



ENVIRONMENTAL CONSULTANTS  
Sound Science. Creative Solutions.®

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October 28, 2020

Camille Leung, Senior Planner  
County of San Mateo, Building and Planning Department  
455 County Center, Second Floor  
Redwood City, CA 94062

**Re: Change Order No. 2: Scope and Cost Estimate to Provide an Addendum to the Final Environmental Impact Report for the Highland Estates Subdivision Project**

Dear Ms. Leung:

In accordance with your request, SWCA Environmental Consultants (SWCA) is pleased to submit Change Order No. 2 to provide an Addendum to the Final Environmental Impact Report (Final EIR) for the Highland Estates Subdivision Project (project) in San Mateo County, California. SWCA understands that there have been changes to the project's construction program following implementation of Mitigation Measures GEO-1 [for all lots] and GEO-2b [for Lots 5–8]). In accordance with the recommendations of a qualified geotechnical engineer, the amount of soil that must be removed from the site in order to enable homes to be safely constructed on Lots 5–8 is greater than the amount of soil removal previously documented in the Final EIR. The specific differences between the assumptions made in the Final EIR analysis and the way in which the project is presently proposed to be completed consist of the following:

- The Final EIR assumed that all 11 lots approved by the subdivision would be built concurrently starting in June 2009 with completion in June 2010, whereas actual buildout of the project has occurred in phases, with Lots 1–4 being constructed in 2016–2017, Lots 9–11 being constructed in 2019–2021, and Lots 5–8 being constructed in 2021–2022. As a result, the assumption in the Final EIR that import/export volumes would be balanced is no longer applicable.
- The overall volume of imported fill, exported soil, and associated truck trips have increased as a result of detailed geotechnical investigations and the resulting need to remove unsuitable soils which cannot be re-used on site and the associated need to import suitable fill materials. The proposed completion of the project necessitates the removal of 7,790 cubic yards (cy) of soils from Lots 5–8, requiring 649 construction truck trips. While the work is required for the implementation of Mitigation Measures GEO-1 and GEO-2b, these specific activities were not documented by the Final EIR.
- The need for a greater amount of cut and fill on Lots 5–8 than was assumed in the Final EIR has extended the time during which construction activities will occur on Lots 5–8 (from approximately 4–5 weeks to approximately 10 weeks).

Based on SWCA's preliminary analysis of the changes in grading volumes and construction truck trips necessary for completion of the project, i.e. the safe construction of homes on Lots 5-8, an Addendum focusing on the construction-related air quality, noise, and transportation impacts is appropriate for the evaluation of potential effects associated with the modifications to the construction program. This approach is in accord with California Environmental Quality Act (CEQA) Guidelines Section 15164 and is based on the preliminary findings showing no or low potential for

substantial increases in the severity of the previously identified impacts for air quality, noise, transportation, and for other environmental resource areas.

To provide a sufficient level of analysis, SWCA proposes the following scope of work and cost estimate.

## **TASK 1: ADDENDUM TO THE FINAL ENVIRONMENTAL IMPACT REPORT**

During preparation of the *California Environmental Quality Act Analysis Recommendations for the Highland Estates Project Modifications Memorandum* (CEQA Memo; SWCA October 2020), SWCA conducted a thorough review of the December 2008 Draft EIR, the September 2009 Recirculated Draft EIR, and the December 2009 Final EIR certified by the County Board of Supervisors in April 2010. SWCA also reviewed information provided by the Applicant and County staff including e-mail communications, the geotechnical report prepared for Lots 5–8, and other relevant information related to changes to the original project (i.e., updated cut and fill volumes; construction schedule; and the number and type of personnel, vehicles, and equipment necessary to complete the project).

SWCA will utilize this information and the findings from the CEQA memo to prepare an Addendum to the Final EIR (State Clearinghouse No. 2007052068) to address the changes to the project necessary for its completion. SWCA will first prepare a template for the Addendum and submit it to the County via email for review and approval. The Addendum template will consist of the following sections:

- an Introduction that briefly describes the project’s environmental review process, the changes to the project, and the basis for an addendum
- a Project Description that describes the original project and its construction timeline and the changes necessary for its completion
- a “CEQA Environmental Review Process” section that details the project’s Final EIR process and the basis for the appropriateness of an addendum based on CEQA Guidelines Sections 15162 and 15164, i.e., why the project with the proposed changes would: (1) not result in any new significant environmental impacts, (2) not result in a substantial increase in the severity of previously identified environmental impacts, and (3) not require the adoption of any new or considerably different mitigation measures or alternatives
- a “Proposed Changes to Approved Project” section that describes the specific changes to the construction program necessary for completion of the project in compliance with the adopted geology mitigation measures and contrasts those with the approved project
- a “Potential Environmental Effects of the Proposed Changes” section that includes an analysis of the change in the magnitude and duration of construction activities necessary for completion of the project with analyses of environmental resources areas that would not be affected by project changes followed by detailed analyses for the environmental resources areas that could be affected by the proposed changes to the construction program - air quality, noise, and transportation - including a summary of the EIR’s transportation, noise and air quality impacts
- a Conclusion that will summarize the findings related to project changes needed for its completion and whether such changes would affect the analysis or conclusions in the Final EIR and if any additional environmental review is required beyond this EIR addendum.

