RESOLUTION NO. _____

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF CERTIFYING THE FINAL ENVIRONMENTAL IMPACT REPORT (SCH # 2016112041) FOR THE VETERANS MEMORIAL SENIOR CENTER/YMCA PROJECT, AND ADOPTING ENVIRONMENTAL FINDINGS, A MITIGATION MONITORING AND REPORTING PROGRAM, AND A STATEMENT OF OVERRIDING CONSIDERATIONS PURSUANT TO THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

WHEREAS, the City of Redwood City (“City”) proposes to rezone an approximately 5.4-acre site located at 1455 Madison Avenue and 711 Nevada Street within the larger 31.7-acre Red Morton Community Park to demolish existing buildings (including the existing Veterans Memorial Senior Center [VMSC]) and improvements; construct a new approximately 45,000 square-foot VMSC, 35,000 square foot YMCA, and neighborhood traffic calming measures (“Project”); and

WHEREAS, pursuant to section 21067 of the Public Resources Code of the California Environmental Quality Act (Pub. Res. Code §§ 21000 et seq.) (“CEQA”), and Section 15367 of the State CEQA Guidelines (Cal. Code Regs., tit. 14, § 15000 et seq.), the City is the lead agency for the proposed Project; and

WHEREAS, the City determined that the Project required the preparation of an Environmental Impact Report (“EIR”), pursuant to the requirements of the California Environmental Quality Act, and the State CEQA Guidelines in order to analyze all potential adverse environmental impacts of the proposed Project; and

WHEREAS, the City issued a Notice of Preparation (“NOP”) of a Draft EIR for the Project on or about November 14, 2016, and it was submitted to the State Clearinghouse, local and regional agencies, and posted at the San Mateo County Clerk’s office for a 30-day comment period, and a scoping session was held on December 6, 2016; and

WHEREAS, due to changes in the Project description, a revised NOP was issued on August 24, 2018; and

WHEREAS, as stated in the NOP, comments and participation was sought from the public and interested and affected groups and agencies; and

WHEREAS, the Draft EIR for the Project was circulated for public review and comment for 45 days beginning on June 7, 2019 and ending on July 22, 2019, and was filed with the State Office of Planning & Research under State Clearinghouse No. 2016112041; and
WHEREAS, pursuant to State CEQA Guidelines section 15086, the City consulted with and requested comments from all responsible and trustee agencies, other regulatory agencies, and other interested parties during the 45-day public review and comment period; and

WHEREAS, as contained herein, the City Council has endeavored in good faith to set forth the basis for its recommendation on the proposed Project; and

WHEREAS, all the requirements of CEQA and the State CEQA Guidelines have been satisfied by the City in the EIR, which is sufficiently detailed so that all of the potentially significant environmental effects of the Project have been adequately evaluated; and

WHEREAS, the EIR prepared in connection with the Project sufficiently analyzes both the feasible Mitigation Measures necessary to avoid or substantially lessen the Project’s potential environmental impacts and a range of feasible alternatives capable of eliminating or reducing these effects in accordance with CEQA and the State CEQA Guidelines; and

WHEREAS, the City has made certain findings of fact, as set forth in Exhibit “A” to this Resolution, attached hereto and incorporated herein, based upon the oral and written evidence presented to it as a whole and the entirety of the administrative record for the Project, which are incorporated herein by this reference; and

WHEREAS, the City finds that environmental impacts, including cumulative impacts, that are identified in the EIR that are less than significant with incorporation of mitigation measures are described in Section II of Exhibit A; and

WHEREAS, the City finds that even with the incorporation of all feasible mitigation measures, there are environmental impacts identified in the EIR that are significant and unavoidable, as described in Section III of Exhibit A; and

WHEREAS, the potential significant irreversible environmental changes that would result from the proposed Project identified in the EIR and set forth herein, are described in Section IV of Exhibit A; and

WHEREAS, the existence of any growth-inducing impacts resulting from the proposed Project identified in the EIR and set forth herein, are described in Section V of Exhibit A; and

WHEREAS, alternatives to the proposed Project that might further reduce the already less than significant environmental impacts are described in Section VII of Exhibit A; and
WHEREAS, pursuant to Public Resources Code section 21081.6 and State CEQA Guidelines section 15097, the City has prepared a program for reporting on or monitoring the changes which it has either required in the Project or made a condition of approval to mitigate or avoid significant environmental effects (the “Mitigation Monitoring and Reporting Program” or “MMRP”), which is attached hereto as Exhibit “B”; and

WHEREAS, the EIR concluded that the Project would have a significant and unavoidable impact on historical resources; and

WHEREAS, on July 2, 2019, the Planning Commission held a duly noticed public hearing and received public testimony on the Draft EIR; and

WHEREAS, on July 11, 2019, the Historic Resources Advisory Committee held a duly noticed public hearing and received public testimony on the Draft EIR. The City received written and public testimony from the public during the Draft EIR public review period; and

WHEREAS, all of the findings, recommendations and conclusions made by the City Council pursuant to this Resolution are based upon the oral and written evidence presented to it as a whole and not based solely on the information provided in this Resolution; and

WHEREAS, prior to taking action, the City Council has heard, been presented with, reviewed and considered all of the information and data in the administrative record, including by not limited to the Draft EIR, all of which is incorporated herein by this reference; and

WHEREAS, no significant new information has been added to the EIR after public notice of the availability of the Draft EIR or added or modified in the Final EIR, under CEQA Guidelines Section 15088.5. The additional information and modifications that have been provided do not show (1) a new significant environmental impact, (2) a substantial increase in the severity of an environmental impact, (3) that a feasible project alternative or mitigation measure would clearly lessen the significant impacts of the Project, but that the City declines to adopt it, or (4) that the Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comments are precluded. The EIR mitigation measures are incorporated into the Project to avoid or substantially lessen significant environmental effects. Therefore, no further analysis is required and there is no need to recirculate a revised EIR for further review and comment; and

WHEREAS, the City prepared written responses to the comments received during the comment period, which together with the Mitigation Monitoring and Reporting Program (“MMRP”) and the Draft EIR constitutes the Final EIR; and
WHEREAS, the Final EIR was published on October 11, 2019 more than 10-days before the Planning Commission and City Council hearings on the EIR; and

WHEREAS, on November 19, 2019, the Planning Commission held a duly noticed public hearing and recommended certification of the Final EIR, adoption of the environmental findings, a Mitigation Monitoring and Reporting Program and a State of Overriding Considerations pursuant to the California Environmental Quality Act, as well as issuance of the Project approvals; and

WHEREAS, all other legal prerequisites to the adoption of this Resolution have occurred.

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

1. The above recitals are true and correct and together with the staff report and the application materials, including, without limitation the Final EIR, and all other documents, reports, studies, maps, oral and written testimony, and materials in the City's file for the Project, all adopted City planning documents relating to the Project and the Property including the City’s General Plan, Zoning Ordinance, and other applicable City laws and regulations, and all testimony and any submissions made to the City Council with regard to the Project, have together served as an adequate and appropriate evidentiary basis for the findings and actions set forth in this Resolution.

2. As the decision-making body for the Project, the City Council has reviewed and considered the Final EIR, the administrative record for the Project, and all Project materials on file with the City and available for review at Office of the City Clerk, 1017 Middlefield Road, Redwood City California. The City Council finds that the Final EIR has been completed in compliance with CEQA and the State CEQA Guidelines.

3. The City Council finds that the Final EIR for the Project was presented to the City Council, that the Final EIR was prepared, published, circulated, reviewed, and completed in full compliance with state law and CEQA Guidelines, that there was adequate public review of the Draft EIR, that it has considered all comments on the Draft EIR and responses to comments, that the Final EIR adequately discusses all significant environmental issues, and that the Final EIR reflects the independent judgment and analysis of the City Council. The City Council further certifies that it has reviewed and considered the information in the Final EIR.

4. The City Council finds that the information added in the Final EIR, and any information subsequently presented to the Planning Commission or City Council, does not constitute significant new information requiring recirculation, but rather that additional information clarifies or amplifies an adequate EIR.
5. Pursuant to CEQA Section 21081.6 and CEQA Guidelines Section 15091, and in support of its Project approvals of same date, the City Council has reviewed and considered the CEQA Findings of Fact for the project, attached hereto as Exhibit “A” incorporated herein by reference, and adopts such Findings of Fact.

6. The Final EIR identifies that the Project has potentially significant effects with regard to historical resources that will remain significant despite the implementation of all feasible mitigation measures. Therefore, in support of its the Project approvals of same date, the City Council hereby adopts a Statement of Overriding Considerations that indicates the benefits of the Project outweigh the significant and unavoidable environmental effects as required by State CEQA Guidelines section 15093 as set forth in Section VII of Exhibit A.

7. Pursuant to CEQA Section 21081.6 and CEQA Guidelines Section 15091 the City Council has reviewed and considered the MMRP that requires all mitigation measures described in the Final EIR be implemented as set forth in the MMRP, attached hereto as Exhibit B and incorporated herein by reference.

8. The City Council certifies the Final EIR for the Project and adopts the MMRP.

9. The City Council directs the City’s Community Development Department to file a Notice of Determination with the County Clerk of San Mateo County upon approval of the project.

10. Pursuant to CEQA Guidelines Section 15091(e), the documents and other materials that constitute the record of proceedings are located in and may be obtained from the Office of the City Clerk at 1017 Middlefield Road Redwood City California. The City Clerk is the custodian of records for all matters before the City.

11. This Resolution is effective upon its adoption.

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EXHIBIT “A”
CEQA Findings of Fact

The California Environmental Quality Act (Pub. Resources Code, § 21000 et seq.) (CEQA) requires that public agencies shall not approve or carry out a project for which an environmental impact report (EIR) has been certified that identifies one or more significant adverse environmental effects of a project unless the public agency makes one or more written Findings for each of those significant effects, accompanied by a brief explanation of the rationale for each Finding (State CEQA Guidelines [Cal. Code Regs., tit. 14, § 15000 et seq.], § 15091). This document presents the CEQA Findings of Fact made by the City of Redwood City, in its capacity as the CEQA lead agency, regarding the Veterans Memorial Senior Center/YMCA Project (project), evaluated in the Draft Environmental Impact Report (“Draft EIR”) and Final Environmental Impact Report (Final EIR) for the project.

SECTION 1
INTRODUCTION

Public Resources Code section 21002 states that “public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects[].” Section 21002 further states that the procedures required by CEQA “are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects.”

