



SIERRA CLUB

LOMA PRIETA CHAPTER

SAN MATEO, SANTA CLARA & SAN BENITO COUNTIES

January 30, 2023

To: Lisa Costa Sanders
Principal Planner
City of San Carlos
600 Elm Street
San Carlos, CA 94070-3085
lcostasanders@cityofsancarlos.org

Thank you for the opportunity to comment on the 808 Alameda, San Carlos environmental impact report. Our comments are divided into four sections:

- Wetlands
- Logging and flooding
- Fire
- Emissions increase and VMT

Wetlands

On March 4th, First Solutions said wetlands existed at 808 Alameda, San Carlos. Per EPA [Final Rule: Revised Definition of “Waters of the United States” Fact Sheet December 2022](#) the Army Corp of Engineers needs to comment on such wetlands. The wetlands and related underground springs would naturally empty directly into Pulgas Creek less than a mile downhill, if it weren't highly engineered into storm drains. The drains currently carry the water from the site through a complex network of pipes feeding into Pulgas Creek under Old County Road about 1 mile away. First Solutions notes in their March 4th report that

a “stream, which includes creeks and rivers, is defined in the California Code of Regulations (CCR) as follows: “a body of water that flows at least periodically or intermittently through a bed or channel having banks and supports fish or other aquatic life. This includes watercourses having a surface or subsurface flow that supports or has supported riparian vegetation” (14 CCR 1.72).”

Public commenters have expressed concerns about protected species like the San Francisco garter snake and the California red-legged frog, as well as other wildlife, plants and wetlands on the site. We look forward to the Army Corp of Engineers' and the California Fish and Game Department's comments regarding life supported by wetlands and streams at 808 Alameda, San Carlos.

If Army Corp and Fish and Game have not commented then the comment period should be extended until they do.

Logging and flooding

Last year 808 Alameda, San Carlos, was subjected to severe, and possibly illegal, tree removal by the developer. [Tree removal increases the risk of erosion and mudslides when winter rains](#)

[begin](#), as San Carlos experienced this year at both this site and the school site below. The increased hardscape from this project creates downstream flooding dangers for the whole community. Conventional C3 stormwater mitigation has proven inadequate this year because of compounding accumulation from hardscape upstream. As a San Francisco Chronicle article warned five months before the prediction materialized, flood risks have increased due to [climate change and atmospheric rivers with this area mostly at risk](#). The EIR should address how to prevent potentially billions of dollars in damage downstream which is caused by project runoff.

Fire

According to CalFire, this project is in a high-risk fire zone. Tree removal can make native forests more flammable and lead to greater fire severity for decades, while ‘mechanical thinning’ can also increase fire risk. This project could increase danger of fire for the whole community on this hillside as [climate change increases the risk by 50%](#). The plan also intends to seal many of the natural streams with concrete blockage, further dehydrating the vegetation. The EIR should specify how the greatly decreased forestation will allow the vegetation to stay hydrated in order to reduce fire risk.

Emissions increase and VMT

Climate change is increasing because individual cities such as San Carlos have not taken feasible steps to reduce emissions locally. The IPCC has warned of the need to reduce GHG in order to [prevent severe climate disruptions that could exacerbate hunger, conflict and drought worldwide](#). Per the [IPCC 6 report titled Code Red for Humanity](#) the “internationally-agreed threshold of 1.5 degrees above pre-industrial levels of global heating was perilously close”.

808 Alameda, San Carlos, takes us closer to the precipice with the increase in Vehicle Miles Travelled. This contradicts the goals set by the [San Carlos Climate Action Plan](#) which identifies reductions that need to come from primarily the transportation and building sector. The EIR should explain how 808 Alameda, San Carlos, will meet the [The California Air Resources Board determination](#) that local governments must achieve Vehicle Miles Travelled reductions of 7 percent below projected VMT levels in 2030 (which includes currently adopted SB 375 SCSs). Note that this target has been doubled in the CARB 2022 scoping plan but that came out after this EIR was published.

A feasible project alternative would be to significantly reduce VMT impacts by re-envisioning the project as one centered entirely around pedestrian movement, including transit, bike, and micromobility. This would entail building more affordable units, for a target resident population owning fewer cars, and greatly reduced garage and parking capacity.

On page 101 CARB states:

It is recommended that local governments consider policies to reduce VMT to help achieve these reductions, including: land use and community design that reduces VMT; transit oriented development; street design policies that prioritize transit, biking, and walking; and increasing low carbon mobility choices, including improved access to viable and affordable public transportation and active transportation opportunities. It is important that VMT reducing strategies are implemented early because more time is necessary to achieve the full climate, health, social, equity, and economic benefits from these strategies.

On page 76 CARB states:

Promote all feasible policies to reduce VMT, including:

- *Land use and community design that reduce VMT,*
- *Transit oriented development,*
- *Complete street design policies that prioritize transit, biking, and walking, and, increasing low carbon mobility choices, including improved access to viable and affordable public transportation and active transportation opportunities.*

Instead, this EIR relies on Transportation Demand Management or TDM. TDM has not worked in [CA as emissions continue to increase from the transportation](#) sector. TDM needs to be monitored and enforced, with feedback to increase enforcement as targets fail. None of the three elements are present in the EIR: enforcement, monitoring, and feedback. The EIR should be returned as inadequate and, at a minimum, require explain how enforcement and monitoring for TDM can keep the transportation sectors emission below 1.5 degrees by 2030.

Thank you for your attention to our suggestions,



Gladwyn d'Souza, Conservation Committee Chair
Sierra Club Loma Prieta Chapter

cc Camille King camilleaking@gmail.com

Debbie Baldocchi gdb357@aol.com

Kristin Mercer tomercer@comcast.net

James Eggers, Chapter Director, james.eggers@sierraclub.org