agreement new application would also not allow for any unused construction slots in one year to carry over to the succeeding years, provided that the total number of residences constructed in any two-year period not exceed six residences.

The analysis in this EIR assumes that the provisions of the draft Development Agreement are adopted for this project, such that construction of Phases I and II would be completed within an eight/five-year construction window, and no more than six/four residences would be under construction during any one/two-year period.

2.4 Project Description

2.4.1 PROPOSED PROJECT OVERVIEW

The proposed project involves the approval of a PD Permit overlay that would allow for the construction of single-family residences on 18 of the 19/16 parcels that would comprise the project area after the approval of the Tentative Parcel Map. The remaining undeveloped parcel created through the merger of three existing parcels would contain a private open space/conservation easement, containing the unnamed seasonal creek that travels through the property/project area from the southwest downhill to the northeast.

Permitted Uses in the Proposed Planned Development (PD)

The applicant’s PD application (Appendix F) outlines the permitted uses and development standards that would be established for the subject parcels; the proposed standards would modify the development standards of the underlying R-HRH zoning designation. Table 2.4-1 compares the development regulations of the R-HRH zoning district with the proposed regulations under the PD.

The proposal also includes a prohibition on the use of wood burning stoves and fireplaces.

Access Road

The proposal also includes the expansion and paving of the existing Laurel Way roadway to create paved access to the subject parcels, as well as to the two developed parcels and three undeveloped parcels that also front onto the existing dirt roadway and are not part of the project. The access road would also include a sidewalk along the northern side of the street, curb and gutters on both sides of the street, and room for eight on-street parking spaces.

Construction Sequencing

The sequencing of construction activities is fully described in a letter submitted by the applicant and included in Appendix G. The roadway, utility, and drainage improvements would be performed as Phase I of the project, as would the planting of all proposed replacement trees in the street right-of-way, along the shared side property lines between lots, and in the proposed bioswale and drainage areas. Phase II of the project would include the construction of the individual residences. During Phase I, the construction of the new paved private street, drainage infrastructure, utilities, retaining walls, and landscaping would occur during a period of one construction season (summer/fall) and be completed to the satisfaction of the City.

The timing of the home construction in Phase II is unknown due to the fact that the property owners have different schedules and goals. However, the applicant’s draft Development Agreement PD permit would require the completion of the entire project within eight/five years of granting the PD permit.
Table 2.4-1: Comparison of Existing RH Zoning and the Proposed PD Permit

<table>
<thead>
<tr>
<th>Regulation</th>
<th>RH Zoning District</th>
<th>Proposed PD Permit</th>
</tr>
</thead>
<tbody>
<tr>
<td>Permitted Uses</td>
<td>Single-family dwellings and accessory dwellings</td>
<td>Single-family dwellings and only accessory structures that do not require a building permit (such as sheds under 120 S.F.)</td>
</tr>
<tr>
<td>Accessory Uses</td>
<td>Guest houses or servant quarters not containing cooking facilities, and not rented or otherwise operated for profit</td>
<td>Guest houses or servant quarters not containing cooking facilities, and not rented or otherwise operated for profit, if incorporated into the main structure</td>
</tr>
<tr>
<td></td>
<td>Home occupations</td>
<td>Home occupations</td>
</tr>
<tr>
<td></td>
<td>Other accessory uses and structures customarily appurtenant to a permitted use</td>
<td>Other accessory uses and structures customarily appurtenant to a permitted use</td>
</tr>
<tr>
<td></td>
<td>Family child care homes</td>
<td>Family child care homes</td>
</tr>
<tr>
<td></td>
<td>Child Care Centers in conjunction with public or quasi-public uses</td>
<td>Family child care homes</td>
</tr>
<tr>
<td></td>
<td>Large Family Child Care Home</td>
<td>Family child care homes</td>
</tr>
<tr>
<td>Height Regulations</td>
<td>No structures shall exceed two and one-half stories or 28 feet in height, whichever is greater</td>
<td>No structures shall exceed two and one-half stories or 32 feet in height, whichever is greater 28 feet parallel to natural grade</td>
</tr>
<tr>
<td>Minimum Lot Size</td>
<td>10,000 square feet</td>
<td>7,000 square feet (existing)</td>
</tr>
<tr>
<td>Minimum Lot Width</td>
<td>60 feet average</td>
<td>As existing</td>
</tr>
<tr>
<td>Minimum Lot Frontage</td>
<td>35 feet</td>
<td>45 feet (existing)</td>
</tr>
<tr>
<td>Maximum Lot Coverage</td>
<td>40% of the entire lot</td>
<td>40% of the entire lot, including all buildings and hardscape</td>
</tr>
<tr>
<td></td>
<td>40% of the required rear yard for accessory buildings</td>
<td>40% of the required rear yard for accessory buildings</td>
</tr>
<tr>
<td>Minimum Front Yard Setback</td>
<td>25 feet (20 feet for lots under 10,000 square feet in lot area)</td>
<td>10 feet, 18 feet from edge of garage door to edge of curb</td>
</tr>
<tr>
<td>Minimum Side Yard Setback</td>
<td>7 feet minimum per side, 15 feet total</td>
<td>7.5 feet</td>
</tr>
<tr>
<td>Minimum Rear Yard Setback</td>
<td>25 feet</td>
<td>25 feet, except for the three triangularly shaped lots (Lots 5, 7, and 11), which will have a minimum rear yard setback of 15 feet</td>
</tr>
<tr>
<td>Minimum Pervious Area</td>
<td>40% of the lot</td>
<td>60% of the lot</td>
</tr>
<tr>
<td>Minimum Pervious Front Yard Area</td>
<td>60% of the front yard</td>
<td>None 60% of the front yard</td>
</tr>
<tr>
<td></td>
<td>For lots with less than 50 feet in average width, a maximum width of 20 feet can be devoted to driveway and parking</td>
<td>For lots with less than 50 feet in average width, a maximum width of 20 feet can be devoted to driveway and parking</td>
</tr>
<tr>
<td>Maximum Slope</td>
<td>Varies by lot size, with any lot with an average slope greater than 30% requiring approval of a Planned Development Permit</td>
<td>39%-41% (existing)</td>
</tr>
<tr>
<td>Maximum House Size</td>
<td>None</td>
<td>See Table 2.4-4</td>
</tr>
</tbody>
</table>

Notes:
1. See Table 2.3-1 for the average slope of each of the subject lots.

SOURCE: City of Redwood City Municipal Code
2.4.2 PHASE I – ROADWAY, UTILITY, AND DRAINAGE IMPROVEMENTS

The applicant has submitted a letter (Attachment H Appendix G) that describes the various roadway, utility, and drainage improvements proposed as part of this project. Sheet 15 of the project plans (Appendix F) describes the three sub-phases for the construction of the roadway, utility, and drainage improvements. These proposed improvements are described in detail below.

Laurel Way Roadway Improvements

The Laurel Way roadway improvements would include replacing the existing one-lane, substandard, dirt roadway with a paved and improved two-lane roadway. The improved road would be 14 feet wide for each lane where the two lanes of traffic are split by a retaining wall, and up to 28 feet wide elsewhere. The roadway would be designed to allow simultaneous ingress and egress, and would also be wide enough to accommodate emergency vehicle access and allow for the emergency vehicle turn around space that is currently lacking on both the public paved and private unpaved portions of Laurel Way. The new roadway would be approximately 720 feet in length, and would terminate in a cul-de-sac. The improved roadway would include 5-foot-wide sidewalks on one side of the road, as well as cutouts on both sides of the road to allow for on-street parking of up to eight vehicles. The new total width of the road and sidewalks would be an average of approximately 34 feet. Rural style street lights would be included along this improved portion of Laurel Way, and would be designed for safety, as approved by the City of Redwood City. The roadway would remain private and would not be dedicated as a public street; however, the PD permit would require that the roadway remain open and accessible to the public.

The first portion of the Laurel Way extension would become a split-level roadway to accommodate the steep slopes on that portion of the property project area. Westbound traffic would be on the lower lane of the roadway, while the eastbound traffic would be on the upper lane. These two lanes would be separated by a reinforced concrete retaining wall that would vary in height from 2 feet to 16 feet, with an average of 8 feet in height. Additional retaining walls would be required at the outside edges of both lanes of traffic. The two portions of the roadway would reunite shortly before the northeast trending bend in the roadway, and would remain joined for the remainder of the length of the roadway to the cul-de-sac (see Figure 2.4-1 for the revised site plan).

An additional reinforced concrete retaining wall would be required at the lower side of the roadway where it bends to head north to the cul-de-sac. This retaining wall is proposed to address the grade differential due to the widening of the road in this area. The retaining wall would also be intended to help stabilize the stream bank erosion and landslides that have occurred at the outlet of the drainage culvert that is also at this location. The retaining wall would vary in height from approximately 5 feet to maximum height of 11 feet in the area of the existing drainage swale.

The applicant intends to maintain roadway access for the two existing residences on the unimproved portion of Laurel Way throughout the construction process, by maintaining residential access on the existing dirt roadway while the upper portion of the split-level roadway is constructed. Once the upper portion of the new roadway is complete, the residents of the two existing homes would use the upper roadway for access while construction commences on the lower portion of the roadway.

Utility Improvements

The improved roadway would also provide the location for the utility improvements needed for the project area. The utilities that would be placed within the roadway include improvements to convey, store, and treat stormwater runoff, a series of sanitary sewer extensions, a water main extension to create a looped water system, and new underground electric, telephone, cable, and gas lines. All of these new utilities would serve the undeveloped parcels. The two existing residences on this portion of Laurel Way are already served by existing utilities.
Figure 2.4-1: Revised Site Plan

SOURCE: BKF 2012
Sanitary sewer service would be provided to the project site through three sewer line extensions from three separate locations. The first extension would start at the terminus of the existing paving for Laurel Way, where a sewer line already exists. This sewer line would be extended beneath the new roadway, and would serve Lots 1 through 5 and Lots 17 through 19. The second and third sewer line extensions would begin near the bend in the roadway, where the existing sewer service for 3765 and 3769 Laurel Way terminate. The first of these two extensions would begin in the roadway just north of 3769 Laurel Way, and extend beneath the new roadway to service Lots 14 through 16. The second of these two extensions would begin in the roadway to the east of 3765 Laurel Way, and would extend north beneath the new roadway to service Lots 7 through 13. 

(Note: Lot 6 would be dedicated as an open space lot and would not require sewer service).

Water service for Lots 3 through 19 would be supplied by a new 8-inch water line. The new water line would begin at the northwest corner of the project area. A new 10-foot utility easement would be created at the shared property line between Lots 10 and 11, and from there would access the new roadway. The new water line would travel nearly the entire length of the improved portion of Laurel Way, terminating near the edge of Lot 3. Lots 1 and 2 would be served by a 6-inch water line that already exists in the paved portion of Laurel Way.

### Drainage Improvements

Phase I of the project would include extensive drainage improvements on the site. These improvements would include replacing the culvert at the roadway drainage crossing, adding stormwater drainage improvements to the street, and constructing various drainage improvements on each of the subject parcels.

### Culvert Improvements

The roadway improvements would necessitate corresponding improvements in the culvert system beneath the roadway, both for the roadway widening itself and for erosion control downstream of the culvert outfall.

Currently, the existing 18-inch diameter metal culvert cannot accommodate stormwater flows during a 10-year storm event, resulting in localized flooding and overtopping of the roadway. The outfall of the existing culvert is also not properly engineered, and results in downstream stream bank erosion and localized landslides.

The proposed project would include replacing this existing culvert with a 24-inch diameter pipe that would accommodate the 100-year flood event. Due to the widening of the roadway and the need to place new utilities within the street right-of-way, the new culvert beneath the roadway would be approximately 55 to 60 feet long. The new culvert would extend approximately 30 feet beyond the edge of the existing driveway to the new retaining wall, where the culvert discharges directly into the existing drainage swale. Erosion protection at the outfall of the culvert would consist of rock rip-rap at the bottom and banks of the swale, and would continue approximately 25 feet beyond the outfall. The total length of the new culvert and additional rock rip-rap erosion protection would be between 80 and 85 feet.

### Roadway Stormwater Drainage Improvements

Stormwater on the roadway would drain into collection pipes that would discharge into three filtration units at the bend in the roadway. These collection pipes would also carry stormwater drainage from Lots 11 through 19. The three filtration units would treat the stormwater runoff prior to discharge into the culvert and drainage swale.
Stormwater Drainage Improvements per Parcel

Stormwater drainage infrastructure would be installed on all parcels within the project area, including Lot 6 within the private open space/conservation easement. The proposed drainage improvements include stormwater storage, treatment, conveyance, and energy dissipation facilities. Since the topography and location in regard to the unnamed seasonal creek vary for each of the lots, the proposed infrastructure for each lot would be tailored to each lot’s needs. The specific infrastructure improvements by lot are described below.

Lots 1 through 4: Stormwater detention pipes would be constructed toward the rear of each of these four lots. Each detention system would include a 36-inch diameter pipe that would be approximately 20 feet long, and would include a restrictor to control release of stormwater flows. The pipes would release into a vegetated swale toward the rear of Lots 3 and 4, which would in turn connect to a storm drain line at the rear of Lot 5. This storm drain line would have an outfall into the unnamed seasonal creek on Lot 6.

Lot 5: A bio-retention basin would be constructed toward the rear of this lot. The basin would be approximately 60 feet wide and would be supported by a 4-foot-tall retaining wall. The basin created by the retaining wall would have 9 inches of pond depth, and would contain deep-rooted perennial plants and grasses. The media within the basin would consist of 21 inches of a sand and compost mix, which would be underlain by 12 inches of drain rock. The bio-retention basin would be sized to accommodate a 100-year event storage volume. The basin would release stormwater into a storm drain line, which in turn would connect to the storm drain line that would drain the vegetated swale for Lots 1 through 4.

Lot 6 and the Storm Drainage Channel: The improvements to the culvert and drainage outflow would extend into the uphill portion of Lot 6. At the bottom of Lot 6, the infrastructure improvements would include the two storm drain lines and lateral spreaders that would drain stormwater from Lots 1 through 5 and Lots 7 through 10 into the unnamed seasonal creek. No other treatment or storage facilities are proposed for Lot 6.

Lots 7 through 10: Bio-retention basins would be constructed toward the rear property lines of each of these four lots. Each of these four bio-retention basins would be similar in size and design to the basin proposed for Lot 5. The four basins would release stormwater into connected storm drain lines that would ultimately drain into the existing unnamed seasonal creek. As with the storm drain line for Lots 1 through 5, a lateral spreader would be located at the outfall into the seasonal creek to reduce the energy of the stormwater and reduce erosion effects on the creek banks.

Lots 11 through 13: Stormwater detention pipes would be constructed on each lot. Each detention system would include a 36-inch diameter pipe that would be approximately 20 feet long, and would include a restrictor orifice for controlled release of stormwater flows. The pipes would release through curb drains to the street gutter. The detained flow would be conveyed to one of the three filtration units at the bend in the roadway where the stormwater would be treated prior to release into the culvert and the unnamed seasonal creek.

Lots 14 through 19: Stormwater detention pipes would be constructed on each lot. Each detention system would include a 36-inch diameter pipe that would be approximately 20 feet long, and would include a restrictor to control release of stormwater flows. The pipes would release through curb drains to the street gutter. The detained flow would be conveyed to two of the three

As shown in Table 2.1-1, the originally proposed Lot 6 is now proposed to be an open space easement at the rear of Lot 5.
filtration units at the bend in the roadway where the stormwater would be treated prior to release into the culvert and the unnamed seasonal creek. In addition, a cut-off swale would be constructed along the uphill portions of these lots toward the rear of the property these lots. This concrete-lined swale would intercept stormwater runoff from farther up the hillside. The cut-off swale would drain from east to west across these six lots to a storm drain drop inlet near the southwest corner of Lot 14. From that inlet, the stormwater would flow through a storm drain pipe along the western edge of Lot 14, and across Laurel Way to a stormwater catch basin. From there, the stormwater would enter the culvert and flow into the seasonal creek.

Construction Equipment and Grading Activities

The applicant anticipates that the overall construction period for the new street extension and related infrastructure would be approximately 6 to 9 months, including construction activities related to rough grading, retaining walls, the new roadway and sidewalks, and the installation of:

- Storm drainage and sanitary sewer lines
- Water facilities and services
- Electrical and gas utilities and services
- Communication
- Cable television (CATV)
- Street lights

Final erosion control and landscaping work would be accomplished upon completion of work associated with the utilities, fine grading, installation of concrete curb and gutter, sidewalk, asphalt paving, and striping for the street.

Access

Temporary access would be maintained on a daily basis for the two residences currently served by the unimproved portion of Laurel Way and in the area where construction work would be occurring. In addition, the contractor would be required to communicate with the neighbors regarding times of construction, and would be required to provide notice whenever there would be temporary impacts related to access and parking in the area.

Equipment and Earthwork

The construction equipment required for Phase I is shown in Table 2.4-2, while the quantities of earthwork and earth moving required in Phase I is shown in Table 2.4-3. Approximately 500 cubic yards of excess earth material would need to be hauled from the site during the 6 to 9 months of construction associated with the new street extension and related infrastructure. Based upon a capacity of 10 cubic yards per truck, the off haul would equate to a total of 50 truck trips, or approximately three truck trips per week during the construction period.

Worker Parking

Construction worker parking would be provided on the project site as much as possible so as to not disrupt existing neighborhood parking. In the event the number of construction vehicles exceeds the capacity of available parking on-site, the general site contractor would implement an on-site parking plan and shuttle construction workers from other locations.

Refueling and Repairs

All refueling of construction vehicles would be accomplished by specialized fueling and maintenance vehicles that would visit the site on an as-needed basis. All extensive repairs to
**Table 2.4-2: Construction Equipment Required for Phase I**

<table>
<thead>
<tr>
<th>Activity</th>
<th>Required Construction Equipment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Laurel Way Roadway Improvements – Rough Grading</td>
<td>• D-9 bulldozer</td>
</tr>
<tr>
<td></td>
<td>• Ripper</td>
</tr>
<tr>
<td></td>
<td>• Compactor</td>
</tr>
<tr>
<td></td>
<td>• Road grader (for road sub grade)</td>
</tr>
<tr>
<td></td>
<td>• Excavator (to rough grade other areas, including footings for the retaining wall structures)</td>
</tr>
<tr>
<td></td>
<td>• 10-wheel dump truck (to move material around the site)</td>
</tr>
<tr>
<td></td>
<td>• Water truck (to provide dust control on daily basis)</td>
</tr>
<tr>
<td>Utility Improvements</td>
<td>• Backhoe (for trenching)</td>
</tr>
<tr>
<td></td>
<td>• Wheel vibrator on a back hoe (for compacting trench backfilling)</td>
</tr>
<tr>
<td></td>
<td>• Multiple concrete trucks (for placing concrete structures)</td>
</tr>
<tr>
<td></td>
<td>• Multiple 10-wheel dump trucks (to bring trench backfill material to the site from off-site sources for utility trenches)</td>
</tr>
<tr>
<td></td>
<td>• Water truck (to provide dust control on daily basis)</td>
</tr>
<tr>
<td>Drainage Improvements</td>
<td>• Small excavator</td>
</tr>
<tr>
<td></td>
<td>• Loader (bobcat type)</td>
</tr>
<tr>
<td>Laurel Way Roadway Improvements – Final Grading and Paving</td>
<td>• Road grader and compactor (to prepare sub-grade for installation of curb and gutter, sidewalk, and final asphalt paving)</td>
</tr>
<tr>
<td></td>
<td>• Multiple concrete trucks</td>
</tr>
<tr>
<td></td>
<td>• Multiple 10-wheel dump trucks (to import aggregate base rock for installation and compaction for curb, gutter, and sidewalk prior to final asphalt paving activities, and to bring hot asphalt to the site for placement)</td>
</tr>
<tr>
<td></td>
<td>• Paving machine</td>
</tr>
<tr>
<td></td>
<td>• Water truck (to provide dust control on daily basis)</td>
</tr>
<tr>
<td>Landscaping</td>
<td>• Trucks (to deliver trees, shrubs, and soil amendments)</td>
</tr>
<tr>
<td></td>
<td>• General pick-up trucks (for delivery and installation of any irrigation and final erosion control materials)</td>
</tr>
</tbody>
</table>

**SOURCE:** Anticipated Sequencing for Subdivision Project-related Street Improvements, prepared by BKF Engineers, dated October 30, 2008.

**Table 2.4-3: Earthwork Quantities for Phase I**

<table>
<thead>
<tr>
<th>Description</th>
<th>Cut (CY)</th>
<th>Fill (CY)</th>
<th>Import (+)/Export (+) (CY)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Site/Roadway</td>
<td>2,550</td>
<td>2,850</td>
<td>-300</td>
</tr>
<tr>
<td>Stormwater Bio-Retention Basins</td>
<td>0</td>
<td>50</td>
<td>-50</td>
</tr>
<tr>
<td>Utility Trench Spoils</td>
<td>850</td>
<td>0</td>
<td>+850</td>
</tr>
<tr>
<td><strong>Subtotal</strong></td>
<td></td>
<td></td>
<td>+500 Export</td>
</tr>
</tbody>
</table>

**SOURCE:** Project plans prepared by BKF Engineers, dated October 28, 2008
construction equipment other than daily servicing would be performed at off-site facilities. All concrete wash-off areas utilized for subdivision project construction would be maintained and operated in accordance with Best Management Practices.

**Tree Removal and Landscaping Plan**

A total of 9490 trees with a trunk diameter of 12 inches or more would be removed as part of the project, with the remaining 889 existing mature trees being protected and maintained. An estimated 4647 trees would be removed as part of Phase I grading and construction activities, and 4543 trees would be removed as part of the construction of the 16 proposed residences in Phase II. The trees that would be removed in Phases I and II are listed in the arborist report provided by the applicant, and included in Appendix E. The project arborist has concluded that the majority of the trees to be removed are in fair to poor condition (Ralph Osterling, Inc. 2008). This report has been peer reviewed by the City Arborist.

The applicant proposes to plant a total of 100 new coast live oak (*Quercus agrifolia*) and valley oak (*Quercus lobata*) trees, and 28 western redbud (*Cercis occidentalis*) and vine maple (*Acer cincinnatum*) trees as replacement trees. The oak trees would be planted along the street frontage of each property, along the property lines dividing Lots 7 through 10, and along the rear property lines of Lots 9 through 13 in order to provide vegetative screening to the properties downhill from the project site. The western redbud and vine maple trees would be planted along the lower side of the retaining walls of the bio-retention basins on Lot 5 and Lots 7 through 10, as well as along the retaining wall for the vegetative swale on Lots 1 through 4. All of these trees would be planted at the conclusion of Phase I.

**2.4.3 PHASE II – RESIDENTIAL CONSTRUCTION**

Phase II construction activities would not begin until completion of all Phase I construction activities. Phase II of the project includes the construction of up to four (4) single-family residences per year. Phase I and II cannot exceed the five-year window within which to complete construction (i.e., if the Phase I construction takes one year, then Phase II construction will need to be completed within the remaining four years). In addition, no early stages of construction activities (such as tree removal or initial rough grading) would occur on any lot until a building permit is first obtained for the construction of a residence on the subject lot.

**Construction of Residences**

As stated previously, the sequencing and timing of the construction of the 16 proposed residences is unknown at this time. The 16 property owners each have separate goals and timelines for construction, and thus no exact timeline. The Zoning Ordinance provides for a five-year construction window for the project. The applicant anticipates that construction of the homes in-roadway, drainage, and utility improvements under Phase I would take approximately one year, and the construction of the 16 proposed residences under Phase II would take place during the remaining timeframe of the approved PD permit. Phase II was proposed. The applicant has submitted a draft Development Agreement (Appendix O) that would increase the construction window to eight (8) years, with an option for a one time, one year extension. The draft Development Agreement would also place limits on the maximum number of residences that could be under construction at one time. The draft Development Agreement would limit residential construction to no more than four residences in one year, with construction defined as grading, foundation, framing, and other exterior work. Interior and finishing work is exempt from this limitation. The new application places a limit on the maximum number of residences that could be under construction at one time. The new application limits residential construction to no more than four residences in one year, with construction defined as grading, foundation, framing, and other exterior work. Interior and finishing work would be exempt from this limitation. The draft Development Agreement would also allow for any unused construction slots in one year to carry over to the succeeding
years, provided that the total number of residences constructed in any two-year period not exceed six residences.

The analysis in this EIR assumes that the provisions of the draft Development Agreement are adopted for this project, such that construction of Phases I and II would be completed within an eight-five-year construction window, and no more than sixfour residences would be under construction during any two-each year period.

The 1816 parcels proposed for residential development range in size from 7,200 square feet to 13,20024,525 square feet (the largest lot on the site, Lot 6, is not proposed for residential development), with average slopes ranging from 19% to 41%. The proposed residences range in size from approximately 3,240600 square feet to approximately 5,4204,500 square feet, including garage, with an average proposed residence size of 3,837.5 square feet. Table 2.4-4 provides a list of the lot area, maximum building size, and maximum lot coverage by lot; the other proposed development regulations under the new PD are provided in Table 2.4-1.