Pursuant to section 21081 of the Public Resources Code, a public agency may only approve or carry out a project for which an EIR has been completed that identifies any significant environmental effects if the agency makes one or more of the following written finding(s) for each of those significant effects accompanied by a brief explanation of the rationale for each finding:

1. Changes or alterations have been required in, or incorporated into, the project, which mitigate or avoid the significant effects on the environment.

2. Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.

3. Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.

As indicated above, section 21002 requires an agency to “avoid or substantially lessen” significant adverse environmental impacts. Thus, mitigation measures that “substantially lessen” significant environmental impacts, even if not completely avoided, satisfy section 21002’s mandate. (Laurel Hills Homeowners Assn. v. City Council (1978) 83 Cal.App.3d 515, 521 [“CEQA does not mandate the choice of the environmentally best feasible project if through the imposition of feasible mitigation measures alone the appropriate public agency has reduced environmental damage from a project to an acceptable level”]; Las Virgenes Homeowners Fed., Inc. v. County of Los Angeles (1986) 177 Cal.App. 3d 300, 309 [“[t]here is no requirement that adverse impacts of a project be avoided completely or reduced to a level of insignificance . . . if such would render the project unfeasible”].)

While CEQA requires that lead agencies adopt feasible mitigation measures or alternatives to substantially lessen or avoid significant environmental impacts, an agency need not adopt infeasible mitigation measures or alternatives. (Pub. Resources Code, § 21002.1(c) [if “economic, social, or other conditions make it infeasible to mitigate one or more significant effects on the environment of a project, the project may nonetheless be carried out or approved at the discretion of a public agency”]; see also State CEQA Guidelines, § 15126.6(a) [an “EIR is not required...
to consider alternatives which are infeasible”). CEQA defines “feasible” to mean “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors.” (Pub. Resources Code, § 21061.1.) The State CEQA Guidelines add “legal” considerations as another indicia of feasibility. (State CEQA Guidelines, § 15364.) Project objectives also inform the determination of “feasibility.” (Jones v. U.C. Regents (2010) 183 Cal. App. 4th 818, 828-829.) “[F]easibility’ under CEQA encompasses ‘desirability’ to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, and technological factors.” (City of Del Mar v. City of San Diego (1982) 133 Cal.App.3d 401, 417; see also Sequoyah Hills Homeowners Assn. v. City of Oakland (1993) 23 Cal.App.4th 704, 715.) “Broader considerations of policy thus come into play when the decision making body is considering actual feasibility [.]” (Cal. Native Plant Soc’y v. City of Santa Cruz (2009) 177 Cal.App.4th 957, 1000 (“Native Plant”); see also Pub. Resources Code, § 21081(a) (3) “[economic, legal, social, technological, or other considerations” may justify rejecting mitigation and alternatives as infeasible] (emphasis added).)

Environmental impacts that are less than significant do not require the imposition of mitigation measures. (Leonoff v. Monterey County Board of Supervisors (1990) 222 Cal.App.3d 1337, 1347.)

The California Supreme Court has stated, “[t]he wisdom of approving . . . any development project, a delicate task which requires a balancing of interests, is necessarily left to the sound discretion of the local officials and their constituents who are responsible for such decisions. The law as we interpret and apply it simply requires that those decisions be informed, and therefore balanced.” (Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553, 576.) In addition, perfection in a project or a project’s environmental alternatives is not required; rather, the requirement is that sufficient information be produced “to permit a reasonable choice of alternatives so far as environmental aspects are concerned.” Outside agencies (including courts) are not to “impose unreasonable extremes or to interject [themselves] within the area of discretion as to the choice of the action to be taken.” (Residents Ad Hoc Stadium Com. v. Board of Trustees (1979) 89 Cal.App.3d 274, 287.)

SECTION II
IMPACTS THAT ARE LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

The following findings, including impact statements, mitigation measures, findings, and facts in support of findings, are based on the full administrative record including but not limited to the Final EIR, which contains a greater discussion of each issue. Pursuant to CEQA Guidelines Section 15091(a) (1), the mitigation measures will be required in the project and avoid or substantially lessen the significant environmental effects identified in the Final EIR, as described herein.

Air Quality

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

Finding: The implementation of mitigation measure MM AIR-3.1 would reduce the project’s significant community risk caused by construction activities to a less than significant level. (Less than Significant Impact with Mitigation Incorporated) Changes or alterations have been required in, or incorporated into, the Project, which avoid or substantially lessen the significant environmental effects as identified in the EIR. (State CEQA Guidelines, section 15091(a) (1).)

Facts in Support of Finding: The computed maximum increased lifetime residential cancer risk from construction would be 3.5 in one million or less with implementation of the above mitigation measure, which would be below the BAAQMD significance threshold of 10 in one million, as identified on page 41 of the Draft EIR.
MM AIR-3.1: Prior to issuance of a grading permit, the project shall develop a plan demonstrating that the off-road equipment used on-site to construct the project would achieve a fleet-wide average 55-percent reduction in DPM exhaust emissions or greater. The plan shall be submitted and approved by the City Planning Division. The following are feasible methods:

- All diesel-powered off-road equipment, larger than 25 horsepower, operating on the site for more than two days continuously shall, at a minimum, meet EPA particulate matter emissions standards for Tier 3 engines with CARB-certified Level 3 Diesel Particulate Filters or equivalent.
- All diesel-powered off-road equipment, larger than 25 horsepower, operating on the site for more than two days continuously shall meet EPA Tier 4 standards for particulate matter.
- The use of equipment that includes electric or alternatively fueled equipment (i.e., non-diesel) would meet the reduction requirement above.

The City finds that Mitigation Measure AIR-3.1 is feasible, is adopted, and will further reduce impacts associated with this issue to a level of less than significant. Accordingly, the City finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant impacts of the proposed project related to this issue.

**Impact AIR-C:** The project would result in a cumulatively considerable contribution to a significant air quality impact.

**Finding:** The implementation of mitigation measure MM AIR-3.1 would reduce the project’s cumulatively considerable contribution to a significant cumulative community risk to a less than significant level. *(Less than Significant Cumulative Impact with Mitigation Incorporated).* Changes or alterations have been required in, or incorporated into, the Project, which avoid or substantially lessen the significant environmental effects as identified in the EIR. *(State CEQA Guidelines, section 15091(a) (1).)*

**Facts in Support of Finding:** The computed cumulative community health risk with implementation of the above mitigation measure would be below the BAAQMD cumulative significance thresholds. Additionally, no single project is sufficient in size, by itself, to result in nonattainment of ambient air quality standards. Instead, a project’s individual emissions contribute to existing cumulatively significant adverse air quality impact (page 42 of the Draft EIR).

See MM AIR-3.1 above.

The City finds that Mitigation Measure AIR-3.1 is feasible, is adopted, and will further reduce impacts associated with this issue to a level of less than significant. Accordingly, the City finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant impacts of the proposed project related to this issue.

**Biological Resources**

**Impact BIO-1:** The project would have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS.

**Finding:** The implementation of mitigation measure MM BIO-1.1 would reduce the project’s significant impact to nesting birds to a less than significant level. *(Less than Significant Impact with Mitigation Incorporated).* Changes
or alterations have been required in, or incorporated into, the Project, which avoid or substantially lessen the significant environmental effects as identified in the EIR. (State CEQA Guidelines, section 15091(a) (1).)

**Facts in Support of Finding:** The project, with implementation of the above mitigation measure, would reduce impacts to nesting birds (if present) to a less than significant level by avoiding construction during nesting bird season or completing pre-construction nesting bird surveys to minimize and/or avoid impacts to nesting birds (page 48 of the Draft EIR).

**MM BIO-1.1:** Construction shall be scheduled to avoid the nesting bird season to the extent feasible. The nesting season for most birds, including most raptors, in the San Francisco Bay Area extends from February 1 through August 31.

If it is not possible to schedule construction activities between September 1 and January 31, then pre-construction surveys for nesting birds shall be completed by a qualified ornithologist to ensure no nest shall be disturbed during project implementation. This survey shall be completed no more than 14 days prior to the initiation of grading, tree removal, or other demolition or construction activities during the early part of the breeding season (February through April) and no more than 30 days prior to the initiation of these activities during the late part of the breeding season (May through August).

During this survey, the ornithologist shall inspect all trees and other possible nesting habitats within and immediately adjacent to the construction area for nests. If an active nest is found sufficiently close to work areas to be disturbed by construction, the ornithologist, in consultation with CDFW, shall determine the extent of a construction-free buffer zone to be established around the nest to ensure that nests of bird species protected by the MBTA or Fish and Game Code shall not be disturbed during project construction.

A final report of nesting birds, including any protection measures, shall be submitted to the Director of Community Development prior to the start of grading or tree removal.

The City finds that Mitigation Measure BIO-1.1 is feasible, is adopted, and will further reduce impacts associated with this issue to a level of less than significant. Accordingly, the City finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant impacts of the proposed project related to this issue.

**Impact BIO-C:** The project would result in a cumulatively considerable contribution to a significant biological resources (i.e., nesting birds) impact.

**Finding:** The implementation of mitigation measure MM BIO-1.1 would reduce the project’s cumulatively considerable contribution to a significant cumulative impact to nesting birds to a less than significant level. (*Less than Significant Cumulative Impact with Mitigation Incorporated.*) Changes or alterations have been required in, or incorporated into, the Project, which avoid or substantially lessen the significant environmental effects as identified in the EIR. (State CEQA Guidelines, section 15091(a) (1).)
**Facts in Support of Finding:** The project, with implementation of the above mitigation measure, would reduce the project’s cumulatively considerable contribution to a significant cumulative impact to nesting birds to a less than significant level by avoiding construction during nesting bird season or completing pre-construction nesting bird surveys to minimize and/or avoid impacts to nesting birds (page 48 and 50 of the Draft EIR).

See MM BIO-1.1 above.

The City finds that Mitigation Measure BIO-1.1 is feasible, is adopted, and will further reduce impacts associated with this issue to a level of less than significant. Accordingly, the City finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant impacts of the proposed project related to this issue.

**Cultural Resources**

**Impact CUL-2:** The project would cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5.

**Finding:** The implementation of mitigation measures MM CUL-2.1 and MM CUL-2.2 would reduce the project’s significant impact to archaeological resources to a less than significant level. (Less than Significant Impact with Mitigation Incorporated). Changes or alterations have been required in, or incorporated into, the Project, which avoid or substantially lessen the significant environmental effects as identified in the EIR. (State CEQA Guidelines, section 15091(a) (1).)

**Facts in Support of Finding:** The project, with implementation of mitigation measures MM CUL-2.1 and MM CUL-2.2, would not result in significant impacts to archaeological resources because the project would require training of construction personnel regarding identifying and protecting archaeological resources and halting work if a resource is encountered in order to assess the find and mitigate/avoid impacts if determined to be significant. The facts in support of the finding is further described on page 57 of the Draft EIR and page 13 through 21 of the Final EIR.

