

RESOLUTION NO. 2023 - 01

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF SAN BRUNO RECOMMENDING THAT THE CITY COUNCIL ADOPT A MITIGATED NEGATIVE DECLARATION AND MITIGATION MONITORING AND REPORTING PROGRAM FOR THE 2023 – 2031 HOUSING ELEMENT UPDATE

WHEREAS, State law requires each jurisdiction in California to adopt a General Plan, which includes a Housing Element; and

WHEREAS, the proposed 2023-2031 Housing Element will replace the existing 2015-2023 Housing Element and will serve as the City of San Bruno's guiding policy document for meeting the City's future housing needs at all economic levels; and

WHEREAS, jurisdictions within the San Francisco Bay Area region are required to prepare an update to their Housing Elements for the 2023-2031 planning period; and

WHEREAS, the City of San Bruno was allocated 3,165 housing units to plan for over the 2023-2031 planning period; and

WHEREAS, pursuant to Government Code Section 65583(a)(3), the Housing Element Update is a policy document which includes the preparation of an inventory of land suitable and available for residential development, including vacant sites and sites with a realistic and demonstrated potential for redevelopment during the planning period to meet the City's housing need at the designated income levels; and

WHEREAS, pursuant to the California Environmental Quality Act (CEQA) and Implementing Guidelines, an Initial Study and Draft Mitigated Negative Declaration (IS/MND), dated December 2022, was been prepared by David J. Powers & Associates, Inc. and, based on the type and intensity of land uses and programs identified with the 2023-2031 Housing Element update and the information contained therein, the Initial Study and Draft Mitigated Negative Declaration conclude that the Project, with the proposed mitigation measures, would not have a significant adverse effect on the environment; and

WHEREAS, the IS/MND identified that: the 2023-2031 Housing Element update will have no or less than significant impacts on Aesthetics, Agriculture and Forestry Resources, Energy, Geology and Soils, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Population and Housing, Public Services, Recreation, Utilities and Service Systems, and Wildfire; the Project's impacts on Air Quality, Biological Resources, Cultural Resources, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Noise, Transportation, and Tribal Cultural Resources are potentially significant but that all such impacts can be reduced to levels of insignificance by implementation of the mitigation measures identified in the MND; and

WHEREAS, the City, as the lead agency for the Project, posted a Notice of Intent on the City's website, filed the Notice of Intent with the County Clerk for posting, directly mailed the Notice of Intent to public agencies and through the State Clearing House (SCH # 2021030357) and requesting parties, and provided copies of the Initial Study/Mitigated Negative Declaration to the public for review and comment for a thirty (30) day period beginning December 9, 2022 and ending January 9, 2023; and

WHEREAS, in connection with the approval of a project involving the preparation of an initial study/mitigated negative declaration that identifies one or more potentially significant environmental effects, CEQA requires the decision-making body of the lead agency to incorporate feasible mitigation measures that would reduce those potentially significant environment effects to a less-than-significant level; and

WHEREAS, pursuant to CEQA Guideline §15074, whenever a lead agency approves a project requiring the implementation of measures to mitigate or avoid potentially significant effects on the environment. CEQA also requires a lead agency to adopt a mitigation monitoring and reporting program to ensure compliance with the mitigation measures during project implementation. A copy of the Mitigation Monitoring and Reporting Program ("MMRP") for the 2023-2031 Housing Element update, which defines the measures which would be imposed on the Project to mitigate or avoid potentially significant environmental impacts, is attached hereto as Exhibit "B" and incorporated herein by reference; and

WHEREAS, a copy of the Initial Study/Mitigated Negative Declaration is set forth in Exhibit "A" and incorporated herein by reference; and

WHEREAS, the Planning Commission serves as an advisory body to the City Council as to the Housing Element Update Project, and in that capacity has reviewed and considered the Mitigated Negative Declaration in draft form in accordance with State CEQA Guidelines Section 15025 (c); and,

WHEREAS, City's Department of Community & Economic Development, 567 El Camino Real, San Bruno, CA, 94066, is the custodian of the documents and other materials that constitute the record of proceedings related to the Project and the Initial Study/ Mitigated Negative Declaration; and,

WHEREAS, on January 12, 2023, the Planning Commission considered the Initial Study and Draft Mitigated Negative Declaration, public comments and responses, and the application of all mitigation measures and a proposed Mitigation Monitoring and Reporting Program (MMRP) for the Housing Element project.

NOW, THEREFORE, BE IT RESOLVED by the Planning Commission of the City of San Bruno as follows, based on facts in the staff reports, written and oral testimony, and exhibits presented:

1. That the Planning Commission has independently reviewed and analyzed the Initial Study/Mitigated Negative Declaration and other information in the record and has considered the information contained therein prior to acting upon or

recommending approval of the Project. Based on all evidence in the administrative record for the Project, the Commission hereby makes the following specific findings:

- a. The draft Initial Study/Mitigated Negative Declaration prepared for the Project has been completed in compliance with CEQA and the CEQA Guidelines.
- b. The draft Initial Study/Mitigated Negative Declaration prepared for the Project contains a complete and accurate reporting of the environmental impacts associated with the Project.
- c. The Commission has considered the draft Initial Study/Mitigated Negative Declaration.
- d. The draft Initial Study/Mitigated Negative Declaration represents the independent judgment and analysis of the city as lead agency for the Project.
- e. The Project will not result in a significant effect upon the environment because the mitigation measures described in the MMRP have been added to the Project as a condition of approval.
- f. Based on its review of the whole record before it, there is no substantial evidence in the record supporting a fair argument that the Project will have a significant effect on the environment.

2. Based upon the Draft Mitigated Negative Declaration and comments and testimony received, the Planning Commission hereby finds that there is no substantial evidence that the 2023-2031 Housing Element update, as mitigated, will have a significant effect on the environment.

3. The Planning Commission hereby recommends that the San Bruno City Council adopt the Draft Mitigated Negative Declaration attached hereto as Exhibit A and the Mitigation Monitoring Program attached hereto as Exhibit B.

4. The Secretary of the City of San Bruno Planning Commission is hereby directed to forward to the City Council a certified copy of this resolution together with an attested copy.

1/18/2023

Date

DocuSigned by:

Gerard Madden

Planning Commission Chair

ATTEST

DocuSigned by:

Michael Paughlin

Planning Commission Secretary

APPROVED AS TO FORM

DocuSigned by:

Trisha Ortiz

City Attorney

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I, Michael Laughlin, Planning Commission Secretary, do hereby certify that the foregoing Resolution was duly and regularly passed and adopted by the Planning Commission of the City of San Bruno this 12th day of January 2023 by the following vote:

AYES	Commissioners:	<u>Durazo, Biasotti, Harmon, Johnson, Kuhn, Lethin</u>
NOES	Commissioners:	<u>none</u>
ABSENT	Commissioners:	<u>none</u>
RECUSED	Commissioners	<u>Madden</u>

Exhibit A

**2023-2031 HOUSING ELEMENT UPDATE
FOR THE CITY OF SAN BRUNO**

**INITIAL STUDY
AND
DRAFT MITIGATED NEGATIVE DECLARATION**

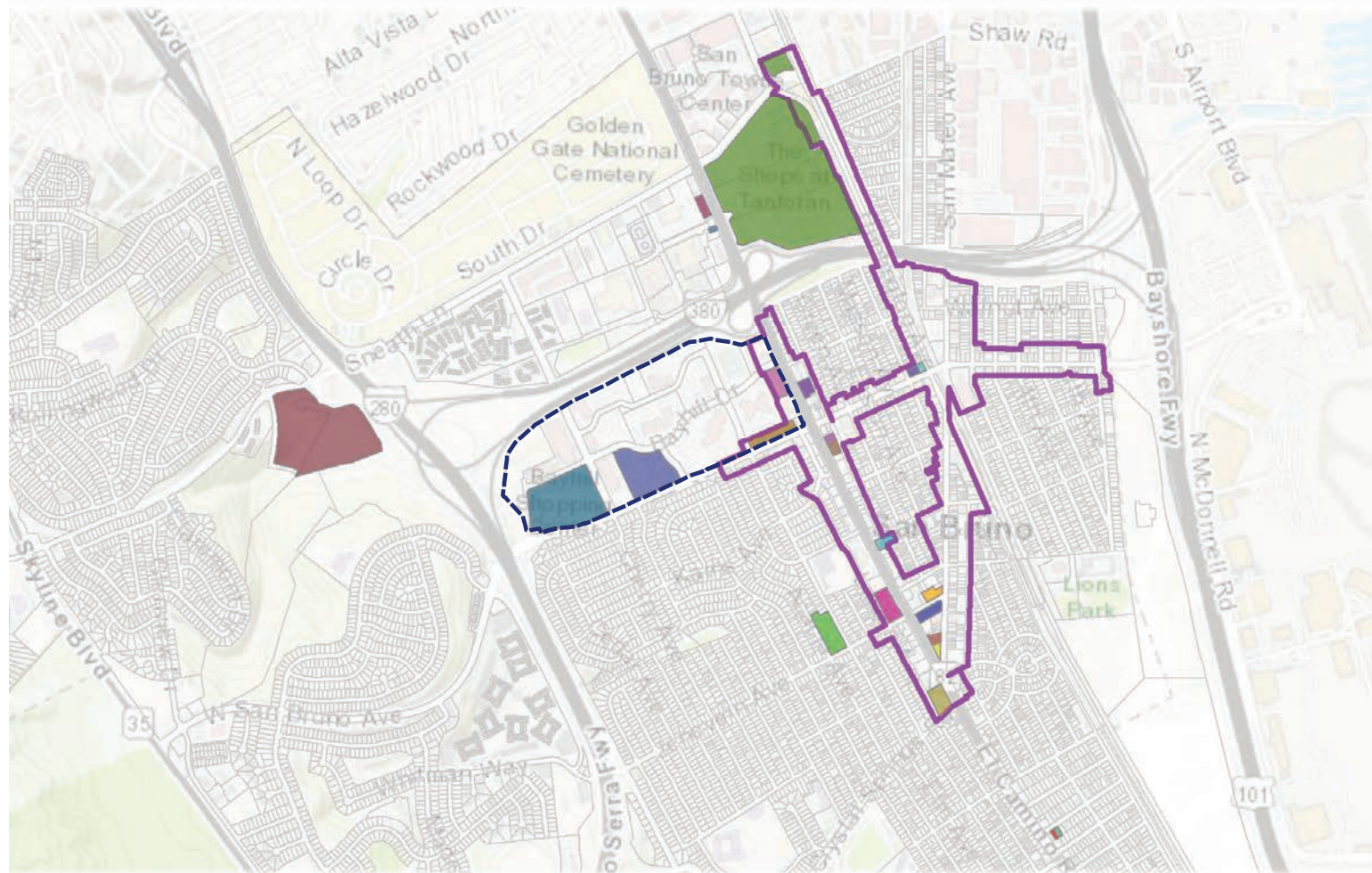
December 2022

Prepared by:

**David J. Powers & Associates, Inc.
1736 Franklin Street, Suite 300
Oakland, CA 94612**

Initial Study/Mitigated Negative Declaration

2023-2031 Housing Element Update



December 2022



CITY OF SAN BRUNO

Mitigated Negative Declaration

Pursuant to Section 21000 et seq of the Public Resources Code, a Mitigated Negative Declaration is hereby granted for the following project:

1. Project Title: 2023-2031 Housing Element Update
2. Lead Agency Name and Address: City of San Bruno
567 El Camino Real
San Bruno, CA 94066
3. Contact Person and Phone Number: Michael Smith
Senior Planner
msmith@sanbruno.ca.gov
650-616-7062
4. Project Location
The proposed project would occur entirely within the City of San Bruno, which is located in northern San Mateo County. The city limits encompass a 5.49 square-mile area that stretches 3.5 miles from the relatively flat eastern areas along Highway 101 to the hilly western neighborhoods located on the eastern facing slope of the Coast Ranges.
5. Project Sponsor's Name & Address: City of San Bruno
567 El Camino Real
San Bruno, CA 94066
6. Description of Project: The project proposes to update the Housing Element of the San Bruno General Plan 2025 in accordance with California Government Code Section 65583. The proposed 2023-2031 Housing Element will replace the existing 2015-2023 Housing Element and serve as the City of San Bruno's guiding policy document for meeting the City's future housing needs at all economic levels. As a policy document, the

Housing Element does not result in direct physical changes to the environment but would indirectly lead to physical environmental changes by enabling the development of approximately 3,618 additional housing units within the City's jurisdiction.

As required by Government Code Section 65583(a)(3), the Housing Element Update involves the preparation of an inventory of land suitable and available for residential development, including vacant sites and sites with a realistic and demonstrated potential for redevelopment during the planning period to meet the City's housing need at the designated income levels. In accordance with the sites inventory requirements under California Government Code sections 65583(c), the project will also include a program that identifies actions that the City is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the 2023-2031 Housing Element through the administration of land use and development controls (including General Plan Amendments and rezoning).

FINDING

The Community and Economic Development Director finds the project described above will not have a significant effect on the environment in that the attached Initial Study identifies one or more potentially significant effects on the environment for which the project sponsor, before public release of this draft Mitigated Negative Declaration (MND), has made or agrees to make project revisions that clearly mitigate the effects to a less than significant level.

MITIGATION MEASURES INCLUDED IN THE PROJECT TO REDUCE POTENTIALLY SIGNIFICANT EFFECTS TO A LESS THAN SIGNIFICANT LEVEL

- A. AESTHETICS** – The project will not have a significant impact on this resource; therefore, no mitigation is required.
- B. AGRICULTURE AND FOREST RESOURCES** – The project will not have a significant impact on this resource; therefore, no mitigation is required.

C. AIR QUALITY

MM AIR-3.1: Prior to approval, the 2023-2031 Housing Element shall include a policy requiring future development at all Housing Opportunity Sites to implement the following measures during demolition and construction:

- a. Use Tier 4 engines for all off-road equipment greater than 50 horsepower (hp) and operating for more than 20 total hours over the entire duration of construction activities.
- b. Use diesel trucks with 2010 or later compliant model year engines during construction.
- c. Use renewable diesel during construction.
- d. Use low-VOC coatings during construction.
- e. Implement BAAQMD best management practices and if necessary, enhanced measures recommended by BAAQMD.
- f. Use portable electrical equipment where commercially available and practicable to complete construction.

Construction contractors shall utilize electrical grid power instead of diesel generators when (1) grid power is available at the construction site; (2) when construction of temporary power lines are not necessary in order to provide power to portions of the site distant from existing utility lines; (3) when use of portable extension lines is practicable given construction safety and operational limitations; and (4) when use of electrical grid power does not compromise construction schedules.

MM AIR-3.2: Prior to approval, the 2023-2031 Housing Element shall include a policy requiring future development at all Housing Opportunity Sites to conduct a construction and operational health risk assessment (HRA) prior to the issuance of discretionary permits that would allow demolition or construction activities to take place (whichever occurs first). If the HRA demonstrates, to the satisfaction of the City, that the health risk exposures for adjacent receptors will be less than BAAQMD project-level thresholds, then additional mitigation would be unnecessary. However, if the HRA demonstrates that health risks would exceed BAAQMD project level thresholds, additional feasible on- and off-site mitigation shall be analyzed to further reduce risks to the greatest extent practicable.

D. BIOLOGICAL RESOURCES

MM BIO-1.1: Prior to approval, the 2023-2031 Housing Element shall include a policy requiring future development at Housing Opportunity Sites to comply with the following measures:

- a. Demolition and nesting substrate (e.g., trees, bushes, grasses, and other vegetation) removal activities shall be scheduled to avoid nesting season (February 1 to August 31). To the extent feasible, construction activities shall be scheduled to occur during the non-nesting season (September 1 through January 31).
- b. Prior to issuance of any discretionary permits that would allow construction activities during the nesting season, a qualified biologist shall complete pre-construction surveys for active nests within 14 days of work commencing. The survey area must include the proposed development area and all areas within 300 feet of the development area boundary (“zone of influence”). If active nest, roost, or burrow sites are identified within the zone of influence, a no-disturbance buffer shall be established for all active nest sites prior to commencement of any proposed construction-related activities to avoid disturbances to migratory bird nesting activities. A no-disturbance buffer constitutes a zone in which construction activities cannot occur. The sizes of the buffers shall be determined by a qualified biologist based on the species, activities proposed near the nest, and topographic and other visual barriers. Buffers shall remain in place until the young have departed the area or fledged and/or the nest is inactive, as determined by the qualified biologist.
- c. If work is necessary within a buffer zone of an active bird nest, work may occur under the supervision of a qualified avian biologist. The qualified avian biologist monitoring the construction work shall have the authority to stop work and adjust buffers if any disturbance to nesting activity is observed.

E. CULTURAL RESOURCES

MM CUL-1.1: Prior to approval, the 2023-2031 Housing Element shall include a policy requiring future development at Housing Opportunity Site 14 to comply with the following measures:

- a. Removal or alteration of the commemorative features of California Historic Landmark #934 shall be prohibited, and must be incorporated into any future development proposals for Site 14.
- b. As part of the future project-level CEQA analysis of any discretionary permit that would allow the demolition of the

existing buildings located at Site 14, a Historic Resource Evaluation (HRE) shall be prepared by a qualified architect or architectural historian approved by the City and meeting the Secretary of the Interior's Professional Qualifications Standards published in the Code of Federal Regulations (36 CFR part 61). The HRE shall evaluate whether any of the existing buildings meet the definition of a historic resource pursuant to CEQA Guidelines Section 15064.5. If the existing buildings do not meet the definition of a historic resource, demolition may proceed. If the HRE finds that any of the existing buildings at Site 14 meet the definition of a historic resource, demolition of buildings eligible for listing as a historic resource shall be prohibited.

- c. In the event that any buildings meeting the definition of a historic resource pursuant to CEQA Guidelines Section 15064.5 are identified, future development proposals for Site 14 shall be reviewed for compliance by a qualified architect or architectural historian approved by the City and meeting the Secretary of the Interior's Professional Qualifications Standards published in the Code of Federal Regulations (36 CFR part 61) with one or both of the following standards prior to issuance of any discretionary permits that would allow modifications to the existing buildings or new construction on Site 14:
 - Secretary of Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings; or
 - Secretary of Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), Weeks and Grimmer.

MM CUL-2.1:

Prior to approval, the 2023-2031 Housing Element shall include a policy requiring future development at Housing Opportunity Sites 6, 8, 10, 16, 18, and 19 to comply with the following measures:

- a. If evidence of an archaeological site or other suspected cultural resource as defined by CEQA Guideline Section 15064.5, including darkened soil representing past human activity ("midden"), that could conceal material remains (e.g., worked stone, worked bone, fired clay vessels, faunal bone, hearths, storage pits, or burials) is discovered during construction related earth-moving activities, all ground-disturbing activity within 100 feet of the resources shall be halted and the City Planning Manager shall be notified. The project sponsor shall hire a qualified archaeologist to conduct a field investigation. The City's Planning Manager shall consult with the archaeologist to assess the significance of the find. Impacts to any significant resources shall be mitigated to a less-than-

significant level through data recovery or other methods determined adequate by a qualified archaeologist and that are consistent with the Secretary of the Interior's Standards for Archaeological documentation. Any identified cultural resources shall be recorded on the appropriate DPR 523 (A-J) form and filed with the NWIC.

- b. Prior to the initiation of any site preparation and/or the start of construction, the project sponsor shall ensure that all construction workers receive training overseen by a qualified professional archaeologist who is experienced in teaching non-specialists, to ensure that contractors can recognize archaeological resources in the event that any are discovered during construction.

MM CUL-2.2:

Prior to approval, the 2023-2031 Housing Element shall be amended to include a policy requiring future development at Housing Opportunity Site 14 to comply with the following measures:

- a. As part of the future project-level CEQA analysis of any discretionary permits that would allow ground-disturbing activities (e.g., grading, trenching, excavation, etc.) in the archaeological sensitive areas shown on Figure 4.5 1, exploratory trenching shall be conducted by a qualified archaeologist trained in both local prehistoric and historical archaeology within the proposed area of effect to determine if prehistoric- or historic-era archaeological resources are present. Explorations shall consist of at least one mechanically dug trench with excavation depths commensurate with the depth of proposed ground-disturbing activities. If any archaeological resources are exposed, these should be briefly documented, tarped for protection, and left in place. The results of the exploratory trenching shall be submitted to the Director of Community and Economic Development or the Director's designee. If it is determined by the project archaeologist that the proposed activities could damage an archaeological resource or that indications of other suspected archaeological resources are present (i.e., darkened soil "midden" representing past human activity), an Archaeological Resources Treatment Plan shall be prepared as described in MM CUL-2.1b below.
- b. If recommended by the project archaeologist, an Archaeological Resources Treatment Plan shall be prepared by the project archaeologist that contains, at minimum:
 - Identification of the scope of work and range of subsurface effects (including location map and development plan), including requirements for preliminary field investigations.

- Description of the environmental setting (past and present) and the historic/prehistoric background of the parcel (potential range of what might be found).
- Monitoring schedules and individuals
- Development of research questions and goals to be addressed by the investigation (what is significant vs. what is redundant information).
- Detailed field strategy to record, recover, or avoid the finds and address research goals.
- Analytical methods. Report structure and outline of document contents.
- Disposition of the artifacts.
- Security approaches or protocols for finds.
- Appendices: all site records, correspondence, and consultation with Native Americans, etc.

Implementation of the treatment plan by the project archaeologist shall be required prior to the issuance of any permits related to ground-disturbing activities. The treatment plan shall utilize data recovery methods to reduce impacts on subsurface resources. The treatment plan shall be submitted to the Director of Community and Economic Development or the Director's designee, along with a summary of the outcomes of the treatment plan and all associated documentation and recordation.

MM CUL-2.3:

Prior to approval, the 2023-2031 Housing Element shall include a policy requiring future development at Housing Opportunity Site 14 to comply with the following measures:

- a. Prior to the issuance of any discretionary permits that would allow ground-disturbing activities (e.g., grading, trenching, excavation, etc.) within the non-sensitive areas mapped on Figure 4.5 1, the project applicant shall hire a qualified archaeologist to develop a Worker's Environmental Awareness Program (WEAP) to train the construction crew on the legal requirements for the treatment of cultural resources as well as procedures to follow in the event of a cultural resources discovery. This training program shall be given to the crew before ground disturbing work commences and shall include handouts to be given to new workers.
- b. The applicant shall note on all construction plans that require ground disturbing activities that there is a potential for exposing buried cultural resources including prehistoric Native American burials.
- c. In the event that potentially significant archaeological resources are encountered during ground-disturbing activities occurring

at Site 14, all activity within a 50-foot radius of the find shall be stopped, the Director of Community and Economic Development or the Director's designee shall be notified, and the project archaeologist shall examine the find. The project archaeologist shall (1) evaluate the find(s) to determine if they meet the definition of an archaeological resource; and (2) make appropriate recommendations regarding the disposition of such finds prior to issuance of building permits. Recommendations could include collection, recordation, and analysis of any significant cultural materials. A report of findings documenting any data recovery shall be submitted to the Director of Community and Economic Development or the Director's designee and the Northwest Information Center (if applicable).

MM CUL-3.1: Prior to approval, the 2023-2031 Housing Element shall include a policy requiring future development at Housing Opportunity Sites 1, 2, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 20, 22 and 23 to comply with the following measures:

- a. If human remains are discovered at any project construction site during any phase of construction, all ground-disturbing activity within 100 feet of the resources shall be halted and the City's Planning Manager and the San Mateo County Coroner shall be notified immediately, according to Section 5097.98 of the State Public Resources Code and Section 7050.5 of California's Health and Safety Code. If the remains are determined by the County coroner to be Native American, the Native American Heritage Commission (NAHC) shall be notified within 24 hours, and the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains. The project sponsor shall also retain a professional archaeologist with Native American burial experience to conduct a field investigation of the specific site and consult with the Most Likely Descendant, if any, identified by the NAHC. As necessary, the archaeologist may provide professional assistance to the Most Likely Descendant, including the excavation and removal of the human remains. The City of San Bruno shall be responsible for approval of recommended mitigation as it deems appropriate, taking account of the provisions of State law, as set forth in CEQA Guidelines section 15064.5(e) and Public Resources Code section 5097.98. The project sponsor shall implement approved mitigation, to be verified by the City of San Bruno, before the resumption of ground-disturbing activities within 100 feet of where the remains were discovered.

F. ENERGY – The project will not have a significant impact on this resource; therefore, no mitigation is required.

- G. GEOLOGY AND SOILS** – The project will not have a significant impact on this resource; therefore, no mitigation is required.

H. GREENHOUSE GAS EMISSIONS

MM GHG-1.1: Prior to approval, the 2023-2031 Housing Element shall include a policy requiring applicants and their contractors to implement the following measures prior to and during construction:

- a. Prior to issuance of any discretionary permits that would allow demolition or construction (grading, excavation, building, etc.) activities at the Housing Opportunity Sites, the applicant shall submit a construction management plan that demonstrates that:
 - Alternative fueled (e.g. biodiesel, electric) construction vehicles/equipment shall make up at least 15 percent of the fleet;
 - Buildings shall be constructed with local building materials of at least 10 percent (sourced from within 100 miles of the City limits); and
 - Contractors shall recycle and reuse at least 50 percent of construction waste or demolition materials.

MM GHG-1.2: Prior to approval, the 2023-2031 Housing Element shall include a policy requiring future development at all Housing Opportunity Sites to demonstrate adherence with the following design measures prior to issuance of any discretionary permits that would allow construction of residential units:

- a. Construction of natural gas infrastructure and the use of natural gas appliances shall be prohibited;
- b. Future developments shall include all electric appliances;
- c. At a minimum, future development shall comply with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2 requirements.

I. HAZARDS AND HAZARDOUS MATERIALS

MM HAZ-2.1: Prior to approval, the 2023-2031 Housing Element shall include a policy requiring future development at Housing Opportunity Sites 6, 8, 10, 16, 18, and 19 to comply with the following measure:

- a. The City shall require a Phase I Environmental Site Assessment (Phase I ESA) prior to issuance of any discretionary permits that would allow ground-disturbing activities, with a Phase II ESA also required if the Phase I ESA indicates evidence of potential site contamination. The

City shall also require compliance with the site assessment(s) and any remediation, removal, and disposal requirements for soil, surface water, and/or groundwater contamination enforced by the Department of Toxic Substances Control (DTSC), Regional Water Quality Control Board (RWQCB), San Mateo County Department of Environmental Health (SMCEHS), California Division of Occupational Safety and Health (CalOSHA), U.S. Environmental Protection Agency (EPA), and other jurisdictional agencies.

MM HAZ-2.2:

Prior to approval, the 2023-2031 Housing Element shall include a policy requiring future development at Housing Opportunity Site 14 to comply with the following measures:

- a. Prior to the issuance of any discretionary permits that would allow ground-disturbing activities on Site 14 (outside of the area shown on Figure 4.9 1), the project proponent shall obtain a Phase I Environmental Site Assessment (ESA). The Phase I ESA shall be conducted in accordance with the United States Environmental Protection Agency's All Appropriate Inquiries (AAI) Rule and the latest American Society for Testing and Materials (ASTM International) guidelines, and identify all potential subsurface contaminants warranting further investigation.
- b. If the Phase I ESA identifies any potential contaminants warranting further investigation, a Phase II ESA shall be prepared in accordance with the United States Environmental Protection Agency's AAI Rule and the latest ASTM International guidelines. As part of the Phase II, a qualified environmental professional (as defined in Title 40 of the California Code of Regulations) shall take soil, soil vapor, and groundwater samples as determined necessary by the environmental professional in the area of proposed disturbance at 0.5 feet below ground surface (bgs) to the maximum proposed depth of disturbance. Collected soil samples shall be tested for all potential contaminants identified in the Phase I ESA to determine if contaminants exceed California Division of Occupational Safety and Health (Cal/OSHA) exposure limits or San Mateo County Environmental Health Services (SMCEHS) environmental screening levels for residential uses.
- c. The results of the Phase II ESA shall be provided SMCEHS department. If determined necessary by the SMCEHS, a Redevelopment Management Plan (RMP) or equivalent shall be prepared and submitted to the SMCEHS and the Director of Community and Economic Development or the Director's designee that includes 1) an evaluation of whether redevelopment activities will create new exposure pathways

to human health and the environment that pose unacceptable risks, and, if so, how those risks will be mitigated, and 2) a discussion of how contaminated media will be handled and disposed during construction activities. Once approved by the SMCEHS and Community and Economic Development Department, the RMP or equivalent shall be implemented by a qualified environmental professional. The results of the RMP or equivalent shall be submitted to the SMCEHS and the Director of Community and Economic Development or the Director's designee prior to the issuance of any issuance of any discretionary permits (e.g., grading, construction, occupancy, whichever occurs first).

MM HAZ-5.1: Prior to approval, the 2023-2031 Housing Element shall include a policy requiring future development at Housing Opportunity Site 14 to comply with the following measures:

- a. Prior to the issuance of any construction or building permits, the applicant shall submit a plan with a list of equipment to be used during construction that includes their height and proposed area of operation to the Director of Community and Economic Development or the Director's designee. The use of equipment in locations where it would penetrate critical aeronautical surfaces shall be expressly prohibited by any construction or building permits issued. The plan sets shall include a page depicting the critical aeronautical surfaces on-site, a list of all equipment with heights of 55 feet or greater and their respective heights, and informs construction workers that the use of equipment with heights that would penetrate critical aeronautical surfaces is prohibited.
- b. Future development at Housing Opportunity Site 14 shall comply with Policy AP-3 of the Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport (ALUCP). Buildings with heights in excess of the applicable critical aeronautical surface as shown in Exhibit IV-17 at Housing Opportunity Site 14 shall be prohibited unless the Federal Aviation Administration determines the proposed building height is not a hazard to air navigation in an aeronautical study prepared pursuant to the filing of Form 7460-1. Proof of compliance with Policy AP-3 of the ALUCP shall be provided to the Director of Community and Economic Development or the Director's designee prior to issuance of any construction or building permits.

J. HYDROLOGY AND WATER QUALITY – The project will not have a significant impact on this resource; therefore, no mitigation is required.

K. LAND USE AND PLANNING – The project will not have a significant impact on this resource; therefore, no mitigation is required.

L. MINERAL RESOURCES – The project will not have a significant impact on this resource; therefore, no mitigation is required.

M. NOISE

MM NOI-2.1: Prior to approval, the 2023-2031 Housing Element shall include a policy requiring future development at all Housing Opportunity Sites to implement the following measures during demolition and construction:

- Groundborne vibration studies shall be prepared by qualified professionals in accordance with industry-accepted methodology where heavy construction activities involving significant site grading, underground, or foundation work will occur within 25 feet of residential or other vibration sensitive uses. The industry-accepted methodologies include the recommended vibration assessment procedure and thresholds provided by public agencies such as Caltrans or the Federal Highway Administration. The studies should identify necessary construction vibration controls to reduce both human annoyance and the possibility of cosmetic damage. Controls shall include, but not be limited to, the following measures:
 - A list of all heavy construction equipment to be used for this project known to produce high vibration levels (tracked vehicles, vibratory compaction, jackhammers, hoe rams, etc.) shall be submitted to the City by the contractor. This list shall be used to identify equipment and activities that would potentially generate substantial vibration and to define the level of effort for reducing vibration levels below the thresholds.
 - Place operating equipment on the construction site as far as possible from vibration-sensitive receptors.
 - Use smaller equipment to minimize vibration levels below the limits.
 - Avoid using vibratory rollers and tampers near sensitive areas.
 - Select demolition methods not involving impact tools.
 - Modify/design or identify alternative construction methods to reduce vibration levels below the limits.
 - Avoid dropping heavy objects or materials.

N. POPULATION AND HOUSING – The project will not have a significant impact on this resource; therefore, no mitigation is required.

- O. PUBLIC SERVICES** – The project will not have a significant impact on this resource; therefore, no mitigation is required.
- P. RECREATION** – The project will not have a significant impact on this resource; therefore, no mitigation is required.

Q. TRANSPORTATION/TRAFFIC

MM TRN-1.1: Prior to approval, the 2023-2031 Housing Element shall include a policy requiring future development at all Housing Opportunity Sites that would generate a sufficient amount of trips according to the City's traffic analysis guidelines or otherwise warrant analysis as determined by the City to prepare a Transportation Analysis (TA) prior to the issuance of any discretionary permits. Prior to the preparation of the TA, a scope of work outlining the proposed approach to the TA shall be submitted to the Director of Public Works or the director's designee for review and approval. The TA, at a minimum, shall evaluate the proposed development for consistency with the City's General Plan and Walk 'N Bike Plan, review the proposed layout for any geometric design features that may increase hazards (e.g., sight distances, turning radii, etc.), and verify adequate emergency access is provided. The TA shall provide recommendations addressing any identified inconsistencies, geometric design hazards, or emergency access issues that shall be incorporated into the final design. The TA shall be prepared in accordance with Public Works' guidance and submitted prior to the approval of any discretionary permits as part of the project-level review of all future development under the Housing Element Update.

- R. TRIBAL CULTURAL RESOURCES** – Potential impacts to tribal cultural resources would be addressed through mitigation measures MM CUL-2.1, MM CUL-2.2, and MM CUL-2.3, identified above under E. Cultural Resources.
- S. UTILITIES AND SERVICE SYSTEMS** – The project will not have a significant impact on this resource; therefore, no mitigation is required.
- T. WILDFIRE** – The project will not have a significant impact on this resource; therefore, no mitigation is required.
- U. MANDATORY FINDINGS OF SIGNIFICANCE** – With the implementation of the mitigation measures identified above, the project would not degrade the quality of the environment, substantially affect the biological resources, or eliminate important examples of California history or prehistory. The mitigation measures would also ensure that the project's contribution to cumulative impacts would not be cumulatively considerable, and the project would not cause substantial adverse effects on human beings, either directly or indirectly.

PUBLIC REVIEW PERIOD

Before 5:00 p.m. on Monday, January 9th, any person may:

1. Review the Draft MND as an informational document only; or
2. Submit written comments regarding the information and analysis in the Draft MND. Before the MND is adopted, Planning staff will prepare written responses to any comments, and revise the Draft MND, if necessary, to reflect any concerns raised during the public review period. All written comments will be included as part of the Final MND.

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Appendix A: Air Quality and Greenhouse Gas Assessment

Appendix B: Noise & Vibration Assessment

Appendix C: VMT Analysis

Appendix D: Water Supply Assessment

SECTION 1.0 INTRODUCTION AND PURPOSE

1.1 PURPOSE OF THE INITIAL STUDY

The City of San Bruno, as the Lead Agency, has prepared this Initial Study for the proposed 2023-2031 Housing Element Update (“Housing Element Update” or “project”) in compliance with the California Environmental Quality Act (CEQA), the CEQA Guidelines (California Code of Regulations §15000 et. seq.) and the regulations and policies of the City of San Bruno, California.

The project proposes to update the Housing Element of the San Bruno General Plan 2025 in accordance with California Government Code Section 65583. This Initial Study evaluates the environmental impacts that might reasonably be anticipated to result from implementation of the proposed project at a program level. If a subsequent activity would have effects that are not within the scope of this Initial Study, then the City must prepare a new Initial Study leading to a Negative Declaration, a Mitigated Negative Declaration, or an Environmental Impact Report (EIR). Therefore, future development allowed under the Housing Element Update would necessitate subsequent project-level review.

The proposed 2023-2031 Housing Element will replace the existing 2015-2023 Housing Element and serve as the City of San Bruno’s guiding policy document for meeting the City’s future housing needs at all economic levels. As a policy document, the Housing Element does not result in direct physical changes to the environment but would indirectly lead to physical environmental changes by enabling the development of approximately 3,618 additional housing units within the City’s jurisdiction. All future housing development in the City must comply with the General Plan, zoning ordinance, state and federal permits, and local development standards. In addition, future discretionary actions (i.e., use permits, site plan review) require independent and project-specific environmental review to comply with CEQA.

1.2 PUBLIC REVIEW PERIOD

Publication of this Initial Study marks the beginning of a 30-day public review and comment period. During this period, the Initial Study will be available to local, state, and federal agencies and to interested organizations and individuals for review. Written comments concerning the environmental review contained in this Initial Study during the 30-day public review period should be sent to:

Michael Smith, Senior Planner
City of San Bruno
567 El Camino Real
San Bruno, CA 94066
msmith@sanbruno.ca.gov

1.3 CONSIDERATION OF THE INITIAL STUDY AND PROJECT

Following the conclusion of the public review period, the City of San Bruno will consider the adoption of the Initial Study/Mitigated Negative Declaration (MND) for the project at a regularly scheduled meeting. The City shall consider the Initial Study/MND together with any comments

received during the public review process. Upon adoption of the MND, the City may proceed with project approval actions.

1.4 NOTICE OF DETERMINATION

If the project is approved, the City of San Bruno will file a Notice of Determination (NOD), which will be available for public inspection and posted within 24 hours of receipt at the County Clerk's Office for 30 days. The filing of the NOD starts a 30-day statute of limitations on court challenges to the approval under CEQA (CEQA Guidelines Section 15075(g)).

SECTION 2.0 PROJECT INFORMATION

2.1 PROJECT TITLE

2023-2031 Housing Element Update

2.2 LEAD AGENCY CONTACT

Michael Smith, Senior Planner
City of San Bruno
567 El Camino Real
San Bruno, CA 94066
msmith@sanbruno.ca.gov

2.3 PROJECT SPONSOR

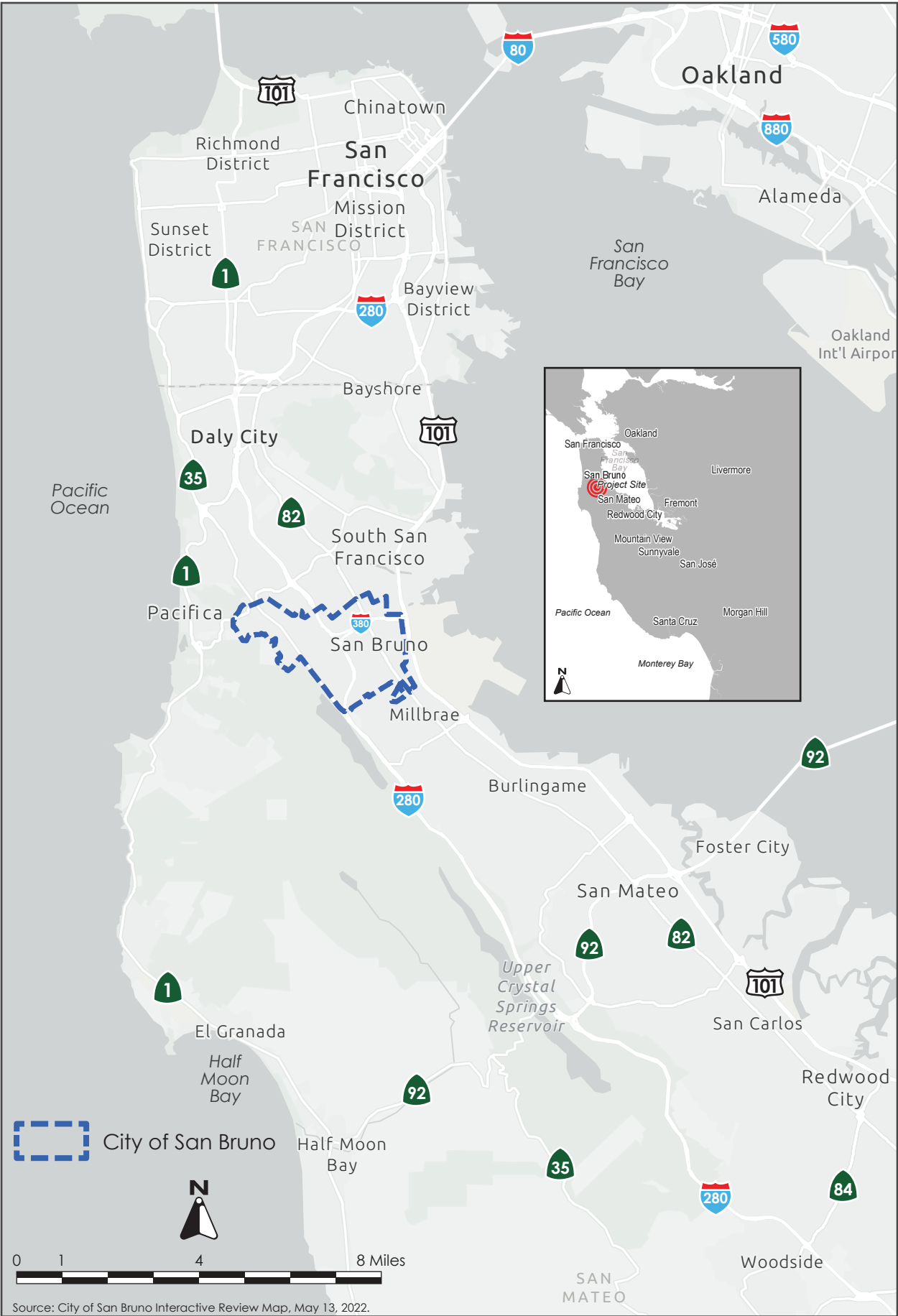
City of San Bruno
Community and Economic Development Department
567 El Camino Real
San Bruno, CA 94066

2.4 PROJECT LOCATION

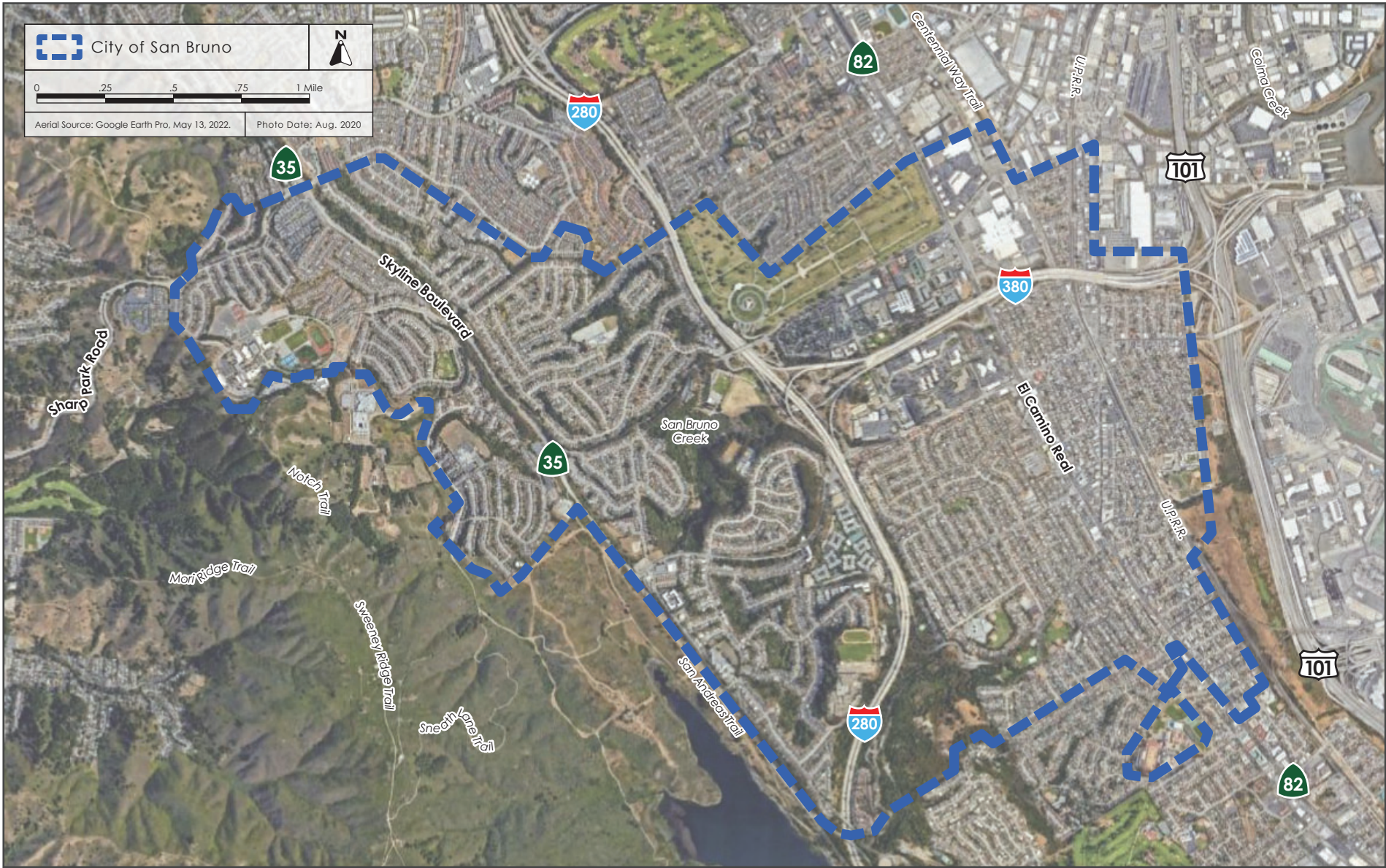
The proposed project would occur entirely within the City of San Bruno, which is located in northern San Mateo County. The city limits encompass a 5.49 square-mile area that stretches 3.5 miles from the relatively flat eastern areas along Highway 101 to the hilly western neighborhoods located on the eastern facing slope of the Coast Ranges. The eastern portion of the city is more urbanized and has a greater mix of land uses, while the western portion is primarily occupied by low-density residential development and open space.

The City is bordered by the City of South San Francisco to the north, the City of Millbrae to the south, and the City of Pacifica to the west. Additionally, there are unincorporated lands west and east of the city limits that are controlled by the California Department of Fish and Wildlife (CDFW) and the City and County of San Francisco, respectively.

Regional and aerial maps of the City are shown on Figure 2.4-1 and Figure 2.4-2, respectively.



REGIONAL MAP OF SAN BRUNO AND SURROUNDING AREA	FIGURE 2.4-1
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AERIAL PHOTOGRAPH OF THE CITY OF SAN BRUNO

FIGURE 2.4-2

2.5 PROJECT-RELATED APPROVALS, AGREEMENTS, AND PERMITS

2.5.1 City of San Bruno

The project would require the following discretionary approvals from the City of San Bruno:

- Adoption of the 2023-2031 Housing Element Initial Study and Mitigated Negative Declaration (MND)
- Adoption of the 2023-2031 Housing Element
- Adoption of amendments to the General Plan
- Future legislative actions to implement programs, including rezoning program
- Airport Land Use Control Plan (ALUCP) Override

2.5.2 California Department of Housing and Community Development

In addition to the discretionary approvals identified above, the 2023-2031 Housing Element will be reviewed by the California Department of Housing and Community Development.

2.5.3 City/County Association of Governments of San Mateo County

The Board of Directors of the City/County Association of Governments of San Mateo County (C/CAG) serves as the Airport Land Use Commission for airports within San Mateo County, including San Francisco International (SFO). As discussed in Section 4.9.1.2 and Section 4.13.1.2, Housing Opportunity Sites 14 and 19 are located within the 70-75 dB CNEL (Community Noise Equivalent Level) noise contour, and as shown in Table 3.2-1 are not zoned for residential use.¹ Residential land uses are considered incompatible with 70-75 dB CNEL noise contour by the Comprehensive Airport Land Use Compatibility Plan for the Environs of the San Francisco International Airport (ALUCP) if they were not zoned for residential use when the current ALUCP went into effect (November 8, 2012). As such, the C/CAG Board on November 10, 2022 adopted a resolution declaring that the Housing Element Update is inconsistent with the ALUCP with regard to planned housing on Sites 14 and 19. The San Bruno City Council under the ALUCP can override the C/CAG determination of inconsistency; the local agency override process involves three mandatory steps:

1. Holding a public hearing by the local agency on the proposed override action;
2. Making of specific findings by the governing body of the local agency that the proposed local action is consistent with the purposes of the airport land use commission statutes;
3. Approval of the override action by a two-thirds vote of the local agency's governing body; the override action must include adoption of the specific findings identified in Step 2, above.

There are two key outcomes of a local agency override of a C/CAG Board determination a proposed land use action as inconsistent with the ALUCP:

¹ dBA stands for A-weighted sound level; this scale of noise measurement gives greater weight to the frequencies of sound to which the human ear is most sensitive. CNEL is a measure of the cumulative noise exposure in a community, with a 5 dB penalty added to evening (7:00 pm - 10:00 pm) and a 10 dB addition to nocturnal (10:00 pm - 7:00 am) noise levels.

- The proposed land use action may proceed, subject to local agency review and permitting processes, as if it had been found consistent with this ALUCP by the C/CAG Board.
- If a city or county overrides a decision of the Airport Land Use Commission C/CAG Board relating to a publicly owned airport that is not operated by that city or county, the agency operating the airport “shall be immune from liability for damages to property or personal injury caused by or resulting directly or indirectly from the public agency’s decision to override the commission’s action or recommendation” (see Pub. Util. Code, Section 21678).

SECTION 3.0 PROJECT DESCRIPTION

3.1 BACKGROUND

3.1.1 San Bruno General Plan 2025

Since 1969, the State of California has required all California cities and counties to have a General Plan (California Government Code Section 65300). The General Plan is a state-required legal document that each planning agency in California prepares and the legislative body of each county and city adopts to provide a comprehensive, long-term plan for the physical development of the county or city. A General Plan must include the following seven mandatory elements specified in Government Code Section 65302: a) land use, b) circulation, c) housing, d) conservation, e) open space, f) noise, and g) safety. The General Plan is the City's official policy for its future character, form, and quality of development. The General Plan describes the amount, type and phasing of development needed to achieve the City's social, economic, and environmental goals. It is the policy framework for decision making on both private development projects and City capital expenditures. The current General Plan ("General Plan 2025") and associated EIR were adopted by the City Council in 2009. The Housing Element includes 23 Housing Opportunity Sites, some of which are already designated for housing as part of the current General Plan. Housing Opportunity Sites 6, 8, 10, 16, and 18 would conform with the City's General Plan and Municipal Code; Site 19 would comply with the City's General Plan but require a conforming rezoning to the Transit Oriented District (TOD) zoning district.

Since the adoption of the General Plan 2025, the City has adopted two long-range planning documents, including the Transit Corridors Plan (adopted in February 2013) and the Bayhill Specific Plan (adopted in October 2021). These plans in relationship to the Housing Opportunity Sites identified in the Housing Element Update (refer to Figure 3.2-1 and Section 3.2.1) are discussed below.

3.1.1.1 *Transit Corridors Plan*

The Transit Corridors Plan (TCP) outlines detailed policies, design guidelines and development standards to steer future public and private realm improvements in the TCP area. The boundaries of the TCP area in relationship to the Housing Opportunity Sites identified by the Housing Element Update are shown on Figure 3.2-1.

As shown on Figure 3.2-1, Housing Opportunity Sites 1, 2, 4, 5, 7, 9, 11, 12, 15, 17, 20, 21, 22, and 23 are located within the TCP area. The environmental effects of buildout of the TCP, including residential development at the Housing Opportunity Sites located within the TCP area at the densities assumed by the Housing Element Update, were analyzed in 2013 at a programmatic level in the San Bruno Transit Corridors Plan Environmental Impact Report ("TCP EIR"). The TCP EIR concluded that implementation of the TCP would result in significant and unavoidable impacts as regards historic resources, noise, and on intersection level of service (LOS). All other impacts were determined to be less than significant with mitigation incorporated. With the advent of 2018 amendments to CEQA resulting from Senate Bill 743 (SB 743), impacts to intersection LOS are no longer considered impacts under CEQA.

3.1.1.2 *Bayhill Specific Plan*

The Bayhill Specific Plan establishes a new policy and regulatory framework for guiding private and public development within an approximately 92.2-acre area bounded by Interstate 280 to the west, Interstate 380 to the north, properties fronting El Camino Real to the east, and San Bruno Avenue West to the south. The boundaries of the Bayhill Specific Plan area in relationship to the Housing Opportunity Sites identified by the Housing Element Update are shown on Figure 3.2-1.

As shown on Figure 3.2-1, Housing Opportunity Sites 3 and 13 are located within the Bayhill Specific Plan area. The environmental effects of buildout of the Bayhill Specific Plan, including residential development at the Housing Opportunity Sites located within the Bayhill Specific Plan area at the densities assumed by the Housing Element Update, were analyzed in 2021 at a programmatic level in the Environmental Impact Report for the Bayhill Specific Plan Including the Phase I Development (“Bayhill Specific Plan EIR”). The Bayhill Specific Plan EIR concluded that implementation of the Bayhill Specific Plan would result in significant and unavoidable air quality and vehicle miles traveled impacts. All other impacts were determined to be less than significant with mitigation incorporated.

3.1.2 Housing Element

As noted above, the Housing Element is one of seven state-mandated General Plan elements. The required contents of a housing element are set forth in California Government Code Section 65583. Among other requirements, housing elements are required to adequately plan to meet their existing and projected housing needs, including their share of the “regional housing need”. The law recognizes that in order for the private sector to adequately address housing needs and demand, local governments must adopt land use plans and regulatory schemes that provide opportunities for, and do not unduly constrain, housing development. Specifically, Section 65583 states that the Housing Element shall consist of “...an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources and scheduled programs for the preservation, improvement, and development of housing.” The Housing Element must also contain a schedule of actions that the local government is undertaking to implement the goals and objectives (i.e., the city’s required contribution to the provision of housing for the region). State law requires that the Housing Element be updated periodically, usually every eight years. It is subject to detailed statutory requirements and mandatory review by the California Department of Housing and Community Development (HCD).

The City’s current housing element (San Bruno Housing Element 2015-2023) was adopted by the City Council in April 2015 and certified by HCD. The adopted housing element covers the period between January 31, 2015 and January 1, 2023. State law requires all nine Bay Area counties and the local jurisdictions therein to update their respective housing elements to account for their regional housing needs allocation (discussed below in Section 3.1.3) and submit them to HCD by January 31, 2023. The City of San Bruno’s proposed housing element update is discussed in detail below in Section 3.2 .

3.1.3 Regional Housing Needs Allocation

Under state law, the HCD is required to allocate a region's share of the projected statewide housing need to its council of governments, based on California Department of Finance population projections and regional population forecasts. The Association of Bay Area Governments (ABAG) is the regional authority charged with preparing the regional housing needs allocation (RHNA), which quantifies the housing need for local jurisdictions in the San Francisco Bay Area. Once the region's fair share of regional housing need is determined, the housing need is allocated amongst all of the jurisdictions (cities/counties) within that region, and the city's fair share of regional housing need is calculated for each established planning horizon.

The City of San Bruno's fair share of the regional housing need for 2023 to 2031 was calculated as 3,165 housing units. Additionally, the No Net Loss Law (California Government Code Section 65863) requires that enough sites are available at all times throughout the RHNA planning period to meet a jurisdiction's remaining unmet housing needs for each income category. To ensure that sufficient capacity exists in the housing element to accommodate the RHNA throughout the planning period, HCD recommends jurisdictions create a buffer in the housing element inventory of at least 15 percent (equivalent to an additional 475 units allocated to the City of San Bruno for the 2023-2031 period). Table 3.1-1 below presents the City's RHNA and 15 percent buffer broken down by household income category.