Table 2.4-4: Proposed Residential Development Areas

<table>
<thead>
<tr>
<th>Lot #</th>
<th>Lot Area (sf)</th>
<th>Maximum Floor Area (sf)*</th>
<th>Maximum Floor Area (%)</th>
<th>Maximum Lot Coverage (sf)**</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>11,000-10,290</td>
<td>4,400-3,900</td>
<td>40%-37.9%</td>
<td>4,400-4,116</td>
</tr>
<tr>
<td>2</td>
<td>10,700-10,490</td>
<td>4,280-3,900</td>
<td>40%-37.2%</td>
<td>4,280-4,196</td>
</tr>
<tr>
<td>3</td>
<td>9,900-9,650</td>
<td>3,960-3,900</td>
<td>40%-40.4%</td>
<td>3,960-3,860</td>
</tr>
<tr>
<td>4</td>
<td>9,400-8,970</td>
<td>3,760-3,900</td>
<td>40%-43.5%</td>
<td>3,760-3,588</td>
</tr>
<tr>
<td>5</td>
<td>13,200-24,525</td>
<td>4,620-3,900</td>
<td>36%-15.9%</td>
<td>5,280-3,270</td>
</tr>
<tr>
<td>6***</td>
<td>14,200</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>7</td>
<td>10,800-10,460</td>
<td>4,860-4,500</td>
<td>45%-43.0%</td>
<td>4,320-4,184</td>
</tr>
<tr>
<td>8</td>
<td>8,300-8,665</td>
<td>3,735-3,500</td>
<td>45%-40.4%</td>
<td>3,320-3,466</td>
</tr>
<tr>
<td>9</td>
<td>10,100-10,640</td>
<td>4,545-4,500</td>
<td>45%-42.3%</td>
<td>4,040-4,256</td>
</tr>
<tr>
<td>10</td>
<td>12,800-13,450</td>
<td>5,120-4,500</td>
<td>40%-33.5%</td>
<td>5,120-5,380</td>
</tr>
<tr>
<td>11</td>
<td>7,200-7,510</td>
<td>5,240-3,300</td>
<td>45%-43.4%</td>
<td>2,880-3,044</td>
</tr>
<tr>
<td>12***</td>
<td>9,100</td>
<td>4,095</td>
<td>45%</td>
<td>3,640</td>
</tr>
<tr>
<td>13***</td>
<td>7,400</td>
<td>3,330</td>
<td>45%</td>
<td>2,960</td>
</tr>
<tr>
<td>14</td>
<td>7,400-7,750</td>
<td>3,330-3,600</td>
<td>45%-47.1%</td>
<td>2,960-3,060</td>
</tr>
<tr>
<td>15</td>
<td>7,600-7,985</td>
<td>3,420-3,600</td>
<td>45%-45.1%</td>
<td>3,040-3,194</td>
</tr>
<tr>
<td>16</td>
<td>7,900-8,375</td>
<td>3,555-3,600</td>
<td>45%-43.0%</td>
<td>3,160-3,350</td>
</tr>
<tr>
<td>17</td>
<td>8,200-8,545</td>
<td>3,690-3,600</td>
<td>45%-42.1%</td>
<td>3,280-3,418</td>
</tr>
<tr>
<td>18</td>
<td>7,700-8,015</td>
<td>3,466-3,600</td>
<td>45%-44.9%</td>
<td>3,080-3,206</td>
</tr>
<tr>
<td>19</td>
<td>8,800-8,685</td>
<td>3,960-3,600</td>
<td>45%-41.5%</td>
<td>3,520-3,474</td>
</tr>
</tbody>
</table>

Notes:
* The maximum floor area values include a two-car garage.
** Based on maximum lot coverage of 40 percent of the lot area.
*** As shown in Table 2.1-1, the originally proposed Lot 6 is now proposed to be an open space easement at the rear of Lot 5, and Lots 12 and 13 are no longer part of the proposed project.

Construction Equipment and Grading Activities

The applicant’s draft Development Agreement states that up to three-four residences would begin construction each year with a maximum of six residences under construction in any two-year period, and that the construction of all 18 residences would take up to eight years to complete. The number of new homes constructed each year would be dependent on the goals and actions of individual lot owners in the new subdivision. It is anticipated that the construction period for each new residence would be approximately 6 to 9 months and would include:

- Rough grading
- Foundation and retaining wall construction
- Framing
- Final landscaping installation
- Final utility service connections for storm drainage, sanitary sewer, water, electrical, telephone communications, and cable television services

Access

Access along Laurel Way would need to be maintained on a daily basis for all residences during construction periods. The contractor would be required to communicate with the neighbors regarding times of construction, and would be required to provide notice whenever there would be temporary impacts related to access and parking in the area.

Equipment and Earthwork

The construction equipment required for Phase II is shown in Table 2.4-5, while the quantities of earthwork and earth moving required in Phase II is shown in Table 2.4-6. Cut and fill activities would be balanced both on each lot and on the site as a whole as much as possible. Approximately 7,640 cubic yards of excess earth material would need to be off hauled from the site during construction of Phase II. Based on a capacity of 10 cubic yards per truck, the off site hauling of excess soils would require a total of approximately 764 truck trips, or approximately three truck trips per week during the construction period of Phase II.

Residential construction would require multiple subcontractors at different times during the life of the overall project. It would be each general contractor’s responsibility to meet all City of Redwood City requirements associated with building permits and/or maintenance of the construction site during the duration of the project.

Worker Parking

Construction worker parking would be provided on the project site as much as possible so as to not disrupt existing neighborhood parking. In the event the number of construction vehicles exceeds the capacity of available parking on-site, the general site contractor for each residential construction project would implement an off-site parking plan and shuttle construction workers from other locations.

Fueling and Repairs

All refueling of construction vehicles would be accomplished by specialized fueling and maintenance vehicles that would visit the site on an as-needed basis. All extensive repairs to construction equipment other than daily servicing would be performed at off-site facilities. All concrete wash-off areas utilized for project construction would be maintained and operated in accordance with Best Management Practices.
Tree Removal and Landscaping Plan

A total of 91 trees with a trunk diameter of 12 inches or more would be removed as part of the project, with an estimated 46 trees removed as part of Phase I grading and construction activities, and 45 trees removed as part of the construction of the 16 proposed residences in Phase II. The trees that would be removed in Phases I and II are listed in the arborist report provided by the applicant, and included in Appendix I.

All of the 128 replacement trees proposed by the applicant would be planted as part of Phase I. No additional trees or landscaping are proposed as part of Phase II. However, it is assumed that additional landscaping would be installed on each parcel as part of residential construction. No information about the number, size, species, or location of additional landscaping on each lot is available at this time. The PD application includes a statement regarding the applicant’s intention to use green building techniques, and specifically mentions the use of drought-tolerant, native vegetation for residential landscaping.

Table 2.4-5: Construction Equipment Required for Phase II

<table>
<thead>
<tr>
<th>Activity</th>
<th>Required Construction Equipment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Residential Construction – Rough Grading</td>
<td>• Rough grading (for the building pads)</td>
</tr>
<tr>
<td></td>
<td>• Excavator or back hoe</td>
</tr>
<tr>
<td></td>
<td>• Compactor (for fill placement)</td>
</tr>
<tr>
<td></td>
<td>• 10-wheel dump trucks (for export of excess earth material associated with excavation)</td>
</tr>
<tr>
<td></td>
<td>• Water truck (to provide dust control on daily basis)</td>
</tr>
<tr>
<td>Residential Construction – foundations, retaining walls, walkways, and driveways</td>
<td>• Multiple concrete trucks</td>
</tr>
<tr>
<td></td>
<td>• Concrete pumper</td>
</tr>
<tr>
<td></td>
<td>• Water truck (to provide dust control on daily basis)</td>
</tr>
<tr>
<td>Utility Connections</td>
<td>• Backhoe (for trenching)</td>
</tr>
<tr>
<td>Final Drainage Improvements and landscaping</td>
<td>• Small excavator</td>
</tr>
<tr>
<td></td>
<td>• Loader (bobcat type)</td>
</tr>
</tbody>
</table>

### Table 2.4-6: Earthwork Quantities for Phase II

<table>
<thead>
<tr>
<th>Description</th>
<th>Cut Cubic Yards (CY)</th>
<th>Fill (CY)</th>
<th>Import (-)/Export (+) (CY)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lot 1</td>
<td>230*</td>
<td>70</td>
<td>+160</td>
</tr>
<tr>
<td>Lot 2</td>
<td>225*</td>
<td>190</td>
<td>+35</td>
</tr>
<tr>
<td>Lot 3</td>
<td>130*</td>
<td>245</td>
<td>-115</td>
</tr>
<tr>
<td>Lot 4</td>
<td>215*</td>
<td>160</td>
<td>+55</td>
</tr>
<tr>
<td>Lot 5</td>
<td>90*</td>
<td>405</td>
<td>-315</td>
</tr>
<tr>
<td>Lot 6***</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Lot 7</td>
<td>195*</td>
<td>130</td>
<td>+65</td>
</tr>
<tr>
<td>Lot 8</td>
<td>85*</td>
<td>170</td>
<td>-85</td>
</tr>
<tr>
<td>Lot 9</td>
<td>70*</td>
<td>155</td>
<td>-85</td>
</tr>
<tr>
<td>Lot 10</td>
<td>100*</td>
<td>110</td>
<td>-10</td>
</tr>
<tr>
<td>Lot 11</td>
<td>765**</td>
<td>15</td>
<td>+750</td>
</tr>
<tr>
<td>Lot 12***</td>
<td>825**</td>
<td>15</td>
<td>+810</td>
</tr>
<tr>
<td>Lot 13***</td>
<td>855**</td>
<td>35</td>
<td>+820</td>
</tr>
<tr>
<td>Lot 14</td>
<td>1,260**</td>
<td>0</td>
<td>+1,260</td>
</tr>
<tr>
<td>Lot 15</td>
<td>1,015**</td>
<td>0</td>
<td>+1,015</td>
</tr>
<tr>
<td>Lot 16</td>
<td>1,070**</td>
<td>0</td>
<td>+1,070</td>
</tr>
<tr>
<td>Lot 17</td>
<td>515**</td>
<td>25</td>
<td>+490</td>
</tr>
<tr>
<td>Lot 18</td>
<td>785**</td>
<td>15</td>
<td>+770</td>
</tr>
<tr>
<td>Lot 19</td>
<td>965**</td>
<td>15</td>
<td>+950</td>
</tr>
<tr>
<td><strong>Subtotal</strong></td>
<td></td>
<td></td>
<td>+7,640 + 6,010 Export</td>
</tr>
</tbody>
</table>

**Notes:**

* Downhill lot grading numbers include foundation spoils (200 linear feet of perimeter foundation and/or piers, varies between 35 and 75 CY, average is 50 CY)

** Uphill lot grading numbers are based on grading associated with the excavation of a 16-foot-wide driveway and garage with the remainder of the residence stepped uphill with a stepped foundation and/or piers (varies between 515 and 1,260 CY)

*** As shown in Table 2.1-1, the originally proposed Lot 6 is now proposed to be an open space easement at the rear of Lot 5, and Lots 12 and 13 are no longer part of the proposed project.

**SOURCE:** Project plans prepared by BKF Engineers, dated October 28, 2008
2.5 Permits and Approvals

The permits listed below in Table 2.5-1 would be required for the construction of the homes and the infrastructure for the Laurel Way Development.

<table>
<thead>
<tr>
<th>Agency</th>
<th>Approval or Permit</th>
</tr>
</thead>
<tbody>
<tr>
<td>Federal</td>
<td></td>
</tr>
<tr>
<td>US Army Corps of Engineers (ACOE)</td>
<td>Section 404 permit for potential impacts to wetlands</td>
</tr>
<tr>
<td>US Fish and Wildlife Service (USFWS)</td>
<td>Consultation under Section 7 of the Endangered Species Act</td>
</tr>
<tr>
<td>State</td>
<td></td>
</tr>
<tr>
<td>California Department of Fish and Game (CDFG)</td>
<td>Streambed alteration permit; Incidental take permit</td>
</tr>
<tr>
<td>Regional</td>
<td></td>
</tr>
<tr>
<td>Regional Water Quality Control Board (RWQCB)</td>
<td>Issuance of National Pollutant Discharge Elimination (NPDES) Permits for construction and for stormwater treatment</td>
</tr>
<tr>
<td>Local</td>
<td></td>
</tr>
<tr>
<td>City of Redwood City Planning Commission</td>
<td>Approval of Planned Development zoning overlay permit and Tentative Parcel Map; review of CC&amp;Rs for the development</td>
</tr>
<tr>
<td>City of Redwood City Architecture and Review Committee Zoning Administrator</td>
<td>Approval of Planned Development Permit for the design review for each proposed residence</td>
</tr>
<tr>
<td>City of Redwood City Building Department Division</td>
<td>Approval of building and grading permits for construction</td>
</tr>
<tr>
<td>City of Redwood City Planning and Engineering Department Division</td>
<td>Review and approval of Tentative Parcel Map to merge three lots and create Lots 5 and 6, Lot 14A, Block 18, and to establish additional right-of-way dedications, easements for road widening, public ingress and egress, utility easements, emergency vehicle access, and public utility easements utilities for the Laurel Way extension; approval of permits for road, drainage, and utility improvements; approval of encroachments into the public right-of-way</td>
</tr>
<tr>
<td>City of Redwood City Fire Department</td>
<td>Review and approval of emergency access</td>
</tr>
<tr>
<td>Local utility companies</td>
<td>Connection permits for water, sewer, stormwater, gas, electricity, telephone, and cable</td>
</tr>
</tbody>
</table>

The permits listed below in Table 2.5-2 may potentially be required for the construction of the homes and the infrastructure for the Laurel Way Development.

<table>
<thead>
<tr>
<th>Agency</th>
<th>Approval or Permit</th>
</tr>
</thead>
<tbody>
<tr>
<td>Federal</td>
<td></td>
</tr>
<tr>
<td>US Army Corps of Engineers (ACOE)</td>
<td>Section 404 permit for potential impacts to wetlands</td>
</tr>
<tr>
<td>US Fish and Wildlife Service (USFWS)</td>
<td>Consultation under Section 7 of the Endangered Species Act</td>
</tr>
</tbody>
</table>
32: COMMENTS AND RESPONSES

32.1 Introduction

This section summarizes the public comments that were received during the Draft EIR comment period, and the City’s responses to these comments. Responses to comments were initially provided in the August 2010 Final EIR. The applicant has since submitted a new project application, so the responses to comments in this Revised Final EIR have been revised to reflect the new project description. Text added to this chapter is highlighted and underlined, and deleted text is highlighted and stricken.

32.1.1 COMMENTS RECEIVED

A total of 11 letters were received concerning the Draft Environmental Impact Report (Draft EIR) for the proposed Laurel Way Planned Development project. Letters were received from:

- The County of San Mateo, Department of Public Works
- The landowners’ representative and the project manager
- The landowners’ project engineer
- Eight individuals and neighbors, mostly residing in the project vicinity

Comments on the project were also presented at the April 6, 2010 Planning Commission public hearing.

32.1.2 RESPONSES

A list of all letters and comments on the Draft EIR is presented in Section 32.2 of this chapter. A summary of the text of each written and transcribed oral comments appear in Section 32.3.

32.1.3 TEXT REVISIONS

Responses to some comments include revisions to the text of the Draft EIR. Summaries of revisions to the text and/or graphics (tables and figures) of the Draft EIR are included in the response to comment where appropriate and necessary to clarify and further enhance the
3: COMMENTS AND RESPONSES

The adequacy and readability of the EIR. The page number of the text change refers to the page in the Draft EIR. The changes are included in Chapter 48: Errata, of this Final EIR.

32.2 List of Persons and Agencies Commenting

The comments received on the Draft EIR are listed by date in the order that they were received, and have been given a letter designation as listed below in Table 32.2-1.

<table>
<thead>
<tr>
<th>Comment Number</th>
<th>Commenter</th>
<th>Organization (If Applicable)</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>Michael Wenz</td>
<td>Individual</td>
<td>April 5, 2010</td>
</tr>
<tr>
<td>B</td>
<td>Roland Haga, P.E.</td>
<td>BKF Engineers (Project Engineer)</td>
<td>April 6, 2010</td>
</tr>
<tr>
<td>C</td>
<td>George Eshoo</td>
<td>Individual</td>
<td>April 6, 2010</td>
</tr>
<tr>
<td>D</td>
<td>Jon Bamford</td>
<td>Individual</td>
<td>April 6, 2010</td>
</tr>
<tr>
<td>E</td>
<td>Carrie Simon</td>
<td>Individual</td>
<td>April 6, 2010</td>
</tr>
<tr>
<td>F</td>
<td>Enrica Poggio</td>
<td>Individual</td>
<td>April 7, 2010</td>
</tr>
<tr>
<td>G</td>
<td>Mark Chow, P.E.</td>
<td>County of San Mateo, Department of Public Works</td>
<td>April 7, 2010</td>
</tr>
<tr>
<td>H</td>
<td>Elizabeth Bamford</td>
<td>Individual</td>
<td>April 7, 2010</td>
</tr>
<tr>
<td>I</td>
<td>Bruce Storms</td>
<td>Individual</td>
<td>April 7, 2010</td>
</tr>
<tr>
<td>J</td>
<td>Oded Haner, John Ward</td>
<td>Landowners’ Representative and Project Manager</td>
<td>April 7, 2010</td>
</tr>
<tr>
<td>K</td>
<td>Richard Guinon</td>
<td>Individual</td>
<td>April 8, 2010</td>
</tr>
<tr>
<td>L</td>
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32.3 Comments and Responses

The California Environmental Quality Act (CEQA) Guidelines indicate that the Final EIR should identify and provide responses to comments on the Draft EIR. This section presents responses to all of the comments on environmental issues received on the Draft EIR during the review period. Each comment letter received is recorded according to the numbering system identified previously. Each comment in each letter received has a number (A-1, A-2, B-1, etc.) assigned to it. The comment letters can be found in Appendix E of this Final EIR. Responses are provided to each written or oral comment on environmental issues. Where a response is provided in a Master Response or other prior response, the reader is referred to that response. Some comments, including those paragraphs not identified by a letter and a number, state the commenter’s opinions about the merits of the project, or restate facts about the project. These opinions are noted but do not receive specific responses. Responses are focused on the comments made on environmental issues.

This section presents the comments received and responses to comments on environmental issues raised regarding the environmental effects of the proposed project. Responses are generally not provided to comments that state opinions about the overall merit of the project or comments about the project description, unless a specific environmental issue is raised within the context of the specific comment. Commenters’ opinions are noted.
Changes to the Draft EIR, where deemed appropriate and necessary to clarify and further enhance the adequacy and readability of the EIR, are summarized in the responses and refer to the section or mitigation measure in which the text or figure appears in the Final EIR. The actual text changes are noted in the Final EIR in a strikethrough/underline format and included in Errata (Chapter 43 of this Final EIR). Revisions to figures are listed in Section 4.3.3.4 of this Final EIR.

3.3.1 LETTERS OF COMMENT AND RESPONSES

A Michael Wenz
3656 Jefferson Avenue
Redwood City, California 94062

Comment A-1: Commenter believes that Highland Avenue is an unsafe street due to lack of sidewalks, poor lighting, and poor visibility due to the winding nature of the road. The commenter believes that Highland Avenue cannot handle the additional traffic that would result from the project, and that this additional traffic would further degrade the safety of this street.

Response A-1: The EIR identifies the overall condition of Highland Avenue, including the narrowness and related physical constraints of the roadway in the vicinity of Laurel Way. Project construction could result in impacts to traffic safety due to the larger size of some construction vehicles and the narrow and winding nature of the roadway potentially resulting in temporary blockages of two-way traffic on Highland Avenue. Mitigation measure Traffic-1 would require the implementation of a Traffic Management Plan that would include a routing and staging plan for all construction vehicles. Mitigation measure Traffic-6 would require the use of flaggers on both Highland Avenue and Laurel Way to direct traffic during periods of high truck activity in order to reduce the potential for traffic accidents and ensure that construction vehicles do not inhibit traffic flows on either roadway. Implementation of these two mitigation measures would reduce construction impacts to traffic safety to a less than significant level.

Mitigation measure Traffic-5 includes the installation of a stop sign on Laurel Way at Highland Avenue to reduce safety impacts of vehicles entering Highland Avenue from Laurel Way to a less than significant level. The City is not requiring that the applicant mitigate the baseline conditions of Highland Avenue.

A complete traffic analysis has been performed for the project. This traffic analysis showed that construction traffic during Phases I and II could result in a significant traffic impact due to the increased traffic generated on Highland Avenue, particularly if all of the 16-18 proposed residences were built simultaneously. Mitigation measures Traffic-1 through Traffic-4 would reduce construction traffic impacts to a less than significant level by limiting construction hours, construction traffic hours, limiting the number of residences that could be under construction at one time, and requiring the preparation of a Traffic Management Plan. The traffic generated by the occupancy of the proposed 16-18 residences would not result in significant impacts to traffic, as the peak traffic flow generated by the residences would not exceed 5 percent of current traffic flows, and the four study intersections would continue to operate at LOS “D” or better.

The City does not feel that the narrowness and winding nature of Highland Avenue make it an unsafe street. While the street is narrow and winding in certain locations, it is relatively safe and is similar in character to other surrounding hillside streets. Like other similar hillside streets, the narrowness and curves can be negotiated with reasonable driving behavior and caution. Highland Avenue is a low-volume, local residential street that primarily serves the adjacent residences and can handle the small amount of additional traffic that would be generated by this project. If there are specific areas or locations of concern, or any specific traffic-calming measures that the residents would like to propose for Highland Avenue and that are supported by the majority of
residents, the City would be happy to review and evaluate them independent of the proposed project.

**Comment A-2:** Commenter states that the project site is one of the few areas of open space and natural setting in the area, and opposes conversion of dwindling open space to housing.

**Response A-2:** The comment is noted. The project site is private property that was subdivided into legal lots prior to the area’s incorporation into the City of Redwood City. The owners of the parcels in the project area have the right to develop their property within the laws, ordinances, and provisions of the City of Redwood City.

**B Roland Haga, P.E.**  
BKF Engineers (Applicant’s Engineer)  
255 Shoreline Drive, Suite 200  
Redwood City, California 94065

**Comment B-1:** The source of mitigation measures Hydrology-6 and Hydrology-7 is unclear, since they do not appear in the City of Redwood City Engineering Design Standards regarding Storm Water Drainage Hydrology and Hydraulic Calculations.

**Response B-1:** These two mitigation measures were developed by the EIR team hydrologists to mitigate potential increases in post-construction stormwater runoff.

**Comment B-2:** The intent of mitigation measure Hydrology-7 is unclear, as it can be interpreted to require a 95 percent reduction in peak stormwater discharge compared to current discharge levels, or to require that post construction peak stormwater discharge to not exceed 105 percent of pre-construction peak discharge.

**Response B-2:** The text of mitigation measure Hydrology-7 has been modified to make the intent of the measure clear. The intent of this mitigation measure is to ensure that post-construction peak stormwater discharge does not exceed 105 percent of pre-construction peak discharge.

**C George Eshoo**  
Law Offices of George Eshoo  
702 Marshall Street, Suite 500  
Redwood City, California 94063

**Comment C-1:** Commenter states that his client owns the access rights in front of her property on Laurel Way, and that the EIR inadequately addresses permission for access to the project site and permission to widen the roadway.

**Response to Comment C-1:** Laurel Way is a private roadway. Laurel Way was created as a private roadway in 1926, and Laurel Way and other portions of the surrounding neighborhood were annexed into the City in 1969. Although Laurel Way itself was never accepted as a public street by the City, legal access to the undeveloped properties has existed and has been documented through various title reports describing legal right-of-way access for the development of three properties on Laurel Way. The City has found no evidence that permission has been required from existing private property owners for legal access to any of the three developed lots on record. Records indicate that the owners of developed parcels have separate maintenance agreements for the upkeep of the roadway. The City believes that this issue is a private matter between the property owners involved, and that this access issue would need to be resolved prior to the issuance of building permits.
**Comment C-2:** Commenter believes that the Draft EIR does not address the potential environmental impacts to the neighboring properties in the area, and specifically states that the Draft EIR indicates the removal of 91 existing trees as a positive environmental impact when it should be described as a negative environmental impact.

**Response C-2:** The Draft EIR analyzes potential impacts to the surrounding neighborhood on issues relating to aesthetics, air quality, biological resources, cultural resources, geology, hazards and hazardous materials, hydrology and water quality, land use and planning, recreational resources, agricultural resources, noise, population and housing, public services and utilities, transportation and traffic, and greenhouse gases. The Draft EIR concludes for each of these environmental issue categories that all potentially significant impacts would be reduced to a less than significant level with the implementation of the identified mitigation measures.

The Draft EIR indicates that 90 trees would be removed as part of the project, with the removal of 47 trees required to accommodate the roadway, drainage, and infrastructure improvements proposed in Phase I, and 43 additional tree removals for the construction of the 16 residences in Phase II. The Draft EIR does not indicate that the removal of these existing trees would be a positive environmental impact. The arborist report included as Appendix E in the Draft EIR and peer reviewed by the City indicates that the majority of the trees proposed for removal are in fair to poor condition. Mitigation measures Aesthetics-1, Aesthetics-3, Aesthetics-4, and Biology-3 all include measures for protecting and preserving the remaining trees on the site and requiring adequate replacement to mitigate the loss of the existing mature trees.

**Jon Bamford**

**Comment D-1:** Commenter states that the majority of the concerns expressed at the April 6, 2010 Planning Commission public hearing on the Laurel Way project focused on issues regarding public safety and preservation of the quality of life in the neighborhood. The commenter believes that it is the responsibility of the EIR to address these issues, and that it is the responsibility of the Planning Commission to consider these issues when making a decision regarding the Laurel Way project.

**Response D-1:** The comment is noted. Public safety is addressed in the Traffic and Transportation section. The quality of life is not a topic for CEQA review but may be considered by the Planning Commission.

**Comment D-2:** Commenter states that the subject lots require a Planned Development (PD) permit in order to be developed. The commenter believes that the Draft EIR contradicts this requirement by stating that the lots could potentially be developed individually (as outlined in Table 5.3-2) if the No Project Alternative is chosen by the Planning Commission. The commenter believes that the No Project Alternative can only result in no development on the project site.

**Response D-2:** The majority of the subject lots have an average slope that exceeds 30 percent, and therefore these lots are required to obtain a PD permit prior to development. The exceptions are Lots 9, 11, and 12, which have an average slope less than 30 percent and therefore do not require PD permit approval for development.

If the Planning Commission elects to approve the No Project Alternative, then one of two options may result from that decision. The first option is that the subject property is not developed and the status quo is maintained. The second option is that the various owners of the subject lots may decide to apply individually to develop their lots, with a majority of the lots requiring Planning Commission approval of a PD permit (the one exception being Lot 9, which with a lot area of 10,100 square feet and an average slope of 29 percent is considered a conforming lot to the R-H zoning regulations). The maximum potential floor area limits under the No Project Alternative (as outlined in Table 5.3-2 of the Draft EIR) were determined based on the requirements of Article 32.2
3: COMMENTS AND RESPONSES

of the Redwood City Municipal Code. The R-H zoning district allows for a maximum lot coverage of 40 percent and up to 2.5 stories of development. The maximum floor area limits shown in Table 5.3-2 assume that each residence would be a two-story home with a 40 percent lot coverage, for a maximum floor area limit of 80 percent. The commenter is correct that the approval of those lots that exceed 30 percent average slope would require approval of a PD permit by the Planning Commission; that does not change the fact that any of the property owners could apply for approval of a residence of the size described in the Table 5.3-2 of the Draft EIR.

Comment D-3: Commenter provides quotations from Article 46 of the Redwood City Municipal Code regarding Planned Development permits.

Response D-3: The language quoted by the commenter accurately reflects the language in Article 46.

Comment D-4: Commenter provides quotations from Section 46.7 of the Redwood City Municipal Code regarding Planned Development permits. The quotations state that the PD process allows modifications of and relief from various zoning district requirements, such as maximum building size, but do not allow for an increase in the number of residential units that would be allowed by the underlying zoning district designation. The commenter believes that the current PD permit application violates this requirement by proposing more residences than would be allowed under the existing zoning regulations.