**MM CUL-2.1:** Prior to the issuance of grading permits, the project applicant is responsible for ensuring all construction crews undergo adequate training for the identification of federal or state-eligible cultural resources, and that the construction crews are aware of the potential for previously undiscovered archaeological resources, of the laws protecting these resources and associated penalties, and of the procedures to follow should they discover cultural resources during project-related work.

**MM CUL-2.2:** A certified archeologist and a culturally affiliated Native American with knowledge of cultural resources shall monitor all ground-disturbing activities. If deposits of prehistoric or historic archeological materials are encountered during project construction activities, all work within an appropriate buffer area (no less than 50 feet) around the discovery shall be stopped and a qualified archeologist meeting federal criteria under 36 CFR 61, in consultation with the culturally affiliated Native American with knowledge of cultural resources, shall be contacted to assess the deposit(s) and make recommendations.

If the deposits are recommended to be non-significant by a qualified archeologist in consultation with the culturally affiliated Native American with knowledge of cultural resources, avoidance is not necessary. If the deposits are determined to be potentially significant by the qualified archeologist in consultation with the culturally affiliated
Native American with knowledge of cultural resources, the resources shall be avoided. If avoidance is not feasible, project impacts shall be mitigated in accordance with the recommendations of the qualified archaeologist, in coordination with the City Planning, Housing, and Economic Development Department and CEQA Guidelines Section 15126.4 (b)(3)(C), which requires implementation of a data recovery plan.

The data recovery plan shall be prepared and implemented by a qualified archaeologist. The data recovery plan shall include provisions for adequately recovering all scientifically consequential information from and about any discovered archeological materials and include recommendations for the treatment of these resources. In-place preservation of the archeological resource is the preferred manner of mitigating potential impacts, as it maintains the relationship between the resource and the archeological context. In-place preservation also reduces the potential for conflicts with the religious or cultural values of groups associated with the resource. Other mitigation options include, but are not limited to, the full or partial removal and curation of the resource. The data recovery plan shall be conducted prior to any additional earth-moving activities in the area of the resource. The recovery plan shall be submitted to the project applicant, the City Planning, Housing, Economic Development Department, and the Northwest Information Center (NWIC). Once the recovery plan is reviewed and approved by the City Planning, Housing, and Economic Development Department and any appropriate resource recovery completed, project construction activity within the area of the find may resume. A data recovery plan shall not be required for resources that have been deemed by the NWIC as adequately recorded and recovered by studies already completed.

The City finds that Mitigation Measures CUL-2.1 and CUL-2.2 are feasible, are adopted, and will further reduce impacts associated with this issue to a level of less than significant. Accordingly, the City finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant impacts of the proposed project related to this issue.

Noise

Impact NOI-1: The project would result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

Finding: The project, in conformance with General Plan Program PS-63 and with the implementation of mitigation measures MM NOI-1.1 and MM NOI-1.2, would reduce temporary construction and permanent operational (i.e., mechanical equipment) noise impacts to a less than significant level. (Less than Significant Impact with Mitigation Incorporated). Changes or alterations have been required in, or incorporated into, the Project, which avoid or substantially lessen the significant environmental effects as identified in the EIR. (State CEQA Guidelines, section 15091(a) (1)).

Facts in Support of Finding: The project, in conformance with General Plan Program PS-63 and with the implementation of mitigation measure MM NOI-1.1 above, would reduce construction noise levels and minimize disruption from the site to a less than significant level by restricting construction hours, controlling noise from construction activities and equipment, notifying and coordinating with nearby residences, and designating a disturbance coordinator to address noise complaints. In addition, the project does not propose the use of high-intensity construction equipment, such as pile drivers.
The project, with the implementation of mitigation measure MM NOI-1.2, would reduce noise impacts from mechanical equipment at nearby sensitive receptors by requiring the equipment type, design, and/or location be as such to meet ambient noise conditions at nearby residences. For this reason, the project’s mechanical equipment would not result in a significant impact. The facts in support of this finding are further described on pages 118 through 119 of the Draft EIR.

**MM NOI-1.1** The project shall develop a construction noise control plan, which shall include, but is not limited to, the following measures:

- If residents surrounding the project site complain about weekend and/or holiday construction noise or if work is disruptive to the adjacent Red Morton Community Park activities occurring on Saturdays, all weekend and holiday construction work shall cease at the City’s discretion, as specified in the allowable construction hours stated in the City’s Municipal Code.
- Construct temporary noise barriers shall be installed, where feasible to screen stationary noise-generating equipment when located within 200 feet of adjoining sensitive land uses. Temporary noise barrier fences would provide a five dBA noise reduction if the noise barrier interrupts the line-of-sight between the noise source and receptor and if the barrier is constructed in a manner that eliminates any cracks or gaps.
- If stationary noise-generating equipment is located near receptors, adequate muffling (with enclosures where feasible and appropriate) shall be used. Any enclosure openings or venting shall face away from sensitive receptors.
- Construction staging areas (including material stockpiles, maintenance/equipment staging, and parking areas) shall be established at locations that would create the greatest distance between the construction-related noise sources and noise-sensitive residential receptors nearest the project site during all project construction.
- Generators, compressors, and pumps shall be housed in acoustical enclosures.
- Where feasible, temporary power service from local utility companies should be used instead of portable generators.
- Locate cranes as far from adjoining noise-sensitive residential receptors as possible.
- During final grading, substitute graders for bulldozers. Wheeled heavy equipment are quieter than track equipment.
- Substitute nail guns for manual hammering.
- Avoid the use of circular saws, miter/chop saws, and radial arm saws near the adjoining noise-sensitive residential receptors. Shield saws with a solid screen with material having a minimum surface density of two pounds per square feet (e.g., such as \( \frac{3}{4} \)-inch plywood).
- Substitute electrically-powered tools for noisier pneumatic tools.
- Maintain smooth vehicle pathways for trucks and equipment accessing the site, and avoid local residential neighborhoods as much as possible.
- During interior construction, the exterior windows facing noise-sensitive receptors shall be closed.
- During interior construction, noise-generating equipment shall be located within the building to break the line-of-sight to the adjoining receptors.
- The contractor shall be required to prepare a schedule for major noise-generating construction activities. The construction plan shall identify a procedure for coordination with adjacent residential land uses so that construction activities can be scheduled to minimize noise disturbance.
- Designate a “disturbance coordinator” who would be responsible for responding to any complaints about construction noise. The disturbance coordinator would determine the cause of the noise complaint (e.g., bad muffler, etc.) and would require that reasonable measures be implemented to correct the problem.
Conspicuously post a telephone number for the disturbance coordinator at the construction site and include in it the notice sent to neighbors regarding the construction schedule.

**MM NOI-1.2:** Mechanical equipment shall be selected and designed to reduce impacts on surrounding uses to meet ambient noise conditions at the nearest residential land uses during both daytime and nighttime conditions. A qualified acoustical consultant shall be retained to review mechanical noise as these systems are selected to determine specific noise reduction measures necessary to comply with the City’s noise level requirements. Noise reduction measures could include, but are not limited to, selection of equipment that emits low noise levels and/installation of noise barriers, such as enclosures and parapet walls, to block the line-of-sight between the noise source and the nearest receptors. Alternate measures may include locating equipment in less noise-sensitive areas, such as indoors or the rooftop of the buildings away from the building’s edge nearest the noise-sensitive receptors.

The City finds that Mitigation Measures NOI-1.1 and NOI-1.2 are feasible, are adopted, and will further reduce impacts associated with this issue to a level of less than significant. Accordingly, the City finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant impacts of the proposed project related to this issue.

**Impact NOI-2:** The project would result in generation of, excessive groundborne vibration or groundborne noise levels.

**Finding:** The project, in compliance with General Plan Program PS-63 and with the implementation of mitigation measures MM NOI-1.1 and MM NOI-2.1, would reduce noise impacts from construction-related vibration to a less than significant level. *(Less than Significant Impact with Mitigation Incorporated)* Changes or alterations have been required in, or incorporated into, the Project, which avoid or substantially lessen the significant environmental effects as identified in the EIR. *(State CEQA Guidelines, section 15091(a) (1).)*

**Facts in Support of Finding:** The project, in compliance with General Plan Program PS-63 and with the implementation of mitigation measures MM NOI-1.1 and MM NOI-2.1, would reduce construction-generated vibration levels at the residences to the west of the project site to a less than significant level by limiting construction hours, prohibiting use of heavy vibration-generating equipment near residences to the west, and informing heavy equipment operators to be cognizant of activities near residences to the west *(pages 123-124 of the Draft EIR)*

**MM NOI-2.1:** In addition to the noise controls outlined in General Plan Program PS-63 and mitigation measure MM NOI-1.1, the project shall implement the following measures where vibration levels due to construction activities would exceed 0.3 in/sec PPV at nearby sensitive uses:

- Prohibit the use of heavy vibration-generating construction equipment within 20 feet of the structures located adjacent to the project site.
- The contractor shall alert heavy equipment operators to the close proximity of the adjacent structures so they can exercise extra care.

The City finds that Mitigation Measures NOI-1.1 and NOI-2.1 are feasible, are adopted, and will further reduce impacts associated with this issue to a level of less than significant. Accordingly, the City finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been
required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant impacts of the proposed project related to this issue.

Impact NOI-C: The project would result in a cumulatively considerable contribution to a significant noise (i.e., construction) impact.

Finding: The project, in conformance with General Plan Program PS-63 and with the implementation of the mitigation measure MM NOI-1.1, would reduce its cumulatively considerable contribution to a significant cumulative construction noise impact to a less than significant level. (Less than Significant Cumulative Impact with Mitigation Incorporated) Changes or alterations have been required in, or incorporated into, the Project, which avoid or substantially lessen the significant environmental effects as identified in the EIR. (State CEQA Guidelines, section 15091(a) (1).)

Facts in Support of Finding: The Westside Renovation/Magical Bridge Playground at Red Morton Park project, which is currently under construction, is scheduled to be completed in December 2019. The proposed project is expected to start construction in January 2020. While the construction from the two projects would not be concurrent, the surrounding residences would be exposed to continual construction due to the two projects, which would extend disruption due to construction noise. However, the project, in conformance with General Plan Program PS-63 and with the implementation of mitigation measure MM NOI-1.1 above, would reduce its cumulatively considerable contribution to a significant cumulative construction noise impact to a less than significant level by restricting construction hours, controlling noise from construction activities and equipment, notifying and coordinating with nearby residences, and designating a disturbance coordinator to address noise complaints. In addition, the project does not propose the use of high-intensity construction equipment, such as pile drivers. Other cumulative projects may be under construction concurrently with the proposed project, but are within 1,000 feet of the project site. Therefore, this construction would not measurably contribute to the noise levels expected from project-generated construction. The facts to support this finding are further identified and described on pages 124 through 125 of the Draft EIR.