Table 3.1-1: City of San Bruno RHNA by Household Income Category			
Household Income Category¹	RHNA	15 Percent Buffer	Combined Housing Targets²
Very Low (<50% AMI)	704	106	810
Low (50-80% AMI)	405	61	466
Moderate (80-120% AMI)	573	86	659
Above Moderate (>120% AMI)	1,483	222	1,705
Total Housing Units	3,165	475	3,640
Source: Association of Bay Area Governments. <i>Final Regional Housing Needs Allocation (RHNA) Plan: San Francisco Bay Area, 2023-2031</i> . December 2021.			
Notes:			
¹ The AMI (area median income) in San Mateo County as of 2022 was \$166,000. Source: U.S. Department of Housing & Urban Development Office of Policy Development & Research . "FY 2022 Income Limits Documentation System". Accessed October 25, 2022. https://www.huduser.gov/portal/datasets/il/il2022/2022summary.odn			
² Combined targets calculated by adding the City's RHNA with the proposed 15 percent buffer.			

3.1.4 Existing Conditions

In the current RHNA cycle, which spans January 31, 2015 to January 31, 2023, the City of San Bruno was allocated 1,155 housing units, including 358 very-low, 161 low-, 205 moderate-, and 431 above moderate income housing units. As reported in the latest Annual Housing Element Progress Report, the City of San Bruno as of December 31, 2021 has permitted 284 housing units during the Fifth RHNA cycle, including 20 very-low, 96 low-, 68 moderate-, and 100 above moderate-income

units, bringing the City’s total housing stock to 15,922 units. Within the City of San Bruno, there are a total of approximately 42,656 residents and 16,696 households, and an estimated 2.64 residents per household.^{[2][3]}

3.2 PROJECT DESCRIPTION

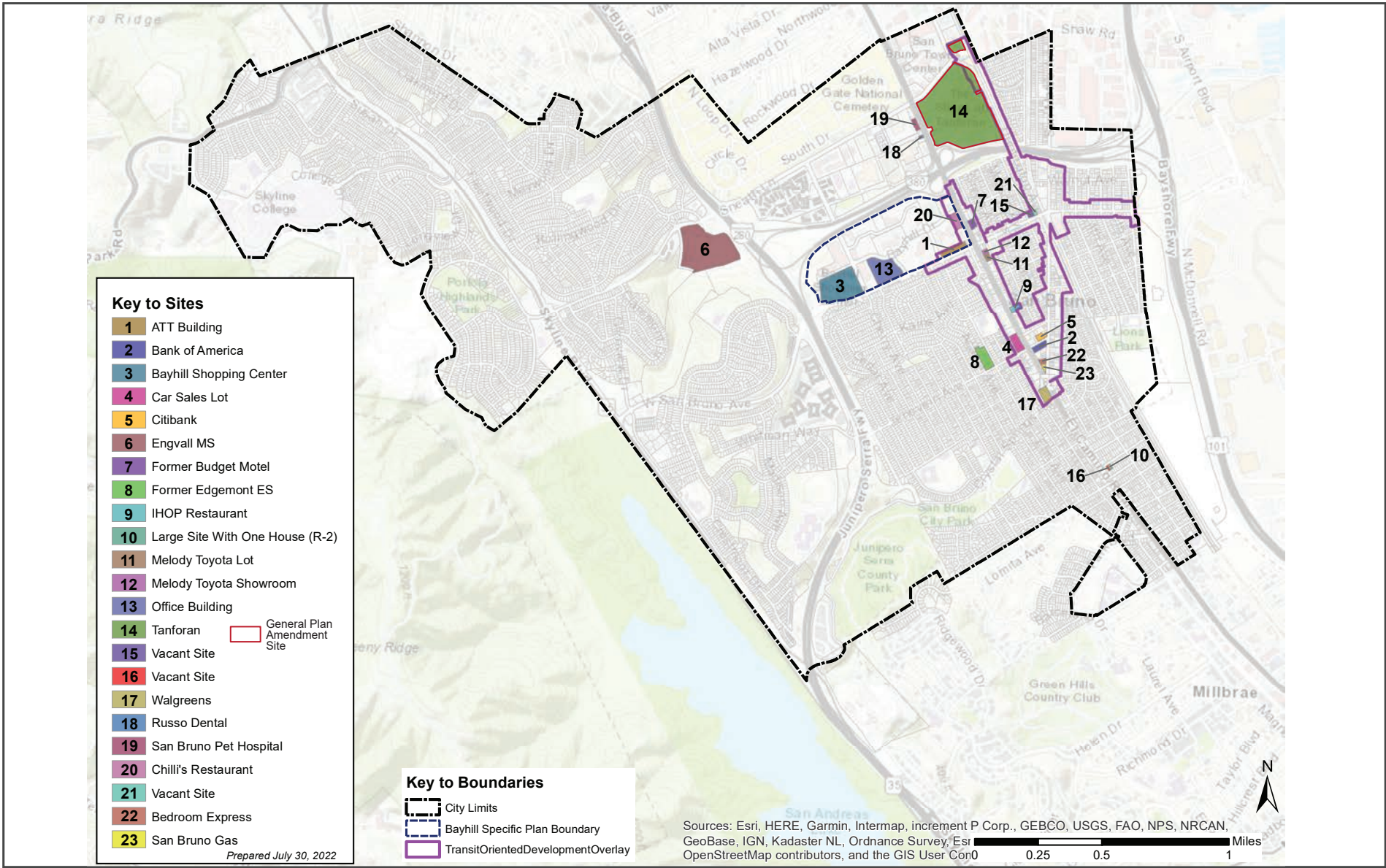
As required by Government Code Section 65583(a)(3), the Housing Element Update involves the preparation of an inventory of land suitable and available for residential development, including vacant sites and sites with a realistic and demonstrated potential for redevelopment during the planning period to meet the City’s housing need at the designated income levels (shown in Table 3.1-1). In accordance with the sites inventory requirements under California Government Code sections 65583(c), the project will also include a program that identifies actions that the City is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the 2023-2031 Housing Element through the administration of land use and development controls (including General Plan Amendments and rezoning). These project elements are discussed below. The Housing Element Update does not propose or approve any specific developments (i.e., construction of housing or related infrastructure) that could directly result in physical changes to the environment.

3.2.1 Housing Sites Inventory

In total, the City has identified 23 Housing Opportunity Sites that could be redeveloped with approximately 2,709 housing units. The locations of these Housing Opportunity Sites are shown on Figure 3.2-1, and aerials of individual groupings of Sites are shown on Figure 3.2-2 through Figure 3.2-7. Table 3.2-1 below reports the address and the approximate number of units that could be developed at each site under the proposed 2023-2031 Housing Element, as well as the current and proposed General Plan land use designation and zoning district.

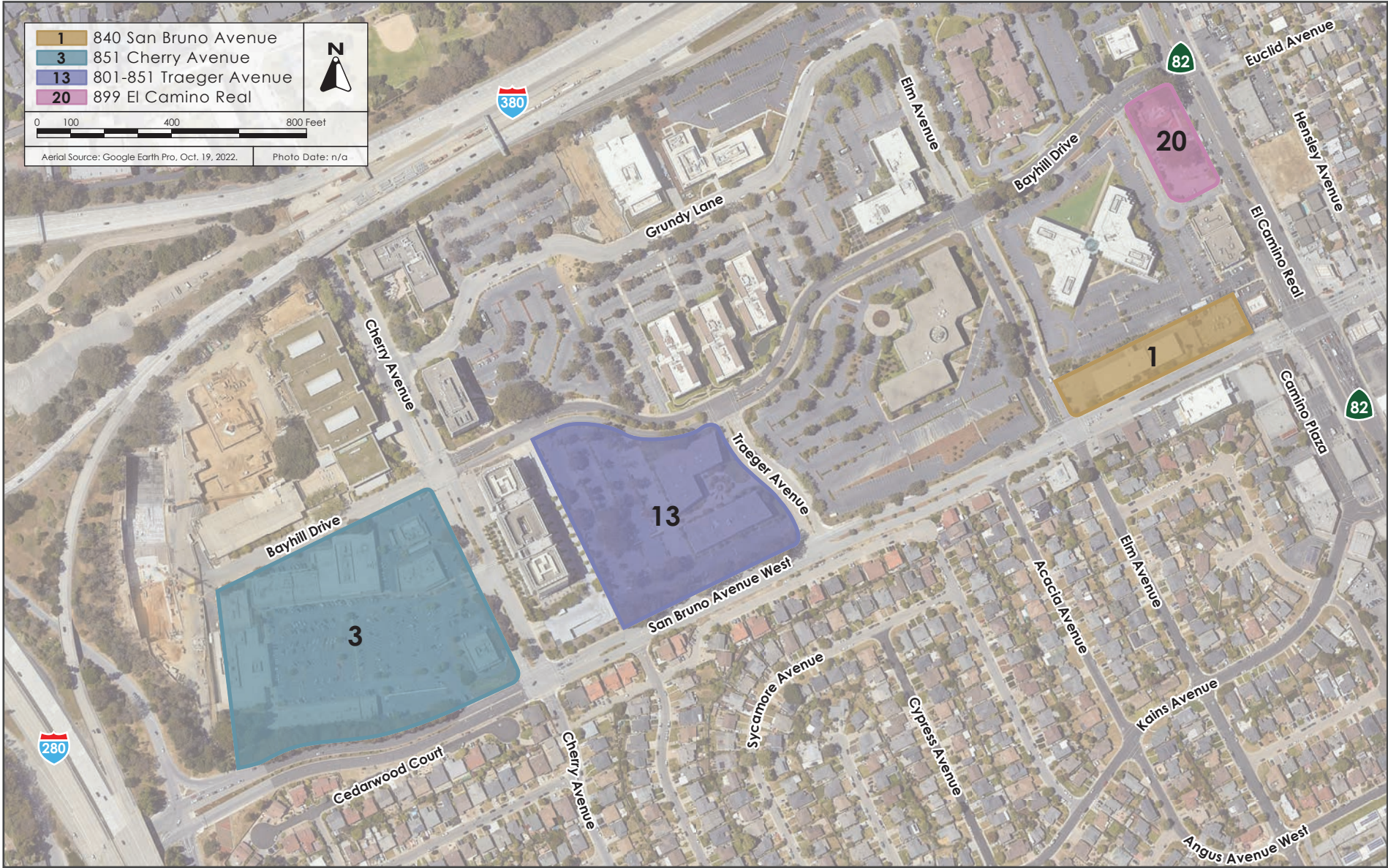
² California Department of Finance. “E-1 Population Estimates for Cities, Counties, and the State – January 1, 2021 and 2022.” Accessed August 4, 2022. <https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2022/>

³ United States Census Bureau. Quick Facts, San Bruno city, California. Accessed October 24, 2022. <https://www.census.gov/quickfacts/fact/table/sanbrunocitycalifornia/PST040219#qf-flag-X>



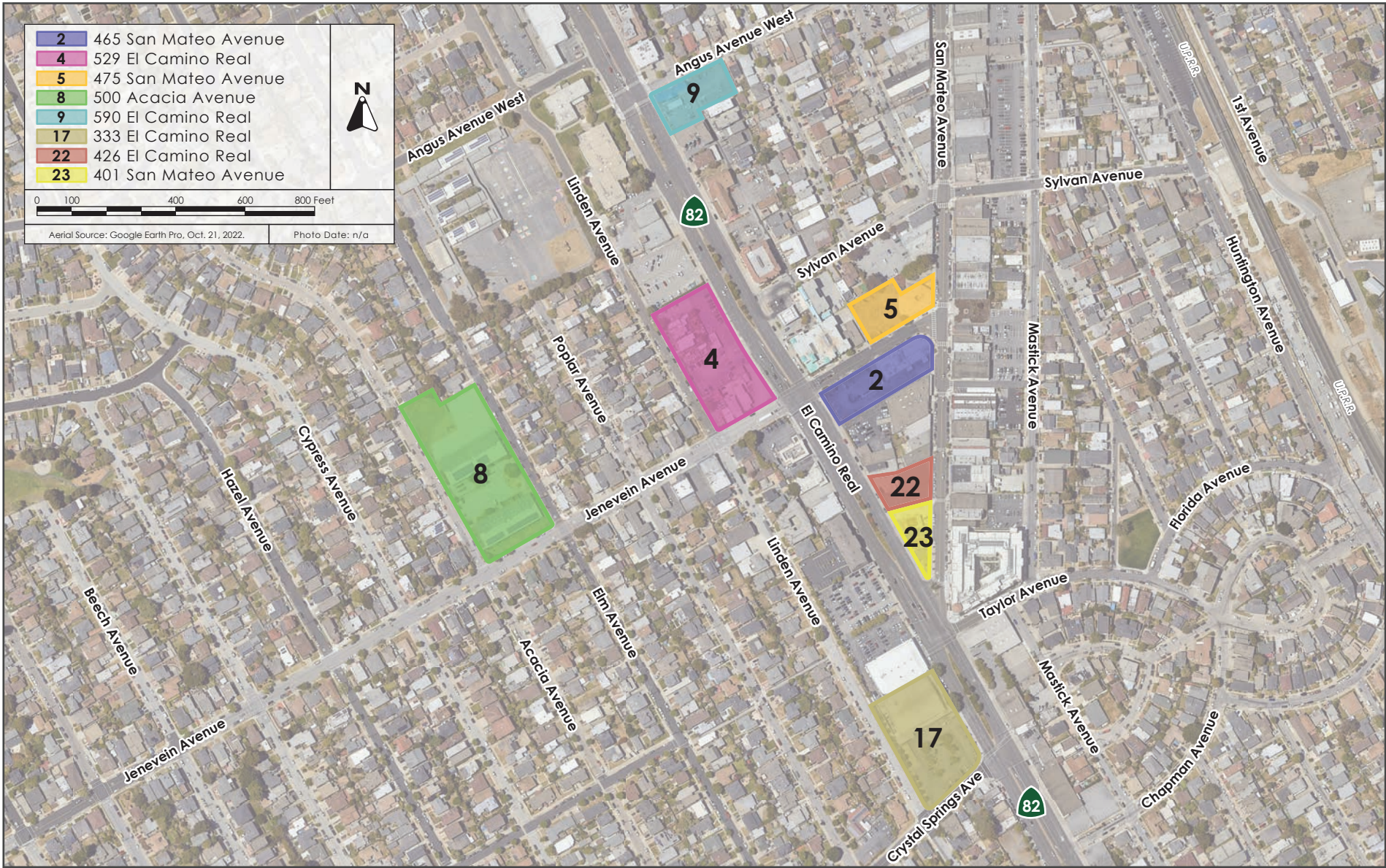
HOUSING OPPORTUNITY SITES

FIGURE 3.2-1



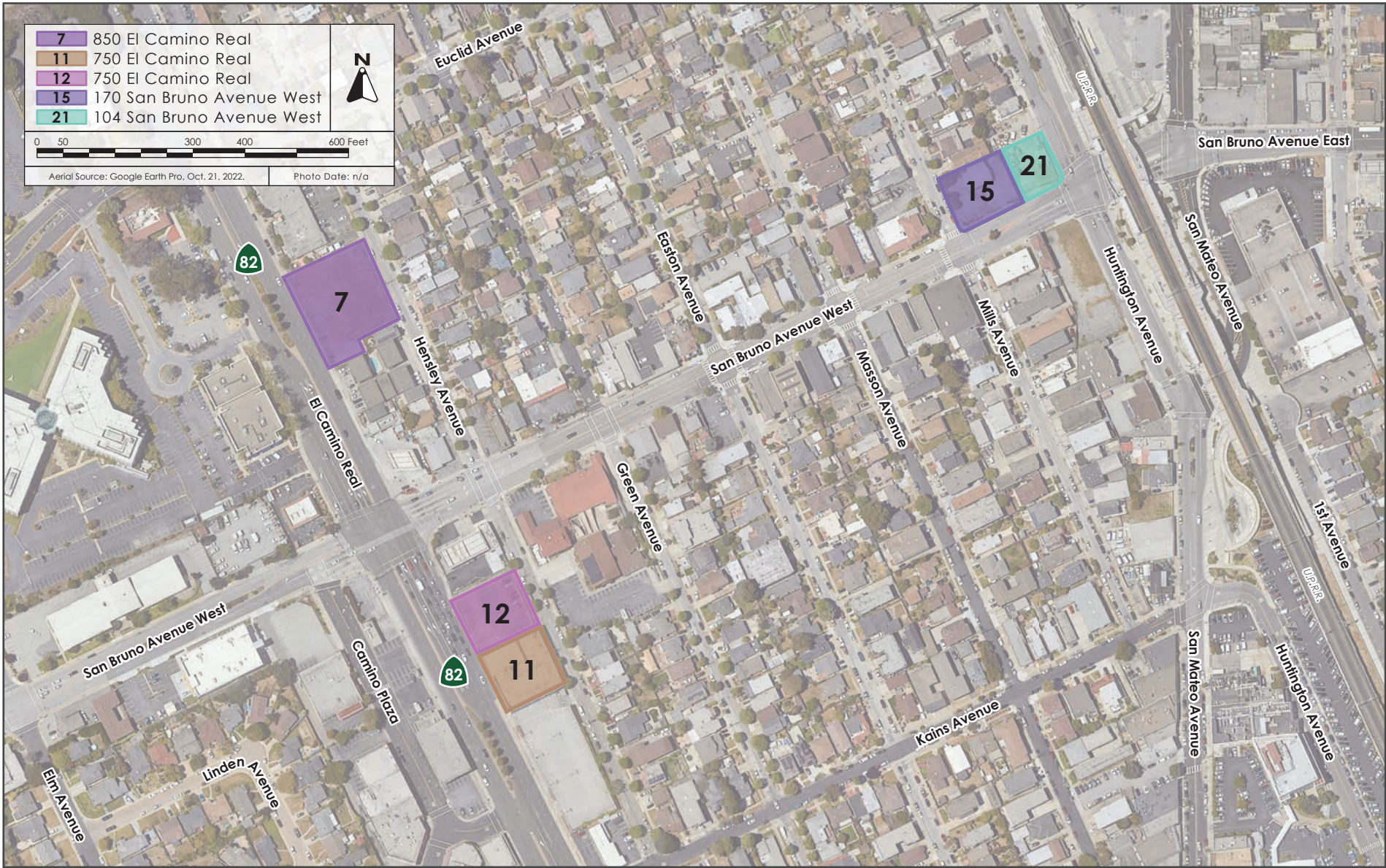
AERIAL PHOTOGRAPH OF HOUSING OPPORTUNITY SITES 1, 3, 13 & 20

FIGURE 3.2-2



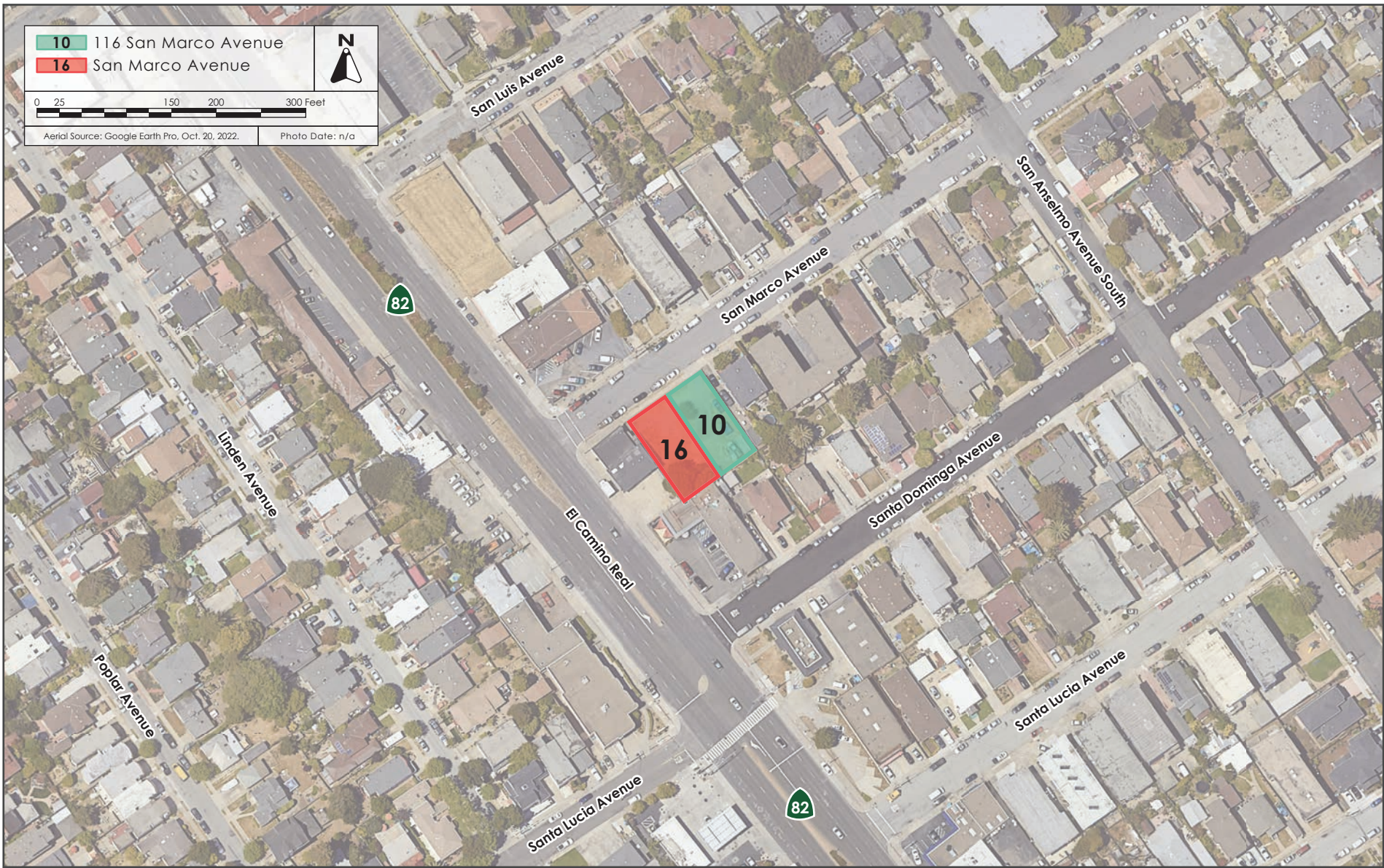
AERIAL PHOTOGRAPH OF HOUSING OPPORTUNITY SITES 2, 4, 5, 8, 9, 17, 22 & 23

FIGURE 3.2-3



AERIAL PHOTOGRAPH OF HOUSING OPPORTUNITY SITES 7, 11, 12, 15 & 21

FIGURE 3.2-4



AERIAL PHOTOGRAPH OF HOUSING OPPORTUNITY SITES 10 & 16

FIGURE 3.2-5





AERIAL PHOTOGRAPH OF HOUSING OPPORTUNITY SITE 6

FIGURE 3.2-7

Table 3.2-1: Inventory of Housing Opportunity Sites

Site ID – Existing Use	Address (APN)	General Plan Designation		Zoning District		Site Acreage	Housing Unit Capacity ¹
		Existing	Proposed	Existing	Proposed		
1 - AT&T Building*	840 San Bruno Avenue (020-071-050)	TOD	TOD	TOD-2	TOD-2	1.6	320
2 – Bank of America*	465 San Mateo Avenue (020-362-180)	TOD	TOD	CBD	CBD	0.5	45
3 – Bayhill Shopping Center^	851 Cherry Avenue (020- 012-190)	Regional Office	Regional Office	BNC	BNC	9.2	210
4 – Automobile retail*	529 El Camino Real (²)	TOD	TOD	TOD-2	TOD-2	1.4	72
5 – Citibank*	475 San Mateo Avenue (020- 361-240)	TOD	TOD	CBD	CBD	0.7	60
6 – San Bruno Golf Center	2101 Sneath Lane (019-270-260; - 270)	Low-Density Residential	Low-Density Residential	R-1	R-1	21.1	118
7 – Vacant Motel*	850 El Camino Real (020-116- 310)	TOD	TOD	TOD-2	TOD-2	0.6	60
8 – Edgemont Elementary School	500 Acacia Avenue (020- 253-050)	Low-Density Residential	Low-Density Residential	R-1	R-1	2.2	16

Table 3.2-1: Inventory of Housing Opportunity Sites

Site ID – Existing Use	Address (APN)	General Plan Designation		Zoning District		Site Acreage	Housing Unit Capacity ¹
		Existing	Proposed	Existing	Proposed		
9 – Restaurant /Parking Lot*	590 El Camino Real (020-145- 010; -020; -030; -470)	TOD	TOD	TOD-2	TOD-2	0.6	42
10 – Vacant Lot	117 San Marco Avenue (021- 172-130)	Low-Density Residential	Low-Density Residential	R-2	R-2	0.2	2
11 – Melody Toyota Lot*	750 El Camino Real (020-126- 050; -140)	TOD	TOD	TOD-2	TOD-2	0.4	41
12 – Melody Toyota Showroom*	750 El Camino Real (020-126- 200)	TOD	TOD	TOD-2	TOD-2	0.3	34
13 – Office Building^	801-851 Traeger Avenue (020- 017-020)	Regional Office	Regional Office	BRO	BRO	6.1	205
14 – Tanforan Shopping Center ³	1122-1150 El Camino Real (014-316-240; -300; -330; -360) 1292 Huntington Avenue (014- 311-060)	Regional Commercial	Regional Commercial	P-D	P-D	44	1,000
15 – Vacant Lot*	170 San Bruno Avenue (020- 111-160)	TOD	TOD	TOD-1	TOD-1	0.3	42

Table 3.2-1: Inventory of Housing Opportunity Sites

Site ID – Existing Use	Address (APN)	General Plan Designation		Zoning District		Site Acreage	Housing Unit Capacity ¹
		Existing	Proposed	Existing	Proposed		
<p>Notes:</p> <p>¹ The reported housing unit capacity is based on a combination of site acreage; floor area ratio, height, and density restrictions associated with the site’s land use designation and zoning district; and/or projects currently proposed at the sites identified.</p> <p>² APNs include: 020-256-090; -100; -130; -140; -150; -160; -170; -180; -190; -250; -260; -270; -280; -320; -340; -350.</p> <p>³ The Tanforan Shopping Center site is the only identified housing opportunity site that would require a General Plan Amendment and rezoning.</p> <p>* Indicates a site located within the Transit Corridors Plan area.</p> <p>^ Indicates a site located within the Bayhill Specific Plan area.</p>							

In addition to the 23 opportunity sites that are anticipated to accommodate approximately 2,709 housing units, the City has identified 669 units that have been approved and are expected to be permitted during the 2023-2031 Housing Element cycle, as well as 240 accessory dwelling units (ADUs), for a total of 3,618 units.⁴ A summary of the housing units by household income category is provided in Table 3.2-2.

Table 3.2-2: Summary of All Identified Housing Units					
Inventory Type	Household Income Category				Total Units
	Very-Low	Low	Moderate	Above-Moderate	
2023-2031 Housing Element Update	571	335	479	1,324	2,709
Pipeline Projects	38	47	32	553	669
ADUs	72	72	72	24	240
Total Units	681	454	583	1,900	3,618

3.2.2 General Plan Amendments and Rezoning

3.2.2.1 *Housing Opportunity Site 14*

Housing Opportunity Site 14 would require a General Plan Amendment and rezoning in order to complete buildout of the Housing Element Update. Housing Opportunity Site 19 would require a conforming rezoning to the TOD zoning district. Residential development of the other 21 Housing Opportunity Sites at the densities prescribed in the Housing Element Update are already allowed under their existing General Plan land use designations and zoning districts.

The Tanforan Shopping Center at Site 14 is planned for a maximum of 1,000 housing units which are not currently permitted at the site. Staff anticipates a master planning process for a transit-oriented, mixed-use development on the site that includes residential, office, and retail uses. On October 5, 2022, the property owner of Site 14 submitted a preliminary application to demolish the existing mall (excluding the Target and Century at Tanforan buildings) and redevelop the site with 1,000 housing units, an approximately two million square-foot office (life science) campus, and retail uses. The redevelopment of the property would be subject to amending the City's General Plan and amending the current P-D zoning district to incorporate potential additional uses such as office, housing, and retail land uses. The application will be processed by City staff, including completion of project-level CEQA environmental review, reviewed and recommended by Planning Commission before the City Council makes the final decision on the required discretionary approvals.

At this time, the specific land use designation and zoning district for which a General Plan Amendment and rezoning of Site 14 would be required is not known; as such, this Initial Study analyzes the reasonably foreseeable redevelopment of Site 14 with up to 1,000 residential units. The anticipated future amendment of Site 14's land use designation and zoning district would be

⁴ Pipeline units are those that have undergone CEQA review separately and received their discretionary entitlements, but have not yet received building permits.

evaluated for potential environmental impacts to confirm whether the GPA and rezoning are consistent with the conclusions of this Initial Study/MND or whether supplemental CEQA review would be required.

3.2.2.2 *Amendment of General Plan Policy HS-40*

General Plan Policy HS-40 currently reads as follows:

“Prohibit new residential development within the 70+ Airport CNEL areas, as dictated by Airport Land Use Commission infill criteria.”

The Housing Element Update would amend General Plan Policy HS-40 to read:

“Prohibit new residential development within the 70-75 Airport CNEL areas, as dictated by Airport Land Use Commission infill criteria, unless, on a project by project, a proposed residential development is approved through the Local Agency Override process consistent with the Public Utilities Code Section 21675.1(d).”

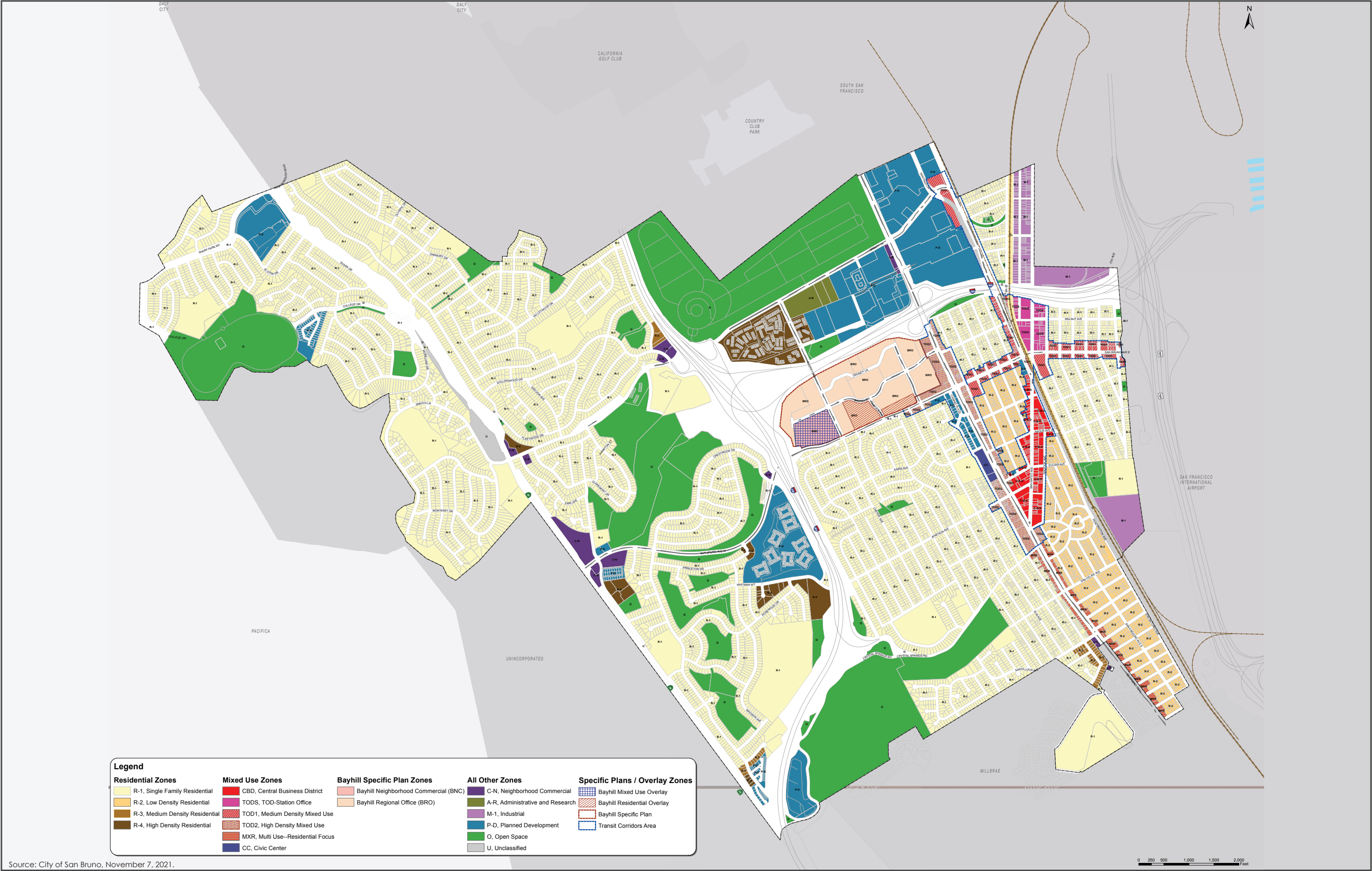
The revision to General Plan Policy HS-40 would allow for the future development of Housing Opportunity Sites 14 and 19 with residential uses. As documented in Section 4.13.1 under Impact NOI-3, modern noise insulation methods and materials can achieve a 45 dBA CNEL interior noise level as required by Title 24, Part 2 of the California Building Code, Policy NP-4.1 of the ALUCP, and Policy HS-35 of the San Bruno General Plan. Accordingly, amendment of General Plan Policy HS-40 to allow for the redevelopment of Sites 14 and 19 with residential uses would result in acceptable interior noise levels for future residents, and is not evaluated further in this Initial Study.

3.2.2.3 *Amendment of R-2 Zoning District*

The R-2 zoning district, as described in Section 12.96.070 of the San Bruno Municipal Code, currently allows one dwelling unit for every 2,900 square feet of lot area. The Housing Element Update would amend Section 12.96.070 to allow two dwelling units on all R-2 zoned parcels regardless of lot size, and require a minimum of two dwellings units per vacant lot for new development.

A study by ECONorthwest on behalf of the City determined that this amendment would result in approximately 10 new dwelling units distributed throughout the City.⁵ The future location of these 10 additional units is not reasonably foreseeable at this time, but it is anticipated that due to the distribution of R-2 zoned lots throughout the City (refer to Figure 3.2-8), these 10 additional units would not be grouped together such that the combined construction or operation of these units would cumulatively contribute to an environmental impact.

⁵ ECONorthwest. *Scenario Analysis Results*. July 2022.



Source: City of San Bruno, November 7, 2021.

CITY OF SAN BRUNO ZONING MAP

FIGURE 3.2-8

SECTION 4.0 ENVIRONMENTAL SETTING, CHECKLIST, AND IMPACT DISCUSSION

This section presents the discussion of impacts related to the following environmental subjects in their respective subsections:

4.1	Aesthetics	4.12	Mineral Resources
4.2	Agriculture and Forestry Resources	4.13	Noise
4.3	Air Quality	4.14	Population and Housing
4.4	Biological Resources	4.15	Public Services
4.5	Cultural Resources	4.16	Recreation
4.6	Energy	4.17	Transportation
4.7	Geology and Soils	4.18	Tribal Cultural Resources
4.8	Greenhouse Gas Emissions	4.19	Utilities and Service Systems
4.9	Hazards and Hazardous Materials	4.20	Wildfire
4.10	Hydrology and Water Quality	4.21	Mandatory Findings of Significance
4.11	Land Use and Planning		

The discussion for each environmental subject includes the following subsections:

- **Environmental Setting** – This subsection 1) provides a brief overview of relevant plans, policies, and regulations that compose the regulatory framework for the project and 2) describes the existing, physical environmental conditions at the project site and in the surrounding area, as relevant.
- **Impact Discussion** – This subsection 1) includes the recommended checklist questions from Appendix G of the CEQA Guidelines to assess impacts and 2) discusses the project’s impact on the environmental subject as related to the checklist questions. For significant impacts, feasible mitigation measures are identified. “Mitigation measures” are measures that will minimize, avoid, or eliminate a significant impact (CEQA Guidelines Section 15370). Each impact is numbered to correspond to the checklist question being answered. For example, Impact BIO-1 answers the first checklist question in the Biological Resources section. Mitigation measures are also numbered to correspond to the impact they address. For example, MM BIO-1.3 refers to the third mitigation measure for the first impact in the Biological Resources section.

4.1 AESTHETICS

4.1.1 Environmental Setting

4.1.1.1 *Regulatory Framework*

State

Senate Bill 743

Senate Bill (SB) 743 was adopted in 2013 and requires lead agencies to use alternatives to level of service (LOS) for evaluating transportation impacts, specifically vehicle miles traveled (VMT). SB 743 also included changes to CEQA that apply to transit-oriented developments, as related to aesthetics and parking impacts. Under SB 743, a project's aesthetic impacts will no longer be considered significant impacts on the environment if:

- The project is a residential, mixed-use residential, or employment center project, and
- The project is located on an infill site within a transit priority area.⁶

SB 743 also clarifies that local governments retain their ability to regulate a project's aesthetics impacts outside of the CEQA process.

Streets and Highway Code Sections 260 through 263

The California Scenic Highway Program (Streets and Highway Code, Sections 260 through 263) is managed by Caltrans. The program is intended to protect and enhance the natural scenic beauty of California highways and adjacent corridors through special conservation treatment.

In San Mateo County, there are three state-designated scenic highways, including California State Route 1 (SR 1) segment between south of Half Moon Bay to the Santa Cruz County line, California State Route 35 (SR 35) segment between State Route 92 (SR 92) intersection to Santa Cruz County Line, and Interstate 280 (I-280) segment near the City of San Bruno to Santa Clara County line. I-280 is the only state-designated scenic highway within the San Bruno city limits.

⁶ Pursuant to Public Resources Code 21061.3: An "infill site" is defined as "a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses." Pursuant to Public Resources Code 21099(a)(7): A "transit priority area" is defined as "an area within 0.5 mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations."

Pursuant to Public Resources Code 21064.3: A "major transit stop" means "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods."

Regional and Local

County of San Mateo General Plan

The County of San Mateo General Plan states that Crystal Springs Road, El Camino Real (from Easton Drive to Crystal Springs Road), and Sharp Park Road are County-designated scenic roads.⁷

City of San Bruno General Plan

A scenic corridor is defined in the San Bruno General Plan as a “roadway or highway with unique or distinctive physical or cultural features”. The General Plan identifies one state-designated scenic corridor, I-280, and one local scenic corridor, Skyline Boulevard (Highway 35), which is also eligible for designation as a State Scenic Highway. San Bruno recognizes Sneath Lane, Crystal Springs Road, and Sharp Park Road as local scenic corridors. The City is also a participant in the Grand Boulevard Initiative, which seeks to turn El Camino Real into a “grand boulevard of meaningful destinations” with high quality building designs.

The City of San Bruno General Plan identifies views from hills to the north and west as a prominent visual backdrop. Scenic vistas include views from San Bruno Mountain, Sweeney Ridge, and Skyline College, which is recessed into the hillsides and is shielded from view.

The City’s General Plan contains the following relevant policies:

Policies	Description
LUD-E	Ensure that new development, especially in residential neighborhoods, is sensitive to existing uses, and is of the highest quality design and construction.
LUD-3	During Plan review, protect the residential character of established neighborhoods by ensuring that new development conforms to surrounding design and scale.
LUD-4	Strengthen residential integrity in viable neighborhoods within the city’s Redevelopment Area by eliminating incompatible uses and by facilitating upgrading of deteriorated structures.
LUD-7	Require any subdivision or development involving construction of more than five units, regardless of the number of parcels, to undergo design review. Require provision of open spaces and pedestrian connections within multifamily projects, as well as an active street frontage along arterial roadways.
LUD-8	Develop and implement standards in the City’s Zoning Ordinance and Subdivision Regulations that minimize the visual dominance of garages in multifamily complexes. Use the following design techniques: <ul style="list-style-type: none">• Locate garages and carports to the rear of parcels;• Provide access to tuck-under parking from the side or rear of parcels, particularly along major arterial roadways;• Screen tuck-under parking with landscaping or other buffering techniques; and• Continue to allow shared driveway configurations, as appropriate.

⁷ San Mateo County. *General Plan*. November 1986.

Policies	Description
LUD-12	<p>Improve the visibility of Downtown from El Camino Real through a variety of techniques that may include signage, lighting, landscape treatment, or provision of plaza or building design that “announces” Downtown.</p> <ul style="list-style-type: none"> • Require buildings along the intersection to present attractive and pleasant facades where visible from El Camino Real, including windows, displays and entryways (transparency) at ground level. • Incorporate a historical marker to identify the intersection as the beginning of the California State Highway system. • Improve the visibility of Downtown by expanding streetscaping and amenities to parcels on the west side of El Camino Real. Install directional signage or banners along El Camino Real to announce Downtown. Consider use of signage arching over El Camino Real were Caltrans to abandon State Highway designation for El Camino Real. • Place clearly marked crosswalks and traffic lights to ensure the safety of residents and visitors entering Downtown from across El Camino Real. • Work with Caltrans and other agencies to modify El Camino Real street design to implement traffic calming measures that ensure safe pedestrian and bicycle access to Downtown.
LUD-15	<p>Require pedestrian-oriented building design, including zero front setbacks (except where noted for public plazas), awnings, and building entries facing the street – to complement the city’s Downtown streetscape improvements.</p>
LUD-21	<p>Strengthen the identity of the existing internal “street” network in The Shops at Tanforan and Towne Center. Encourage transition of these two centers into an outdoor/indoor shopping “district,” as illustrated in Figure 2-6. Implement the following design techniques:</p> <ul style="list-style-type: none"> • Promote reuse and infill of existing surface parking lots. • Strengthen the existing internal street network (as shown in the concept diagram) to promote walkability between stores, services, and restaurants. • Ensure that the street network links the two shopping centers and preserves the visibility of the existing shopping complexes from El Camino Real. • Design all new commercial spaces to be located and oriented toward the walkable internal streets and toward Sneath Lane, with clear connections to enclosed mall entrances. • Create fluid and visible pedestrian connections to and from the San Bruno BART Station. • In accordance with Ordinance 1284, consider construction of necessary parking structures to replace existing surface parking lots. Locate parking structures along the edges of the shopping district to minimize vehicular traffic on internal pedestrian-oriented streets. • Improve landscaping along El Camino Real to differentiate and announce the “district” from other developments along El Camino Real. • Incorporate gateway features on El Camino Real near the northern edge of Towne Center where San Bruno’s northern boundary exists. • Develop a uniform signage plan to coordinate signs along the internal shopping streets with signs along El Camino Real.

Policies	Description
	<ul style="list-style-type: none"> Coordinate with the San Bruno Chamber of Commerce to market the new “district” as a regional marketplace.
LUD-25	Coordinate new development at the BART and Caltrain station areas with surrounding residential neighborhoods through landscaping, feathered building heights (taller buildings near stations and shorter buildings near existing residences), pedestrian connections, and other such techniques.
LUD-33	Plant additional street trees along the existing buffer between Huntington Avenue and the residential frontage road due east of the San Bruno BART Station.
LUD-44	<p>Require multi-use developments along El Camino Real to provide a pedestrian-friendly environment along the street frontage, as follows:</p> <ul style="list-style-type: none"> Require a minimum ground floor transparency requirement for all development north of Crystal Springs Road. Encourage pedestrian-scale architectural articulation (that is, awnings at appropriate heights). Require that buildings are located adjacent to the sidewalk, and that main entries are oriented toward the sidewalk. Locate parking lots at the side or rear of parcels. Buffer parking areas from the sidewalk with landscaping. Minimize curb cuts and parking access from El Camino Real. Limit front setbacks to create an active street frontage.
LUD-49	Minimize building setbacks, orient building entrances toward the street (not parking lots), and vary features along the building façades on San Bruno Avenue.
LUD-69	Conduct a design review of all development in “Areas visible from all sites” in Figure 2-3 to ensure it is not visually over-dominant.
LUD-70	Provide incentives for developers to create view corridors from El Camino Real and Sneath Lane toward new internal open spaces at The Shops at Tanforan and Towne Center.
LUD-72	Require buildings in Downtown and in Transit-oriented Development district to screen mechanical equipment on the roof with non-glaring materials.
LUD-73	Require buildings with a continuous façade of 100 feet or longer to use non-reflective materials to minimize adverse impact of glare.
T-18	Require right-of-way landscaping to be maintained at an appropriate scale, so as to not reduce visibility at intersections.
T-25	Coordinate with Caltrans, San Mateo County, and adjacent cities in order to maintain a consistent approach in applying scenic conservation standards in roadway design, improvements, and maintenance.
T-26	Continue to limit widening, modification, or realignment of the City’s scenic corridors, consistent with Ordinance 1284. Preserve large trees and other natural features, limit signage, maintain wide setbacks, and reduce traffic speeds along these roadways.
T-27	Continue to support beautification efforts along Interstate 280, an officially designated State Scenic Highway.
T-28	<p>Recognize and protect the following as local scenic corridors:</p> <ul style="list-style-type: none"> Skyline Boulevard, State Scenic Highway

Policies	Description
	<ul style="list-style-type: none"> • Crystal Springs Road, County Scenic Road • Sharp Park Road, County Scenic Road • Sneath Lane
T-29	Review and update the City's Scenic Corridor Protection Program for I-280, Skyline Boulevard, and future State-designated scenic highways.
T-30	<p>Improve the appearance of the following streets:</p> <ul style="list-style-type: none"> • El Camino Real: Continue landscaping the median strips and review projects for good design. Coordinate landscaping design with neighboring jurisdictions. • San Mateo Avenue: Continue implementation of the Street Beautification Plan in conjunction with merchants and property owners. • San Bruno Avenue (west of El Camino Real): Retain trees on Bayhill property along San Bruno Avenue, consistent with the City's Tree Preservation policy. • Huntington Avenue/railroad tracks: Continue landscaping along both sides of the railroad tracks.
T-32	Encourage design of public and private development to frame vistas of the Downtown, public buildings, parks, and natural features.
T-33	Promote and facilitate planting of shade trees along all streets within San Bruno, through public education, developer incentives, and general beautification funds. Tree specifics should be selected to create a unified image and an effective canopy.
T-42	Do not allow parking lots to dominate the frontage of mixed-use streets, interrupt pedestrian routes, or negatively impact surrounding neighborhoods.
T-76	Require construction of sidewalks at least five (5) feet wide along newly built streets within San Bruno, and four (4) feet wide on older streets to preserve street character in older neighborhoods.
T-77	<p>Create a pedestrian-oriented setting along the Pedestrian Emphasis Zones (see Figure 4-6) through potential construction of the following public improvements:</p> <ul style="list-style-type: none"> • Brick pavers to make sidewalks look more distinct; • Street trees to soften the environment and provide color and shade; • Human-scale street lights for enhanced aesthetics and illumination; • Banners and flags to make the area look more festive and cheerful; and • Benches to give people a place to sit, rest, and watch what goes on around them.
T-78	Allow new development to contribute to the Pedestrian Emphasis Zones (Figure 4-6) through construction of off-site improvements.
OSR-28	Preserve Crestmoor Canyon in a natural state. Minimize changes to natural landforms, topography, rock outcroppings, mature tree stands, and other vegetation, while accommodating a multi-use trail and supporting facilities. Exceptions may be made for any necessary changes in order to improve slope stability.
OSR-32	During plan review, assure that development on city lands is compatible with preservation of Crestmoor Canyon, Junipero Serra Park, San Francisco Peninsula Watershed lands, Golden Gate National Recreation Area, and San Francisco International Airport wetlands in a natural state.

Policies	Description
OSR-33	Balance fire prevention goals with the preservation of the mature tree stands along the city's scenic corridors, including Sneath Lane, Skyline Boulevard, I-280, and Crystal Springs Road, consistent with the Tree Preservation Ordinance and Ordinance 1284. Landscaping of public rights-of-way along these corridors should complement the natural state.
OSR-34	Protect mature trees, as feasible, during new construction and redevelopment. Require identification of all trees over six inches in diameter and approval of landscaping plans during design review.
ERC-2	Preserve as open space those portions of property which have significant value to the public as scenic resources, aesthetic, or recreation purposes.
ERC-3	Protect natural vegetation in park, open space, and scenic areas as wildlife habitat, to prevent erosion, and to serve as noise and scenic buffers.
ERC-9	Preserve mature trees and vegetation, including wildflowers, within open canyon areas and along the city's scenic roadways.
ERC-10	Require incorporation of native plants into landscape plans for new development as feasible – especially in areas adjacent to natural areas, such as canyons or scenic roadways (Figure 6-1). Require preservation of mature trees, as feasible, during design and construction.
ERC-12	Balance the need for fire safety and invasive plant species management with new considerations along the city's scenic corridors. Encourage buildings to be located outside of the tree's drip-line or 12 feet from the tree trunk, whichever is greater, and/or incorporating special techniques to minimize root damage, etc.
ERC-40	Ensure that new development adjacent to historic structures is compatible with the character of the structure and the surrounding neighborhood.
PFS-24	Require provision of attractive, convenient recycling bins and trash enclosures in grouped development projects (i.e., multi-family residential projects, office complexes, and commercial shopping centers).
PFS-65	Require new development to incorporate passive heating and natural lighting strategies if feasible and practical. These strategies should include, but are not limited to, the following: <ul style="list-style-type: none"> • Using building orientation, mass and form, including façade, roof, and choice of building materials, color, type of glazing, and insulation to minimize heat loss during winter months and heat gain during the summer months; • Designing building openings to regulate internal climate and maximize natural lighting, while keeping glare to a minimum; and • Reducing heat-island effect of large concrete roofs and parking surfaces.

City of San Bruno Municipal Code

Title 12, Land Use, Article III, Zoning of the San Bruno Municipal Code sets forth specific design guidelines, height limits, building density, building design and landscaping standards, architectural features, and open space and setback requirements.

Residential Design Guidelines

Title 12 of the San Bruno Municipal Code requires that all changes to the exterior design of single-family and two-family residences in the City requiring discretionary approval or a building permit be consistent with San Bruno's Residential Design Guidelines. The Residential Design Guidelines identify basic design principles to be followed by all residential exterior improvements, additions, and new construction projects, as well as specific guidance on a wide variety of architectural considerations, such as neighborhood compatibility, setbacks, materials and colors, etc.

Tree Preservation Policies

Chapter 8.24 of the City of San Bruno Municipal Code, “Street Trees and Other Plantings” regulates the planting and maintenance of trees and other plantings in and along the public streets, ways, and public easements within the city. Chapter 8.25, “Heritage Trees”, protects certain trees located on private property within the City of San Bruno, including:

1. Any native bay (*Umbellularia californica*), buckeye (*Aesculus species*), oak (*Quercus species*), redwood (*Sequoia sempervirens*), or pine (*Pinus radiata*) tree that has a diameter of six inches or more measured at fifty-four inches above natural grade;
2. Any tree or stand of trees designated by resolution of the city council to be of special historical value or of significant community benefit;
3. A stand of trees, the nature of which makes each dependent on the others for survival; or
4. Any other tree with a trunk diameter of ten inches or more, measured at fifty-four inches above natural grade.

Ordinance 1284

Adopted in June 1977, this ordinance limits building heights to 50 feet or three stories unless approved by City voters and prohibits increases of residential densities in areas zoned residential as of 1974.

Transit Corridors Plan

As noted in Section 3.1.1.1, Housing Opportunity Sites 1, 2, 4, 5, 7, 9, 11, 12, 15, 17, 20, 21, 22, and 23 are located within the TCP area. The TCP identifies five “Character Areas” with unique visual characters and development objectives: San Mateo Avenue, El Camino Real, Huntington Avenue, Station Area, and the Central Business District. Additionally, the TCP includes development standards and design guidelines that govern future private development actions in the TCP area.

Bayhill Specific Plan

As noted in Section 3.1.1.1, Housing Opportunity Sites 3 and 13 are located within the Bayhill Specific Plan area. Chapter Three of the Bayhill Specific Plan includes mandatory “Urban Design Policies” and discretionary “Urban Design Guidelines” which are intended to serve as the design review criteria for future private development within the Bayhill Specific Plan area.

4.1.1.2 *Existing Conditions*

General Plan and Municipal Code Conforming Sites

Residential development at the densities proposed by the Housing Element Update (refer to Table 3.2-1) are allowed at Housing Opportunity Sites 6, 8, 10, 16, 18, and 19 under their existing General Plan land use designation and zoning district regulations, and therefore no General Plan amendments or rezoning is required. The existing conditions at these sites related to aesthetics are discussed below.

Housing Opportunity Site 6

Housing Opportunity Site 6 is currently developed with multiple uses, including a privately operated golf driving range, parking lot storage for a private bus operator, and a maintenance building for the San Bruno Park School District. No potentially historic buildings or rock outcroppings are present on-site, although a significant number of mature trees are present. The existing golf driving range operates approximately 60-foot tall pole mounted lights that generate substantial amounts of light and glare when operational post-sunset. During the day and post-close of business, the site generates little to no light and glare.

Site 6 is bordered by I-280 (a state-scenic highway) to the east and the Crestmoor Canyon open space areas in all other directions. Beyond Crestmoor Canyon are single-family residences to the west, north, and south as well as two gas stations across Sneath Lane to the north. Since the project site is recessed into the hillside, views of Sweeney Ridge and San Bruno Mountain are limited. Due to intervening vegetation and topography, Site 6 is only minimally visible from I-280 and is not visible from any other state-, county-, or locally-designated scenic road or corridor. Light and glare generated by car headlights on I-280 and lighting of the single-family residences and gas stations in the surrounding area are consistent with these types of uses.

Housing Opportunity Site 8

Housing Opportunity Site 8 is currently developed with the former Edgemont Elementary School campus. The campus consists of two one-story gabled-roof buildings with rooftop solar panels, a surface parking lot, and a playground area. Light and glare generated by the campus buildings are consistent with the light and glare generated by surrounding single-family residential development. Site 8 is mapped within a Transit Priority Area (TPA).⁸

Site 8 is located in an urbanized area surrounded on all sides by one-story single-family residential development. No potentially historic buildings or rock outcroppings are present on-site, although a number of mature trees are present. Due to distance and/or intervening development and topography, views of Sweeney Ridge and San Bruno Mountain are limited, and none of the state-, county, or locally-designated scenic corridors or roadways are visible from Site 8.