Response D-4: The subject parcels are zoned Residential Hillside (R-H), which allows for one residence per parcel. The project site is currently composed of 18-20 parcels, which would allow for up to 18-20 residences to be built on the site under R-H regulations. The applicant proposes to perform lot line adjustments to reduce the total number of parcels to 19, and to keep one of these 19 lots as open space. The applicant is proposing to construct one residence on each of the remaining 18 lots for a total of 18 residences. The proposal therefore conforms to the maximum number of residential units allowed under the R-H zoning regulations, and the PD permit request would be consistent with the provisions of Article 46.7.

Comment D-5: Commenter believes that the Draft EIR does not address the potential drainage and erosion impacts of the proposed project on the portion of the unnamed drainage channel between the northeast corner of the project site and the culvert under Glenwood Avenue. Specific concerns include bank erosion from the proposed lateral spreaders, modifications to site drainage, increased impermeable surfaces, and increases in stormwater volume.

Response D-5: The proposed drainage improvements are intended to collect and control the release of stormwater runoff, and reduce the force of runoff as it enters the drainage channel on the project site. Mitigation measure Hydrology-7 requires that peak stormwater discharge not exceed 105 percent of pre-construction peak discharge. Increased impermeable surface and changes to drainage patterns on the site may result in a net increase in stormwater drainage from the site, but the proposed drainage improvements are intended to capture and release this stormwater flow over a longer period of time. Therefore, post construction peak stormwater flows would not increase over existing peak discharge levels by more than 5 percent, resulting in less than significant drainage and erosion impacts to the portion of the drainage channel downstream of the project site.

Comment D-6: It is unclear in the text of the Draft EIR whether the project will be required to comply with the provisions of the San Francisco Bay Regional Water Quality Control Board (RWQCB) 2007 amendments to the 2003 revisions to Order 99-059.

Response D-6: The project would be required to comply with all requirements of the RWQCB in regard National Pollutant Discharge Elimination System (NPDES) standards and requirements as outlined in mitigation measure Hydrology-2 on page 3.7-11 of the Draft EIR.
Comment D-7: Commenter believes that the shadow study included in the Draft EIR is incomplete, and that a time lapse study including more hours in the day is required in order to make a determination regarding the significance of shadow impacts on downhill neighbors. The commenter believes that the shadow casting impacts would be significant, and that mitigation measures involving reduced building sizes and reduced building height should be considered.

Response D-7: Please see the response to Comment L-32.

Comment D-8: Commenter believes that the noise study included in the Draft EIR does not adequately address the acoustics of the hillside, which the commenter states allows for noise to travel farther than it would otherwise.

Response D-8: The noise impact analysis is based on the noise technical report included as document 21 in Appendix E of the Draft EIR. The noise analysis addresses the topography effects of noise in the area on pages 12 and 13. The noise technical report indicates that where views of the project site are unobstructed, noise from the project site would require a longer distance to attenuate. The Draft EIR states that construction noise could result in a potentially significant noise impact, and that mitigation measures Noise-1 through Noise-4 and mitigation measure Traffic-4 would reduce the construction noise impacts to a less than significant level. The Draft EIR also concludes that the noise from occupancy of the proposed residences would be in keeping with the ambient noise levels in the neighborhood, and would represent a less than significant impact with no mitigation required.

Comment D-9: Commenter believes that the Draft EIR does not adequately address the potential impacts of landslides, particularly during the up to nine years of project construction when portions of the hillside would be exposed to increased erosive forces.

Response D-9: The project would be required to adhere to all City of Redwood City Building and Engineering Division requirements for construction, as well as comply with all mitigation measures in the Draft EIR. Specifically, mitigation measure Hydrology-1 (page 3.7-10 of the Draft EIR) requires preparation of a detailed Erosion Control Plan (ECP) that would address erosion issues related to project construction. Mitigation measure Hydrology-2 contains erosion control and stormwater treatment measures that include monitoring the project’s performance and compliance with these measures post construction. Mitigation measure Geology-1 would require that all recommendations from the geotechnical feasibility report be implemented to the extent feasible. Mitigation measure Geology-2 would require that a design-level geotechnical evaluation be prepared for the roadway and infrastructure improvements, and for each residence, and that the recommendations of these investigations be implemented to the extent feasible. These mitigation measures were developed from the geotechnical reports and storm drainage studies that were developed and peer reviewed as part of this project, and included in Appendix E of the Draft EIR. Implementation of these mitigation measures would reduce the potential erosion impacts, including landslide risk, to a less than significant level. The new project application reduces the total construction period to no more than five years.

Comment D-10: Commenter inquires as to the timing of the various reports required by the mitigation measures outlined in the Draft EIR, and inquires whether these reports would be included in the Final EIR prior to the Planning Commission’s decision regarding the Laurel Way project.

Response D-10: The various plans and reports listed in the commenter’s letter would all need to be submitted for the City’s review and approval prior to commencement of construction activities. None of these plans and reports are included in the Final EIR, nor will the plans and reports be available for review prior to the Planning Commission’s decision on the Laurel Way project. All of the plans and reports identified in the mitigation measures require that design-level engineering be
performed for the project, which would not occur until after the CEQA review process and the Planning Commission decision on the project.

E  Carrie Simon
    Co-owner of 711 Vista Drive
    Redwood City, California 94062

Comment E-1: Commenter provides a summary of the history of the subject property and its current ownership and zoning designation.

Response E-1: The commenter’s statements are factually accurate.

Comment E-2: Commenter summarizes the history of the current application and provides a brief description of the project.

Response E-2: The commenter’s statements are correct, with the exception that the proposed roadway would be physically divided only along one portion of the roadway in order to accommodate the steep topography, and would not otherwise be divided.

Comment E-3: Commenter expresses general concerns about the overall impacts of the project and the inadequacy of the mitigation measures proposed to address them.

Response E-3: The comment is noted.

Comment E-4: Commenter expresses concern regarding the removal of approximately half of the mature trees on the site, and believes that the use of small replacement trees is inadequate mitigation, particularly considering that with the construction of the roadway, infrastructure improvements, and 18 new residences, there would be less space in which to plant these replacement trees. The commenter is also concerned that the replacement trees would take many years to grow to maturity and begin to replace the mature canopy and habitat provided by the existing trees. The commenter also states that the removal of these trees would be inconsistent with the spirit, if not the letter, of the City’s tree preservation policies.

Response E-4: Please see the response to Comment L-2. The removal and replacement of trees as part of project would be performed in accordance with the City’s Tree Preservation Ordinance. The applicant would be required to submit a detailed landscaping plan as part of mitigation measure Aesthetics-1 for the review and approval of the Planning Division and the City Arborist. The specific location, size, and species of trees to be planted would be determined as part of the City’s review of this landscaping plan.

Comment E-5: Commenter notes that the Draft EIR indicates that the proposed 18 new residences would be larger than the average residence size in the neighborhood. The commenter expresses doubt that any amount of vegetation would be adequate to screen large residences from view.

Response E-5: Mitigation measures Aesthetics-1, Aesthetics-3, and Aesthetics-4 all require submittal of a landscaping plan in order to provide screening to the roadway and infrastructure improvements, new residences, and new sources of nighttime lighting. A separate landscaping plan would be prepared by the applicant and reviewed by the City prior to building permit issuance for each residence. The landscaping plan for each proposed residence would be reviewed based on the physical characteristics and topography of the subject lot and proposed placement of the residence. The intent of this mitigation is to utilize landscaping elements to address the impact of bulk of the residences as viewed from nearby properties, but not to completely screen them from view.
Comment E-6: Commenter states that the air quality analysis in the Draft EIR inadequately addresses air pollution emissions during the extended construction period, as well as the air emissions from the proposed 18 new residences. The commenter believes that adherence to air quality regulations and best management practices is insufficient to address air quality impacts.

Response E-6: The air quality analysis in the Draft EIR analyzes both construction emissions and emissions from the occupancy of the proposed 18 residences. Mitigation measure Traffic-4 places a limitation on the number of residences that can be under construction at one time, which in turn places a cap on the amount of air pollution emissions that could be expected at any one time. The analysis in the Draft EIR concludes that construction emissions would remain below all federal, state, and local agency thresholds of significance for air pollutants, and that the project would have a less than significant impact on air quality. The Draft EIR also presents an analysis of the air quality impacts from the addition of residential vehicular trips utilizing Bay Area Air Quality Management District (BAAQMD) thresholds of significance and determined that the addition of residential vehicular trips would have a less than significant impact on air quality (page 3.2-8 of the Draft EIR). Recommended measure Air Quality-1 has been included in the Draft EIR to further reduce the already less than significant air quality impacts of the project. Please also see the response to Comment K-7.

Comment E-7: Commenter notes the scale and scope of the proposed mitigation monitoring that would be required for the project, and questions whether the resources required for such monitoring make these mitigation measures infeasible.

Response E-7: A Mitigation Monitoring and Reporting Program (MMRP) will be included with the Revised Final EIR (as Appendix A) and considered by the Planning Commission as part of its review of the project. The MMRP allows the City to track all of the mitigation measures included with the project, and ensure that all mitigation measures are implemented and monitored so that all project impacts remain at a less than significant level. The MMRP has been reviewed by City staff as part of the Revised Final EIR process to ensure that the mitigation measures proposed in the Draft EIR can be implemented and monitored. The applicant would be required to compensate the City for the time and resources required to review and implement the MMRP.

Comment E-8: Commenter notes that the Draft EIR states that the unnamed drainage channel could be affected by the project, but that Best Management Practices (BMPs) would be implemented to reduce and mitigate the effects of erosion on the drainage channel. Commenter believes that the Draft EIR does not state whether these BMPs would be sufficient to mitigate erosion impacts on the drainage channel.

Response E-8: Potential impact 3.7-1 (pages 3.7-10 through 3.7-13) specifically addresses erosion and siltation impacts to the unnamed drainage channel. Mitigation measures Hydrology-1 through Hydrology-3 all include incorporation of BMPs to reduce erosion and siltation impacts. Mitigation measures Hydrology-1 and Hydrology-2 would reduce construction erosion and siltation impacts to a less than significant level, and mitigation measures Hydrology-3 and Hydrology-4 would reduce post construction erosion and siltation impacts to a less than significant level.

Comment E-9: Commenter believes that the proposed greenbelts would be inadequate to accommodate the wildlife that currently use the area, and that wildlife would simply be displaced by the project.

Response E-9: The project has been designed to provide conservation easements, including the entire area of Lot 6, to ensure the continued ability of wildlife to pass through the site. The proposed easements would be located in the rear sections of lots 1-4, 9-10, and 14-19, and would maintain the natural appearance and vegetation of the area. No structures or fencing would be allowed within these easement areas, thereby allowing a substantial area for wildlife movement,
and reducing the potential impacts to the movement of wildlife to a less than significant level, as stated on page 3.3-19 of the Draft EIR.

Comment E-10: Commenter believes that the area remaining on the site for the planting of replacement trees may be too limited, and that these trees would take too long to mature.

Response E-10: The siting of replacement trees would be a component of the landscape plans required as part of mitigation measures Aesthetic-1, Aesthetics-3, and Aesthetics-4. These landscaping plans would be submitted for the review and approval of the Planning Division and the City Arborist. The specific locations on each lot for the planting of replacement trees would take into account aesthetic concerns as well as soil retention, natural light, and related lot-specific environmental factors. Please also see response to Comment L-2.

Comment E-11: Commenter believes that the proposed site grading and earth moving activities would destabilize the hillside and endanger the two existing residences on the unimproved portion of Laurel Way. Commenter believes that the Draft EIR does not adequately address hillside destabilization, and that it is premature to state that compliance with future geotechnical investigation reports would reduce the risk of landslides and erosion to a less than significant level.

Response E-11: The project would be required to adhere to all City of Redwood City Building and Engineering Division requirements for construction, as well as comply with all mitigation measures in the Draft EIR, which include complying with all recommended measures in the geotechnical feasibility report that was prepared and peer reviewed for this project. Specifically, mitigation measure Geology-2 requires preparation of a design-level geotechnical investigation for the proposed roadway and utility improvements, as well as for each lot proposed for development. All recommendations of these geotechnical reports would be implemented to the extent feasible, reducing landslide and soil creep impacts to a less than significant level. These design-level geotechnical investigations cannot be performed until the design-level engineering has been performed for the Phase I improvements and for each residence proposed under Phase II. It is standard practice for an applicant to submit a conceptual plan for review and approval under CEQA, and then perform the design-level engineering for a project for a detailed design-level geotechnical review and analysis.

Comment E-12: Commenter is concerned that the safety plans and fuel management plans would be insufficient to address potential fire hazards. Commenter states that the subject area’s designation as a “Wildlands Urban Interface Fire Area” mandates special provisions, such as ignition-resistant construction and defensible space around homes.

Response E-12: The applicant has submitted a Fuel Management Plan to reduce fire risks during both construction and occupation of the proposed residences. This plan addresses both vegetation management on the lots as well as ignition-resistant buildings design, construction, and maintenance practices. The plan also establishes Fuel Management Zones and performance standards for each zone in accordance with mitigation measure Hazard-5. The plan also includes consideration of defensible space around residences when designing the landscape plans required as part of mitigation measures Aesthetics-1, Aesthetics-3, and Aesthetics-4. The City has reviewed the Fuel Management Plan submitted by the applicant and determined that this plan does comply with all requirements of the Wildlands Urban Interface Fire Area.

Comment E-13: Commenter notes that the project would result in increased impermeable surfaces, which would result in an increased volume of stormwater runoff and the potential for increased flooding impacts, as well as reduce the quality of stormwater runoff. Commenter believes that addressing flooding impacts and water quality impacts after they occur is inadequate.

Response E-13: The proposed drainage improvements and mitigation measures listed in Section 3.7, Hydrology and Water Quality are intended to reduce flooding and water quality
impacts to a less than significant level before a flooding or water quality impact occurs, not after. The increase in impermeable surfaces on the site would result in a likely increase in the overall volume of stormwater runoff released to the unnamed drainage channel. However, the proposed drainage improvements are intended to capture and release this stormwater flow over a longer period of time in order to reduce the volume of peak flows. In addition, mitigation measures Hydrology-7 includes a requirement that post construction stormwater peak discharge shall not increase by more than 5 percent over existing peak discharge.

Comment E-14: Commenter is concerned that the potentially significant noise impacts of project construction could last for up to nine years.

Response E-14: Please see the response to Comment K-7. The new project application reduces the total construction period to no more than five years.

Comment E-15: Commenter believes that the size of the project and its potential impacts would displace adjacent residents, and that the proposed widening of Laurel Way would displace the private property of existing residents.

Response E-15: Laurel Way is a private roadway and would remain a private roadway as part of the project. The proposed roadway widening would occur within the existing road right-of-way for the currently paved portion of Laurel Way and would not require additional dedication of private property for improvements to the roadway. The Draft EIR concludes that all of the project’s potentially significant environmental impacts can be mitigated to a less than significant level. No existing residents would be displaced by project construction or occupation of the proposed 18 new residences.

Comment E-16: Commenter believes that the proposed development would have no public benefit, and that the road would be private.

Response E-16: The comment is noted.

Comment E-17: Commenter disagrees that the project would result in less than significant impacts in regard to water supply, wastewater treatment, solid waste disposal, or the needs for other governmental services. Commenter also believes that the cost for mitigation monitoring during construction would be a drain on City resources.

Response E-17: In regard to each public service and utility discussed in Section 3.11 of the Draft EIR, a representative of each service or utility was contacted to confirm their capability to provide services to this project, or documents produced by each service or utility were consulted in order to confirm ability to provide service. All of the service and utility providers discussed in the Draft EIR have the capacity to serve the 18 proposed new residences through construction and occupancy.

CEQA requires that the costs for implementing and monitoring mitigation measures be borne by the project proponent and not by the parties affected by the project. Therefore, the applicant shall be required to bear the costs of mitigation measure implementation and monitoring, including covering the costs of mitigation monitoring to be performed by City staff.

Comment E-18: Commenter is concerned that the proposed traffic increase at the intersection of Laurel Way and Highland Avenue is characterized as "not significant". The commenter also notes a pedestrian fatality on Jefferson Avenue approaching Highland Avenue some years ago, and finds the public safety considerations along Highland not properly addressed. The commenter believes that Highland Avenue is in poor condition and was not intended to carry so much vehicular traffic.

Response E-18: The traffic analysis included in the Draft EIR analyzed the traffic volumes that would be generated by the project using the thresholds of significance established in the Redwood
City General Plan, and concluded that the project’s additional vehicular trips would result in a less than significant impact to traffic and traffic safety.

City staff examined traffic safety data along Highland Avenue between Laurel Way and Jefferson Avenue over a five-year period beginning in 2004. The data gathered by staff are presented in the Draft EIR on pages 3.12-3 and 3.12-4. This data review did not include review of prior accidents on Jefferson Avenue, as this is a collector street incorporating traffic from sources well beyond the project site and its vicinity. Additional traffic safety data are included in the response to Comment L-47.

The Draft EIR discusses the current physical condition of Highland Avenue and Laurel Way, including the current lack of stop controls at the Laurel Way/Highland Avenue intersection. Mitigation measure Traffic-5 includes installation of a stop sign and painted stop bar on Laurel Way at Highland Avenue, which would address traffic safety impacts for vehicles entering Highland Avenue from Laurel Way. Please also see response to Comment A-1.

**Comment E-19:** Commenter disagrees with the conclusion in the Draft EIR that all of the project’s potentially significant impacts can be mitigated to a less than significant level. The commenter believes that the Draft EIR understates the magnitude of the project’s impacts, and that the Planning Commission should deny the project.

**Response E-19:** The comment is noted.

**Comment E-20:** Commenter requests clarification of whether any of the proposed lots have an RH-10 zoning designation, and whether such a zoning designation would alter the minimum building site area for those lots.

**Response E-20:** All subject lots are currently zoned Residential Hillside (R-H). The minimum lot size requirement for a property zoned RH-10 is 10,000 square feet. If the subject lots were rezoned to RH-10, most of the lots would still be considered non-conforming in regard to lot size, and all of the lots would still require approval of a Planned Development permit in order to be developed due to the steepness of the average lot slopes. The allowable buildable floor area for each lot would still be determined by a Planned Development permit under RH-10 zoning.

**Comment E-21:** Commenter inquires whether the proposed Laurel Way roadway widening would require use of the property of existing Laurel Way landowners and residents.

**Response E-21:** The current property owners along Laurel Way already have dedications for right-of-way purposes along this roadway as part of their properties. Construction of Laurel Way to serve the project will include work within these existing rights-of-way but will not include additional land or right-of-way dedications from existing Laurel Way residents. Please also see the response to Comment E-15.

**F Enrica Poggio**  
3709 Laurel Way  
Redwood City, California 94062

**Comment F-1:** Commenter believes that the project would drastically change the character of the area, moving mature trees and replacing them with retaining walls and residences that are substantially larger than the existing homes in the neighborhood.

**Response F-1:** The comment is noted.

**Comment F-2:** Commenter believes that the soil of the hillside is fragile and weak, and is held together by the existing trees on the site. Commenter asks whether the City is legally liable if residences collapse in the event of an earthquake.
Response F-2: The project would be required to adhere to all City of Redwood City Building and Engineering Division requirements for construction, as well as comply with all mitigation measures in the Draft EIR. Specifically, mitigation measure Geology-1 (page 3.5-11) addresses issues related to seismic impacts, and reduces earthquake and other seismic impacts to a less than significant level. Liability issues are outside the scope of CEQA, and are not addressed in this Final EIR.

Comment F-3: Commenter believes that the slope on the project site is steeper than indicated in the Draft EIR.

Response F-3: The City of Redwood City’s slope-density formula was used to calculate the average slope on each of the subject lots, as per Section 23.2 of the City Ordinances.

Comment F-4: Commenter states that the rural, narrow, and winding natures of Laurel Way, Highland Avenue, and Altamont Street are not suitable for construction vehicles or the additional traffic that would result from the occupancy of the proposed 18 new residences. Commenter states that Laurel Way is a one-way street.

Response F-4: The traffic analyses performed for this project and included in Appendix E of the Draft EIR conclude that the additional traffic that would result from the proposed construction activities and the occupancy of the 18 new residences would not have a significant impact on traffic in the area. Mitigation measure Traffic-1 requires that the applicant prepare a Traffic Management Plan to address construction routing, staging, parking, and access. Mitigation measure Traffic-2 would place limits on the hours of construction traffic. Mitigation measure Traffic-6 would require the use of flag persons throughout all phases of construction to maintain safe and unobstructed movement along the designated truck route. These mitigation measures would reduce construction traffic safety impacts to a less than significant level.

Laurel Way is not a one-way street. Laurel Way is a dead-end street, and therefore requires that traffic move in both directions. The proposed roadway improvements would widen the currently unimproved portion of Laurel Way to improve the safety of such two-way traffic.

Comment F-5: Commenter inquires whether the City wants to transform this wooded area into a cemented hill.

Response F-5: The comment is noted.

Mark Chow, P.E.
County of San Mateo, Department of Public Works
555 County Center, 5th Floor
Redwood City, California 94063

Comment G-1: Commenter notes that 10 of the proposed 18 new residences are proposed to connect to a sanitary sewer main owned and maintained by the Emerald Lake Heights Sewer Maintenance District (District), and that the 10 parcels in question are currently outside the boundaries of the District and must be annexed prior to connection to District mains. Commenter further notes that any work on District facilities and new connections will require approval of the Director of Public Works for San Mateo County.

Response G-1: Comment noted. The applicant has been informed of the District’s requirements. The applicant’s engineer completed the study of the capacity of the sewer pipelines and found that they have adequate capacity (see Appendix B), and new text and a new mitigation measure, Public Services and Utilities-1, has been added to Section 3.11, Public Services and Utilities of the EIR (see Section 4.2 3.4 below). The new mitigation measure Public Services and Utilities-1 is also presented below:
Mitigation Measure Public Services and Utilities-1: The applicant shall prepare a sewer main capacity analysis for the review and approval of the Emerald Lake Heights Sewer Maintenance District for the 10 new residences proposed to connect to the District’s sanitary sewer mains. This sewer analysis will evaluate the condition of the existing sewer lines and their capacity to accept the additional flow that would be generated by the new residences. The applicant shall also apply for and obtain annexation to the District prior to approval of any new sewer connections with the District. These new sewer connections must be approved and constructed prior to issuance of building permits for any of the 10 new residences that would be located within the Emerald Lake Heights Sewer Maintenance District.

Comment G-2: Commenter requests an analysis of District sewer main capacity to determine if the County’s system can accommodate the proposed additional 10 residences.

Response G-2: Comment noted. The applicant has been informed of the District’s requirements, and new text and a new mitigation measure Public Services and Utilities-1 has been added to Section 3.11, Public Services and Utilities of the EIR (see Section 3.4 below). In addition, the applicant has submitted a preliminary evaluation of the main sewer line that has been included as Appendix B to this Revised Final EIR.

Comment G-3: Commenter questions the use of 200 gallons per day (gpd) per household as the average wastewater flow rate, as the District uses a generation rate of 220 gpd.

Response G-3: The value of 200 gpd per household reflects City of Redwood City standards, which include requirements for low flow toilets and other water saving devices and measures.

Comment G-4: Commenter notes that the District would consider dedicating the sewer mains shown on an attached figure to the City for ownership and maintenance as an alternative to annexing the 10 parcels to the District.

Response G-4: The City of Redwood City will not consider accepting such a dedication at this time.

Comment G-5: Commenter requests a copy of the Revised Final EIR once it has been released to the public.

Response G-5: Commenter has been added to the distribution list for the Revised Final EIR.

H Elizabeth Bamford

Comment H-1: Commenter is concerned about the effects of increased stormwater flow volumes in the portion of the unnamed drainage channel downstream of the project site before the culvert at Glenwood Avenue, and on the stability of both the channel banks and the adjacent homes.

Response H-1: Please see response to Comment D-5.

Comment H-2: Commenter is concerned that all of the stormwater drainage from the site would be directed into the drainage channel as part of this project, whereas some of the stormwater currently flows down the face of the hillside and joins the drainage channel further downstream of the site.

Response H-2: The proposed drainage system would capture a portion of the stormwater drainage that currently sheet flows down the hillside, and would redirect this stormwater into the drainage channel. The increased amount of impermeable surface on the project site would also increase the overall volume of stormwater that flows from the site. This increase in stormwater volume would be mitigated by the proposed bioretention basins and other drainage improvements on site that would capture the stormwater and release it into the drainage channel over a longer
period of time, and percolate a portion of the stormwater into the ground on the site. While the overall volume of stormwater leaving the project site may increase, the peak discharge into the channel would not increase by more than 5 percent over the current peak discharge, as required in mitigation measure Hydrology-7.

Comment H-3: Commenter believes that the Draft EIR fails to demonstrate that landslide risks would be reduced to a less than significant level, and that too many unknowns remain to be able to judge whether the hillside can support the construction and occupancy of the proposed project.

Response H-3: Please see the response to Comment E-11.

Comment H-4: Commenter agrees with comments made at the April 6, 2010 Planning Commission public hearing about the inaccurate or incomplete description of the No Project Alternative in the Draft EIR.

Response H-4: Please see the response to Comment L-18.

Bruce Storms
3618 Highland Avenue
Redwood City, California 94062

Comment I-1: Commenter believes that all construction traffic should be routed to and from the site using the southern portion of Highland Avenue, and that the more densely populated, narrow, and heavily winding northern portion of Highland Avenue should be avoided.

Response I-1: The comment is noted. The applicant would be required to develop a construction traffic routing plan as part of the Traffic Management Plan required in mitigation measure Traffic-1. The Traffic Management Plan would be submitted for the review and approval of the City, and factors such as access and safety would be factors used by the City to determine if the routing plan is adequate. Mitigation measure Traffic-6 would require the use of flag persons on both Highland Avenue and Laurel Way to direct traffic on the designated construction traffic route during periods of high truck activity in order to reduce the potential for traffic accidents and ensure that construction vehicles do not inhibit traffic flows on either roadway. Implementation of these two mitigation measures would reduce construction traffic impacts to a less than significant level.

Comment I-2: Commenter believes that making Highland Avenue a one-way street would resolve many of the traffic safety issues on the roadway without affecting the ability of the fire station at the top of Highland Avenue to respond to emergencies.

Response I-2: The City has not accepted dedication of Highland Avenue, and the maintenance of Highland Avenue is not the responsibility of the City. The City is therefore not in a position to consider changes to Highland Avenue. Any change to the configuration or direction of traffic flow on Highland Avenue could have significant impacts on traffic flow and traffic patterns. At a minimum, a separate traffic study would be required to determine the impacts of making Highland Avenue a one-way street. Such a study would need to review the impacts of one-way traffic flow on Highland Avenue under either an eastbound or westbound traffic direction scenario. Such a traffic study is outside the scope of this EIR.