See MM NOI-1.1 above
The City finds that Mitigation Measure NOI-1.1 is feasible, is adopted, and will further reduce impacts associated with this issue to a level of less than significant. Accordingly, the City finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant impacts of the proposed project related to this issue.

Transportation/Traffic

Impact TRN-1: The project would conflict with a program plan, ordinance or policy addressing the circulation system (specifically the level of service at Intersection 9 under background plus project conditions).

Finding: The implementation of mitigation measures MM TRN-1.1 would reduce the project’s impact at Intersection 9 to a less than significant level. (Less than Significant Impact with Mitigation Incorporated). Changes or alterations have been required in, or incorporated into, the Project, which avoid or substantially lessen the significant environmental effects as identified in the EIR. (State CEQA Guidelines, section 15091(a) (1).)
Facts in Support of Finding: Implementation of mitigation measures MM TRN-1.1 would reduce the average delay at this intersection from an unacceptable 37.5 seconds (LOS E) to an acceptable 25.8 seconds (LOS C) in the AM peak hour. Additionally, it is likely that the grid street network in the neighborhood would facilitate alternatives routes to and from the project site, if this intersection become chronically over-congested during the AM peak hour. The advantage of the grid street network in the neighborhood is that it offers many alternate routes to drivers, and the projected delay at this intersection under background plus project conditions may not actually occur. These facts are further analyzed on page 156 of the Draft EIR and pages 6 through 10 of the Final EIR.

MM TRN-1.1: Within one year of full buildout and occupancy of the project, the City shall complete a traffic operations study to monitor Intersection 9, Valota Road and Roosevelt Avenue, and the project proponents shall signalize the intersection if the peak hour traffic signal warrant is met and the level of service deteriorates to an unacceptable level of service.

The City finds that Mitigation Measure TRN-1.1 is feasible, is adopted, and will further reduce impacts associated with this issue to a level of less than significant. Accordingly, the City finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant impacts of the proposed project related to this issue.

Impact TRN-C: The project would result in a cumulatively considerable contribution to a significant transportation impact at Intersection 5 (Valota Road and Jefferson Avenue) and Intersection 9 (Valota Road and Roosevelt Avenue).

MM TRN-C.1: The project shall add a refuge lane on Jefferson Avenue for drivers turning left onto Jefferson Avenue from Valota Road.

Finding: The implementation of mitigation measures MM TRN-1.1 and MM TRN-C.1 would reduce the project’s significant cumulative impacts at Intersections 5 and 9 to a less than significant level. (Less than Significant Impact with Mitigation Incorporated). Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effects as identified in the EIR. (State CEQA Guidelines, section 15091(a) (1).)

Facts in Support of Finding: The project, with the implementation mitigation measure MM TRN-1.1, would reduce the average delay at the Valota Road and Roosevelt Avenue intersection from an unacceptable 52.3 seconds (LOS F) to an acceptable 28.5 seconds (LOS C) during the AM peak hour and from an unacceptable 41.8 seconds (LOS E) to an acceptable 26.8 (LOS C) during the PM peak hour under cumulative plus project conditions. With regard to the intersection at Valota Road and Jefferson Avenue, there is sufficient curb-to-curb width within the existing roadway to accommodate the refuge lane by narrowing the center median and restriping. With installation of the refuge lane, the calculated delay would improve from 46.4 seconds (LOS E) to acceptable 28.6 seconds (LOS D) in the AM peak hour under cumulative plus project conditions and mitigate the project’s cumulative impact to less than significant level. The facts in supports of this finding are described on pages 161 through 163 of the Draft EIR.

See MM TRN-1.1 above
The City finds that Mitigation Measure TRN-1.1 is feasible, is adopted, and will further reduce impacts associated with this issue to a level of less than significant. Accordingly, the City finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant impacts of the proposed project related to this issue.

**SECTION III  
IMPACTS THAN CANNOT BE FULLY MITIGATED TO A LESS THAN SIGNIFICANT LEVEL**

The City Council hereby finds that, despite the incorporation of Mitigation Measures identified in the EIR and in these Findings, the following environmental impacts cannot be fully mitigated to a less than significant level and a Statement of Overriding Considerations is therefore included herein:

**Impact CUL-1:** The project would cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5.

**Finding:** The implementation of the mitigation measures MM CUL-1.1 and MM CUL-1.2 would reduce the project’s significant impact a historic resource, but not to a less than significant level. Significant and Unavoidable Impact with Mitigation Incorporated) Changes or alterations have been required in, or incorporated into, the project, which attempt to avoid or substantially lessen the significant environmental effects identified in the EIR. (State CEQA Guidelines, section 15091(a) (1).) However, impacts would still remain significant and unavoidable. Specific economic, legal, social, technological, or other considerations, as identified in the EIR and elsewhere in the record, make infeasible the mitigation measure or project alternatives identified in the EIR. (State CEQA Guidelines, section 15091(a) (3).)

**Facts in Support of Finding:** The project, with implementation of the mitigation measures MM CUL-1.1 and CUL-1.2, would reduce its impact to the historic resource by documenting and commemorating the building. This documentation will be completed prior to issuance of any demolition or grading permits and shall comply with Historic American Buildings Survey (HABS) Level II and shall also comply with the Secretary of the Interior’s Standards for Architectural and Engineering Documentation. In addition, the City will be responsible for the production and placement of an interpretive display in the new VMSC/YMCA facility that describes the history and significance of the senior center, using photographs, materials and drawings in addition to narrative text. The full requirements for documentation and display are further outlined on pages 56 through 57 of the Draft EIR. Members of the City’s Historic Resources Advisory Committee (HRAC) have been invited to comment on the documentation process and have also been involved in discussion regarding the creation of the interpretive display in the new VMSC/YMCA facility and have provided comments on what the materials that should be included in the display from the historic resource. However, as the historic resource would be demolished, the impact is considered significant and unavoidable.

**MM CUL-1.1:** Prior to issuance of any demolition or grading permits, the City shall document the senior center. The documentation shall be in the form of a Historic American Buildings Survey (HABS) Level II and shall comply with the Secretary of the Interior’s Standards for Architectural and Engineering Documentation. The documentation shall include drawings, photographs and a narrative overview:

- Drawings: Existing historic drawings of the senior center, if available, shall be photographed with large-format negatives or photographically reproduced on Mylar.
Photographs: Photo-documentation of the exterior of the senior center shall be prepared to HABS standards for archival photography. Key views of the building’s interior should also be included in the photo-documentation.

Historical Overview: A detailed narrative description of the building and its history shall be prepared. It is anticipated that much of this information will be drawn from the Historic Resource Report that Diana Painter completed for the VMSC in 2010.

The documentation shall be completed by a historian or architectural historian meeting the Secretary of the Interior’s Professional Qualification Standards for History and/or Architectural History. To ensure its public accessibility, the completed documentation shall be filed with the Redwood City Public Library for inclusion in their local history collection, as well as with the San Mateo County History Museum.

In addition, the City shall consult with the local historical societies regarding salvage of materials from the VMSC building for public information (such as in the interpretive display described below in mitigation measure MM CUL-1.2) or reuse in other locations. This consultation shall focus on identifying building features or elements that are (1) related to the character-defining features and (2) can feasibly be removed from the building.

**MM CUL-1.2:** The City shall be responsible for the production and placement of an interpretive display in the new VMSC/YMCA facility that describes the history and significance of the senior center, using photographs and drawings in addition to narrative text. The display shall be placed in a prominent space within the new building.

Recreation

**Impact REC-2:** The project would include recreational facilities or require the construction or expansion of recreational facilities, which may have an adverse physical effect on the environment.

**Finding:** The implementation of the mitigation measures MM CUL-1.1 and MM CUL-1.2 would reduce the project’s significant impact a historic resource from the construction of a recreational facility, but not to a less than significant level. (Significant and Unavoidable Impact with Mitigation Incorporated). Changes or alterations have been required in, or incorporated into, the project, which attempt to avoid or substantially lessen the significant environmental effects identified in the EIR. (State CEQA Guidelines, section 15091(a) (1).) However, impacts would still remain significant and unavoidable. Specific economic, legal, social, technological, or other considerations, as identified in the EIR and elsewhere in the record, make infeasible the mitigation measure or project alternatives identified in the EIR. (State CEQA Guidelines, section 15091(a) (3).)

**Facts in Support of Finding:** The project, with implementation of the mitigation measures MM CUL-1.1 and CUL-1.2, would reduce its impact to the historic resource by documenting and commemorating the building. This documentation will be completed prior to issuance of any demolition or grading permits and shall comply with Historic American Buildings Survey (HABS) Level II and shall also comply with the Secretary of the Interior’s Standards for Architectural and Engineering Documentation. In addition, the City will be responsible for the production and placement of an interpretive display in the new VMSC/YMCA facility that describes the history and significance of the senior center, using photographs, materials and drawings in addition to narrative text. The full requirements for documentation and display are further outlined on pages 56 through 57 of the Draft EIR. Members of the City’s Historic Resources Advisory Committee (HRAC) have been invited to comment on the documentation process and have also been involved in discussion regarding the creation of the interpretive display in the new VMSC/YMCA.
facility and have provided comments on what the materials that should be included in the display from the historic resource. However, as the historic resource would be demolished, the impact is considered significant and unavoidable.

See MM CUL-1.1 and MM CUL-1.2 above

SECTION IV: FINDINGS REGARDING SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES.

Sections 15126(c) and 15126.2(c) of the CEQA Guidelines require that an EIR address any significant irreversible environmental changes that would occur should the project be implemented. Generally, a project would result in significant irreversible environmental changes if any of the following would occur:

- The project would involve a large commitment of non-renewable resources;
- The primary and secondary impacts of the project would generally commit future generations to similar uses;
- The project involves uses in which irreversible damage could result from any potential environmental accidents; or
- The proposed consumption of resources is not justified.

During construction and operation, the project would require the use and consumption of nonrenewable resources. Unlike renewable resources, nonrenewable resources cannot be regenerated over time. Nonrenewable resources include fossil fuels and metals. Renewable resources, such as lumber and other wood byproducts, could also be used.