⁸ Metropolitan Transportation Commission. "Transit Priority Areas (2021)". Accessed October 21, 2022. <https://www.arcgis.com/apps/mapviewer/index.html?panel=gallery&suggestField=true&layers=370de9dc4d65402d992a769bf6ac8ef5>

Housing Opportunity Sites 10 and 16

Housing Opportunity Sites 10 and 16 are vacant dirt lots that are located adjacent to each other on San Marco Avenue. Access to San Marco Avenue is provided via El Camino Real. No potentially historic buildings or rock outcroppings are present on-site, although a number of mature trees are present. Since Sites 10 and 16 are undeveloped and they do not currently generate any light or glare; light and glare in the surrounding area is typical of urbanized areas. Sites 10 and 16 are mapped within a TPA.⁹

Sites 10 and 16 are located in an urbanized area developed with mostly single-family residential development and various commercial uses along the El Camino Real corridor to the immediate west of the sites. Due to distance and/or intervening topography and development around Sites 10 and 16, views of Sweeney Ridge and San Bruno Mountain are extremely limited, and there are no views to and from I-280. Sites 10 and 16 are not visible from any state-, county-, or locally-designated scenic corridor or roadway.

Housing Opportunity Site 18

Housing Opportunity Site 18 is developed with a two-story flat-roofed brick building with sloped awnings over the first level, a surface parking lot, and a plaza at the corner of West 1st Street and Commodore Drive. No potentially historic buildings or rock outcroppings are present on-site, although a number of mature trees are present. Minimal amounts of light and glare are generated by the existing development, which is minimally lighted at nighttime and has limited amounts of glass on the building exterior. Site 18 is mapped within a TPA.¹⁰

Opposite Site 18 across El Camino Real to the east is the Shops at Tanforan development, which is located within Housing Opportunity Site 14, discussed below. Commercial uses are present to the north and south along El Camino Real, and multi-family residential developments and the Marine Corps Reserve Center are located west of the project site. Due to distance and/or intervening topography and development, Site 18 is not visible from Sweeney Ridge or I-280. However, Site 18 is visible from the San Bruno Mountain and Sneath Lane, a locally-designated scenic corridor, to the north. Light and glare generated by surrounding uses and traffic along El Camino Real and surrounding roadways are typical of urbanized areas.

Housing Opportunity Site 19

Housing Opportunity Site 19 is developed with a single-story flat-roofed building and surface parking lot. No potentially historic buildings, rock outcroppings, or mature trees are present on-site. Minimal amounts of light and glare are generated by the existing development, which is minimally

⁹ Metropolitan Transportation Commission. "Transit Priority Areas (2021)". Accessed October 21, 2022. <https://www.arcgis.com/apps/mapviewer/index.html?panel=gallery&suggestField=true&layers=370de9dc4d65402d992a769bf6ac8ef5>

¹⁰ Metropolitan Transportation Commission. "Transit Priority Areas (2021)". Accessed October 21, 2022. <https://www.arcgis.com/apps/mapviewer/index.html?panel=gallery&suggestField=true&layers=370de9dc4d65402d992a769bf6ac8ef5>

lighted at nighttime and has limited amounts of glass on the building exterior. Site 19 is mapped within a TPA.¹¹

Site 19 is located approximately 300 feet north of Site 18. As noted above, the Shops at Tanforan development is located to the east, commercial uses are present to the north and south along El Camino Real, and multi-family residential developments and the Marine Corps Reserve Center are located to the west. Due to distance and/or intervening topography and development, Site 19 is not visible from Sweeney Ridge or I-280. Like Site 18, Site 19 is visible from the San Bruno Mountain and Sneath Lane, a locally-designated scenic corridor, to the north. Light and glare generated by surrounding uses and traffic along El Camino Real and surrounding roadways are typical of urbanized areas.

Transit Corridors Plan Area Sites

As discussed in Section 3.1.1.1, Housing Opportunity Sites 1, 2, 4, 5, 7, 9, 11, 12, 15, 17, 20, 21, 22, and 23 are located within the TCP area. The TCP area is fully urbanized and characterized by diverse land uses, building forms, parcel sizes and surface parking lots. As discussed in Section 4.1.1.1, the TCP divides the TCP area into five character areas with unique visual characters and development objectives: San Mateo Avenue, El Camino Real, Huntington Avenue, Station Area, and the Central Business District. All Transit Corridor Plan sites are mapped within a TPA.¹²

Various vantage points throughout the TCP area have views of the western and northern ridgelines, including Sweeney Ridge to the west and San Bruno Mountain to the north, both of which are identified as scenic vistas in the City's General Plan. None of the state-, county-, or locally-designated scenic roads/corridors (refer to Section 4.1.1.1) intersect the TCP area, although portions of the TCP area may be partially visible from these roadways.

Lighting within the TCP area includes those sources common to urban areas, including street and freeway lights, parking lot lighting, building lighting, illuminated signs, vehicle headlamps and interior lighting visible through windows. Existing sources of glare in and around the TCP area are also those common to such urban areas, including reflection of sunlight and artificial light off of windows, buildings and other surfaces in the day, and glare from inadequately shielded and improperly directed light sources at night.

Bayhill Specific Plan Area Sites

As discussed in Section 3.1.1.2, Housing Opportunity Sites 3 and 13 are located within the urbanized Bayhill Specific Plan area. The Bayhill Specific Plan area is approximately 92.2 acres in size and encompasses the Bayhill Office Park, Bayhill Shopping Center, and Marriott Courtyard Hotel. Most of the Bayhill Specific Plan area was developed in the 1970s, and streets and buildings reflect the suburban, auto-oriented character of development at the time. Stand-alone buildings are surrounded

¹¹ Metropolitan Transportation Commission. "Transit Priority Areas (2021)". Accessed October 21, 2022. <https://www.arcgis.com/apps/mapviewer/index.html?panel=gallery&suggestField=true&layers=370de9dc4d65402d992a769bf6ac8ef5>

¹² Metropolitan Transportation Commission. "Transit Priority Areas (2021)". Accessed October 21, 2022. <https://www.arcgis.com/apps/mapviewer/index.html?panel=gallery&suggestField=true&layers=370de9dc4d65402d992a769bf6ac8ef5>

by large parking lots. Most buildings are concrete and glass, with “blocky” forms typical of 1970s and 1980s commercial building design. Heights range from one-story retail buildings in the Bayhill Shopping Center, to six-story buildings at 900 and 850 Cherry Avenue. Landscape features include frontage lawns, roadway medians, and parking lot islands with a focus on screening and shading the considerable expanses of surface parking. Site 13 is mapped within a TPA.¹³

Due to distance and/or intervening development and topography, views of Sweeney Ridge and San Bruno Mountain from the Bayhill Specific Plan area are limited. None of the state-, county-, or locally-designated scenic roads/corridors (refer to Section 4.1.1.1) intersect the Bayhill Specific Plan area; however, I-280 is adjacent to the western border of the Bayhill Specific Plan area. Views from I-280 of the Bayhill Specific Plan area are extremely limited due to screening from intervening vegetation that borders the northbound I-280 lanes.

Existing buildings include night lighting in addition to security lights that remain illuminated through the night. Surface parking lots are well lit. Glass and reflective surfaces on buildings and vehicles, on streets, and in parking lots contribute to a limited amount of glare that is typical of a suburban office park. Due to the urbanized nature of the surrounding area, a substantial amount of ambient nighttime lighting currently exists, affecting views of the nighttime sky.

Housing Opportunity Site 14

Housing Opportunity Site 14 consists of 1122-1188 El Camino Real/300 Tanforan Shopping Center (APNs: 014-316-240; -300; -330; -360), which is developed with the Shops at Tanforan shopping mall, and 1292 Huntington Avenue (APN: 014-311-060), which is located opposite the Shops at Tanforan across the Sneath Lane/Huntington Avenue intersection and is developed with a vacant paved lot.

The Shops at Tanforan development occupies a 44-acre super-block bounded by Sneath Lane to the north, Huntington Avenue to the east, Interstate 380 (I-380) to the south, and El Camino Real to the west. The Shops at Tanforan consists of a 970,000 square-foot shopping mall with building heights of up to 126 feet, nine inches above mean sea level (AMSL), which is surrounded by aboveground parking garages and surface parking lots. In 2005, the Shops at Tanforan underwent major renovations, and is of modern, conventional construction and design. The Shops at Tanforan generates a substantial amount of light associated with lighting of the mall and surrounding parking lots at night, but only limited amounts of glare due to the lack of large uninterrupted expanses of glass. Site 14 is mapped within a TPA.¹⁴

Housing Opportunity Site 14 is located adjacent to Sneath Lane, and is visible from San Bruno Mountain and Sweeney Ridge. Visibility from any other county- or locally-designated scenic corridor or roadway is limited. Site 14 is located within a heavily urbanized area and is surrounded by single-family residential development to the east across Huntington Avenue and south across I-

¹³ Metropolitan Transportation Commission. “Transit Priority Areas (2021)”. Accessed October 21, 2022. <https://www.arcgis.com/apps/mapviewer/index.html?panel=gallery&suggestField=true&layers=370de9dc4d65402d992a769bf6ac8ef5>

¹⁴ Metropolitan Transportation Commission. “Transit Priority Areas (2021)”. Accessed October 21, 2022. <https://www.arcgis.com/apps/mapviewer/index.html?panel=gallery&suggestField=true&layers=370de9dc4d65402d992a769bf6ac8ef5>

380 freeway, multi-family residential and commercial uses and the Marine Corps Reserve Center to the west, and a wide variety of development to the north, including the San Bruno Towne Center retail plaza, hotels, movie theatres, and other commercial and retail uses. Due to the urbanized nature of the surrounding area, light sources include street and freeway lights, parking lot lighting, building lighting, illuminated signs, vehicle headlamps, and interior lighting visible through windows. Glare sources include reflection of sunlight and artificial light off of windows, buildings and other surfaces in the day, and inadequately shielded and improperly directed light sources at night.

4.1.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
1) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? ¹⁵ If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Impact AES-1: The project would not have a substantial adverse effect on a scenic vista.
(Less than Significant Impact)

San Bruno Mountain, Sweeney Ridge, and Skyline College are identified as scenic vistas in the City's General Plan. Crystal Springs Road, El Camino Real (from Easton Drive to Crystal Springs Road), and Sharp Park Road are County- and locally-designated scenic roads, and Sneath Lane is a locally-designated scenic corridor. As documented in Section 4.1.1.2, all of the Housing Opportunity Sites (with the exception of Sites 3 and 6) are located within a transit priority area (TPA), and therefore impacts on scenic vistas associated with future residential and mixed-use residential development at these sites are considered less than significant pursuant to SB 743.

Due to distance and/or intervening development and topography, views of Sweeney Ridge and San Bruno Mountain from Sites 3 and 6 are limited. Pursuant to General Plan Policy LUD-7, any future

¹⁵ Public views are those that are experienced from publicly accessible vantage points.

residential projects proposed at Sites 3 and 6 would be subject to design review, where it would be reviewed to ensure consistency with General Plan and Municipal Code regulations governing scenic quality (refer to Section 4.1.1.1 and the discussion under Impact AES-3). Further, future development at Sites 3 and 6 would also be subject to the 50-foot height restrictions placed on new development by Ordinance 1284. Therefore, while the orientation and density of development at Sites 3 and 6 may change, views from San Bruno Mountain and Sweeney Ridge would be fundamentally unchanged in comparison with existing conditions.

For the reasons stated above, buildout of the Housing Element Update would not have a substantial adverse effect on a scenic vista.

Impact AES-2: The project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. **(Less than Significant Impact)**

There is one state-designated scenic highway in San Bruno (I-280). As noted under Impact AES-1, all of the Housing Opportunity Sites (with the exception of Sites 3 and 6) are located within a TPA, and therefore impacts to scenic resources within a state scenic highway associated with future residential and mixed-use residential development at these sites are considered less than significant pursuant to SB 743.

Views from I-280 of Sites 3 and 6 are extremely limited due to screening from intervening vegetation that borders I-280; Site 6 is further obscured due to its location uphill of I-280. The only scenic resources present at Sites 3 and 6 are trees, which, if removed, would be replaced in accordance with the requirements outlined in San Bruno Municipal Code sections 8.24.090 and 8.25.050 (refer to Section 4.4.1.1 Regulatory Framework).¹⁶ Since existing trees on Sites 3 and 6 do not contribute to views from I-280 redevelopment of these sites with residential uses would not damage scenic resources within a state scenic highway.

For the reasons stated above, buildout of the Housing Element Update would not damage scenic resources within a state scenic highway.

Impact AES-3: The project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. The project would not conflict with applicable zoning and other regulations governing scenic quality. **(Less than Significant Impact)**

As documented in Section 4.1.1.2, all of the Housing Opportunity Sites identified in the Housing Element Update are within urbanized areas, with the exception of Site 6 which is designated for housing under the current General Plan and Municipal Code regulations. As noted under Impact AES-1, all of the Housing Opportunity Sites (with the exception of Sites 3 and 6) are located within a TPA, and therefore impacts to visual character, public views, and scenic quality associated with

¹⁶ Street trees and heritage trees are required to be replaced by either two twenty-four-inch box size trees or one thirty-six-inch box size tree for each tree removed.

future residential and mixed-use residential development at these sites are considered less than significant pursuant to SB 743.

Redevelopment of Sites 3 and 6 would be subject to design review by General Plan Policy LUD-7, where it would be reviewed to ensure consistency with General Plan and Municipal Code regulations governing scenic quality. Applicable General Plan policies (refer to Section 4.1.1.1, above) would include LUD-E, LUD-3, LUD-4, LUD-8, LUD-12, LUD-21, LUD-25, LUD-33, LUD-44, LUD-70, LUD-72, LUD-73, T-18, T-25, T-26, T-28, T-30, T-32, T-33, T-42, T-76, T-77, T-78, OSR-33, OSR-34, ERC-9, ERC-10, ERC-12, ERC-40, PFS-24, and PFS-65. Future development at Sites 3 and 6 would also be subject to the Municipal Code regulations identified in Section 4.1.1.1, including the various design guidelines and tree preservation policies, and the 50-foot height restriction imposed by Ordinance 1284. Further, future development at Site 3 under the Housing Element Update would be required to adhere to the mandatory “Urban Design Policies” provided in the Bayhill Specific Plan. The design review process would ensure that future development at Site 3 would not conflict with the aforementioned zoning and other regulations governing scenic quality, and that future development at Site 6 does not degrade the existing visual character or quality of public views of Site 6 and its surroundings.

For the reasons stated above, buildout of the Housing Element Update would not conflict with applicable zoning and other regulations governing scenic quality, or degrade the existing visual character or quality of public views of the site and its surroundings.

Impact AES-4: The project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. **(Less than Significant Impact)**

As noted under Impact AES-1, all of the Housing Opportunity Sites (with the exception of Sites 3 and 6) are located within a TPA, and therefore light- and glare-related impacts associated with future residential and mixed-use residential development at these sites are considered less than significant pursuant to SB 743.

As discussed in Section 4.1.1.2, substantial light and glare exists at Housing Opportunity Site 3 and the surrounding area that is typical to urbanized areas. Less light and glare is present at Site 6, which is in the vicinity of residential uses and gas stations as well as undeveloped areas that do not generate any light or glare. Among other things, Site 6 is developed with approximately 60-foot-tall pole mounted lights that generate substantial light and glare post-sundown.

As discussed under Impact AES-3, all future development under the Housing Element Update would be subject to design review, where it would be reviewed to ensure consistency with General Plan and Municipal Code regulations governing scenic quality (including those related to light and glare). Applicable General Plan policies concerning light and glare include LUD-72, which requires buildings to screen rooftop mechanical equipment with non-glaring materials, and LUD-73, which requires buildings with a continuous façade of 100 feet or longer to use non-reflective materials to minimize adverse impact of glare. Redevelopment at Site 3 would be subject to the mandatory “Urban Design Policies” provided in the Bayhill Specific Plan governing light fixtures, including

Policies 3-17, 3-20, and 3-26, which require shielding light and glare from exterior site lighting, shielding internal building lighting, and minimizing the reflectivity of building wall surfaces and glazing, respectively. Further, redevelopment of Site 6 is anticipated to remove the pole mounted lights and potentially reduce post-sundown light and glare. Accordingly, future development at Sites 3 and 6 would not generate substantial glare that would adversely affect day or nighttime views in the area.

For the reasons stated above, buildout of the Housing Element Update would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

4.2 AGRICULTURE AND FORESTRY RESOURCES

4.2.1 Environmental Setting

4.2.1.1 *Regulatory Framework*

State

Farmland Mapping and Monitoring Program

The California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP) assesses the location, quality, and quantity of agricultural land and conversion of these lands over time. Agricultural land is rated according to soil quality and irrigation status. The best quality land is identified as Prime Farmland. In CEQA analyses, the FMMP classifications and published county maps are used, in part, to identify whether agricultural resources that could be affected are present on-site or in the project area.¹⁷

California Land Conservation Act

The California Land Conservation Act (Williamson Act) enables local governments to enter into contracts with private landowners to restrict parcels of land to agricultural or related open space uses. In return, landowners receive lower property tax assessments. In CEQA analyses, identification of properties that are under a Williamson Act contract is used to also identify sites that may contain agricultural resources or are zoned for agricultural uses.¹⁸

Fire and Resource Assessment Program

The California Department of Forestry and Fire Protection (CAL FIRE) identifies forest land, timberland, and lands zoned for timberland production that can (or do) support forestry resources.¹⁹ Programs such as CAL FIRE's Fire and Resource Assessment Program and are used to identify whether forest land, timberland, or timberland production areas that could be affected are located on or adjacent to a project site.^{20, 21}

¹⁷ California Department of Conservation. "Farmland Mapping and Monitoring Program." Accessed October 24, 2022. <http://www.conservation.ca.gov/dlrp/fmmp/Pages/Index.aspx>.

¹⁸ California Department of Conservation. "Williamson Act." Accessed October 24, 2022. <http://www.conservation.ca.gov/dlrp/lca>.

¹⁹ Forest Land is land that can support 10 percent native tree cover and allows for management of forest resources (California Public Resources Code Section 12220(g)); Timberland is land not owned by the federal government or designated as experimental forest land that is available for, and capable of, growing trees to produce lumber and other products, including Christmas trees (California Public Resources Code Section 4526); and Timberland Production is land used for growing and harvesting timber and compatible uses (Government Code Section 51104(g)).

²⁰ California Department of Forestry and Fire Protection. "Fire and Resource Assessment Program." Accessed October 24, 2022. <http://frap.fire.ca.gov/>.

²¹ City of San Bruno. *San Bruno General Plan*. March 2009.

4.2.1.2 *Existing Conditions*

There is no Prime, Unique, or Farmland of Statewide Importance or forest land (including timberland) within the City of San Bruno.²² As shown in Table 3.2-1, none of the Housing Opportunity Sites are zoned for agricultural or forestry (including timberland) use. All of the Housing Opportunity Sites are designated as “Urban and Built-Up Land” on the *San Mateo County Important Farmlands 2018 Map*. Common examples of “Urban and Built-Up Land” are residential, institutional, industrial, commercial, landfill, golf course, airports, and other utility uses. None of the Housing Opportunity Sites are under a Williamson Act contract and there are no existing agricultural or forestry resources on or in the vicinity of the sites.

4.2.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
1) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4) Result in a loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.2.2.1 *Agricultural and Forestry Analysis*

As documented in Section 4.2.1.2, there is no Prime, Unique, or Farmland of Statewide Importance or forest land (including timberland) within the City of San Bruno, and none of the Housing

²² California Department of Conservation. “Farmland Mapping and Monitoring Program.” Accessed October 24, 2022. <http://www.conservation.ca.gov/dlrp/fmmp/Pages/Index.aspx>.

Opportunity Sites are zoned for agricultural or forestry (including timberland) use. Therefore, the Housing Element Update as a whole would have no impact on agricultural or forestry resources.

4.3 AIR QUALITY

The following discussion is based, in part, on an Air Quality and Greenhouse Gas Assessment prepared for the Housing Element Update by Illingworth & Rodkin, Inc. A copy of this report, dated September 2022, is attached to this Initial Study as Appendix A.

4.3.1 Environmental Setting

4.3.1.1 *Background Information*

Criteria Pollutants

Air quality in the Bay Area is assessed related to six common air pollutants (referred to as criteria pollutants), including ground-level ozone (O₃), nitrogen oxides (NO_x), particulate matter (PM), carbon monoxide (CO), sulfur oxides (SO_x), and lead.²³ Criteria pollutants are regulated because they result in health effects. An overview of the sources of criteria pollutants and their associated health are summarized in Table 4.3-1. The most commonly regulated criteria pollutants in the Bay Area are discussed further below.

Table 4.3-1: Health Effects of Air Pollutants		
Pollutants	Sources	Primary Effects
Ozone (O ₃)	Atmospheric reaction of organic gases with nitrogen oxides in sunlight	<ul style="list-style-type: none"> • Aggravation of respiratory and cardiovascular diseases • Irritation of eyes • Cardiopulmonary function impairment
Nitrogen Dioxide (NO ₂)	Motor vehicle exhaust, high temperature stationary combustion, atmospheric reactions	<ul style="list-style-type: none"> • Aggravation of respiratory illness • Reduced visibility
Fine Particulate Matter (PM _{2.5}) and Coarse Particulate Matter (PM ₁₀)	Stationary combustion of solid fuels, construction activities, industrial processes, atmospheric chemical reactions	<ul style="list-style-type: none"> • Reduced lung function, especially in children • Aggravation of respiratory and cardiorespiratory diseases • Increased cough and chest discomfort • Reduced visibility
Toxic Air Contaminants (TACs)	Cars and trucks, especially diesel-fueled; industrial sources, such as chrome platers; dry cleaners and service stations; building materials and products	<ul style="list-style-type: none"> • Cancer • Chronic eye, lung, or skin irritation • Neurological and reproductive disorders

High O₃ levels are caused by the cumulative emissions of reactive organic gases (ROG) and NO_x. These precursor pollutants react under certain meteorological conditions to form high O₃ levels. Controlling the emissions of these precursor pollutants is the focus of the Bay Area's attempts to

²³ The area has attained both state and federal ambient air quality standards for CO. The project does not include substantial new emissions of sulfur dioxide or lead. These criteria pollutants are not discussed further.

reduce O₃ levels. The highest O₃ levels in the Bay Area occur in the eastern and southern inland valleys that are downwind of air pollutant sources.

PM is a problematic air pollutant of the Bay Area. PM is assessed and measured in terms of respirable particulate matter or particles that have a diameter of 10 micrometers or less (PM₁₀) and fine particulate matter where particles have a diameter of 2.5 micrometers or less (PM_{2.5}). Elevated concentrations of PM₁₀ and PM_{2.5} are the result of both region-wide emissions and localized emissions.

Toxic Air Contaminants

TACs are a broad class of compounds known to have adverse health effects. They include but are not limited to criteria pollutants. TACs are found in ambient air, especially in urban areas, and are caused by industry, agriculture, diesel fuel combustion, and commercial operations (e.g., dry cleaners). TACs are typically found in low concentrations, even near their source (e.g., diesel particulate matter [DPM] near a freeway).

Diesel exhaust is the predominant TAC in urban air and is estimated to represent about three-quarters of the cancer risk from TACs. Diesel exhaust is a complex mixture of gases, vapors, and fine particles. Medium- and heavy-duty diesel trucks represent the bulk of DPM emissions from California highways. The majority of DPM is small enough to be inhaled into the lungs. Most inhaled particles are subsequently exhaled, but some deposit on the lung surface or are deposited in the deepest regions of the lungs (most susceptible to injury).²⁴ Chemicals in diesel exhaust, such as benzene and formaldehyde, have been previously identified as TACs by the California Air Resources Board (CARB).

Sensitive Receptors

Some groups of people are more affected by air pollution than others. CARB has identified the following persons who are most likely to be affected by air pollution: children under 16, the elderly over 65, athletes, and people with cardiovascular and chronic respiratory diseases. These groups are classified as sensitive receptors. Locations that may contain a high concentration of these sensitive population groups include residential areas, hospitals, daycare facilities, elder care facilities, and elementary schools.

4.3.1.2 *Regulatory Framework*

Federal and State

Clean Air Act

At the federal level, the United States Environmental Protection Agency (EPA) is responsible for overseeing implementation of the Clean Air Act and its subsequent amendments. The federal Clean Air Act requires the EPA to set national ambient air quality standards for the six common criteria pollutants (discussed previously), including PM, O₃, CO, SO_x, NO_x, and lead.

²⁴ California Air Resources Board. "Overview: Diesel Exhaust and Health." Accessed October 24, 2022. <https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health>.

CARB is the state agency that regulates mobile sources throughout the state and oversees implementation of the state air quality laws and regulations, including the California Clean Air Act. The EPA and the CARB have adopted ambient air quality standards establishing permissible levels of these pollutants to protect public health and the climate. Violations of ambient air quality standards are based on air pollutant monitoring data and are determined for each air pollutant. Attainment status for a pollutant means that a given air district meets the standard set by the EPA and/or CARB.

Risk Reduction Plan

To address the issue of diesel emissions in the state, CARB developed the Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles. In addition to requiring more stringent emission standards for new on-road and off-road mobile sources and stationary diesel-fueled engines to reduce particulate matter emissions by 90 percent, the plan involves application of emission control strategies to existing diesel vehicles and equipment to reduce DPM (in addition to other pollutants). Implementation of this plan, in conjunction with stringent federal and CARB-adopted emission limits for diesel fueled vehicles and equipment (including off-road equipment), will significantly reduce emissions of DPM and NO_x.

Regional

2017 Clean Air Plan

The Bay Area Air Quality Management District (BAAQMD) is the agency primarily responsible for assuring that the federal and state ambient air quality standards are maintained in the San Francisco Bay Area. Regional air quality management districts, such as BAAQMD, must prepare air quality plans specifying how state and federal air quality standards will be met. BAAQMD's most recently adopted plan is the Bay Area 2017 Clean Air Plan (2017 CAP). The 2017 CAP focuses on two related BAAQMD goals: protecting public health and protecting the climate. To protect public health, the 2017 CAP describes how BAAQMD will continue its progress toward attaining state and federal air quality standards and eliminating health risk disparities from exposure to air pollution among Bay Area communities. To protect the climate, the 2017 CAP includes control measures designed to reduce emissions of greenhouse gases (GHGs) that are potent climate pollutants in the near term, and to decrease emissions of carbon dioxide by reducing fossil fuel combustion.²⁵

CEQA Air Quality Guidelines

The BAAQMD CEQA Air Quality Guidelines are intended to serve as a guide for those who prepare or evaluate air quality impact analyses for projects and plans in the San Francisco Bay Area. Jurisdictions in the San Francisco Bay Area Air Basin utilize the thresholds and methodology for assessing air quality impacts developed by BAAQMD within their CEQA Air Quality Guidelines. The guidelines include information on legal requirements, BAAQMD rules, methods of analyzing impacts, and recommended mitigation measures.

²⁵ BAAQMD. *Final 2017 Clean Air Plan*. [April 20, 2017](#).

Local

City of San Bruno General Plan

Various policies in the City’s General Plan have been adopted for the purpose of avoiding or mitigating air quality impacts resulting from planned development within the City, including the following:

Policies	Description
ERC-E	Contribute to regional attainment by improving ambient air quality levels within San Bruno.
ERC-13	Through environmental review, assure that all projects affecting resources of regional concern (e.g., the San Francisco garter snake habitat, water and air quality, the San Francisco Fish and Game Reserve) satisfy regional, State and federal laws.
ERC-25	Maintain and improve air quality by requiring project mitigation, such as Transportation Demand Management (TDM) techniques, where air quality impacts are unavoidable.
ERC-26	Require dust abatement actions for all new construction and redevelopment projects.
ERC-28	Incorporate air quality beneficial programs and policies into local planning and development activities, with a particular focus on subdivision, zoning, and site design measures that reduce the number and length of single-occupant automobile trips.
ERC-29	Promote demonstration projects to develop new strategies to reduce motor vehicle emissions. Projects may include low emission vehicle fleets and LEV refueling infrastructure.
ERC-30	Encourage new residential developments to incorporate measures such as shuttle services to major employment centers, commercial areas and transit areas, and provision of adequate transit facilities.
ERC-31	<p>Prepare a Greenhouse Gas Emissions Reduction Plan, focusing on feasible actions the City can take to minimize the adverse impacts of Plan implementation on climate change and air quality. The Plan will include but will not be limited to:</p> <ul style="list-style-type: none"> • An inventory of all known, or reasonably discoverable, sources of greenhouse gases (GHGs) that currently exist in the City and sources that existed in 1990. In determining what is a source of GHG emissions, the City may rely on the definition of “greenhouse gas emissions source” or “source” as defined in section 38505 of the California Global Warming Solutions Act (“AB 32”) or its governing regulations. The inventory may include estimates of emissions drawing on available information from State and regional air quality boards, supplemented by information obtained by the City. • A projected inventory of the new GHGs that can reasonably be expected to be emitted in the year 2025 due to the City’s discretionary land use decisions pursuant to the 2025 General Plan Update, as well as new GHGs emitted by the City’s internal government operations. The projected inventories will include estimates, supported by substantial evidence, of future emissions from planned land use and information from state and regional air quality boards and agencies. • A target for the reduction of those sources of future emissions reasonably attributable to the City’s discretionary land use decisions under the 2025 General Plan and the City’s internal government operations, and feasible GHG emission reduction measures whose purpose shall be to meet this reduction target by regulating those

Policies	Description
	sources of GHG emissions reasonably attributable to the City’s discretionary land use decisions and the City’s internal government operations.
ERC-32	Coordinate air quality planning efforts with local, regional, and State agencies. Support the Bay Area Air Quality Management District’s efforts to monitor and control air pollutants from stationary sources.
ERC-33	Require all large construction projects to mitigate diesel exhaust emissions through use of alternate fuels and control devices.
ERC-34	Require that adequate buffer distances be provided between odor sources and sensitive receptors, such as schools, hospitals, and community centers.
LUD-22	Ensure that vehicular, transit, bicycle, and pedestrian access to the city’s regional retail centers is convenient, efficient, and safe. Coordinate transportation improvements with the new San Bruno BART station and SamTrans.
LUD-26	During the Zoning Ordinance Update, create a transit-oriented zoning district surrounding the BART and Caltrain stations, and along the El Camino Real and San Bruno Avenue transit corridor. Within the district, reduce building setbacks, increase development intensities, require pedestrian connections, reduce parking requirements, and consider establishment of minimum development intensities.
PFS-60	<p>Develop and implement a Green Building Design Ordinance and design guidelines for climate- oriented site planning, building design, and landscape design to promote energy efficiency. These standards may include, but are not limited to, the following:</p> <ul style="list-style-type: none"> • Require the use of Energy Star® appliances and equipment in new residential and commercial development, and new City facilities; • Require all new City facilities and new residential development to incorporate green building methods meeting the equivalent of LEED Certified “Silver” rating or better; and • Require all new residential development to be pre-wired for optional photovoltaic roof energy systems and/or solar water heating. <p>The Ordinance will allow variances to site or building requirements—building setbacks, lot coverage, and building height—that will enable use of alternative energy sources, such as passive heating and/or cooling.</p>
PFS-61	Require that all new development complies with California’s Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24, Part 6).
PFS-62	Provide incentives for retrofitting existing homes and businesses for improved energy efficiency, such as passive solar and/or cooling devices.
PFS-63	<p>Require new development to incorporate passive heating and natural lighting strategies if feasible and practical. These strategies should include, but are not limited to, the following:</p> <ul style="list-style-type: none"> • Using building orientation, mass and form, including façade, roof, and choice of building materials, color, type of glazing, and insulation to minimize heat loss during winter months and heat gain during the summer months; • Designing building openings to regulate internal climate and maximize natural lighting, while keeping glare to a minimum; and • Reducing heat-island effect of large concrete roofs and parking surfaces.

Policies	Description
PFS-64	Enforce landscape requirements that facilitate efficient energy use or conservation, such as drought-resistant landscaping and/or deciduous trees along southern exposures.
PFS-65	Require developers and builders to distribute information regarding energy efficiency (such as the Home Energy Guide available from the California Energy Commission) to all new homeowners.
PFS-66	Initiate a marketing campaign where energy efficiency information is distributed to all City employees and residents. Provide information on how, what type, and where to plant trees to reduce energy demand. Make such information available at all public locations such as City Hall and the Public Library.
PFS-67	Offer incentives (such as expedited permit processing, density bonuses, site variances) to support implementation of photovoltaic and other renewable energy technologies that provide a portion of the City's energy needs, or for projects that result in energy savings of at least 20-percent when compared to the energy consumption that would occur under similar projects built to meet the minimum standards of the energy code.
PFS-68	Facilitate environmentally sensitive construction practices by: <ul style="list-style-type: none"> • Restricting use of chlorofluorocarbons (CFCs), hydrochlorofluorocarbons (HCFCs) and halons in mechanical equipment and building materials; • Promoting use of products that are durable and allow efficient end-of-life disposal (e.g. reusable, recyclable, biodegradable); • Promoting the purchase of locally or regionally available materials; and • Promoting the use of cost-effective design and construction strategies that reduce resource and environmental impacts.
T-1	Develop incentives for San Bruno government and private employers to institute staggered working hours, compressed work week, homebased telecommuting, carpooling, use of transit, alternative fuel vehicles, and bicycling to employment centers to reduce vehicle miles traveled and the associated traffic congestion and air pollution.
T-3	Encourage provision of bicycle facilities such as weather protected bicycle parking, direct and safe access for pedestrians and bicyclists to adjacent bicycle routes and transit stations, showers, and lockers for employees at the worksite, secure short-term parking for bicycle.
T-4	Encourage major employers of the city to provide shuttle service for employees from worksite to food service establishments, commercial areas, and transit stations, to reduce the number of automobile trips.
T-5	Provide assistance to regional and local ridesharing organizations; advocate legislation to maintain and expand incentives (e.g., tax deductions/credits).
T-20	Study the potential benefit of implementing High Occupancy Vehicle (HOV) and carpool lane along major arterials.
T-40	Consider reduced parking standards within transit corridors and station areas in recognition of their proximity to high frequency transit service, mix of land uses, and walkable environment.
T-42	Do not allow parking lots to dominate the frontage of mixed-use streets, interrupt pedestrian routes, or negatively impact surrounding neighborhoods.

Policies	Description
T-48	Incorporate a dedicated pedestrian crossing and flashing street markers at the new four-way signal installed on El Camino Real connecting The Crossing with The Shops at Tanforan and the San Bruno BART station.
T-50	Consider developing a shuttle service to provide reliable, consistent, and convenient access between the BART and Caltrain stations and other destinations within the city, including Bayhill Office Park, Skyline College, Downtown, schools and neighborhoods in the western and southern portions of the city.
T-53	Coordinate with the Peninsula Corridor Joint Powers Board to ensure design of the planned San Bruno Avenue Caltrain Station (and Grade Separation Project) that will accommodate such regional transit improvements.
T-57	Work with SamTrans to schedule the routing of public transit in San Bruno so that a majority of residents are within walking distance of transit stops.
T-59	Encourage SamTrans to configure bus transit service to serve connections with other transit systems (BART, Caltrain, SFO, and other bus lines).
T-62	Seek community input in establishing transit routes and schedules.
T-64	Work with SamTrans to plan the local system with built-in flexibility for increases in service in accordance with increases in demand. Coordinate with local school districts on possible joint transit usage.
T-66	Design arterial and collector streets to facilitate safe pedestrian crossings to transit stops. Provide crosswalks at all signalized arterial intersections.
T-69	Continue to work toward dedication and/or installation of bicycle lanes throughout the city in accordance with Figure 4-4, to enhance recreational opportunities and make bicycling a more viable transportation alternative. Implement bicycle route improvements including signing, striping, paving, and provision of bicycle facilities at employment sites, shopping centers, schools, and public facilities.
T-71	Provide bicycle parking facilities in Downtown, Bayhill Office Park, BART and Caltrain Stations, The Shops at Tanforan and Towne Center, parks, schools, and other key destinations. Review bicycle standards as part of the Zoning Ordinance Update.
T-72	Identify and mark safe bicycle routes providing connections between the BART and Caltrain stations, and the following regional trail networks: <ul style="list-style-type: none"> • Bay Ridge Trail • Sweeney Ridge Trail • Bay Trail • San Andreas Trail • Sawyer Camp Trail
T-73	Coordinate with the Bicycle and Pedestrian Committee to promote safe cycling programs, sponsored rides, and other community outreach programs geared toward cyclists.
T-75	Link sidewalks directly to building entrances. Avoid routes through parking lots or at the rear of residential developments.
T-77	T-77 Create a pedestrian-oriented setting along the Pedestrian Emphasis Zones (refer to Figure 4-6 in the San Bruno General Plan) through potential construction of the following public improvements:

Policies	Description
	<ul style="list-style-type: none"> • Brick pavers to make sidewalks look more distinct; • Street trees to soften the environment and provide color and shade; • Human-scale street lights for enhanced aesthetics and illumination; • Banners and flags to make the area look more festive and cheerful; and • Benches to give people a place to sit, rest, and watch what goes on around them.
T-78	Allow new development to contribute to the Pedestrian Emphasis Zones (refer to Figure 4-6 in the San Bruno General Plan) through construction of off-site improvements.
T-79	Prioritize improvements to sidewalks and other walking paths adjacent to public school facilities where children and youth are likely to use them on a daily basis.
T-80	Install safety improvements for pedestrian crossings along El Camino Real. Such improvements may include bulb-outs at the corners, crossing medians, and signal synchronization.

Transit Corridors Plan

As noted in Section 3.1.1.1, Housing Opportunity Sites 1, 2, 4, 5, 7, 9, 11, 12, 15, 17, 20, 21, 22, and 23 are located within the TCP area. Chapter Seven of the TCP includes the following policies designed to reduce emissions associated with vehicle traffic.

Policies	Description
Trans-F	Develop and implement a Transportation Demand Management (TDM) Program that reduces the amount of peak period motor vehicle traffic and encourages the use of modes other than the single-occupant vehicle.
Trans B-1	Provide a local circulator shuttle service between the Downtown, BART station, and Caltrain station, with potential stops at the San Francisco International Airport
Trans C-2	Provide a network of bicycle priority streets that provide linkages throughout the Plan area. As appropriate, bicycle priority streets should provide traffic-calming measures to limit vehicle travel and speeds.
Trans C-4	Implement a citywide bicycle parking ordinance that specifies bicycle parking, locker, and shower requirements.

Bayhill Specific Plan

As noted in Section 3.1.1.1, Housing Opportunity Sites 3 and 13 are located within the Bayhill Specific Plan area. Chapter Six of the Bayhill Specific Plan includes mandatory “Environmental Quality Policies”, including the following which pertain to air quality.

Policy 6-9

Policy 6-9 requires projects during construction to use tier 4 equipment on off-road equipment meeting certain parameters, diesel trucks model 2010 or later, renewable diesel, low volatile organic compounds (VOC) coatings, portable electrical equipment given certain conditions are met, and implementation of fugitive dust best management practices.

Policy 6-10

Policy 6-10 requires projects that exceed BAAQMD criteria air pollutant emissions screening criteria and thresholds of significance to pay for criteria air pollutant emission offsets.

Policy 6-11

Policy 6-11 requires residential and childcare projects to install high-efficiency filters and mitigate health risk impacts to the extent feasible.

Policy 6-13

Policy 6-13 requires projects to reduce air pollutant emissions generated during operation of future developments to be mitigated through the use of best practices, such as using low-emission generators, develop and adhere to loading plans that minimized truck idling, use green commercial products, and use all-electric landscaping equipment when feasible.

4.3.1.3 Existing Conditions

The Bay Area is considered a non-attainment area for ground-level O₃ and PM_{2.5} under both the federal Clean Air Act and state Clean Air Act. The area is also considered nonattainment for PM₁₀ under the state act, but not the federal act. The area has attained both state and federal ambient air quality standards for CO. As part of an effort to attain and maintain ambient air quality standards for O₃ and PM₁₀, BAAQMD has established thresholds of significance for these air pollutants and their precursors. These thresholds are for O₃ precursor pollutants (ROG and NO_x), PM₁₀, and PM_{2.5}, and apply to both construction period and operational period impacts.

4.3.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
1) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

4.3.2.1 Thresholds of Significance

Plan-level impacts to air quality associated with buildout of the General Plan, TCP, and Bayhill Specific Plan were previously evaluated in their respective EIRs. However, since air quality impacts

are not localized, it is necessary to evaluate the cumulative air quality impacts of the Housing Element as a whole. Accordingly, the discussion under Impact AIR-1 evaluates whether the Housing Element would conflict with the control strategy measures provided in the applicable air quality plan (the 2017 Clean Air Plan – refer to Section 4.3.1.1). Further, no individual project is sufficient in size to, by itself, result in the non-attainment of ambient air quality standards, and criteria air pollutant emissions contribute to regional emissions of such pollutants. Therefore, impacts associated with criteria air pollutant emissions are, by their nature, cumulative and must be evaluated accordingly. For this reason, the discussion presented under Impact AIR-2 below evaluates whether buildout of all Housing Opportunity Sites at the densities assumed by the Housing Element Update would result in a cumulatively considerable net increase of ROG, NO_x, PM₁₀, and PM_{2.5} emissions using the plan-level thresholds provided in the BAAQMD CEQA Air Quality Guidelines. Additionally, consistent with the plan-level thresholds provided in the BAAQMD CEQA Air Quality Guidelines (refer to Section 4.3.1.1), this Initial Study evaluates whether the Housing Element as a whole would expose sensitive receptors to substantial pollutant concentrations (see Impact AIR-3) or result in odors that would adversely affect a substantial number of people. The BAAQMD plan-level thresholds are shown below in Table 4.3-2.

Table 4.3-2: BAAQMD Plan-Level Air Quality Significance Thresholds¹	
Impact	Threshold of Significance
Criteria Air Pollutant and Precursor Emissions	1. Consistency with Current Air Quality Plan control measures 2. Projected vehicle miles traveled (VMT) or vehicle trip increase is less than or equal to projected population increase
Health Risks	Land use diagram identifies special overlay zones around existing and planned sources of TACs and PM _{2.5} , including special overlay zones of at least 500 feet (or Air District-approved modeled distance) on each side of all freeways and high-volume roadways, and plan identifies goals, policies, and objectives to minimize potentially adverse impacts. For this analysis – overlay zones are based on potential for sources to result in the following impacts: 1. Excess cancer risk >10.0 chances per million 2. Annual PM _{2.5} Concentration > 0.3 µg/m ³ 3. Hazard Index >1.0
Odors	Identify the location, and include policies to reduce the impacts, of existing or planned sources of odors
¹ Bay Area Air Quality Management District. <i>California Environmental Quality Act Air Quality Guidelines</i> . May 2017.	

For informational purposes only, the BAAQMD project-level thresholds that would be applied to future individual projects are shown in Table 4.3-3.

Table 4.3-3: BAAQMD Project-Level Air Quality Significance Thresholds¹			
Pollutant	Construction Thresholds	Operation Thresholds	
	Average Daily Emissions (pounds/day)	Annual Daily Emissions (pounds/year)	Annual Average Emissions (tons/year)
Criteria Air Pollutants			
ROG, NO _x	54	54	10
PM ₁₀	82 (exhaust)	82	15
PM _{2.5}	54 (exhaust)	54	10

Table 4.3-3: BAAQMD Project-Level Air Quality Significance Thresholds ¹			
Pollutant	Construction Thresholds	Operation Thresholds	
	Average Daily Emissions (pounds/day)	Annual Daily Emissions (pounds/year)	Annual Average Emissions (tons/year)
CO	Not Applicable	9.0 ppm (eight-hour) or 20.0 ppm (one-hour)	
Fugitive Dust	Dust Control Measures/Best Management Practices	Not Applicable	
Health Risks and Hazards for New Sources (within a 1,000-foot Zone of Influence)			
Health Hazard	Single Source	Combined Cumulative Sources	
Excess Cancer Risk	10 per one million	100 per one million	
Hazard Index	1.0	10.0	
Incremental Annual PM _{2.5}	0.3 µg/m ³	0.8 µg/m ³ (average)	
¹ Bay Area Air Quality Management District. <i>California Environmental Quality Act Air Quality Guidelines</i> . May 2017.			

Impact AIR-1: The project would not conflict with or obstruct implementation of the applicable air quality plan. **(Less than Significant Impact)**

As discussed in Section 4.3.1.1, the applicable air quality plan is the 2017 CAP. A project is considered consistent with the 2017 CAP if, a) the plan supports the primary goals of the 2017 CAP; b) includes relevant control measures; and c) does not interfere with implementation of 2017 CAP control measures.²⁶

The goals of the 2017 CAP are to 1) protect public health by progressing towards the attainment of air quality standards and eliminating health risks, and 2) protect the climate. As discussed under Impact AIR-2, the Housing Element, when considered at a program or plan level, would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment. As discussed under Impact AIR-3, the project would not expose sensitive receptors to substantial pollutant concentrations. As discussed in Section 4.8 Greenhouse Gas Emissions under Impact GHG-1 and Impact GHG-2, the project would not generate GHG emissions that would have a significant impact on the environment, nor would it conflict with any plan, policy, or regulation adopted for the purpose of reducing GHGs. Therefore, the project would support the primary goals of the 2017 CAP. Additionally, General Plan policies (refer to Section 4.3.1.2 and the consistency analysis in Table 4.3-4) and mitigation measures MM AIR-3.1, MM AIR-3.2, MM GHG-1.1, and MM GHG-1.2 would require future residential development under the Housing Element Update to implement relevant control measures for controlling criteria air pollutant and GHG emissions and to

²⁶ Bay Area Air Quality Management District. *California Environmental Quality Act Air Quality Guidelines*. May 2017.

ensure that sensitive receptors are not exposed to substantial pollutant concentrations. Therefore, the project includes relevant control measures. Further, as documented in Table 4.3-4, the project is consistent with all of the control measures provided in the 2017 CAP.

Table 4.3-4: 2017 Clean Air Plan Control Measures Consistency Analysis	
Applicable Control Strategy Measure	Consistency Analysis
<i>Transportation Control Measures</i>	
TR1: Clean Air Teleworking Initiative: Develop teleworking best practices for employers and develop additional strategies to promote telecommuting. Promote teleworking on Spare the Air Days.	Implementation of the Housing Element Update would not inhibit teleworking. Future residents would benefit from incentives for public and private employers to offer telecommuting opportunities provided under General Plan Policy T-1 (refer to Section 4.3.1.2). (Consistent)
TR2: Trip Reduction Programs: Implement the regional Commuter Benefits Program (rule 14-1) that requires employers with 50 or more Bay Area employees to provide commuter benefits. Encourage trip reduction policies and programs in local plans, e.g., general and specific plans while providing grants to support trip reduction efforts. encourage local governments to require mitigation of vehicle travel as part of new development approval, to adopt transit benefits ordinances in order to reduce transit costs to employees, and to develop innovative ways to encourage rideshare, transit, cycling, and walking for work trips. Fund various employer-based trip reduction programs.	Implementation of the Housing Element would not result in employment generating uses or conflict with the Commute Benefits Program. General Plan policies T-1, T-3, T-4, T-5, T-20, T-57, and T-69 (refer to Section 4.3.1.2) encourage trip reduction policies and programs. (Consistent)
TR 5: Transit Efficiency and Use: Improve transit efficiency and make transit more convenient for riders through continued operation of 511 Transit, full implementation of Clipper® fare payment system and the Transit Hub Signage Program.	Control measure TR-5 is a regionally implemented measure, and General Plan policies T-1, T-4, T-50, T-53, T-57, T-59, T-62, and T-64 (refer to Section 4.3.1.2) support transit efficiency and use. Pursuant to the discussion in Section 4.17 Transportation under Impact TRN-1, the project would not conflict with any program, plan, ordinance, or policy addressing transit facilities. (Consistent)
TR7: Safe Routes to Schools and Safe Routes to Transit: Provide funds for the regional Safe Routes to School and Safe Routes to Transit Programs.	Implementation of the Housing Element would not conflict with the Safe Routes to School or Transit Programs, and General Plan policies T-21, T-42, T-48, T-57, T-64, T-66, T-69, T-78,

Table 4.3-4: 2017 Clean Air Plan Control Measures Consistency Analysis	
Applicable Control Strategy Measure	Consistency Analysis
	and T-79 (refer to Section 4.3.1.2) support these programs. Pursuant to the discussion in Section 4.17 Transportation under Impact TRN-1, the project would not conflict with any program, plan, ordinance, or policy addressing transit facilities. (Consistent)
TR8: Ridesharing, Last-Mile Connection: Promote carpooling and vanpooling by providing funding to continue regional and local ridesharing programs, and support the expansion of carsharing programs. Provide incentive funding for pilot projects to evaluate the feasibility and cost-effectiveness of innovative ridesharing and other last-mile solution trip reduction strategies. Encourage employers to promote ridesharing and carsharing to their employees.	Implementation of the Housing Element would not result in employment generating uses, and General Plan policies T-1, T-4, T-5, T-20, T-50, T-57, T-62, and T-64 (refer to Section 4.3.1.2) would support ridesharing and improve first- and last-mile connections. (Consistent)
TR9: Bicycle and Pedestrian Access and Facilities: Encourage planning for bicycle and pedestrian facilities in local plans, e.g., general and specific plans, fund bike lanes, routes, paths and bicycle parking facilities.	Pursuant to the discussion in Section 4.17.1 Transportation under Impact TRN-1, implementation of the Housing Element Update would not conflict with any program, plan, ordinance, or policy addressing bicycle or pedestrian facilities. Further, General Plan policies T-3, T-69, T-71, T-72, T-73, T-75, T-77, T-78, and T-80 (refer to Section 4.3.1.2) support the creation and maintenance of new and existing bicycle and pedestrian facilities. (Consistent)
TR10: Land Use Strategies: Support implementation of Plan Bay Area, maintain and disseminate information on current climate action plans and other local best practices, and collaborate with regional partners to identify innovative funding mechanisms to help local governments address air quality and climate change in their general plans.	As discussed in Section 4.11 Land Use and Planning and Section 4.14 Population and Housing, the Housing Element Update addresses the City's regional housing needs allocation upon which Plan Bay Area 2050 is based; therefore, the project directly supports implementation of Plan Bay Area 2050. Further, General Plan policies LUD-9, LUD-22, LUD-23, LUD-26, T-81, and T-83 (refer to Section 4.3.1.2) further support implementation of Plan Bay Area 2050. (Consistent)

Table 4.3-4: 2017 Clean Air Plan Control Measures Consistency Analysis	
Applicable Control Strategy Measure	Consistency Analysis
<p>TR13: Parking Policies:</p> <p>Encourage parking policies and programs in local plans, e.g., reduce minimum parking requirements; limit the supply of off-street parking in transit-oriented areas; unbundle the price of parking spaces; support implementation of demand-based pricing (such as “SF Park”) in high-traffic areas.</p>	<p>The Housing Element Update does not include any parking policies or programs that would conflict with Measure TR13. Further, General Plan policies LUD-8, LUD-19, T-23, T-34, T-38, and T-40 (refer to Section 4.3.1.2) support parking policies that encourage use of alternative modes of transportation.</p> <p>(Consistent)</p>
<i>Building Control Measures</i>	
<p>BL1: Green Buildings:</p> <p>Collaborate with partners such as KyotoUSA to identify energy-related improvements and opportunities for onsite renewable energy systems in school districts; investigate funding strategies to implement upgrades. Identify barriers to effective local implementation of the CALGreen (Title 24) statewide building energy code; develop solutions to improve implementation/enforcement. Work with ABAG’s BayREN program to make additional funding available for energy-related projects in the buildings sector. Engage with additional partners to target reducing emissions from specific types of buildings.</p>	<p>As discussed in Section 4.6 Energy, the Housing Element Update would not result in wasteful, inefficient, or unnecessary consumption of energy resources, or conflict with or obstruct any renewable energy or energy efficiency plans. Proposed Housing Element Program 7-A would adopt a local ordinance which requires more stringent building standards and Electric Vehicle (EV) parking spaces than those imposed at the state level through Title 24 of the California Energy Code. Future development under the Housing Element would be constructed at minimum in accordance with Title 24 requirements. Further, General Plan policies PFS-62, PFS-63, and PFS 64 (refer to Section 4.3.1.2) support the construction of green buildings.</p> <p>(Consistent)</p>
<p>BL2: Decarbonize Buildings:</p> <p>Explore potential Air District rulemaking options regarding the sale of fossil fuel-based space and water heating systems for both residential and commercial use. Explore incentives for property owners to replace their furnace, water heater or natural-gas powered appliances with zero-carbon alternatives. Update Air District guidance documents to recommend that commercial and multi-family developments install ground source heat pumps and solar hot water heaters.</p>	<p>As discussed in Section 4.8 Greenhouse Gas Emission under Impact GHG-2, future residential development under the Housing Element Update would be required to be fully electric. Further, General Plan policies PFS-64, PFS-68, and PFS-69 (refer to Section 4.3.1.2) support building and landscaping decarbonization. Accordingly, implementation of the Housing Element Update would support the decarbonization of buildings. (Consistent)</p>
<p>BL4: Urban Heat Island Mitigation:</p> <p>Develop and urge adoption of a model ordinance for “cool parking” that promotes</p>	<p>Implementation of the Housing Element Update is anticipated to replace existing non-residential uses with substantial amounts of</p>

Table 4.3-4: 2017 Clean Air Plan Control Measures Consistency Analysis	
Applicable Control Strategy Measure	Consistency Analysis
the use of cool surface treatments for new parking facilities, as well existing surface lots undergoing resurfacing. Develop and promote adoption of model building code requirements for new construction or re-roofing/roofing upgrades for commercial and residential multi-family housing. Collaborate with expert partners to perform outreach to cities and counties to make them aware of cool roofing and cool paving techniques, and of new tools available.	surface parking in favor of underground or podium garages; therefore, the Housing Element Update is anticipated to reduce the urban heat island effect. Further, General Plan policies PFS-65, PFS-66, and T-40 (refer to Section 4.3.1.2) would support the reduction of urban heat island effects through building and landscaping design. (Consistent)
<i>Natural and Working Lands Measures</i>	
NW2: Urban Tree Planting: Develop or identify an existing model municipal tree planting ordinance and encourage local governments to adopt such an ordinance. Include tree planting recommendations the Air District's technical guidance, best practices for local plans and CEQA review.	As discussed in Section 4.4 Biological Resources under Impact BIO-5, future development under the Housing Element Update would be required to obtain Heritage Tree and Street Tree removal permits as required by the City's Municipal Code, and conform with the replacement requirements outlined in San Bruno Municipal Code sections 8.24.090 and 8.25.050. Further, General Plan policies PFS-66 and PFS-68 (refer to Section 4.3.1.2) support urban tree planting. (Consistent)
<i>Waste Management Measures</i>	
WA4: Recycling and Waste Reduction: Develop or identify and promote model ordinances on community-wide zero waste goals and recycling of construction and demolition materials in commercial and public construction projects.	Future construction under the Housing Element Update would be required by Assembly Bill 939 to divert 75 percent of solid waste generated. Further, General Plan policies ERC-19, ERC-20, PFS-22, PFS-23, PFS-24, and PFS-25 (refer to Section 4.3.1.2) support Measure WA4. (Consistent)
<i>Water Measures</i>	
WR2: Support Water Conservation: Develop a list of best practices that reduce water consumption and increase on-site water recycling in new and existing buildings; incorporate into local planning guidance.	As discussed in Section 4.19 Utilities under Impact UTL-2, sufficient water supplies are available to serve future development under the Housing Element Update. Further, General Plan policies ERC-24, PFS-12, PFS-13, PFS-14, PFS-18, and PFS-19 (refer to Section 4.3.1.2) support water conservation. (Consistent)

For the reasons outlined above, the Housing Element Update would not conflict with or obstruct implementation of the applicable air quality plan.