Comment I-3: Commenter requests that Figure 2.3-2 on page 2-5 of the Draft EIR be revised from degree of slope to percent of slope.

Response I-3: The data used to generate the figure are the most detailed slope information currently available for the project area. The data cannot be meaningfully manipulated in the manner requested by the commenter as the "pixel" size of the data points are too large and not refined enough to provide the requested slope percent data.
Comment I-4: Commenter questions how only 45 mature trees would need to be removed as part of the construction of the proposed 18 residences in Phase II. The commenter also requests a definition of how a mature tree is defined for this analysis. The commenter also requests the total number of trees with a trunk diameter of 4 inches or more that would be removed as part of the project.

Response I-4: The revised project description states that 43 mature trees would be removed as part of Phase II construction. The applicant has submitted project plans showing the approximated locations of the building pads for the 18 proposed residences, and these building pads would require the removal of 43 mature trees. The analysis in the Draft EIR uses the definition of a mature tree included in Section 35.1 of the Redwood City Municipal Code. This definition has been included as a text revision in Section 4.2 of this Revised Final EIR, and is also included below:

Sec. 35.1. - DEFINITIONS:

For the purposes of this Chapter, the following words and phrases shall have the meaning respectively ascribed to them in this Section:

COMMISSION: The word “commission” shall be defined as the Park and Recreation Commission.

TREE: The word “tree” shall be defined, unless otherwise indicated in this Chapter, as:

A. Any woody plant characterized by having a single trunk of a circumference of thirty-eight inches (38”) or more, measured at any point between six inches (6”) and thirty-six inches (36”) above ground level; or

B. Any woody plant characterized by having a single trunk which has been found by the Park and Recreation Commission to have special significance to the community, which plant shall be designated a “heritage tree.”

Comment I-5: Commenter believes that the arborist report included in Appendix E of the Draft EIR is biased in favor of the applicants, and requests that a second arborist report be prepared from an independent source.

Response I-5: The arborist report submitted by the applicant has been peer reviewed by the City for accuracy, the City staff has deemed the report to be adequate and correct, and agrees with the findings and conclusions in the report.

Comment I-6: Commenter requests clarification on the specific slope angle used to calculate the floor area limits for the proposed residences under Alternative B, and whether the percent of allowable floor area varies depending on the slope angle. Commenter also requests a table similar to Table 2.3-1 for the proposed project that shows the maximum floor area under the Alternative B scenario.

Response I-6: The specific slope angle used for each lot is the average slope of the lot, which is calculated using the City of Redwood City’s slope-density formula as per Section 23.2 of the City Ordinances. The slope density formula does vary depending on the average slope of the lot, as shown in Table 5.3-3 on page 5-6 of the Draft EIR. Table 5.3-4 on page 5-7 of the Draft EIR provides the maximum floor area limits under Alternative B. Section 4.2 of this Revised Final EIR provides additional information on how the City developed the slope-density formula used for Alternative B.
J   Oded Haner, Landowners’ Representative
    John Ward, Project Manager

Comment J-1: Commenter summarizes the project alternatives outlined in the Draft EIR and notes that Alternatives B and C would significantly reduce house sizes based on differing slope-density formulas.

Response J-1: The comment is noted.

Comment J-2: Commenter is concerned that the reduced floor area limits in Alternatives B and C could render the project financially infeasible, due to the corresponding loss of property value and the financial costs of entitling and building the project.

Response J-2: Please see response to Comment J-4 concerning the square footage of the residences in Alternative B. The comment regarding the expenditure of cost for entitlements and the construction of improvements is noted.

Comment J-3: Commenter explains the increased costs involved in residential construction on hillside lots, particularly the additional foundation costs.

Response J-3: The comment is noted.

Comment J-4: Commenter notes that the square-footage limitations of Alternatives B and C would reduce the effective living area of 7 of the 18 proposed homes to approximately 1,400 square feet, which would be considerably smaller than contemporary single-family residences and would not be marketable.

Response J-4: The commenter’s assumptions and calculations are correct. The comment is noted.

Comment J-5: Commenter notes that Alternative B could result in reduced environmental impacts compared to the proposed project, but that any reductions in environmental impacts would be minor as Alternative B still involves the construction of 16 new residences. The commenter also states that the smaller residence sizes under Alternative B would not justify the financial hardships of developing the project.

Response J-5: The commenter is correct in stating that Alternative B may only result in a slight incremental reduction in environmental impacts compared to the proposed project. Please also see response to Comment L-64. The comment regarding financial hardships related to constructing a project involving smaller residences is noted.

Comment J-6: Commenter states that the difference in environmental impacts associated with grading and tree removal between larger homes and smaller homes is insignificant. The commenter also notes that the PD application would restrict the maximum allowable impervious surface to no more than 40 percent of the lot, which is considerably less than the 60 percent allowed under the R-H zoning designation. The commenter also notes that a total of no more than 45 trees would be removed as part of the project, of which nearly half are in poor to very poor condition.

Response J-6: The comment is noted.

Comment J-7: Commenter states that the PD application takes into account the environmental factors of the site, and that the Draft EIR concludes that the project would not create any significant environmental impacts with the implementation of the identified mitigation measures.

Response J-7: The comment is noted. The commenter is correct that any potentially significant impacts identified in the Draft EIR have been determined to be reduced to a less than significant level with implementation of the identified mitigation measures.
Comment J-8: Commenter disagrees with the information regarding the average size of existing neighborhood homes provided on page 5-6 of the Draft EIR, and provides a list of residence sizes in the neighborhood. The commenter also states more recent residential approvals have been for substantially larger homes than those built in earlier decades.

Response J-8: Additional text has been added to Section 2, Project Description of the Draft EIR, to reflect the information submitted by the applicant. This information indicates that residence sizes have grown substantially over those built in previous decades. The text edits can be found in Section 4.2 3.4 of this Revised Final EIR.

Comment J-9: Commenter requests that the Draft EIR include a revised Reduced Density Alternative that divides the project site into four distinct areas of development – Lots 1-5, Lots 7-10, Lots 11-13, and Lots 14-19 – and provide separate floor area limits for each area such that the average floor area maximum for all 18 lots would be 3,500, including garage.

Response J-9: City staff has discussed this request with the applicant, and both parties have agreed to not modify the existing Reduced Floor Area Alternative (Alternative B) or add a new alternative to the EIR. Instead, the Revised Final EIR provides additional information in Section 4.2 3.4 regarding existing development in the project area, and provides new text analyzing average house sizes in the area by decade.

K  Richard Guinon
3666 Glenwood Avenue
Redwood City, California 94062

Comment K-1: Commenter opposes the project as overly ambitious and an improper fit for the neighborhood, and is concerned that approval of this project would create precedence for reckless building that would destroy the character of the Emerald Hills Neighborhood.

Response K-1: The comment is noted.

Comment K-2: Commenter notes that the subject lots are zoned Residential Hillside (R-H), and quotes language from the R-H zoning regulations as to the purpose of the R-H zoning district. The commenter also notes that these lots are non-conforming with regard to the R-H zoning designation, and that these lots were non-conforming lots at the time that the current property owners purchased the lots.

Response K-2: The commenter’s statements are factual and correct.

Comment K-3: Commenter believes that the proposed project violates the purpose of the R-H district, which is to allow development in the hilly areas of Redwood City commensurate with the natural topography. The commenter also believes that, while all of the impact issues raised in the Draft EIR are addressed through mitigation measures, there are still issues that are not adequately addressed.

Response K-3: The comment is noted. The applicant’s stated purpose for the proposed project is to develop a residential project that is substantially similar to the surrounding development and that makes the best use of the steep topography of the site.

Comment K-4: Commenter believes that wetting down soils containing serpentine (which can produce air-borne asbestos) may not be sufficient to control exposure of neighbors and construction workers to air-borne asbestos.

Response K-4: The project would be required to adhere to all City of Redwood City Building and Engineering Division requirements for construction activities involving serpentine soils, should such soils be encountered in the design-level geotechnical investigations or during construction. In
addition, mitigation measure Geology-1 on page 3.5-12 of the Draft EIR contains a requirement that any exposed soils containing serpentinite rock be capped with asbestos-free soil. These requirements would ensure that any risks from serpentinite and air-borne asbestos are reduced to a less than significant level.

Comment K-5: Commenter expresses concerns regarding the potential failure of both proposed temporary and permanent drainage infrastructure, such as cofferdams, bioretention basins, and stormwater retention pipes. Commenter is also concerned that the increase in impermeable surfaces would result in an increased volume of stormwater discharging into the unnamed drainage channel, which could result in increased erosion, property damage, and safety impacts.

Response K-5: All temporary and permanent drainage infrastructure improvements would be required to adhere to all City of Redwood City Building and Engineering Division requirements for construction. Please see response to Comment D-5.

Comment K-6: Commenter expresses opposition to the proposed removal of the existing landslides on Lots 14 and 15, comparing the proposed measures to strip mining. Commenter also expresses concern that drilling deep pier holes for foundations could fracture the bedrock, create fissures that redirect groundwater flows, and potentially result in the failure of the hillside.

Response K-6: The geotechnical report submitted by the applicant and peer reviewed by the City (see Appendix E of the Draft EIR) characterizes the existing landslide on Lots 14 and 15 as a shallow landslide, and recommends the removal of the creeping soils only. Please see response to Comment E-11 for a discussion of the design-level geotechnical reports required as part of mitigation measure Geology-2. Consideration of impacts from drilling piers for foundations would be determined once the design-level engineering for each residence has been completed and a design-level geotechnical investigation performed for each lot. Mitigation measure Geology-2 also requires that the applicant follow all recommendations in the design-level geotechnical investigation for stabilizing slopes in regard to pier drilling.

Comment K-7: Commenter is concerned regarding unavoidable potential risks for air and water pollution. Commenter also states that the up to nine years of project construction would produce unacceptable noise levels for the neighborhood.

Response K-7: The air quality analysis in the Draft EIR determined that construction air pollution emissions would remain below all significance thresholds established by federal, state, and local regulations. Recommended measure Air Quality-1 would further reduce the already less than significant air quality impacts of the project.

Project construction activities have the potential to release hazardous materials, contaminate stormwater, or produce erosion that would affect water quality and otherwise expose people to health risks. Various mitigation measures have been included in the Draft EIR to reduce these potential impacts to a less than significant level. Mitigation measures Hazards-1 and Hydrology-5 would require the development of a construction safety plan that would include control methods, containment and storage methods, and spill control practices in order to reduce the exposure of construction workers and the public to hazardous materials. Mitigation measures Hydrology-2 and Hydrology-3 include requirements intended to reduce the risk of stormwater contamination. Mitigation measures Geology-1 through Geology-4 and Hydrology-1 would require implementation of a list of measures to reduce the risk of erosion. Issues of water quality are therefore addressed and mitigated in the Draft EIR.

Project construction could last as long as five years, and the Draft EIR identifies that project construction could result in potentially significant noise impacts to the surrounding community. Mitigation measures Noise-1 through Noise-4 and Traffic-4 address construction noise and reduces the potential impact of construction noise to a less than significant level. These mitigation
measures include limits on the hours of construction, the hours of truck traffic, and the number of residences that can be under construction at one time. The measures also include methods to reduce the noise of equipment and vehicles on the construction site, and the establishment of a Disturbance Coordinator to address any noise issues that arise.

**Comment K-8:** Commenter states that the traffic calculations in the Draft EIR do not include traffic trip impacts from the hauling of excavated soils from the project site, and from other construction traffic.

**Response K-8:** Construction traffic is discussed in detail in Appendix E, document 30, pages 4 and 5. Construction traffic would likely be most intense during the grading stage of Phase I. The traffic analysis concludes that construction traffic volumes would remain low throughout Phases I and II, and would have a less than significant impact on traffic trips.

**Comment K-9:** Commenter believes that the proposed mitigation is inadequate to address the project’s visual impacts, and that development on slopes of greater than 30 percent is not consistent with the Emerald Hills Neighborhood.

**Response K-9:** The analysis in the Draft EIR recognizes that the removal of approximately half of the mature trees on the site and the construction of the roadway improvements, infrastructure improvements, and 18 new residences represents a significant change to the character of the project site. The proposed single-family development is substantially similar to the existing residential development on the hillside. Mitigation measures Aesthetics-1 through Aesthetics-4 are intended to reduce the visual impacts of the project by using landscaping and lighting designs to screen the bulk of the massing of the new residences and infrastructure improvements from view, replace the existing vegetative canopy to the extent feasible, and block new light and glare from affecting neighboring residents. The implementation of these mitigation measures has been determined to reduce the project’s visual impacts to a less than significant level.

**Comment K-10:** Commenter believes that any development on the subject lots should conform to the same development regulations followed by the remainder of the neighborhood. The commenter states that no square footage bonus should be provided as an incentive to merge lots, and that merging multiple non-conforming lots does not create buildable lots. The commenter believes that the City is not under any obligation to allow the applicants to develop these lots, and that the applicants knew they were taking a speculative risk purchasing these properties.

**Response K-10:** The comments are noted regarding a desire to have development on the subject lots conform to R-H zoning regulations, and the commenter’s opposition to the square footage bonus suggested in Alternative C.

The subject lots are legal but non-conforming in regard to lot dimensions and lot area; merging two or more of these lots together could produce a lot with conforming dimensions. However, since most of the subject lots possess an average slope in excess of 30 percent, merging two or more of these lots would likely still produce a lot with an average slope of greater than 30 percent. Therefore, a PD permit would still likely be required for any development on the subject property even if two or more parcels were merged together. Since the subject lots were legally created and subdivided and are zoned for single-family residential development, the property owners have an implied right to some level of development of these lots.
3.2 PLANNING COMMISSION VERBAL COMMENTS

L  Comments made at the April 6, 2010 Planning Commission Public Hearing on the Laurel Way Planned Development Project

Comment L-1: Commenter asks why a sidewalk is being included with the project, as there are no other sidewalks in the area.

Response L-1: The applicant has acknowledged that a number of local residents take walks on the subject property, both because of its rural nature and because of the safety hazards of walking on Highland Avenue. The applicant has proposed the sidewalk in order to continue to provide a safe walking environment for nearby residents. The design and materials of the sidewalk would be determined as part of the review of the Planned Development permit application. Options to a concrete sidewalk, such as the use of decomposed granite to create a gravel path, would be considered during the Planned Development permit review.

Comment L-2: Commenter opposes the removal of approximately half of the trees from the site, believes that the proposed 15-gallon-size replacement trees are too small and would take too long to mature, and opposes the idea of the area losing its rural, forest-like character as a result of the project.

Response L-2: The character of the project site would be altered as a result of the project, with the resulting development appearing substantially similar to other residential development in the area. Evidence has shown that smaller 15-gallon-size trees mature faster than larger specimens, and quickly outstrip the growth of 24-inch or 36-inch box trees. It is believed that younger trees are more readily able to adapt to their new environment, and thus are able to grow faster than their more mature counterparts. While larger tree specimens may be able to provide partial screening at the time of planting, smaller trees are more likely to provide mature screening in a shorter span of time.

Comment L-3: Commenter questions who is liable if a landslide results from the construction of this project.

Response L-3: Please see the response to Comment F-2. Liability issues are outside the scope of CEQA, and are not addressed in this Final EIR.

Comment L-4: Commenter is concerned over the potential loss in his property values due to the proposed development.

Response L-4: Property value issues are outside the scope of CEQA, and are not addressed in this Final EIR.

Comment L-5: Commenter is concerned that the hillside is delicate and that the proposed project would render it unstable.

Response L-5: Please see response to Comment E-11.

Comment L-6: Commenter opposes the construction of retaining walls and fences behind his property.

Response L-6: The comment is noted.

Comment L-7: Commenter believes that the proposed replacement trees would take too long to mature.

Response L-7: Please see response to Comment L-2.
Comment L-8: Commenter is concerned about the narrowness of Highland Avenue, the presence of blind turns, and the unsafe speeds and maneuvers of many motorists. The commenter is concerned that the addition of the 18 new homes would exacerbate the existing traffic issues.

Response L-8: Please see the response to comment A-1.

Comment L-9: Commenter is concerned that construction traffic would last 20 years, and is concerned that construction traffic would pose its own safety issues.

Response L-9: The duration of project construction would be a total of five years, with the possibility of a one-time, 1 year extension by the Planning Commission. If construction is not completed within these five years, then the applicant would need to reapply to the City for approvals. The mitigation measures presented in Section 3.12, Transportation and Traffic, in the Draft EIR address traffic safety during both construction and post construction. These measures include preparation of a truck routing and staging plan, limitations on construction hours, limitations on the number of residences that can be under construction at one time, installation of a stop sign on Laurel Way at Highland Avenue, and the use of flag persons to maintain safety on Laurel Way and Highland Avenue, and ensure that roadways remain open to through traffic throughout project construction. Please also see response to Comment K-8 for additional comments regarding construction traffic.

Comment L-10: Commenter believes that air-borne asbestos in any amount is unacceptable.

Response L-10: Please see the response to Comment K-4.

Comment L-11: Commenter is concerned that the failure of temporary or permanent drainage infrastructure improvements could jeopardize the safety of people and residences downhill of the project site.

Response L-11: Please see the response to Comment K-5.

Comment L-12: Commenter is concerned that adding more stormwater flow to the unnamed drainage channel would result in erosion, falling trees, and landslides.

Response L-12: Please see the response to Comment D-5.

Comment L-13: Commenter opposes the proposed mitigation to remove the existing landslides from Lots 14 and 15.

Response L-13: Please see the response to Comment K-6.

Comment L-14: Commenter believes that the noise produced during the up to 9 years of construction would be intense.

Response L-14: Construction noise is addressed on pages 3.9-7 through 3.9-10 of the Draft EIR. Construction noise would have the potential to create an increase in ambient noise over existing levels. Mitigation measures Noise-1 through Noise-4 and Traffic-4 include measures that would reduce construction noise impacts to a less than significant level. These mitigation measures would limit the hours of construction and the hours of truck traffic, limit the number of residences that could be under construction at one time, implement a series of noise reduction conditions, and establish Disturbance Coordinator to address any noise complaints that may arise.

Comment L-15: Commenter believes that the proposed residences are not in scale with the development in the rest of the neighborhood.

Response L-15: The comment is noted. Please see the text edits in Section 4.2.3 of this Revised Final EIR to Sections 2 and 5 of the Draft EIR, as well as Appendix C of this Revised Final EIR. The revised information generated by the City shows that the average size of the proposed
residences (3,965 square feet) is larger than nearly identical to the average size of the existing residences in the project vicinity (2,643 3,964 square feet).

**Comment L-16:** Commenter states that the loss of existing mature trees would have a large effect on the appearance of the neighborhood, and that no amount of landscaping would screen the retaining walls and bioretention basins from view.

**Response L-16:** The proposed development would change the character of the hillside, and would result in a development that is substantially similar to the residential development in the neighborhood. Approximately half of the existing mature trees would be maintained on the site, and a total of 128 new trees would be planted to replace the 90 94 trees removed as part of the project. There are five bioretention basins proposed as part of the project, and the retaining walls for these features would not exceed 4 feet in height, making the bioretention basins unlikely to be prominent visual features in the neighborhood. A portion of the improved roadway would be split level, with the upper lane supported by a retaining wall for a distance of approximately 300 feet. This retaining wall would reach a peak of 16 feet in height at the midpoint of its length, tapering back down to grade at either end. It is unlikely that the central segment of this retaining wall would be capable of being screened from all vantage points downhill of the site. The project includes the planting of vines on the downhill side of the retaining wall to soften the appearance of the wall and help the wall blend into the vegetation elsewhere on the hillside.

**Comment L-17:** Commenter is opposed to the proposed drainage system, and expresses concerns over the failure of any portion of the drainage system.

**Response L-17:** Please see the response to Comment K-5.

**Comment L-18:** Commenter questions how the No Project Alternative described in the Draft EIR could result in greater impacts than the proposed project.

**Response L-18:** The No Project Alternative is a required element of an EIR, and allows the public to review the potential impacts if the proposed project is not approved. In the case of the Laurel Way Planned Development project, the project involves 18 20 existing parcels that are legally subdivided and zoned for residential development. The legal nature of these lots means that there is some implied level of development rights for the owners of these parcels. Denial of the current application request could result in two potential outcomes under the No Project Alternative.

The first potential outcome would result in no residential development occurring at the site. The hillside would remain undeveloped and unmaintained, though there would likely be the need for some amount of roadway improvements in the future to maintain access to the two existing residences on the unimproved portion of Laurel Way. If the No Project Alternative were to result in no development on this portion of the hillside, then the No Project Alternative would result in reduced environmental impacts compared to the proposed project in regard to most environmental categories. However, some existing issues would continue to be potentially significant environmental impacts in the future. These issues include:

- Inadequate access for emergency vehicles to the two existing residences on the unimproved portion of Laurel Way
- Inadequate infrastructure, water supply, and water flow to fight any fires affecting the hillside or the two existing residences on the unimproved portion of Laurel Way
- A likely continued lack of maintenance of the hillside to reduce potential fuel for grass fires and to prune or remove dead and dying trees
- Continued potential for flooding and erosion at the bend in the unimproved portion of Laurel Way due to the inadequate sizing of the existing culvert
• Continued potential for erosion in the unnamed drainage channel downstream of the Laurel Way culvert
• Continued potential for landslides and earth movement from the portions of the project site identified to potentially have existing landslides.

The second potential outcome would be for the various property owners of the 18 existing parcels to apply individually for permits to construct residences. This outcome could result in a piecemeal development of the hillside that would be unlikely to include a unified system of improvements to the roadway, drainage, and utilities. This second potential outcome could result in greater environmental impacts than the proposed project. Table 5.3-1 in the Draft EIR provides a comparison between the proposed project and the three alternatives, and the second potential outcome of the No Project Alternative was used for purposes of comparing potential environmental impacts.

Comment L-19: Commenter questions which lots would be merged under Alternative C, and how the square footage bonus for a lot merger would benefit the community.

Response L-19: Alternative C is designed to provide an incentive for property owners to merge two or more lots together. The merging of lots would be voluntary, and there would be no requirement that any of the lots be merged under this alternative. Thus, this alternative could potentially result in no merging of lots, and the development of 16 residences in a fashion identical to that outlined in Alternative B. However, should two of more lots be merged under Alternative C, the result would be the construction of fewer than the 16 residences currently proposed under both the proposed alternative and Alternative B. The square footage bonus proposed under Alternative C is intended to provide an incentive for property owners to merge their lots, with the goal of reducing the total number of residences constructed on the project site.

Comment L-20: Commenter believes that the Draft EIR does not adequately discuss whether construction vehicles can safely navigate Highland Avenue.

Response L-20: Please see the response to Comment L-9. The Traffic Management Plan required in mitigation measure Traffic-1 is intended to address traffic safety, site access, and maintaining through access for all vehicles during project construction. In addition, mitigation measure Traffic-6 would require the use of flag persons during periods of high truck activity on both Laurel Way and Highland Avenue to address issues of traffic safety and traffic movement. Implementation of these two mitigation measures would reduce any construction impacts on traffic safety to a less than significant level.

Comment L-21: Commenter states that there is no discussion of or mitigation for pedestrian safety on Highland Avenue.

Response L-21: Please see the response to Comment A-1. The existing configuration and safety conditions on Highland Avenue are part of the baseline environment. The proposed project would not significantly contribute to safety hazards on Highland Avenue.

Comment L-22: Commenter believes that the average slope figures provided in the Draft EIR are incorrect.

Response L-22: Please see the response to Comment F-3.

Comment L-23: Commenter believes that the proposed size of the residences would not be in keeping with the neighborhood.

Response L-23: The comment is noted. Please see the response to Comment L-15.
Comment L-24: Commenter states that the 18 proposed homes would result in more than 18 additional cars in the neighborhood, as most families possess more than one car.

Response L-24: The traffic analyses included in Appendix E used industry standards to determine the average number of daily trips per single-family household. These industry standards reflect the fact that most families in single-family homes have more than one car.

Comment L-25: Commenter believes that statistical significance and scientific figures cannot be applied to issues regarding safety and aesthetics.

Response L-25: The comment is noted.

Comment L-26: Commenter states that traffic speeds on Highland Avenue are too fast.

Response L-26: The comment is noted.

Comment L-27: Commenter asked whether the consultant had walked or bicycled on Highland Avenue.

Response L-27: The comment is noted. The question raised by the commenter is not relevant to CEQA, and is not addressed in this Final EIR.

Comment L-28: Commenter believes that the proposed replacement trees would not mitigate the loss of the mature trees to be removed as part of the project.

Response L-28: Please see response to Comment L-2.

Comment L-29: Commenter states that the information on pages 2-2 through 2-4 of the Draft EIR regarding average parcel and residence size in the neighborhood is incorrect and misleading.

Response L-29: The information presented in the Draft EIR regarding average parcel and residence size in the neighborhood was obtained by the City from County Assessor records and City files. This information has been further refined since the circulation of the Draft EIR, and updated parcel and residence size information is presented in Section 4.2 3.3 of this Revised Final EIR. Appendix C of this Revised Final EIR has also been updated to provide the most accurate average residence size information available to the City.

Comment L-30: Commenter expressed support for combining the subject lots to create fewer homes on the project site.

Response L-30: The comment is noted.

Comment L-31: Commenter opposes the City providing any special treatment for the applicants.

Response L-31: The comment is noted.

Comment L-32: Commenter states that the project would result in the loss of sun access for neighbors downhill of the project site.

Response L-32: The applicant has submitted a shadow study (Appendix I of the Draft EIR) that shows the likely shadow impacts of the project. The exact location and massing of each of the proposed residences is estimated, as none of the residences have yet been designed, but each home was assumed to be the maximum size allowed. The shadow study looks at the shadows cast by the residences near the two extremes of the year - June 1st and December 1st.

On June 1st, the shadows cast by the residences in both the morning and the afternoon are minimal, as the sun is close to being directly overhead, and the shadows at 10:00 AM and 4:00 PM do not extend beyond the boundaries of the parcels.
On December 1st, morning and afternoon shadows are much longer due to the sun being lower on the horizon. During both the morning and afternoon hours, the shadow cast by the hillside itself is longer than most of the shadows that would be cast by the proposed residences. At 10:00 AM, however, the two residences at the end of Laurel Way (Lots 9 and 10) would cast shadows extending beyond those of the hillside itself, and these shadows would be cast down into the uninhabited valley to the north of George L. Garrett Jr. Memorial Park. At 4:00 PM, several of the proposed residences would cast shadows extending beyond the shadows cast by the hillside. The residences on Lots 1 and 5 would cast shadows into the backyards of properties bordering the project site, but not onto existing residences. Similarly, the residences on Lots 7 through 9 would cast shadows onto yards and the roadway of Glenwood Avenue, but not onto existing residences. Only the residence on Lot 10, located at the end of the Laurel Way cul-de-sac, would cast a shadow onto a residence on Glenwood Avenue. This shadow cast by the residence on Lot 10 would be superseded by the shadow cast by the hillside in a short span of time. As indicated on page 3.1-6 of the Draft EIR, the shadow-casting impacts of the project would be less than significant.