Energy, as discussed in more detail in Section 3.6 of the Draft EIR, would be consumed during both the construction and operational phases of the project. The construction phase would require the use of nonrenewable construction material, such as concrete, metals, and plastics, and glass. Nonrenewable resources and energy would also be consumed during the manufacturing and transportation of building materials, preparation of the site, and construction of the buildings. The operational phase would consume energy for multiple purposes including building heating and cooling, lighting, appliances, and electronics. Energy, in the form of fossil fuels, would be used to fuel vehicles traveling to and from the project site.

The project would result in a substantial increase in demand for nonrenewable resources. The project, however, is subject to the standard California Code of Regulations Title 24 Part 6 and CALGreen energy efficiency requirements. In addition, as described in Section 2.0, the project would meet a minimum LEED Certification standards. For these reasons, the project would minimize the use of nonrenewable energy resources.

The project would be developed on a site that is already fully developed for urban uses. Development of the project would commit resources to prepare the site, construct the buildings, and operate them, but it would not result in development of a previously undeveloped area.

The project does not propose any new or uniquely hazardous uses and, consistent with current operation of the VMSC and YMCA, its operation would not cause environmental accidents that would impact other areas. As discussed in Section 3.9 Hazards and Hazardous Materials of the Draft EIR, there would be no significant hazards and hazardous materials conditions on-site or off-site that would substantially affect the public and surrounding environment. There
would be no significant geology and soils impacts from implementation of the project. For these reasons, the project would not result in irreversible damage that may result from environmental accidents. (Draft EIR, pp. 182-183.)

SECTION V: FINDINGS REGARDING GROWTH-INDUCING IMPACTS.

Section 15126.2(d) of the State CEQA Guidelines requires a Draft EIR to discuss the ways the Project could foster economic or population growth or the construction of additional housing, directly or indirectly, in the surrounding environment. In accordance with State CEQA Guidelines Section 15126.2(d), a Project would be considered to have a growth-inducing effect if it would:

- Directly or indirectly foster economic or population growth, or the construction of additional housing in the surrounding environment;
- Remove obstacles to population growth (e.g., construction of an infrastructure expansion to allow for more construction in service areas);
- Tax existing community service facilities, requiring the construction of new facilities that could cause significant environmental effects; or
- Encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively.

The project would replace existing facilities and relocate existing uses (i.e., the Sequoia YMCA) onsite. The proposed traffic calming measures facilitate safer (i.e., slower) vehicular circulation, and do not foster growth. For these reasons, the project would not foster or stimulate substantial economic growth or population growth (refer to the discussion in Section 3.14 Population and Housing of the Draft EIR) in the surrounding environment. **(Less than Significant Impact)** (Draft EIR, p. 181.)

SECTION VI: FINDINGS REGARDING ALTERNATIVES

Where significant impacts are identified, section 15126.6 of the State CEQA Guidelines requires EIRs to consider and discuss alternatives to the proposed actions. Subsection (a) states:

(a) An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives, which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.

Subsection 15126.6(b) states the purpose of the alternatives analysis:

(b) Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.
In subsection 15126.6(c), the State CEQA Guidelines describe the selection process for a range of reasonable alternatives:

(c) The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the Project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency’s determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

The range of alternatives required is governed by a “rule of reason” that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed Project. Alternatives are limited to ones that would avoid or substantially lessen any of the significant effects of the Project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the Project.

A. Project Objectives.

The Final EIR evaluates a number of potential alternatives to the proposed project. The Final EIR examines the environmental impacts of each alternative in comparison with the proposed project and the relative ability of each alternative to satisfy project objectives. The project objectives are as follows:

1. Replace the aging VMSC and reduce escalating maintenance costs with a new approximately 45,000 square foot Veterans Memorial Building/Senior Center to enhance the existing seniors’ programs and have spaces including a special veterans exhibits honoring Redwood City and San Mateo County veterans and office space for non-profit groups and the NFL Alumni Northern California Chapter.
2. Form a public/non-profit partnership with the YMCA to re-imagine the aging Veterans Memorial Senior Center and Sequoia YMCA to meet the changing health living, recreational and social needs of seniors, veterans, youth and families and ensure the Sequoia YMCA is able to remain in Redwood City.
3. Enhance and expand the existing membership at the Sequoia YMCA by providing a new approximately 35,000 square foot YMCA with a fitness center, multipurpose rooms, indoor and outdoor pools and a childcare facility open to the public.
4. Provide year round aquatics with new indoor and outdoor swimming pools, as the City is currently only able to offer seasonal use of an aging center with growing maintenance costs.
5. Enhance the community quality of life by expanding health and wellness opportunities for all ages and enhancing the community’s fitness, wellness, and recreation resources.
6. Provide state-of-the art community facility with multiple recreational opportunities for a growing community – both in population and age.
7. Provide a public promenade with flexible outdoor gathering spaces that would provide a gateway to Red Morton Park and link both buildings.
8. Design the new VMSC to meet a minimum of LEED Certification standards.
9. Provide a new public facility that could have the dual purpose of providing an emergency shelter or evacuation center in the event of an emergency.
10. Implement traffic calming measures near Red Morton Community Park to facilitate safer and slower vehicle circulation.

The Final EIR also describes the criteria used to identify a range of reasonable alternatives for review in the EIR and describes proposals that the City concluded did not merit additional more detail-oriented review because they did not present viable alternatives to the proposed project.

In making these findings, the City Council certifies that it has independently reviewed and considered the information on alternatives provided in the Final EIR including the information provided in comments on the Draft EIR and the responses to those comments in the Final EIR. The Final EIR discussion and analysis of the alternatives in the Final EIR is incorporated in these findings by reference.

The City Council may reject the alternative if it is determined that specific considerations make the alternative infeasible. Pursuant to California Public Resources Code Section 21081 and the CEQA Guidelines Section 15091 et seq., the City Council adopts and makes the following findings with respect to the alternatives identified in the Final EIR, as described below.

B. Alternatives Considered But Rejected From More Detailed Analysis

Section 15126.6(c) of the State CEQA Guidelines specifies that an EIR should (1) identify alternatives that were considered by the lead agency but were eliminated from detailed consideration because they were determined to be infeasible during the scoping process; and (2) briefly explain the reasons underlying the lead agency’s determination. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives; (ii) infeasibility; and/or (iii) inability to avoid significant environmental impacts.

The following alternatives were considered but rejected as part of the environmental analysis for the Project:

- **Alternative Location**: The City considered alternative locations for the proposed project to avoid or lessen the project’s air quality, biological resources, cultural resources, noise, and recreation impacts. A feasible alternative location would be of similar size to the project site, within the jurisdictional boundaries of the City, and have the appropriate General Plan land use designation. There are not suitable locations meeting the criteria other than Red Morton Community Park. For these reasons, an alternative location to the project site was considered but rejected as infeasible.

- **YMCA Alternative Location at Red Morton Community Park**: An alternative location for the proposed YMCA elsewhere at Red Morton Community Park was considered in order to avoid the project’s significant and unavoidable impact to a historic resource. Given the construction of the Westside Renovation/Magical Bridge Playground at Red Morton Park project on the southwestern portion of the park, there are no underutilized areas of the park in which the YMCA could be developed. For this reason, this alternative was considered but rejected as infeasible.

**Finding**: The City Council rejects the Alternative Location and YMCA Alternative Location at Red Morton Community Park alternatives, on the following grounds, each of which individually provides sufficient justification for rejection of this alternative: (1) the alternatives are technically, financially, and legally infeasible given that there are not alternative sites suitable for the project and there are no other underutilized areas of the park in which the YMCA could be developed. Therefore, these alternatives are eliminated from further consideration.
C. Evaluation of Alternatives Selected for Analysis

The alternatives selected for further detailed review within the EIR focus on alternatives that could the Project’s significant environmental impacts, while still meeting most of the basic Project objectives. Those alternatives are discussed below.

No Project Alternative

**Description:** Under the No Project Alternative, the project site could remain, as it is today – developed with the existing VMSC, Sid Herkner Pool, and NFL Alumni Association building.

**Comparison to the Project:** The No Project Alternative would avoid all of the project’s environmental impacts and traffic calming benefits that would result from the implementation of the proposed project. The No Project Alternative would not meet any of the project objectives of replacing the aging VMSC (objective 1), forming a partnership with the YMCA (objective 2), providing a new YMCA facility (objective 3), providing year-round aquatics (objective 4), expanding health and wellness opportunities (objective 5), providing a community facility with multiple recreation opportunities for all (objective 6), providing a new public promenade (objective 7), providing a new public facility that could provide shelter in the event of an emergency (objective 9), and implementing traffic calming measures near the park (objective 10).

**Finding:** The No Project Alternative would avoid all of the project’s environmental impacts and traffic calming benefits, but would not meet any of the project objectives. For the foregoing reason, the No Project Alternative is hereby rejected.

Preservation Alternative

**Description:** Under the Preservation Alternative, the proposed VMSC would be constructed as proposed and the proposed YMCA would involve the preservation of historic portions of the existing VMSC building and setting and construction of a new addition to the preserved portion of the existing VMSC building.

Instead of demolishing the entire VMSC building to construct the proposed YMCA, the VMSC building would be retained and preserved except for the southern (theater) wing, which can be demolished without substantially affecting the historic integrity of the building. In addition, no new construction would be located on the lawn and open space areas immediately north and west of the VMSC building. Rehabilitation and new construction would occur to meet the total proposed square footage of 35,000 square feet for the YMCA and would adhere to the following measures:

- Prior to issuance of site or construction permits related directly to the Veterans Memorial Building, proposed plans for the rehabilitation of those buildings would be submitted to the Redwood City Community Development Department for review and approval. Any exterior alterations would be conducted in accordance with the Secretary of the Interior’s Standards for Rehabilitation and undertaken with the assistance of a historic preservation architect meeting the Secretary of the Interior’s Standards Professional Qualifications Standards. The historic preservation architect shall regularly evaluate the ongoing renovation to ensure it continues to satisfy the Standards. The historic preservation architect would submit status reports to the Redwood City Community Development Department according to a schedule agreed upon prior to commencement of the work.
- Prior to issuance of site or construction permits, proposed plans for new construction on site shall be submitted to the Redwood City Community Development Department for review and approval. Said permits shall only be issued after it has been confirmed that the design of the new construction is in conformance with the
Secretary of the Interior’s Rehabilitation Standard 9 and, in particular, is compatible with the design of the Veterans Memorial Building.

This alternative would preserve the building’s primary public facades, as well as the open space between those facades and Madison Avenue and St. Francis Street. Under this alternative, it is assumed that little to no modifications of the building’s exterior features would be made. This project alternative would avoid the project’s significant and unavoidable impact to a historic resource.