Impact AIR-2: The project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. **(Less than Significant Impact)**

As discussed in Section 4.3.1.3, the Bay Area is considered a non-attainment area for ground-level ozone and PM_{2.5} under both the Federal Clean Air Act and the California Clean Air Act. The area is also considered non-attainment for PM₁₀ under the California Clean Air Act, but not the federal act. The area has attained both state and federal ambient air quality standards for carbon monoxide. As part of an effort to attain and maintain ambient air quality standards for ozone and particulate matter (i.e., PM_{2.5} and PM₁₀), BAAQMD has established plan- and project-level thresholds of significance for these air pollutants and their precursors. These thresholds are for ozone precursor pollutants (ROG and NO_x), PM₁₀, and PM_{2.5} and apply to both construction period and operational period impacts for projects.

Pursuant to the plan-level thresholds of significance for criteria air pollutant emissions and their precursors shown in Table 4.3-2, plans that are 1) inconsistent with the control measures provided in the 2017 CAP, or 2) would increase VMT at a rate that would exceed the rate of population increase, are considered to have a significant and unavoidable criteria air pollutant emissions impact. As documented under Impact AIR-1, the Housing Element Update would be consistent with the 2017 CAP. Further, as shown in Table 4.3-5, buildout of the Housing Element would increase VMT by 16.1 percent (and reduce VMT by .07 per capita) and increase population by 16.8 percent (and increase the population by 7,150 residents), and therefore the increase in VMT would not exceed the increase in population as a result of the project.^{[27][28]}

Table 4.3-5: VMT and Population Comparison

Scenario (Year)	Population ¹	Daily Trips ²	Daily VMT ²	VMT per capita ²
Existing Conditions (2022)	42,656	--	516,991	12.12
Existing plus Housing Element Update (2031)	49,806	14,451	600,421	12.05

²⁷ The Housing Element results in 9,552 residents when considering approved pipeline units and ADUs, however the VMT and population comparison considers the 23 Housing Opportunity Sites, and does not factor in pipeline units, since these have already undergone project-level analysis of their criteria air pollutant emissions in comparison with project- and cumulative-level thresholds, or ADUs since their future location is not reasonably foreseeable and as such the VMT associated with these units cannot be estimated.

²⁸ After completion of the analysis presented in this Initial Study, the number of units assumed at Sites 8 and 21 increased by one unit each, the number of units assumed at Site 22 decreased by one unit, and the number of pipeline units decreased by one unit, resulting in a net increase of one unit and two residents assumed at the Housing Opportunity Sites (2,708 units versus 2,709 units, 7,150 residents versus 7,152 residents) and no increase in the total number of units and residents assumed for the Housing Element Update as a whole (3,618 units and 9,552 residents total). This change would not affect any of the conclusions presented herein this Initial Study.

Net Change	+7,150 ³	+14,451	+83,430	-0.07
<p>Source: Illingworth & Rodkin, Inc. <i>San Bruno 2023-2031 Housing Element Update Air Quality & Greenhouse Gas Assessment</i>. September 14, 2022.</p> <p>Notes:</p> <p>¹ Refer to Section 4.14 of this Initial Study.</p> <p>² Source: Hexagon Transportation Consultants, Inc. Refer to Section 4.17 of this Initial Study.</p> <p>³ After completion of the analysis presented in this Initial Study, the number of units assumed at Sites 8 and 21 increased by one unit each, the number of units assumed at Site 22 decreased by one unit, and the number of pipeline units decreased by one unit, resulting in a net increase of one unit and two residents assumed at the Housing Opportunity Sites (2,708 units versus 2,709 units, 7,150 residents versus 7,152 residents) and no increase in the total number of units and residents assumed for the Housing Element Update as a whole (3,618 units and 9,552 residents total). This change would not affect any of the conclusions presented herein this Initial Study.</p>				

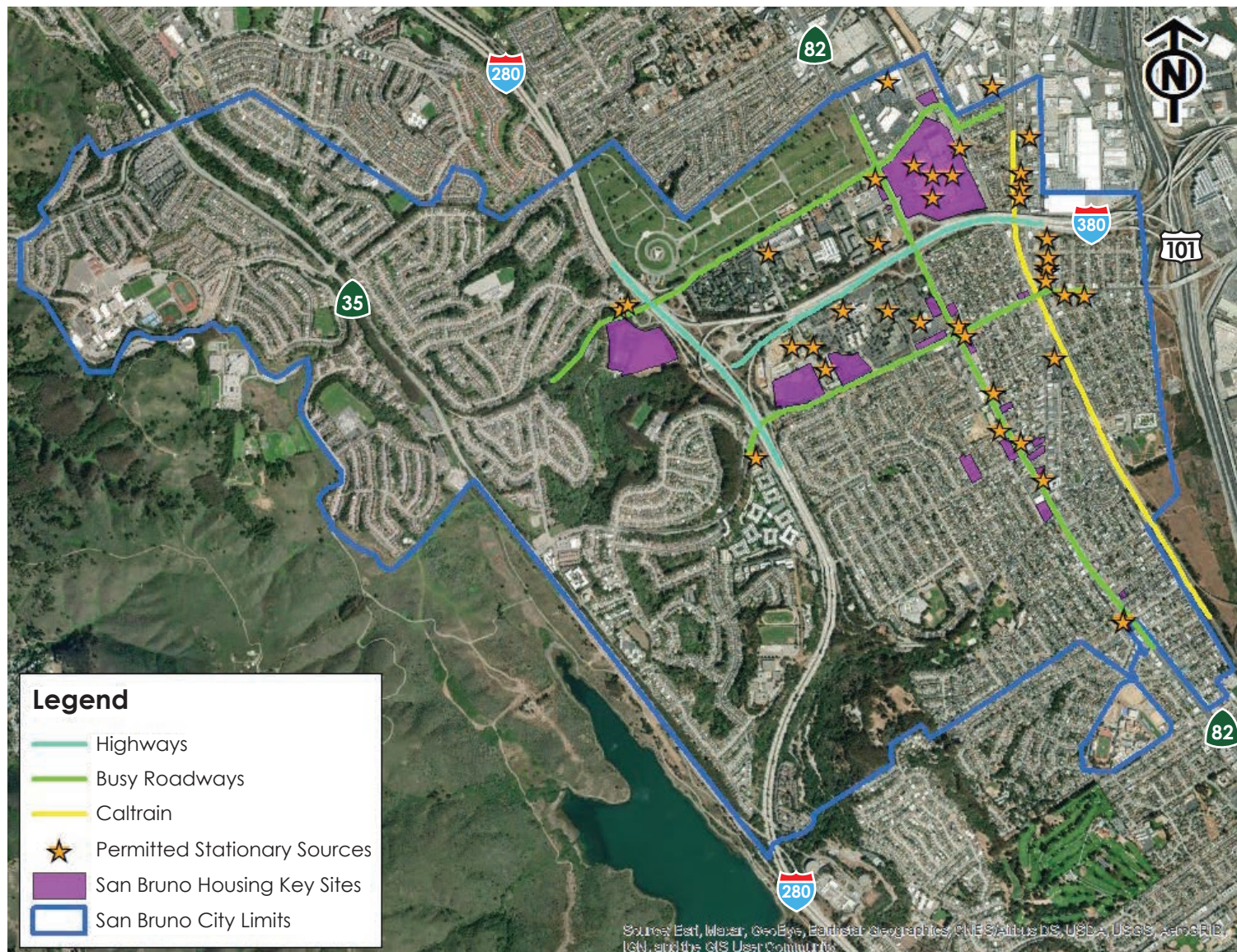
For the reasons outlined above, implementation of the Housing Element would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.

Impact AIR-3: The project would not expose sensitive receptors to substantial pollutant concentrations. **(Less than Significant Impact with Mitigation Incorporated)**

Community Health Risk

As discussed under Impact AIR-1, one of the goals of the 2017 CAP is to eliminate health risks associated with substantial pollutant concentrations. Project impacts related to increased community health risk can occur either by introducing a new source of TACs with the potential to adversely affect existing sensitive receptors in the project vicinity or by significantly exacerbating existing cumulative TAC impacts.

Per BAAQMD guidance, only sensitive receptors within 1,000 feet of TAC sources are at risk of health risk impacts associated with new development. All of the proposed Housing Opportunity Sites are located within 1,000 feet of residential uses, and as shown on Figure 4.3-1, in proximity to highways/freeways, high-volume roadways, and stationary sources of air pollutants and TACs.



HOUSING OPPORTUNITY SITES AND TAC SOURCES

FIGURE 4.3-1

Consistent with the BAAQMD-plan level thresholds, Housing Opportunity Sites located within overlay zones of existing air pollutant and TAC sources are identified in Table 4.3-6.

Table 4.3-6: Screening Distances from Existing Air Pollutant and TAC Sources¹				
Source	Distance to Screening Threshold			Potentially Affected Housing Opportunity Sites
	Cancer Risk	Hazard Index	Annual PM_{2.5}	
Roadway: Interstate 280	300 ft west	--	300 ft west	3, 6
	1,000 ft east	--	1,200 ft east	
Roadway: Interstate 380	500 ft north	--	400 ft north	3, 6, 13, 14, 18, 19, 20
	1,400 ft south	--	1,000 ft south	
Roadway: El Camino Real	300 ft	--	300 ft	1, 2, 4, 5, 7, 9, 10, 11, 12, 14, 16, 17, 18, 19, 20, 22, 23
Roadway: Sneath Lane	100 ft	--	100 ft	6, 14, 19
Roadway: San Bruno Ave	150 ft	--	150 ft	1, 3, 12, 13, 15, 21
Railroad: Caltrain	500 ft west	--	--	14, 15, 21
	3,600 ft east	--	--	
Stationary: #18040 The Shops at Tanforan– Generators	100 ft	--	--	14
Stationary: #200385 SF Police Credit Union– Generators	130 ft	--	--	3, 13
Stationary: #103134 San Bruno Kwik Serv – GDF	230 ft	--	0	3
Stationary: #109025 Tanforan Shell– GDF	140 ft	--	0	14, 18, 19
Stationary: #110666 ARCO Facility #00743 – GDF	125 ft	--	0	10, 16
Stationary: #110761 Rollingwood Chevron – GDF	175 ft	--	0	6
Stationary: #111596 Unocal #0109 – GDF	160 ft	--	0	2, 5, 23

Table 4.3-6: Screening Distances from Existing Air Pollutant and TAC Sources¹				
Source	Distance to Screening Threshold			Potentially Affected Housing Opportunity Sites
	Cancer Risk	Hazard Index	Annual PM_{2.5}	
Stationary: #112375 Rollingwood 76 - Sahbhagi Corp – GDF	100 ft	--	0	6
Stationary: #112418 San Bruno Shell – GDF	190 ft	--	0	1, 12
Source: Illingworth & Rodkin, Inc. <i>San Bruno 2023-2031 Housing Element Update Air Quality & Greenhouse Gas Assessment</i> . September 14, 2022.				
Notes:				
¹ Only existing sources of air pollutants and TAC sources that present potential health risk issues at the proposed Housing Opportunity Sites are reported in this table; a full list of air pollutant and TAC sources is provided in Table 7 of Appendix A.				

Community Health Risk from Construction

Construction equipment and associated heavy-duty truck traffic generates DPM, which is a known TAC. The primary community risk impact issues associated with construction emissions are cancer risk and exposure to PM_{2.5}. DPM poses both a potential health and nuisance impact to nearby receptors.

TACs generated during construction of future development under the Housing Element Update could combine with the TAC sources shown in Figure 4.3-1 and expose existing sensitive receptors to substantial pollutant concentrations. General Plan Policy ERC-33, which requires all large construction projects to mitigate diesel exhaust emissions through use of alternate fuels and control devices, would support the 2017 CAP goal of reducing and eliminating health risks associated with future construction completed under the Housing Element Update. General Plan policies ERC-25, ERC-26, ERC-28, and ERC-30 (see discussion below under Community Health Risk from Operation and Fugitive Dust) would further support achievement of this goal by reducing cumulative health risks, including construction health risks, associated with implementation of the Housing Element Update. However, since (at this time) specific construction plans and schedules for future development under the project are not known, it is not possible to quantify the individual and cumulative impacts associated with future development. Therefore, in order to determine whether future construction could result in individually or cumulatively significant impacts, health risk assessments, consistent with policy ERC-33, would need to be prepared for each individual project completed under the Housing Element Update.

Mitigation Measures:

- MM AIR-3.1:** Prior to approval, the 2023-2031 Housing Element shall include a policy requiring future development at all Housing Opportunity Sites to implement the following measures during demolition and construction:
- a. Use Tier 4 engines for all off-road equipment greater than 50 horsepower (hp) and operating for more than 20 total hours over the entire duration of construction activities.
 - b. Use diesel trucks with 2010 or later compliant model year engines during construction.
 - c. Use renewable diesel during construction.
 - d. Use low-VOC coatings during construction.
 - e. Implement BAAQMD best management practices and if necessary, enhanced measures recommended by BAAQMD.
 - f. Use portable electrical equipment where commercially available and practicable to complete construction. Construction contractors shall utilize electrical grid power instead of diesel generators when (1) grid power is available at the construction site; (2) when construction of temporary power lines are not necessary in order to provide power to portions of the site distant from existing utility lines; (3) when use of portable extension lines is practicable given construction safety and operational limitations; and (4) when use of electrical grid power does not compromise construction schedules.
- MM AIR-3.2:** Prior to approval, the 2023-2031 Housing Element shall include a policy requiring future development at all Housing Opportunity Sites to conduct a construction and operational health risk assessment (HRA) prior to the issuance of discretionary permits that would allow demolition or construction activities to take place (whichever occurs first). If the HRA demonstrates, to the satisfaction of the City, that the health risk exposures for adjacent receptors will be less than BAAQMD project-level thresholds, then additional mitigation would be unnecessary. However, if the HRA demonstrates that health risks would exceed BAAQMD project level thresholds, additional feasible on- and off-site mitigation shall be analyzed to further reduce risks to the greatest extent practicable.

Consistent with BAAQMD plan-level thresholds of significance for health risks, this Initial Study has identified overlay zones for sources of air pollutants and TACs, and goals, policies and objectives to minimize potentially adverse impacts associated with future construction activities. Therefore, community health risk associated with construction of future development under the Housing Element Update would not expose sensitive receptors to substantial pollutant concentrations. **(Less than Significant Impact with Mitigation Incorporated)**

Community Health Risk from Operation

Implementation of the Housing Element Update would result in the Housing Opportunity Sites identified in Table 3.2-1 being redeveloped with new or higher density residential uses. Residential uses primarily generate light-duty vehicle traffic (i.e., gasoline- or electric-powered) as opposed to other types of land uses (e.g., distribution centers, quarries, manufacturing facilities, etc.) that generate heavy-duty vehicle traffic (i.e., diesel-powered) that are the primary source of traffic-generated TAC impacts.

Pursuant to BAAQMD guidance, roadways with less than 10,000 average daily trips (ADT) are considered a low-impact source of TACs.²⁹ Conservatively, without factoring in the net difference in trips generated by existing uses present at the Housing Opportunity Sites, implementation of the Housing Element Update on the 23 Housing Opportunity Sites is projected to result in 14,451 ADT.³⁰ Based on the total number of trips and projected number of trips that would be added to major roadway segments at AM and PM peak hours, and the distribution of the Housing Opportunity Sites and associated distribution of trips, the project is not anticipated to cause any roadways not already in excess of 10,000 ADT to exceed 10,000 ADT. As noted above, trips generated by the project would be primarily light-duty, and vehicle traffic is increasingly electric-powered (refer to Section 4.6 Energy and Section 4.8 Greenhouse Gas Emissions). Vehicle trips generated by future development under the Housing Element Update would be further reduced by:

- General Plan Policy ERC-25, which requires projects with air quality impacts to implement TDM techniques;
- General Plan Policy ERC-28, which requires local planning and development activities to incorporate subdivision, zoning, and site design measures that reduce the number and length of single-occupant automobile trips;
- General Plan Policy ERC-30, which encourages new residential developments to incorporate measures such as shuttle services to major employment centers, commercial areas and transit areas, and provide adequate transit facilities.

In addition to vehicle traffic, future development under the project may include testing and emergency operation of diesel generators. Installation and operation of diesel generators requires a permit from BAAQMD, which requires generators to be operated in accordance with BAAQMD rules and regulations that would ensure sensitive receptors are not significantly exposed to generator emissions.

In addition to the reasons outlined above, cumulative health risks would be reduced through implementation of MM AIR-3.1 above, and future development would be required to complete a HRA prior to construction that ensures operation of future development does not result individually

²⁹ Bay Area Air Quality Management District (BAAQMD). *Recommended Methods for Screening and Modeling Local Risks and Hazards, Version 3.0*. May 2012.

³⁰ After completion of the analysis presented in this Initial Study, the number of units assumed at Sites 8 and 21 increased by one unit each, the number of units assumed at Site 22 decreased by one unit, and the number of pipeline units decreased by one unit, resulting in a net increase of one unit and two residents assumed at the Housing Opportunity Sites (2,708 units versus 2,709 units, 7,150 residents versus 7,152 residents) and no increase in the total number of units and residents assumed for the Housing Element Update as a whole (3,618 units and 9,552 residents total). This change would not affect any of the conclusions presented herein this Initial Study.

or cumulatively in health risks for sensitive receptors in excess of BAAQMD project-level thresholds.

Consistent with BAAQMD plan-level thresholds of significance for health risks, this Initial Study has identified overlay zones for sources of air pollutants and TACs, and goals, policies and objectives to minimize potentially adverse impacts associated with operational activities. Therefore, community health risk associated with operation of future development under the Housing Element Update would not expose sensitive receptors to substantial pollutant concentrations. **(Less than Significant Impact with Mitigation Incorporated)**

Fugitive Dust

Construction activities, particularly during site preparation and grading, would temporarily generate fugitive dust in the form of PM₁₀ and PM_{2.5}. Sources of fugitive dust would include disturbed soils at the construction site and trucks carrying uncovered loads of soils. Unless properly controlled, vehicles leaving the site would deposit mud on local streets, which could be an additional source of airborne dust after it dries. The BAAQMD CEQA Air Quality Guidelines consider these impacts to be less than significant if the following best management practices are implemented.

BAAQMD Best Management Practices:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- 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.
- All vehicle speeds on unpaved roads shall be limited to 15 miles per hour (mph).
- 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.
- 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.
- 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.
- Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

Implementation of the BAAQMD best management practices identified above is required by General Plan Policy ERC-26 and MM AIR-3.1. Therefore, fugitive dust generated during construction of

future development under the Housing Element Update would not expose sensitive receptors to substantial pollutant concentrations.

Health Risks from Criteria Air Pollutants

In a 2018 decision (*Sierra Club v. County of Fresno*), the state Supreme Court determined CEQA requires that when a project's criteria air pollutant emissions would exceed applicable thresholds and contribute a cumulatively considerable contribution to a significant cumulative regional criteria pollutant impact, the potential for the project's emissions to affect human health in the air basin must be disclosed. State and federal ambient air quality standards are health-based standards, and exceedances of those standards result in continued unhealthy levels of air pollutants. As stated in the 2017 BAAQMD CEQA Air Quality Guidelines, air pollution by its nature is largely a cumulative impact. 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 impacts. In developing thresholds of significance for air pollutants, BAAQMD considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project has a less than significant impact for criteria pollutants, it is assumed to have no adverse health effect.

As discussed under Impact AIR-2, buildout of the Housing Element Update would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. Criteria air pollutant emissions associated with buildout of the TCP and Bayhill Specific Plan would be further reduced with implementation of the mitigation measures identified in Section 4.3.2.1. Therefore, criteria air pollutants generated by implementation of the project would not expose sensitive receptors to substantial pollutant concentrations.

Impact AIR-4: The project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. **(Less than Significant Impact)**

Construction activities associated with buildout of the Housing Element Update would generate localized emissions of diesel exhaust during construction equipment operation and truck activity. These emissions may be noticeable from time to time by adjacent receptors; however, the odors would be localized and temporary and are not likely to affect people off-site. Odors associated with the application of paints and coatings may also be noticeable on occasion by adjacent receptors. Painting and coating of the project would occur during daytime hours only, would be localized, and would be generally confined to the project site. These odors would also be temporary.

Odors are generally considered an annoyance rather than a health hazard. Land uses that have the potential to be sources of odors that generate complaints include, but are not limited to, wastewater treatment plants, landfills, composting operations, and food manufacturing facilities. Implementation of the Housing Element would only lead to buildout of residential uses, which do not generate objectionable odors or any other type of emissions that could adversely affect a substantial number of people.

4.4 BIOLOGICAL RESOURCES

4.4.1 Environmental Setting

4.4.1.1 *Regulatory Framework*

Federal and State

Endangered Species Act

Individual plant and animal species listed as rare, threatened, or endangered under state and federal Endangered Species Acts are considered special-status species. Federal and state endangered species legislation has provided the United States Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW) with a mechanism for conserving and protecting plant and animal species of limited distribution and/or low or declining populations. Permits may be required from both the USFWS and CDFW if activities associated with a proposed project would result in the take of a species listed as threatened or endangered. To “take” a listed species, as defined by the State of California Fish and Game Code Section 86, is “to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill” these species. “Take” is more broadly defined by the federal Endangered Species Act (16 United States Code (USC) 1532) to include harm of a listed species.

In addition to species listed under state and federal Endangered Species Acts, Sections 15380(b) and (c) of the CEQA Guidelines provide that all potential rare or sensitive species, or habitats capable of supporting rare species, must be considered as part of the environmental review process. These may include plant species listed by the California Native Plant Society and CDFW-listed Species of Special Concern.³¹

Migratory Bird Treaty Act

The federal Migratory Bird Treaty Act (MBTA) prohibits killing, capture, possession, or trade of migratory birds except in accordance with regulations prescribed by the Secretary of the Interior. Hunting and poaching are also prohibited. This includes direct and indirect acts, except for harassment and habitat modification, which are not included unless they result in direct loss of birds, nests, or eggs. The CDFW also protects migratory and nesting birds under California Fish and Game Code Sections 3503, 3503.5, and 3800. The CDFW considers causing abandonment and/or loss of reproductive efforts through disturbance on bird species to be a “taking”.

³¹ A “Species of Special Concern” is a species, subspecies, or distinct population of an animal native to California that currently satisfies one or more of the following criteria:

- Is extirpated from the State or, in the case of birds, is extirpated in its primary season or breeding role;
- Is listed as Federally-, but not State-, threatened or endangered; meets the State definition of threatened or endangered but has not formally been listed;
- Is experiencing, or formerly experienced, serious (noncyclical) population declines or range retractions (not reversed) that, if continued or resumed, could qualify it for State threatened or endangered status;
- Has naturally small populations exhibiting high susceptibility to risk from any factor(s), that if realized, could lead to declines that would qualify it for State threatened or endangered status.

Sensitive Habitat Regulations

Wetland and riparian habitats are considered sensitive habitats under CEQA. They are also afforded protection under applicable federal, state, and local regulations, and are generally subject to regulation by the United States Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), CDFW, and/or the USFWS under provisions of the federal Clean Water Act (e.g., Sections 303, 304, 404) and State of California Porter-Cologne Water Quality Control Act.

California Fish and Game Code

Streambeds and banks, as well as associated riparian habitat, are regulated by the CDFW per Section 1602 of the Fish and Game Code. Work within the bed or banks of a stream or the adjacent riparian habitat requires a Streambed Alteration Agreement from the CDFW. Sections 3503, 3503.5, and 3513 protect native birds and raptor nests when in active use.

Local

City of San Bruno General Plan

Various policies in the City's General Plan have been adopted for the purpose of avoiding or mitigating biological impacts resulting from planned development within the City, including the following:

Policies	Description
LUD-33	Plant additional street trees along the existing buffer between Huntington Avenue and the residential frontage road due east of the San Bruno BART Station.
LUD-73	Require buildings with a continuous façade of 100 feet or longer to use non-reflective materials to minimize adverse impact of glare.
OSR-28	Preserve Crestmoor Canyon in a natural state. Minimize changes to natural landforms, topography, rock outcroppings, mature tree stands, and other vegetation, while accommodating a multi-use trail and supporting facilities. Exceptions may be made for any necessary changes in order to improve slope stability.
OSR-29	Prevent erosion in Crestmoor Canyon through planting of native species along steep slopes and drainage swales.
OSR-32	During plan review, assure that development on city lands is compatible with preservation of Crestmoor Canyon, Junipero Serra Park, San Francisco Peninsula Watershed lands, Golden Gate National Recreation Area, and San Francisco International Airport wetlands in a natural state.
OSR-33	Balance fire preventions goals with the preservation of the mature tree stands along the city's scenic corridors, including Sneath Lane, Skyline Boulevard, I-280, and Crystal Springs Road, consistent with the Tree Preservation Ordinance and Ordinance 1284. Landscaping of public rights-of-way along these corridors should complement the natural state.
OSR-34	Protect mature trees, as feasible, during new construction and redevelopment. Require identification of all trees over six inches in diameter and approval of landscaping plans during design review.

Policies	Description
OSR-38	Require open space easements or deed restrictions on undevelopable property. Through the plan review process, require recordation of open space easement, deed restriction, dedication or other legal means of permanently restricting development of open space lands.
ERC-A	Preserve open space essential for the conservation of San Bruno's natural resources – including vegetation, wildlife, soils, water, and air.
ERC-B	Protect the natural environment, including wildlife, from destruction during new construction or redevelopment within San Bruno.
ERC-C	Recognize areas of overlapping jurisdiction with respect to open space and environmental resources, and coordinate the City's actions with efforts of surrounding cities, agencies, and San Mateo County.
ERC-1	Preserve as open space those lands which are identified, through environmental review, as sensitive habitat areas. Require setbacks to development as buffer areas, as appropriate.
ERC-2	Preserve as open space those portions of property which have significant value to the public as scenic resources, aesthetic, or recreation purposes.
ERC-3	Protect natural vegetation in park, open space, and scenic areas as wildlife habitat, to prevent erosion, and to serve as noise and scenic buffers.
ERC-5	Preserve critical habitat areas and sensitive species within riparian corridors, hillsides, canyon areas, tree canopies, and wetlands that are within the City's control (Figure 6-1). Protect declining or vulnerable habitat areas from disturbance during design and construction of new development.
ERC-6	Preserve wetland habitat in the San Francisco Bay Margins along the eastern edge of city land as permanent open space (Figure 6-1). Where jurisdiction allows, establish buffer zones at the edge of wetland habitats and identify buffer zones as areas to restrict development. Environmental concerns should be addressed during stormwater maintenance activities.
ERC-7	Ensure that construction adjacent to open canyon areas is sensitive to the natural environment. Preserve the natural topography and vegetation.
ERC-8	If development occurs adjacent to a wetlands area, ensure that a qualified biologist has conducted a wetlands delineation in accordance with federal and State guidelines.
ERC-9	Preserve mature trees and vegetation, including wildflowers, within open canyon areas and along the city's scenic roadways.
ERC-10	Require incorporation of native plants into landscape plans for new development as feasible – especially in areas adjacent to natural areas, such as canyons or scenic roadways (Figure 6-1). Require preservation of mature trees, as feasible, during design and construction.
ERC-11	Prohibit the use of any new non-native invasive plant species in any landscaped or natural area. Develop a program for abatement of non-native invasive species in open space or habitat areas.
ERC-12	Balance the need for fire safety and invasive plant species management with new considerations along the city's scenic corridors. Encourage buildings to be locked outside of the tree's drip-line or 12 feet from the tree trunk, whichever is greater, and/or incorporating special techniques to minimize root damage, etc.
ERC-13	Through environmental review, assure that all projects affecting resources of regional concern (e.g., the San Francisco garter snake habitat, water and air quality, the San Francisco Fish and Game Reserve) satisfy regional, State and federal laws.

Policies	Description
ERC-14	<p>Preserve wetlands habitat and associated species in compliance with the federal “no net loss” policy using mitigation measures such as:</p> <ul style="list-style-type: none"> • Avoidance of sensitive habitat areas; • Clustering of development away from wet lands; • Transfer of development rights for preservation of existing sensitive lands; and/or • Compensatory in-kind mitigation, such as restoration or creation.
ERC-15	Consult with the California Department of Fish and Game to determine significant habitat areas. Identify priorities for acquisition or maintenance of open space areas based on biological or environmental concerns.
ERC-16	Conduct presence/absence biological surveys for sensitive plant and animal species in natural areas prior to any construction activities proposed adjacent to or within identified natural areas (Figure 6-1). If no special status species are detected during these surveys, then construction-related activities may proceed. If listed special status species are found with the construction zone, then avoid these species and their habitat or consult with U.S. Fish and Wildlife Service and/or California Department of Fish and Game.
ERC-17	If construction activities, including tree removal activities, are required adjacent to or within natural areas (Figure 6-1), then avoid activities during March through June unless a bird survey is conducted to determine that the tree is unused during the breeding season by avian species that are protected under California Fish and Game Codes 3503, 3503.5, and 3511.
ERC-18	Coordinate efforts with the San Mateo County Flood Control District, Caltrans, Golden Gate National Recreation Area, San Francisco Airport, Peninsula Watershed lands, and Junipero Serra County Park to develop or preserve and manage interconnecting wildlife movement corridors.
PFS-34	Identify and remove mature and/or diseased Eucalyptus trees in rights-of-way and other open areas, if they pose a fire hazard or other threat to health and safety.

City of San Bruno Municipal Code

Chapter 8.24 of the City of San Bruno Municipal Code, “Street Trees and Other Plantings”, regulates the planting and maintenance of trees and other plantings in and along the public streets, ways, and public easements within the city. Chapter 8.25, “Heritage Trees”, protects certain trees located on private property within the City of San Bruno, including:

- Any native bay (*Umbellularia californica*), buckeye (*Aesculus species*), oak (*Quercus species*), redwood (*Sequoia sempervirens*), or pine (*Pinus radiata*) tree that has a diameter of six inches or more measured at 54 inches above natural grade;
- Any tree or stand of trees designated by resolution of the city council to be of special historical value or of significant community benefit;
- A stand of trees, the nature of which makes each dependent on the others for survival; or
- Any other tree with a trunk diameter of ten inches or more, measured at 54 inches above natural grade.

Bayhill Specific Plan

As noted in Section 3.1.1.1, Housing Opportunity Sites 3 and 13 are located within the Bayhill Specific Plan area. Chapter Six of the Bayhill Specific Plan includes mandatory “Urban Design Policies”, including the following which pertain to biological resources.

Policy 3-2

Policy 3-2 requires street trees, lighting, landscaping, and other amenities be provided by new development along their entire street frontages. Among other requirements, Policy 3-2 requires trees removed during construction to be replaced at a minimum ratio of 1:1.

Policy 6-26

In order to avoid or minimize impacts to nesting birds during nesting season (identified as February 1 to August 31), Policy 6-26 requires construction activities to either occur outside of nesting season, or a pre-construction survey must be conducted for active nests. If any active nests are identified, Policy 6-26 prescribes measures for protecting nests (i.e., establishing no-disturbance buffer zones).

4.4.1.2 *Existing Conditions*

Although urbanization has removed much of the City’s original vegetation, San Bruno includes several distinct vegetative communities, including coyote brush scrub, freshwater wetland, willow riparian, mixed-oak woodland, eucalyptus woodland, mixed pine-oak-eucalyptus woodland, and non-native grassland. The location of vegetative communities (including wetlands) and special-species habitat within the City of San Bruno relative to the identified Housing Opportunity Sites is shown on Figure 4.4-1. No portion of the City of San Bruno is within the boundaries of a habitat conservation plan; the nearest region under a conservation plan is San Bruno Mountain to the north of the City limits.

General Plan and Municipal Code Conforming Sites

Residential development at the densities proposed by the Housing Element Update (refer to Table 3.2-1) are allowed at Housing Opportunity Sites 6, 8, 10, 16, 18, and 19 under their existing General Plan land use designation and zoning designation, and therefore no General Plan amendments or rezoning is required. The existing conditions at these sites related to biological resources are discussed below.

Housing Opportunity Site 6

Housing Opportunity Site 6 is currently developed with multiple uses, including a privately operated golf driving range, parking lot storage for a private bus operator, and a maintenance building for the San Bruno Park School District. As shown on Figure 4.4-1, the majority of Site 6 is mapped as urban/highly disturbed land cover; however, small undeveloped portions along the southern and eastern border provide potential habitat for sensitive species and nesting birds.

The site is bordered by I-280 to the east and the Crestmoor Canyon open space areas in all other directions. Beyond Crestmoor Canyon are single-family residences to the west, north, and south as well as two gas stations across Sneath Lane to the north. The areas southwest of Site 6 are mapped as

potential sensitive species and nesting bird habitat, while the areas southeast of Site 6 are mapped as potential nesting bird habitat only. An aboveground channelized portion of San Bruno Creek transitions belowground at the westernmost border of Site 6; San Bruno Creek remains underground until emptying into the San Bruno Canal, located approximately 1.75 miles east of Site 6.

Housing Opportunity Site 8

Housing Opportunity Site 8 is currently developed with the former Edgemont Elementary School campus. The campus consists of two one-story gabled-roof buildings with rooftop solar panels, a surface parking lot, and a playground area. As shown on Figure 4.4-1, Site 8 and the surrounding area is mapped as urban/highly disturbed land cover and do not contain any vegetative communities, wetlands, or habitat suitable for special status species. There are a number of mature trees present on site. The nearest waterway is Crystal Springs Creek, located approximately 0.5-miles south of Site 8.

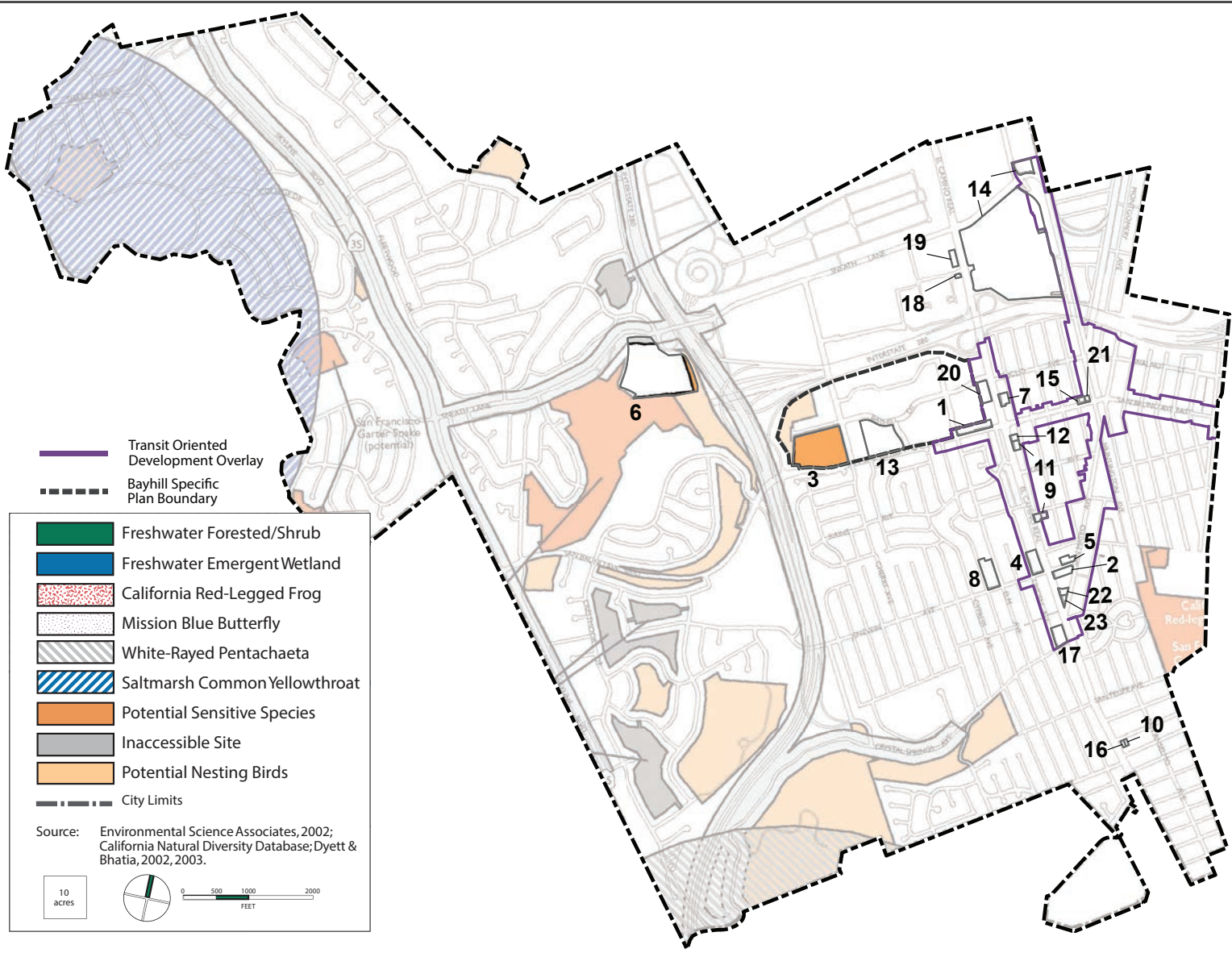


FIGURE 4.4-1

Housing Opportunity Sites 10 and 16

Housing Opportunity Sites 10 and 16 are vacant dirt lots that are located adjacent to each other on San Marco Avenue. As shown on Figure 4.4-1, the sites and surrounding area are mapped as urban/highly disturbed land cover and do not contain any vegetative communities, wetlands, or habitat for special status species. Minimal vegetation (including trees and shrubs) is present on-site. The nearest waterway is Crystal Springs Creek, approximately 0.55-miles west of Sites 10 and 16.

Housing Opportunity Site 18

Housing Opportunity Site 18 is developed with a two-story building, pedestrian plaza, and surface parking lot. As shown on Figure 4.4-1, Site 18 and the surrounding area is mapped as urban/highly disturbed land cover and does not contain any vegetative communities, wetlands, or habitat for special status species. Site 18 is well-landscaped, consisting of numerous mature trees, shrubs, and groundcover. The nearest waterway is the San Bruno Canal, located approximately 0.75-miles east of Site 18.

Housing Opportunity Site 19

Housing Opportunity Site 19 is developed with a single-story building and surface parking lot. As shown on Figure 4.4-1, Site 19 and the surrounding area is mapped as urban/highly disturbed land cover and does not contain any vegetative communities, wetlands or habitat for special status species. Site 19 is poorly landscaped with no mature trees and minimal shrubbery. The nearest waterway is the San Bruno Canal, located approximately 0.75-miles east of Site 19.

Transit Corridors Plan Area Sites

As noted in Section 3.1.1.1, Housing Opportunity Sites 1, 2, 4, 5, 7, 9, 11, 12, 15, 17, 20, 21, 22, and 23 are located within the TCP area. The TCP area is fully urbanized and characterized by diverse land uses, building forms, parcel sizes and surface parking lots. According to the TCP EIR, no riparian habitat, wetlands, wildlife corridors, or other sensitive natural communities are present within the TCP area.³² Large Monterey pine, Monterey cypress, blue gum eucalyptus and oak trees are present throughout the TCP area that could provide nesting habitat for urban adapted birds and certain bat species.

Bayhill Specific Plan Area Sites

As noted in Section 3.1.1.2, Housing Opportunity Sites 3 and 13 are located within the Bayhill Specific Plan area. The Bayhill Specific Plan area is approximately 92.2 acres in size and encompasses the Bayhill Office Park, Bayhill Shopping Center, and Marriott Courtyard Hotel. At the time of preparation of the Bayhill Specific Plan EIR, an isolated 11-acre portion of the Bayhill Specific Plan area was vacant and dominated by non-native vegetation (primarily eucalyptus trees); this area is currently being developed. Biological surveys prepared as part of the Bayhill Specific Plan EIR determined that no habitat suitable for special status species, riparian habitat, wetlands, wildlife corridors, or other sensitive natural communities are present with the Bayhill Specific Plan area. Mature trees and other vegetation are present within the Bayhill Specific Plan area, including

³² City of San Bruno. San Bruno *Transit Corridors Plan Draft Environmental Impact Report*. Page 15-4. March 2012.

native and non-native trees. Most of the trees are ornamental landscaping in roadway medians and parking lot islands.

Housing Opportunity Site 14

Housing Opportunity Site 14 consists of 1122-1188 El Camino Real/300 Tanforan Shopping Center, which is developed with the Shops at Tanforan shopping mall, and 1292 Huntington Avenue, which is located opposite the Shops at Tanforan across the Sneath Lane/Huntington Avenue intersection and is developed with a vacant paved lot. Vegetation at the Shops at Tanforan is minimal, consisting primarily of street trees and landscaping with almost no interior vegetation; landscaping at 1292 Huntington Avenue is non-existent besides a row of shrubbery. As shown on Figure 4.4-1, Site 14 and the surrounding area is mapped as urban/highly disturbed land cover and does not contain any vegetative communities, wetlands, or habitat for special status species. The nearest waterway is the San Bruno Canal, located approximately 0.5-miles east of Site 14.

4.4.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
1) 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 California Department of Fish and Wildlife (CDFW) or United States Fish and Wildlife Service (USFWS)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
6) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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 local or regional plans, policies, or regulations, or by the CDFW or USFWS. **(Less than Significant Impact with Mitigation Incorporated)**

Special Status Species

As documented in Section 4.4.1.2, none of the Housing Opportunity Sites (with the exception of Site 6, discussed below) have habitat present on site, or are located near habitat, that would support special status species, and therefore, implementation of the Housing Element would not have a substantial adverse effect, either directly or through habitat modifications, on any special status species.

Site 6 is 21.1 acres, located on the south side of Sneath Lane west of I-280 freeway, and currently developed with multiple uses, including a privately operated golf driving range, parking lot storage for a private bus operator, and a maintenance building for the San Bruno Park School District. The majority of Housing Opportunity Site 6 is urban/highly disturbed land cover; however, the areas southwest of Site 6 are mapped as potential sensitive species and nesting bird habitat, while the areas southeast of Site 6 are mapped as potential nesting bird habitat only. An aboveground channelized portion of San Bruno Creek transitions belowground at the westernmost border of Site 6.

The Housing Element anticipates Site 6 would be redeveloped with approximately 118 single-family homes. Future residential development envisioned by the Housing Element on Site 6 would not substantially affect special status species by adhering to the various General Plan policies listed in Section 4.4.1.1, including ERC-1, which requires preservation of open space land identified as sensitive habitat areas, and setbacks to development as buffer areas, ERC-5, which requires preservation of critical habitat areas and sensitive species within riparian corridors, and ERC-16, which requires biological surveys for development adjacent to or within an identified natural area, such as riparian corridors. **(Less than Significant Impact)**

Nesting Birds and Migratory Raptors

As discussed in Section 4.4.1.2, trees are located on and adjacent to many of the Housing Opportunity Sites, that could serve as nesting habitat for birds, including migratory birds and raptors. Nesting birds are among the species protected under provisions of the Migratory Bird Treaty Act and California Fish and Game Code Sections 3503, 3503.5, and 2800. Disturbances caused by demolition

and/or construction activities during the breeding season could result in the loss of fertile eggs or nest abandonment. Furthermore, tree removal during the nesting season (February 1st through August 31st) could potentially impact protected raptors and/or other protected migratory birds. Any loss of fertile bird eggs, individual nesting eggs, or any activities resulting in nest abandonment during construction would constitute a significant impact.

Mitigation Measures:

- MM BIO-1.1:** Prior to approval, the 2023-2031 Housing Element shall include a policy requiring future development at Housing Opportunity Sites to comply with the following measures:
- a. Demolition and nesting substrate (e.g., trees, bushes, grasses, and other vegetation) removal activities shall be scheduled to avoid nesting season (February 1 to August 31). To the extent feasible, construction activities shall be scheduled to occur during the non-nesting season (September 1 through January 31).
 - b. Prior to issuance of any discretionary permits that would allow construction activities during the nesting season, a qualified biologist shall complete pre-construction surveys for active nests within 14 days of work commencing. The survey area must include the proposed development area and all areas within 300 feet of the development area boundary (“zone of influence”). If active nest, roost, or burrow sites are identified within the zone of influence, a no-disturbance buffer shall be established for all active nest sites prior to commencement of any proposed construction-related activities to avoid disturbances to migratory bird nesting activities. A no-disturbance buffer constitutes a zone in which construction activities cannot occur. The sizes of the buffers shall be determined by a qualified biologist based on the species, activities proposed near the nest, and topographic and other visual barriers. Buffers shall remain in place until the young have departed the area or fledged and/or the nest is inactive, as determined by the qualified biologist.
 - c. If work is necessary within a buffer zone of an active bird nest, work may occur under the supervision of a qualified avian biologist. The qualified avian biologist monitoring the construction work shall have the authority to stop work and adjust buffers if any disturbance to nesting activity is observed.

Implementation of MM BIO-1.1 would ensure that future redevelopment of the Housing Opportunity Sites does not result in the loss of fertile or nesting eggs or nest abandonment. MM BIO-1.1a would prohibit demolition and nesting substrate removal activities during nesting season, which would ensure that nesting does not occur during the nesting season while construction activities may be ongoing. Impacts to nesting birds and raptors would be avoided entirely if all demolition, nesting substrate removal, and construction activities can be scheduled during the non-nesting season. Prior to the initiation of any construction activities during nesting season, implementation of MM BIO-

1.1b would require active nests be identified and no-disturbance buffer zones established by a qualified biologist, which would prevent any construction activities that could result in the loss of fertile or nesting eggs or nest abandonment. Any construction activities within these buffer zones would only be permitted under the supervision of a qualified avian biologist, who would have the authority to stop work should any activities that could result in the loss of fertile or nesting eggs or nest abandonment to occur. For these reasons, implementation of the Housing Element as amended by MM BIO-1.1 would ensure that future residential development at all sites would have a less than significant impact on nesting birds and migratory raptors. **(Less than Significant Impact with Mitigation Incorporated)**

Impact BIO-2: The project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS. **(Less than Significant Impact)**

As documented in Section 4.4.1.2, none of the Housing Opportunity Sites (with the exception of Site 6, discussed below) are located on or adjacent to any riparian corridors or other sensitive natural community.

Site 6 is 21.1 acres, located on the south side of Sneath Lane west of I-280 freeway, and currently developed with multiple uses, including a privately operated golf driving range, parking lot storage for a private bus operator, and a maintenance building for the San Bruno Park School District. The majority of Housing Opportunity Site 6 is urban/highly disturbed land cover; however, an aboveground channelized portion of San Bruno Creek transitions belowground at the westernmost border of Site 6; San Bruno Creek remains underground until emptying into the San Bruno Canal, located approximately 1.75 miles east of Site 6. The Housing Element anticipates Site 6 would be redeveloped with approximately 118 single-family homes. Future residential development envisioned by the Housing Element on Site 6 would not substantially affect the portion of San Bruno Creek that is above ground on or near the site by adhering to the various General Plan policies listed in Section 4.4.1.1, including ERC-1, which requires preservation of open space land identified as sensitive habitat areas, and setbacks to development as buffer areas, ERC-5, which requires preservation of critical habitat areas and sensitive species within riparian corridors, ERC-10, which requires native plants in landscape plans and preservation of mature trees adjacent natural areas, ERC-11, which prohibits non-native plant species in landscape plans in natural areas or sensitive habitats, and ERC-16, which requires biological surveys for development adjacent to or within an identified natural area, such as riparian corridors.

Impact BIO-3: The project would not have a substantial adverse effect on state or federally protected wetlands through direct removal, filling, hydrological interruption, or other means. **(No Impact)**

As documented in Section 4.4.1.2, none of the Housing Opportunity Sites contain wetlands, and therefore implementation of the Housing Element would not result in substantial adverse effects on state or federally protected wetlands.

Impact BIO-4: The project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. **(Less than Significant Impact)**

As documented in Section 4.4.1.2, none of the Housing Opportunity Sites (with the exception of Site 6) provide any habitat that could serve as a corridor or nursery for resident or migratory wildlife outside of the birds discussed in Impact BIO-1. The absence of any waterways on the Housing Opportunity Sites (other than Site 6) precludes the potential to impact any resident or migratory fish species. Therefore, future residential development at the Housing Opportunity Sites would not interfere substantially with the movement of any species, with established native resident or migratory wildlife corridors, or the use of native wildlife nursery sites.

As noted previously, Housing Opportunity Site 6 is urban/highly disturbed land cover; however, an aboveground channelized portion of San Bruno Creek transitions belowground at the westernmost border of Site 6. To the extent that the channelized San Bruno Creek functions as a wildlife corridor, implementation of the various General Plan policies discussed above under Impact BIO-2 (ERC-1, ERC-5, ERC-10, ERC-11, and ERC-16), would ensure that future residential development envisioned by the Housing Element on Site 6 would not substantially affect the portion of San Bruno Creek that is above ground on or near the site and the use of that portion of San Bruno Creek as a wildlife corridor.

Impact BIO-5: The project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. **(Less than Significant Impact)**

As discussed in Section 4.4.1.2, trees are located on and adjacent to many of the Housing Opportunity Sites. Future redevelopment of the Housing Opportunity Sites may require the removal of trees, including heritage and street trees, that are present on-site, or construction could impact trees on adjacent properties, such as shared property lines. Prior to removal of any protected trees, residential projects on the Housing Opportunity Sites would be required to obtain Heritage Tree and Street Tree removal permits as required by the City's Municipal Code. The future housing projects would also be required to conform with the replacement requirements outlined in San Bruno Municipal Code sections 8.24.090 and 8.25.050.³³ Additionally, adherence to General Plan policy OSR-34, which requires protection of mature trees during new construction and redevelopment, would ensure that trees intended to remain on a site or adjacent to a site, would be protected from construction activity. Accordingly, future residential development of the Housing Opportunity Sites would not lead to any conflict with any local policies or ordinances protecting biological resources, including tree preservation policies or ordinances.

³³ Street trees and heritage trees are required to be replaced by either two twenty-four-inch box size trees or one thirty-six-inch box size tree for each tree removed.

Impact BIO-6: The project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. **(No Impact)**

No portion of the City of San Bruno is located within the boundaries of an adopted conservation plan area. Thus, there are no possible conflicts for the Housing Element with the provisions of any adopted conservation plans.

4.5 CULTURAL RESOURCES

The following discussion is based, in part, on a Cultural Resources Sensitivity Report prepared for the project by Archaeological/Historical Consultants. The report, dated September 2022, is on file with the Community and Economic Development Department.

4.5.1 Environmental Setting

4.5.1.1 *Regulatory Framework*

Federal and State

National Historic Preservation Act

Federal protection is legislated by the National Historic Preservation Act of 1966 (NHPA) and the Archaeological Resource Protection Act of 1979. These laws maintain processes for determination of the effects on historical properties eligible for listing in the National Register of Historic Places (NRHP). Section 106 of the NHPA and related regulations (36 Code of Federal Regulations [CFR] Part 800) constitute the primary federal regulatory framework guiding cultural resources investigations and require consideration of effects on properties that are listed or eligible for listing in the NRHP. Impacts to properties listed in the NRHP must be evaluated under CEQA.

The NRHP is the nation's master inventory of historic resources that are considered significant at the national, state, or local level. The minimum criteria for determining NRHP eligibility include:

- The property is at least 50 years old (properties under 50 years of age that are of exceptional importance or are contributors to a district can also be included in the NRHP);
- It retains integrity of location, design, setting, materials, workmanship, feeling, and associations; and
- It possesses at least one of the following characteristics:
 - Association with events that have made a significant contribution to the broad patterns of history;
 - Association with the lives of persons significant in the past;
 - Distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or possesses high artistic values, or represents a significant, distinguishable entity whose components may lack individual distinction; or
 - Has yielded, or may yield, information important to prehistory or history.

California Register of Historical Resources

The guidelines for identifying historic resources during the project review process under CEQA are set forth in Public Resources Code Section 21084.1 and CEQA Guidelines Section 15064.5(a). These provisions of CEQA create three categories of historical resources: mandatory historical resources; presumptive historical resources; and resources that may be found historical at the discretion of the lead agency. These categories are described below.

- **Mandatory Historical Resources.** A resource the State Historical Resources Commission lists on the CRHR, or the State Historical Resources Commission determines to be eligible for listing in the CRHR, is defined by CEQA to be a historical resource. Resources are formally listed or determined eligible for listing by the State Historical Resources Commission in accordance with the procedures set forth in the provisions of state law relating to listing of historical resources.³⁴ If a resource has been listed in the CRHR, or formally determined to be eligible for listing by the State Historical Resources Commission under these procedures, it is conclusively presumed to be a historical resource under CEQA.
- **Presumptive Historical Resources.** A resource included in a local register of historic resources as defined by state law³⁵ or identified as significant in a historical resource survey meeting the requirements of state law,³⁶ shall be presumed to be historically or culturally significant. The lead agency must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
- **Discretionary Historical Resources.** A resource that is not determined to be a significant historical resource under the criteria described above, may, in the discretion of the lead agency, be found to be a significant historical resource for purposes of CEQA, provided its determination is supported by substantial evidence in light of the whole record. The CEQA Guidelines further provide that generally, a lead agency should consider a resource historically significant if the resource is found to meet the criteria for listing on the CRHR, including the following:
 - Criterion 1 (Events): The resource is associated with events or patterns of events that have made a significant contribution to the broad patterns of local or regional history and cultural heritage of California or the United States; or
 - Criterion 2 (Persons): The resource is associated with the lives of persons important to local, California, or national history; or
 - Criterion 3 (Architecture): The resource embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values, or
 - Criterion 4 (Information Potential): The resource has the potential to yield information important to the prehistory or history of the local area, California, or the nation.³⁷

Historical resources eligible for listing in the CRHR must meet one of the criteria of significance described above and retain enough of their historic character or appearance to be recognizable as

³⁴ Set forth in Public Resources Code Section 5024.1 and 14 California Code of Regulations (CCR) Section 4850, et. seq.