Comment L-33: Commenter states that construction traffic on Highland Avenue would deteriorate the roadway, and is concerned that the City does not maintain this roadway.

Response L-33: As with Laurel Way, the City has not accepted dedication of Highland Avenue, and therefore is not required to maintain this roadway. Historically, however, the City has performed work to maintain this roadway, and anticipates performing this maintenance into the future. In addition, mitigation measure Traffic-3 (as revised in Section 4.2 3.3) requires that the applicant submit Traffic Index calculations for Laurel Way and Highland Avenue, both before and during project construction. These calculations would be used by the City to determine the potential for project construction to deteriorate these roadways, and to calculate possible reimbursement from the applicant to help pay for roadway repairs.

Comment L-34: Commenter states that a stop sign is needed at the intersection of Highland Avenue and Laurel Way.

Response L-34: Mitigation measure Traffic-5 would require that a stop sign and stop bar be installed on Laurel Way at Highland Avenue prior to the commencement of Phase I construction activities.

Comment L-35: Commenter states that the project would exacerbate on street parking issues on Laurel Way.

Response L-35: The City believes that the nine on-street parking spaces proposed as part of the project would provide adequate on street parking to meet the needs of the 16 proposed residences. In addition, mitigation measure Traffic-8 would require that any new residence with more than four bedrooms provide adequate covered on-site parking to meet all of the City’s parking regulations. The project would therefore have a less than significant impact to on street parking.

Comment L-36: Commenter states that project construction would result in debris in the roadway, which would in turn result in vehicle damage and flat tires. The commenter believes that the applicant should pay for any such vehicle damage sustained as a result of this debris.

Response L-36: The project would be required to conform to all Best Management Practices (BMPs) required of construction projects through the building permit process. These BMPs would include ensuring that debris-removing vehicles are not overloaded and thereby reduce the risk of dropping debris into the roadway. The applicant would also be required to perform periodic street sweeping to remove any incidental debris from the construction truck traffic route established as part of mitigation measure Traffic-1. With the implementation of these BMPs and mitigation
measure Traffic-1, impacts of construction debris to roadways and other motorists would be reduced to a less than significant level.

**Comment L-37:** Commenter inquires whether the City would consider widening Highland Avenue between Laurel Way and Jefferson Avenue.

**Response L-37:** The City has not accepted dedication of Highland Avenue, and is not considering widening the street at this time.

**Comment L-38:** Commenter states that there are a number of springs in the area, and that these springs are not addressed in the Draft EIR.

**Response L-38:** Three small seeps have been identified at the south side of the project site, as indicated on pages 3.7-6 and 3.7-7 of the Draft EIR. These three seeps are on a steep north-facing slope downhill of existing residences. These three seeps would not be altered during the construction of Phase I, but would need to be filled during the rough grading activities in Phase II, as described on page 3.7-11 of the Draft EIR. As part of the design-level geotechnical investigations required in mitigation measure Geology-3, measures would be identified to ensure that these seeps would not cause damage to structures or hillside instability as a result of the project.

**Comment L-39:** Commenter states that construction of a residence on Vista Way in the 1980s resulted in an accident that caused debris to fall down the hillside.

**Response L-39:** The comment is noted.

**Comment L-40:** Commenter states that mercury mining took place in the area in the 1910s and 1920s, and that this issue is not addressed in the Draft EIR.

**Response L-40:** A cultural resources assessment was prepared for the project, and is included in Appendix E of the Draft EIR as document 7. The analysis in the cultural resources literature review and site assessment found no historic or site evidence of mining activities on or around the project site.

**Comment L-41:** Commenter states that stormwater needs to be filtered before entering the drainage channel, and that this issue is not addressed in the Draft EIR.

**Response L-41:** As indicated on page 2-15 of the Draft EIR, stormwater on the improved roadway would drain into collection pipes that would discharge into three filtration units at the bend in the roadway. The three filtration units would treat the stormwater runoff prior to discharge into the culvert and drainage swale.

**Comment L-42:** Commenter questions whether there is adequate capacity in the stormwater drainage system to handle the increased runoff that would result from the project.

**Response L-42:** Please see the response to Comment E-13.

**Comment L-43:** Commenter questions why sidewalks have been proposed with this project when the surrounding streets do not have sidewalks.

**Response L-43:** Please see the response to Comment L-1.

**Comment L-44:** Commenter opposes the four lanes of roadway proposed for this project.

**Response L-44:** The proposed improvements to the unimproved portion of Laurel Way include widening the roadway to allow for one lane in either direction. These improvements would result in a total of two lanes, not four lanes.
Comment L-45: Commenter is concerned that the removal of mature trees would have impacts on aesthetics and landslide risk.

Response L-45: Please see the responses to Comments D-5, E-11, and L-2.

Comment L-46: Commenter is opposed to the number of residences proposed in this project.

Response L-46: The comment is noted.

Comment L-47: Commenter requests more information regarding accidents and traffic safety on Highland Avenue, and in particular would like to have more information regarding non-motorized vehicle traffic.

Response L-47: Table 3.3-1 provides detailed traffic accident information for Highland Avenue in the project vicinity. This data covers the years from 2004 through 2009.

Comments L-48, L-49, and L-50: Commenters asked questions regarding how the residential foundations would be drilled, how the depth of drilling is determined, when a soil report is required in the foundation drilling process, and what the impacts could be from drilling activities.

Responses L-48, L-49, and L-50: The design-level engineering of each of the residences has not yet been performed. This design-level engineering would be performed in conjunction with the design-level geotechnical investigation required as part of mitigation measure Geology-2. The specific soil and rock conditions of each lot would be determined as part of this investigation, and the appropriate type of foundation and depth of piers required would be established at that time. Additional measures may be identified in the geotechnical investigation to reduce the potential for grading and foundation work to destabilize the hillside or adversely affect groundwater flows. All recommendations of these geotechnical reports would be implemented to the extent feasible, reducing landslide and soil creep impacts to a less than significant level.

Comment L-51: Commenter agrees with an earlier request for additional information regarding traffic safety on Highland Avenue.

Response L-51: Please see the response to Comment L-47.

Comment L-52: Commenter asks where the square footage bonus in Alternative C originated.

Response L-52: City staff arrived at the figure for the square footage bonus incentive in an attempt to balance the need to offer a sufficient incentive to entice property owners to voluntarily merge lots with the goal of reducing the overall impacts of residential development on the subject lot. If the square footage bonus incentive were too small, then it would be an inadequate incentive for the applicants to merge lots. If the square footage bonus were too large, then the resulting homes built on the property might be fewer in number, but could be so large as to be out of scale with surrounding development. City staff arrived at the figure of 900 square feet as the lot merger incentive bonus in part based on research into similar incentives proposed in other jurisdictions.

Comment L-53: Commenter states that additional information is required regarding traffic safety on Highland Avenue.

Response L-53: Please see the response to Comment L-47.

Comment L-54: Commenter requested further explanation of the No Project Alternative, as the Draft EIR appears to make contradictory statements about the impacts that would result from this alternative.

Response L-54: Please see the response to Comment L-18.
### Table 3.3-1: 2004 Through 2009 Detailed Traffic Accident Information for Highland Avenue

<table>
<thead>
<tr>
<th>Accident Date</th>
<th>Accident Time</th>
<th>Police Report no</th>
<th>Street Address</th>
<th>Primary Address</th>
<th>Cross Street</th>
<th>Accident Type</th>
<th>Weather 1</th>
<th>Lighting</th>
<th>Type of Collision</th>
<th>Motor Vehicle Involved With</th>
<th>Animal-Fixed-Other</th>
<th>Pedestrian's Actions</th>
<th>Vehicle 1 Movement</th>
<th>Vehicle 2 Movement</th>
<th>Party at Fault</th>
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<td>5/12/2004</td>
<td>2:10 PM</td>
<td>04-05-0371</td>
<td>Highland Avenue</td>
<td>Laurel Street</td>
<td>Property Damage</td>
<td>Clear Daylight</td>
<td>Broadside</td>
<td>Other Motor Vehicle</td>
<td>No Pedestrians Involved</td>
<td>Proceeding Straight</td>
<td>1</td>
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<tr>
<td>5/20/2004</td>
<td>5:15 PM</td>
<td>04-05-0635</td>
<td>Jefferson Avenue</td>
<td>Highland Avenue</td>
<td>Property Damage</td>
<td>Clear Daylight</td>
<td>Sideswipe</td>
<td>Other Motor Vehicle</td>
<td>No Pedestrians Involved</td>
<td>Proceeding Straight</td>
<td>Parked</td>
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<td>10/20/2004</td>
<td>7:04 AM</td>
<td>04-10-0594</td>
<td>Highland Avenue</td>
<td>Fatality</td>
<td>Clear Daylight</td>
<td>Sideswipe</td>
<td>Other Motor Vehicle</td>
<td>No Pedestrians Involved</td>
<td>Proceeding Straight</td>
<td>Making Right Turn</td>
<td>1</td>
<td></td>
<td></td>
<td></td>
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<td>5/27/2006</td>
<td>7:04 AM</td>
<td>06-05-0685</td>
<td>Jefferson Avenue</td>
<td>Highland Avenue</td>
<td>Injury</td>
<td>Clear Daylight</td>
<td>Broadside</td>
<td>Other Object: Motorcycle</td>
<td>Making Left Turn</td>
<td>Proceeding Straight</td>
<td>1</td>
<td></td>
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<td>6/8/2006</td>
<td>8:48 AM</td>
<td>06-06-0160</td>
<td>Highland Avenue</td>
<td>Altamont Way</td>
<td>Property Damage</td>
<td>Clear Daylight</td>
<td>Sideswipe</td>
<td>Other Motor Vehicle</td>
<td>No Pedestrians Involved</td>
<td>Other Unsafe Turning</td>
<td>Parked</td>
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<td>9:47 AM</td>
<td>06-08-0375</td>
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<td>Jefferson Avenue</td>
<td>Property Damage</td>
<td>Clear Dark - Street Lights</td>
<td>Hit Object</td>
<td>Fixed Object: Telephone pole</td>
<td>No Pedestrians Involved</td>
<td>Making Left Turn</td>
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<td>06-08-0746</td>
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<td>Highland Avenue</td>
<td>Property Damage</td>
<td>Clear Daylight</td>
<td>Hit Object</td>
<td>Fixed Object: Retaining wall</td>
<td>No Pedestrians Involved</td>
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<td>1/26/2008</td>
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<td>08-01-0744</td>
<td>Canyon Road</td>
<td>Highland Avenue</td>
<td>Property Damage</td>
<td>Clear Dark - Street Lights</td>
<td>Hit Object</td>
<td>Fixed Object: stop sign</td>
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<td>Making Left Turn</td>
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<td>08-01-0893</td>
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<td>Cloudy Daylight</td>
<td>Broadside</td>
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</table>
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Comment L-55: Commenter agrees with earlier statements requesting clarification of the No Project Alternative.

Response L-55: Please see the response to Comment L-18.

Comment L-56: Commenter requested clarification regarding the requirement that proposed structures and improvements maintain a minimum 10-foot setback from the top of the bank of the unnamed drainage channel.

Response L-56: The geologic and geotechnical feasibility evaluation (Appendix E of the Draft EIR, document 8) submitted by the applicant and peer reviewed by the City contains a recommendation on page 13 that any proposed structures and improvements be constructed a minimum of 10 feet away from the top of the existing bank of the unnamed drainage channel. This recommendation has been included as a project requirement in mitigation measure Geology-1 in the Draft EIR. The City recognizes that the 10-foot figure provided in the geologic and geotechnical feasibility evaluation is a minimum figure, and the City has therefore modified mitigation measure Geology-1 to indicate that all proposed structures and improvements shall be set an appropriate distance (emphasis added) from the top of the existing creek banks as determined by the City and per the requirements of Zoning Ordinance Section 32.12 (emphasis added). See Section 4.2 for the full text of the revised mitigation measure Geology-1.

Comment L-57: Commenter requests clarification regarding how a PD permit provides for exceptions to zoning regulations. The commenter stated he would speak directly with staff to expand on his questions.

Response L-57: The subject lots are zoned Residential Hillside (R-H), which includes a list of development regulations including minimum setbacks, maximum building height, and maximum lot coverage. However, the City’s regulations require that lots with an average slope of 30 percent or greater obtain a Planned Development (PD) permit in order to determine the appropriate development regulations for such lots. The majority of the lots in the project area exceed this 30 percent average slope threshold, and thus are subject to the requirement to obtain a PD permit. The PD permit process allows flexibility in and relief from most zoning regulations in order to create a more beneficial design. The PD permit essentially becomes its own zoning district, unique to the subject property, with its own regulations regarding lot size, setbacks, floor area, building height, and other regulations.

Comment L-58: Commenter asks for further information on how Alternative B could result in a reduction in project impacts over the proposed project.

Response L-58: Alternative B would result in significantly smaller homes than those proposed under the project application. The average proposed residence size in the current PD permit request is approximately 3,965 square feet (including a two-car garage), while under Alternative B the average residence size would be 2,479 square feet. The smaller house sizes under Alternative B could result in incrementally smaller environmental impacts in regard to aesthetics, biological resources, geology, and hydrology. The smaller houses under Alternative B would have a smaller footprint, which would mean potentially less surface and subsurface disturbance on each of the lots, with a corresponding potential to slightly reduce biology, geology, and hydrology impacts. The smaller homes would also have a smaller visual mass, and would be incrementally more likely to blend into the other residential development on the hillside. However, Alternative B would still result in the construction of 16-18 residences, so the resulting potential reductions in environmental impacts may be slight and insignificant.
Additional Comments Made at the April 6, 2010 Planning Commission Meeting

In addition to Comments L-1 through L-58 summarized above, the following additional comments were made at the April 6, 2010 Planning Commission meeting but were not included in the approved meeting minutes.

Comment L-59: Commenter states that page 3.5-8 of the Draft EIR indicates the presence of erosion on the project site, and that the Draft EIR inadequately addresses existing erosion and whether the site can accommodate additional residences.

Response L-59: Table 3.5-3 on page 3.5-8 of the Draft EIR lists possible landslides in the project area. When further investigation was performed as part of the geologic and geotechnical feasibility evaluation included in Appendix E of the Draft EIR, some of the potential locations listed in the table proved to not be landslides, while others merited additional investigation. Mitigation measure Geology-1 includes requirements to address the possible existing landslides on the project site. These requirements include detailed geotechnical evaluations of Lot 13 and all lots on the downhill side of Laurel Way for the potential for creek bank erosion or landsliding; removal of the shallow landslide on Lots 14 and 15 and rebuilding with a keyed and benched engineered buttress fill containing subdrains; and further evaluation of the possible landslide near the bottom of Lots 3 and 4. These requirements would reduce the potential impacts from existing landslides on the site to a less than significant level.

Comment L-60: Commenter states that the Draft EIR inadequately addresses how the habitat in the regions of the three identified seeps would be reclaimed.

Response L-60: Page 3.7-11 of the Draft EIR addresses the removal of the seeps and other wetland habitat on the site. The Draft EIR indicates that a total of approximately 1,430 square feet of wetland area (including 470 square feet for the three seeps and 960 square feet of the natural drainage area) would be removed as part of the project. The five bioretention swales would provide replacement wetland habitat on the site. Each bioretention basin and associated swales would provide approximately 400 square feet of wetland habitat, for a total of approximately 2,000 square feet of new wetland habitat to replace the 1,430 square feet of wetland habitat to be removed as part of the project.

Comment L-61: Commenter states that rezoning the site to RH-10 should be analyzed as a project alternative.

Response L-61: Please see the response to Comment E-20.

Comment L-62: Commenter requests more information regarding construction vehicle parking.

Response L-62: Mitigation measures Traffic-1 and Traffic-7 address construction vehicle parking and equipment staging. The text of mitigation measure Traffic-7 has been revised in Section 4.2 of the Revised Final EIR to clarify where construction vehicles and equipment may be parked and staged during construction. No construction vehicles are allowed to be parking and no construction equipment allowed to be staged anywhere on Highland Avenue or on the currently paved portion of Laurel Way. All construction vehicles and equipment must be parked and staged on the subject lots during construction. Once the on street parking spaces are completed as part of Phase I, then construction vehicles may be parked in these on street spaces; until the on street parking spaces are complete, construction vehicles may not be parked anywhere along the currently unimproved portion of Laurel Way.

Comment L-63: Commenter questions whether 9 on street parking spaces are sufficient for the 18 proposed new residences.
Response L-63: Please see the response to Comment L-35.

Comment L-64: Commenter questions why the project is not required to comply with its current zoning designation.

Response L-64: Please see the response to Comment L-57.
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4: REVISIONS AND ERRATA

4.1 Introduction

This section summarizes text revisions and errata to the Draft EIR. Revisions reflect changes identified in the preparation of the responses to comments on the Draft EIR.

Specific changes are listed in page order with reference to the relevant sections and pages in the Draft EIR. Text added to the EIR is underlined; and deleted text is stricken. In addition, specific changes that have been added to the Errata Section since the publication of the August 2010 Final EIR are shown with underline, strikethrough, and gray highlighting.

Some changes to the project description and environmental analysis were made in response to public comments. Revisions include some changes in the project description section regarding permits needed and clarifications to mitigation measures. Neither the comments received nor the responses to those comments introduce significant new information that was not addressed or evaluated in the Draft EIR. No substantial revisions that would merit recirculation of the Draft EIR, as defined by 15073.5(b) of Title 14 of CEQA, were made to the project or analyses after public comment.

The Redwood City General Plan was updated in October 2010. The updated General Plan has been reviewed and the project is consistent with the updated General Plan. References to the General Plan were revised to reflect the October 2010 update.

4.2 Specific Text Edits

4.2.1 OVERVIEW

This section includes specific edits to text found in the Draft EIR and new text added in the Final EIR. The section, page number, and location of the text edit is provided, followed by the specific text changes. Text added to the EIR is underlined; and deleted text is stricken. Edits to the Project Description are found in Chapter 2 of this document.

4.2.2 TEXT EDITS

Executive Summary, page ES-4, first full paragraph

The proposed residences would be new visual elements on the project site. The larger neighborhood is characterized by single-family residences, but the scale of the proposed
residences is larger than substantially similar to that of larger than the average existing residences. Mitigation would require screening vegetation to reduce permanent impacts.

Executive Summary, page ES-11, edits to mitigation measures Aesthetics-1 through Aesthetics-4

Mitigation Measure Aesthetics-1: The applicant shall submit a detailed landscaping plan for the review and approval of the City of Redwood City Planning Division and the City Arborist prior to issuance of building permits for each new residence. The landscaping plan shall indicate how the proposed landscaping shall screen the bulk of the residence from view from the surrounding neighborhood. The landscaping plan shall also indicate how the proposed landscaping replaces the existing brush and landscaping that would be removed for the construction of Phases I and II. The applicant shall construct/install all improvements shown on the approved plans.

Mitigation Measure Aesthetics-2: The applicant shall submit a street lighting and light fixture plan to the City of Redwood City Planning Department Division depicting rural style street lighting for night time safety of the new residents. This plan shall be reviewed and approved prior to the issuance of permits for the construction of Phase I of the project construction. The plan shall include the use of shielded light fixtures that direct light downward, prevent direct glare to nearby residences, and otherwise minimize lighting impacts on residential properties. The applicant shall construct/install all improvements shown on the approved plans.

Mitigation Measure Aesthetics-3: The applicant shall submit a detailed landscaping plan for the review and approval of the City of Redwood City Planning Division and the City Arborist prior to issuance of building permits for construction of Phase I. The landscaping plan shall indicate how the proposed landscaping shall screen the new night time street lighting from adjacent properties. The applicant shall construct/install all improvements shown on the approved plans.

Mitigation Measure Aesthetics-4: The applicant shall submit a detailed landscaping plan for the review and approval of the City of Redwood City Planning Division and the City Arborist prior to issuance of building permits for each new residence. The landscaping plan shall indicate how the proposed landscaping shall screen the new night time lighting from adjacent properties. The applicant shall construct/install all improvements shown on the approved plans.

Executive Summary, page ES-12, edits to recommended measure Air Quality-1

Recommended Measure Air Quality-1: The following control measures from the BAAQMD CEQA Air Quality Guidelines 2009, Table 8-2, shall be implemented in order to reduce air pollutant emissions during project construction:

a) Water all exposed surfaces (e.g. parking areas, staging areas, soil piles, graded areas, and unpaved access roads) at least twice daily.

b) Cover all trucks hauling soil, sand, and other loose materials offsite.

c) Remove all visible mud or dirt track-out onto adjacent public roads using wet power vacuum street sweepers at least once per day. Dry power sweeping would not be allowed.

d) Limit vehicle speeds on unpaved roads to 15 mph.

e) Complete paving of roadways, driveways, and sidewalks as soon as possible. Lay building pads as soon as possible after grading unless seeding or soil binders are used.
f) Minimize idling times either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California air toxics control measure Title 13, Section 2485 of California Code of Regulations). Provide clear signage for construction workers at all access points.

g) Maintain and properly tune all construction equipment in accordance with manufacturer’s specifications. A certified mechanic shall check all equipment prior to operation to determine it is in proper condition.

h) Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours of any complaints. The Air District’s phone number shall also be visible to ensure compliance with applicable regulations.

Executive Summary, page ES-12, edits to mitigation measure Biology-16

Mitigation Measure Biology-16: The applicant shall add provisions within the CC&Rs for the replacement of trees, vegetation, and/or landscaping if said elements fail to survive. Replacement of trees, vegetation, or landscaping shall be in kind, both in quality and quantity, and shall be installed within 90 days of the death of the previous vegetation.

Executive Summary, page ES-14, edits to mitigation measure Biology-4

Mitigation Measure Biology-4: Covenants, Codes, and Restrictions (CC&Rs) shall be developed by the applicant in coordination with appropriate Redwood City staff and a qualified biologist, and USFWS staff in compliance with USFWS and CDFG regulations, to minimize the biological resource impacts of post-development land use and alteration, landscaping activities, and property-owner pesticide and/or biocide use during and after project development.

Executive Summary, page ES-15, edits to mitigation measures Biology-6, Biology-8, and Biology-10

Mitigation Measure Biology-6: The applicant shall propose and incorporate a vegetation maintenance plan for the existing and proposed replacement trees and vegetation located along the private road portion of Laurel Way prior to the issuance of any permits for the construction of Phase I of the project. The vegetation maintenance plan shall describe measures for the protection and preservation of existing and proposed replacement trees and vegetation in perpetuity, including provisions for the planting of new trees and vegetation to replace any future loss of existing or replacement trees and vegetation. The vegetation maintenance plan shall be submitted for the review and approval of the City Arborist. The applicant shall comply with the approved vegetation maintenance plan.

Mitigation Measure Biology-8: The applicant shall obtain all necessary permits pertaining to affected Waters of the United States regulated by the U.S. Army Corps of Engineers, California Department of Fish and Game, and San Francisco Bay Regional Water Quality Control Board. Discharge of fill into Waters of the United States will require a Clean Water Act Section 404 permit from the U.S. Army Corps of Engineers and Clean Water Act Section 401 certification from the San Francisco Bay Regional Water Quality Control Board. The applicant shall comply with the conditions in the approved permits at all times. The permitting process will likely require compensation for impacts to wetlands. Compensation could include purchase of mitigation credits for the affected habitat types at an established mitigation bank, preservation and enhancement of in-kind habitat types, or creation and preservation of in-kind habitat types.

Mitigation Measure Biology-10: A Best Management Practices (BMPs) Plan shall be developed and put in place prior to the initiation of project activities. The BMP Plan shall be
submitted for the review and approval by City staff prior to the issuance of any permits for the construction of Phase I of the project. The BMPs shall include silt fencing and/or straw bale barriers to be placed as necessary along the edge of construction activities leading to the drainage area to prevent particle laden runoff and wet soil sloughing from occurring outside of the construction area. Disturbed soils shall be revegetated as soon as possible with grass or other appropriate native vegetation. Revegetation shall be performed in a timely manner to avoid soil erosion from rain or wind. The applicant shall implement the approved BMP Plan.

Executive Summary, page ES-16, edits to mitigation measure Biology-13

Mitigation Measure Biology-13: Upon submittal of an improvement agreement and plan for the roadway, utility, and drainage improvements and/or building permits for individual building permits for construction of residences, the applicant or each individual lot owner shall submit a tree valuation report identifying the number of trees to be removed from the lot(s) and their value based on species, size, and condition for review and approval by the City Arborist. The report shall include detailed plans for the replacement of the removed trees. Trees must be replaced in kind and quantity to the satisfaction of the City Arborist. The applicant shall comply with the approved report, including implementation of tree replacement plan.

Executive Summary, page ES-17, edits to mitigation measure Cultural Resources-2

Mitigation Measure Cultural Resources-2: In the event that cultural materials are exposed or discovered during site preparation or subsurface construction activities, operations shall stop all work within 30 feet of the find and a qualified professional archaeologist would be contacted for evaluation and further recommendations. If a discovery is determined to be a historical or unique archaeological resource, and if avoidance of the resource is not possible, the archaeological or cultural resource consultant shall prepare and implement a Cultural Resources Management Plan acceptable to the City of Redwood City to treat the resource. Potential recommendations could include evaluation, collection, recordation, and analysis of any significant cultural materials followed by a professional report. The applicant shall comply with the approved Cultural Resources Management Plan.