Upon County approval of the Addendum format, SWCA will prepare an Addendum to the Final EIR that will summarize the Final EIR findings, describe the changes to the cut and fill volumes anticipated for Lots 5–8, and evaluate modifications to the construction program against the original findings in the Final EIR. Because changes necessary to complete the project do not alter the project’s land use program, the operational impacts of the original

project would be the same under the project as proposed for completion. Therefore, the Addendum will focus on the construction-related impacts for affected environmental resources areas.

An updated analysis will be provided for each environmental resource area discussed in the Final EIR. The Addendum will address environmental resources areas that would not be affected by project changes first, followed by analyses for the environmental resources areas that could be affected by the proposed changes to the construction program, specifically air quality, noise, and transportation. The updated analyses will be limited to a review of the changes to construction activities such as excavation depth and the magnitude and duration of construction-related activities on Lots 5–8 necessary for completion of the project, including the projected increase in construction truck trips compared to that of the original project.

In addition, to reflect changes to CEQA including Appendix G: Environmental Checklist Form since certification of the Final EIR in 2010, the Addendum will also include a discussion of the following new environmental resource areas added after 2010:

- tribal cultural resources
- energy resources
- wildfire

As discussed above, project changes will require a more detailed analysis for air quality due to the changes in grading volumes and construction truck trips. In April 2010 when the Final EIR was certified, the Bay Area Air Quality Air Quality Management District (BAAQMD) had published CEQA Air Quality Guidelines (1999); however, those guidelines did not recommend quantification of construction-related emissions of criteria pollutants. Since then, the BAAQMD has published updated CEQA Air Quality Guidelines in 2010, 2012, and 2017 with adopted thresholds of significance and recommended quantification of construction-related emissions of criteria pollutants. As a result, the significance of construction air quality impacts will be evaluated using the 2017 BAAQMD CEQA Air Quality Guidelines. SWCA will present the original URBEMIS2007 emissions calculations prepared for development of Lots 1-11 between June 2009 and June 2010 and presented in the 2008 Draft EIR. SWCA will use California Emissions Estimator Model (CalEEMod) version 2016.3.2<sup>1</sup> to recalculate project emissions for project construction as originally proposed using information from the URBEMIS2007 emissions calculations prepared for the 2008 Draft EIR but updated to include 167 construction truck trips for import of 2,000 cy of fill and a clearing and grubbing phase. The updated calculations as run through CalEEMod will also include a new run that will show emissions calculations with the implementation of the required construction air quality mitigation measure (EIR Mitigation Measure AQ-1). Emission estimates generated by CalEEMod will be compared against the BAAQMD's established thresholds of significance for criteria air pollutants.

To allow comparison of the original project and the proposed modifications necessary for project completion, the original base case information for Lots 1–11 will be evaluated and allocated as appropriate to develop base case CalEEMod inputs specific to Lots 5–8. To complete the base case analysis, SWCA will use the construction roster, schedule, and assumptions from the URBEMIS2007 analysis used to support the original EIR analysis to develop a

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<sup>1</sup> The California Emissions Estimator Model version 2016.3.2 is a statewide land use emissions computer model designed by the California Air Pollution Officers Association (CAPCOA) in collaboration with California air districts to provide a uniform platform for government agencies, land use planners, and environmental professionals to calculate potential criteria pollutant and greenhouse gas emissions associated with both construction and operation of land use projects. This program analyzes both construction (short-term) and operational (long-term) emissions by utilizing both default values for specific geographic areas and typical land use projects, as well as project-specific values such as construction schedules and equipment rosters. The model can be downloaded from: <http://caleemod.com/>.

specific base case analysis for Lots 5–8 in CalEEMod. The base case analysis for Lots 5–8 in CalEEMod will be similar to the base case for the entire project as originally proposed, except that:

- activities will be allocated to Lots 5–8 based on proposed acreage of Lots 5–8 compared with the other lots to estimate construction duration that would be implicitly assumed under the base case modeled in URBEMIS2007;
- for consistency, a clearing and grubbing phase will be included in the Lots 5–8 base case analysis since site preparation, clearing, grubbing, and tree removal can reasonably be assumed to occur both under the project as originally proposed as well as the project as currently proposed in the Schedule and Phasing information from March 2020, provided by BKF Engineers;
- the base case will include 167 haul truck round trips (334 one-way trips) during the grading phase, which is based on a fill volume of 2,000 cubic yards of materials as analyzed in the original EIR; and
- for consistency, the base case and currently proposed Lots 5–8 CalEEMod runs will be assumed to take place beginning in May of 2021 so that the nonroad and on-road equipment use the same EMFAC Emission factors.