³⁵ Set forth in Public Resources Code Section 5020.1(k), a local register of historical resources is a list of properties officially designated or recognized as historically significant by a local government pursuant to a local ordinance or resolution.

³⁶ Under Public Resources Code Section 5024.1(g), a resource can be identified as significant in a historical resources survey and found to be significant by the State Office of Historic Preservation (i.e., listed in the CRHR) if three criteria are met: (1) the survey has or will be included in the State Historic Resources Inventory; (2) the survey and documentation were prepared in accordance with State Office of Historic Preservation procedures and requirements; and (3) the State Office of Historic Preservation has determined the resource has a significance rating of Category 1 to 5 on Form 523.

³⁷ CEQA Guidelines Section 15064.5(a)(3) and California Office of Historic Preservation Technical Assistance Series #6. Accessed October 24, 2022.

<http://www.ohp.parks.ca.gov/pages/1069/files/technical%20assistance%20bulletin%206%202011%20update.pdf>.

historical resources and to convey the reasons for their significance. A resource that has lost its historic character or appearance may still have sufficient integrity for the CRHR if it maintains the potential to yield significant scientific or historical information or specific data.

The concept of integrity is essential to identifying the important physical characteristics of historical resources and in evaluating adverse changes to them. Integrity is defined as “the authenticity of a historical resource’s physical identity evidenced by the survival of characteristics that existed during the resource’s period of significance.” The process of determining integrity is similar for both the California and National Registers, and the same seven variables or aspects to define integrity are used to evaluate a resource’s eligibility for listing. These seven characteristics include: 1) location, 2) design, 3) setting, 4) materials, 5) workmanship, 6) feeling, and 7) association.

Senate Bill 18

The intent of SB 18 is to aid in the protection of traditional tribal cultural places through local land use planning by requiring city governments to consult with California Native American tribes on projects which include adoption or amendment of general plans (defined in Government Code Section 65300 et seq.) and specific plans (defined in Government Code Section 65450 et seq.). SB 18 requires local governments to consult with tribes prior to making certain planning decisions and to provide notice to tribes at certain key points in the planning process.

Assembly Bill 52

AB 52, effective July 2015, established a new category of resources for consideration by public agencies called Tribal Cultural Resources (TCRs). AB 52 requires lead agencies to provide notice of projects to tribes that are traditionally and culturally affiliated with the geographic area if they have requested to be notified. Where a project may have a significant impact on a tribal cultural resource, consultation is required until the parties agree to measures to mitigate or avoid a significant effect on a tribal cultural resource or until it is concluded that mutual agreement cannot be reached.

Under AB 52, TCRs are defined as follows:

- Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are also either:
 - Included or determined to be eligible for inclusion in the California Register of Historic Resources, or
 - Included in a local register of historical resources as defined in Public Resources Code Section 5020.1(k).
- A resource determined by the lead agency to be a TCR.

California Native American Historical, Cultural, and Sacred Sites Act

The California Native American Historical, Cultural, and Sacred Sites Act applies to both state and private lands. The act requires that upon discovery of human remains, construction or excavation activity must cease and the county coroner be notified.

Public Resources Code Sections 5097 and 5097.98

Section 15064.5 of the CEQA Guidelines specifies procedures to be used in the event of an unexpected discovery of Native American human remains on non-federal land. These procedures are outlined in Public Resources Code Sections 5097 and 5097.98. These codes protect such remains from disturbance, vandalism, and inadvertent destruction, establish procedures to be implemented if Native American skeletal remains are discovered during construction of a project, and establish the Native American Heritage Commission (NAHC) as the authority to resolve disputes regarding disposition of such remains.

Pursuant to Public Resources Code Section 5097.98, in the event of human remains discovery, no further disturbance is allowed until the county coroner has made the necessary findings regarding the origin and disposition of the remains. If the remains are of a Native American, the county coroner must notify the NAHC. The NAHC then notifies those persons most likely to be related to the Native American remains. The code section also stipulates the procedures that the descendants may follow for treating or disposing of the remains and associated grave goods.

Local

City of San Bruno General Plan

Various policies in the City's General Plan have been adopted for the purpose of avoiding or mitigating cultural impacts resulting from planned development within the City, including the following:

Policies	Description
ERC-F	Preserve and enhance historic and cultural resources within the city, particularly within the historic Downtown area.
ERC-36	Preserve historic structures and resources during reuse and intensification within the city's older neighborhoods.
ERC-37	Designate the vicinity of Taylor Avenue, San Mateo Avenue, and El Camino Real as the beginning of the State Highway System as a historic landmark with a marker (Figure 6-2).
ERC-38	Work cooperatively with the owners of The Shops at Tanforan to preserve the historic marker on site (Figure 6-2).
ERC-39	Continue to protect archaeological sites and resources from damage. Require that areas found to contain significant indigenous artifacts be examined by a qualified archaeologist for recommendations concerning protection and preservation.
ERC-40	Ensure that new development adjacent to historic structures is compatible with the character of the structure and the surrounding neighborhood.
ERC-42	If demolition of a historical building is necessary for safety reasons, attempt to preserve the building façade for adaptive reuse during reconstruction. Offer funding through the Redevelopment Agency for façade preservation projects.
ERC-44	If, prior to grading or construction activity, an area is determined to be sensitive for paleontological resources, retain a qualified paleontologist to recommend appropriate actions. Appropriate action may include avoidance, preservation in place, excavation, documentation, and/or data recovery, and shall always include preparation of a written report documenting the find and describing steps taken to evaluate and protect significant resources.

Bayhill Specific Plan

As noted in Section 3.1.1.1, Housing Opportunity Sites 3 and 13 are located within the Bayhill Specific Plan area. Chapter Six of the Bayhill Specific Plan includes mandatory “Environmental Quality Policies”, including the following which pertain to cultural resources.

Policy 6-27

Policy 6-27 requires preparation of an Archaeological Monitoring Plan (AMP) by a qualified professional archaeologist prior to any project-related ground disturbance that outlines areas of archaeological sensitivity, if any, and includes protocol to follow if unanticipated archaeological or tribal cultural resources are encountered.

Policy 6-28

Policy 6-28 requires construction contractors to be trained in recognizing archaeological and tribal cultural resources.

Policy 6-29

Policy 6-29 requires all work to stop immediately if archaeological or tribal cultural resources are discovered during construction.

Policy 6-30

Policy 6-30 includes similar protections for human remains of Native American origin discovered during construction.

4.5.1.2 *Existing Conditions*

Archaeological Resources

Archaeological resources are traces of human occupation and activity. In Northern California, human occupation extends back to at least 9,000-11,500 years with Native American occupation and use of the Bay Area extending over 5,000-8,000 years and possibly longer. Native Americans at the time of Euro-American contact tended to live along the alluvial terraces and along historic Bay margins, there is potential for the discovery of Native American cultural resources within the City. Native American cultural resources have also been found in San Mateo County near sources of fresh water, including streams and creeks.

General Plan and Municipal Code Conforming Sites

Residential development at the densities proposed by the Housing Element Update (refer to Table 3.2 1) are allowed at Housing Opportunity Sites 6, 8, 10, 16, 18, and 19 under their existing General Plan land use designation and zoning designation, and therefore no General Plan amendments or rezoning is required. The existing conditions at these sites related to archaeological resources are discussed below.

Housing Opportunity Site 6

Housing Opportunity Site 6 is currently developed with multiple uses, including a privately operated golf driving range, parking lot storage for a private bus operator, and a maintenance building for the San Bruno Park School District. As discussed in Section 4.4.1.2, San Bruno Creek is located adjacent west of Site 6, indicating a moderate sensitivity for prehistoric archaeological resources.

Housing Opportunity Site 8

Housing Opportunity Site 8 is currently developed with the former Edgemont Elementary School campus. Site 8 is not adjacent to any waterways and has been extensively developed, and therefore has a low sensitivity for archaeological resources.

Housing Opportunity Sites 10 and 16

Housing Opportunity Sites 10 and 16 are vacant dirt lots that are located adjacent to each other on San Marco Avenue in an urbanized area developed with mostly single-family residential development and various commercial uses along the El Camino Real corridor to the immediate west of the sites. Based on historic aerials, Sites 10 and 16 have previously been developed with single-family residential uses.³⁸

Due to the proximity of Sites 10 and 16 to historic Bay margins, the sites have a moderate sensitivity for archaeological resources. According to Figure 6-2 of the General Plan (refer to Figure 4.5-2), there are known historic resources in the vicinity of Sites 10 and 16, and therefore there is the potential for historic-era archaeological resources to be present at these sites.

Housing Opportunity Site 18

Housing Opportunity Site 18 is developed with a two-story office building. Although Site 18 has previously been developed, its proximity to the historic extent of San Bruno Creek and historic Bay margins suggests a moderate sensitivity for archaeological resources. In addition, Site 18 is located west opposite El Camino Real from the historic location of the (since demolished) Japanese-American Tanforan Assembly Center, discussed below under Site 14, and therefore may contain historic-era archaeological resources.

Housing Opportunity Site 19

Housing Opportunity Site 19 is developed with a single-story building and surface parking lot. Although Site 19 has previously been developed, its proximity to the historic extent of San Bruno Creek and historic Bay margins suggests a moderate sensitivity for archaeological resources. In addition, Site 19 is located west opposite El Camino Real from the historic location of the (since demolished) Japanese-American Tanforan Assembly Center, discussed below under Site 14, and therefore may contain historic-era archaeological resources.

³⁸ Historic Aerials by NetrOnline. "Historic Aerials Viewer". Accessed September 12, 2022. <https://www.historicaerials.com/viewer>.

Transit Corridors Plan Area Sites

As noted in Section 3.1.1.1, Housing Opportunity Sites 1, 2, 4, 5, 7, 9, 11, 12, 15, 17, 20, 21, 22, and 23 are located within the TCP area. According to the San Bruno TCP EIR, numerous Native American resources have been recorded in the general vicinity, and the three creeks that historically traversed the TCP area, and the area's location along the Bay margin, indicate that the TCP area has a high archaeological sensitivity.

Based on a March 2003 Historic Resources Inventory of the San Bruno Redevelopment Project Area (refer to Figure 4.5-2), there are 10 historical resources within the TCP area and four historical resources immediately adjacent to the TCP area. Sites within the TCP area are sensitive for historic-era archaeological resources.

Bayhill Specific Plan Area Sites

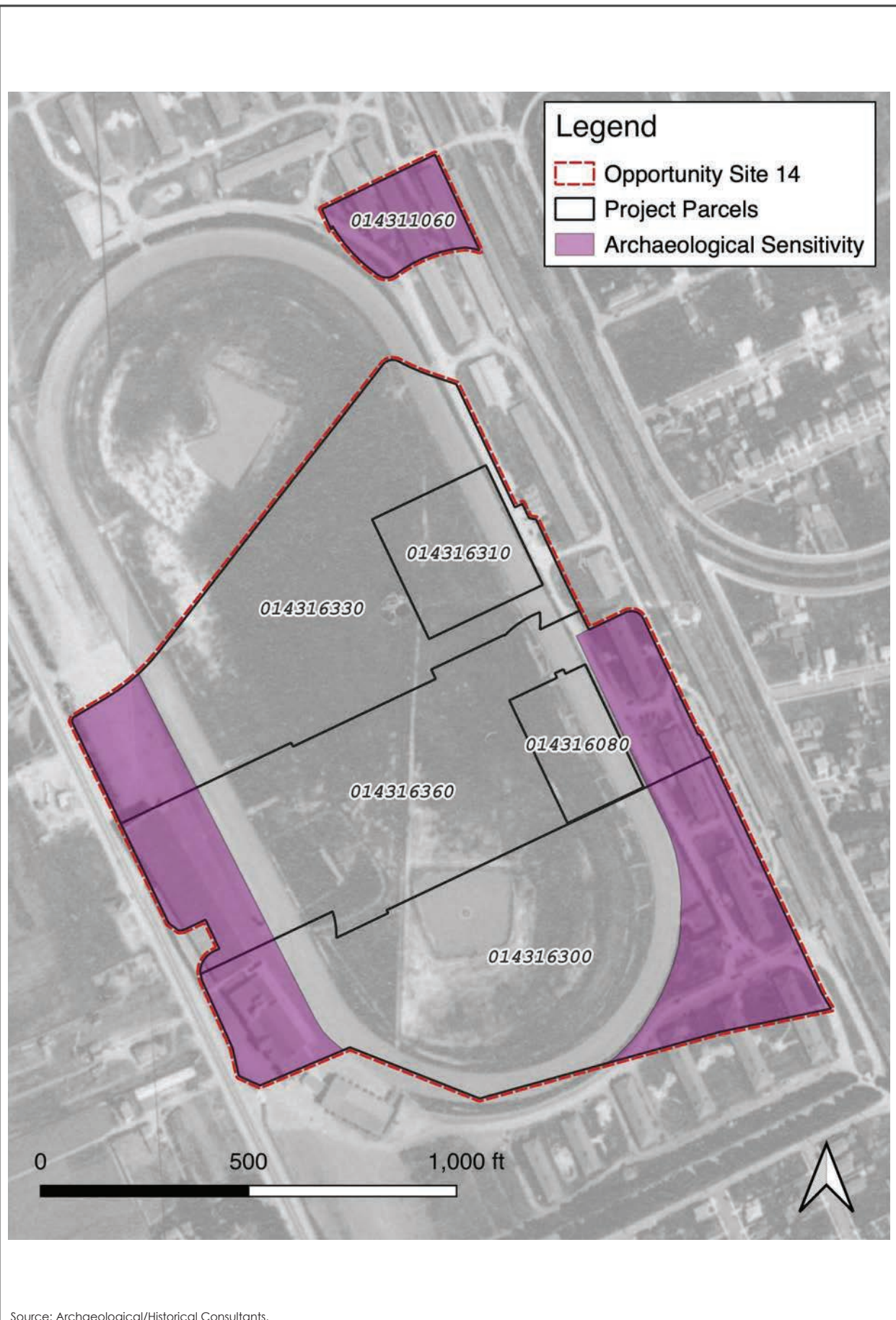
As noted in Section 3.1.1.1, Housing Opportunity Sites 3 and 13 are located within the Bayhill Specific Plan area. According to the Bayhill Specific Plan EIR, there are four previously recorded pre-contact habitation sites, and the historic extent of San Bruno Creek intersected the Bayhill Specific Plan area. As a result, sites within the Bayhill Specific Plan area are sensitive for undiscovered prehistoric and historic-era archaeological resources.

Housing Opportunity Site 14

Housing Opportunity Site 14 consists of 1122-1188 El Camino Real/300 Tanforan Shopping Center, which is developed with the Shops at Tanforan shopping mall, and 1292 Huntington Avenue, which is located opposite the Shops at Tanforan across the Sneath Lane/Huntington Avenue intersection and is developed with a vacant paved lot.

Historically, Site 14 was used for horse raising and grazing since the early days of the Spanish occupation on the Peninsula. Site 14 lies within the former Tanforan Racetrack complex, which opened in 1899 and held races of all types, from horse races to races between cars and airplanes, before it burned down in 1964. The Tanforan Racetrack was the takeoff site of the first flight ever on the West Coast and the first ever aircraft carrier takeoff and landing in 1911, from the U.S.S. Pennsylvania. During World War II, the Tanforan Racetrack was converted into the Tanforan Assembly Center, a detention camp for Japanese Americans. The Tanforan Assembly Center was one of 13 temporary detention camps in California and is a Registered Historic Landmark, #934. Though the racetrack and associated buildings were removed when the site was redeveloped as a shopping mall in 1971, all of the parcels within Site 14 are located within the mapped area of the Tanforan Assembly Center.

The Cultural Resources Sensitivity Report concluded that Site 14 has a low sensitivity for prehistoric-era archaeological resources due to lack of nearby waterways and the fact that the nearest archaeological resource recovery site is located over 2,000 feet away. Due to Site 14's association with the Tanforan Racetrack and Tanforan Assembly Center, the areas shown on Figure 4.5-1 are sensitive for historic-era archaeological resources.



AREAS SENSITIVE FOR HISTORIC-ERA ARCHAEOLOGICAL RESOURCES

FIGURE 4.5-1

Historic Resources

In March 2003, the City conducted a Historic Resources Inventory which mapped historic resources within the Redevelopment Area (refer to Figure 3-1 in the General Plan), which encompassed all Housing Opportunity Sites with the exception of Sites 3, 6, and 13. Figure 4.5-2 of this Initial Study shows the location of all mapped historic resources within the Redevelopment Area relative to the Housing Opportunity Sites.

General Plan and Municipal Code Conforming Sites

As shown on Figure 4.5-2, there are no historic resources present on Housing Opportunity Sites 6, 8, 10, 16, 18, and 19; however, several historic buildings are located between 250 to 650 feet from Sites 10 and 16.

Transit Corridors Plan Area Sites

As discussed above, a March 2003 Historic Resources Inventory of the San Bruno Redevelopment Project Area identified 10 listed historical resources within the Transit Corridors Area and 4 listed historical resources immediately adjacent to the Transit Corridors Area. As shown Figure 4.5-2, there are no historic resources present on Housing Opportunity Sites 1, 2, 4, 5, 7, 9, 11, 12, 15, 17, 20, 22 and 23. At the time of the Historic Resources Inventory, the building located on Site 21 was identified as a historic resource; this building was demolished in 2008. As such, there is no longer a historic resource present at Site 21.

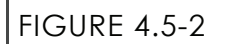
Bayhill Specific Plan Area Sites

As noted in Section 3.1.1.1, Housing Opportunity Sites 3 and 13 are located within the Bayhill Specific Plan area. According to the Bayhill Specific Plan EIR, none of the existing buildings within the Bayhill Specific Plan area are eligible for listing or listed on any federal, state, or local register of historic resources.

Housing Opportunity Site 14

As discussed above, Site 14 consists of 1122-1188 El Camino Real/300 Tanforan Shopping Center, which is developed with the Shops at Tanforan shopping mall, and 1292 Huntington Avenue, which is located opposite the Shops at Tanforan across the Sneath Lane/Huntington Avenue intersection and is developed with a vacant paved lot. The original Shops at Tanforan development was originally constructed in 1971; it underwent major renovations in 2005 which included a new entrance and expansion at the west elevation and extensive tenant improvements to the Century Theatre and associated parking lot (1188 El Camino Real) were added in 2007.

As discussed previously in this section, during World War II, the Tanforan Racetrack was converted into the Tanforan Assembly Center, a detention camp for Japanese Americans. The Tanforan Assembly Center was one of 13 temporary detention camps in California and is a California Historic Landmark (#934.09). The racetrack and associated buildings were removed when the site was redeveloped as a shopping mall in 1971. The listing of the site as a California Historic Landmark #934.09 is commemorative, given none of the features related to the Tanforan Assembly Center remain, i.e. no integrity exists for historic resources related to the center.



California Historic Landmark #934.09 is identified by the Tanforan Assembly Center Private Marker located at 1150 El Camino Real in front of the western entrance to the Shops at Tanforan.

At the time of the 2003 Historic Resources Inventory (which occurred prior to the 2005 renovations), the Shops at Tanforan development was less than 50 years in age, and found to be ineligible for listing on any federal, state, or local register of historic resources. The Shops at Tanforan are now greater than 50 years in age, although extensive alterations and new construction have occurred over time that have altered the integrity of the site from its 1971 condition. As shown on Figure 4.5-2, Site 14 is not located within a historic district.

4.5.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
1) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact CUL-1: The project would not cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5. (**Less than Significant Impact with Mitigation Incorporated**)

As discussed in Section 4.5.1.2, a Historic Resources Inventory was prepared in March 2003 which mapped historic resources within the Redevelopment Area (refer to Figure 3-1 in the General Plan), which encompassed all Housing Opportunity Sites with the exception of Sites 3, 6, and 13. Of the Housing Opportunity Sites mapped, only Site 21 was developed with a historic resource. This resource was subsequently demolished in 2008.

As discussed in Section 4.5.1.2, Site 14 is the former site of the Tanforan Assembly Center, California Historic Landmark #934.09, which commemorates the historic use of the site as a detention camp for Japanese Americans during World War II. None of the features related to the Tanforan Assembly Center remain. California Historic Landmark #934.09 is identified by the Tanforan Assembly Center Private Marker located at 1150 El Camino Real in front of the western entrance to the Shops at Tanforan. The site is currently developed with the Shops at Tanforan development, which was not identified as a historic resource in the 2003 Historic Resource Inventory or mapped within a historic district, as the current development dates from 1971. Properties under 50 years in age must be of ‘exceptional importance’ in order to be eligible for listing as a historic resource. In 2003, the Shops at Tanforan were 32 years old, and were not found to constitute an

historic resource as part of the 2003 inventory. Although the Shops at Tanforan were not identified as historic in the 2003 inventory and subsequently underwent major renovations in 2005, the Shops at Tanforan are now more than 50 years old and may now be eligible under the criteria for properties greater than 50 years in age (refer to Section 4.1.1.1).

It is reasonably foreseeable that future development proposals for redevelopment of Site 14 with residential uses may entail the demolition of the Shops at Tanforan and/or the removal of California Historic Landmark #934.09, or the construction of development around Shops at Tanforan that could reduce its potential historic significance.

Mitigation Measures:

MM CUL-1.1: Prior to approval, the 2023-2031 Housing Element shall include a policy requiring future development at Housing Opportunity Site 14 to comply with the following measures:

- a. Removal or alteration of the commemorative features of California Historic Landmark #934 shall be prohibited, and must be incorporated into any future development proposals for Site 14.
- b. As part of the future project-level CEQA analysis of any discretionary permit that would allow the demolition of the existing buildings located at Site 14, a Historic Resource Evaluation (HRE) shall be prepared by a qualified architect or architectural historian approved by the City and meeting the Secretary of the Interior's Professional Qualifications Standards published in the Code of Federal Regulations (36 CFR part 61). The HRE shall evaluate whether any of the existing buildings meet the definition of a historic resource pursuant to CEQA Guidelines Section 15064.5. If the existing buildings do not meet the definition of a historic resource, demolition may proceed. If the HRE finds that any of the existing buildings at Site 14 meet the definition of a historic resource, demolition of buildings eligible for listing as a historic resource shall be prohibited.
- c. In the event that any buildings meeting the definition of a historic resource pursuant to CEQA Guidelines Section 15064.5 are identified, future development proposals for Site 14 shall be reviewed for compliance by a qualified architect or architectural historian approved by the City and meeting the Secretary of the Interior's Professional Qualifications Standards published in the Code of Federal Regulations (36 CFR part 61) with one or both of the following standards prior to issuance of any discretionary permits that would allow modifications to the existing buildings or new construction on Site 14:
 - Secretary of Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings; or

- Secretary of Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), Weeks and Grimmer.

Implementation of MM CUL-1.1 would ensure that prior to any activities which could cause a substantial adverse change in the significance of any historic resources that may be present at the Shops at Tanforan development located on Site 14, a Historic Resources Evaluation would be prepared that determines whether any of the existing buildings at Site 14 meet the definition of a historic resource pursuant to CEQA Guidelines Section 15064.5. Demolition, modification, or construction activities which could adversely affect the significance any buildings eligible for listing as a historic resource would require the completion of project-level CEQA review, including consideration of preservation and adaptive reuse alternatives. Therefore, implementation of the Housing Element as amended by MM CUL-1.1 would ensure that future redevelopment of Site 14 would not cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5.

Impact CUL-2: The project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5.
(Less than Significant Impact with Mitigation Incorporated)

General Plan and Municipal Code Conforming Sites

As documented in Section 4.5.1.2, Sites 6, 10, 16, 18, and 19 are sensitive for prehistoric- and/or historic-era archaeological resources. While Site 8 has a low sensitivity for either prehistoric- or historic-era archaeological resources, the potential remains for archaeological resources to be encountered during ground-disturbing activities associated with future development at Site 8 and Sites 6, 10, 16, 18, and 19.

Mitigation Measures:

- MM CUL-2.1:** Prior to approval, the 2023-2031 Housing Element shall include a policy requiring future development at Housing Opportunity Sites 6, 8, 10, 16, 18, and 19 to comply with the following measures:
- a. If evidence of an archaeological site or other suspected cultural resource as defined by CEQA Guideline Section 15064.5, including darkened soil representing past human activity (“midden”), that could conceal material remains (e.g., worked stone, worked bone, fired clay vessels, faunal bone, hearths, storage pits, or burials) is discovered during construction related earth-moving activities, all ground-disturbing activity within 100 feet of the resources shall be halted and the City Planning Manager shall be notified. The project sponsor shall hire a qualified archaeologist to conduct a field investigation. The City’s Planning Manager shall consult with the archaeologist to assess the significance of the find. Impacts to any significant resources shall be mitigated to a less-than-significant level through data recovery or other methods determined adequate by a

qualified archaeologist and that are consistent with the Secretary of the Interior's Standards for Archaeological documentation. Any identified cultural resources shall be recorded on the appropriate DPR 523 (A-J) form and filed with the NWIC.

- b. Prior to the initiation of any site preparation and/or the start of construction, the project sponsor shall ensure that all construction workers receive training overseen by a qualified professional archaeologist who is experienced in teaching non-specialists, to ensure that contractors can recognize archaeological resources in the event that any are discovered during construction.

With implementation of MM CUL-2.1, any undiscovered subsurface archaeological resources encountered during construction would be identified, evaluated and appropriately treated in accordance with the recommendations of a qualified archaeologist. Accordingly, the buildout of Housing Opportunity Sites 6, 8, 10, 16, 18, and 19 would not cause a substantial adverse change in the significance of an archaeological resource. **(Less than Significant Impact with Mitigation Incorporated)**

Transit Corridors Plan Area Sites

As discussed in Section 4.5.1.2, the TCP EIR concluded that the TCP area (which encompasses Housing Opportunity Sites 1, 2, 4, 5, 7, 9, 11, 12, 15, 17, 20, 22 and 23) is sensitive for prehistoric- and historic-era archaeological resources. Future development at the Housing Opportunity Sites within the TCP area would be required to adhere to the following mitigation measure imposed by the TCP EIR.

- **TCP Mitigation Measure 7-1:** If prehistoric or historic-period archaeological resources are encountered during future grading or excavation in the Transit Corridors Area, work shall avoid altering the materials and their context until a qualified professional has evaluated, recorded and determined appropriate treatment of the resource, in consultation with the City. Project personnel shall not collect cultural resources. Cultural resources shall be recorded on DPR 523 historic resource recordation forms. If it is determined that the proposed development could damage a unique archaeological resource, mitigation shall be implemented in accordance with Public Resources Code Section 21083.2 and Section 15126.4 of the CEQA Guidelines, with a preference for preservation in place.

The Housing Element Update would not change any of the development assumptions of the TCP EIR, which concluded that implementation of the above mitigation measures would reduce potential impacts to prehistoric- and historic-era archaeological resources to a less than significant level. Accordingly, buildout of the Housing Opportunity Sites within the TCP area would have a less than significant impact on archaeological resources with adherence to TCP Mitigation Measure 7-1 as required by the TCP EIR. **(Less than Significant Impact with Mitigation Incorporated)**

Bayhill Specific Plan Area Sites

Housing Opportunity Sites 3 and 13 are located within the Bayhill Specific Plan area. Future development within the Bayhill Specific Plan area would be required to comply with the General

Plan and Bayhill Specific Plan policies identified in Section 4.5.1.1, specifically, General Plan Policy ERC-39 and Bayhill Specific Plan policies 6-27, 6-28, and 6-29. Prior to any project-related ground disturbance, Policies 6-27 and 6-28 require construction contractors to be trained in recognizing archaeological and tribal cultural resources, and preparation of an AMP by a qualified professional archaeologist prior to any project-related ground disturbance that outlines areas of archaeological sensitivity, if any, and includes protocol to follow if unanticipated archaeological or tribal cultural resources are encountered. Policy 6-29 requires all work to stop immediately if archaeological or tribal cultural resources are discovered during construction, and Policy ERC-39 requires areas found to contain significant indigenous artifacts be examined by a qualified archaeologist for recommendations concerning protection and preservation. Adherence with the aforementioned policies would ensure that any undiscovered subsurface archaeological resources encountered during construction would be identified, evaluated and appropriately treated in accordance with the recommendations of a qualified archaeologist. Accordingly, the buildout of Housing Opportunity Sites 3 and 13 would not cause a substantial adverse change in the significance of an archaeological resource. **(Less than Significant Impact)**

As discussed in Section 4.5.1.2, the Cultural Resources Sensitivity Report concluded that Site 14 has a low sensitivity for prehistoric-era archaeological resources, but is sensitive for historic-era archaeological resources associated with the Tanforan Racetrack and Tanforan Assembly Center in the areas shown on Figure 4.5-1. Ground-disturbing activities associated with future development of Site 14 have the potential to encounter and destroy undiscovered subsurface prehistoric and historic-era archaeological resources, if present on site.

Mitigation Measures:

MM CUL-2.2: Prior to approval, the 2023-2031 Housing Element shall include a policy requiring future development at Housing Opportunity Site 14 to comply with the following measures:

- a. As part of the future project-level CEQA analysis of any discretionary permits that would allow ground-disturbing activities (e.g., grading, trenching, excavation, etc.) in the archaeological sensitive areas shown on Figure 4.5-1, exploratory trenching shall be conducted by a qualified archaeologist trained in both local prehistoric and historical archaeology within the proposed area of effect to determine if prehistoric- or historic-era archaeological resources are present. Explorations shall consist of at least one mechanically dug trench with excavation depths commensurate with the depth of proposed ground-disturbing activities. If any archaeological resources are exposed, these should be briefly documented, tarped for protection, and left in place. The results of the exploratory trenching shall be submitted to the Director of Community and Economic Development or the Director's designee. If it is determined by the project archaeologist that the proposed activities could damage an archaeological resource or that indications of other suspected archaeological resources are present (i.e., darkened soil "midden" representing past human activity), an Archaeological Resources Treatment Plan shall be prepared as described in MM CUL-2.1b below.

- b. If recommended by the project archaeologist, an Archaeological Resources Treatment Plan shall be prepared by the project archaeologist that contains, at minimum:
- Identification of the scope of work and range of subsurface effects (including location map and development plan), including requirements for preliminary field investigations.
 - Description of the environmental setting (past and present) and the historic/prehistoric background of the parcel (potential range of what might be found).
 - Monitoring schedules and individuals
 - Development of research questions and goals to be addressed by the investigation (what is significant vs. what is redundant information).
 - Detailed field strategy to record, recover, or avoid the finds and address research goals.
 - Analytical methods.
 - Report structure and outline of document contents.
 - Disposition of the artifacts.
 - Security approaches or protocols for finds.
 - Appendices: all site records, correspondence, and consultation with Native Americans, etc.

Implementation of the treatment plan by the project archaeologist shall be required prior to the issuance of any permits related to ground-disturbing activities. The treatment plan shall utilize data recovery methods to reduce impacts on subsurface resources. The treatment plan shall be submitted to the Director of Community and Economic Development or the Director's designee, along with a summary of the outcomes of the treatment plan and all associated documentation and recordation.

MM CUL-2.3: Prior to approval, the 2023-2031 Housing Element shall include a policy requiring future development at Housing Opportunity Site 14 to comply with the following measures:

- a. Prior to the issuance of any discretionary permits that would allow ground-disturbing activities (e.g., grading, trenching, excavation, etc.) within the non-sensitive areas mapped on Figure 4.5-1, the project applicant shall hire a qualified archaeologist to develop a Worker's Environmental Awareness Program (WEAP) to train the construction crew on the legal requirements for the treatment of cultural resources as well as procedures to follow in the event of a cultural resources discovery. This training program shall be given to the crew before ground disturbing work commences and shall include handouts to be given to new workers.

- b. The applicant shall note on all construction plans that require ground disturbing activities that there is a potential for exposing buried cultural resources including prehistoric Native American burials.
- c. In the event that potentially significant archaeological resources are encountered during ground-disturbing activities occurring at Site 14, all activity within a 50-foot radius of the find shall be stopped, the Director of Community and Economic Development or the Director's designee shall be notified, and the project archaeologist shall examine the find. The project archaeologist shall (1) evaluate the find(s) to determine if they meet the definition of an archaeological resource; and (2) make appropriate recommendations regarding the disposition of such finds prior to issuance of building permits. Recommendations could include collection, recordation, and analysis of any significant cultural materials. A report of findings documenting any data recovery shall be submitted to the Director of Community and Economic Development or the Director's designee and the Northwest Information Center (if applicable).

Implementation of MM CUL-2.1a would require exploratory trenching to be conducted prior to any future development proposed within the archaeologically sensitive areas shown on Figure 4.5-1. If any archaeological resources or indications of archaeological resources are identified, MM CUL-2.1b would require preparation of an Archaeological Resources Treatment Plan that would ensure all archaeological resources present in the archaeologically sensitive areas of Site 14 that could be affected by future development are identified, evaluated, and appropriately treated in accordance with the recommendations of a qualified archaeologist and the requirements of CEQA.

Although it is unlikely that undiscovered subsurface archaeological resources are present in the non-sensitive areas of Site 14 shown on Figure 4.5-1, implementation of MM CUL-2.2a and 2.2b would ensure workers are alerted to the potential presence of archaeological resources and trained to follow the proper procedures in the event of a discovery. MM CUL-2.2c would ensure that any resources encountered are identified, evaluated, and appropriately treated in accordance with the recommendations of a qualified archaeologist and the requirements of CEQA.

For the reasons outlined above, implementation of the Housing Element as amended by MM CUL-2.1 and MM CUL-2.2 would ensure that future residential development at Site 14 does not cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5.

Impact CUL-3: The project would not disturb any human remains, including those interred outside of dedicated cemeteries. **(Less than Significant Impact with Mitigation Incorporated)**

Housing Opportunity Sites 1, 2, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 20, 22 and 23

Human graves are most often associated with prehistoric occupation sites. As discussed in Section 4.5.1.2 Existing Conditions, no known prehistoric sites are present at any of the Housing Opportunity Sites. However, the potential exists for human remains, including Native American remains, to be

unearthed during future development under the Housing Element Update, specifically during ground-disturbing activities (e.g., grading, trenching, excavation, etc.).

Mitigation Measures:

- MM CUL-3.1:** Prior to approval, the 2023-2031 Housing Element shall include a policy requiring future development at Housing Opportunity Sites 1, 2, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 20, 22 and 23 to comply with the following measures:
- a. If human remains are discovered at any project construction site during any phase of construction, all ground-disturbing activity within 100 feet of the resources shall be halted and the City's Planning Manager and the San Mateo County Coroner shall be notified immediately, according to Section 5097.98 of the State Public Resources Code and Section 7050.5 of California's Health and Safety Code. If the remains are determined by the County coroner to be Native American, the Native American Heritage Commission (NAHC) shall be notified within 24 hours, and the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains. The project sponsor shall also retain a professional archaeologist with Native American burial experience to conduct a field investigation of the specific site and consult with the Most Likely Descendant, if any, identified by the NAHC. As necessary, the archaeologist may provide professional assistance to the Most Likely Descendant, including the excavation and removal of the human remains. The City of San Bruno shall be responsible for approval of recommended mitigation as it deems appropriate, taking account of the provisions of State law, as set forth in CEQA Guidelines section 15064.5(e) and Public Resources Code section 5097.98. The project sponsor shall implement approved mitigation, to be verified by the City of San Bruno, before the resumption of ground-disturbing activities within 100 feet of where the remains were discovered.

Implementation of MM CUL-3.1 would ensure that any human remains encountered during future development are subject to timely identification, analysis, documentation, and removal in accordance with state and local laws. Therefore, implementation of the Housing Element as amended by MM CUL-3.1 would ensure that future residential development at Sites 1, 2, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 20, 22 and 23 would not disturb any human remains.

Bayhill Specific Plan Area Sites

Housing Opportunity Sites 3 and 13 are located within the Bayhill Specific Plan area. Future development within the Bayhill Specific Plan area would be required to comply with the Specific Plan policies identified in Section 4.5.1.1, specifically, Policy 6-30. If human remains are encountered during construction, Policy 6-30 requires construction activities in the area of discovery and surrounding vicinity to cease until the county coroner has been notified and all applicable legal requirements have been implemented. If human remains of Native American origin are discovered during ground-disturbing activities, construction contractors are required to comply with state laws

regarding the disposition of Native American burials, which fall within the jurisdiction of the Native American Heritage Commission as required by Public Resources Code Section 5097. Adherence with Policy 6-30 as required by the Bayhill Specific Plan would ensure that any human remains encountered during future development at Sites 3 and 13 are subject to timely identification, analysis, documentation, and removal in accordance with state and local laws. Accordingly, buildout of Sites 3 and 13 would not disturb human remains. **(Less than Significant Impact).**

4.6 ENERGY

The following discussion is based, in part, on an Air Quality and Greenhouse Gas Assessment prepared for the Housing Element Update by Illingworth & Rodkin, Inc. A copy of this report, dated September 2022, is attached to this Initial Study as Appendix A.

4.6.1 Environmental Setting

4.6.1.1 *Regulatory Framework*

Federal and State

Energy Star and Fuel Efficiency

At the federal level, energy standards set by the EPA apply to numerous consumer products and appliances (e.g., the EnergyStar™ program). The EPA also sets fuel efficiency standards for automobiles and other modes of transportation.

Renewables Portfolio Standard Program

In 2002, California established its Renewables Portfolio Standard Program, with the goal of increasing the percentage of renewable energy in the state's electricity mix to 20 percent of retail sales by 2010. Governor Schwarzenegger issued Executive Order (EO) S-3-05, requiring statewide emissions reductions to 80 percent below 1990 levels by 2050. In 2008, EO S-14-08 was signed into law, requiring retail sellers of electricity serve 33 percent of their load with renewable energy by 2020. In October 2015, Governor Brown signed SB 350 to codify California's climate and clean energy goals. A key provision of SB 350 requires retail sellers and publicly owned utilities to procure 50 percent of their electricity from renewable sources by 2030. SB 100, passed in 2018, requires 100 percent of electricity in California to be provided by 100 percent renewable and carbon-free sources by 2045.

Executive Order B-55-18 To Achieve Carbon Neutrality

In September 2018, Governor Brown issued an executive order, EO-B-55-18 To Achieve Carbon Neutrality, setting a statewide goal "to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter." The executive order requires CARB to "ensure future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal." EO-B-55-18 supplements EO S-3-05 by requiring not only emissions reductions, but also that, by no later than 2045, the remaining emissions be offset by equivalent net removals of CO₂ from the atmosphere through sequestration.

California Building Standards Code

The California Building Energy Efficiency Standards (California Energy Code) is under Title 24, Part 6 and is overseen by the California Energy Commission (CEC). This code includes design requirements to conserve energy in new residential and non-residential developments, while being cost effective for homeowners. The Energy Code is enforced and verified by cities during the planning and building permit process. The current energy efficiency standards (2019 Energy Code) replaced the 2016 Energy Code as of January 1, 2020.

The California Green Building Standards Code (CALGreen Code) is part of the California Building Standards Code under Title 24, Part 11. The CALGreen Code provides sustainable construction standards that involve planning/design, energy efficiency, water efficiency resource efficiency, and environmental quality. These green building standard codes are mandatory statewide and are applicable to residential and non-residential developments. The most recent CALGreen Code (2019 California Building Standard Code) was effective as of January 1, 2020.

Requirements for electric vehicle (EV) charging infrastructure are set forth in Title 24, Part 11 of the California Code of Regulations and are regularly updated on a 3-year cycle. The CALGreen standards consist of a set of mandatory standards required for new development, as well as two more voluntary standards known as Tier 1 and Tier 2. The CalGreen standards have recently been updated (2022 version) to require deployment of additional EV chargers in various building types, including multifamily residential and nonresidential land uses. They include requirements for both EV capable parking spaces and the installation of Level 2 EV supply equipment for multifamily residential and nonresidential buildings. The 2022 CALGreen standards include requirements for both EV readiness and the actual installation of EV chargers. The 2022 CALGreen standards include both mandatory requirements and more aggressive voluntary Tier 1 and Tier 2 provisions.

Advanced Clean Cars Program

CARB adopted the Advanced Clean Cars program in 2012 in coordination with the EPA and National Highway Traffic Safety Administration. The program combines the control of smog-causing pollutants and GHG emissions into a single coordinated set of requirements for vehicle model years 2015 through 2025. The program promotes development of environmentally superior passenger cars and other vehicles, as well as saving the consumer money through fuel savings.³⁹

Regional and Local

Peninsula Clean Energy 2018 Integrated Resource Plan

Peninsula Clean Energy adopted the 2018 Integrated Resource Plan on December 14, 2017 to provide guidance for serving the electricity needs of the residents and businesses in the County, all while fulfilling regulatory requirements over a 10-year period from 2018-2027. The plan contains the following strategic goals that are relevant to the Housing Element Update:

- Design a diverse power portfolio that is greenhouse gas free:
 - 100% GHG free by 2021;
 - 100% Renewable Portfolio Standard (RPS)-eligible renewable energy by 2025;
 - Minimum of 20 MWs of new local power by 2025.
- Stimulate development of new renewable energy projects and clean-tech innovation in San Mateo County and California through Peninsula Clean Energy's procurement activities
- Implement programs to further reduce greenhouse gas emissions by investing in programs such as local clean power production, electric vehicles, energy efficiency, and demand

³⁹ California Air Resources Board. "The Advanced Clean Cars Program." Accessed October 24, 2022. <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program>

response, and partnering effectively with local businesses, schools, and nonprofit organizations

Peninsula Clean Energy meets its renewable energy requirements with a combination of RPS-eligible energy products. According to the 2018 Integrated Resource Plan, Peninsula Clean Energy procured enough renewable energy to meet a 50 percent voluntary target as of 2017. The proportion of Peninsula Clean Energy’s resource mix that is sourced from bundled renewable energy products will significantly increase as Peninsula Clean Energy transitions toward 100 percent renewable energy content in 2025. Based on targeted renewable energy percentages, Peninsula Clean Energy intends to significantly outpace California’s annual RPS procurement mandates throughout the 2018-2027 planning period.

City of San Bruno General Plan

Various policies and actions of the City of San Bruno General Plan have been adopted for the purpose of avoiding or mitigating energy impacts resulting from planned development within the City, including the following:

Policies	Description
PFS-62	<p>Develop and implement a Green Building Design Ordinance and design guidelines for climate-oriented site planning, building design, and landscape design to promote energy efficiency. These standards may include, but are not limited to, the following:</p> <ul style="list-style-type: none"> • Require the use of Energy Star[®] appliances and equipment in new residential and commercial development, and new City facilities; • Require all new City facilities and new residential development to incorporate green building methods meeting the equivalent of LEED Certified “Silver” rating or better; and • Require all new residential development to be pre-wired for optional photovoltaic roof energy systems and/or solar water heating. <p>The Ordinance will allow variances to site or building requirements—building setbacks, lot coverage, and building height—that will enable use of alternative energy sources, such as passive heating and/or cooling.</p>
PFS-63	Require that all new development complies with California’s Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24, Part 6).
PFS-65	<p>Require new development to incorporate passive heating and natural lighting strategies if feasible and practical. These strategies should include, but are not limited to, the following:</p> <ul style="list-style-type: none"> • Using building orientation, mass and form, including façade, roof, and choice of building materials, color, type of glazing, and insulation to minimize heat loss during winter months and heat gain during the summer months; • Designing building openings to regulate internal climate and maximize natural lighting, while keeping glare to a minimum; and • Reducing heat-island effect of large concrete roofs and parking surfaces.
PFS-66	Enforce landscape requirements that facilitate efficient energy use or conservation, such as drought-resistant landscaping and/or deciduous trees along southern exposures.

Policies	Description
PFS-70	Facilitate environmentally sensitive construction practices by: <ul style="list-style-type: none"> • Restricting use of chlorofluorocarbons (CFCs), hydrochlorofluorocarbons (HCFCs) and halons in mechanical equipment; • Promoting use of products that are durable and allow efficient end-of-life disposal (e.g. reusable, recyclable, biodegradable); • Promoting the purchase of locally or regionally available materials; and • Promoting the use of cost-effective design and construction strategies that reduce resource and environmental impacts.
PFS-71	Convert street lights and traffic signals to LED and other more efficient technologies as they become available.

Transit Corridors Plan

As noted in Section 3.1.1.1, Housing Opportunity Sites 1, 2, 4, 5, 7, 9, 11, 12, 15, 17, 20, 21, 22, and 23 are located within the TCP area. The TCP includes development standards and design guidelines that govern future private development actions in the TCP area, including the following which pertain to energy.

Policies	Description
A10-11	Encourage the installation of solar panels on roof-decks of parking structures, both as shading devices for vehicles and as a sustainable energy source.
A10-12	Provide preferred parking for alternative energy vehicles and charging stations for electric powered vehicles. Provide dedicated parking for car-share vehicles.
A14-1	Orient courtyards, open spaces and façades to the south to maximize heat gain and natural sunlight
A14-2	Minimize building heights on the north side of developments to reduce shadows.
A14-8	Provide operable windows wherever possible to allow passive ventilation, heating and cooling.
A15-5	Encourage solar panels on building rooftops and/or façades to supplement the energy source.
A15-8	Encourage the use of “cool and/or green” roofs to reduce heat island effect and thereby reduce the heat transferred into the building below. Cool roofs consist of materials that effectively reflect the sun’s energy. Alternatively, green roofs achieve the same purpose and include vegetation to harvest rainwater for reuse and diminish runoff.

Bayhill Specific Plan

As noted in Section 3.1.1.1, Housing Opportunity Sites 3 and 13 are located within the Bayhill Specific Plan area. Chapter Six of the Bayhill Specific Plan includes mandatory “Environmental Quality” policies, including the following which pertain to energy.

Policy 3-25

Policy 3-25 requires projects to integrate solar panels, natural light and ventilation, cool/green roofs and walls, sustainable building materials, and building placement and orientation that allows for natural cooling and passive solar heating into building designs.

Policy 6-15

Policy 6-15 requires projects to meet LEED Silver Certification requirements or equivalent, employ electric space and water heating appliances, and cover 30 percent of their roofs with solar panels.

Policy 6-17

Policy 6-17 encourages projects to participate in local government- and utility-run programs to promote energy efficiency and reduce GHG emissions.

4.6.1.2 *Existing Conditions*

Total energy usage in California was approximately 6,957 trillion British thermal units (Btu) in the year 2020, the most recent year for which this data was available.⁴⁰ Out of the 50 states, California is ranked second in total energy consumption and 49th in energy consumption per capita. The breakdown by sector was approximately 21 percent (1,508 trillion Btu) for residential uses, 19.6 percent (1,358 trillion Btu) for commercial uses, 24.6 percent (1,701 trillion Btu) for industrial uses, and 34 percent (2,356 trillion Btu) for transportation.⁴¹ This energy is primarily supplied in the form of natural gas, petroleum, nuclear electric power, and hydroelectric power which originate from a diverse set of international, national, state and regional sources.

Electricity

Electricity in San Mateo County in 2020 was consumed primarily by the non-residential sector (60 percent), with the residential sector consuming 40 percent. In 2020, a total of approximately 4,166 gigawatt hours (GWh) of electricity was consumed in San Mateo County.⁴²

Peninsula Clean Energy is a public and locally controlled electricity provider for the County of San Mateo. Electricity provided by Peninsula Clean Energy is delivered through PG&E transmission lines. Commercial and residential customers in San Mateo County are included in the Peninsula Clean Energy service area and can choose to have 50 to 100 percent of their electricity supplied from carbon-free and renewable sources. Customers are automatically enrolled in the ECOplus plan, which generates its electricity from 100 percent carbon-free sources, with at least 50 percent from renewable sources. Customers have the option to enroll in the ECO100 plan, which generates its electricity from 100 percent carbon-free, renewable sources.⁴³

⁴⁰ United States Energy Information Administration. “California Energy Consumption by End-Use-Sector, 2020.” Accessed October 24, 2022. <https://www.eia.gov/state/?sid=CA#tabs-2>.

⁴¹ Ibid.

⁴² California Energy Commission. Energy Consumption Data Management System. “Electricity Consumption by County.” Accessed October 24, 2022. <http://ecdms.energy.ca.gov/elecbycounty.aspx>.

⁴³ Peninsula Clean Energy. “Frequently Asked Questions.” Accessed October 24, 2022. <https://www.peninsulacleanenergy.com/faq/>.

Natural Gas

PG&E provides natural gas services within San Mateo. In 2020, approximately two percent of California's natural gas supply came from in-state production, while the remaining supply was imported from other western states and Canada.⁴⁴ In 2020 California used 2,144 trillion Btu of natural gas.⁴⁵ In 2020, San Mateo County used less than one percent of the state's total consumption of natural gas (total of 200 million therms of natural gas).⁴⁶

Fuel for Motor Vehicles

In 2019, 15.4 billion gallons of gasoline were sold in California.⁴⁷ The average fuel economy for light-duty vehicles (autos, pickups, vans, and sport utility vehicles) in the United States has steadily increased from about 13.1 miles per gallon (mpg) in the mid-1970s to 25.4 mpg in 2020.⁴⁸ Federal fuel economy standards have changed substantially since the Energy Independence and Security Act was passed in 2007. That standard, which originally mandated a national fuel economy standard of 35 miles per gallon by the year 2020, was updated in April 2022 to require all cars and light duty trucks achieve an overall industry average fuel economy of 49 mpg by model year 2026.^{49,50}

4.6.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
1) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

⁴⁴ California Gas and Electric Utilities. 2020 *California Gas Report*. Accessed July 20, 2022.

https://www.socalgas.com/sites/default/files/2020-10/2020_California_Gas_Report_Joint_Utility_Biennial_Comprehensive_Filing.pdf.

⁴⁵ United States Energy Information Administration. "California Energy Consumption Estimate, 2020." Accessed July 20, 2022. <https://www.eia.gov/state/?sid=CA#tabs-2>.

⁴⁶ California Energy Commission. "Natural Gas Consumption by County." Accessed July 20, 2022. <http://ecdms.energy.ca.gov/gasbycounty.aspx>.

⁴⁷ California Department of Tax and Fee Administration. "Net Taxable Gasoline Gallons." Accessed July 20, 2022. <https://www.cdtfa.ca.gov/dataportal/dataset.htm?url=VehicleTaxableFuelDist>.

⁴⁸ United States Environmental Protection Agency. *The 2021 EPA Automotive Trends Report: Greenhouse Gas Emissions, Fuel Economy, and Technology since 1975*. November 2021.

⁴⁹ United States Environmental Protection Agency. "Summary of the Energy Independence and Security Act." Accessed July 20, 2022. <https://www.epa.gov/laws-regulations/summary-energy-independence-and-security-act>.

⁵⁰ United States Department of Transportation. "USDOT Announces New Vehicle Fuel Economy Standards for Model Year 2024-2026." Accessed July 20, 2022. <https://www.nhtsa.gov/press-releases/usdot-announces-new-vehicle-fuel-economy-standards-model-year-2024-2026>

Impact EN-1: The project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. **(Less than Significant Impact)**

Construction-Related Energy Consumption

Construction associated with future development under the Housing Element Update would result in the temporary usage and consumption of electricity to power electric construction equipment, mobile offices, or water delivered to construction sites; gasoline and diesel fuel used for transportation of workers and haul trucks to and from construction sites; and fuel used for operation of off-road equipment. Construction-related energy usage and consumption would be dispersed over the course of the 2023-2031 buildout period, and would vary based on the level of activity, length of construction period, specific construction operations, types of equipment, and number of personnel. Since the timing and intensity of the construction activity required for future development projects under the Housing Element Update is not yet known, energy consumption by future development cannot be quantified.

The overall construction schedule and process is designed to be efficient in order to avoid excess monetary costs. That is, equipment and fuel would not be used wastefully on the project site because of the added expense associated with renting the equipment, maintaining it, and fueling it. Further, the Housing Opportunity Sites are located in urbanized areas in proximity to roadways, construction supplies, and workers, making it more efficient than construction occurring in outlying, undeveloped areas. Therefore, energy consumption by construction of future development would not be wasteful, inefficient, or unnecessary.

In addition to the above, policies and measures have been identified throughout this Initial Study that would ensure that energy consumption during construction is not wasteful, inefficient, or unnecessary. General Plan Policy ERC-26 and MM AIR-3.1 would require equipment to be shut off when not in use or reduce idle times to five minutes at maximum. The Bayhill Specific Plan includes Mitigation Measure AQ-3, which requires 50-hp plus construction equipment with a projected operation time of 20 hours or more to use renewable diesel; and Mitigation Measure GHG-1, which requires 15 percent of the construction fleet to be alternatively fueled; Mitigation Measure NOI-1, which prohibits idling of construction equipment at night. For these reasons, construction of future development under the Housing Element Update would not be wasteful, inefficient, or unnecessary. **(Less than Significant Impact)**

Operation-Related Energy Consumption

For purposes of this analysis, buildout of the Housing Opportunity Sites at the densities assumed by the Housing Element Update is anticipated to result in the construction of six single-family residences, 967 low-rise apartment units, and 1,735 mid-rise apartment units.⁵¹ Once constructed,

⁵¹ At the time of analysis, the technical studies prepared for the Housing Element Update assumed buildout would result in six single-family residences, 967 low-rise apartment units, and 1,735 mid-rise apartment units. The City now anticipates that buildout of the Housing Element Update would result in 138 single-family detached, 836 low-rise apartment, and 1,735 mid-rise apartment units, which corresponds with an additional 363 daily vehicle trips. This represents an increase of approximately two percent, which the Air Quality, Greenhouse Gas Emissions, Noise,

gasoline would be consumed during vehicle trips by future residents, which is anticipated to be primarily light-duty vehicles. Electricity would be consumed by future development in order to power buildings. Consistent with MM GHG-1.2 (refer to Impact GHG-1 in Section 4.8.1.2 Greenhouse Gas Emissions), natural gas infrastructure and appliances would be prohibited in future residential development at the Housing Opportunity Sites, and therefore the natural gas consumption assumed by CalEEMod was converted to electricity.