Executive Summary, pages ES-18 through ES-20, edits to mitigation measure Geology-1

Mitigation Measure Geology-1: All recommendations in the TRC Lowney (2007), Cornerstone Earth Group (2008), and Treadwell & Rollo (2008a and 2008b) geotechnical feasibility documents, included in Appendix E, shall be implemented to the extent feasible. These measures include the following:

a) All undocumented fills beneath pavement, driveway, or other hard-scape areas shall be removed down to native soil and replaced with compacted engineered fill.

b) All undocumented fills beneath proposed structures shall be removed down to native soil and replaced as compacted engineered fill, unless the structures are supported on drilled pier foundations, which derive support from the underlying native soils and bedrock.

c) All drilled pier foundations shall be designed for soil creep pressures.

d) Permanent drainage measures shall be installed on all lots to intercept surface water infiltration and migrating subsurface water and thus reduce the likelihood of soils becoming wet and unstable.

e) Drilled pier foundations shall be used for houses on sloping lots.
f) Detailed foundation explorations shall be performed for each lot during the design-level geotechnical investigation to collect site-specific data regarding slope creep, expansive soils, and serpentine rock.

g) Garage slabs on grade, driveways, walkways, sidewalks, and pavers shall have sufficient reinforcement and be supported on a layer of non-expansive fill.

h) All residences, retaining walls, and bio-retention basins shall be supported on drilled, cast-in-place, straight-shaft friction piers or similar construction. Consideration shall be given on a case-by-case basis to the need for extra steel reinforcement of the piers and grade beams, voids beneath grade beams to mitigate uplift distress to the structures, perimeter subdrains and moisture barriers, and construction precautions for concrete over-pours at the tops of the drilled piers.

i) Proper detailing of construction and control joints for concrete slabs shall be considered in the final design of sidewalks and patios in areas of expansive soils. For example, a construction joint with rebar dowels shall be provided when concrete slabs on grade meet the proposed perimeter foundation for the residence to minimize vertical offset from soil expansion or shrinkage.

j) A detailed creek bank evaluation shall be performed during the final geotechnical investigation once grading and improvement plans are available.

k) The design-level geotechnical investigation for Lot 13 and all lots along the downhill side of Laurel Way shall evaluate the potential for creek bank erosion or landsliding, and provide mitigation measures as appropriate.

l) All proposed structures and improvements shall be set back a minimum of 10 feet an appropriate distance from the top of the existing creek banks as determined by the City and per the requirements of Zoning Ordinance Section 32.12.

m) Consideration shall be given to biotechnical creek bank stabilization methods and limiting surface water runoff into the creek.

n) Install a subdrain system of perforated pipe and permeable drain rock or gravel as needed to mitigate potential springs that could occur during the winter. Subdrains shall be installed where seepage is observed, and a conceptual subdrain plan shall be prepared once grading plans have been finalized.

o) A geotechnical engineer shall be on site during or just following heavy rainstorms to evaluate and map the locations of springs on the site, and provide recommendations for mitigating the adverse impacts of springs or seeps, if necessary.

p) The shallow landslide area on Lots 14 and 15 shall be completely removed down to bedrock, and the grade rebuilt with a keyed and benched engineered buttress fill containing subdrains.

q) Further evaluation of the questionable landslide near the bottom of Lots 3 and 4 shall be performed during the design-level geotechnical investigations for Lots 1 through 4 to provide detailed recommendations for keyways, benching, and subdrains. The design-level geotechnical investigation shall determine whether mitigation is needed to reduce the potential for damage to the planned site improvements and the potential for adversely affecting neighboring properties.

r) The bottom of the bio-retention basins on Lots 5, 7, 8, 9, and 10 shall be lined with HDPE liner to limit water infiltration into the native soils below the permeable filter soils. A subdrain shall be installed above the HDPE liner to intercept the excess water and direct it to a suitable discharge point. The specific recommendations for the HDPE liner system and subdrains shall be presented in the design-level geotechnical report.

s) The outfall for the bio-retention basins shall release the discharge near the base of the seasonal creek and shall not be allowed to flow over the top of the creek banks.
t) Cut-off plugs consisting of controlled density fill about 2 feet wide and keyed into the native soils shall be installed at 25- to 50-foot intervals along all pipeline trenches and at the beginning, midpoints, and ends of the culvert and all 36-inch diameter detention pipes. Specific recommendations for the cut-off plugs shall be presented in the design-level geotechnical report.

u) All proposed structures shall be designed in accordance with the seismic design criteria of the 2001 Uniform 2010 California Building Code (UBC CBC) or other recent applicable building code.

v) Cut areas in serpentine and exposed fill slopes composed of serpentine rock shall be capped with asbestos free soil.

**Mitigation Measure Geology-2:** A design-level geotechnical investigation shall be completed for each lot and for the utility improvements on Laurel Way. The geotechnical investigation shall include:

a) Evaluation of the layout of proposed underground utilities, exterior hardscape, and retaining walls to evaluate whether surficial soil creep would impact these structures;

b) Detailed foundation surface and subsurface explorations performed for each lot during the design-level geotechnical investigation. Data from these investigations shall be used to generate foundation design criteria;

c) Consideration of the need for extra steel reinforcement of piers and grade beams, voids beneath grade beams to mitigate uplift distress to the structures, perimeter subdrains and moisture barriers, and measures implemented during construction precautions for to prevent concrete over-pours at the tops of the drilled piers; and

d) Consideration of impacts arising from drilling excavations of foundation elements, including drilled piers for foundations.

Recommendations in the design-level geotechnical investigation report shall be implemented to the extent feasible, as approved by Redwood City. The At a minimum, the recommendations shall include:

a) Recommendations for preventing soil creep and landslides mitigating slope instability during construction, if necessary, such as by utilizing temporary excavation support systems or grading controls;

b) Recommendations for grading of corrective grading measures to replace existing undocumented fill with engineered fill that replaces undocumented fill;

c) Recommendations to reduce impacts to utility lines facilities arising from differential movement related to expansive soils;

d) Recommendations to reduce impacts to shared hardscape (i.e., roadways and sidewalks) related to from expansive soils;

e) Recommendations to reduce impacts to the planned drainage improvements related to from expansive soils;

f) Recommendations to reduce the probability of landslide and soil creep after potential for post-construction slope instability in the vicinity of site improvements;

g) Recommendations for grading of any fill or replacement soils general site grading, including cuts, fills, and corrective grading measures; and

h) Recommendations for stabilizing slopes during the drilling of home sites by supporting the homes and any site retaining walls on drilled piers for foundations.
Executive Summary, page ES-22, edits to mitigation measure Hazards-1

Mitigation Measure Hazards-1: Prior to issuance of any grading permit, the project sponsor applicant shall submit a construction safety plan to the Redwood City Planning Department for review and approval. The purpose of the plan will be to minimize the exposure of the public and construction workers to potentially hazardous materials during all phases of project construction. The plan shall require implementing appropriate control methods and approval containment and spill-control practices (e.g., spill control plan) for construction chemicals and materials used and stored on site. The applicant shall implement the approved construction safety plan.

Executive Summary, page ES-23, edits to mitigation measure Hydrology-1

Mitigation Measure Hydrology-1: Prior to issuance of grading permits or approval of improvement plans, the applicant shall submit a detailed Erosion Control Plan (ECP) to the Director of Public Works of Redwood City for review and approval. The purpose of the ECP shall be to mitigate erosion and sedimentation impacts during the construction period. The applicant shall implement the approved ECP. The detailed ECP shall be accompanied by a written narrative and shall include, at a minimum, the following:

a) Proposed schedule of grading activities, monitoring, and infrastructure milestones in chronological format
b) Identification of critical areas of high erodibility potential and/or unstable slopes
c) Use of soil stabilization techniques such as short-term biodegradable erosion control blankets and hydroseeding. Silt fences shall be installed downslope of all graded slopes. Straw wattles or another appropriate BMP shall be installed in the flow path of graded areas receiving concentrated flows, as well as around storm drain inlets
d) Description of erosion control measures on slopes, lots, and streets
e) Contour and spot elevations indicating runoff patterns before and after grading
f) Filter systems at catch basins (drop inlets) in private public streets as a means of sediment control
g) Post-construction inspection of all drainage facilities for accumulated sediment, and the clearing of these drainage structures of debris and sediment

Executive Summary, page ES-24, edits to mitigation measure Hydrology-3

Mitigation Measure Hydrology-3: Prior to issuance of any grading permit, the applicant shall submit a long-term Stormwater Pollution Prevention Plan (SWPPP) to the City Engineer for Redwood City for review and approval. The purpose of this SWPPP shall be to protect storm water quality after the construction period. The applicant shall implement the approved SWPPP. The SWPPP shall include the following additional BMPs to protect storm water quality:

a) Proper maintenance of paved areas can eliminate the majority of litter and debris washing into storm drains and entering local waterways. Regular sweeping is a simple and effective BMP aimed at reducing the amount of litter in storm drain inlets (to prevent clogging) and public waterways (for water quality). The Homeowners Association shall enter into an agreement with the City of Redwood City or other street sweeping contractor to ensure this maintenance is completed.

b) Proper maintenance of filtration systems is necessary to ensure their effectiveness. Filtration systems shall be maintained according to manufacturer’s instructions. A maintenance schedule and homeowner maintenance agreement shall be submitted to the City Engineer for Redwood City prior to construction.
c) The applicant shall prepare informational literature and guidance on residential BMPs to minimize pollutant contributions from the proposed development. The information shall be distributed to all future residents at the project site by the Homeowners Association. At a minimum, the information shall discuss the following topics:

1) Proper disposal of household and commercial chemicals
2) Proper use of landscaping chemicals
3) Clean-up and appropriate disposal of yard cuttings and leaf litter
4) Prohibition of any washing and dumping of materials and chemicals into storm drains
5) Proper maintenance of bioswales and a discussion of why the bioswales are in place and how they are important to maintaining the project site

Executive Summary, page ES-25, edits to mitigation measures Hydrology-4 and Hydrology-5

Mitigation Measure Hydrology-4: The Homeowners Association applicant shall be responsible for proper maintenance of drainage structures, filtration units, and equipment on the project site.

Mitigation Measure Hydrology-5: The applicant or its contractor shall prepare a Spill Contingency and Countermeasures Plan (SCCP) that describes prevention measures and response measures for spills of hazardous materials. The SCCP shall be submitted for the review and approval of the Regional Water Quality Control Board. The applicant shall implement the approved SCCP. At a minimum, the SCCP shall include:

a) Written descriptions of any spills occurring within the past year, corrective actions taken, and plans for preventing their reoccurrence.

b) A prediction of the direction, rate of flow, and total quantity of hazardous materials that could be discharged where experience indicates a potential for equipment failure.

c) A description of containment and/or diversionary structures or equipment to prevent discharged hazardous materials from reaching navigable waters, such as dikes, berms, or retaining walls; curbing; culverting, gutters, or other drainage systems; weirs, booms, or other barriers; spill diversion ponds; retention ponds; sorbent materials.

d) Where appropriate, a demonstration that containment and/or diversionary structures or equipment are not practical and a strong hazardous materials spill contingency plan and a written commitment of manpower, equipment, and materials to quickly control and remove spilled materials.

e) A complete discussion of the spill prevention and control measures applicable to the project site.

Executive Summary, page ES-26, edits to mitigation measure Hydrology-7

Mitigation Measure Hydrology-7: Prior to recordation of the Final Map, the applicant shall submit to the City Engineer of Redwood City for review and approval a plan to mitigate increases in peak discharge such that post construction peak discharge does not exceed to less than 5% of preconstruction peak discharge by more than 5%. All drainage improvements shall be constructed in accordance with Redwood City's Storm Drain Design Criteria (Engineering Standards Volume 3, Part V). The applicant shall confer with the City Engineer prior to the preparation of the plan for the purpose of receiving specific direction on the plan and what would be acceptable to the City. The applicant shall implement the
approved plan to mitigate increases in peak discharge. Design elements in the plan could include:

a) Reconfiguration and/or redesign of bioretention swales;

b) Reconfiguration and/or redesign of detention pipelines or basins; and

c) Addition of detention tanks.

Executive Summary, page ES-31, edits to mitigation measures Public Services and Utilities-1 through -4

**Mitigation Measure Public Services and Utilities-1:** The applicant shall prepare a sewer main capacity analysis for the review and approval of the Emerald Lake Heights Sewer Maintenance District for the 10 new residences proposed to connect to the District’s sanitary sewer mains. This sewer analysis will evaluate the condition of the existing sewer lines and their capacity to accept the additional flow that would be generated by the new residences. The applicant shall also apply for and obtain annexation to the District prior to approval of any new sewer connections with the District. These new sewer connections must be approved and constructed prior to issuance of building permits for any of the 10 new residences that would be located within the Emerald Lake Heights Sewer Maintenance District.

**Mitigation Measure Public Services and Utilities-12:** Prior to building permit issuance, the applicant shall perform an engineering study to determine whether sufficient water supply would be available to the project to meet the minimum firefighting requirements of the Fire Department. The engineering study shall be submitted for the review and approval of the Building and Engineering Departments, as well as the Fire Department. If it is determined that sufficient water supply is not available for the proposed project, then the study shall outline the infrastructure improvements that would be necessary in order to achieve the Fire Department’s minimum water supply requirements. The plans for infrastructure improvements, if required, shall be submitted for the review and approval of the Building and Engineering Departments and the Fire Department. The applicant shall be responsible for the construction and cost of infrastructure improvements.

**Mitigation Measure Public Services and Utilities-23:** The applicant shall notify the owners of the existing homes on Laurel Way at least one month prior to utility interruption caused by the disconnection and reconnection of electric, telephone, cable TV, water, and natural gas service. An additional reminder notice shall be given 48 hours in advance of the disconnection. If the interruption to electric service will last longer than two hours, then the developer shall be responsible for providing temporary power to the two existing residences. The applicant shall make all reasonable efforts to minimize the interruption of utility service to these two residences.

**Mitigation Measure Public Services and Utilities-34:** The applicant shall work with local solid waste collection services to establish a trash and recycling waste collection service for the project site. If available, this collection service shall also include composting bins and/or yard waste collection and recycling.

**Mitigation Measure Public Services and Utilities-45:** The applicant shall comply with all water conservation techniques included in the PD statement, including:

a) Landscaping shall emphasize native trees, grasses, and drought tolerant vegetation;

b) Residences shall use recirculating hot water/structured plumbing systems; and

c) Residences shall use home resource monitoring systems for use of water, electricity, and gas.
Executive Summary, page ES-29, edits to mitigation measure Traffic-4

Mitigation Measure Traffic-4: The applicant shall submit a Development Agreement for the review and approval of the City of Redwood City that would require a limit of no more than four individual homes may be under construction during any one-two year period. Individual lot owners shall agree to build their homes on a staggered construction schedule such that all 18 residences can be built and completed within the allowable construction window. The Development Agreement shall allow for an 8-year construction window with the option for a one-time, one year extension.

Executive Summary, page ES-32, edits to mitigation measure Traffic-5

Mitigation Measure Traffic-5: A stop sign and painted stop bar shall be installed at the end of Laurel Way at Highland Avenue per City standards prior to commencement of Phase I construction activities. Any signage shall be installed in such a way that ensures unobstructed views to drivers.

Executive Summary, page ES-33, edits to mitigation measure Traffic-7

Mitigation Measure Traffic-7: Appropriate access shall be maintained for the existing Laurel Way residences during all phases of the proposed project. Adequate access for trucks, including fire trucks and emergency vehicles, shall be maintained at all times. No parking shall be allowed on Laurel Way (paved or unpaved portions) for construction vehicles or for the residents of the proposed residences until the infrastructure parking places are provided. Once the on street parking spaces are completed in Phase I, construction vehicles and residents may park in these on street parking spaces. At no time during project construction shall construction vehicles and equipment be parked or staged on the currently paved portion of Laurel Way, or on Highland Avenue. Construction vehicle parking and construction equipment and material staging shall be maintained on the subject lots to the extent feasible throughout the Phase I and Phase II construction process.

Executive Summary, page ES-33, edits to mitigation measure GHG-1

Mitigation Measure GHG-1: To the extent feasible, The applicant shall be responsible for ensuring that construction workers living outside San Mateo County shall meet at staging areas and be transported (in carpools) to jobsites. The intent of this measure is to reduce the number of daily vehicle trips required to bring construction workers to and from the job site, and to reduce the construction parking demand at the job site.

Section 2, Project Description, pages 2-2 and 2-4, paragraph starting at the bottom of page 2-2

The subject property is located at the end of Laurel Way in the Emerald Hills neighborhood of Redwood City (see Figure 2.3-1) and totals approximately 5.1 acres. The hillside parcels on the project site range in size from between approximately 7,200 to 14,200 square feet, which is similar to the majority of parcel sizes found elsewhere in the general neighborhood.

The neighborhood is substantially built out with single-family dwellings. Based on assessor’s parcel number (APN) information obtained from the County Assessor’s Office, as well as information obtained from title reports, the existing residences in the area range in size from approximately 1,160 1,300 1,000 to 4,250 7,700 4,000 square feet, and average approximately 2,643 3,964 2,141 square feet in size (including two-car garages). A table showing the addresses...
and residence sizes of the existing homes in the project vicinity is included in Appendix C of the Final EIR.

The applicant has submitted a separate list of residence sizes, which has been included as Appendix D of the Final EIR. This list includes hillside residences in Redwood City that were sold in the first quarter of 2010, and includes hillside properties throughout the City and not just those in proximity to the subject property. The applicant has sorted these residences by the decade of their construction to demonstrate that residence sizes in the city have increased over time. The list provided by the applicant does not include garages, so an estimated value of 420 square feet has been added to the numbers listed below to reflect the average outside dimensions of a two-car garage:

- Pre 1960s: 2,170 square feet
- 1960s: 2,507 square feet
- 1970s: 2,479 square feet
- 1980s: 3,293 square feet
- 1990s: 3,458 square feet
- 2000s: 3,451 square feet

Most of the nearby residential development is also located on hillsides of various slopes. Figures 2.3-2 and 2.3-3 show the topography and relative steepness of the slopes in the vicinity of the project site. The topography shown in these two figures is an approximation of natural grade prior to residential development.

Section 2, Project Description, page 2-4, second full paragraph

Laurel Way is currently a dead-end street that is developed with approximately 14 residences and three undeveloped parcels along the paved portion of its one-half mile length. The City of Redwood City has not accepted any portion of Laurel Way as dedication to the City, and therefore the property owners on Laurel Way have the responsibility for the maintenance of the roadway. The public street portion of Laurel Way owned by the City of Redwood City terminates in front of the developed lot at 3725 Laurel Way. The remaining paved portion of Laurel Way is approximately 270 feet long, and has not been accepted for dedication by the City of Redwood City. The owners of the four properties that front onto this private portion of Laurel Way are responsible for the maintenance of this paved portion of the roadway. None of the developed parcels fronting onto either the public or private paved portions of Laurel Way are part of the project area.

Section 2, Project Description, pages 2-17 and 2-18, final paragraph on page 2-17

A total of 179 mature trees currently exist on the lot. A mature tree is defined by Section 35.1 of the City of Redwood City Municipal Code as:

A. Any woody plant characterized by having a single trunk of a circumference of thirty-eight inches (38") or more, measured at any point between six inches (6") and thirty-six inches (36") above ground level; or

B. Any woody plant characterized by having a single trunk which has been found by the Park and Recreation Commission to have special significance to the community, which plant shall be designated a "heritage tree."

A total of 90 mature trees with a trunk diameter of 12 inches or more would be removed as part of the project, with the remaining 89 existing mature trees being protected and maintained. An estimated 47 trees would be removed as part of Phase I grading and construction activities.
and 43-45 trees would be removed as part of the construction of the 16-18 proposed residences in Phase II (Ralph Osterling Inc. 2008). The trees that would be removed in Phases I and II are listed in the arborist report provided by the applicant, and included in Appendix E. The project arborist has concluded that the majority of the trees to be removed are in fair to poor condition (Ralph Osterling Inc. 2008). This report has been peer reviewed by the City Arborist.

Section 3.1, Aesthetics, page 3.1-1, second paragraph

The project site is located adjacent to the Emerald Hills hillside neighborhood of the City of Redwood City. The neighborhood is substantially built out with single-family dwellings on hillsides of various slopes. The residences in the area are a mix of single- and multi-story residences. Based on assessor’s parcel number (APN) information obtained from the County Assessor’s Office, the existing residences in the area range in size from approximately 1,160-1,300-1,000 to 4,250-7,700-4,000 square feet, and average approximately 2,643-3,964-2,144 square feet in size (including two-car garages).

Section 3.1, Aesthetics, page 3.1-3, second paragraph

The City of Redwood City General Plan (Redwood City 1990-2010) Open Space and Conservation Elements’ policies relevant to aesthetics are listed below.

Section 3.1, Aesthetics, page 3.1-4, fourth paragraph

Residences. The specific sequencing and timing of the construction of the proposed 16-18 residences is unknown at this time. Construction of the residences could happen at any time throughout the five-year construction window proposed in the applicant’s draft Development Agreement (8-year approval window with the opportunity for a one-time, 1-year extension), with a maximum limit of four 6-residences under construction in any one- to two-year period. The analysis in this EIR assumes a worst-case scenario for construction timing in order to ensure a comprehensive analysis. The worst-case scenario for construction impacts on aesthetics assumes that the residential construction would be distributed throughout the available 9-five years. Having the work distributed throughout the 9-five years would aesthetically be the worst-case scenario because it would cause the presence of construction equipment and activities to become a long-term visual impact.

Section 3.1, Aesthetics, page 3.1-7

Mitigation Measure Aesthetics-1: The applicant shall submit a detailed landscaping plan for the review and approval of the City of Redwood City Planning Division and the City Arborist prior to issuance of building permits for each new residence. The landscaping plan shall indicate how the proposed landscaping shall screen the bulk of the residence from view from the surrounding neighborhood. The landscaping plan shall also indicate how the proposed landscaping replaces the existing brush and landscaping that would be removed for the construction of Phases I and II. The applicant shall construct/install all improvements shown on the approved plans.

Section 3.1, Aesthetics, page 3.1-8

Mitigation Measure Aesthetics-2: The applicant shall submit a street lighting and light fixture plan to the City of Redwood City Planning Department Division depicting rural style street lighting for night time safety of the new residents. This plan shall be reviewed and approved prior to the issuance of permits for the construction of Phase I of the project construction. The plan shall include the use of shielded light fixtures that direct light downward, prevent direct glare to nearby residences, and otherwise minimize lighting
impacts on residential properties. The applicant shall construct/install all improvements shown on the approved plans.

Section 3.1, Aesthetics, page 3.1-8

Mitigation Measure Aesthetics-3: The applicant shall submit a detailed landscaping plan for the review and approval of the City of Redwood City Planning Division and the City Arborist prior to issuance of building permits for construction of Phase I. The landscaping plan shall indicate how the proposed landscaping shall screen the new night time street lighting from adjacent properties. The applicant shall construct/install all improvements shown on the approved plans.

Mitigation Measure Aesthetics-4: The applicant shall submit a detailed landscaping plan for the review and approval of the City of Redwood City Planning Division and the City Arborist prior to issuance of building permits for each new residence. The landscaping plan shall indicate how the proposed landscaping shall screen the new night time lighting from adjacent properties. The applicant shall construct/install all improvements shown on the approved plans.

Section 3.2, Air Quality, page 3.2-6, second full paragraph

The City of Redwood City General Plan (1990-2010) Land Use and Conservation Elements’ policies relevant to air quality are listed below.

Section 3.2, Air Quality, pages 3.2-7 and 3.2-8

Recommended Measure Air Quality-1: The following control measures from the BAAQMD CEQA Air Quality Guidelines 2009, Table 8-2, shall be implemented in order to reduce air pollutant emissions during project construction:

- a) Water all exposed surfaces (e.g. parking areas, staging areas, soil piles, graded areas, and unpaved access roads) at least twice daily.
- b) Cover all trucks hauling soil, sand, and other loose materials offsite.
- c) Remove all visible mud or dirt track-out onto adjacent public roads using wet power vacuum street sweepers at least once per day. Dry power sweeping would not be allowed.
- d) Limit vehicle speeds on upaved roads to 15 mph.
- e) Complete paving of roadways, driveways, and sidewalks as soon as possible. Lay building pads as soon as possible after grading unless seeding or soil binders are used.
- f) Minimize idling times either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California air toxics control measure Title 13, Section 2485 of California Code of Regulations). Provide clear signage for construction workers at all access points.
- g) Maintain and properly tune all construction equipment in accordance with manufacturer’s specifications. A certified mechanic shall check all equipment prior to operation to determine it is in proper condition.
- h) Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours of any complaints. The Air District’s phone number shall also be visible to ensure compliance with applicable regulations.
Section 3.3, Biological Resources, page 3.3-1, final paragraph

An Arborist Tree Assessment Report was completed in April 2007 (Ralph Osterling Consultants Inc. 2007). A total of 158 mature trees (as defined by Section 35.1 of the City of Redwood City Municipal Code) of 12 inches or greater trunk diameter in the developable area of the project site were assessed for species, condition, and size within the proposed project area. The tree species included:

Section 3.3, Biological Resources, pages 3.3-4, next to last paragraph

**Heritage Trees.** A total of 91 mature trees (as defined by Section 35.1 of the City of Redwood City Municipal Code) with a trunk diameter of 12 inches or more have been identified for removal during the Phase I (47 trees for roadway and utility improvements) and Phase II (43 trees identified for house construction) project construction activities (Ralph Osterling Inc. 2008). All but two of these trees (one elm and one Monterey pine) are indigenous and are classified as “Heritage Trees”. The definition of Heritage Tree is located in the Regulatory Setting (Section 3.3.2). The number of trees to be removed in each condition class for each phase is shown in Table 3.3-3, below. All of the trees proposed for removal range from very poor to fair condition, with 63 percent of the trees to be removed in Phase I of average or fair condition, and 53 percent of the trees to be removed in Phase II of average or fair condition. Deteriorating conditions such as trunk rot and significant leans were observed in many of these trees. A detailed inventory of all trees surveyed can be found in Appendix E.

Section 3.3, Biological Resources, pages 3.3-12, fifth full paragraph

The City of Redwood City General Plan (Redwood City 1990-2010) Open Space and Conservation Elements’ policies relevant to biological resources are listed below.

Section 3.3, Biological Resources, pages 3.3-13, first paragraph

The City of Redwood City has regulations protecting large trees. These regulations are contained in Section 35 of the Municipal Code, with Section 35.1 defining the size of a mature tree, Section 35.2 defining the requirements for heritage trees, and Section 35.3 addressing tree removal permit authority. A “tree” is any live woody plant rising above the ground with a single stem or trunk of a circumference of thirty-eight inches (or 12 inches in diameter) at the largest point between 6 and 36 inches above ground level. “Heritage Trees”, also protected by the City of Redwood City, include those specific trees or groves of trees of any size that have historical significance, are indigenous to the area, or comprise a group of trees that are dependent on one another for survival. A permit is required for the removal of the City of Redwood City’s definition of either a “tree” or a “Heritage Tree.”

Section 3.3, Biological Resources, pages 3.3-15 and 3.3-16

**Mitigation Measure Biology-4:** Covenants, Codes, and Restrictions (CC&Rs) shall be developed by the applicant in coordination with appropriate Redwood City staff and a qualified biologist, and USEWS staff in compliance with USFWS and CDFG regulations, to minimize the biological resource impacts of post-development land use and alteration, landscaping activities, and property-owner pesticide and/or biocide use during and after project development.

**Mitigation Measure Biology-6:** The applicant shall propose and incorporate a vegetation maintenance plan for the existing and proposed replacement trees and vegetation located along the private road portion of Laurel Way prior to the issuance of any permits for the

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The construction of Phase I of the project. The vegetation maintenance plan shall describe measures for the protection and preservation of existing and proposed replacement trees and vegetation in perpetuity, including provisions for the planting of new trees and vegetation to replace any future loss of existing or replacement trees and vegetation. The vegetation maintenance plan shall be submitted for the review and approval of the City Arborist. The applicant shall implement the approved vegetation maintenance plan.