**Comparison to the Project:** The Preservation Alternative would avoid the project’s significant and unavoidable cultural resources and recreation impacts from demolishing a historic resource (the existing senior center). This alternative would modify the historic resource while preserving the historic portions of the resource. For this reason, this alternative would result in a less than significant impact to the historic resource. This alternative would result in the same or similar impacts to all other environmental resources as the proposed project.

**Finding:** The Preservation Alternative would avoid the project’s significant and unavoidable impacts related to demolishing a historic resource and result in the same or similar impacts to all other environmental resources as the proposed project. However, this alternative does not meet all of the project’s objectives, including reducing escalating maintenance costs (objective 1) as the preservation alternative building would not be able to be constructed with the same energy efficient measures as the proposed building (net zero ready and LEED Platinum) and could not provide a state-of-the-art community facility with multiple recreational opportunities (objective 6). Additionally, throughout the community outreach process, it was identified by the community that a new facility would be preferred to produce a multi-generation state-of-the-art facility. For these reasons, the Preservation Alternative is hereby rejected.

Sequoia YMCA Site Redevelopment Alternative

**Description:** Under the Sequoia YMCA Site Redevelopment Alternative, the proposed VMSC would be constructed as proposed on the project site, the proposed traffic calming measures would be constructed as proposed, and the proposed YMCA would be constructed where the existing Sequoia YMCA is currently at Palm Park.

**Comparison to the Project:** The Sequoia YMCA Site Redevelopment Alternative would avoid the project’s significant and unavoidable impacts related to demolishing a historic resource. This alternative would result in no impact to the historic resource. This alternative would result in a similar amount of total construction and demolition on two sites (the project site and the existing Sequoia YMCA site), therefore, this alternative would result in similar impacts to all other environmental resources as the proposed project.

While generally not considered an environmental impact under CEQA, parking supply is a concern with this alternative. Given the size of the existing Sequoia YMCA site (65,970 square feet or 1.5 acres) and size of the proposed YMCA (35,000 square feet), limited area would be available on the site for surface parking. Either underground or above ground structured parking would be required, which would result in a greater total air pollutant emissions and could result in a greater level of noise compared to the proposed project.

**Finding:** The Sequoia YMCA Site Redevelopment Alternative would avoid the project’s significant and unavoidable impacts related to demolishing a historic resource and result in similar impacts as the project on all other environmental resources. This alternative could meet all of the project objectives except for objective 2 of forming a partnership between the City and YMCA. However, if a parking structure is required, the Sequoia YMCA Site Redevelopment Alternative would result in greater impacts to noise and air quality than the project. For the foregoing reasons, the Sequoia YMCA Site Redevelopment Alternative is hereby rejected.
D. Environmentally Superior Alternative.

The CEQA Guidelines state that an EIR shall identify an environmentally superior alternative. The environmentally superior alternative to the project is the No Project Alternative because all of the project’s significant environmental impacts would be avoided. Section 15126.6(c) (2), however, states that “if the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmental superior alternative among the other alternatives.” In addition to the No Project Alternative, Sequoia YMCA Site Redevelopment Alternative would be environmentally superior to the project, as it would preserve the VMSC as is.

SECTION VII
STATEMENT OF OVERRIDING CONSIDERATIONS

Pursuant to California Public Resources Code Section 21081 and the CEQA Guidelines Section 15093 et seq., the Council adopts and makes the following statement of overriding considerations regarding the unavoidable impacts of the project and the anticipated benefits of the project.

Significant and Unavoidable Impacts

With respect to the foregoing findings and in recognition of those facts, which are included in the record, the Council has determined that the project would cause significant and unavoidable impacts, as set forth above, to a historic resource (refer to Impact CUL-1 and Impact REC-2).

The project, with implementation of the mitigation measures MM CUL-1.1 and CUL-1.2, would reduce its impact to the historic resource by documenting and commemorating the building. Since the historic resource would be demolished, the impact is considered significant and unavoidable.

Overriding Considerations

Pursuant to State CEQA Guidelines Section 15093(a), the City Council must balance, as applicable, the economic, legal, social, technological, or other benefits of the Project against its unavoidable environmental risks in determining whether to approve the project. If the specific benefits of the project outweigh the unavoidable adverse environmental effects, those environmental effects may be considered acceptable.

Having reduced the adverse significant environmental effects of the Project to the extent feasible by adopting the mitigation measures; having considered the entire administrative record on the project; the City Council has weighed the benefits of the Project against its unavoidable adverse impacts after mitigation in regards to historic resources. While recognizing that the unavoidable adverse impacts are significant under CEQA thresholds, the City Council nonetheless finds that the unavoidable adverse impacts that will result from the project are acceptable and outweighed by specific social, economic and other benefits of the project.

In making this determination, the factors and public benefits specified below were considered. Any one of these reasons is sufficient to justify approval of the project. Thus, even if a court were to conclude that not every reason is supported by substantial evidence, the City Council would be able to stand by its determination that each individual reason is sufficient. The substantial evidence supporting the various benefits can be found in the preceding findings, which are incorporated by reference into this section, and in the documents found in the Records of Proceeding.
The City Council therefore finds that for each of the significant impacts which are subject to a finding under CEQA Section 21081(a) (3), that each of the following social, economic, and environmental benefits of the Project, independent of the other benefits, outweigh the potential significant unavoidable adverse impacts and render acceptable each and every one of these unavoidable adverse environmental impacts:

- Replace an aging building with multi-generational facilities and reduce escalating maintenance costs;
- Form and public/non-profit partnership with the YMCA to re-imagine the aging facilities and meet the changing health living, recreational and social needs of seniors, veterans, youth and families;
- Ensure the YMCA is able to remain in Redwood City and enhance and expand the existing Sequoia YMCA membership, while enhancing the community’s fitness, wellness and recreational resources;
- Provide year round aquatics, where the City is currently only able to offer seasonal use of an aging center with growing maintenance costs;
- Provide a public promenade with flexible outdoor gather spaces that would provide a gateway to Red Morton Park;
- Provide a new public facility that could have dual purpose of providing an emergency shelter or evacuation center in the event of an emergency.
- Implement traffic calming measures near Red Morton Community Park to facilitate safer and slower vehicle traffic

Conclusion

The Council has weighed the above benefits of the proposed project against its significant and unavoidable environmental effects identified in the Final EIR and hereby determines that each of these benefits outweighs the adverse environmental effects and, therefore, further determines that the significant and unavoidable environmental effects of the project is acceptable.
This Draft Mitigation Monitoring and Reporting Program ("MMRP") is formulated based upon the findings of the Environmental Impact Report ("EIR") prepared for the Veterans Memorial Senior Center/YMCA project ("project"). The MMRP lists mitigation measures recommended in the EIR prepared for the proposed project and identifies mitigation monitoring requirements. The Final MMRP must be adopted when the City of Redwood City ("City") makes a final decision on the project.

This MMRP has been prepared to comply with the requirements of state law (Public Resources Code Section 21081.6). State law requires the Lead Agency to adopt an MMRP when mitigation measures are required to avoid significant impacts. The MMRP is intended to ensure compliance with the mitigation measures identified in the EIR during implementation of the project.

The MMRP is organized in a matrix format. The first two columns of the table identify the potential impacts and corresponding mitigation measures. The third column, entitled Timeframe for Implementation, refers to when monitoring will occur to ensure that the mitigating action is completed. The fourth column, entitled Responsibility for Implementation, refers to the party responsible for implementing the mitigation measure. The fifth column, entitled, Oversight of Implementation, refers to the party responsible for oversight or ensuring that the mitigation measure is implemented.
Section 21081.6 of the California Environmental Quality Act (CEQA) requires a Lead Agency to adopt a Mitigation Monitoring or Reporting Program (MMRP) whenever it approves a project for which measures have been required to mitigate or avoid significant effects on the environment. The purpose of the monitoring and reporting program is to ensure compliance with the mitigation measures during project implementation.

The Environmental Impact Report (EIR) prepared for the Veterans Memorial Senior Center/YMCA Project concluded that the implementation of the project could result in significant effects on the environment and mitigation measures were incorporated into the proposed project. This MMRP addresses those measures in terms of how and when they will be implemented.

This document does not discuss those subjects for which the EIR concluded that the impacts from implementation of the project would be less than significant. Project conditions identified in the EIR are listed at the end of the MMRP.

I, __________________, the applicant, on the behalf of ______________________, hereby agree to fully implement the mitigation measures described below which have been developed in conjunction with the preparation of an EIR for my proposed project. I understand that these mitigation measures or substantially similar measures are required of my project to avoid or reduce potential significant environmental impacts.

Project Applicant’s Signature __________________________________________________________

Date ____________________________________________________________________________
### Mitigation Monitoring or Reporting Program

**Veterans Memorial Senior Center/YMCA Project (SCH #2016112041)**

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| **Air Quality** | **MM AIR-3.1:** Prior to issuance of a grading permit, the project shall develop a plan demonstrating that the off-road equipment used on-site to construct the project would achieve a fleet-wide average 55-percent reduction in DPM exhaust emissions or greater. The plan shall be submitted and approved by the City Planning Division. The following are feasible methods:  
- All diesel-powered off-road equipment, larger than 25 horsepower, operating on the site for more than two days continuously shall, at a minimum, meet EPA particulate matter emissions standards for Tier 3 engines with CARB-certified Level 3 Diesel Particulate Filters or equivalent.  
- All diesel-powered off-road equipment, larger than 25 horsepower, operating on the site for more than two days continuously shall meet EPA Tier 4 standards for particulate matter.  
- The use of equipment that includes electric or alternatively-fueled equipment (i.e., non-diesel) would meet the reduction requirement above. | Prior to issuance of a grading permit | Project applicant and contractors | City Planning Division |

Implementation of MM AIR-3.1 would result in a less than significant impact with respect to community risk caused by construction activities. The computed maximum increased lifetime residential cancer risk from construction would be 3.5 in one

**Impact AIR-3:** The project would not expose sensitive receptors to substantial pollutant concentrations with mitigation incorporated.