Without factoring in gasoline and electricity consumed by existing uses, buildout of the Housing Opportunity Sites is conservatively anticipated to result in the annual consumption of 1,198,896 gallons of gasoline and 10,690,376 kWh (equivalent to 10.7 GWh) of electricity.⁵² In comparison with gasoline consumption statewide (the cumulative area of effect), the project's gasoline consumption would be less than 1/10000th of a percent.⁵³ Traffic generated by the proposed residential uses would be primarily light-duty vehicles, which are the most efficient from a fuel economy perspective, and an increasingly substantial portion of project-generated traffic would be electric vehicles. In comparison with electricity consumption countywide (the cumulative area of effect), the project's energy consumption would be less than 1/100th of a percent. Additionally, future development would be constructed in accordance with Part 6 and Part 11 of Title 24, which would reduce the demand for energy resources by incorporating sustainability features that would promote energy efficiency and increase reliance on renewable energy sources. Adherence with policies provided in the General Plan, TCP, and Bayhill Specific Plan and mitigation measures provided in their respective EIRs and this Initial Study to avoid or reduce air pollutant and GHG emissions and reduce consumption of energy resources would further ensure that consumption of electricity would not be wasteful, inefficient, or unnecessary. For these reasons, buildout of the Housing Element Update would not result in the wasteful, inefficient, or unnecessary consumption of energy resources. **(Less than Significant Impact)**

Impact EN-2: The project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. **(Less than Significant Impact)**

State and local renewable energy and energy efficiency plans that are applicable to the Housing Element Update are discussed in Section 4.6.1.1. Future development under the Housing Element Update would be subject to current energy efficiency standards set forth in Title 24. In addition, all residents in San Bruno are automatically enrolled in the Peninsula Clean Energy ECOplus plan, which provides customers with electricity that is generated from 50 percent renewable sources and 100 percent carbon-free sources. Additionally, future residential development at the Housing Opportunity Sites would be required to be fully electric (i.e., no consumption of natural gas) by MM GHG-1.2, which would ensure future development is able to take full advantage of the 100 percent renewable or GHG-free electricity generated by Peninsula Clean Energy through implementation of

Vibration, and Transportation consultants have confirmed would not change the conclusions presented in this Initial Study and Appendices A, B, and C. Appendix D and the associated water supply analysis is unaffected by this change.

⁵² Electricity based on projected natural gas and electricity consumption outputs provided in Appendix A. September 14, 2022. Gasoline estimation based conservatively on 2020 average fuel economy (25.4 mpg) and 30,451,950 annual VMT.

⁵³ Gasoline consumption does not factor in the 240 ADUs, since their future location is not reasonably foreseeable, and therefore VMT cannot be estimated.

its 2018 Integrated Resource Plan. For these reasons, implementation of the Housing Element Update would not conflict with a state or local plan for renewable energy or energy efficiency.

4.7 GEOLOGY AND SOILS

4.7.1 Environmental Setting

4.7.1.1 *Regulatory Framework*

State

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act was passed following the 1971 San Fernando earthquake. The act regulates development in California near known active faults due to hazards associated with surface fault ruptures. Alquist-Priolo maps are distributed to affected cities, counties, and state agencies for their use in planning and controlling new construction. Areas within an Alquist-Priolo Earthquake Fault Zone require special studies to evaluate the potential for surface rupture to ensure that no structures intended for human occupancy are constructed across an active fault.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act (SHMA) was passed in 1990 following the 1989 Loma Prieta earthquake. The SHMA directs the California Geological Survey (CGS) to identify and map areas prone to liquefaction, earthquake-induced landslides, and amplified ground shaking. CGS has completed seismic hazard mapping for the portions of California most susceptible to liquefaction, landslides, and ground shaking, including the central San Francisco Bay Area. The SHMA requires that agencies only approve projects in seismic hazard zones following site-specific geotechnical investigations to determine if the seismic hazard is present and identify measures to reduce earthquake-related hazards.

California Building Standards Code

The California Building Standards Code (CBC) prescribes standards for constructing safe buildings. The CBC contains provisions for earthquake safety based on factors including occupancy type, soil and rock profile, ground strength, and distance to seismic sources. The CBC requires that a site-specific geotechnical investigation report be prepared for most development projects to evaluate seismic and geologic conditions such as surface fault ruptures, ground shaking, liquefaction, differential settlement, lateral spreading, expansive soils, and slope stability. The CBC is updated every three years.

California Division of Occupational Safety and Health Regulations

Excavation, shoring, and trenching activities during construction are subject to occupational safety standards for stabilization by the California Department of Industrial Relations, Division of Occupational Safety and Health (Cal/OSHA) under Title 8 of the California Code of Regulations and Excavation Rules. These regulations minimize the potential for instability and collapse that could injure construction workers on the site.

Public Resources Code Section 5097.5

Paleontological resources are the fossilized remains of organisms from prehistoric environments found in geologic strata. They range from mammoth and dinosaur bones to impressions of ancient animals and plants, trace remains, and microfossils. These materials are valued for the information they yield about the history of the earth and its past ecological settings. California Public Resources Code Section 5097.5 specifies that unauthorized removal of a paleontological resource is a misdemeanor. Under the CEQA Guidelines, a project would have a significant impact on paleontological resources if it would disturb or destroy a unique paleontological resource or site or unique geologic feature.

Local

City of San Bruno General Plan

Various policies and actions of the City of San Bruno General Plan have been adopted for the purpose of avoiding or mitigating geology and soils impacts resulting from planned development within the City, including the following:

Policies	Description
ERC-44	If, prior to grading or construction activity, an area is determined to be sensitive for paleontological resources, retain a qualified paleontologist to recommend appropriate actions. Appropriate action may include avoidance, preservation in place, excavation, documentation, and/or data recovery, and shall always include preparation of a written report documenting the find and describing steps taken to evaluate and protect significant resources.
HS-B	Reduce the potential for damage from geologic hazards through appropriate site design and erosion control.
HS-C	Reduce the potential for damage from seismic hazards through geotechnical analysis, hazard abatement, emergency preparedness, and recovery planning.
HS-1	Regulate development, including remodeling or structural rehabilitation, to assure adequate mitigation of safety hazards on sites having a history or threat of slope instability, erosion, subsidence, seismic dangers (including those resulting from liquefactions, ground failure, ground rupture), flooding, and/or fire hazards.
HS-2	Review and revise the City’s Building Code, Zoning Ordinance, and Subdivision requirements to safeguard against seismic, geologic, and safety hazards. Mitigation should include: <ul style="list-style-type: none">• Minimal grading and removal of natural vegetation to prevent erosion and slope instability. Cleared slopes should be replanted with vegetation.• Proper drainage control to prevent erosion of the site and affected properties.• Careful siting and structural engineering in unstable areas.• Consideration of flooding and fire hazards in siting and designing new development.
HS-3	Require geotechnical investigation of all sites, except single-family dwellings, proposed for development in areas where geologic conditions or soil types are subject to landslide risk, slippage, erosion, liquefaction, or expansive soils. (Require submission of

Policies	Description
	geotechnical investigation and demonstration that the project conforms to all recommended mitigation measures prior to City approval.
HS-4	Prevent soil erosion by retaining and replanting vegetation, and by siting development to minimize grading and land form alteration.
HS-5	Require preparation of a drainage and erosion control plan for land alteration and vegetation removal on sites greater than 10,000 sq. ft. in size.
HS-7	Development in areas subject to seismic hazards, including ground shaking, liquefaction, and seismically-induced landslides (Figure 7-2) will comply with guidelines set forth in the most recent version of the California Division of Mines and Geology Special Publication 117.
HS-9	In accordance with the Alquist-Priolo Special Studies Zones Act, do not permit structures across an active fault (Figure 7-2) or within 50 feet of an active fault, except single-family wood frame dwellings where no other location on a lot is feasible. Require any new development to contract with geotechnical engineers to reduce potential damage from seismic activity.
HS-10	Recommend a geologic report by a qualified geologist for construction or remodeling of all structures, including single-family dwellings, proposed within 100 feet of a historically active or known active fault (Figure 7-2). Geologic reports should recommend minimum setbacks, siting and structural safety standards, to reduce potential seismic hazards. Geologic reports must be filed with the State Geologist by the City within 30 days of receipt.
HS-22	Require that construction-related grading and other activities comply with the Association of Bay Area Governments' (ABAG) Manual of Standards for Erosion and Sediment Control Measures and with the California Stormwater Quality Association (CASQA), Stormwater Best Management Practice Handbook for Construction.

City of San Bruno Municipal Code

Title 12, Land Use, Article I, Excavation and Grading, of the San Bruno Municipal Code sets forth general provisions, permitting requirements, grading regulations, and specific elements required in requested soil and engineering reports, including:

- An adequate description of the geology of the site;
- Conclusions and recommendations regarding the effect of geologic conditions on the proposed development;
- Opinions and recommendations covering the adequacy of sites to be developed by the proposed grading;
- Data regarding the nature, distribution, strength, and in place relative compaction of existing soils;
- Conclusions and recommendations for grading procedures and design criteria for corrective measures when necessary;
- Ground water conditions;
- Data on erodibility of the soil;

- Draft specifications for erosion control measures. For purposes of such draft specifications, reference is made to Association of Bay Area Governments Manual for Surface Runoff Control Measures, pages 1-45, through 1-151, inclusive. (Ord. 1369 § 1, 1981; prior code § 9-1.7(a))

Bayhill Specific Plan

Various policies in the Bayhill Specific Plan have been adopted for the purpose of avoiding or mitigating geology and soils impacts resulting from planned development within the Bayhill Specific Plan area, including the following:

Policies	Description
3-3	Require Naturalistic Site Grading and Earthwork. Site grading shall create a naturalistic appearance, without dramatic terracing, berming, and other obvious earthwork approaches. Mounding earth shall be used only to accommodate differentials between first floor building elevations and adjacent sidewalk grades, and to accommodate trees and other planting above underground parking garages.
6-31	Require that all applicants proposing development projects involving the development of new foundations for buildings within the Plan Area prepare a site-specific geotechnical exploration as part of the design process for the building. The exploration shall include borings and laboratory soil testing to provide data for preparation of specific recommendations regarding grading, foundation design, and drainage for the proposed development. The geotechnical explorations shall be subject to review and approval by the San Bruno Public Works Department.
6-32	Require that all applicants proposing to undertake excavation, drilling, or pile-driving activities for new buildings within the Plan Area retain a qualified paleontologist prior to the start of any ground-disturbing activities. The paleontologist should be qualified as defined by the Society for Vertebrate Paleontology and experienced in teaching non-specialists. The qualified paleontologist shall train all construction personnel who are involved with earthmoving activities, including the site superintendent, regarding the possibility of encountering fossils, the appearance and types of fossils that are likely to be seen during construction, and proper notification procedures should fossils be encountered. Procedures to be conveyed to workers include halting construction within 50 feet of any potential fossil find and notifying a qualified paleontologist, who shall evaluate the significance. The qualified paleontologist shall also make periodic visits during earthmoving in high sensitivity sites to verify that workers are following the established procedures
6-33	Require that all applicants undertaking earth moving projects within the Plan Area adequately respond to the discovery of paleontological resources.

4.7.1.2 Existing Conditions

Geology

San Bruno is located within the Coast Ranges geomorphic province formed by the Franciscan, Merced, and Colma assemblages, which are principally composed of marine sedimentary and

volcanic rocks, as well as deposits of sandstone, claystone, siltstone, gravel, sand, silt, and clay. The eastern portion of the City is former marginal tideland filled in with artificial fill material.

Seismicity

San Bruno is located within the seismically active San Francisco Bay Area region. The faults in this region are capable of generating earthquakes of magnitude 7.0 or higher. Major active faults in the region include the San Andreas (adjacent), the San Gregorio-Hosgri (eight miles southwest), the Hayward (18 miles east) the Calaveras (25 miles east), Concord-Green Valley (30 miles northeast), and Healdsburg-Rodgers Creek (36 miles north).

Soils

According to the General Plan EIR, San Bruno is characterized by three major soil associations: the Sunnyvale-Castro, Elkhorn-Colma, and Sweeney-Mindego. The Sunnyvale-Castro association underlies the eastern side of San Bruno, west of the San Francisco International Airport. These soils occur on nearly level, low portions of the valley and originally developed from fine-textured alluvium. They drain slowly due to clay content and have developed under surface water runoff and high groundwater levels. In general, these soils have dark clay surface layers with calcareous or lime-cemented subsoils. The Elkhorn-Colma association underlies San Bruno between El Camino Real and I-280. These soils occur on five to 15 percent slopes in areas of San Mateo County. These soils drain well due to sand clay mixtures, and erosion can be a problem on steeper slopes. Soils of the Sweeney-Mindego association occur on slopes ranging from 30 to 70 percent and underlie the upland areas on the western side of San Bruno. These soils developed from igneous rock and can be well drained due to silt-sand-clay mixtures.⁵⁴

On-Site Geologic Conditions

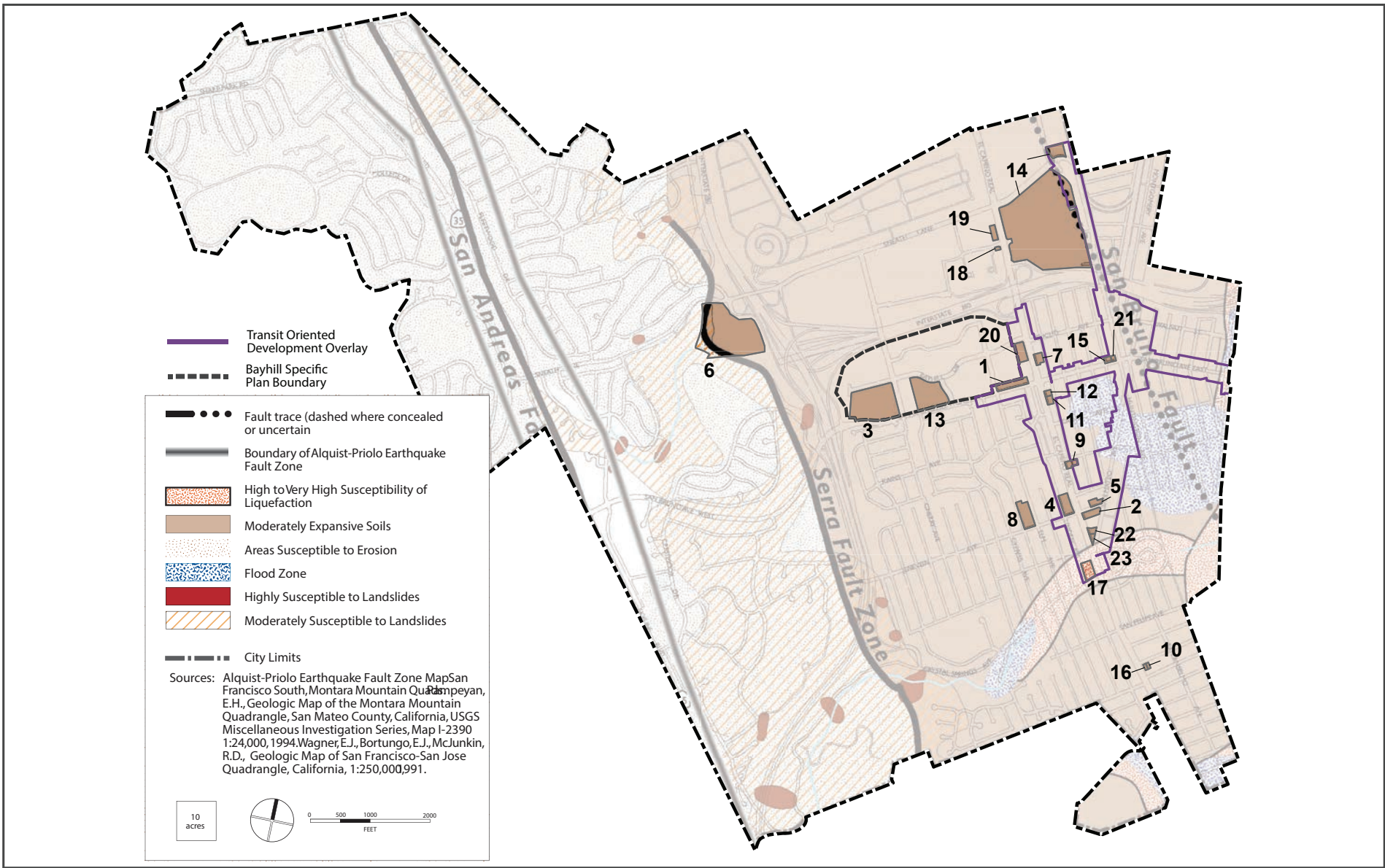
General Plan and Municipal Code Conformant Sites

Housing Opportunity Site 6

Housing Opportunity Site 6 generally slopes from the south to the north with steeper slopes along the eastern and western boundaries. According to maps prepared by the CGS, the site is not within an Alquist-Priolo Earthquake Fault Zone. The project site is mapped by the CGS within a Liquefaction Landslide Overlay Zone.⁵⁵ According to maps prepared for the General Plan, the site has moderately expansive soils (refer to Figure 4.7-1).

⁵⁴ City of San Bruno. *San Bruno 2025: General Plan Draft Environmental Impact Report*. Page 3-158. December 2008.

⁵⁵ California Geological Survey. California Earthquake Hazards Zone Application (EQ ZAPP). Accessed August 12, 2022. <https://maps.conservation.ca.gov/cgs/EQZApp/app/>



GEOLOGIC AND SEISMIC HAZARDS

FIGURE 4.7-1

Housing Opportunity Site 8

Housing Opportunity Site 8 and the surrounding area is generally flat. According to maps prepared by the CGS, the site is not within an Alquist-Priolo Earthquake Fault Zone or Landslide Hazard Zone.⁵⁶ The project site is mapped by the CGS within a Liquefaction Zone.⁵⁷ According to maps prepared for the General Plan, the site has moderately expansive soils (refer to Figure 4.7-1).

Housing Opportunity Sites 10 and 16

Housing Opportunity Sites 10 and 16 and the surrounding area is generally flat. According to maps prepared by the CGS, the sites are not within an Alquist-Priolo Earthquake Fault Zone, Landslide Hazard Zone, or Liquefaction Zone.⁵⁸ According to maps prepared for the General Plan, the site has moderately expansive soils (refer to Figure 4.7-1).

Housing Opportunity Site 18

Housing Opportunity Site 18 and the surrounding area is generally flat. According to maps prepared by the CGS, the site is not within an Alquist-Priolo Earthquake Fault Zone or Landslide Hazard Zone.⁵⁹ The project site is mapped by the CGS within a Liquefaction Zone.⁶⁰ According to maps prepared for the General Plan, the site has moderately expansive soils (refer to Figure 4.7-1).

Housing Opportunity Site 19

Housing Opportunity Site 19 and the surrounding area is generally flat. According to maps prepared by the CGS, the site is not within an Alquist-Priolo Earthquake Fault Zone or Landslide Hazard Zone.⁶¹ The project site is mapped by the CGS within a Liquefaction Zone.⁶² According to maps prepared for the General Plan, the site has moderately expansive soils (refer to Figure 4.7-1).

Transit Corridors Plan Area Sites

As noted in Section 3.1.1.1, Housing Opportunity Sites 1, 2, 4, 5, 7, 9, 11, 12, 15, 17, 20, 21, 22, and 23 are located within the TCP area. The TCP area is flat and is not subject to landslides. None of the TCP area sites are within an Alquist-Priolo Earthquake Fault Zone.⁶³ The potential San Bruno Fault traverses the center of the Transit Corridors Area in a north-south alignment. There is evidence to suggest that the San Bruno fault may not exist, or at least that it is not as significant as initially proposed.⁶⁴ Housing Opportunity Sites 1, 4, 7, 9, 11, 12, 15, 17, 20, 21, 22, and 23 are mapped by the

⁵⁶ California Geological Survey. California Earthquake Hazards Zone Application (EQ ZAPP). Accessed August 12, 2022. <https://maps.conservation.ca.gov/cgs/EQZApp/app/>

⁵⁷ Ibid.

⁵⁸ California Geological Survey. California Earthquake Hazards Zone Application (EQ ZAPP). Accessed August 12, 2022. <https://maps.conservation.ca.gov/cgs/EQZApp/app/>

⁵⁹ California Geological Survey. California Earthquake Hazards Zone Application (EQ ZAPP). Accessed August 12, 2022. <https://maps.conservation.ca.gov/cgs/EQZApp/app/>

⁶⁰ Ibid.

⁶¹ California Geological Survey. California Earthquake Hazards Zone Application (EQ ZAPP). Accessed August 12, 2022. <https://maps.conservation.ca.gov/cgs/EQZApp/app/>

⁶² Ibid.

⁶³ City of San Bruno. San Bruno Transit Corridors Plan Environmental Impact Report. June 2012.

⁶⁴ Ibid.

CGS within a Liquefaction Zone.⁶⁵ Expansive soils are likely to be encountered within the Transit Corridors Area given the underlying Colma Formation and the Sunnyvale-Castro soils association.

Bayhill Specific Plan Area Sites

As noted in Section 3.1.1.1, Housing Opportunity Sites 3 and 13 are located within the Bayhill Specific Plan area. None of the Bayhill Specific Plan sites are within an Alquist-Priolo Earthquake Fault Zone.⁶⁶ According to maps prepared by CGS, Housing Opportunity Site 3 is located within an Earthquake Fault Zone and Landslide Zone.⁶⁷ Housing Opportunity Site 13 is located within a Liquefaction Zone.⁶⁸ According to maps prepared for the General Plan, the sites have moderately expansive soils (refer to Figure 4.7-1).

Historic groundwater elevation within the Bayhill Specific Plan range from approximately 10 to more than 50 feet below ground surface (bgs), varying likely with seasonality, weather conditions, and irrigation.⁶⁹

Housing Opportunity Site 14

Housing Opportunity Site 14 and the surrounding area is generally flat. According to maps prepared by the CGS, the site is not within an Alquist-Priolo Earthquake Fault Zone or Landslide Hazard Zone.⁷⁰ The project site is mapped by the CGS within a Liquefaction Zone.⁷¹ According to maps prepared for the General Plan, the site has moderately expansive soils (refer to Figure 4.7-1).

Paleontological Resources

As discussed above, the City is divided into three distinct geological areas. The area east of I-280 is underlain by deposits of the Colma Formation, which is Quaternary-aged (about 1 million years old), the area west of I-280 but east of Skyline Boulevard is underlain by deposits of the Merced Formation, which is Pliocene-aged (3 to 11 million years old), and finally, the area west of Skyline Boulevard is underlain by deposits of sheared Franciscan Assemblage sandstone, which are Cretaceous-aged (65 to 136 million years old). All of the Housing Opportunity Sites (with the exception of Site 6) are located on the Colma Formation; Site 6 is located on the Merced Formation. There are no recorded fossil recovery sites in the City of San Bruno.⁷²

⁶⁵ Ibid.

⁶⁶ City of San Bruno. Bayhill Specific Plan including Phase I Development. Final EIR. October 2021.

⁶⁷ California Geological Survey. California Earthquake Hazards Zone Application (EQ ZAPP). Accessed August 12, 2022. <https://maps.conservation.ca.gov/cgs/EQZApp/app/>

⁶⁸ Ibid.

⁶⁹ City of San Bruno. Bayhill Specific Plan including Phase I Development. Final EIR. October 2021.

⁷⁰ California Geological Survey. California Earthquake Hazards Zone Application (EQ ZAPP). Accessed August 12, 2022. <https://maps.conservation.ca.gov/cgs/EQZApp/app/>

⁷¹ Ibid.

⁷² Macrostrat. "Geologic Map". Accessed October 22, 2022. <https://macrostrat.org/map/layers#x=-122.4&y=37.608&z=11.72&show=fossils>

4.7.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
1) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
– Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault (refer to Division of Mines and Geology Special Publication 42)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
– Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
– Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
– Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4) Be located on expansive soil, as defined in the current California Building Code, creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Impact GEO-1: The project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault; strong seismic ground shaking; seismic-related ground failure, including liquefaction; or landslides. **(Less than Significant Impact)**

Fault Rupture

As discussed in Section 4.7.1.2, none of the Housing Opportunity Sites are within an Alquist-Priolo Earthquake Fault Zone. While existing faults are located in the region, Housing Opportunity Sites are outside of the fault zone for any regional fault systems, and loss, injury, or death from fault ruptures would not occur on the sites. Per General Plan policy HS-3, residential development on the Housing Opportunity Sites would be supported by geotechnical investigations of all sites, except single-family dwellings, proposed for development in areas where geologic conditions or soil types are subject to landslide risk, slippage, erosion, liquefaction, or expansive soils. Residential developments would be required to submit a geotechnical investigation and demonstrate that the project conforms to all recommended mitigation measures prior to City approval. **(Less than Significant Impact)**

Ground Shaking

All of the Housing Opportunity Sites are located within the seismically active San Francisco Bay region. The faults in this region can generate earthquakes of magnitude 7.0 or higher. During an earthquake, very strong ground shaking could occur. In accordance with the CBC, City's General Plan, and Municipal Code, future redevelopment of the Housing Opportunity Sites would be built using standard engineering and seismic safety design techniques, in accordance with the CBC, as well as applicable Building and Fire Codes adopted by the City of San Bruno to avoid or minimize potential damage from seismic shaking. Conformity with the aforementioned regulations would ensure less than significant impacts from seismically-induced ground shaking. **(Less than Significant Impact)**

Ground Failure

Soil liquefaction can be defined as ground failure or loss of strength that causes otherwise solid soil to take on the characteristics of a liquid. This phenomenon is triggered by earthquake or ground shaking that causes saturated or partially saturated soils to lose strength, potentially resulting in the soil's inability to support structures. Soils most susceptible to liquefaction are loose, non-cohesive soils that are saturated and are bedded with poor drainage, such as sand and silt layers bedded with a cohesive cap. Lateral spreading typically occurs as a form of horizontal displacement of relatively flat-lying soil toward an open or "free" face such as an open body of water, channel, or excavation. This movement is often associated with liquefaction and commonly occurs on gentle slopes in seismically active regions. Lateral spread presents a significant hazard to the integrity of buildings and other structures.

Housing Opportunity Sites 1, 4, 6, 7, 8, 9, 11, 12, 13, 14, 15, 17, 18, 19, 20, 21, 22, and 23 are mapped by the CGS within Liquefaction and/or Landslide Hazard Zones. Conformance with the

CBC, the City's General Plan policies and Municipal Code requirements, and the recommendations of a site-specific geotechnical report (of which preparation and compliance with is required by the CBC and the General Plan Policy HS-3) would reduce the risk of seismically-induced liquefaction, lateral spreading, and landsliding at the Housing Opportunity Sites to a less than significant level. **(Less than Significant Impact)**

Impact GEO-2: The project would not result in substantial soil erosion or the loss of topsoil. **(Less than Significant Impact)**

Ground disturbance during buildout of the Housing Opportunity Sites is expected to occur during demolition, grading, site preparation, and construction activities. These activities could increase the exposure of on-site soils to wind and water erosion. The San Francisco Bay Region Municipal Regional Stormwater National Pollutant Discharge Elimination System (NPDES) Permit (MRP), urban runoff policies, and the Municipal Code are the primary means of enforcing erosion control measures through the grading and building permit process. In accordance with the CBC and City's General Plan and Municipal Code (refer to Section 4.7.1.1), future development under the Housing Element Update would be required to submit a site-specific geotechnical report, which would include erosion control measures.

In addition, future development under the Housing Element Update would prepare a Storm Water Pollution Prevention Plan (SWPPP) which would formally document sediment and erosion control measures to be implemented during construction in compliance with the NPDES General Permit for Construction Activities. Future development would reduce post-construction soil erosion by managing stormwater runoff in compliance with the MRP. With adherence to the policies and regulations outlined in Section 4.10, Hydrology and Water Quality, the Housing Element Update would not substantially increase soil erosion on-site or contribute to the loss of topsoil.

Impact GEO-3: The project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. **(Less than Significant Impact)**

As discussed under Impact GEO-1, multiple Housing Opportunity Sites are located within a Liquefaction and/or Landslide Hazard Zone; expansive soils may also be present at the Housing Opportunity Sites. By conforming with the applicable regulations and the recommendations of the site-specific geotechnical report (refer to Impact GEO-1), future development under the Housing Element Update would not result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.

Impact GEO-4: The project would not be located on expansive soil, as defined in the current California Building Code, creating substantial direct or indirect risks to life or property. **(Less than Significant Impact)**

Expansive soils possess a “shrink-swell” characteristic. Shrink-swell is the cyclic change in volume (expansion and contraction) that occurs in fine-grained clay sediments from the process of wetting and drying. Structural damage may result over a long period of time, usually the result of inadequate soil and foundation engineering or the placement of structures directly on expansive soils. Although expansive soils can be a hazard, it is generally mitigated through adherence with the standard engineering and building practices and techniques specified in the CBC as well as the applicable elements of City building and fire codes. The City of San Bruno’s Municipal Code, Chapter 12.12 Soils and Engineering Geology Report, requires that a geotechnical investigation complete with design and construction recommendations be approved prior to City approval of the project. Conformance with the City’s Municipal Code would ensure that impacts resulting from expansive soils present at the Housing Opportunity Sites are reduced to a less than significant level.

Impact GEO-5: The project would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. **(No Impact)**

All of the Housing Opportunity Sites are located in developed areas of San Bruno where sewers are available to dispose of wastewater. Future development under the Housing Element Update would not need to support septic tanks or alternative wastewater disposal systems.

Impact GEO-6: The project would not directly or indirectly destroy a unique paleontological resource or site or unique geological feature. **(Less than Significant Impact)**

Grading and excavation during construction of future development under the Housing Element Update could however result in significant impacts, if any unknown unique paleontological resources were discovered. As discussed above, preparation of a site-specific geotechnical investigation is required by the CBC and the City’s General Plan and Municipal Code (refer to Section 4.7.1.1) prior to issuance of any permits allowing ground-disturbing activities that could encounter paleontological resources. Sites determined to be paleontologically sensitive would be required by General Plan Policy ERC-44, to retain a qualified paleontologist to recommend appropriate actions. Appropriate action may include avoidance, preservation in place, excavation, documentation, and/or data recovery, and shall include preparation of a written report documenting the find and describing steps taken to evaluate and protect significant resources. With adherence to state and local regulations, future development under the Housing Element Update would identify and preserve any undiscovered paleontological resources encountered during construction, and ensure that impacts to paleontological resources would be less than significant.

4.8 GREENHOUSE GAS EMISSIONS

The following discussion is based, in part, on an Air Quality and Greenhouse Gas Assessment prepared for the Housing Element Update by Illingworth & Rodkin, Inc. A copy of this report, dated September 2022, is attached to this Initial Study as Appendix A.

4.8.1 Environmental Setting

4.8.1.1 *Background Information*

Gases that trap heat in the atmosphere, GHGs, regulate the earth's temperature. This phenomenon, known as the greenhouse effect, is responsible for maintaining a habitable climate. In GHG emission inventories, the weight of each gas is multiplied by its global warming potential (GWP) and is measured in units of CO₂ equivalents (CO₂e). The most common GHGs are carbon dioxide (CO₂) and water vapor but there are also several others, most importantly methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). These are released into the earth's atmosphere through a variety of natural processes and human activities. Sources of GHGs are generally as follows:

- CO₂ and N₂O are byproducts of fossil fuel combustion.
- N₂O is associated with agricultural operations such as fertilization of crops.
- CH₄ is commonly created by off-gassing from agricultural practices (e.g., keeping livestock) and landfill operations.
- Chlorofluorocarbons (CFCs) were widely used as refrigerants, propellants, and cleaning solvents, but their production has been stopped by international treaty.
- HFCs are now used as a substitute for CFCs in refrigeration and cooling.
- PFCs and SF₆ emissions are commonly created by industries such as aluminum production and semiconductor manufacturing.

An expanding body of scientific research supports the theory that global climate change is currently causing changes in weather patterns, average sea level, ocean acidification, chemical reaction rates, and precipitation rates, and that it will increasingly do so in the future. The climate and several naturally occurring resources within California are adversely affected by the global warming trend. Increased precipitation and sea level rise will increase coastal flooding, saltwater intrusion, and degradation of wetlands. Mass migration and/or loss of plant and animal species could also occur. Potential effects of global climate change that could adversely affect human health include more extreme heat waves and heat-related stress; an increase in climate-sensitive diseases; more frequent and intense natural disasters such as flooding, hurricanes and drought; and increased levels of air pollution.

4.8.1.2 *Regulatory Framework*

State

Assembly Bill 32/Senate Bill 32

Under the California Global Warming Solutions Act, also known as AB 32, CARB established a statewide GHG emissions cap for 2020, adopted mandatory reporting rules for significant sources of GHGs, and adopted a comprehensive plan, known as the Climate Change Scoping Plan, identifying how emission reductions would be achieved from significant GHG sources.

In 2016, SB 32 was signed into law, amending the California Global Warming Solution Act. SB 32, and accompanying Executive Order B-30-15, require CARB to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. CARB updated its Climate Change Scoping Plan in December of 2017 to express the 2030 statewide target in terms of million metric tons of CO₂e (MMTCO₂e). Based on the emissions reductions directed by SB 32, the annual 2030 statewide target emissions level for California is 260 MMTCO₂e.

CARB is now in the process of updating the Scoping Plan to assess the state's progress toward the statutory 2030 target, while laying out a path to achieving carbon neutrality no later than 2045. The Proposed 2022 Scoping Plan Update focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet the State's long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities. A draft of this scoping plan was released on May 10, 2022.

Executive Order B-55-18

In 2018, a new statewide goal was established to achieve carbon neutrality as soon as possible, but no later than 2045, and to maintain net negative emissions thereafter. CARB and other relevant state agencies are tasked with establishing sequestration targets and create policies/programs that would meet this goal. The Draft 2022 Scoping Plan Update addresses Executive Order (EO) B-55-18 and would cost-effectively achieve carbon-neutrality by 2045 or earlier.

Senate Bill 375

SB 375, known as the Sustainable Communities Strategy and Climate Protection Act, was signed into law in September 2008. SB 375 builds upon AB 32 by requiring CARB to develop regional GHG reduction targets for automobile and light truck sectors for 2020 and 2035. The per capita GHG emissions reduction targets for passenger vehicles in the San Francisco Bay Area include a seven percent reduction by 2020 and a 15 percent reduction by 2035.

Consistent with the requirements of SB 375, the Metropolitan Transportation Commission (MTC) partnered with the Association of Bay Area Governments (ABAG), BAAQMD, and the Bay Conservation and Development Commission to prepare the region's Sustainable Communities Strategy (SCS) as part of the Regional Transportation Plan process. The SCS is referred to as Plan Bay Area 2050. Plan Bay Area 2050 establishes a course for reducing per capita GHG emissions

through the promotion of compact, high-density, mixed-use neighborhoods near transit, particularly within identified Priority Development Areas (PDAs).

California Building Standards Code

The California Building Energy Efficiency Standards (California Energy Code) is under Title 24, Part 6 and is overseen by the California Energy Commission (CEC). This code includes design requirements to conserve energy in new residential and non-residential developments, while being cost effective for homeowners. This Energy Code is enforced and verified by cities during the planning and building permit process. The current energy efficiency standards (2019 Energy Code) replaced the 2016 Energy Code as of January 1, 2020.

The California Green Building Standards Code (CALGreen Code) is part of the California Building Standards Code under Title 24, Part 11. The CALGreen Code provides sustainable construction standards that involve planning/design, energy efficiency, water efficiency resource efficiency, and environmental quality. These green building standard codes are mandatory statewide and are applicable to residential and non-residential developments. The most recent CALGreen Code (2019 California Building Standard Code) was effective as of January 1, 2020.

Requirements for electric vehicle (EV) charging infrastructure are set forth in Title 24 of the California Code of Regulations and are regularly updated on a 3-year cycle. The CALGreen standards consist of a set of mandatory standards required for new development, as well as two more voluntary standards known as Tier 1 and Tier 2. The CalGreen standards have recently been updated (2022 version) to require deployment of additional EV chargers in various building types, including multifamily residential and nonresidential land uses. They include requirements for both EV capable parking spaces and the installation of Level 2 EV supply equipment for multifamily residential and nonresidential buildings. The 2022 CALGreen standards include requirements for both EV readiness and the actual installation of EV chargers. The 2022 CALGreen standards include both mandatory requirements and more aggressive voluntary Tier 1 and Tier 2 provisions.

Regional and Local

Bay Area Air Quality Management District

BAAQMD is the regional government agency that regulates sources of air pollution within the nine San Francisco Bay Area counties. The BAAQMD regulates GHG emissions through the following plans, programs, and guidelines.

2017 Clean Air Plan

To protect the climate, the 2017 CAP (prepared by BAAQMD) includes control measures designed to reduce emissions of methane and other super-GHGs that are potent climate pollutants in the near-term, and to decrease emissions of carbon dioxide by reducing fossil fuel combustion.

CEQA Air Quality Guidelines

The BAAQMD CEQA Air Quality Guidelines are intended to serve as a guide for those who prepare or evaluate air quality impact analyses for projects and plans in the San Francisco Bay Area. The jurisdictions in the San Francisco Bay Area Air Basin utilize the thresholds and methodology for

assessing GHG impacts developed by BAAQMD within the CEQA Air Quality Guidelines. The guidelines include information on legal requirements, BAAQMD rules, methods of analyzing impacts, and recommended mitigation measures.

CEQA Thresholds of Significance for Climate Impacts

The BAAQMD CEQA Air Quality Guidelines (see discussion above) also included thresholds of significance for greenhouse gas emissions. For projects that are not located within a jurisdiction with an adopted GHG Reduction Strategy or projects that would be inconsistent with an adopted GHG Reduction Strategy, the Guidelines recommended a GHG emissions threshold of 1,100 metric tons (MT) or 4.6 MT per year per capita. These thresholds were developed based on meeting the 2020 GHG target of reducing statewide GHG emissions 80 percent below 1990 levels as set forth in the scoping plan that addressed AB 32. Interpolation of the 2020 GHG target through the year 2031 (when buildout of the Housing Element Update would be complete) results in a GHG emissions significance threshold of 2.7 MTCO_{2e} per year per capita.

On April 20, 2022, BAAQMD adopted new qualitative thresholds for assessing the impacts that projects and plans would have on climate change. BAAQMD provided a justification report that described these new qualitative thresholds that are recommended for lead agencies to consider when approving projects or plans through the CEQA process.⁷³

For land use projects, BAAQMD developed plan- and project-level thresholds that evaluate the significance of operational GHG emissions based on its effect on the State's efforts to meet the identified long-term climate goals. These thresholds are identified in Table 4.8-1 below.

Table 4.8-1: BAAQMD GHG Significance Thresholds	
Plan-Level Thresholds	
A. Meet the State's goals to reduce emissions to 40 percent below 1990 levels by 2030 and carbon neutrality by 2045; or	
B. Be consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b).	
Project-Level Thresholds	
A. Projects must include, at a minimum, the following project design elements:	
1. Buildings	
a. The project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development).	
b. The project will not result in any wasteful, inefficient, or unnecessary energy usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines.	
2. Transportation	
a. Achieve a reduction in project-generated vehicle miles traveled (VMT) below the regional average consistent with the current version of the California Climate Change Scoping Plan	

⁷³ Bay Area Air Quality Management District. *CEQA Thresholds for Evaluating the Significance of Climate Impacts from Land Use Projects and Plans*. April 2022.

(currently 15 percent) or meet a locally adopted Senate Bill 743 VMT target, reflecting the recommendations provided in the Governor’s Office of Planning and Research’s Technical Advisory on Evaluating Transportation Impacts.

b. Achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.

B. Be consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b).

City of San Bruno General Plan

Various policies in the City’s General Plan have been adopted for the purpose of avoiding or mitigating greenhouse gas emissions impacts resulting from planned development within the City, including the following:

Policies	Description
T-F	Provide efficient local transit—such as a shuttle system—to the BART and Caltrain stations to avoid dependence on individual motor vehicles.
ERC-13	Through environmental review, assure that all projects affecting resources of regional concern (e.g., the San Francisco garter snake habitat, water and air quality, the San Francisco Fish and Game Reserve) satisfy regional, State and federal laws.
ERC-25	Maintain and improve air quality by requiring project mitigation, such as Transportation Demand Management (TDM) techniques, where air quality impacts are unavoidable.
ERC-31	<p>Prepare a Greenhouse Gas Emissions Reduction Plan, focusing on feasible actions the City can take to minimize the adverse impacts of Plan implementation on climate change and air quality. The Plan will include but will not be limited to:</p> <ul style="list-style-type: none"> • An inventory of all known, or reasonably discoverable, sources of greenhouse gases (GHGs) that currently exist in the City and sources that existed in 1990. In determining what is a source of GHG emissions, the City may rely on the definition of “greenhouse gas emissions source” or “source” as defined in section 38505 of the California Global Warming Solutions Act (“AB 32”) or its governing regulations. The inventory may include estimates of emissions drawing on available information from State and regional air quality boards, supplemented by information obtained by the City. • A projected inventory of the new GHGs that can reasonably be expected to be emitted in the year 2025 due to the City’s discretionary land use decisions pursuant to the 2025 General Plan Update, as well as new GHGs emitted by the City’s internal government operations. The projected inventories will include estimates, supported by substantial evidence, of future emissions from planned land use and information from state and regional air quality boards and agencies. • A target for the reduction of those sources of future emissions reasonably attributable to the City’s discretionary land use decisions under the 2025 General Plan and the City’s internal government operations, and feasible GHG emission reduction measures whose purpose shall be to meet this reduction target by regulating those sources of GHG emissions reasonably attributable to the City’s discretionary land use decisions and the City’s internal government operations.

Policies	Description
ERC-33	Require all large construction projects to mitigate diesel exhaust emissions through use of alternate fuels and control devices.

Transit Corridors Plan

As noted in Section 3.1.1.1, Housing Opportunity Sites 1, 2, 4, 5, 7, 9, 11, 12, 15, 17, 20, 21, 22, and 23 are located within the TCP area. Chapter Seven of the TCP includes the following policies designed to reduce emissions associated with vehicle traffic.

Policies	Description
Trans-F	Develop and implement a Transportation Demand Management (TDM) Program that reduces the amount of peak period motor vehicle traffic and encourages the use of modes other than the single-occupant vehicle.
Trans B-1	Provide a local circulator shuttle service between the Downtown, BART station, and Caltrain station, with potential stops at the San Francisco International Airport
Trans C-2	Provide a network of bicycle priority streets that provide linkages throughout the Plan area. As appropriate, bicycle priority streets should provide traffic-calming measures to limit vehicle travel and speeds.
Trans C-4	Implement a citywide bicycle parking ordinance that specifies bicycle parking, locker, and shower requirements.

Bayhill Specific Plan

As noted in Section 3.1.1.1, Housing Opportunity Sites 3 and 13 are located within the Bayhill Specific Plan area. In addition to the Bayhill Specific Plan policies designed to reduce air quality impacts (refer to Section 4.3.1.2), Chapter Six of the Bayhill Specific Plan includes mandatory “Environmental Quality Policies”, including the following which pertain to greenhouse gas emissions.

Policy 6-14

Policy 6-14 requires all future development within the Bayhill Specific Plan area to reduce construction-related GHG emissions by implementing the recommended best management practices provided in BAAQMD’s 2017 CEQA Guidelines.

Policy 6-15

Policy 6-15 requires all future development within the Bayhill Specific Plan to achieve LEED Silver Certification or equivalent, use electric space and water heaters, employ solar panels on 30 percent of the roof, and implement recycling and reusable produce use programs.

Policy 6-16

Policy 6-16 requires all future development within the Bayhill Specific Plan that does not comply with Policy 6-15 to purchase GHG mitigation credits equivalent to the GHG emissions reductions that would be provided by implementation of Policy 6-15.

Policy 6-17

Policy 6-17 encourages building owners within the Bayhill Specific Plan to engage in PG&E Energy Efficiency and/or San Mateo County Energy Efficiency programs.

4.8.1.3 *Existing Conditions*

Unlike emissions of criteria and toxic air pollutants, which have regional and local impacts, emissions of GHGs have a broader, global impact. Global warming is a process whereby GHGs accumulating in the upper atmosphere contribute to an increase in the temperature of the earth and changes in the weather patterns.

The U.S. EPA reported that in 2018, total gross nationwide GHG emissions were 6,676.6 million metric tons (MMT) carbon dioxide equivalent (CO₂e).⁷⁴ These emissions were lower than peak levels of 7,416 MMT that were emitted in 2007. CARB updates the statewide GHG emission inventory on an annual basis where the latest inventory includes 2000 through 2017 emissions.⁷⁵ In 2017, GHG emissions from statewide emitting activities were 424 MMT. The 2017 emissions have decreased by 14 percent since peak levels in 2004 and are 7 MMT below the 1990 emissions level and the State's 2020 GHG limit. Per capita GHG emissions in California have dropped from a 2001 peak of 14.1 MT per person to 10.7 MT per person in 2017. The most recent Bay Area emission inventory was computed for the year 2011.⁷⁶ The Bay Area GHG emissions were 87 MMT. As a point of comparison, statewide emissions were about 444 MMT in 2011.

4.8.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
1) Generate greenhouse gas (GHG) emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

⁷⁴ United States Environmental Protection Agency. *Inventory of U.S. Greenhouse Gas Emissions and Sinks 1990-2018*. Accessed October 24, 2022. <https://www.epa.gov/sites/production/files/2020-04/documents/us-ghg-inventory-2020-main-text.pdf>

⁷⁵ California Air Resources Board. *2019 Edition, California Greenhouse Gas Emission Inventory: 2000 – 2017*. Accessed October 24, 2022. https://ww3.arb.ca.gov/cc/inventory/pubs/reports/2000_2017/ghg_inventory_trends_00-17.pdf

⁷⁶ Bay Area Air Quality Management District. *Bay Area Emissions Inventory Summary Report: Greenhouse Gases Base Year 2011*. Accessed October 24, 2022. http://www.baaqmd.gov/~media/files/planning-and-research/emission-inventory/by2011_ghgsummary.pdf

4.8.2.1 *Approach to Greenhouse Gas Emissions Analysis*

The discussion under Impact GHG-1 evaluates whether the GHG emissions generated by buildout of all Housing Opportunity Sites at the densities assumed by the Housing Element Update would exceed a 2.7 MTCO₂e per year per capita threshold (refer to the discussion in Section 4.8.1.2 under “CEQA Thresholds of Significance for Climate Impacts”). Additionally, since the City of San Bruno does not have an adopted GHG Reduction Strategy, the discussion under Impact GHG-2 assesses, based on the latest BAAQMD thresholds of significance for climate impacts, whether the project would meet the State’s goals to reduce emissions to 40 percent below 1990 levels by 2030 and carbon neutrality by 2045. Consistent with this approach, the discussion under Impact GHG-2 analyzes whether the Housing Element Update as a whole would conflict with AB 32, SB 32, Senate Bill 375 and Plan Bay Area 2050, and the 2017 Clean Air Plan.

Impact GHG-1: The project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. **(Less than Significant Impact with Mitigation Incorporated)**

Construction-Related GHG Emissions

Construction of future development under the Housing Element Update would result in the temporary generation of GHG emissions. Emissions would originate from mobile and stationary construction equipment exhaust and employee and haul truck vehicle exhaust. Construction-related GHG emissions would vary substantially depending on the level of activity, length of the construction period, specific construction operations, types of equipment, and number of personnel.

BAAQMD has not established a quantitative threshold for assessing construction-related GHG emissions. Rather, BAAQMD recommends evaluating whether construction activities would conflict with statewide emission reduction goals and implement feasible Best Management Practices. Mitigation Measure GHG-1.1 below would require future development under the Housing Element Update to comply with these measures; accordingly, construction of future development would not generate GHG emissions that would have a significant impact on the environment. **(Less than Significant Impact with Mitigation Incorporated)**

Mitigation Measures:

MM GHG-1.1: Prior to approval, the 2023-2031 Housing Element shall include a policy requiring applicants and their contractors to implement the following measures prior to and during construction:

- a. Prior to issuance of any discretionary permits that would allow demolition or construction (grading, excavation, building, etc.) activities at the Housing Opportunity Sites, the applicant shall submit a construction management plan that demonstrates that:
 - Alternative fueled (e.g. biodiesel, electric) construction vehicles/equipment shall make up at least 15 percent of the fleet;

- Buildings shall be constructed with local building materials of at least 10 percent (sourced from within 100 miles of the City limits); and
- Contractors shall recycle and reuse at least 50 percent of construction waste or demolition materials.

Operational-Related GHG Emissions

Buildout of the Housing Opportunity Sites identified in Table 3.2-1 at the densities assumed by the Housing Element Update would result in the construction of 2,709 housing units, including an estimated six single-family residences, 967 low-rise apartment units, and 1,735 mid-rise apartment units.⁷⁷ GHG emissions generated by buildout of all the Housing Opportunity Sites through the year 2031 was estimated using the California Emissions Estimator Model (CalEEMod) Version 2020.4.0 and compared to the 2.7 MTCO₂e per year per capita threshold identified in Sections 4.8.1.2 and 4.8.2.1 above. The methodology, data inputs, assumptions, and results are described further in Appendix A. Table 4.8-2 below shows the annual and per year per capita emissions resulting from operation of future development under the Housing Element Update.

⁷⁷At the time of analysis, the technical studies prepared for the Housing Element Update assumed buildout would result in six single-family residences, 967 low-rise apartment units, and 1,735 mid-rise apartment units. The City now anticipates that buildout of the Housing Element Update would result in 138 single-family detached, 836 low-rise apartment, and 1,735 mid-rise apartment units, which corresponds with an additional 363 daily vehicle trips. This represents an increase of approximately two percent in the number of vehicle trips, which the Air Quality, Greenhouse Gas Emissions, Noise, Vibration, and Transportation consultants have confirmed would not change the conclusions presented in this Initial Study and Appendices A, B, and C. Appendix D and the associated water supply analysis are unaffected by this change.

Table 4.8-2: Calculated GHG Emissions of the Housing Element Update	
Source Category	GHG Emissions (MTCO₂e)
Area	139
Energy Consumption	1,812
Mobile	7,032
Solid Waste Generation	629
Water Usage	240
Total MTCO ₂ e	9,852
Project Population ¹	7,150 ²
Project Per Year Per Capita Emissions	1.38 MTCO ₂ e/year/per capita
<i>Significance Threshold</i>	2.7 MTCO₂e/year/per capita
Exceed Threshold?	No
Source: Illingworth & Rodkin, Inc. <i>San Bruno 2023-2031 Housing Element Update Air Quality & Greenhouse Gas Assessment</i> . September 14, 2022. Notes: ¹ Refer to Section 4.14 Population and Housing of this Initial Study. ² After completion of the analysis presented in this Initial Study, the number of units assumed at Sites 8 and 21 increased by one unit each, the number of units assumed at Site 22 decreased by one unit, and the number of pipeline units decreased by one unit, resulting in a net increase of one unit and two residents assumed at the Housing Opportunity Sites (2,708 units versus 2,709 units, 7,150 residents versus 7,152 residents) and no increase in the total number of units and residents assumed for the Housing Element Update as a whole (3,618 units and 9,552 residents total). This change would not affect any of the conclusions presented herein this Initial Study.	

As shown in Table 4.8-2, GHG emissions generated by buildout of the Housing Element Update would not generate GHG emissions in excess of the interpolated 2031 MTCO₂e per year per capita threshold. Further, the emissions reported in Table 4.8-2 are conservative, since they do not take into account the GHG emissions generated by existing uses or the GHG reductions that would be achieved with adherence to the policies and mitigation measures identified in the General Plan, TCP, and Bayhill Specific Plan and their associated EIRs. Therefore, the project would support state goals for reducing emissions to 40 percent below 1990 levels by 2030.

As noted in the 2022 CARB Scoping Plan, approximately 35 percent of California's GHG reduction potential is from local activities that local governments have authority over.⁷⁸ Accordingly, while reducing GHG emissions associated with private development is a critical component in achieving carbon neutrality, even reducing GHG emissions associated with private development to net zero through direct mitigation or purchase of equivalent GHG credits (which would be economically infeasible) cannot by itself achieve carbon neutrality. As discussed above, GHG emissions generated by buildout of the Housing Opportunity Sites at the densities assumed in the Housing Element would be well below the interpolated 2031 MTCO₂e per year per capita threshold, demonstrating that the project is aligned with the state's goal of achieving carbon neutrality. Future development under the

⁷⁸ California Air Resources Board. *Draft 2022 Scoping Plan Update, Appendix D*. May 10, 2022.

Housing Element Update can further support the state’s goal of carbon neutrality with implementation of the following mitigation measure.

Mitigation Measures:

MM GHG-1.2: Prior to approval, the 2023-2031 Housing Element shall include a policy requiring future development at all Housing Opportunity Sites to demonstrate adherence with the following design measures prior to issuance of any discretionary permits that would allow construction of residential units:

- a. Construction of natural gas infrastructure and the use of natural gas appliances shall be prohibited;
- b. Future developments shall include all electric appliances;
- c. At a minimum, future development shall comply with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2 requirements.

Application of the design measures identified in MM GHG-1.2 would ensure that all future residential development under the Housing Element Update would be consistent with BAAQMD’s project-level thresholds for building design. Additionally, as discussed in Section 4.17 Transportation under Impact TRN-2, buildout of the Housing Element Update would reduce VMT by 0.07 VMT per capita, and all future development would result in a VMT per resident 15 percent or greater below the regional average. Accordingly, future development under the Housing Element Update would be consistent with the plan- and project-level thresholds set forth by BAAQMD that are designed to support the State’s long-term goal of carbon neutrality. For these reasons, the project would not generate GHG emissions that would have a significant impact on the environment. **(Less than Significant Impact with Mitigation Incorporated)**

Impact GHG-2: The project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. **(Less than Significant Impact)**

AB 32 and SB 32

AB 32 as originally adopted in 2006 set forth targets that would reduce statewide GHG emissions to 1990 levels by 2020. SB 32 amended AB 32 and set forth targets to reduce statewide GHG emissions to 40 percent below the 1990 level by 2030. As discussed under Impact GHG-1, the project supports the State’s short-term goal of achieving a 40 percent reduction in GHG emissions below 1990 levels by 2030. Further, the Housing Element Update would support the State’s long-term goal of achieving carbon neutrality by 2045. Accordingly, the project would not conflict with AB 32 or SB 32. **(Less than Significant Impact)**

SB 375 and Plan Bay Area 2050

As discussed in Section 4.8.1.2, Plan Bay Area 2050 is the SB 375-mandated SCS for the nine-county Bay Area region, which encompasses the City of San Bruno. Plan Bay Area 2050 establishes

a course for reducing per capita GHG emissions through the promotion of compact, high-density, mixed-use neighborhoods near transit, particularly within identified Priority Development Areas (PDAs).