Section 3.3, Biological Resources, pages 3.3-17

**Mitigation Measure Biology-8:** The applicant shall obtain all necessary permits pertaining to affected Waters of the United States regulated by the U.S. Army Corps of Engineers, California Department of Fish and Game, and San Francisco Bay Regional Water Quality Control Board. Discharge of fill into Waters of the United States will require a Clean Water Act Section 404 permit from the U.S. Army Corps of Engineers and Clean Water Act Section 401 certification from the San Francisco Bay Regional Water Quality Control Board. The applicant shall comply with all conditions in the approved permits at all times. The permitting process will likely require compensation for impacts to wetlands. Compensation could include purchase of mitigation credits for the affected habitat types at an established mitigation bank, preservation and enhancement of in-kind habitat types, or creation and preservation of in-kind habitat types.

Section 3.3, Biological Resources, pages 3.3-17

**Mitigation Measure Biology-10:** A Best Management Practices (BMPs) Plan shall be developed and put in place prior to the initiation of project activities. The BMP Plan shall be submitted for the review and approval by City staff prior to the issuance of any permits for the construction of Phase I of the project. The BMPs shall include silt fencing and/or straw bale barriers to be placed as necessary along the edge of construction activities leading to the drainage area to prevent particle laden runoff and wet soil sloughing from occurring outside of the construction area. Disturbed soils shall be revegetated as soon as possible with grass or other appropriate native vegetation. Revegetation shall be performed in a timely manner to avoid soil erosion from rain or wind. The applicant shall implement the approved BMP Plan.

Section 3.3, Biological Resources, page 3.3-19, first sentence in the final paragraph followed by a new paragraph

A total of 91 mature trees (as defined by Section 35.1 of the City of Redwood City Municipal Code) with a trunk diameter of 12 inches or more are proposed to be removed, including 47 trees during Phase I (roadway and utility construction) and 44 trees during Phase II (residential construction) (Ralph Osterling Inc. 2008). The trees to be removed range in health from very poor to fair condition, as shown in Table 3.3-3, and are all located immediately in the path of planned development. A total of 88 existing mature trees would be maintained on the project site and protected throughout the construction of the project. Approximately 100 oak trees would be planted at the end of Phase I as replacement trees, and would be planted along the frontages of the 18 lots and along the side property lines as vegetative screening. Approximately 28 western redbud trees (Cercis occidentalis) and vine maple trees (Acer circinatum) would be planted in the five proposed bio-swales. All replacement trees would be of 15 gallon size at a minimum and planted prior to the completion of Phase I. The replacement tree ratio for the proposed project is 1.4:1.

The City Arborist has reviewed the arborist report prepared for the project and requested appraised values for all trees to be removed from the site. Mitigation measure Biology-13 would require the appraised value of all trees to be removed from the site. The mitigation measure also...
requires that trees be replaced in kind and quality to the satisfaction of the City Arborist. Implementation of mitigation measure Biology-13 would ensure compliance with the City’s tree replacement policies.

Section 3.3, Biological Resources, page 3.3-20

Mitigation Measure Biology-13: Upon submittal of an improvement agreement and plan for the roadway, utility, and drainage improvements and/or building permits for individual building permits for construction of residences, the applicant or each individual lot owner shall submit a tree valuation report identifying the number of trees to be removed from the lot(s) and their value based on species, size, and condition for review and approval by the City Arborist. The report shall include detailed plans for the replacement of the removed trees. Trees must be replaced in kind and quantity to the satisfaction of the City Arborist. The applicant shall comply with the approved report, including implementation of the tree replacement plan.

Section 3.3, Biological Resources, page 3.3-21, revision to mitigation measure Biology-16

Mitigation Measure Biology-16: The applicant shall add provisions within the CC&Rs for the replacement of trees, vegetation, and/or landscaping if said elements fail to survive. Replacement of trees, vegetation, or landscaping shall be in kind, both in quality and quantity, and shall be installed within 90 days of the death of the previous vegetation.

Section 3.4, Cultural Resources, page 3.4-5, fourth paragraph

The City of Redwood City General Plan (Redwood City 1990-2010) Historical Resource Element does not have any goals relevant to the cultural resources of the proposed project.

Section 3.4, Cultural Resources, page 3.4-7

Mitigation Measure Cultural Resources-2: In the event that cultural materials are exposed or discovered during site preparation or subsurface construction activities, operations shall stop all work within 30 feet of the find and a qualified professional archaeologist would be contacted for evaluation and further recommendations. If a discovery is determined to be a historical or unique archaeological resource, and if avoidance of the resource is not possible, the archaeological or cultural resource consultant shall prepare and implement a Cultural Resources Management Plan acceptable to the City of Redwood City to treat the resource. Potential recommendations could include evaluation, collection, recordation, and analysis of any significant cultural materials followed by a professional report. The applicant shall comply the approved Cultural Resources Management Plan.

Section 3.5, Geology and Soils, page 3.5-2, third full paragraph

Serpentinite has been mapped on the lots south of Laurel Way, and was encountered in boreholes drilled on Lots 1, 2, 3, and 18. Serpentinite from boreholes from the northern portion of the project area have been interpreted as part of a fault-bound wedge in Franciscan complex sheared rock. Serpentinite in the southern portion of the project area has been interpreted as part of a larger body of serpentinite to the south of the project area (TRC Lowney 2007). Surficial deposits overlay the Franciscan and serpentinite bedrock in the project area. The surficial deposits consist of landslide debris, colluvium, alluvium, and artificial fill. They cover the entire site except for the two small bedrock outcrop areas previously identified (TRC Lowney 2007).
Section 3.5, Geology and Soils, page 3.5-7, new paragraph inserted after seventh full paragraph

Several geotechnical reports have been prepared for the project to analyze the project site and determine the presence and location of any landslide hazards on the site. These geotechnical reports are all included in Appendix E of the Draft EIR. A supplemental geotechnical report was prepared by Cornerstone Earth Group (Cornerstone) on January 22, 2012 and is included in Appendix H of the Revised Final EIR. The Cornerstone report includes the results of site reconnaissance performed in 2011 and concludes that the site conditions were similar to the conditions observed in the previous geotechnical reports prepared in 2007 and 2008. The 2011 site reconnaissance revealed no evidence of further movement of the previously mapped landslides, drainage channel scour, or settlement of the fill wedge along the outboard edge of the existing unimproved road, nor did the site reconnaissance identify any additional locations of existing or potential landslides.

The one change on the project site identified in the 2012 Cornerstone report is that a previously identified soil movement has been partially filled in with pieces of concrete rip rap and that a small catch basin with a discharge pipe has been installed. This soil movement location is within Lot 12 along the outboard edge of the unimproved road and near the existing culvert discharge point. The installation of this concrete rip rap and catch basin was reportedly not performed by any member of the Laurel Way Joint Venture Group.

The 2012 Cornerstone report also identifies several small geologic details that were not identified or plotted in previous reports. These small geologic details are shown in Figure 1 of the 2012 Cornerstone report and include:

- Additional rock outcrops
- A collection of additional bedrock structural details
- Plotting previously identified small scale erosion and fill settlement failures along the drainage swale
- Plotting areas of previously observed seepage
- Extending the mapping of a previously identified small potential landslide downhill of Lots 16 and 17 of Block 18

Section 3.5, Geology and Soils, page 3.5-9, second full paragraph

The 2007 California Building Code (CBC) is based on the 2006 International Building Code with the addition of more extensive structural seismic provisions. The CBC was adopted by the California Building Standards Commission and became effective January 1, 2008. The CBC is contained in the Title 24 of the California Code of Regulations, California Building Standards Code, and is a compilation of three types of building standards from three different origins:

Section 3.5, Geology and Soils, page 3.5-9, last full paragraph

The City of Redwood City General Plan (Redwood City 1990) Open Space, Conservation, and Safety Elements' policies relevant to geology, soils, and minerals of the proposed project are listed below.

Section 3.5, Geology and Soils, pages 3.5-11 and 3.5-12

Mitigation Measure Geology-1: All recommendations in the TRC Lowney (2007), Cornerstone Earth Group (2008), and Treadwell & Rollo (2008a and 2008b) geotechnical reports for this project.

1 Cornerstone Earth Group was formerly known as TRC/Lowney, and is the same firm that performed several of the 2007 and 2008 geotechnical reports for this project.
feasibility documents, included in Appendix E, shall be implemented to the extent feasible. These measures include the following:

a) All undocumented fills beneath pavement, driveway, or other hard-scape areas shall be removed down to native soil and replaced with compacted engineered fill.

b) All undocumented fills beneath proposed structures shall be removed down to native soil and replaced as compacted engineered fill, unless the structures are supported on drilled pier foundations, which derive support from the underlying native soils and bedrock.

c) All drilled pier foundations shall be designed for soil creep pressures.

d) Permanent drainage measures shall be installed on all lots to intercept surface water infiltration and migrating subsurface water and thus reduce the likelihood of soils becoming wet and unstable.

e) Drilled pier foundations shall be used for houses on sloping lots.

f) Detailed foundation explorations shall be performed for each lot during the design-level geotechnical investigation to collect site-specific data regarding slope creep, expansive soils, and serpentinite rock.

g) Garage slabs on grade, driveways, walkways, sidewalks, and pavers shall have sufficient reinforcement and be supported on a layer of non-expansive fill.

h) All residences, retaining walls, and bio-retention basins shall be supported on drilled, cast-in-place, straight-shaft friction piers or similar construction. Consideration shall be given on a case-by-case basis to the need for extra steel reinforcement of the piers and grade beams, voids beneath grade beams to mitigate uplift distress to the structures, perimeter subdrains and moisture barriers, and construction precautions for concrete over-pours at the tops of the drilled piers.

i) Proper detailing of construction and control joints for concrete slabs shall be considered in the final design of sidewalks and patios in areas of expansive soils. For example, a construction joint with rebar dowels shall may be provided when concrete slabs on grade meet the proposed perimeter foundation for the residence to minimize vertical offset from soil expansion or shrinkage.

j) A detailed creek bank evaluation shall be performed during the final geotechnical investigation once grading and improvement plans are available.

k) The design-level geotechnical investigation for Lot 13 and all lots along the downhill side of Laurel Way shall evaluate the potential for creek bank erosion or landsliding, and provide mitigation measures as appropriate.

l) All proposed structures and improvements shall be set back a minimum of 10 feet, an appropriate distance from the top of the existing creek banks as determined by the City and per the requirements of Zoning Ordinance Section 32.12.

m) Consideration shall be given to biotechnical creek bank stabilization methods and limiting surface water runoff into the creek.

n) Install a subdrain system of perforated pipe and permeable drain rock or gravel as needed to mitigate potential springs that could occur during the winter. Subdrains shall be installed where seepage is observed, and a conceptual subdrain plan shall be prepared once grading plans have been finalized.

o) A geotechnical engineer shall be on site during or just following heavy rainstorms to evaluate and map the locations of springs on the site, and provide recommendations for mitigating the adverse impacts of springs or seeps, if necessary.

p) The shallow landslide area on Lots 14 and 15 shall be completely removed down to bedrock, and the grade rebuilt with a keyed and benched engineered buttress fill containing subdrains.
Further evaluation of the questionable landslide near the bottom of Lots 3 and 4 shall be performed during the design-level geotechnical investigations for Lots 1 through 4 to provide detailed recommendations for keyways, benching, and subdrains. The design-level geotechnical investigation shall determine whether mitigation is needed to reduce the potential for damage to the planned site improvements and the potential for adversely affecting neighboring properties.

The bottom of the bio-retention basins on Lots 5, 7, 8, 9, and 10 shall be lined with HDPE liner to limit water infiltration into the native soils below the permeable filter soils. A subdrain shall be installed above the HDPE liner to intercept the excess water and direct it to a suitable discharge point. The specific recommendations for the HDPE liner system and subdrains shall be presented in the design-level geotechnical report.

The outfall for the bio-retention basins shall release the discharge near the base of the seasonal creek and shall not be allowed to flow over the top of the creek banks.

Cut-off plugs consisting of controlled density fill about 2 feet wide and keyed into the native soils shall be installed at 25- to 50-foot intervals along all pipeline trenches and at the beginning, midpoints, and ends of the culvert and all 36-inch diameter detention pipes. Specific recommendations for the cut-off plugs shall be presented in the design-level geotechnical report.

All proposed structures shall be designed in accordance with the seismic design criteria of the 2001 Uniform California Building Code (UBC) or other recent applicable building code.

Cut areas in serpentinite and exposed fill slopes composed of serpentinite rock shall be capped with asbestos free soil.

Section 3.5, Geology and Soils, page 3.5-13, new and replacement text inserted after the partial paragraph at the top of the page

The supplemental geotechnical report prepared by Cornerstone in 2012 indicates that there have not been any significant changes in the geologic conditions on the project site between those observed and documented in the 2007 and 2008 geotechnical reports and the 2011 site reconnaissance performed by Cornerstone. The 2012 Cornerstone report also addresses the relationship between tree roots and slope stability, stating that the contribution, if any, that tree roots may provide to slope stability is not predictable or quantifiable and is therefore not considered in slope stability analyses. The report further states that more important factors are modeled to evaluate the stability of a hillside, such as soil and bedrock shear strength, ground water conditions, and geologic conditions like bedrock dip and structure. The 2012 Cornerstone report concludes that the recommendations made in the previous geotechnical reports are still applicable to the proposed project and that no modifications or additions to these recommendations are necessary. The City Geologist has reviewed the 2012 Cornerstone report and concurs with the conclusions in that report.

Mitigation Measure Geology-2: A design-level geotechnical investigation shall be completed for each lot and for the utility improvements on Laurel Way. The geotechnical investigation shall include:

a) Evaluation of the layout of proposed underground utilities, exterior hardscape, and retaining walls to evaluate whether surficial soil creep would impact these structures;

b) Detailed foundation surface and subsurface explorations performed for each lot during the design-level geotechnical investigation. Data from these investigations shall be used to generate foundation design criteria;

c) Consideration of the need for extra steel reinforcement of piers and grade beams, voids beneath grade beams to mitigate uplift distress to the structures, perimeter
subdrains and moisture barriers, and measures implemented during construction precautions for to prevent concrete over-pours at the tops of the drilled piers; and

d) Consideration of impacts arising from drilling excavations of foundation elements, including drilled piers for foundations.

Recommendations in the design-level geotechnical investigation report shall be implemented to the extent feasible, as approved by Redwood City. The at a minimum, the recommendations shall include:

a) Recommendations for preventing soil creep and landslides mitigating slope instability during construction, if necessary, such as by utilizing temporary excavation support systems or grading controls;

b) Recommendations for grading of corrective grading measures to replace existing undocumented fill with engineered fill that replaces undocumented fill;

c) Recommendations to reduce impacts to utility lines facilities arising from differential movement related to expansive soils;

d) Recommendations to reduce impacts to shared hardscape (i.e., roadways and sidewalks) related to expansive soils;

e) Recommendations to reduce impacts to the planned drainage improvements related to expansive soils;

f) Recommendations to reduce the probability of landslide and soil creep after potential for post-construction slope instability in the vicinity of site improvements;

g) Recommendations for grading of any fill or replacement soils general site grading, including cuts, fills, and corrective grading measures; and

h) Recommendations for stabilizing slopes during the drilling of home sites by supporting the homes and any site retaining walls on drilled piers for foundations.

Section 3.5, Geology and Soils, page 3.5-13, first full paragraph

Utility Improvements. Trenching for utility improvements would not significantly destabilize slopes as the trenching would occur mostly in the improved roadway. Additional trenching would extend a short distance (approximately 20 feet) into each lot for connection to stub out the utility improvements. Impacts would be less than significant with the implementation of mitigation measures Geology-1 and Geology-2 related to grading would be implemented during excavation and construction for all utilities, and would reduce potential impacts to a less than significant level.

Section 3.5, Geology and Soils, page 3.5-14, first and second paragraphs

Phase II – Residential Development – Residences. The excavation required for constructing residences has the potential to cause soil creep or landslides slope instability. Impacts would be less than significant with the implementation of mitigation measure Geology-2, which requires a geotechnical report that would evaluate the need for temporary excavation support systems and the potential impacts that drilling of pier foundations would have on soil stability.

Tree Removal and Landscaping Plan. Removal of the remaining mature trees proposed for removal as part of Phase II could reduce the strength of the slope because tree roots stabilize slopes and also remove water from slope soils. All proposed replacement trees would be planted at the end of Phase I. The new tree roots would take time to reestablish themselves. Residential construction and associated tree removal and landscaping would be performed over the course of approximately 5 years (or perhaps longer if the City adopts a development agreement with the applicant), which would allow the replacement trees time to expand their root systems and begin to further stabilize the hillside. However, the root systems of the replacement trees would require
longer than 5 years to replace the existing mature root systems, resulting in a potentially significant impact regarding slope stability. These impacts would be reduced to a less than significant level with the implementation of the soil movement control measures required by mitigation measure Geology-2.

Section 3.5, Geology and Soils, page 3.5-15, first full paragraph

Utility Improvements. All of the utility improvements proposed in Phase I would be located underground. The water, storm drain, sewer, electric, gas, telephone, and cable lines would all be located under the improved roadway. The new water line would also extend through an existing easement between Lots 10 and 11 to connect with an existing water main on Vista Court. All of the new utility lines would be bedded and shaded with imported granular backfill (e.g., sand or quarry fines) that could trap shallow groundwater and thereby decrease slope stability. Concrete check dams, or clay soil plugs, would be placed at regular intervals to prevent water travelling for long distances within the trench backfill, and to prevent piping of the granular materials. Impacts from landslides on utilities under the roadway would be less than significant with the implementation of mitigation measures Geology-1 (which would require various methods for filling utility trenches), Geology-2, and Geology-3.

Section 3.6, Hazards and Hazardous Materials, page 3.6-1, first paragraph

Wildfires are a public safety concern within the City of Redwood City. The subject property and portions of the surrounding neighborhood are located within a Wildlands Urban Interface Fire Area, which establishes certain requirements for vegetation management and ignition-resistant building design. The City contains an urban-wildland interface in the Emerald Hills neighborhood; however, due to typically mild temperatures in the area, conditions do not allow for frequent outbreaks. The Redwood City Fire Department’s Fire Prevention Officer confirmed that there has not been a wildfire outbreak in Redwood City in recent years (Lauricella pers. comm. 2009).

Section 3.6, Hazards and Hazardous Materials, page 3.6-4, last paragraph

The City of Redwood City General Plan (1990-2010) Safety Element policies relevant to hazards and hazardous materials are listed below.

Section 3.6, Hazards and Hazardous Materials, page 3.6-6

Mitigation Measure Hazards-1: Prior to issuance of any grading permit, the project sponsor applicant shall submit a construction safety plan to the Redwood City Planning Department for review and approval. The purpose of the plan will be to minimize the exposure of the public and construction workers to potentially hazardous materials during all phases of project construction. The plan shall require implementing appropriate control methods and approval containment and spill-control practices (e.g. spill control plan) for construction chemicals and materials used and stored on site. The applicant shall implement the approved construction safety plan.

Section 3.7, Hydrology and Water Quality, page 3.7-9, fourth full paragraph

The City of Redwood City General Plan (Redwood City 1990-2010) Safety Elements’ policies related to hydrology and water quality of the proposed project are listed below.

Section 3.7, Hydrology and Water Quality, pages 3.7-10 and 3.7-11

Mitigation Measure Hydrology-1: Prior to issuance of grading permits or approval of improvement plans, the applicant shall submit a detailed Erosion Control Plan (ECP) to the Director of Public Works of Redwood City for review and approval. The purpose of the ECP
shall be to mitigate erosion and sedimentation impacts during the construction period. The applicant shall implement the approved ECP. The detailed ECP shall be accompanied by a written narrative and shall include, at a minimum, the following:

a) Proposed schedule of grading activities, monitoring, and infrastructure milestones in chronological format
b) Identification of critical areas of high erodibility potential and/or unstable slopes
c) Use of soil stabilization techniques such as short-term biodegradable erosion control blankets and hydroseeding. Silt fences shall be installed downslope of all graded slopes. Straw wattles or another appropriate BMP shall be installed in the flow path of graded areas receiving concentrated flows, as well as around storm drain inlets
d) Description of erosion control measures on slopes, lots, and streets
e) Contour and spot elevations indicating runoff patterns before and after grading
f) Filter systems at catch basins (drop inlets) in private public streets as a means of sediment control
g) Post-construction inspection of all drainage facilities for accumulated sediment, and the clearing of these drainage structures of debris and sediment

Section 3.7, Hydrology and Water Quality, pages 3.7-11 and 3.7-12

Mitigation Measure Hydrology-3: Prior to issuance of any grading permit, the applicant shall submit a long-term Stormwater Pollution Prevention Plan (SWPPP) to the City Engineer for Redwood City for review and approval. The purpose of this SWPPP shall be to protect storm water quality after the construction period. The applicant shall implement the approved SWPPP. The SWPPP shall include the following additional BMPs to protect storm water quality:

a) Proper maintenance of paved areas can eliminate the majority of litter and debris washing into storm drains and entering local waterways. Regular sweeping is a simple and effective BMP aimed at reducing the amount of litter in storm drain inlets (to prevent clogging) and public waterways (for water quality). The Homeowners Association shall enter into an agreement with the City of Redwood City or other street sweeping contractor to ensure this maintenance is completed.
b) Proper maintenance of filtration systems is necessary to ensure their effectiveness. Filtration systems shall be maintained according to manufacturer’s instructions. A maintenance schedule and homeowner maintenance agreement shall be submitted to the City Engineer for Redwood City prior to construction.
c) The applicant shall prepare informational literature and guidance on residential BMPs to minimize pollutant contributions from the proposed development. The information shall be distributed to all future residents at the project site by the Homeowners Association. At a minimum, the information shall discuss the following topics:

1) Proper disposal of household and commercial chemicals
2) Proper use of landscaping chemicals
3) Clean-up and appropriate disposal of yard cuttings and leaf litter
4) Prohibition of any washing and dumping of materials and chemicals into storm drains
5) Proper maintenance of bioswales and a discussion of why the bioswales are in place and how they are important to maintaining the project site
Section 3.7, Hydrology and Water Quality, page 3.7-13

Mitigation Measure Hydrology-4: The Homeowners Association applicant shall be responsible for proper maintenance of drainage structures, filtration units, and equipment on the project site.

Section 3.7, Hydrology and Water Quality, pages 3.7-13

Mitigation Measure Hydrology-5: The applicant or its contractor shall prepare a Spill Contingency and Countermeasures Plan (SCCP) that describes prevention measures and response measures for spills of hazardous materials. The SCCP shall be submitted for the review and approval of the Regional Water Quality Control Board. The applicant shall implement the approved SCCP. At a minimum, the SCCP shall include:

a) Written descriptions of any spills occurring within the past year, corrective actions taken, and plans for preventing their reoccurrence.

b) A prediction of the direction, rate of flow, and total quantity of hazardous materials that could be discharged where experience indicates a potential for equipment failure.

c) A description of containment and/or diversionary structures or equipment to prevent discharged hazardous materials from reaching navigable waters, such as dikes, berms, or retaining walls; curbing; culverting, gutters, or other drainage systems; weirs, booms, or other barriers; spill diversion ponds; retention ponds; sorbent materials.

d) Where appropriate, a demonstration that containment and/or diversionary structures or equipment are not practical and a strong hazardous materials spill contingency plan and a written commitment of manpower, equipment, and materials to quickly control and remove spilled materials.

e) A complete discussion of the spill prevention and control measures applicable to the project site.

Section 3.7, Hydrology and Water Quality, page 3.7-15

Mitigation Measure Hydrology-7: Prior to recordation of the Final Map, the applicant shall submit to the City Engineer of Redwood City for review and approval a plan to mitigate increases in peak discharge such that post construction peak discharge does not exceed to less than 5% of preconstruction peak discharge by more than 5%. All drainage improvements shall be constructed in accordance with Redwood City’s Storm Drain Design Criteria (Engineering Standards Volume 3, Part V). The applicant shall confer with the City Engineer prior to the preparation of the plan for the purpose of receiving specific direction on the plan and what would be acceptable to the City. The applicant shall implement the approved plan to mitigate increases in peak discharge. Design elements in the plan could include:

a) Reconfiguration and/or redesign of bioretention swales;

b) Reconfiguration and/or redesign of detention pipelines or basins; and

c) Addition of detention tanks.

Section 3.8, Land Use and Planning, Recreation, and Agricultural Resources, page 3.8-1, fourth paragraph

The Redwood City General Plan (1990-2010) establishes the land use designation for the project area as Low Density Residential. The General Plan defines Low Density Residential land use as
“land to be developed with single-family dwellings either in hillside or flat areas of the city,” with densities of approximately 1 to 7 units per net acre.

Section 3.8, Land Use and Planning, Recreation, and Agricultural Resources, page 3.8-4, final paragraph
The City of Redwood City General Plan (Redwood City 1990-2010) Land Use and Open Space Elements’ policies relevant to land use and planning, recreation, and agricultural resources of the proposed project are listed below.

Section 3.8, Land Use and Planning, Recreation, and Agricultural Resources, page 3.8-5, insert new text at the top of the page

- **Built Environment**
  - **BE-1** Amend Zoning Ordinance and Map. Update the Zoning Ordinance and Zoning map to reflect the General Plan Land Use Map upon adoption of the General Plan. Create zoning districts as needed to implement the Land Use and Urban Form Chapter. Establish specific development standards for each newly created zoning district.
  - Establish floor area ratios (FAR) limits on residential development. FAR limits may vary based on neighborhood typology context, and site-specific conditions including slope.