**Less than Significant Impact with Mitigation Incorporated**
## Mitigation Monitoring or Reporting Program
### Veterans Memorial Senior Center/YMCA Project (SCH #2016112041)

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<tr>
<td><strong>Impact AIR-C</strong>: The project would not result in a cumulatively considerable contribution to a significant air quality impact with mitigation incorporated.</td>
<td>See MM AIR-3.1 above</td>
<td>Same as MM AIR-3.1 above</td>
<td>Same as MM AIR-3.1 above</td>
<td>Same as MM AIR-3.1 above</td>
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### Biology

| Impact BIO-1: The project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in | MM BIO-1.1: Construction shall be scheduled to avoid the nesting bird season to the extent feasible. The nesting season for most birds, including most raptors, in the San Francisco Bay Area extends from February 1 through August 31. If it is not possible to schedule construction activities between September 1 and January 31, then pre-construction surveys for nesting birds shall be completed by a qualified ornithologist to ensure no nest shall be disturbed during project implementation. | Schedule construction between September 1 and January 31, if feasible. If construction activities are | Project applicant | Director of Community Development |

Million or less with implementation of the above mitigation measure (see Table 3.35), which would be below the BAAQMD significance threshold of 10 in one million.
## Mitigation Monitoring or Reporting Program

**Veterans Memorial Senior Center/YMCA Project (SCH #2016112041)**

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<td>local or regional plans, policies, or regulations, or by the CDFW or USFWS with the mitigation incorporated.</td>
<td>This survey shall be completed no more than 14 days prior to the initiation of grading, tree removal, or other demolition or construction activities during the early part of the breeding season (February through April) and no more than 30 days prior to the initiation of these activities during the late part of the breeding season (May through August). During this survey, the ornithologist shall inspect all trees and other possible nesting habitats within and immediately adjacent to the construction area for nests. If an active nest is found sufficiently close to work areas to be disturbed by construction, the ornithologist, in consultation with CDFW, shall determine the extent of a construction-free buffer zone to be established around the nest to ensure that nests of bird species protected by the MBTA or Fish and Game Code shall not be disturbed during project construction. A final report of nesting birds, including any protection measures, shall be submitted to the Director of Community Development prior to the start of grading or tree removal.</td>
<td>initiated between February and April, conduct the pre-construction survey no more than 14 days prior to construction activities. If construction activities are initiated between May and August, conduct pre-construction surveys no more than 30 days prior to construction activities. Final report shall be completed prior to start of grading or tree removal</td>
<td>Same as MM BIO-1.1 above</td>
<td>Same as MM BIO-1.1 above</td>
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</table>

**Impact BIO-C: The project would not result**

|                                                                 | See MM BIO-1.1 above                                                                 | Same as MM BIO-1.1 above | Same as MM BIO-1.1 above | Same as MM BIO-1.1 above |
### Mitigation Monitoring or Reporting Program

Veterans Memorial Senior Center/YMCA Project (SCH #2016112041)

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<td>in a cumulatively considerable contribution to a significant biological resources impact with mitigation incorporated.</td>
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**Less than Significant Impact with Mitigation Incorporated**

| Impact CUL-1: The project would cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5, even with mitigation incorporated. | MM CUL-1.1: Prior to issuance of any demolition or grading permits, the City shall document the senior center. The documentation shall be in the form of a Historic American Buildings Survey (HABS) Level II and shall comply with the Secretary of the Interior’s Standards for Architectural and Engineering Documentation. The documentation shall include drawings, photographs and a narrative overview: | | | |
| - Drawings: Existing historic drawings of the senior center, if available, shall be photographed with large-format negatives or photographically reproduced on Mylar. | Prior to issuance of any demolition or grading permits | Project applicant | Director of Community Development |

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| Significant and Unavoidable Impact with Mitigation Incorporated | • Photographs: Photo-documentation of the exterior of the senior center shall be prepared to HABS standards for archival photography. Key views of the building’s interior should also be included in the photo-documentation.  
• Historical Overview: A detailed narrative description of the building and its history shall be prepared. It is anticipated that much of this information will be drawn from the Historic Resource Report that Diana Painter completed for the VMSC in 2010.  
  
The documentation shall be completed by a historian or architectural historian meeting the Secretary of the Interior’s Professional Qualification Standards for History and/or Architectural History. To ensure its public accessibility, the completed documentation shall be filed with the Redwood City Public Library for inclusion in their local history collection, as well as with the San Mateo County History Museum.  
In addition, the City shall consult with the local historical societies regarding salvage of materials from the VMSC building for public information (such as in the interpretive display described below in mitigation measure MM CUL-1.2) or reuse in other locations. This consultation shall focus on identifying building features or elements that are (1) related to the character-defining features and (2) can feasibly be removed from the building. | | | | |
## Mitigation Monitoring or Reporting Program

### Veterans Memorial Senior Center/YMCA Project (SCH #2016112041)

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<tr>
<td><strong>MM CUL-1.2:</strong> The City shall be responsible for the production and placement of an interpretive display in the new VMSC/YMCA facility that describes the history and significance of the senior center, using photographs and drawings in addition to narrative text. The display shall be placed in a prominent space within the new building.</td>
<td>Prior to issuance of occupancy permit</td>
<td>City of Redwood City</td>
<td>Director of Community Development</td>
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<tr>
<td><strong>Impact CUL-2:</strong> The project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5 with mitigation incorporated.</td>
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<td><strong>Less than Significant Impact with Mitigation Incorporated</strong></td>
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<td><strong>MM CUL-2.1:</strong> Prior to the issuance of grading permits, the project applicant is responsible for ensuring all construction crews undergo adequate training for the identification of federal or state-eligible cultural resources, and that the construction crews are aware of the potential for previously undiscovered archaeological resources, of the laws protecting these resources and associated penalties, and of the procedures to follow should they discover cultural resources during project-related work.</td>
<td>Prior to the issuance of grading permits</td>
<td>Project applicant</td>
<td>Director of Community Development</td>
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<td><strong>MM CUL-2.2:</strong> A certified archeologist and a culturally affiliated Native American with knowledge of cultural resources shall monitor all ground-disturbing activities. If deposits of prehistoric or historic archeological materials are encountered during project construction activities, all work within an appropriate buffer area (no less than 50 feet) around the discovery shall be stopped and a qualified archeologist meeting federal criteria under 36 CFR 61, in consultation with the culturally affiliated Native American with knowledge of cultural resources, shall be contacted to assess the deposit(s) and make recommendations.</td>
<td>During all ground-disturbing activities</td>
<td>Project applicant</td>
<td>Director of Community Development</td>
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<td>If the deposits are recommended to be non-significant by a qualified archeologist in consultation with the culturally affiliated Native American with knowledge of cultural resources, avoidance is not necessary. If the deposits are determined to be potentially significant by the qualified archeologist in consultation with the culturally affiliated Native American with knowledge of cultural resources, the resources shall be avoided. If avoidance is not feasible, project impacts shall be mitigated in accordance with the recommendations of the qualified archaeologist, in coordination with the City Planning, Housing, and Economic Development Department and CEQA Guidelines Section 15126.4 (b)(3)(C), which requires implementation of a data recovery plan. The data recovery plan shall be prepared and implemented by a qualified archaeologist. The data recovery plan shall include provisions for adequately recovering all scientifically consequential information from and about any discovered archeological materials and include recommendations for the treatment of these resources. In-place preservation of the archeological resource is the preferred manner of mitigating potential impacts, as it maintains the relationship between the resource and the archeological context. In-place preservation also reduces the potential for conflicts with the religious or cultural values of groups associated with the resource. Other mitigation options include, but are not limited to, the full or partial removal</td>
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<td>and curation of the resource. The data recovery plan shall be conducted prior to any additional earth-moving activities in the area of the resource. The recovery plan shall be submitted to the project applicant, the City Planning, Housing, and Economic Development Department, and the Northwest Information Center (NWIC). Once the recovery plan is reviewed and approved by the City Planning, Housing, and Economic Development Department and any appropriate resource recovery completed, project construction activity within the area of the find may resume. A data recovery plan shall not be required for resources that have been deemed by the NWIC as adequately recorded and recovered by studies already completed.</td>
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**Noise**

**Impact NOI-1:** The project would not result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of

**MM NOI-1.1** The project shall develop a construction noise control plan, which shall include, but is not limited to, the following measures:

- If residents surrounding the project site complain about weekend and/or holiday construction noise or if work is disruptive to the adjacent Red Morton Community Park activities occurring on Saturdays, all weekend and holiday construction work shall cease at the City’s discretion, as specified in the allowable construction hours stated in the City’s Municipal Code.
- Construct temporary noise barriers shall be installed, where feasible to screen stationary noise-generating equipment when located within 200 feet of adjoining

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<tr>
<td>Develop a construction noise control plan prior to issuance of grading permits.</td>
<td>Project applicant and contractors</td>
<td>Director of Community Development</td>
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<tr>
<td>Implement the construction noise control plan during construction activities.</td>
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<tr>
<td>Other agencies with mitigation incorporated.</td>
<td>sensitive land uses. Temporary noise barrier fences would provide a five dBA noise reduction if the noise barrier interrupts the line-of-sight between the noise source and receptor and if the barrier is constructed in a manner that eliminates any cracks or gaps.</td>
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<td><em>Less than Significant Impact with Mitigation Incorporated</em></td>
<td>• If stationary noise-generating equipment is located near receptors, adequate muffling (with enclosures where feasible and appropriate) shall be used. Any enclosure openings or venting shall face away from sensitive receptors.</td>
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<td>• Construction staging areas (including material stockpiles, maintenance/equipment staging, and parking areas) shall be established at locations that would create the greatest distance between the construction-related noise sources and noise-sensitive residential receptors nearest the project site during all project construction.</td>
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<td>• Generators, compressors, and pumps shall be housed in acoustical enclosures.</td>
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<td>• Where feasible, temporary power service from local utility companies should be used instead of portable generators.</td>
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<td>• Locate cranes as far from adjoining noise-sensitive residential receptors as possible.</td>
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<td>• During final grading, substitute graders for bulldozers. Wheeled heavy equipment are quieter than track equipment.</td>
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<td>• Substitute nail guns for manual hammering.</td>
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<tr>
<td>• Avoid the use of circular saws, miter/chop saws, and radial arm saws near the adjoining noise-sensitive residential receptors. Shield saws with a solid screen with material having a minimum surface density of two pounds per square feet (e.g., such as ¾-inch plywood).</td>
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<td>• Substitute electrically-powered tools for noisier pneumatic tools.</td>
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<td>• Maintain smooth vehicle pathways for trucks and equipment accessing the site, and avoid local residential neighborhoods as much as possible.</td>
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<td>• During interior construction, the exterior windows facing noise-sensitive receptors shall be closed.</td>
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<tr>
<td>• During interior construction, noise-generating equipment shall be located within the building to break the line-of-sight to the adjoining receptors.</td>
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<td>• The contractor shall be required to prepare a schedule for major noise-generating construction activities. The construction plan shall identify a procedure for coordination with adjacent residential land uses so that construction activities can be scheduled to minimize noise disturbance.</td>
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<td>• Designate a “disturbance coordinator” who would be responsible for responding to any complaints about construction noise. The disturbance coordinator would determine the cause of the noise complaint (e.g., bad muffler, etc.) and would require that reasonable measures be implemented to correct the problem.</td>
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<td>post a telephone number for the disturbance coordinator at the construction site and include in it the notice sent to neighbors regarding the construction schedule.</td>
<td><strong>MM NOI-1.2:</strong> Mechanical equipment shall be selected and designed to reduce impacts on surrounding uses to meet ambient noise conditions at the nearest residential land uses during both daytime and nighttime conditions. A qualified acoustical consultant shall be retained to review mechanical noise as these systems are selected to determine specific noise reduction measures necessary to comply with the City’s noise level requirements. Noise reduction measures could include, but are not limited to, selection of equipment that emits low noise levels and/or installation of noise barriers, such as enclosures and parapet walls, to block the line-of-sight between the noise source and the nearest receptors. Alternate measures may include locating equipment in less noise-sensitive areas, such as indoors or the rooftop of the buildings away from the building’s edge nearest the noise-sensitive receptors.</td>
<td>During the final design phase</td>
<td>Project applicant</td>
<td>Director of Community Development</td>
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<td>The project would not result in generation of, excessive groundborne vibration or groundborne noise</td>
<td><strong>MM NOI-2.1:</strong> In addition to the noise controls outlined in General Plan Program PS-63 and mitigation measure MM NOI-1.1, the project shall implement the following measures where vibration levels due to construction activities would exceed 0.3 in/sec PPV at nearby sensitive uses:</td>
<td>During all construction activities</td>
<td>Project applicant</td>
<td>Director of Community Development</td>
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| levels with mitigation incorporated.                                  | • Prohibit the use of heavy vibration-generating construction equipment within 20 feet of the structures located adjacent to the project site.  
• The contractor shall alert heavy equipment operators to the close proximity of the adjacent structures so they can exercise extra care. |                                                                                   |                                 |                               |
| **Less than Significant Impact with Mitigation Incorporated**          |                                                                           |                              |                                 |                               |
| **Impact NOI-C**: The project would not result in a cumulatively considerable contribution to a significant noise impact with mitigation incorporated. | See MM NOI-1.1 above                                                        | Same as MM NOI-1.1 above       | Same as MM NOI-1.1 above       | Same as MM NOI-1.1 above      |
# Mitigation Monitoring or Reporting Program