With the exception of Housing Opportunity Sites 6 and 8, all of the Housing Opportunity Sites are located within a PDA.⁷⁹ The Transportation Analysis (refer to Appendix C) analyzed the VMT generated by future development at Sites 6 and 8, and found that the VMT per resident would be 15 percent below the regional average or greater. As a whole, the Housing Element Update would reduce VMT by 0.07 VMT per resident. Further, the Housing Element Update addresses the City's regional housing needs allocation upon which Plan Bay Area 2050 is based; therefore the project directly supports implementation of Plan Bay Area 2050 and by extension, SB 375. **(Less than Significant Impact)**

2017 Clean Air Plan

As discussed in detail in Section 4.4 Air Quality under Impact AIR-1, the Housing Element Update is consistent with the 2017 Clean Air Plan. **(Less than Significant Impact)**

2022 CARB Scoping Plan

As discussed under Impact GHG-1, the project supports the State's short-term goal of achieving a 40 percent reduction in GHG emissions below 1990 levels by 2030 and the State's long-term goal of achieving carbon neutrality. Therefore, the project would not conflict with the 2022 CARB Scoping Plan. **(Less than Significant Impact)**

⁷⁹ Metropolitan Transportation Commission. "Priority Development Areas (Plan Bay Area 2050)". Accessed October 6, 2022. <https://opendata.mtc.ca.gov/datasets/priority-development-areas-plan-bay-area-2050>

4.9 HAZARDS AND HAZARDOUS MATERIALS

4.9.1 Environmental Setting

4.9.1.1 *Regulatory Framework*

Overview

The storage, use, generation, transport, and disposal of hazardous materials and waste are highly regulated under federal and state laws. In California, the EPA has granted most enforcement authority over federal hazardous materials regulations to the California Environmental Protection Agency (CalEPA). In turn, local agencies have been granted responsibility for implementation and enforcement of many hazardous materials regulations under the Certified Unified Program Agency (CUPA) program.

Worker health and safety and public safety are key issues when dealing with hazardous materials. Proper handling and disposal of hazardous material is vital if it is disturbed during project construction. Cal/OSHA enforces state worker health and safety regulations related to construction activities. Regulations include exposure limits, requirements for protective clothing, and training requirements to prevent exposure to hazardous materials. Cal/OSHA also enforces occupational health and safety regulations specific to lead and asbestos investigations and abatement.

Federal and State

Federal Aviation Regulations Part 77

Federal Aviation Regulations, Part 77 Objects Affecting Navigable Airspace (FAR Part 77) sets forth standards and review requirements for protecting the airspace for safe aircraft operation, particularly by restricting the height of potential structures and minimizing other potential hazards (such as reflective surfaces, flashing lights, and electronic interference) to aircraft in flight. These regulations require that the Federal Aviation Administration (FAA) be notified of certain proposed construction projects located within an extended zone defined by an imaginary slope radiating outward for several miles from an airport's runways, or which would otherwise stand at least 200 feet in height above the ground.

Comprehensive Environmental Response, Compensation, and Liability Act

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as Superfund, was enacted by Congress on December 11, 1980. This law created a tax on the chemical and petroleum industries and provided broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. Over five years, \$1.6 billion was collected and the tax went to a trust fund for cleaning up abandoned or uncontrolled hazardous waste sites. CERCLA accomplished the following objectives:

- Established prohibitions and requirements concerning closed and abandoned hazardous waste sites;

- Provided for liability of persons responsible for releases of hazardous waste at these sites; and
- Established a trust fund to provide for cleanup when no responsible party could be identified.

The law authorizes two kinds of response actions:

- Short-term removals, where actions may be taken to address releases or threatened releases requiring prompt response; and
- Long-term remedial response actions that permanently and significantly reduce the dangers associated with releases or threats of releases of hazardous substances that are serious, but not immediately life-threatening. These actions can be completed only at sites listed on the EPA's National Priorities List.

CERCLA also enabled the revision of the National Contingency Plan (NCP). The NCP provided the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants. The NCP also established the National Priorities List. CERCLA was amended by the Superfund Amendments and Reauthorization Act on October 17, 1986.⁸⁰

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA), enacted in 1976, is the principal federal law in the United States governing the disposal of solid waste and hazardous waste. RCRA gives the EPA the authority to control hazardous waste from the “cradle to the grave.” This includes the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA also sets forth a framework for the management of non-hazardous solid wastes.

The Federal Hazardous and Solid Waste Amendments (HSWA) are the 1984 amendments to RCRA that focused on waste minimization, phasing out land disposal of hazardous waste, and corrective action for releases. Some of the other mandates of this law include increased enforcement authority for the EPA, more stringent hazardous waste management standards, and a comprehensive underground storage tank program.⁸¹

Government Code Section 65962.5

Section 65962.5 of the Government Code requires CalEPA to develop and update a list of hazardous waste and substances sites, known as the Cortese List. The Cortese List is used by state and local agencies and developers to comply with CEQA requirements. The Cortese List includes hazardous substance release sites identified by the Department of Toxic Substances Control (DTSC) and State Water Resources Control Board (SWRCB).⁸²

⁸⁰ United States Environmental Protection Agency. “Superfund: CERCLA Overview.” Accessed October 24, 2022. <https://www.epa.gov/superfund/superfund-cercla-overview>.

⁸¹ United States Environmental Protection Agency. “Summary of the Resource Conservation and Recovery Act.” Accessed October 22, 2022. <https://www.epa.gov/laws-regulations/summary-resource-conservation-and-recovery-act>.

⁸² California Environmental Protection Agency. “Cortese List Data Resources.” Accessed October 24, 2022. <https://calepa.ca.gov/sitecleanup/corteselist/>.

Toxic Substances Control Act

The Toxic Substances Control Act (TSCA) of 1976 provides the EPA with authority to require reporting, record-keeping and testing requirements, and restrictions relating to chemical substances and/or mixtures. Certain substances are generally excluded from TSCA, including, among others, food, drugs, cosmetics, and pesticides. The TSCA addresses the production, importation, use, and disposal of specific chemicals including polychlorinated biphenyls (PCBs), asbestos, radon, and lead-based paint.

California Accidental Release Prevention Program

The California Accidental Release Prevention (CalARP) Program aims to prevent accidental releases of regulated hazardous materials that represent a potential hazard beyond the boundaries of a property. Facilities that are required to participate in the CalARP Program use or store specified quantities of toxic and flammable substances (hazardous materials) that can have off-site consequences if accidentally released. The San Mateo County Environmental Health Services Department reviews CalARP risk management plans as the CUPA.

Asbestos-Containing Materials

Friable asbestos is any asbestos-containing material (ACM) that, when dry, can easily be crumbled or pulverized to a powder by hand, allowing the asbestos particles to become airborne. Common examples of products that have been found to contain friable asbestos include acoustical ceilings, plaster, wallboard, and thermal insulation for water heaters and pipes. Common examples of non-friable ACMs are asphalt roofing shingles, vinyl floor tiles, and transite siding made with cement. The EPA began phasing out use of friable asbestos products in 1973 and issued a ban in 1978 on manufacture, import, processing, and distribution of some asbestos-containing products and new uses of asbestos products.⁸³ The EPA is currently considering a proposed ban on ongoing use of asbestos.⁸⁴ National Emission Standards for Hazardous Air Pollutants (NESHAP) guidelines require that potentially friable ACMs be removed prior to building demolition or remodeling that may disturb the ACMs.

HSC Division 13, Section 19827.5

California Health and Safety Code Section 19827.5 prohibits the issuance of demolition permits prior to the receipt of a written asbestos notification confirming that the building that has been submitted to the United States Environmental Protection Agency or to a designated state agency, or both, pursuant to Part 61 of Title 40 of the Code of Federal Regulations, or the successor to that part. The permit may be issued without the applicant submitting a copy of the written notification if the applicant declares that the notification is not applicable to the scheduled demolition project.

⁸³ United States Environmental Protection Agency. "EPA Actions to Protect the Public from Exposure to Asbestos." Accessed October 24, 2022. <https://www.epa.gov/asbestos/epa-actions-protect-public-exposure-asbestos>

⁸⁴ Ibid.

CCR Title 8, Section 1532.1

The United States Consumer Product Safety Commission banned the use of lead-based paint in 1978. Removal of older structures with lead-based paint is subject to requirements outlined by the Cal/OSHA Lead in Construction Standard, CCR Title 8, Section 1532.1 during demolition activities. Requirements include employee training, employee air monitoring, and dust control. If lead-based paint is peeling, flaking, or blistered, it is required to be removed prior to demolition.

Regional and Local

Municipal Regional Permit Provision C.12.f

Polychlorinated biphenyls (PCBs) were produced in the United States between 1955 and 1978 and used in hundreds of industrial and commercial applications, including building and structure materials such as plasticizers, paints, sealants, caulk, and wood floor finishes. In 1979, the EPA banned the production and use of PCBs due to their potential harmful health effects and persistence in the environment. PCBs can still be released to the environment today during demolition of buildings that contain legacy caulks, sealants, or other PCB-containing materials.

With the adoption of the San Francisco Bay Region Municipal Regional Stormwater National Pollutant Discharge Elimination System (NPDES) Permit (MRP) by the San Francisco Bay Regional Water Quality Control Board on November 19, 2015, Provision C.12.f requires that permittees develop an assessment methodology for applicable structures planned for demolition to ensure PCBs do not enter municipal storm drain systems.⁸⁵ Municipalities throughout the Bay Area are currently modifying demolition permit processes and implementing PCB screening protocols to comply with Provision C.12.f. Buildings constructed between 1950 and 1980 that are proposed for demolition must be screened for the presence of PCBs prior to the issuance of a demolition permit. Single-family homes and wood-frame structures are exempt from these requirements.

Bay Area Air Quality Management District

BAAQMD is vested with authority to regulate airborne pollutants through both inspection and law enforcement, and is to be notified 10 days in advance of any proposed demolition or abatement work. The BAAQMD regulates the demolition of buildings and structures that may contain asbestos. The provisions that cover these operations are found in BAAQMD Regulation 11, Rule 2: Hazardous Materials; Asbestos Demolition, Renovation and Manufacturing. Individual project contractors are required to implement standard state and federal procedures for asbestos containment and worker safety. The demolition or removal of asbestos-containing building materials is subject to the limitations of BAAQMD Regulation 11, Rule 2. The rule requires special handling of asbestos-containing material (e.g., by keeping materials continuously wetted). Rule 2 prohibits any visible emissions of asbestos-containing material to outside air. Individual project applicants are required to consult with the BAAQMD's Enforcement Division prior to commencing demolition of a building containing asbestos materials.

⁸⁵ California Regional Water Quality Control Board. *San Francisco Bay Region Municipal Regional Stormwater NPDES Permit*. November 2015.

San Mateo County Comprehensive Airport Land Use Plan

The ALUCP for the Environs of the San Francisco International Airport (SFO), prepared by the City/County Association of Governments of San Mateo County (C/CAG), is a State-mandated land use compatibility plan that addresses the compatibility of surrounding land uses in local jurisdictions with airport operations.

The ALUCP establishes safety compatibility policies to protect public health and safety by minimizing the public’s exposure to the risk associated with potential aircraft accidents in the airport vicinity. The ALUCP identifies five safety compatibility zones in the vicinity of SFO.

The ALUCP also establishes airport vicinity height limitations to protect public safety, health, and welfare by ensuring that aircraft can safely fly in the airspace around an airport and to protect the operational capability of airports. As noted in the ALUCP, the height of new development must be maintained below critical aeronautical surfaces.

Noise compatibility policies described within the ALUCP are intended to minimize the exposure of residents and occupants of future noise-sensitive development to excessive noise. CNEL noise contours identify areas where noise exposure is great enough to warrant land use controls to promote noise compatibility. The ALUCP includes forecasted 2015 and 2020 CNEL noise contours. Included in the ALUCP are policies and standards to protect people living in the vicinity of SFO from the effects of aircraft noise. Policy NP-2, Airport/Land Use Compatibility Criteria, establishes criteria to determine the compatibility of proposed land uses in the Airport Noise Compatibility Zones. Commercial uses, including office and general retail, are considered compatible with noise levels up to 75 dB. Public and institutional uses are generally considered to be conditionally compatible with noise levels up to 70 dB and generally incompatible with noise levels above 70 dB. Residential uses are compatible with noise levels below 65 dB, conditionally compatible with noise levels between 65 and 70 dB, and generally incompatible with noise levels in excess of 70 dB.

San Mateo County Office of Emergency Services

The San Mateo County Office of Emergency Services maintains the Countywide Emergency Operations Plan (EOP). Revised in May 2015, the EOP establishes policies and procedures and assigns responsibilities to ensure the effective management of operations in the event of an emergency.

City of San Bruno General Plan

Various policies in the City’s General Plan have been adopted for the purpose of avoiding or mitigating impacts of hazards and hazardous materials resulting from planned development within the City, including the following:

Policies	Description
LUD-E	Ensure that new development, especially in residential neighborhoods, is sensitive to existing uses, and is of the highest quality design and construction.

Policies	Description
LUD-76	Assure that new development mitigates impacts on existing public services, including transit services, water, sewer, and storm drainage systems, police and fire protection, libraries, and parks and recreation facilities.
OSR-33	Balance fire prevention goals with the preservation of the mature tree stands along the city's scenic corridors, including Sneath Lane, Skyline Boulevard, I-280, and Crystal Springs Road, consistent with the Tree Preservation Ordinance and Ordinance 1284. Landscaping of public rights-of-way along these corridors should complement the natural state.
ERC-12	Balance the need for fire safety and invasive plant species management with new considerations along the city's scenic corridors. Encourage buildings to be locked outside of the tree's drip-line or 12 feet from the tree trunk, whichever is greater, and/or incorporating special techniques to minimize root damage, etc.
ERC-19	Regulate new development – specifically industrial uses – as well as construction and demolition practices to minimize pollutant and sediment concentrations in receiving waters and ensure waterbodies within San Bruno and surface water discharged into San Francisco Bay meets or exceeds relevant regulatory water quality standards.
ERC-20	Require implementation of Best Management Practices to reduce accumulation of non-point source pollutants in the drainage system originating from streets, parking lots, residential areas, businesses, and industrial operations.
ERC-21	Continue programs to inform residents of the environmental effects of dumping household waste, such as motor oil, into storm drains that eventually discharge into San Francisco Bay.
ERC-22	Regularly measure and monitor water quality in San Bruno's surface water to ensure maintenance of high quality water for consumption by humans and other species throughout the region.
ERC-23	Regulate new development to minimize stormwater runoff rates and volumes generated by impervious surfaces, and maximize recharge of local groundwater aquifers when feasible. Utilize the recommendations provided in the Bay Area Stormwater Management Agency's Start at the Source Design Guidance Manual for Stormwater Quality Protection.
ERC-24	Require that new development incorporate features into site drainage plans that reduce impermeable surface area and surface runoff volumes. Such features may include: <ul style="list-style-type: none"> • Additional landscaped areas including canopy trees and shrubs; Reducing building footprint; • Removing curbs and gutters from streets and parking areas where appropriate to allow stormwater sheet flow into vegetated areas; • Permeable paving and parking area design; • Stormwater detention basins to facilitate infiltration; and • Building integrated or subsurface water retention facilities to capture rainwater for use in landscape irrigation and other non-potable uses.
HS-C	Reduce the potential for damage from seismic hazards through geotechnical analysis, hazard abatement, emergency preparedness, and recovery planning.
HS-E	Ensure the health, safety, and welfare of San Bruno residents by requiring appropriate use, disposal, and transport of hazardous materials.

Policies	Description
HS-G	Ensure that all development heeds safety precautions from the San Francisco International Airport.
HS-23	Ensure appropriate clean-up of all former commercial and industrial sites according to relevant regulatory standards prior to reuse.
HS-24	Control the transport of hazardous substances to minimize potential hazards to the local population. Identify appropriate regional and local routes for transportation of hazardous materials, and require that fire and emergency personnel can easily access these routes for response to spill incidents.
HS-25	Review and revise City regulations regarding manufacturing, storage, and usage of hazardous materials as necessary to minimize potential hazards.
HS-26	Restrict siting of businesses that use, store, process, or dispose of large quantities of hazardous materials in areas subject to seismic fault rupture or strong ground shaking (Figure 7-2).
HS-27	Initiate a public awareness campaign—through flyers, website, and mailings—about household hazardous waste management, control, and recycling through San Mateo County programs and San Bruno Garbage.
HS-28	Require that lead-based paint and asbestos surveys be conducted by qualified personnel prior to structural demolition or renovation, in buildings constructed prior to 1980.
HS-29	Require abatement of lead-based paint and asbestos prior to structural renovation and demolition, and compliance with all State, federal, OSHA, Bay Area Air Quality Management District, and San Mateo County Health, Environmental Health Division rules and regulations.
HS-30	Regulate development on sites with known or suspected contamination of soil and/or groundwater to ensure that construction workers, the public, future occupants, and the environment are adequately protected from hazards associated with contamination, in accordance with federal, State, and local rules, regulations, policies, and guidelines.
HS-31	Require that developers compact infill soil following the removal of underground storage tanks.
HS-37	Require that all sponsors of new housing (residential and senior housing units) record a notice of Fair Disclosure, regarding the proximity of the proposed development to San Francisco International Airport and of the potential impacts of aircraft operation, including noise impacts, per Ordinance 1646 and AB 2776.
HS-39	Pursue mitigation of noise impacts from the San Francisco International Airport to the fullest extent possible. Support and advocate for operational practices, changes to aircraft, new technologies, and physical improvements that would reduce the area in San Bruno impacted by aircraft noise.
HS-40	Prohibit new residential development within the 70+ Airport CNEL areas, as dictated by Airport Land Use Commission infill criteria.
HS-42	Require new residential development within the 65 dBA CNEL SFO noise contour to submit an aviation easement to the airport. Specific aviation easement requirements shall be consistent with the County of San Mateo Comprehensive Airport-Land Use Compatibility Plan for SFO.

Policies	Description
HS-48	Work together with other affected cities, the Airport Land Use Commission, and San Mateo County to achieve further reduction of SFO airport-generated noise and safety concerns.
HS-49	Require all new development to comply with FAR Part 77 and San Mateo County CALUP height restriction and safety compatibility standards, in accordance with Airport Land Use Commission guidelines.
HS-50	Actively and aggressively participate in forums and discussions regarding operations and expansion plans for San Francisco International Airport. Seek local representation on task forces, commissions, and advisory boards established to guide airport policies and programs.
HS-51	Require all new development to comply with FAR Part 77 height restriction standards, in accordance with Airport Land Use Commission guidelines.
PFS-F	Provide adequate public safety services for all San Bruno properties – including police protection, fire suppression, emergency medical care, and emergency management.
PFS-26	Ensure adequate staffing and facilities for the City’s Police and Fire departments to achieve desired levels of service, particularly surrounding transit areas and along urban-interface hazard areas.
PFS-30	Require installation and maintenance of fire protection measures in high-risk and urban-interface areas: <ul style="list-style-type: none"> • Proper siting and access; • Brush clearance (non-fire resistant landscaping 50 feet from structures); • Use of fire resistive materials (pressure-impregnated, fire resistive shingles or shakes); • Landscaping with fire resistive species; and • Installation of early warning systems (alarms and sprinklers).
PFS-31	Ensure adequate fire water pressure as a condition of approval for all new development projects.
PFS-32	Require installation of residential sprinklers in areas with steep slopes and/or diminished access.
PFS-35	Require installation of automatic sprinkler systems in all hotel, motel, and other overnight lodging facilities, in mixed commercial/residential uses, and in apartment buildings of three or more units.
PFS-39	Minimize risks to single-access residential neighborhoods by providing alternative access for fire and other emergency personnel.

Ordinance 1284

Adopted in June 1977, this ordinance limits building heights to 50 feet or three stories unless approved by City voters and prohibits increases of residential densities in areas zoned residential as of 1974.

Ordinance 1446

Adopted in November 1984, Ordinance 1446 gives “the City of San Bruno the authority to approve the enlargement or extension of existing buildings and the construction of new buildings and structures in the Tanforan Park Shopping Center without further voter approval; provided that the height of any such building or structure shall not exceed the height of the tallest building or structure existing at the time of adoption of the ordinance”. The highest structure existing at the time of adoption was the Target building, which is at an elevation of 126 feet and 9 inches AMSL. If any proposed building height exceeds the current allowance, such proposal would require City Council to place such request on a future ballot measure.

Bayhill Specific Plan

As noted in Section 3.1.1.1, Housing Opportunity Sites 3 and 13 are located within the Bayhill Specific Plan area. Chapter Six of the Bayhill Specific Plan includes mandatory “Environmental Quality” policies, including the following which pertain to hazards and hazardous materials.

Policy 6-7

Policy 6-7 requires new development with hazardous materials on site to create digital pre-incident plans. These plans shall be distributed to the San Bruno Fire Department as a condition of approval of a development entitlement prior to the issuance of a certificate of occupancy for the project site.

Policy 6-8

Policy 6-8 requires any dewatering conducted during construction to be subject to review and approval by the County of San Mateo’s Groundwater Protection Program.

4.9.1.2 *Existing Conditions*

General Plan and Municipal Code Conforming Sites

Residential development at the densities proposed by the Housing Element Update (refer to Table 3.2 1) are allowed at Housing Opportunity Sites 6, 8, 10, 16, 18, and 19 under their existing General Plan land use designation and zoning designation, and therefore no General Plan amendments or rezoning is required. The existing conditions at these sites related to hazards and hazardous materials are discussed below.

Housing Opportunity Site 6

Housing Opportunity Site 6 is currently developed with multiple uses, including a privately operated golf driving range, parking lot storage for a private bus operator, and a maintenance building for the San Bruno Park School District. Site 6 is not on the Cortese List.⁸⁶ The nearest school is the Crestmoor Canyon Stratford School, located 0.18-miles south of Site 6. The nearest airport, SFO, is located approximately 2.05 miles east of Site 6, which is beyond the outer boundary of safety compatibility zones and CNEL noise contours established in the ALUCP. Critical aeronautical

⁸⁶ California Environmental Protection Agency. “Cortese List Data Resources.” Accessed October 24, 2022. <https://calepa.ca.gov/sitecleanup/corteselist/>.

surfaces at Site 6 are 150 feet above ground level (AGL) or greater. As shown on Figure 4.20-1, Site 6 is located within a Wildland Fire Hazard Area.

Housing Opportunity Site 8

Housing Opportunity Site 8 is currently developed with the former Edgemont Elementary School campus. Site 8 is not on the Cortese List.⁸⁷ The nearest school is Allen Elementary, located approximately 0.05-miles north of Site 8. SFO is located approximately 1.10-miles east of Site 8, which is located beyond the outer boundary of safety compatibility zones and CNEL noise contours established in the ALUCP. Critical aeronautical surfaces at Site 8 are 150 feet AGL or greater. As shown on Figure 4.20-1, Site 8 is not located within a Wildland Fire Hazard Area or Wildland/Urban Interface Area.

Housing Opportunity Sites 10 and 16

Housing Opportunity Sites 10 and 16 are vacant dirt lots that are located adjacent to each other on San Marco Avenue. Sites 10 and 16 are not on the Cortese List.⁸⁸ The nearest school is the City Park Stratford School located 0.3-miles west of Sites 10 and 16. SFO is located approximately one mile northeast of Sites 10 and 16, which are located beyond the outer boundary of safety compatibility zones and CNEL noise contours established in the ALUCP. Critical aeronautical surfaces at Sites 10 and 16 are 100 feet AGL or greater. As shown on Figure 4.20-1, Sites 10 and 16 are not located within a Wildland Fire Hazard Area or Wildland/Urban Interface Area.

Housing Opportunity Site 18

Housing Opportunity Site 18 is developed with a two-story office building, pedestrian plaza, and surface parking lot. Site 18 is not on the Cortese List.⁸⁹ The nearest school is the El Portal Special Education School, located approximately 0.3-miles west of Site 18. SFO is located approximately 1.3-miles east of Site 18, which is located beyond the outer boundary of the safety compatibility zones established in the ALUCP, but within the 65 dB CNEL noise contour. Critical aeronautical surfaces at Site 18 are 65 feet AGL or greater. As shown on Figure 4.20-1, Site 18 is not located within a Wildland Fire Hazard Area or Wildland/Urban Interface Area.

Housing Opportunity Site 19

Housing Opportunity Site 19 is developed with a single-story pet hospital and surface parking lot. Site 19 is not on the Cortese List.⁹⁰ The nearest school is the El Portal Special Education School, located approximately 0.3-miles west of Site 19. SFO is located approximately 1.10-miles east of Site 19, which is located beyond the outer boundary of the safety compatibility zones established in the ALUCP, but within the 70-75 dB CNEL noise contour. Critical aeronautical surfaces at Site 19 are 65 feet AGL or greater. As shown on Figure 4.20-1, Site 19 is not located within a Wildland Fire Hazard Area or Wildland/Urban Interface Area.

⁸⁷ California Environmental Protection Agency. "Cortese List Data Resources." Accessed October 24, 2022. <https://calepa.ca.gov/sitecleanup/corteselist/>.

⁸⁸ Ibid.

⁸⁹ Ibid.

⁹⁰ Ibid.

Transit Corridors Plan Area Sites

As noted in Section 3.1.1.1, Housing Opportunity Sites 1, 2, 4, 5, 7, 9, 11, 12, 15, 17, 20, 21, 22, and 23 are located within the TCP area. The TCP EIR identified a total of 26 sites that were on the Cortese List, including Housing Opportunity Sites 11, 12, 15, and 23. Since the certification of the TCP EIR in 2012, none of the other Housing Opportunity Sites located within the TCP have been added to the Cortese List.

The eastern boundary of the TCP area is located approximately 0.5-miles west of SFO; all of the Housing Opportunity Sites located within the TCP are located beyond the outer boundary of safety compatibility zones and CNEL noise contours established in the ALUCP. Critical aeronautical surfaces in the TCP area are 100 feet AGL in height or greater.

As shown on Figure 4.20-1, none of the TCP Housing Opportunity Sites are located within a Wildland Fire Hazard Area or a Wildland/Urban Interface Area.

Bayhill Specific Plan Area Sites

As noted in Section 3.1.1.2, Housing Opportunity Sites 3 and 13 are located within the Bayhill Specific Plan area. Sites 3 and 13 are not on the Cortese List.

The eastern boundary of the Bayhill Specific Plan area is located approximately 1.3-miles west of SFO; Sites 3 and 13 are located beyond the outer boundary of safety compatibility zones and CNEL noise contours established in the ALUCP. Critical aeronautical surfaces at Sites 3 and 13 are 150 feet AGL in height or greater.

As shown on Figure 4.20-1, a small portion of Site 3 is within a Wildland/Urban Interface Area, while Site 13 is not located within a Wildland Fire Hazard Area or a Wildland/Urban Interface Area.

Housing Opportunity Site 14

Housing Opportunity Site 14 consists of 1122-1188 El Camino Real/300 Tanforan Shopping Center, which is developed with the Shops at Tanforan shopping mall, and 1292 Huntington Avenue, which is located opposite the Shops at Tanforan across the Sneath Lane/Huntington Avenue intersection and is developed with a vacant paved lot. The original Shops at Tanforan development was originally constructed in 1971; it underwent major renovations in 2005 and the Century Theatre and associated parking lot were added in 2007. The original Shops at Tanforan Development included a variety of retail uses, including a Sears department store and the associated Sears Automotive Center, which were located in the northeast corner of the site to the west of the existing Century Theatre building. 1292 Huntington Avenue has historically been undeveloped.

Historically, Site 14 was used for horse raising and grazing since the early days of the Spanish occupation on the Peninsula. Tanforan Racetrack, which opened in 1899, was the takeoff site of the first flight ever on the West Coast. Tanforan was also the site of the first ever aircraft carrier takeoff and landing in 1911, from the U.S.S. Pennsylvania. The Tanforan Racetrack held races of all types, from horse races to races between cars and airplanes, before it burned down in 1964. In 1965, the site was used as a golf course.

The northeast corner of Site 14 (see Figure 4.9-1) where the former Sears Automotive Center operated is on the List of Leaking Underground Storage Tank (LUST) Sites, which is one of the lists compiled pursuant to Government Code Section 65962.5.⁹¹ Subsurface soil, soil vapor, and groundwater investigations identified soil and soil vapor contaminated within benzene, and groundwater contaminated with light non-aqueous phase liquids (LNAPL).⁹² The primary sources of contamination (underground petroleum storage tanks) were removed in 1985 and 2001; a secondary source of petroleum hydrocarbons was discovered between the San Bruno Police Department building at 1177 Huntington Avenue and the Century Theatre building. This secondary source was remediated between August 2019 and September 2019.⁹³

Site 14's listing is classified as "Open – Verification Monitoring", and a monitoring and sampling program is ongoing to confirm successful completion of site cleanup. As of December 2019, no LNAPLs or sheen has been observed in any of the monitoring wells on-site, and benzene levels have been reduced below the San Mateo County Department of Environmental Health (SMCEHS) target low-threat closure criteria of 1,000 µg/L. Destruction of all remaining monitoring wells and disposal of investigation derived waste, followed by case closure, is expected by December 2023. Future development within the area shown in Figure 4.9-1 would be required to submit a Redevelopment Management Plan that includes 1) an evaluation of whether redevelopment activities will create new exposure pathways to human health and the environment that pose unacceptable risks, and, if so, how those risks will be mitigated, and 2) a discussion of how contaminated media will be handled and disposed during construction activities.⁹⁴

Site 14 is located 1.10-miles northwest of the runway termination point of SFO, which places Site 14 within the 70-75 dB CNEL noise contour and Safety Compatibility Zone 4. The critical aeronautical surfaces at Site 14 are between 55 to 90 feet AGL, equivalent to 125 to 145 feet AMSL. The nearest school is the El Portal Special Education School, located approximately 0.35-miles west of Site 14. As shown on Figure 4.20-1, a portion of Site 14 is located within a Wildland/Urban Interface Area.

⁹¹ California Environmental Protection Agency. "Cortese List Data Resources." Accessed October 24, 2022. <https://calepa.ca.gov/sitecleanup/corteselist/>.

⁹² Nonaqueous phase liquids (NAPLs) are hydrocarbons that exist as a separate, immiscible phase when in contact with water and/or air. Light nonaqueous phase liquids (LNAPLs) have densities less than that of water. LNAPLs represent potential long-term sources for continued ground-water contamination at many sites. Source: United States Environmental Protection Agency. *Light Nonaqueous Phase Liquids*. June 2015.

⁹³ AECOM. *Corrective Plan Implementation Report*. April 2020.

⁹⁴ Gwinn, Brian. Hazardous Materials Specialist, Groundwater Protection Program, San Mateo County Environmental Health Services Department. Email communication dated September 8, 2022.



SEARS AUTOMOTIVE CENTER SITE	FIGURE 4.9-1
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4.9.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
1) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Impact HAZ-1: The project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. **(Less than Significant Impact)**

Construction of future development under the Housing Element Update would involve the routine transport, use, and disposal of hazardous materials such as fuel, solvents, paints, oils, grease, and caulking. Such transport, use, and disposal must be compliant with the RCRA, U.S. Department of Transportation hazardous materials regulations, and Cal/OSHA regulations. In addition, the San Bruno General Plan contains several policies (refer to Section 4.9.1.2) that ensure hazardous materials are appropriately transported, used, and disposed of. Therefore, the transport, use, or

disposal of hazardous materials during future construction activities would not create a significant hazard to the public or the environment.

Operation and maintenance of residential uses do not involve the use of acutely hazardous materials. Potentially hazardous materials, including cleaning supplies, maintenance chemicals, and herbicides and pesticides for landscape maintenance, can be expected to be used by future residential development at the Housing Opportunity Sites. The transport, use, and disposal of these materials would be subject to the federal, state, and local laws and regulations identified above. Future residential development may include emergency diesel generators to be used in case of emergency; under Health and Safety Code 25507(a)(1)(A), the project would be required to establish and implement a Hazardous Materials Business Plan if the amount of diesel fuel stored on-site exceeds 55 gallons. Adherence with the aforementioned existing laws and regulations would ensure that the routine transport, use, or disposal of hazardous materials by future development under the Housing Element Update would not create a significant hazard to the public or the environment.

Impact HAZ-2: The project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. **(Less than Significant Impact with Mitigation Incorporated)**

Demolition

Based on the age of many of the existing buildings located on the Housing Opportunity Sites, hazardous materials such as ACMs, lead-based paint, and PCBs may be present in building materials. General Plan Policy HS-28 requires lead-based paint and asbestos surveys be conducted prior to building demolition, and General Plan Policy HS-29 requires the abatement of all lead-based paint and asbestos prior to building demolition. Abatement activities would be conducted in accordance with Section 19827.5 of the California Health and Safety Code, BAAQMD regulations (specifically Regulation 11, Rule 2, Hazardous Materials; Asbestos Demolition, Renovation and Manufacturing) and Cal/OSHA requirements. Provision C.12.f of the NPDES MRP requires screening for the presence of PCBs prior to the demolition of any buildings constructed between 1955 and 1980. Accordingly, all lead-based paint, ACMs, and PCBs present in building materials at Site 14 would be identified and disposed of in accordance with the TSCA and General Plan policies HS-24, thus ensuring that demolition of existing buildings at the Housing Opportunity Sites does not create a significant hazard to the public or environment through the release of ACMs, lead-based paint, and PCBs. **(Less than Significant Impact)**

Soil Contamination

General Plan and Municipal Code Conforming Sites

As documented in Section 4.9.1.2, there is no known soil contamination at Housing Opportunity Sites 6, 8, 10, 16, 18, or 19, and none of these sites are on the Cortese List. None of the existing uses at these sites are known sources of soil contamination. However, it is possible that soil contamination associated with past uses of these sites exists. If contaminated soil is present at these sites, ground-disturbing activities could expose construction workers and the public to health hazards from physical contact with contaminated materials or hazardous vapors. Improper handling or storage of

contaminated soil and groundwater can further expose the public to these hazards, or potentially spread contamination through surface water runoff or air-borne dust. In addition, contaminated groundwater can spread downgradient, potentially contaminating subsurface areas of surrounding properties.

Mitigation Measures:

MM HAZ-2.1: Prior to approval, the 2023-2031 Housing Element shall include a policy requiring future development at Housing Opportunity Sites 6, 8, 10, 16, 18, and 19 to comply with the following measure:

- a. The City shall require a Phase I Environmental Site Assessment (Phase I ESA) prior to issuance of any discretionary permits that would allow ground-disturbing activities, with a Phase II ESA also required if the Phase I ESA indicates evidence of potential site contamination. The City shall also require compliance with the site assessment(s) and any remediation, removal, and disposal requirements for soil, surface water, and/or groundwater contamination enforced by the Department of Toxic Substances Control (DTSC), Regional Water Quality Control Board (RWQCB), San Mateo County Department of Environmental Health (SMCEHS), California Division of Occupational Safety and Health (CalOSHA), U.S. Environmental Protection Agency (EPA), and other jurisdictional agencies.

Adherence with MM HAZ-2.1 during construction of future development at Housing Opportunity Sites 6, 8, 10, 16, 18, and 19 would ensure that any contaminated soil present at these sites is identified and remediated in accordance with federal, state, and local regulations and requirements imposed by the DTSC, RWQCB, SMCEHS, CalOSHA, and the EPA. Therefore, future development of Housing Opportunity Sites 6, 8, 10, 16, 18, and 19 would not create a significant hazard to the public or the environment. **(Less than Significant Impact with Mitigation Incorporated)**

Transit Corridors Plan Area Sites

As documented in Section 4.9.1.2, the TCP EIR identified a total of 26 sites in the TCP area that were on the Cortese List, including Housing Opportunity Sites 11, 12, 15, and 23. Since the certification of the TCP EIR in 2012, none of the other Housing Opportunity Sites located within the TCP have been added to the Cortese List. The TCP EIR imposed the following mitigation measure to ensure that future development within the TCP area, including at Sites 1, 2, 4, 5, 7, 9, 11, 12, 15, 17, 20, 21, 22, and 23, would not create a significant hazard to the public or the environment.

- **TCP Mitigation Measure 8-1:** California Department of Toxic Substances Control (DTSC) remedial investigations and actions have occurred or are ongoing on the remaining 11 active sites and 15 closed sites (in some cases, a hazardous materials site closure notice may contain land use restrictions limiting future use of the site as a result of residual contamination that may exist). Development involving disturbance or re-use of one of these 26 sites cannot proceed until required remediation actions have been completed to DTSC satisfaction. The

DTSC may impose land use restrictions, which prevent the use of the property for residential, school, hospital, or day care purposes, on some sites, if warranted. In connection with each discretionary development approval application that the City initially determines could expose construction workers or occupants to hazardous materials contamination related to one of these sites, the City shall require a Phase I environmental site assessment (Phase I ESA) prior to property development, with a Phase II ESA also required if the Phase I ESA indicates evidence of potential site contamination. The City shall also require compliance with the site assessment, remediation, removal, and disposal requirements for soil, surface water, and/or groundwater contamination enforced by the DTSC, Regional Water Quality Control Board (RWQCB), San Mateo County Department of Environmental Health, California Division of Occupational Safety and Health (CalOSHA), U.S. Environmental Protection Agency (EPA), and other jurisdictional agencies.

Consistent with the conclusions of the TCP EIR, adherence with TCP Mitigation Measure 8-1 as required by the TCP EIR would ensure future development under the Housing Element Update at Sites 1, 2, 4, 5, 7, 9, 11, 12, 15, 17, 20, 21, 22, and 23, would not create a significant hazard to the public or the environment. **(Less than Significant Impact)**

Bayhill Specific Plan Area Sites

As documented in Section 4.9.1.2, there is no known soil contamination at Sites 3 and 13, and neither site is on the Cortese List. Future development at Sites 3 and 13 would be required by the General Plan and Specific Plan policies to remove and remediate any contaminated soil encountered during ground-disturbing activities at an approved disposal facility in accordance with federal, state, and local regulatory requirements. Consistent with the conclusions of the Bayhill Specific Plan EIR, adherence with federal, state, and local regulations (refer to Section 4.9.1.1) would ensure that future development of Sites 3 and 13 under the Housing Element Update would not create a significant hazard to the public or the environment. **(Less than Significant Impact)**

Housing Opportunity Site 14

As discussed in Section 4.9.1.2, subsurface soil, soil vapor, and groundwater beneath the northeast corner of Site 14 (refer to Figure 4.9-1) is contaminated with benzene and LNAPLs below SMCEHS thresholds. Per the SMCEHS, remediation has been completed pending the conclusion of a sampling and monitoring program, and destruction of all remaining monitoring wells and disposal of investigation derived waste, followed by case closure, is expected by December 2023. Prior to future development within the area shown in Figure 4.9-1, the SMCEHS would require the project proponent to submit a Redevelopment Management Plan that includes 1) an evaluation of whether redevelopment activities will create new exposure pathways to human health and the environment that pose unacceptable risks, and, if so, how those risks will be mitigated, and 2) a discussion of how contaminated media will be handled and disposed during construction activities.⁹⁵ Accordingly, redevelopment of this portion of Site 14 would not create a significant hazard to the public or the environment.

⁹⁵ Gwinn, Brian. Hazardous Materials Specialist, Groundwater Protection Program, San Mateo County Environmental Health Services Department. Email communication dated September 8, 2022.

The remainder of Site 14 may be contaminated with chemicals used in landscape maintenance and by petroleum hydrocarbons associated with the past use of the site by vehicles and aircraft. Additionally, there may be historic or existing dry-cleaning operations that were or are located in the surrounding area that could have resulted in subsurface contamination of Site 14 with dry cleaning chemicals, such as the chlorinated solvents perchloroethylene (PCE) and trichloroethene (TCE). Contaminated soil, soil vapor, and groundwater encountered and/or disturbed during construction could adversely affect construction workers and nearby sensitive receptors, if appropriate control measures are not implemented.

Mitigation Measures:

MM HAZ-2.2: Prior to approval, the 2023-2031 Housing Element shall include a policy requiring future development at Housing Opportunity Site 14 to comply with the following measures:

- a. Prior to the issuance of any discretionary permits that would allow ground-disturbing activities on Site 14 (outside of the area shown on Figure 4.9-1), the project proponent shall obtain a Phase I Environmental Site Assessment (ESA). The Phase I ESA shall be conducted in accordance with the United States Environmental Protection Agency's All Appropriate Inquiries (AAI) Rule and the latest American Society for Testing and Materials (ASTM International) guidelines, and identify all potential subsurface contaminants warranting further investigation.
- b. If the Phase I ESA identifies any potential contaminants warranting further investigation, a Phase II ESA shall be prepared in accordance with the United States Environmental Protection Agency's AAI Rule and the latest ASTM International guidelines. As part of the Phase II, a qualified environmental professional (as defined in Title 40 of the California Code of Regulations) shall take soil, soil vapor, and groundwater samples as determined necessary by the environmental professional in the area of proposed disturbance at 0.5 feet below ground surface (bgs) to the maximum proposed depth of disturbance. Collected soil samples shall be tested for all potential contaminants identified in the Phase I ESA to determine if contaminants exceed California Division of Occupational Safety and Health (Cal/OSHA) exposure limits or San Mateo County Environmental Health Services (SMCEHS) environmental screening levels for residential uses.
- c. The results of the Phase II ESA shall be provided SMCEHS department. If determined necessary by the SMCEHS, a Redevelopment Management Plan (RMP) or equivalent shall be prepared and submitted to the SMCEHS and the Director of Community and Economic Development or the Director's designee that includes 1) an evaluation of whether redevelopment activities will create new exposure pathways to human health and the environment that pose unacceptable risks, and, if so, how those risks will be mitigated, and 2) a discussion of how contaminated media will be handled and disposed during construction activities. Once

approved by the SMCEHS and Community and Economic Development Department, the RMP or equivalent shall be implemented by a qualified environmental professional. The results of the RMP or equivalent shall be submitted to the SMCEHS and the Director of Community and Economic Development or the Director's designee prior to the issuance of any issuance of any discretionary permits (e.g., grading, construction, occupancy, whichever occurs first).

Implementation of MM HAZ-2.2a would require the preparation of a Phase I ESA that identifies all potential subsurface contaminants which could create a significant hazard to the public (i.e., construction workers, future residents, adjacent receptors) or the environment. Implementation of MM HAZ-2.2b and MM HAZ-2.2c would ensure that the lateral and vertical extents of any existing subsurface contamination are defined and remediated to the satisfaction of the SMCEHS, which is the CUPA for San Mateo County (refer to the discussion in Section 4.9.1.1). Accordingly, implementation of the Housing Element as amended by MM HAZ-2.2 would ensure that future residential development at Site 14 would not create a significant hazard to the public or the environment. **(Less than Significant Impact with Mitigation Incorporated)**

Impact HAZ-3: The project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. **(Less than Significant Impact with Mitigation Incorporated)**

A number of the Housing Opportunity Sites are located within a quarter-mile of school facilities. Residential uses do not emit hazardous emissions. As discussed under Impact HAZ-1, hazardous materials used during construction and operation would be transported, used, and disposed of in accordance with the RCRA, U.S. Department of Transportation hazardous materials regulations, Cal/OSHA regulations, and the City's General Plan (refer to Section 4.9.1.1). All diesel fuel stored at the Housing Opportunity Sites would be managed in accordance with Health and Safety Code 25507(a)(1)(A). Further, as discussed under Impact HAZ-2, adherence with federal, state and local regulations and mitigation measures MM HAZ-2.1 and HAZ-2.2 would ensure that future development does not create a significant hazard to the public or the environment. For these reasons, future development under the Housing Element Update would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

Impact HAZ-4: The project would not be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment. **(Less than Significant Impact with Mitigation Incorporated)**

As documented in Section 4.9.1.2, Housing Opportunity Sites 11, 12, 14, 15, and 23 are on the Cortese List. Per the discussion under Impact HAZ-2, redevelopment of these sites would not create a significant hazard to the public or environment with implementation of MM HAZ-2.2 and adherence to TCP Mitigation Measure 8-1. Implementation of the aforementioned mitigation measures would ensure that future development of these sites under the Housing Element Update would not create a significant hazard to the public or environment.

Impact HAZ-5: The project would be located within an airport land use plan. The project would not result in a safety hazard or excessive noise for people residing or working in the project area. **(Less than Significant Impact with Mitigation Incorporated)**

As discussed in Section 2.5.3 City/County Association of Governments of San Mateo County, Section 4.11 Land Use and Planning under Impact LU-2, and Section 4.13 Noise and Vibration under Impact NOI-3, residential uses at all of the Housing Opportunity Sites (with the exception of Sites 14 and 19) are compatible with the noise contours identified in the ALUCP. Residential uses at all of the Housing Opportunity Sites are compatible with the safety compatibility zones identified in the ALUCP. Existing height restrictions of 50 feet (maximum of 90 feet for sites located in the TCP area) for future development on the Housing Opportunity Sites (with the exception of Site 14, which has a height restriction of 126 feet and nine inches AMSL pursuant to Ordinance 1446) would ensure building heights would not exceed critical aeronautical surfaces.

As documented in Section 4.9.1.2, Housing Opportunity Sites 14 and 19 are located within the 70-75 dB CNEL noise contour. As discussed in Section 4.13.2 under Impact NOI-3, the Noise and Vibration Assessment (refer to Appendix B) concluded that reducing interior noise levels to 45 dBA (as required by the California Building Standards Code, San Bruno General Plan, and ALUCP) in future residential development at Sites 14 and 19 is feasible using readily available building techniques. Future residential development at Sites 14 and 19 would be required by General Plan Policy HS-35 to comply with relevant noise insulation standards to achieve an indoor noise level of 45 dB CNEL or less. Although Sites 14 and 19 are located within a 70-75 dB CNEL contour and would require a Local Agency Override of the ALUCP (refer to the discussion in Section 2.5.3), redevelopment of Sites 14 and 19 with residential uses that comply with the 45 dB noise insulation requirements would not result in excessive noise exposure for future residents of Sites 14 and 19.

The critical aeronautical surfaces at Site 14 range between 55 to 90 feet AGL, equivalent to 125 to 145 feet AMSL. Building heights at Site 14 are limited to 126 feet, nine inches AMSL by Ordinance 1446 (refer to Section 4.9.1.1). Because the 2023-2031 Housing Element is a policy document and not a specific development proposal, the airspace compatibility policies of the ALUCP do not directly apply. However, future building heights at the Housing Opportunity Sites (including Site 14) would be required to comply with SFO Policy AP-3, which states that building heights must be the

“lower of (1) the height shown on the SFO critical aeronautical surfaces map (Exhibits IV-17 and IV-18), or (2) the maximum height determined not to be a “hazard to air navigation” by the FAA in an aeronautical study prepared pursuant to the filing of Form 7460-1.” The use of construction equipment (such as building cranes) or the construction of buildings with heights in excess of 55 feet AGL could pose a safety hazard to construction workers and future residents.

Mitigation Measures:

MM HAZ-5.1: Prior to approval, the 2023-2031 Housing Element shall include a policy requiring future development at Housing Opportunity Site 14 to comply with the following measures:

- a. Prior to the issuance of any construction or building permits, the applicant shall submit a plan with a list of equipment to be used during construction that includes their height and proposed area of operation to the Director of Community and Economic Development or the Director’s designee. The use of equipment in locations where it would penetrate critical aeronautical surfaces shall be expressly prohibited by any construction or building permits issued. The plan sets shall include a page depicting the critical aeronautical surfaces on-site, a list of all equipment with heights of 55 feet or greater and their respective heights, and informs construction workers that the use of equipment with heights that would penetrate critical aeronautical surfaces is prohibited.
- b. Future development at Housing Opportunity Site 14 shall comply with Policy AP-3 of the Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport (ALUCP). Buildings with heights in excess of the applicable critical aeronautical surface as shown in Exhibit IV-17 at Housing Opportunity Site 14 shall be prohibited unless the Federal Aviation Administration determines the proposed building height is not a hazard to air navigation in an aeronautical study prepared pursuant to the filing of Form 7460-1. Proof of compliance with Policy AP-3 of the ALUCP shall be provided to the Director of Community and Economic Development or the Director’s designee prior to issuance of any construction or building permits.

MM HAZ-5.1a would ensure that no construction or building permits are issued that would allow the use of construction equipment on Site 14 that could penetrate critical aeronautical surfaces, and that construction workers are informed on where the use of equipment with heights of 55 feet or greater is prohibited. Adherence with MM HAZ-5.1b would ensure no buildings are constructed that exceed critical aeronautical surfaces or would result in a hazard to air navigation according to the FAA. Accordingly, implementation of the Housing Element as amended by MM HAZ-5.1 would ensure that future residential development at Site 14 would not result in a safety hazard for future workers or residents within the project area.

Impact HAZ-6: The project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. **(Less than Significant Impact)**

The City of San Bruno is within the San Mateo County Emergency Operations Plan area. Under the Emergency Operations Plan, cities are responsible for responding to emergencies within their jurisdiction. As discussed in Section 4.15 Public Services under Impact PS-1 and Impact PS-2, future residential development under the Housing Element Update would pay development impact fees that would contribute to funding the construction of new and expanded fire and police facilities to help the City's fire and police departments maintain and/or achieve their respective performance objectives. Further, during an emergency, the City would be able to request additional aid from the San Mateo County Emergency Operation Center, including additional personnel and equipment. Accordingly, future development under the Housing Element Update would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

Impact HAZ-7: The project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. **(Less than Significant Impact)**

As shown on Figure 4.20-1, Site 6 is located within a Wildland Fire Hazard Area, and Sites 3 and 14 are bordered by a Wildland/Urban Interface Area. Adherence with General Plan Policy PFS-30 would require future development at Sites 3, 6, and 14 to install and maintain a variety of fire protection measures, and all construction would be required by the City's Municipal Code to be built to 2019 California and International Fire Code standards with fire suppression systems. Further, as discussed in Section 4.15 under Impact PS-1, fire protection services are adequate to meet new demand generated by redevelopment of Sites 3, 6, and 14. For these reasons, future development under the Housing Element Update would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

4.10 HYDROLOGY AND WATER QUALITY

4.10.1 Environmental Setting

4.10.1.1 *Regulatory Framework*

Federal and State

The federal Clean Water Act and California's Porter-Cologne Water Quality Control Act are the primary laws related to water quality in California. Regulations set forth by the Environmental Protection Agency (EPA) and the State Water Resources Control Board (SWRCB) have been developed to fulfill the requirements of this legislation. EPA regulations include the National Pollutant Discharge Elimination System (NPDES) permit program, which controls sources that discharge pollutants into the waters of the United States (e.g., streams, lakes, bays, etc.). These regulations are implemented at the regional level by the Regional Water Quality Control Boards (RWQCBs). The project site is within the jurisdiction of the San Francisco Bay RWQCB.

Under Section 303(d) of the federal Clean Water Act, the SWRCB and RWQCBs are required to identify impaired surface water bodies that do not meet water quality standards and develop total maximum daily loads (TMDLs) for contaminants of concern. The list of the state's identified impaired surface water bodies, known as the "303(d) list" can be found on the on the RWQCB's website.⁹⁶

National Flood Insurance Program

The Federal Emergency Management Agency (FEMA) established the National Flood Insurance Program (NFIP) to reduce impacts of flooding on private and public properties. The program provides subsidized flood insurance to communities that comply with FEMA regulations protecting development in floodplains. As part of the program, FEMA publishes Flood Insurance Rate Maps (FIRMs) that identify Special Flood Hazard Areas (SFHAs). An SFHA is an area that would be inundated by the one-percent annual chance flood, which is also referred to as the base flood or 100-year flood.

Statewide Construction General Permit

The SWRCB has implemented an NPDES General Construction Permit for the State of California (Construction General Permit). For projects disturbing one acre or more of soil, a Notice of Intent (NOI) must be filed with the RWQCB by the project sponsor, and a Storm Water Pollution Prevention Plan (SWPPP) must be prepared by a qualified professional prior to commencement of construction and filed with the RWQCB by the project sponsor. The Construction General Permit includes requirements for training, inspections, record keeping, and, for projects of certain risk levels, monitoring. The general purpose of the requirements is to minimize the discharge of pollutants and to protect beneficial uses and receiving waters from the adverse effects of construction-related storm water discharges.

⁹⁶ San Francisco Regional Water Quality Control Board. "The 303(d) List of Impaired Water Bodies." Accessed August 11, 2022. https://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/TMDLs/303dlist.html.

Regional and Local

San Francisco Bay Basin Plan

The San Francisco Bay RWQCB regulates water quality in accordance with the Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan). The Basin Plan lists the beneficial uses that the San Francisco Bay RWQCB has identified for local aquifers, streams, marshes, rivers, and the San Francisco Bay, as well as the water quality objectives and criteria that must be met to protect these uses. The San Francisco Bay RWQCB implements the Basin Plan by issuing and enforcing waste discharge requirements, including permits for nonpoint sources such as the urban runoff discharged by a City's stormwater drainage system. The Basin Plan also describes watershed management programs and water quality attainment strategies.

Municipal Regional Permit Provision C.3

The San Francisco Bay RWQCB re-issued the Municipal Regional Stormwater NPDES Permit (MRP) in May 2022 to regulate stormwater discharges from municipalities and local agencies (co-permittees) in Alameda, Contra Costa, San Mateo, and Santa Clara Counties, and the cities of Fairfield, Suisun City, and Vallejo.⁹⁷ Under Provision C.3 of the MRP, new and redevelopment projects that create or replace 5,000 square feet or more of impervious surface area are required to implement site design, source control, and Low Impact Development (LID)-based stormwater treatment controls to treat post-construction stormwater runoff. LID-based treatment controls are intended to maintain or restore the site's natural hydrologic functions, maximizing opportunities for infiltration and evapotranspiration, and using stormwater as a resource (e.g. rainwater harvesting for non-potable uses). The MRP also requires that stormwater treatment measures are properly installed, operated, and maintained.

In addition to water quality controls, the MRP requires new development and redevelopment projects that create or replace one acre or more of impervious surface to manage development-related increases in peak runoff flow, volume, and duration, where such hydromodification is likely to cause increased erosion, silt pollutant generation, or other impacts to local rivers, streams, and creeks. Projects may be deemed exempt from these requirements if: (1) the post-project impervious surface area is less than, or the same as, the pre-project impervious surface area; (2) the project is located in a catchment that drains to a hardened (e.g., continuously lined with concrete) engineered channel or channels or enclosed pipes, which extend continuously to the Bay, Delta, or flow-controlled reservoir, or, in a catchment that drains to channels that are tidally influenced; or (3) the project is located in a catchment or subwatershed that is highly developed (i.e., that is 70 percent or more impervious).⁹⁸

⁹⁷ California Regional Water Quality Control Board San Francisco Region. *Municipal Regional Stormwater NPDES Permit, Order No. R2-2022-0018, NPDES Permit No. CAS612008*. May 11, 2022

⁹⁸ The Hydromodification Applicability Maps developed the permittees under Order No. R2-2009-0074 were prepared using this standard, adjusted to 65 percent imperviousness to account for the presence of vegetation on the photographic references used to determine imperviousness. Thus, the maps for Order No. R2-2009-0074 are accepted as meeting the 70 percent requirement.

Municipal Regional Permit Provision C.12.f

Provision C.12.f of the MRP requires co-permittee agencies to implement a control program for PCBs that reduces PCB loads by a specified amount during the term of the permit, thereby making substantial progress toward achieving the urban runoff PCBs wasteload allocation in the Basin Plan by March 2030.⁹⁹ Programs must include focused implementation of PCB control measures, such as source control, treatment control, and pollution prevention strategies. Municipalities throughout the Bay Area are updating their demolition permit processes to incorporate the management of PCBs in demolition building materials to ensure PCBs are not discharged to storm drains during demolition. Buildings constructed between 1950 and 1980 that are proposed for demolition must be screened for the presence of PCBs prior to the issuance of a demolition permit. Single-family residential and wood frame structures are exempt.