Section 3.8, Land Use and Planning, Recreation, and Agricultural Resources, page 3.8-7, first full paragraph

*Potential Impact 3.8-2: The potential to conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect*

The project would involve the development of single family residences on lots with slopes greater than 30 percent. Redwood City regulations require that projects involving construction on lots with slopes greater than 30 percent apply for a Planned Development (PD) permit. A PD permit would establish new minimum lot size requirements as well as other lot design regulations. The applicant has submitted a PD application for this project. The proposed project is required to go through the CEQA review and the PD permitting process, and would be required to incorporate development plans (e.g., Tree Removal and Landscaping Plan) as part of any approval. General Plan Program BE-1 encourages the establishment of floor area ratio limits on residential development based on neighborhood typology context and site-specific conditions, including slope. General Plan Policy C-4 encourages the preservation of the forest-like character of the Emerald Lake Hills area by restricting development on slopes which exceed 30 percent. The proposed project would establish floor area limits for each lot and would set aside portions of the project area for preservation. The PD permitting process allows the City to structure an approval that does not allow for unrestricted development, and therefore the PD permitting process allows conformance with this policy Program BE-1 and Policy C-4. If the PD development permit is granted, then the proposed development would be considered compliant with the City’s land use regulations, including Program BE-1 and Policy C-4, and the project would not have a negative impact on land use plans, policies, or regulations.
Section 3.8, Land Use and Planning, Recreation, and Agricultural Resources, page 3.8-7, insert missing header before the final paragraph on the page and the heading labeled “Construction”

Potential Impact 3.8-4: The potential to require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment

Section 3.9, Noise, page 3.9-4, final full paragraph
The City of Redwood City addresses issues of land use compatibility, transportation noise, and community noise in the Noise Element of the City of Redwood City Strategic General Plan (1990-2010). The Noise Element established goals, objectives, and policies to promote compatible development throughout the city (listed below). A Noise and Land Use Compatibility Table is also presented with the element to identify acceptable and unacceptable noise level ranges for specific land use types (Table 3.9-3). The first section of this table addresses residential land uses, and recommends that new residential uses be located in areas where the CNEL is 60 or less.

Section 3.9, Noise, page 3.9-7, first full paragraph
Construction of the Laurel Way project would temporarily increase ambient noise levels in the project vicinity. The highest noise levels during the construction of the project would be generated during excavation and earthmoving activities required in Phase I, which would require between 6 and 9 months to complete. This phase would include excavation and grading of the roadway, as well as infrastructure and drainage improvements. Construction activities during Phase II, including the building, framing, and finishing of the proposed individual residences, would generally result in lower noise levels than the construction activities during Phase I. Phase II construction would occur during the remainder of the 5 years requested in the applicant’s draft Development Agreement. Table 3.9-4 describes the typical A-weighted average noise levels expected during various project construction activities.

Section 3.9, Noise, page 3.9-9, first full paragraph
The amplification of noise with multiple sources of construction noise is quite complex. For each additional source of noise (at the same level as the existing noise source), there is an increase of 3 dBA. The Redwood City Noise standards prohibit construction noise greater than 110 dBA. This project is unlikely to generate noise levels up to 110 dBA even with multiple home-building projects occurring at one time. The number of houses that could be built simultaneously would be limited by the Development Agreement required as part of mitigation measure Traffic-4, and this limitation in development would reduce the potential amplification of noise from multiple construction projects. Noise is not expected to generate levels in excess of 110 dBA during any part of construction.

Section 3.9, Noise, page 3.9-11, second paragraph
Construction would take place for up to 5 years as proposed in the applicant’s draft Development Agreement (including a one time, one year extension of the PD permit). Neighboring residents would be subject to construction noise resulting from an extended building schedule required for the completion of sixteen residences; however, these noise impacts would not be permanent. The noise generated from the proposed houses upon completion and occupation would be similar in character and level as current neighborhood noises. A maximum increase in traffic noise levels by 4 dBA would be expected to occur along Laurel Way, west of Highland Avenue. Traffic noise level increases on other area roadways would be less. With the projected 4 dBA increase, noise levels at residences along Laurel Way are expected to be 53 dBA CNEL. This noise level meets the City of Redwood City’s noise standards and represents a minimal increase in noise. The completed project and the accompanying traffic would not generate a
significant change in noise levels; therefore, no significant permanent noise level impacts would occur from the development of this project.

Section 3.9, Noise, pages 3.9-11 and 3.9-12, final paragraph on page 3.9-11
Construction of individual residences would be staggered and limited by the Development Agreement required as part of mitigation measure Traffic-4, with individual property owners having varying constraints upon when they are able to construct their individual residences within the eight year time frame. Nearly all construction activities would generate noise levels significantly above the existing ambient noise setting. Mitigation measures Noise-1 through Noise-4 and mitigation measure Traffic-4 would reduce the impacts of construction noise to a less than significant level.

Section 3.10, Population and Housing, page 3.10-1, fourth paragraph
The City of Redwood City General Plan Housing Element (Redwood City 2001-2010) promotes fair and equal opportunities in housing within the City. The Element provides policies and programs for multiple forms of housing that can serve the growing population of the City. No specific policies address hillside development in Redwood City.

Section 3.11, Public Services and Utilities, page 3.11-4, add as a new paragraph following the second full paragraph on the page
The project site is located outside the boundary of the Emerald Lake Heights Sewer Maintenance District (District). The San Mateo County Department of Public Works is the Administrator for the District. Any work on District facilities, including new connections, requires the approval of the Director of Public Works as authorized by the San Mateo County Ordinance Code Section 4.24.030. The approval of new connections to the District’s mains first requires annexation of the subject property to the District.

Section 3.11, Public Services and Utilities, pages 3.11-5 and 3.11-6
The City of Redwood City General Plan Housing Element’s (Redwood City 2001-2010) policies relevant to public services and utilities and to the proposed project are:

- Housing Element
  - E  The City shall ensure the availability of adequate public facilities, water supply, parks and open space for the expected housing and residents in the city.
  - H  The City will promote energy efficiency in existing and new housing in Redwood City.

The City of Redwood City General Plan Safety Element (Redwood City 1990-2010) policy relevant to public services and utilities and the proposed project is:

- Safety Element
  - S-6 Alternative water resources for fire fighting purposes should be identified for use during a disaster.

The City of Redwood City General Plan Conservation Element (Redwood City 1990-2010) policies relevant to public services and utilities and the proposed project are:

- Conservation Element
  - C-2 Foster development which, by its location and design, reduces the need for nonrenewable energy resources.
Conserve existing sources of water supplies by increasing reclamation of waste waters for suitable uses, and protect water quantity and quality of underground aquifers as an alternate emergency source of fresh water.

The City of Redwood City General Plan Land Use Element’s (Redwood City 1990-2010) policy relevant to public services and utilities and to the proposed project is:

- Land Use Element
  L-1 Residential development should be located only where services and facilities can be provided.

The City of Redwood City General Plan Built Environment Element (Redwood City 2010) policies relevant to public services and utilities and the proposed project are:

- Built Environment Element, Infrastructure Sub-Element
  BE-42.1 Require that improvements and maintenance to electric and gas transmission and distribution systems that are made to accommodate new growth be performed in a manner that maintains safety, reliability, and environmental compatibility.

Section 3.11, Public Services and Utilities, page 3.11-6, final paragraph

The worst-case scenario for water use and wastewater treatment needs would involve the simultaneous construction of six proposed houses, which would be the maximum limit for residential construction in any two-year period according to the applicant’s draft Development Agreement. Wastewater generated during the construction phase would also be minimal and temporary. Temporary restroom facilities, such as port-o-lets, would be used during the construction phase, and their use would not represent a significant increase in the amount of wastewater that would be treated by local facilities. Project construction would result in a less than significant impact on wastewater treatment facilities.

Section 3.11, Public Services and Utilities, page 3.11-7, second paragraph

The worst-case scenario for water needs would involve the simultaneous construction of six proposed houses, which would be the maximum limit for residential construction in any two-year period according to the applicant’s draft Development Agreement. The amount of water used for construction would be minimal and a one-time use of water, and would not result in the need for the construction of new water facilities or the expansion of existing facilities. The current water supply would be sufficient to cover all construction needs. Project construction would result in a less than significant impact on water use, water facilities, and water supplies.

Section 3.11, Public Services and Utilities, page 3.11-8, add as a new paragraph and mitigation measure following the third last paragraph on the page and before the discussion of Potential Impact 3.11-3

Ten of the proposed 18 new residences are currently proposed to be connected to existing sanitary sewer mains currently owned and maintained by the Emerald Lake Heights Sewer Maintenance District (District). Connection to these mains would first require annexation to the District’s boundaries, as well as the Emerald Lake District system connects to the South Bayside System, which has adequate capacity for all of the new homes. The applicant’s engineers conducted an analysis of the District sewer mains’ capacity to carry the additional wastewater that would be generated by these 10 new homes. The analysis showed that the mains have adequate capacity. Mitigation measure Public Services and Utilities-1 would require that the applicant comply with all District requirements and would reduce impacts to sanitary waste disposal to a less than significant level. The remaining 8 proposed residences are within the jurisdiction of the South Bayside System Authority, which has capacity to accommodate these 8 new residences.
These remaining 8 new residences would therefore have a less than significant impact on wastewater collection and treatment.

**Mitigation Measure Public Services and Utilities-1:** The applicant shall prepare a sewer main capacity analysis for the review and approval of the Emerald Lake Heights Sewer Maintenance District for the 10 new residences that are within the District's jurisdiction and that are proposed to connect to the District's sanitary sewer mains. This sewer analysis will evaluate the condition of the existing sewer lines and their capacity to accept the additional flow that would be generated by the new residences. The applicant shall also apply for and obtain annexation to the District prior to approval of any new sewer connections with the District. These new sewer connections must be approved and constructed prior to issuance of building permits for any of the 10 new residences that would be located within the Emerald Lake Heights Sewer Maintenance District.

**Section 3.11, Public Services and Utilities, page 3.11-9, first paragraph**

The worst-case construction scenario would involve the simultaneous construction of six proposed houses, which would be the maximum limit for residential construction in any two-year period according to the applicant's draft Development Agreement. Residential construction could result in a temporary increase in demand for fire protection and medical services during the construction period. There is a fire station approximately 0.2 miles driving distance from the project site. Medical service capacity is not likely to be exceeded as a result of construction of the proposed project because there are two hospitals with emergency services nearby. It is unlikely that additional police service would be necessary during the proposed project because the project is not likely to induce crime; any increase in police service needs would likely be negligible. No additional fire protection, police protection, or medical services facilities would need to be constructed as a result of the proposed project. Impacts would be less than significant.

**Section 3.11, Public Services and Utilities, pages 3.11-10 through 3.11-11, modifications to existing text as follows**

The Fire Department has performed an initial review of the water supply, water pressure, and water flow rates of the existing Laurel Way and Vista Court water lines. The Fire Department requires a minimum flow rate of 1,000 gallons per minute (gpm) above and beyond the maximum consumption rate (the assumed “worst-case scenario” where all residents in the area are using water at the same time) for a minimum duration of two hours (Lee 2010). The initial review of the existing Laurel Way water line determined that the existing water supply in this line is not only insufficient for the proposed project, it is below the Fire Department’s minimum requirements for the existing homes on Laurel Way (Lee 2010). The initial review of the Vista Court water line determined that the water supply in this line would most likely be adequate to meet the Fire Department’s minimum requirements for the proposed project, and that creating a loop between the Vista Court and Laurel Way water lines would increase the likelihood that sufficient water would be available for firefighting purposes (Lee 2010). The available water supply would need to be confirmed in order to ensure that the project would not have a significant impact on the Fire Department’s ability to fight fires in the area. Mitigation measure Public Services and Utilities-12 would require that an engineering report be performed to determine the available water supply, and would reduce potential impacts to firefighting services to a less than significant level.

**Mitigation Measure Public Services and Utilities-12:** Prior to building permit issuance, the applicant shall perform an engineering study to determine whether sufficient water supply would be available to the project to meet the minimum firefighting requirements of the Fire Department. The engineering study shall be submitted for the review and approval of the Building and Engineering Departments, as well as the Fire Department. If it is
determined that sufficient water supply is not available for the proposed project, then the study shall outline the infrastructure improvements that would be necessary in order to achieve the Fire Department’s minimum water supply requirements. The plans for infrastructure improvements, if required, shall be submitted for the review and approval of the Building and Engineering Departments and the Fire Department. The applicant shall be responsible for the construction and cost of infrastructure improvements.

**Other Public Facilities.** Electricity and natural gas would be provided to the project area by PG&E. PG&E would be responsible for any transmission and distribution system improvements that would be required to serve the proposed development. Redwood City would require that such infrastructure improvements be completed prior to issuance of building permits for any of the 16 proposed residences (Jany, pers. comm. 2012). Redwood City General Plan Policy BE-42.1 requires that all improvements to electric and gas transmission systems be performed in a manner that maintains safety, reliability, and environmental compatibility. Infrastructure improvements would be required to comply with General Plan Policy BE-42.1, and the project would therefore have a less than significant impact on electrical and natural gas utilities.

**Potential Impact 3.11-5: Potential to interrupt utility service**

Existing utilities would remain in place or be relocated during grading, roadway, and drainage improvement construction so that services are uninterrupted to the two existing homes on the unpaved portion of Laurel Way. The existing homes would be connected to the utility services (i.e., electric, telephone, cable TV, and gas) once road improvements are completed. This brief disconnection and reconnection could cause a temporary interruption in service; however, the impact would be temporary and mitigated to less than significant with the implementation of mitigation measures Public Services and Utilities-23 through Public Services and Utilities-45.

**Mitigation Measure Public Services and Utilities-23:** The applicant shall notify the owners of the existing homes on Laurel Way at least one month prior to utility interruption caused by the disconnection and reconnection of electric, telephone, cable TV, water, and natural gas service. An additional reminder notice shall be given 48 hours in advance of the disconnection. If the interruption to electric service will last longer than two hours, then the developer shall be responsible for providing temporary power to the two existing residences. The applicant shall make all reasonable efforts to minimize the interruption of utility service to these two residences.

**Mitigation Measure Public Services and Utilities-34:** The applicant shall work with local solid waste collection services to establish a trash and recycling waste collection service for the project site. If available, this collection service shall also include composting bins and/or yard waste collection and recycling.

**Mitigation Measure Public Services and Utilities-45:** The applicant shall comply with all water conservation techniques included in the PD statement, including:

- a) Landscaping shall emphasize native trees, grasses, and drought tolerant vegetation;
- b) Residences shall use recirculating hot water/structured plumbing systems; and
- c) Residences shall use home resource monitoring systems for use of water, electricity, and gas.

**Section 3.12, Transportation and Traffic, page 3.12-4, fourth paragraph**

The City of Redwood City General Plan (Redwood City 1990-2010) Circulation Element objectives and policies relevant to transportation and traffic for the project area are listed below.
Section 3.12, Transportation and Traffic, pages 3.12-4, Table 3.12-3

Table 3.12-3: Reported Traffic Accidents on Highland Avenue between 2004-2008

<table>
<thead>
<tr>
<th>Year</th>
<th>Number of Accidents</th>
</tr>
</thead>
<tbody>
<tr>
<td>2004</td>
<td>2</td>
</tr>
<tr>
<td>2005</td>
<td>0</td>
</tr>
<tr>
<td>2006</td>
<td>2</td>
</tr>
<tr>
<td>2007</td>
<td>0</td>
</tr>
<tr>
<td>2008</td>
<td>0</td>
</tr>
</tbody>
</table>

SOURCE: Delgado pers. comm. 2009a

Section 3.12, Transportation and Traffic, page 3.12-7, first full paragraph

Phase II. The highest level of construction traffic activity would occur during Phase II of the project. As outlined in the applicant’s draft Development Agreement, there would typically be up to three residences under construction during any given year of the proposed five-year (8 years with the opportunity for a one-time, 1 year extension) development window. However, the worst-case scenario for construction traffic would occur if six residences were under simultaneous construction, which is the maximum number of residences that could be under construction in any two one-year period under the proposed Development Agreement. The simultaneous construction of up to six residences was the scenario used to analyze traffic impacts of project construction. The revised project would have less effect.

Section 3.12, Transportation and Traffic, page 3.12-7

Mitigation Measure Traffic-4: The applicant shall submit a Development Agreement for the review and approval of the City of Redwood City that would require a limit of no more than four six individual homes may be under construction during any one two-year time period. Individual lot owners shall agree to build their homes on a staggered construction schedule such that all 18 residences can be built and completed within the allowable construction window. The Development Agreement shall allow for an 8-year construction window with the option for a one-time, one year extension.

Section 3.12, Transportation and Traffic, page 3.12-9

Mitigation Measure Traffic-5: A stop sign and painted stop bar shall be installed at the end of Laurel Way at Highland Avenue per City standards prior to commencement of Phase I construction activities. Any signage shall be installed in such a way that ensures unobstructed views to drivers.

Section 3.12, Transportation and Traffic, page 3.12-10

Mitigation Measure Traffic-7: Appropriate access shall be maintained for the existing Laurel Way residences during all phases of the proposed project. Adequate access for trucks, including fire trucks and emergency vehicles, shall be maintained at all times. No parking shall be allowed on Laurel Way (paved or unpaved portions) for construction vehicles or for the residents of the proposed residences until the infrastructure parking places are provided. Once the on street parking spaces are completed in Phase I, construction vehicles and residents may park in these on street parking spaces. At no time during project construction shall construction vehicles and equipment be parked or staged on the currently paved portion of Laurel Way, or on Highland Avenue. Construction vehicle
parking and construction equipment and material staging shall be maintained on the subject lots to the extent feasible throughout the Phase I and Phase II construction process.

**Section 3.12, Transportation and Traffic, page 3.12-11, fourth paragraph**

The worst-case parking scenario during Phase II construction would be if up to six residences were under construction at the same time, as stated in the applicant's draft Development Agreement and in mitigation measure Traffic-4. Implementation of mitigation measure Traffic-4, which would limit Phase II construction to no more than six residences during any two-year period, would reduce the parking requirements during construction. Implementation of the parking plan required under mitigation measure Traffic-1 would require shuttling and/or carpooling for construction workers if inadequate parking is available onsite. Implementation of mitigation measures Traffic-1 and -4 would reduce construction parking impacts to a less than significant level.

**Section 3.13, Greenhouse Gases, page 3.13-3**

Mitigation Measure GHG-1: To the extent feasible, construction workers living outside San Mateo County shall meet at staging areas and be transported (in carpools) to jobsites. The intent of this measure is to reduce the number of daily vehicle trips required to bring construction workers to and from the job site, and to reduce the construction parking demand at the job site.

**Section 5, Alternatives, page 5-3, fifth paragraph**

Section 15126.6(e) of the CEQA Guidelines requires consideration of the environmental consequences if the project is not constructed. The No Project Alternative would result if the current application (or another viable alternative) is not approved; the three lots are not merged and re-subdivided into lots 5 and 6, and the site would remain subject to the City's existing regulations. Since the existing lots are considered legal lots of record, the individual owners have a right to reasonably develop each property. Over time, each lot could be developed on an individual basis under current City regulations.

**Section 5, Alternatives, pages 5-6 and 5-7**

**REDUCED FLOOR AREA - ALTERNATIVE B**

The Reduced Floor Area Alternative would allow for the development of 18-16 single-family residences, but would reduce the maximum allowed floor area from that in the proposed project. This alternative would calculate the maximum floor area based on a slope density formula, weighted such that steeper sloping lots would result in a reduced floor area. This alternative would require either (1) adoption of a Zoning Ordinance Amendment and a Zoning Map Amendment to create a special zoning district, or (2) individual development agreements recorded on each property, in order to implement both a slope adjustment formula and a maximum allowable floor area multiplier.

A slope density formula has been developed based on research in other Bay Area cities with hillside developments, and is presented in Table 5.3-3. This slope density formula would apply to any lots with an average slope greater than 10 percent. The formula for maximum residence size developed for Alternative B is based on the factors of lot size and average lot slope. The intended result of the formula is that the smaller and steeper the lot, the smaller the maximum residence size. Although an extensive survey was conducted of other Peninsula jurisdictions to compare the allowable residence sizes, the formula that was developed for Alternative B was not taken directly from any one jurisdiction. The maximum house size formula was developed by using a formula for
calculating net lot size similar to that used for the hillside communities of Saratoga and Los Gatos. The City of Redwood City made modifications to the formula to obtain an allowable residence size, based on Redwood City's 40% lot coverage restriction, that was more compatible with the range of average home sizes in the immediate neighborhood. Neighborhood was defined as all the homes within a 300 foot radius from the project site, which is the same range that was used for mailing public hearing notices.

For lots with an average slope steeper than 10%, the communities of Saratoga and Los Gatos utilize the formula in Table 5.3-3 to reduce a lot's gross site area and determine the lot's net site area. The maximum allowable floor area is then based on the lot's reduced net site area:

<table>
<thead>
<tr>
<th>Average Slope of the Lot</th>
<th>Percent Reduction of Site Area for Maximum Floor Area Calculations¹</th>
</tr>
</thead>
<tbody>
<tr>
<td>10.01-20%</td>
<td>10%, plus 2% for each 1% of slope over 10%</td>
</tr>
<tr>
<td>20.01-30%</td>
<td>30%, plus 3% for each 1% over 20%</td>
</tr>
<tr>
<td>Over 30%</td>
<td>60%</td>
</tr>
</tbody>
</table>

Notes:
¹Where the average slope is a fractional number, the slope shall be rounded up to the next whole number.

SOURCE: Saratoga Municipal Code §15.45.030(c) and the Los Gatos Hillside Development Standard and Guidelines IV Table 1.

The maximum allowable floor area would be 40 percent of the reduced lot size based on the slope density formula in Table 5.3-43, with a minimum floor area of 2,000 (including garage) square feet. Table 5.3-54 lists the resulting maximum floor area limits for the 18 subject lots (excluding Lot 6).

The average maximum floor area for the 18-16 lots under the proposed project is 3,965 square feet, while the average maximum floor area for the 18-16 lots under the Reduced Floor Area Alternative would be 2,479 square feet, representing a reduction in house sizes of almost 60 percent. The average size of the existing single-family residences in the project vicinity within a 1,000 foot radius of the project area is 2,643 3,964 2,141 square feet (including garages), so the maximum floor area allowed under the Reduced Floor Area Alternative would be substantially lower than that of is more in keeping with other development in the neighborhood than the proposed project. Other development regulations, such as setbacks, lot coverage, pervious areas, and building height, would either need to comply with existing City regulations or be established by a Planned Development permit.

The Reduced Floor Area Alternative could result in fewer environmental impacts than the proposed alternative, as this alternative would result in smaller residences and a smaller footprint of impacts. The reduction in environmental impacts may be minor, however, as this alternative would still result in the development of 18-16 residences on the 18-16 subject lots. Impacts would likely be incrementally reduced for slope stability, erosion, drainage, tree removal, and visual impacts.

The Reduced Floor Area Alternative would meet the project objective of building 18-16 single-family residences, though the size of the residences would be significantly smaller than those requested in the current proposal.
### Table 5.3-43: Slope Density Formula

<table>
<thead>
<tr>
<th>Average Slope of the Lot</th>
<th>Percent Reduction of Site Area for Maximum Floor Area Calculations¹</th>
</tr>
</thead>
<tbody>
<tr>
<td>10.01-20%</td>
<td>5%, plus 1% for each 1% of slope over 10%</td>
</tr>
<tr>
<td>20.01-30%</td>
<td>15%, plus 2% for each 1% over 20%</td>
</tr>
<tr>
<td>Over 30%</td>
<td>35%</td>
</tr>
</tbody>
</table>

**Notes:**

¹ Where the average slope is a fractional number, the slope shall be rounded up to the next whole number.

### Table 5.3-54: Maximum Floor Area Limits under the Reduced Floor Area Alternative

<table>
<thead>
<tr>
<th>Lot #</th>
<th>Lot Area (sq. ft.)</th>
<th>Average Slope (%)</th>
<th>Percent Reduction in Site Area (%)</th>
<th>Adjusted Lot Area (sq. ft.)</th>
<th>Maximum Floor Area (sq. ft.)¹</th>
<th>PD Proposed Floor Area (sq. ft.)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>11,000</td>
<td>34</td>
<td>35</td>
<td>7,150</td>
<td>2,860</td>
<td>4,400</td>
</tr>
<tr>
<td>2</td>
<td>10,700</td>
<td>33</td>
<td>35</td>
<td>6,955</td>
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<tr>
<td>3</td>
<td>9,900</td>
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<td>6,435</td>
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<td>6,110</td>
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<td>4,095</td>
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<td>4,810</td>
<td>2,000</td>
<td>3,330</td>
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<tr>
<td>14</td>
<td>7,400</td>
<td>41</td>
<td>35</td>
<td>4,810</td>
<td>2,000</td>
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</tr>
<tr>
<td>15</td>
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<td>4,940</td>
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<tr>
<td>16</td>
<td>7,900</td>
<td>38</td>
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<td>5,135</td>
<td>2,054</td>
<td>3,555</td>
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<td>17</td>
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<td>35</td>
<td>5,720</td>
<td>2,288</td>
<td>3,960</td>
</tr>
</tbody>
</table>

**Total** | **44,630** | **71,365**

**Average** | **2,479** | **3,965**

**Notes:**

¹ Minimum allowable floor area would be 2,000 sq ft
Section 7, References
All references to the City of Redwood City General Plan are replaced with the following:

Section 7, References, page 7-4
Add the following reference under the heading Geology:

Section 7, References, page 7-6
Add the following reference under the heading Public Services and Utilities:
Jany, Charles. 2012. Redwood City Planning & redevelopment Department, Principal Planner. Personal communication with Jeffrey Smith of Panorama Environmental, Inc. on Thursday October 25, 2012.

4.3 Graphics Edits
Edits have been made to the graphics found in Chapter 2: Project Description of this Revised Final the Draft EIR to show the revised project. Specifically, Figures 2.3-2, 2.3-3, and 2.4-1 have been revised to reflect the project changes in the new application. Two new graphics have been added in the Final EIR. These new graphics include Figures 2.1-1 and 2.1-2 in Chapter 2: Project Description.

4.4 Appendix Edits and Additions
No edits have been made to Appendix C of the existing appendices found in the Draft EIR. The revised Appendix C is attached to this Revised Final EIR. Four new appendices have been added in the Revised Final EIR as follows:

- Appendix A includes the revised Mitigation Monitoring and Reporting Program (MMRP) that would be used to implement and monitor all of the mitigation measures included in the EIR.
- Appendix B includes an email from Mr. Roland Haga, the project engineer for the applicant, providing a preliminary sewer main analysis. This analysis was requested by the County of San Mateo Department of Public Works in comment G-2 of its April 7, 2010 comment letter.
- Appendix C includes a revised table showing the addresses and residence sizes for home in the vicinity of the project. This table was generated by City of Redwood City staff using information supplied by the County of San Mateo Assessor’s Office in June 2011.
- Appendix D includes a table showing the addresses and residence sizes of hillside residential development in Redwood City. This table was generated by the applicant based off of Multiple Listing Service (MLS) data for hillside residences sold between January 1, 2010 and March 31, 2010.
- Appendix E includes the comment letters received during the public review period for the Draft EIR, as well as the comments received at the April 6, 2010 Planning Commission public hearing.
- Appendix F includes the project plans included with the September 9, 2011 Planned Development Permit application.
• Appendix G includes a description of project construction sequencing and staging and a description of the proposed roadway, utility, and drainage improvements, submitted by the applicant and dated received by the City of Redwood City on January 22, 2012.

• Appendix H includes the January 22, 2012 Supplemental Geologic and Geotechnical Report prepared by Cornerstone Earth Group.