Veterans Memorial Senior Center/YMCA Project (SCH #2016112041)

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<td><strong>Recreation</strong></td>
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<td><strong>Impact REC-2:</strong> The project would include recreational facilities or require the construction or expansion of recreational facilities, which may have an adverse physical effect on the environment, even with mitigation incorporated.</td>
<td>See MM CUL-1.1 and MM CUL-1.2 above</td>
<td>Same as MM CUL-1.1 and MM CUL-1.2 above</td>
<td>Same as MM CUL-1.1 and MM CUL-1.2 above</td>
<td>Same as MM CUL-1.1 and MM CUL-1.2 above</td>
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<td><strong>Significant and Unavoidable Impact with Mitigation Incorporated</strong></td>
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<td><strong>Transportation/Traffic</strong></td>
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<td><strong>Impact TRN-1:</strong> The project would not conflict with a program plan, ordinance or policy addressing the circulation system, including transit,</td>
<td>MM TRN-1.1: 1. Within one year of full buildout and occupancy of the project, the City shall complete a traffic operations study to monitor Intersection 9, Valota Road and Roosevelt Avenue, and the project proponents shall signalize the intersection if the peak hour traffic signal warrant is met and the level of service deteriorates to an unacceptable level of service.</td>
<td>Within one year of full buildout and occupancy of the project</td>
<td>City of Redwood City</td>
<td>Director of Community Development</td>
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<tr>
<td>Impacts</td>
<td>Mitigation</td>
<td>Timeframe for Implementation</td>
<td>Responsibility for Implementation</td>
<td>Oversight of Implementation</td>
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<td>roadways, bicycle lanes and pedestrian facilities with mitigation</td>
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<td>incorporated.</td>
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<td><strong>Less than Significant Impact with Mitigation Incorporated</strong></td>
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<td><strong>Impact TRN-C:</strong> The project would not result in a cumulatively</td>
<td>See MM TRN-1.1 above</td>
<td>Same as MM TRN-1.1 above</td>
<td>Same as MM TRN-1.1 above</td>
<td>Same as MM TRN-1.1 above</td>
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<td>considerable contribution to a significant transportation impact with</td>
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<td>mitigation incorporated.</td>
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<tr>
<td><strong>MM TRN-C:</strong> The project shall add a refuge lane on Jefferson Avenue</td>
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<td>for drivers turning left onto Jefferson Avenue from Valota Road.</td>
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<tr>
<td><strong>Less than Significant Impact with Mitigation Incorporated</strong></td>
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</tbody>
</table>
### Conditions of Approval

**Veterans Memorial Senior Center/YMCA Project (SCH #2016112041)**

<table>
<thead>
<tr>
<th>Conditions of Approval</th>
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</thead>
<tbody>
<tr>
<td><strong>Aesthetics</strong></td>
</tr>
<tr>
<td>All new development and redevelopment shall be in compliance with Title 24 Lighting Zone (LZ-3) requirements and submit lighting and photometric site plans for City review and approval prior to issuance of individual building permits prior to issuance of individual building permits.</td>
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<tr>
<td><strong>Air Quality</strong></td>
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<td>During any construction period ground disturbance, the applicant shall ensure that the project contractor implement the following standard BAAQMD BMPs:</td>
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<tr>
<td>• All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.</td>
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<td>• All haul trucks transporting soil, sand, or other loose material off-site shall be covered.</td>
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<td>• All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.</td>
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<td>• All vehicle speeds on unpaved roads shall be limited to 15 miles per hour (mph).</td>
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<tr>
<td>• All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.</td>
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<tr>
<td>• Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.</td>
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<tr>
<td>• All construction equipment shall be maintained and properly tuned in accordance with manufacturer’s specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.</td>
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<tr>
<td>• Post a publicly visible sign with the telephone number and person to contact at the City regarding dust complaints. This person shall respond and take corrective action within 48 hours. BAAQMD’s phone number shall also be visible to ensure compliance with applicable regulations.</td>
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<tr>
<td><strong>Biological Resources</strong></td>
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<td>The project would implement the tree protection recommendations detailed in the arborist report by Deborah Ellis and Advanced Tree Care in Appendix C of the Draft EIR, which includes:</td>
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<td>• Having a certified arborist prepare custom tree protection specifications for each tree to be preserved,</td>
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<tr>
<td>• Completing construction and landscaping work within the dripline of existing trees to be preserved by hand to the extent feasible,</td>
</tr>
<tr>
<td>• Identifying and delineating a Tree Protection Zone (TPZ) for each tree to be preserved and limiting work and new landscaping within the TPZ,</td>
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</tbody>
</table>
### Conditions of Approval

**Veterans Memorial Senior Center/YMCA Project (SCH #2016112041)**

- Having a certified arborist conduct necessary pruning and maintenance of trees prior to construction,

- Irrigating preserved trees appropriately pre- and post-construction.

### Cultural Resource

- The project is required to prepare a cultural resources plan pursuant to the City’s Cultural Resources Management Plan prior to demolition and ground disturbing activities. Per the City’s Cultural Resources Management Plan, the project’s plan would include a summary of background information on the project site, description of the historic resource, analysis of impacts, and measures to reduce impacts to cultural resources.

- General Plan EIR Mitigation Measure 4.5-3b: Prior to the issuance of grading permits, the project applicant is required to ensure all construction crews undergo a training session to inform them of the presence and nature of federal or state-eligible cultural resources and the potential for previously undiscovered human remains within the project area, of the laws protecting these resources and associated penalties, and of the procedures to follow should they discover cultural resources during project-related work.

- General Plan EIR Mitigation Measure 4.5-3a: If human remains are encountered during ground disturbing activities, the project contractor and/or on-site supervisor shall stop work within 50 feet of the discovery. The project contractor shall immediately notify the Coroner upon the discovery of any human remains. At the same time, a qualified archaeologist, in coordination with the City Planning, Housing, and Economic Development Department, shall assess the situation and consult with the appropriate agencies. If the human remains are of Native American origin, the Coroner shall notify the NAHC within 24 hours of this identification. The NAHC will identify a Most Likely Descendant (MLD) to inspect the site and provide recommendations for the proper treatment or disposition, with proper dignity, of the remains and any associated grave goods. Upon completion of the assessment, the qualified archaeologist shall prepare a report documenting the background to the finds, and provide recommendations for the treatment of the human remains and any associated cultural materials, as appropriate and in coordination with the recommendations of the MLD. The report shall be submitted to the project applicant, the City Planning Department, and the NWIC. Once the report is reviewed and approved by the City Planning Department, and any appropriate treatment completed, project construction activity within the area of the find may resume. If the MLD does not make recommendations within 48 hours, the project applicant(s) shall reinter the remains in an area of the property secure from further disturbance. If the project applicant(s) does not accept the MLD’s recommendations, the applicant(s) or the MLD may request mediation by the NAHC.¹

### Hazardous Materials

- A visual inspection/pre-demolition survey, and possible sampling, shall be conducted prior to the demolition of on-site buildings to determine the presence of asbestos-containing materials and/or lead-based paint.

## Conditions of Approval

### Veterans Memorial Senior Center/YMCA Project (SCH #2016112041)

- Prior to demolition activities, all building materials containing lead-based paint shall be removed in accordance with Cal/OSHA Lead in Construction Standard, Title 8, California Code of Regulations 1532.1, including employee training, employee air monitoring, and dust control. Any debris or soil containing lead-based paint or coatings would be disposed of at landfills that meet acceptance criteria for the waste being disposed.

- All potentially friable ACMs shall be removed in accordance with NESHAP guidelines prior to any building demolition or renovation that may disturb the materials. All demolition activities will be undertaken in accordance with Cal/OSHA standards contained in Title 8 of CCR, Section 1529, to protect workers from exposure to asbestos.

- A registered asbestos abatement contractor shall be retained to remove and dispose of ACMs identified in the asbestos survey performed for the site in accordance with the standards stated above.

- Materials containing more than one percent asbestos are also subject to BAAQMD regulations. Removal of materials containing more than one percent asbestos shall be completed in accordance with BAAQMD requirements.

- The project applicant shall screen for materials with PCBs in structures planned for demolition and dispose of the PCB material appropriately in compliance with C.12.f.

### Transportation

- During weekend operations, project employees shall park at the Community Activities Building parking lot.

Sources:
---. *Final Environmental Impact Report for the Veterans Memorial Senior Center/YMCA Project*. October 2019.