Through the modifications to the base case as listed above, the effects of the original project can be reevaluated just for Lots 5–8 construction, as originally proposed. Then, the emissions from the project as currently proposed will be determined based on the proposed off-haul volumes of 7,790 cubic yards, 649 material export round trips, an increase in worker trips from what was likely originally assumed<sup>2</sup>, and an increase in grading phase length. The difference in emissions under these two scenarios will then be directly attributable to proposed changes to the Lots 5–8 construction activities. All CalEEMod calculations will be included as an appendix to the Addendum.

SWCA will submit the Draft Addendum template and data requests to the County within two weeks of an executed contract or notice to proceed. The County will be responsible for confirming with the Applicant that there are no changes to the project details, including but not limited to grading quantities, number of workers, and required equipment. SWCA will submit the Draft Addendum and Administrative Record to the County via email within 4 weeks of receiving final approval for the Addendum template and complete responses to data requests. SWCA will respond to one set of consolidated comments from the County and submit the revised Draft Addendum to the County within 2 weeks of receipt of comments. SWCA will respond to one final round of consolidated comments from the County and submit the Final Addendum and Administrative Record as both a Word document and a pdf to the County within 1 week of receipt of comments.

### **TASK 1 ASSUMPTIONS:**

- *In the event additional information is needed to complete the updated analysis, SWCA will submit up to two data requests to clarify information, request additional documentation related to the Final EIR analysis and project changes, or solicit other information, as needed. SWCA assumes the County will provide the requested information within 5 business days of the request.*
- *SWCA assumes that a health risk assessment for construction and operation will not be required due to the short duration of the Lots 5–8 construction and negligible long-term operational emissions.*

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<sup>2</sup> Note that there is no data provided in URBEMIS on worker commute trips, so it is assumed that a default value is used for this. Therefore, the base case scenario will use the CalEEMod default to estimate worker trips for construction of Lots 5–8 as originally proposed which is less than the actual proposed worker trips during the grading phase.

- *The analysis of cumulative impacts will be based on SWCA's review of Table 4.0-1, Reasonably Foreseeable Projects, of the 2009 Recirculated Draft EIR and consultation with the County, to ensure that all new projects now under construction or expected to be under construction in the reasonably foreseeable future are considered in the Addendum. Further, SWCA assumes all necessary technical analyses of impacts of each of the cumulative projects are available and that no new technical analyses will be needed for any of the cumulative projects in order to complete the cumulative impacts discussions for the Addendum.*
- *This scope and cost estimate includes up to two draft submittals and up to two rounds of consolidated comments from the County. After the County's review of the second submittal, SWCA will revise the Draft Addendum and submit the Final Addendum.*
- *All submittals to the County will be provided electronically. Hard copy submittals may be provided at an additional cost.*
- *SWCA assumes that upon receipt of an executed contract or written notice to proceed, the project description and/or SWCA's scope of work will not change from that agreed upon under Change Order No. 2. Unanticipated changes to the scope of work and/or additional requests from the County may be performed at an additional cost.*

## SCHEDULE

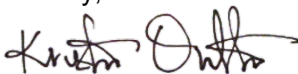
SWCA is ready to continue providing support upon receipt of an executed contract or written notice to proceed from the County. SWCA assumes that the tasks provided under this change order will start in October 2020 and be completed before the end of the calendar year.

## COST ESTIMATE

Based on thoughtful consideration of the project requirements and a thorough estimate of the attendant labor and direct costs, SWCA proposes an additional time-and-materials budget not to exceed **\$22,211** (Table 1). Tasks billed against this additional budget will be charged at the hourly rates in Exhibit B of the contract for the time spent, with dates, staff, and time to be outlined in the invoices.

SWCA prides itself on providing consulting services of the highest quality and efficiency, and we look forward to continuing our support on this project. Should you have any questions or desire additional information, please contact us at your convenience.

Sincerely,



Kristen Outten  
Senior Biologist/Project Manager

**Table 1: Total and Per Phase Estimated Project Cost**

Staff	Project Role	Rate	Hours	Charge
Kristen Outten	Project Manager	\$ 142.00	18.00	\$ 2,556
Barbara Sahn	CEQA Subject Matter Expert	\$ 240.00	8.00	\$ 1,920
Julie Barlow	Planning Team Lead	\$ 195.00	9.00	\$ 1,755
Peter Mye	Senior Planner	\$ 187.00	48.00	\$ 8,976
Michele Rowe	Air Quality Specialist	\$ 187.00	26.00	\$ 4,862
Liz Haines	Technical Editor	\$ 119.00	18.00	\$ 2,142
Labor Total			127.00	\$ 22,211
<b>Project Total</b>				<b>\$ 22,211</b>