San Mateo Countywide Water Pollution Prevention Program

The San Mateo Countywide Water Pollution Prevention Program (SMCWPPP) was established in 1990 to reduce the pollution carried by stormwater into local creeks, San Francisco Bay, and the Pacific Ocean. The program is a partnership of the C/CAG, each incorporated city and town in the county, and the County of San Mateo, which share a common National Pollutant Discharge Elimination System permit. The SMCWPPP includes pollution reduction activities for construction sites, illegal discharges and illicit connections, new development, and municipal operations. The program also includes a target pollutant reduction strategy and monitoring program.

San Mateo County Flood Control District

The San Mateo County Flood Control District provides financing for flood control projects and manages the larger network of pipes, trenches, culverts, detention basins, and open channels throughout the district. There are three active flood control zones within this district: Colma Creek, San Bruno Creek, and San Francisquito Creek. The Colma and San Bruno zones intersect the City of San Bruno.

City of San Bruno General Plan

Various policies in the City’s General Plan have been adopted for the purpose of avoiding or mitigating impacts on hydrology and water quality resulting from planned development within the City, including the following:

Policies	Description
ERC-A	Preserve open space essential for the conservation of San Bruno’s natural resources – including vegetation, wildlife, soils, water, and air.
ERC-D	Reduce pollution levels within the surface water that San Bruno discharges into the San Mateo County Flood Control District, then into San Francisco Bay.
ERC-3	Protect natural vegetation in park, open space, and scenic areas as wildlife habitat, to prevent erosion, and to serve as noise and scenic buffers.

⁹⁹ California Regional Water Quality Control Board San Francisco Region. *Municipal Regional Stormwater NPDES Permit, Order No. R2-2022-0018, NPDES Permit No. CAS612008*. May 11, 2022

Policies	Description
ERC-4	Encourage the use of Best Management Practices in conserving the city's valuable water supply sources.
ERC-18	Coordinate efforts with the San Mateo County Flood Control District, Caltrans, Golden Gate National Recreation Area, San Francisco Airport, Peninsula Watershed lands, and Junipero Serra County Park to develop or preserve and manage interconnecting wildlife movement corridors.
ERC-19	Regulate new development – specifically industrial uses – as well as construction and demolition practices to minimize pollutant and sediment concentrations in receiving waters and ensure waterbodies within San Bruno and surface water discharged into San Francisco Bay meets or exceeds relevant regulatory water quality standards.
ERC-20	Require implementation of Best Management Practices to reduce accumulation of non-point source pollutants in the drainage system originating from streets, parking lots, residential areas, businesses, and industrial operations.
ERC-23	Regulate new development to minimize stormwater runoff rates and volumes generated by impervious surfaces, and maximize recharge of local groundwater aquifers when feasible. Utilize the recommendations provided in the Bay Area Stormwater Management Agency's Start at the Source Design Guidance Manual for Stormwater Quality Protection.
ERC-24	Require that new development incorporate features into site drainage plans that reduce impermeable surface area and surface runoff volumes. Such features may include: <ul style="list-style-type: none"> • Additional landscaped areas including canopy trees and shrubs; • Reducing building footprint; • Removing curbs and gutters from streets and parking areas where appropriate to allow stormwater sheet flow into vegetated areas; • Permeable paving and parking area design • Stormwater detention basins to facilitate infiltration; and • Building integrated or subsurface water retention facilities to capture rainwater for use in landscape irrigation and other non-potable uses.
HS-D	Protect sites subject to flooding hazards by implementing storm drainage improvements, and by requiring building design and engineering that meets or exceeds known flood risk requirements.
HS-5	Require preparation of a drainage and erosion control plan for land alteration and vegetation removal on sites greater than 10,000 sq. ft. in size.
HS-16	Design and engineer new or redevelopment projects in potential flood hazard areas (e.g., Belle Air Park) to withstand known flood risk.
HS-18	Require developers to implement erosion and sedimentation control measures to maintain an operational drainage system, preserve drainage capacity, and protect water quality.
HS-20	Retain existing open space areas that serve as detention ponds in order to retain stormwater, recharge aquifers, and prevent flooding.
HS-22	Require that construction-related grading and other activities comply with the Association of Bay Area Governments' (ABAG) Manual of Standards for Erosion and Sediment Control Measures and with the California Stormwater Quality Association (CASQA), Stormwater Best Management Practice Handbook for Construction.

City of San Bruno Urban Runoff Management Policies

Policies related to the management of urban runoff within the City are included in Title 10 of the San Bruno Municipal Code, Municipal Services, and Title 12, Land Use. Best Management Practices as defined in Chapter 10.12, Water Quality Controls, which reduce the presence of pollutants in the stormwater are outlined in Chapter 10.18, Storm Water Management and Discharge Control.

- 1) No person shall throw, deposit, leave, maintain, keep, or permit to be thrown, deposited, placed, left or maintained, any refuse, rubbish, garbage, or other discarded or abandoned objects, articles, and accumulations, in or upon any street, alley, sidewalk, storm drain inlet, catch basin, conduit or other drainage structure, business place, or upon any public or private lot of land in the city, so that the same might be or become a pollutant, except in containers or in lawfully established dumping grounds.
- 2) Standard for Parking Lots and Similar Structures. Persons owning or operating a parking lot, gas station pavement or similar structure shall clean those structures as frequently and thoroughly as practicable in a manner that does not result in discharge of pollutants to the city storm sewer system.
- 3) Best Management Practices for New Developments and Redevelopments. Any construction contractor performing work in the city shall endeavor, whenever possible, to provide filter materials at the catch basin to retain any debris and dirt flowing into the city's storm sewer system. City may establish controls on the volume and rate of storm water runoff from new developments and redevelopments as may be appropriate to minimize the discharge and transport of pollutants.
- 4) Compliance with Best Management Practices. Where best management practices guidelines or requirements have been adopted by the city for any activity, operation, or facility which may cause or contribute to storm water pollution or contamination, illicit discharges, and/or discharge of non-storm water to the storm water system, every person undertaking such activity or operation, or owning or operating such facility shall comply with such guidelines or requirements as may be identified by the director of public works. (Ord. 1558 § 1, 1994)

Provisions for the minimization of the adverse effects of water runoff are also included in Title 12 "Land Use", Article I "Excavation and Grading, Chapter 12.12 "Soils and Engineering Geology Report" and 12.16 "Grading Regulations". As an attached element of the grading plan, Subsection 12.12.050 "Erosion Control" requires an erosion control plan containing:

"Calculations showing estimated surface water runoff on the site and maintenance of non-vegetative erosion control measures. Vegetative control measures shall be in accordance with Association of Bay Area Governments Manual for Surface Runoff Control Measures, pages 1-50 through 1-57, inclusive. (Ord. 1369 § 1, 1981; prior code § 9-1.7(f))"

Per Subsection 12.16.030, "Grading progress and inspection", swales or ditches on terraces shall have a minimum gradient of three percent and shall be paved with reinforced concrete not less than three inches in thickness. They shall have a minimum paved width of five feet. A single run of swale or ditch shall not collect runoff from a tributary area exceeding fifteen thousand square feet (projected) without discharging into a down drain. Sediment basins may also be required by the city

engineer to detain runoff and trap sediment during construction until slope erosion planting has been established.

City of San Bruno Storm Drain Master Plan

To identify and address potential flood risks in the City of San Bruno, a Storm Drain Master Plan was adopted by the City in June 2014. In addition to updating the City’s flood control guiding document, the Master Plan defines a new Capital Improvement Program to address the storm drain system’s capacity deficiencies.

Transit Corridors Plan

Various policies in the TCP have been adopted for the purpose of avoiding or mitigating hydrology and water quality impacts resulting from planned development within the TCP area, including the following:

Policies	Description
A13-1	Ensure that all projects comply with the Municipal Regional Stormwater Permit as required by the National Pollutant Discharge Elimination System (NPDES) program.
A13-2	Encourage Low Impact Development (LID) techniques to infiltrate, store, detain, evapotranspire, and/or biotreat stormwater runoff close to its source.
A13-3	Minimize impervious surfaces such as concrete, asphalt and hardscaping, especially for surface parking lots. Utilize permeable joint pavers, porous concrete and asphalt, reinforced grass pavement (turfcrete), cobblestone block
A13-5	Include project features to reduce pollution at its source including covered trash, recycling, and loading facilities.
A13-6	Utilize landscaping that minimizes irrigation and runoff, promotes surface infiltration where possible, minimizes the use of pesticides and fertilizers, and incorporates appropriate sustainable landscaping practices.
A13-7	Ensure adequate tree canopies in the front setbacks of private development and in parking lots, greenways, parks, and plazas to slow and reduce the amount of rainfall that falls to the ground.
A13-8	Encourage the use of green roofs and water collection devices, such as cisterns and rain barrels, to capture water from the building for re-use.
A13-9	Consider incorporating water collection devices, detention areas, and drain spouts into architectural features, water features, or artwork
A13-10	Incorporate any required stormwater treatment measures early in the site planning process to ensure that they will be effective and attractive.
A15-4	Encourage planting strips along the street edges that are designed to act as functional stormwater management systems in the form of “urban bioswales”. Stormwater is directed into the planter strips to irrigate landscaping while filtering and reducing stormwater runoff.

Policies	Description
A6-2	Install naturally drained, landscaped stormwater planters where possible, including on sidewalks, medians, bulbouts, parks and plazas, and traffic circles.
A6-3	Encourage the use of permeable pavers around tree wells instead of impervious materials to increase infiltration of stormwater runoff.

Bayhill Specific Plan

Various policies in the Bayhill Specific Plan have been adopted for the purpose of avoiding or mitigating hydrology and water quality impacts resulting from planned development within the Bayhill Specific Plan area, including the following:

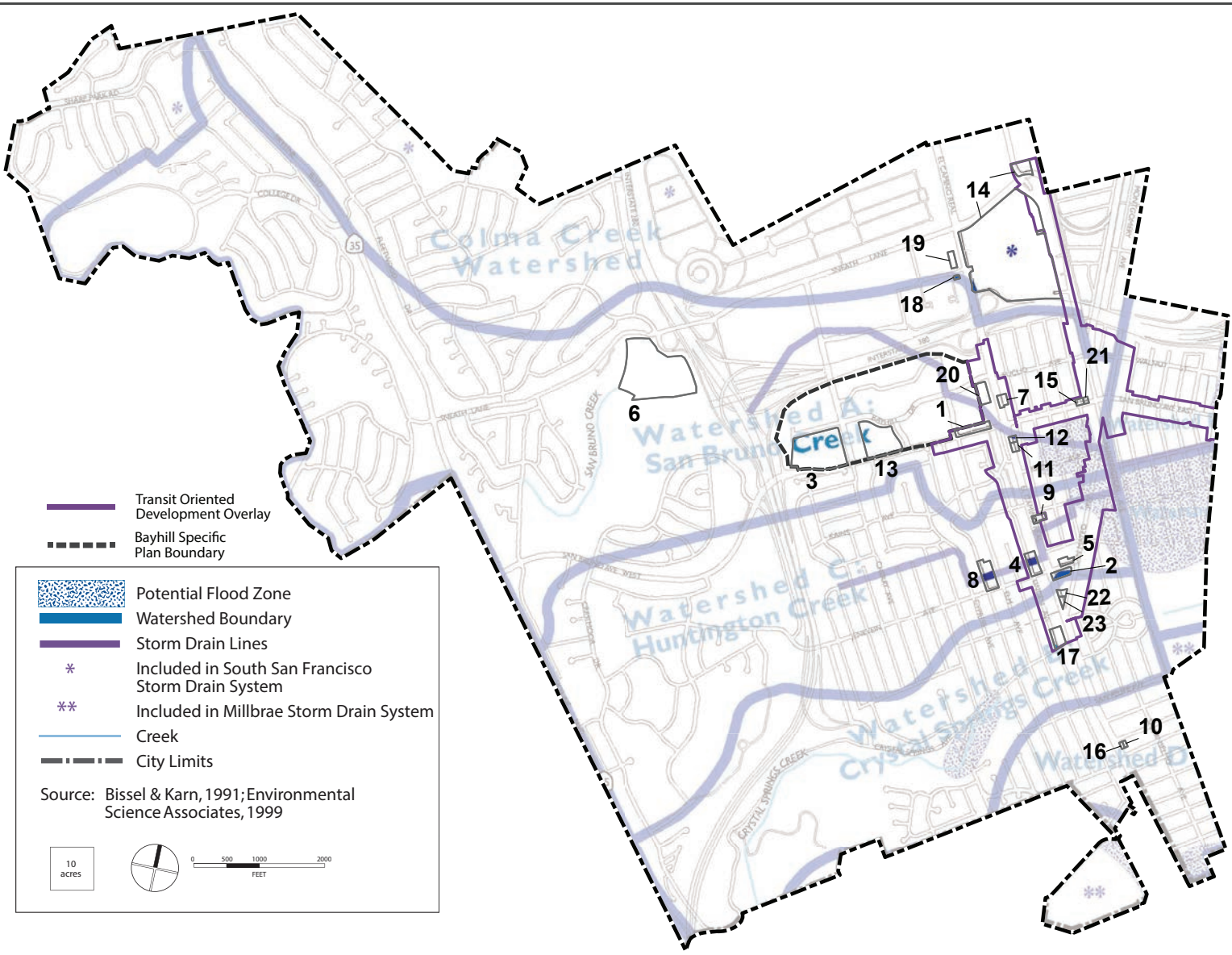
Policies	Description
5-15	Minimize Runoff. <ul style="list-style-type: none"> a. Require new development to demonstrate no net increase in runoff from development, during both construction and operational phases. b. Applicants proposing new development shall prepare Drainage Report(s) for City's review and approval prior to issuance of a grading, building, site development or any construction permits. All development, including interim conditions during construction and interim conditions with temporary improvements, within the Project Site is required to address stormwater management and implement stormwater control measures, including but not limited to on-site detention facilities, capture and re-use measures, green roofs, and/or other measures approved by the City, designed to maintain or reduce current, pre-development, surface runoff and stormwater discharge to the public storm drain system.
5-16	Employ Low-Impact Design. Require new development to incorporate low-impact design (LID), such as natural drainage systems and groundwater recharge features, consistent with stormwater permit requirements and the Green Infrastructure Plan. Utilize LID techniques to infiltrate, store, detain, evapotranspire, and/or bio-treat stormwater runoff close to its source, where feasible.
5-17	Design new private open spaces, plazas, streetscapes, and landscaped areas in the public right-of-way for stormwater management and the efficient use of water.
5-18	Implement trash capture. Require new development to implement trash capture devices on site to reduce trash loads by 100 percent prior to discharging stormwater into the public storm drain system. Require new development to provide trash capture in public stormwater catch basins along the project frontage and any public stormwater catch basins newly installed as part of the development. Cover trash, recycling, and loading areas.
5-19	Utilize sustainable landscaping practices and principles that minimize irrigation and runoff, as well as the use of pesticides and fertilizers
6-8	Protect groundwater supplies from chemical pollution. Developers and property owners shall ensure that any development occurring on parcels where dewatering is needed (anticipated but not limited to parcels 5, 9, 12, 13, 14, or 15, see Figure 2-2) is

Policies	Description
	subject to review and approval by the County of San Mateo's Groundwater Protection Program (see also, Policies 6-19 through 6-25).
6-18	Maintain high levels of water quality within the Westside Basin. Developers shall support the water quality of the Westside Basin by utilizing sustainable landscaping practices that minimize irrigation and runoff, promoting surface infiltration, and minimizing use of pesticides and fertilizers, where possible.
6-19	Require groundwater monitoring well installation and sampling prior to dewatering activity.* For any development proposing excavation and dewatering, project proponents shall install groundwater monitoring wells in the public right-of-way or easement and collect and test samples prior to dewatering activity. Wells are to be drilled as deep as the garage depth being proposed.
6-20	Require project proponents to provide estimates of construction dewatering duration, rates, volumes, methods, radius of impact, and disposal plan as part of project consideration and provide updated evaluations during construction. Require that an independent consultant monitor and confirm validity of the estimates during construction after dewatering efforts are underway and site conditions are better understood at a frequency determined by the City. The project shall be phased such that groundwater extractions do not exceed more than 8.5 percent of total designated max pumping volume allocation for the City of San Bruno from the South Westside Basin (i.e., less than 200 AF per year or less than 1,000 AF over 5 years).
6-24	Ensure that dewatering water quality is monitored and the presence of contaminants such as hydrocarbons and VOCs is ascertained. If petroleum hydrocarbons or VOCs are detected in dewatering water obtain a Fuel and VOC General Permit from the RWQCB prior to discharge of dewatering water to the storm drain.
6-32	Require that all applicants proposing to undertake excavation, drilling, or pile-driving activities for new buildings within the Plan Area retain a qualified paleontologist prior to the start of any ground-disturbing activities.
6-33	Require that all applicants undertaking earth moving projects within the Plan Area adequately respond to the discovery of paleontological resources.

4.10.1.2 *Existing Conditions*

Hydrology and Drainage

San Bruno's Public Works Department Streets and Stormwater Division operates and maintains the storm drainage system in the City. The City's existing storm drain network is shown in Figure 4.10-1. The City of San Bruno contains six watersheds that drain the City. The City's primary drainage basins – San Bruno Creek (Watershed A), Crystal Springs Creek (Watershed B), and Huntington Creek (Watershed C) encompass 80 percent of San Bruno's land area.



FLOODING AND STORM DRAINAGE

FIGURE 4.10-1

Water Quality

San Bruno's storm drain system prevents flooding by channeling stormwater runoff into San Mateo County Flood Control District channels, which then funnel the water to the San Francisco Bay. However, this runoff is not treated, and can deliver pollutants to the Bay from any impermeable surface within the City. Stormwater runoff accounts for up to 80 percent of the pollution entering San Francisco Bay, and can contain the following pollutants: oil, grease, or antifreeze from leaking cars or trucks; paint or paint products; leaves or yard waste; pesticides; herbicides, or fertilizers from yards and gardens; solvents and household chemicals; animal wastes, litter, or sewer leakage; and construction debris such as fresh concrete, mortar, or cement.¹⁰⁰

Groundwater

Prior to 2016, groundwater comprised 50 percent of the City's water supply, but the City's water supply is now predominantly sourced (90 percent) from the San Francisco Public Utilities Commission (SFPUC) and North Coast County Water District (NCCWD) with the remaining supply (10 percent) provided from groundwater from the Westside Groundwater Basin. The surface water supply is supplied from five surface water supply turnouts. The groundwater is extracted from four wells in the central portion of the 40 square mile South Westside Groundwater Basin area. A fifth well is under construction and anticipated to be complete in 2022.¹⁰¹

Between 2019 and 2020, the City of San Bruno supplied 3.12 million gallons per day of water to 11,902 customers, with an average water demand of 69 gallons per resident.¹⁰² The City's 2021 Urban Water Management Plan stated the City has adequate water supplies to support the City's water demands during normal years, but that the City's Water Shortage Contingency Plan would need to be implemented during single- and multiple-dry year scenarios in order to reduce demand to the level of available supplies.¹⁰³

Flooding and Other Hazards

The City of San Bruno has no areas designated by FEMA as 100-year floodplain.¹⁰⁴ A small portion of eastern San Bruno is within the 500-year floodplains; however, none of the Housing Opportunity Sites are within the 500-year floodplain.¹⁰⁵

A tsunami is a large tidal wave caused by an underwater earthquake or volcanic eruption. Tsunamis affecting the Bay Area can result from offshore earthquakes within the Bay Area. Tsunami inundation maps for San Mateo County show that San Bruno is not within a tsunami inundation area.¹⁰⁶

¹⁰⁰ Ibid.

¹⁰¹ City of San Bruno. *Water System Master Plan*. December 2021.

¹⁰² 3,120,000 gallons / 45,257 residents = 68.9 gallons per resident.

¹⁰³ City of San Bruno. *2020 Urban Water Management Plan*. November 2021.

¹⁰⁴ City of San Bruno. *San Bruno General Plan*. Adopted March 24, 2009. Page 7-6.

¹⁰⁵ Federal Emergency Management Agency. "FEMA Flood Map Service Center Search All Products - San Mateo County All Jurisdictions." Accessed September 7, 2022. <https://msc.fema.gov/portal/advanceSearch>.

¹⁰⁶ California Geological Survey. *Tsunami Hazard Area Map*. Accessed July 28, 2022. https://maps.conservation.ca.gov/cgs/informationwarehouse/ts_evacuation/?extent=-13734968.0269%2C4446045.3469%2C-13500153.4761%2C4550305.4535%2C102100&utm_source=cgs+active&utm_content=sanmateo

A seiche is defined as a standing wave generated by rapid displacement of water within an enclosed body of water (such as a reservoir, lake, or bay) due to an earthquake that triggers land movement within the water body or landsliding into or beneath the water body. The nearest enclosed body of water is San Andreas Lake, none of the Housing Opportunity Sites are located in the vicinity of this water body.

4.10.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
1) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
– result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
– substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
– create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
– impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

4.10.2.1 *Approach to Hydrology and Water Quality Analysis*

Hydrology and water quality impacts from future housing development would be limited to the watershed in which the Housing Opportunity site is located. As discussed in Section 4.10.1.2, San Bruno is divided into six watersheds that drain the City. The City's primary drainage basins – San Bruno Creek (Watershed A), Crystal Springs Creek (Watershed B), and Huntington Creek (Watershed C) encompass 80 percent of San Bruno's land area. The cumulative effect of residential development at all of the Housing Opportunity Sites on hydrology and water quality is discussed in Section 4.21, Mandatory Findings of Significance.

Impact HYD-1: The project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. **(Less than Significant Impact)**

The water quality of streams, creeks, ponds, and other surface water bodies can be greatly affected by pollution carried in contaminated surface runoff. Pollutants from unidentified sources, known as non-point source pollutants, are washed from streets, construction sites, parking lots, and other exposed surfaces into storm drains. Urban stormwater runoff often contains contaminants such as oil and grease, plant and animal debris (e.g., leaves, dust, animal feces, etc.), pesticides, litter, and heavy metals. In sufficient concentration, these pollutants have been found to adversely affect the aquatic habitats to which they drain.

Construction Activities

Future construction activities, such as grading and excavation, may result in temporary impacts to surface water quality. When disturbance to underlying soils occurs, the surface runoff that flows across the site may contain sediments that are ultimately discharged into the storm drainage system. Future development of Housing Opportunity Sites that would disturb more than one acre of soil would trigger conformance with the Construction General Permit, which would require an NOI to be submitted to the RWQCB and a SWPPP must be developed to establish methods for controlling discharge associated with construction activities. Future development under the Housing Element Update would also be required to comply with the City's Municipal Code (Chapter 12.16 Grading Regulations) which requires projects to prepare and implement an erosion control plan, thereby ensuring future development complies with local and regional regulations regarding the reduction of pollutants in stormwater. Accordingly, future development under the Housing Element Update in accordance with the Construction General Permit, the City's Municipal Code and General Plan policies would not result in significant construction-related water quality impacts. **(Less than Significant Impact)**

Post-Construction

Future development under the Housing Element Update would be subject to Provision C.3 of the MRP. This requires the incorporation of site design, source control and runoff treatment controls to reduce the rates, volumes and pollutant loads of runoff from the project. Further, future development under the Housing Element Update would also be required to comply the City's Urban Runoff Management Policies, which ensures new developments follow local and regional regulations regarding the reduction of pollutants in stormwater and implement City Best Management Practices

(BMP), such as stormwater filters, to reduce such pollutants. Therefore, the Housing Element Update would have a less than significant impact on post-construction water quality. **(Less than Significant Impact)**

Impact HYD-2: The project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. **(Less than Significant Impact)**

Groundwater levels can fluctuate due to variations in rainfall and other factors. Groundwater from the Westside Groundwater Basin supplies approximately 10 percent of the City's water supply. At this time, specific development details are not known for future development at the Housing Opportunity Sites. In the event that below-grade excavations are expected to encounter groundwater, redevelopment of the site would require dewatering in accordance with the City's Groundwater Discharge Regulations outlined in Section 10.12 of the Municipal Code.

The Housing Element Update would rely on existing sources of water and the city's existing water delivery system (refer to Section 4.19 Utilities and Service Systems for a discussion of the project's water demand as it relates to supplies). The Housing Element Update would not establish new groundwater sources or result in a substantial depletion of aquifers relied upon for local water supplies. For these reasons, the Housing Element Update would not result in a significant groundwater impact.

Impact HYD-3: The project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or impede or redirect flood flows. **(Less than Significant Impact)**

As shown on Figure 4.10-1, there are no watercourses that intersect any of the Housing Opportunity Sites, therefore, the Housing Element Update would not alter the course of any waterways. An aboveground channelized portion of San Bruno Creek transitions belowground at the westernmost border of Site 6; San Bruno Creek remains underground until emptying into the San Bruno Canal, located approximately 1.75 miles east of Site 6.

Future construction at the Housing Opportunity Sites could temporarily alter stormwater drainage patterns. Any erosion associated with future development of the Housing Opportunity Sites would be managed in accordance with the City's Municipal Code (refer to Impact HYD-1). Stormwater runoff would be minimized in accordance with the Construction General Permit and SWPPP. Post-construction, future development under the Housing Element Update would be subject to Provision C.3 of the MRP and the City's Urban Runoff Management Policies, which ensures new

developments follow local and regional regulations regarding the reduction of pollutants in stormwater and implement City BMPs, such as stormwater filters, to reduce such pollutants. With adherence to the City's Municipal Code, Provision C.3 of the MRP, and the Construction General Permit, the rate at which stormwater runoff enters the City's storm drainage system from Housing Opportunity Sites would be reduced, thereby minimizing the risk of potential flood events. The Housing Element Update would, therefore, not substantially alter the drainage pattern of the site or area in a manner which would result in on or offsite erosion, flooding, or runoff impacts.

Impact HYD-4: The project would not risk release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones. **(Less than Significant Impact)**

None of the Housing Opportunity Sites are located in a 100-year floodplain or within a tsunami inundation zone. None of the Housing Opportunity Sites are located near a standing body of water where seiches could occur. Therefore, the Housing Element Update would not risk release of pollutants due to project inundation.

Impact HYD-5: The project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. **(Less than Significant Impact)**

Water Quality Control

As discussed under Impact HYD-1, future development under the Housing Element Update would comply with the City's Post-Construction Urban Runoff Policy 6-29 and Provision C.3 of the RWQCB Municipal Regional NPDES Permit requirements, and would implement the City's standard permit conditions addressing construction- and operational-related surface runoff quality. Thus, the Housing Element Update would not conflict with or obstruct implementation of the San Francisco Bay Basin Plan.

Groundwater Management Plan

All of the Housing Opportunity Sites are located in the Westside subbasin of the San Francisco Bay groundwater basin. The Westside subbasin has not been identified as a medium- or high-priority groundwater basin by the California Department of Water Resources; as such, a Groundwater Sustainability Plan does not need to be prepared for the subbasin per the requirements of the Sustainable Groundwater Management Act. Therefore, the Housing Element Update would not conflict with a sustainable groundwater management plan.

4.11 LAND USE AND PLANNING

4.11.1 Environmental Setting

4.11.1.1 Regulatory Framework

Regional and Local

Plan Bay Area 2050

Plan Bay Area 2050 is a long-range plan for the nine-county San Francisco Bay Area that provides strategies that increase the availability of affordable housing, support a more equitable and efficient economy, improve the transportation network, and enhance the region’s environmental resilience. Plan Bay Area 2050 promotes the development of a variety of housing types and densities within identified Priority Development Areas (PDAs). PDAs are areas generally near existing job centers or frequent transit that are locally identified for housing and job growth.¹⁰⁷

ABAG allocates regional housing needs to each city and county within the San Francisco Bay Area, based on statewide goals. These allocations are designed to lay the foundation for Plan Bay Area 2050’s long-term envisioned growth pattern for the region. ABAG also develops a series of forecasts and models to project the growth of population, housing units, and jobs in the Bay Area. ABAG, MTC, and local jurisdiction planning staff created the Forecasting and Modeling Report, which is a technical overview of the of the growth forecasts and land use models upon which Plan Bay Area 2050 is based.

City of San Bruno General Plan

Various policies in the City’s General Plan have been adopted for the purpose of avoiding or mitigating land use and planning impacts resulting from planned development within the City including the following:

Policies	Description
LUD-4	Strengthen residential integrity in viable neighborhoods within the city’s Redevelopment Area by eliminating incompatible uses and by facilitating upgrading of deteriorated structures.
LUD-16	Promote new housing and mixed-use development within Downtown to provide a larger market base for neighborhood retail shops. Establish pedestrian connections between retail fronting San Mateo Avenue and housing on the back half of blocks.
LUD-40	Promote high-intensity multi-use development along El Camino Real. Limit retail development to those sites north of Crystal Springs Road reinforcing existing retail activity in Downtown and/or The Shops at Tanforan/Towne Center.
LUD-47	Allow high-intensity mixed-use development including retail, offices, services, and housing along San Bruno Avenue, between Elm Avenue and Huntington Avenue.
HS-40	Prohibit new residential development within the 70+ Airport CNEL areas, as dictated by Airport Land Use Commission infill criteria.

¹⁰⁷ Association of Bay Area Governments and Metropolitan Transportation Commission. *Plan Bay Area 2050*. October 21, 2021.

Policies	Description
HS-42	Require new residential development within the 65 dBA CNEL SFO noise contour to submit an aviation easement to the airport. Specific aviation easement requirements shall be consistent with the County of San Mateo Comprehensive Airport-Land Use Compatibility Plan for SFO.
HS-51	Require all new development to comply with FAR Part 77 height restriction standards, in accordance with Airport Land Use Commission guidelines.

Bayhill Specific Plan

Various policies in the Bayhill Specific Plan have been adopted for the purpose of avoiding or mitigating land use impacts resulting from planned development within the Bayhill Specific Plan area, including the following:

Policies	Description
2-2	Allocate New Development According to Land Use Objectives and Site Feasibility. Development is allocated on a parcel-by-parcel basis, per Table 2-2, to support significant increases in Bayhill's regional office and hotel space, and to allow new housing development. Individual parcels are allocated amounts of development according to site conditions and other factors as described in the Specific Plan, consistent with the overall amount of development evaluated by the Bayhill Specific Plan EIR. The maximum FAR of any individual parcel shall be 2.0.
2-8	Allow Housing Development along San Bruno Avenue. The Bayhill Residential Overlay (BR) designation is established to allow for residential uses along San Bruno Avenue on the entire site at 801-851 Traeger Avenue and on 3.95 acres of the 1111 Bayhill Drive site, Parcels 4 and 13 on Figure 2-2. The BR Designation allows for up to 363 dwelling units. As indicated by Table 2-2, a maximum of 205 units are allowed for 801-851 Traeger and a maximum of 158 units are allowed for 1111 Bayhill. When residential square footage is developed on these parcels, the Office Development square footage permitted on these parcels shall be reduced using the conversion factors listed in Table 2-3.
2-9	Create a Residential Frontage along San Bruno Avenue. New residential development along San Bruno Avenue in the Residential Overlay shall be in the form of standalone buildings that are residential-only – separate in terms of siting and program from any on-site office buildings. Residential development shall be oriented to face San Bruno Avenue, as well as Traeger and/or Elm Avenues as appropriate, and feature front porches, stoops, and other features that complement single family residences to the south and create a transition to Bayhill's office development.
2-15	Ensure Flexibility and Resiliency. Buildings and site improvements must be designed to be flexible enough to accommodate potential changes in ownership and changing economic, environmental and social conditions. This includes changes in occupancy, as well as modifications needed to adapt to changes in energy supply and other unforeseen circumstances. Highly-customized or branded building and site designs are discouraged in favor of facilities that can be used by a variety of types of enterprises, and can be modified as needed over time. If the City approves a development project with shared facilities that cross property lines or are shared across adjacent properties, such as above or below grade pedestrian or vehicle connections, the City shall ensure through conditions of approval that

Policies	Description
	these facilities can be modified or removed as needed in the future to accommodate property(s) ownership changes.
2-16	Ensure Self Sufficient Development Phases. Individual phases of development shall be functionally and aesthetically self-sufficient when completed, and allow for efficient occupancy and functioning of remaining Specific Plan Area buildings, parking facilities, and infrastructure.
2-19	Ensure SFPUC-Related Development Review. Project applicants for new development shall submit conceptual design plans for work within or adjacent to SFPUC easements, including construction methods for protecting SFPUC water transmission pipelines, to the SFPUC for review and consent to the extent required under applicable SFPUC authority.
2-20	Ensure Compliance with Comprehensive Airport Land Use Compatibility Plan Policies Related to Building Permits for the Environs of San Francisco International Airport. Prior to building permit issuance, applicants of development projects within the Specific Plan Area that would exceed the FAA notification height, thirty feet in 2021, must either file the applicable Forms with the FAA and provide to the City of San Bruno an FAA determination of no hazard or air navigation finding, or provide evidence that the project is exempt from this requirement. Additionally, all properties that are offered for sale or lease shall comply with all real estate disclosure requirements required by applicable Comprehensive Airport Land Use Compatibility Plan Policy.

Grand Boulevard Initiative

San Bruno is participating in the Grand Boulevard Initiative (GBI), a collaboration of 19 cities, the counties of San Mateo and Santa Clara, local and regional agencies, private business, labor and environmental organizations united to improve the performance, safety and aesthetics of El Camino Real on the Peninsula from Daly City to downtown San Jose.

Participating cities are encouraged to design for neighborhoods that include high quality building designs and diverse land uses, preserve historic buildings and places, and enhance our economic and cultural diversity, with the broad involvement of residents, workers and local businesses. Rail stations and bus facilities are valued not only as vital transportation services, but as public gathering places and assets to spur transit-oriented development. Guiding principles of the GBI include:

1. Targets housing and job growth in strategic areas along the corridor
2. Encourage compact mixed-use development in high quality urban design and construction
3. Create a pedestrian-oriented environment and improve streetscapes, ensuring full access to and between public areas and private developments
4. Develop a balanced multimodal corridor to maintain and improve mobility of people and vehicles along the corridor
5. Manage parking assets
6. Provide vibrant public spaces and gathering places
7. Preserve and accentuate unique and desirable community character and the existing quality of life in adjacent neighborhoods
8. Improve safety and public health
9. Strengthen pedestrian and bicycle connections with the corridor

10. Pursue environmentally sustainable and economically viable development patterns

4.11.1.2 *Existing Conditions*

General Plan and Municipal Code Conforming Sites

Residential development at the densities proposed by the Housing Element Update (refer to Table 3.2-1) are allowed at Housing Opportunity Sites 6, 8, 10, 16, 18, and 19 under their existing General Plan land use designation and zoning designation, and therefore no General Plan amendments or rezoning is required. The existing conditions at these sites related to land use and planning are discussed below.

Housing Opportunity Site 6

Housing Opportunity Site 6 is currently developed with multiple uses, including a privately operated golf driving range, parking lot storage for a private bus operator, and a maintenance building for the San Bruno Park School District. Site 6 has a General Plan land use designation of Low Density Residential and is zoned R-1. The site is bordered by I-280 to the northeast, open space (Crestmoor Canyon) to the south consisting of forest lands and San Bruno Creek, a mix of forest with one-story and two-story residential housing (Quail Point) to the west, and two gas stations located to the north across Sneath Lane.

Housing Opportunity Site 8

Housing Opportunity Site 8 is currently developed with the former Edgemont Elementary School campus. Site 8 has a General Plan land use designation of Low Density Residential and is zoned R-1. Site 8 is located in an urbanized area surrounded on all sides by one-story single-family residential development.

Housing Opportunity Sites 10 and 16

Housing Opportunity Sites 10 and 16 are vacant dirt lots that are located adjacent to each other on San Marco Avenue. Sites 10 and 16 have a General Plan land use designation of Low Density Residential and are zoned R-2. The sites are located in an urbanized area developed with mostly single-family residential development and various commercial uses along the El Camino Real corridor to the immediate west of the sites.

Housing Opportunity Site 18

Housing Opportunity Site 18 is developed with a medical office building. Site 18 has a General Plan land use designation of High-Density Residential and is zone P-D. Commercial uses are present to the north and south along El Camino Real, and multi-family residential developments and the Marine Corps Reserve Center are located west of the project site.

Housing Opportunity Site 19

Housing Opportunity Site 19 is developed with a single-story commercial building and surface parking lot. Site 19 has a General Plan land use designation of Multi-Use Residential Focus and is zoned C-N. The Shops at Tanforan development is located to the east, commercial uses are present to

the north and south along El Camino Real, and multi-family residential developments and the Marine Corps Reserve Center are located to the west.

Transit Corridors Plan Area Sites

As discussed in Section 3.1.1.1, Housing Opportunity Sites 1, 2, 4, 5, 7, 9, 11, 12, 15, 17, 20, 21, 22, and 23 are located within the TCP area. The TCP area is fully urbanized and characterized by diverse land uses, building forms, parcel sizes and surface parking lots. All of the TCP sites have a General Plan Designation of Transit Oriented Development. The site area zoned a mix of TOD-1, TOD-2, and CBD.

Bayhill Specific Plan Area Sites

As discussed in Section 3.1.1.2, Housing Opportunity Sites 3 and 13 are located within the urbanized Bayhill Specific Plan area. The Bayhill Specific Plan area is approximately 92.2 acres in size and encompasses the Bayhill Office Park, Bayhill Shopping Center, and Marriott Courtyard Hotel. Existing uses adjacent to the Bayhill Specific Plan area include low-density residential neighborhoods to the south; small-scale local retail uses, hotels, and single-family residential to the east alongside and beyond El Camino Real; a mix of public parks, high-density residential neighborhoods, and public uses to the north, separated from the Specific Plan area by I-380; and residential uses to the west, separated from the Specific Plan area by I-280.

Housing Opportunity Site 14

Housing Opportunity Site 14 consists of 1122-1188 El Camino Real/300 Tanforan Shopping Center (APNs: 014-316-240; -300; -330; -360), which is developed with the Shops at Tanforan shopping mall, and 1292 Huntington Avenue (APN: 014-311-060), which is located opposite the Shops at Tanforan across the Sneath Lane/Huntington Avenue intersection and is developed with a vacant paved lot. Site 14 has a General Plan land use designation of Regional Commercial and is zoned P-D. Site 14 is located within a heavily urbanized area and is surrounded by single-family residential development to the east and south, multi-family residential and commercial uses and the Marine Corps Reserve Center to the west, and a wide variety of development to the north, including the San Bruno Towne Center retail plaza, hotels, movie theatres, and other commercial and retail uses.

4.11.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
1) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact LU-1: The project would not physically divide an established community. **(Less than Significant Impact)**

A physical division of an established community typically refers to the construction of a physical feature (such as a wall, roadway, or railroad tracks) or the removal of a means of access (such as a local roadway or bridge) that would impair mobility within an existing community or between communities. Implementation of the Housing Element Update would facilitate new residential development in order to meet the City's RHNA allocation. Future residential development under the Housing Element Update would occur primarily on sites either already developed and underutilized, or in close proximity to existing development. As a result, implementation of the Housing Element Update would not divide an established community. As discussed in Section 4.11.1.2, all of the Housing Opportunity Sites are located in developed areas and adjacent to existing residential development and a wide variety of commercial and retail uses. While future development under the Housing Element Update may require improvements to existing roadways and infrastructure, these improvements would likely serve to improve connectivity. In addition, there are several policies in the General Plan that serve to prevent new development from dividing existing uses (refer to Section 4.11.1.1), with adherence to these General Plan policies, implementation of the Housing Element Update would not divide an established community.

Impact LU-2: The project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. **(Less than Significant Impact with Mitigation Incorporated)**

Conflicts of a project with land use policies do not, in and of themselves, constitute significant environmental impacts. Policy conflicts are considered environmental impacts only when the policies themselves were adopted for the purpose of avoiding or mitigating an environmental effect. Such conflicts constitute significant environmental impacts only when the resulting direct environmental effects are significant.

Plan Bay Area 2050

Plan Bay Area 2050 aims to ensure that the Bay Area is affordable, connected, diverse, healthy, and vibrant for all. The Housing Element Update addresses the City's regional housing needs allocation upon which Plan Bay Area 2050 is based; therefore the project directly supports implementation of Plan Bay Area 2050. Additionally, Plan Bay Area 2050 identifies Growth Geographies to guide where future growth in housing and jobs will be focused over the next 30 years. These geographies are identified for growth because of their proximity to transit or access to opportunity. All of the Housing Opportunity Sites (with the exception of Sites 6 and 8) are located within a Priority Development Area.¹⁰⁸ As previously discussed in Section 4.11.1.1, PDAs are areas located near existing job centers and transit. Future development of the Housing Opportunity Sites with residential uses in Priority Development Areas would be consistent with the key objectives of Plan

¹⁰⁸ Metropolitan Transportation Commission. Plan Bay Area 2050 Growth Geographies. Accessed October 11, 2022. <https://mtc.maps.arcgis.com/apps/webappviewer/index.html?id=af347b881594468a94ea85a67e972679>

Bay Area 2050. By locating housing near existing jobs and transit, the project would also promote the reduction of GHG emissions. Therefore, implementation of the Housing Element Update would not conflict with Plan Bay Area 2050. **(Less than Significant Impact)**

San Mateo County Comprehensive Airport Land Use Plan

As discussed in Section 4.9.1.1, the ALUCP outlines the types of land uses that are compatible with the SFO. The determination of consistency of the project with the ALUCP considers issues such as general compatibility, noise, safety, height. Pursuant to State law, when a general plan amendment and/or zoning amendment is proposed within Airport Influence Area (AIA) Area B of an adopted Comprehensive Land Use Plan, a referral must be made to the San Francisco Airport Land Use Commission for a consistency determination. Residential uses are permitted at all of the Housing Opportunity Sites under the ALUCP, with the exception of Sites 14 and 19 due to conflicts with the noise compatibility policies provided therein. The following discussions analyze whether any conflicts with the ALUCP would result in a significant impact on the environment as a result of the Housing Element Update.

Safety

Sites 15 and 21 are located in Safety Compatibility Zone 3, and Site 14 is located in Safety Compatibility Zone 4. The remaining Housing Opportunity Sites are not located in any safety compatibility zones. Pursuant to ALUCP Table IV-2, Safety Compatibility Criteria, residential uses are compatible in Safety Zones 3 and 4. Therefore, the Housing Element is consistent with the ALUCP safety policies.

Noise

As discussed in Section 2.5.3, Housing Opportunity Sites 14 and 19 are located within the 70-75 dB CNEL noise contour and are not zoned for residential use. Residential land uses are considered incompatible with 70-75 dB CNEL noise contour by the ALUCP if they were not zoned for residential use when the current ALUCP went into effect (November 8, 2012).

Future residential development at Sites 14 and 19 would be required by the California Building Standards Code (Title 24), ALUCP (Policy NP-4) and San Bruno General Plan (Policy HS-35) to achieve an interior noise level of 45 dB CNEL or less. For residential structures exposed to aircraft noise above CNEL 60 dB, Title 24, Part 2 of the California Building Standards Code requires an acoustical analysis to demonstrate compliance with this requirement. Although Sites 14 and 19 are located in the 70-75 dB CNEL contour and development of housing on these sites would require a Local Agency Override of the ALUCP (refer to the discussion in Section 2.5.3), the Noise and Vibration Assessment (refer to Appendix B and the discussion under Impact NOI-3 in Section 4.13 of this Initial Study) determined that future residential development at Sites 14 and 19 would be able to achieve a 45 dB CNEL interior as required by Airport Land Use Compatibility Policy NP-4 and General Plan Policy HS-35. Furthermore, Title 24 and General Plan Policy HS-35 would prohibit the issuance of occupancy permits for residential development that would expose future residents to an interior noise level of greater than 45 dB CNEL. Accordingly, the Housing Element Update's inconsistency with the noise compatibility policies provided in the ALUCP would not result in a significant effect on future residents of Sites 14 and 19.

Height Limitations

Existing height restrictions of 50 feet AGL (up to a maximum of 90 feet AGL feet for sites located in the TCP area) for future development on the Housing Opportunity Sites (with the exception of Site 14, which has a height restriction of 126 feet and nine inches AMSL pursuant to Ordinance 1446) would ensure building heights would not exceed critical aeronautical surfaces.

The critical aeronautical surfaces at Site 14 range between 55 to 90 feet AGL, equivalent to 125 to 145 feet AMSL. Building heights at Site 14 are limited to 126 feet, nine inches AMSL by Ordinance 1446 (refer to Section 4.9.1.1). Because the 2023-2031 Housing Element is a policy document and not a specific development proposal, the airspace compatibility policies of the ALUCP do not directly apply. However, future building heights at the Housing Opportunity Sites (including Site 14) would be required to comply with SFO Policy AP-3, which states that building heights must be the “lower of (1) the height shown on the SFO critical aeronautical surfaces map (Exhibits IV-17 and IV-18), or (2) the maximum height determined not to be a “hazard to air navigation” by the FAA in an aeronautical study prepared pursuant to the filing of Form 7460-1.” The use of construction equipment (such as building cranes) or the construction of buildings with heights in excess of 55 feet AGL could pose a safety hazard to construction workers and future residents. With the implementation of mitigation measure MM HAZ-5.1 (refer to discussion under Impact HAZ-5 in Section 4.9 of this Initial Study), construction equipment would not penetrate critical aeronautical surfaces, and no buildings would be constructed that exceed critical aeronautical surfaces or would result in a hazard to air navigation according to the FAA. Accordingly, implementation of the Housing Element as amended by MM HAZ-5.1 would ensure that future residential development at Site 14 would not result in a safety hazard for future workers or residents within the project area.
(Less than Significant Impact with Mitigation Incorporated)

General Plan and Municipal Code

Implementation of the Housing Element Update would facilitate new residential development in order to meet the City’s RHNA allocation. As set forth by state law, the General Plan serves as the primary planning document for the City and all subordinate documents and plans are required to be consistent with the General Plan.

Housing Opportunity Site 14 would require a General Plan Amendment and rezoning in order to complete buildout of the Housing Element Update, as described in Section 3.2.2. At this time, the specific land use designation and zoning district for which a General Plan Amendment and rezoning of Site 14 would be required is not known; as such, this Initial Study analyzes the reasonably foreseeable redevelopment of Site 14 with up to 1,000 residential units. The anticipated future amendment of Site 14’s land use designation and zoning district would be evaluated for potential environmental impacts to confirm whether the General Plan Amendment and rezoning are consistent with the conclusions of this Initial Study/MND or whether supplemental CEQA review would be required.

As discussed and analyzed throughout this Initial Study, future redevelopment of the Housing Opportunity Sites, including Site 14 with up to 1,000 residential units, would not result in a significant environmental impact (with mitigation incorporated) due to a conflict with any land use

plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.
(Less than Significant Impact with Mitigation Incorporated)

Grand Boulevard Initiative

Future development of Sites 1, 2, 4, 5, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23 with residential uses in proximity to the San Bruno Bay Area Rapid Transit (BART) station, Peninsula Corridor Joint Powers Board (Caltrain) station, and El Camino Real would be consistent with the guiding principles of the GBI (refer to Section 4.11.1.1). Accordingly, the Housing Element Update would not result in a significant environmental impact due to a conflict with the GBI. **(Less than Significant Impact)**

4.12 MINERAL RESOURCES

4.12.1 Environmental Setting

4.12.1.1 *Regulatory Framework*

State

Surface Mining and Reclamation Act

The Surface Mining and Reclamation Act (SMARA) was enacted by the California legislature in 1975 to address the need for a continuing supply of mineral resources, and to prevent or minimize the negative impacts of surface mining to public health, property, and the environment. As mandated under SMARA, the State Geologist has designated mineral land classifications in order to help identify and protect mineral resources in areas within the state subject to urban expansion or other irreversible land uses which would preclude mineral extraction. SMARA also allowed the State Mining and Geology Board (SMGB), after receiving classification information from the State Geologist, to designate lands containing mineral deposits of regional or statewide significance.

California Geological Survey

As mandated by SMARA, the CGS has classified lands within the San Francisco-Monterey Bay region into Mineral Resource Zones (MRZs) based on the California State Mining and Geology Board guidelines. Areas with an MRZ-1 designation have sufficient information available indicating that there is little to no likelihood of significant mineral deposits. MRZ-2 areas are those where adequate information indicates that significant deposits are present. Areas classified as MRZ-3 contain mineral deposits, but their significance cannot be evaluated from available data. Areas are classified as MRZ-4 where available information is inadequate for assignment to any other MRZ category.¹⁰⁹

4.12.1.2 *Existing Conditions*

The City of San Bruno west of Highway 101 and east of I-280 is classified as MRZ-1. Upland areas between I-280 and Skyline Boulevard are classified as MRZ-3 for deposits of Merced Formation sand and gravel. All of the Housing Opportunity Sites with the exception of Site 6 are located west of Highway 101 and east of I-280. Site 6 is located between I-280 and Skyline Boulevard. There are no known mineral resources or resource recovery sites present at any of the Housing Opportunity Sites except Site 6, which contains Merced formation sand and gravel.

¹⁰⁹ City of San Bruno. *San Bruno General Plan Draft Environmental Impact Report*. December 2008.

4.12.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
1) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.12.2.1 *Mineral Resources Analysis*

As documented in Section 4.12.1.2, there are no known mineral resources or resource recovery sites present at any of the Housing Opportunity Sites with the exception of Site 6, which is located on Merced Formation sand and gravel. Site 6 has never been used a mineral resource recovery site, nor delineated as a locally important mineral resource recovery site in the General Plan, and is planned for residential uses in the current General Plan, and future residential development at Site 6 would not lead to the loss of locally important sand and gravel present in the site's subsurface. Accordingly, future development under the Housing Element Update would have no impact on mineral resources.

4.13 NOISE AND VIBRATION

The following discussion is based, in part, on a Noise and Vibration Assessment prepared for the Housing Element Update by Illingworth & Rodkin, Inc. A copy of this report, dated September 2022, is attached to this Initial Study as Appendix B.

4.13.1 Environmental Setting

4.13.1.1 *Background Information*

Noise

Factors that influence sound as it is perceived by the human ear, include the actual level of sound, period of exposure, frequencies involved, and fluctuation in the noise level during exposure. Noise is measured on a decibel scale, which serves as an index of loudness. The zero on the decibel scale is based on the lowest sound level that the healthy, unimpaired human ear can detect. Each 10 decibel increase in sound level is perceived as approximately a doubling of loudness. Because the human ear cannot hear all pitches or frequencies, sound levels are frequently adjusted or weighted to correspond to human hearing. This adjusted unit is known as the A-weighted decibel, or dBA.

Since excessive noise levels can adversely affect human activities and human health, federal, state, and local governmental agencies have set forth criteria or planning goals to minimize or avoid these effects. Noise guidelines are generally expressed using one of several noise averaging methods, including L_{eq} , DNL, or CNEL.¹¹⁰ These descriptors are used to measure a location's overall noise exposure, given that there are times when noise levels are higher (e.g., when a jet is taking off from an airport or when a leaf blower is operating) and times when noise levels are lower (e.g., during lulls in traffic flows on freeways or in the middle of the night). L_{max} is the maximum A-weighted noise level during a measurement period.

Vibration

Ground vibration consists of rapidly fluctuating motions or waves with an average motion of zero. Vibration amplitude can be quantified using Peak Particle Velocity (PPV), which is defined as the maximum instantaneous positive or negative peak of the vibration wave. PPV has been routinely used to measure and assess ground-borne construction vibration. Studies have shown that the threshold of perception for average persons is in the range of 0.008 to 0.012 inches/second (in/sec) PPV.

¹¹⁰ L_{eq} is a measurement of average energy level intensity of noise over a given period of time. Day-Night Level (DNL) is a 24-hour average of noise levels, with a 10 dB penalty applied to noise occurring between 10:00 PM and 7:00 AM. Community Noise Equivalent Level (CNEL) includes an additional five dB applied to noise occurring between 7:00 PM and 10:00 PM. Where traffic noise predominates, the CNEL and DNL are typically within two dBA of the peak-hour L_{eq} .

4.13.1.2 *Regulatory Framework*

Federal and State

Federal Transit Administration Vibration Limits

The Federal Transit Administration (FTA) has developed vibration impact assessment criteria for evaluating vibration impacts associated with transit projects. The FTA has proposed vibration impact criteria based on maximum overall levels for a single event. The impact criteria for groundborne vibration are shown in Table 4.13-1 below. These criteria can be applied to development projects in jurisdictions that lack vibration impact standards.

Table 4.13-1: Groundborne Vibration Impact Criteria			
Land Use Category	Groundborne Vibration Impact Levels (VdB inch/sec)		
	Frequent Event	Occasional Events	Infrequent Events
Category 1: Buildings where vibration would interfere with interior operations	65	65	65
Category 2: Residences and buildings where people normally sleep	72	75	80
Category 3: Institutional land uses with primarily daytime use	75	78	83
Source: Federal Transit Administration. <i>Transit Noise and Vibration Assessment Manual</i> . September 2018.			

California Building Standards Code

The CBC establishes uniform minimum noise insulation performance standards to protect persons within new buildings housing people, including hotels, motels, dormitories, apartments, and dwellings other than single-family residences. Title 24 mandates that interior noise levels attributable to exterior sources do not exceed 45 L_{dn}/CNEL in any habitable room. Exterior windows must have a minimum Sound Transmission Class (STC) of 40 or Outdoor-Indoor Transmission Class (OITC) of 30 when the property falls within the 65 dBA DNL noise contour for a freeway or expressway, railroad, or industrial source.

Regional and Local

San Mateo County Comprehensive Airport Land Use Plan

The ALUCP for the Environs of the SFO, prepared by the C/CAG, is a State-mandated land use compatibility plan that addresses the compatibility of surrounding land uses in local jurisdictions with airport operations.

Noise compatibility policies described within the ALUCP are intended to minimize the exposure of residents and occupants of future noise-sensitive development to excessive noise. CNEL noise

contours identify areas where noise exposure is great enough to warrant land use controls to promote noise compatibility. The ALUCP includes forecasted 2015 and 2020 CNEL noise contours. Included in the ALUCP are policies and standards to protect people living in the vicinity of SFO from the effects of aircraft noise. Policy NP-2, Airport/Land Use Compatibility Criteria, establishes criteria to determine the compatibility of proposed land uses in the Airport Noise Compatibility Zones. Residential uses are compatible with noise levels below 65 dB, conditionally compatible with noise levels between 65 and 70 dB, and generally incompatible with noise levels in excess of 70 dB. Residential uses are considered conditionally compatible in areas within the 70-75 dB CNEL noise contour only if the proposed use is on a lot of record zoned for residential use as of the effective date of the ALUCP. Residential uses are considered incompatible in areas within the 70-75 dB CNEL noise contour if they were not zoned for residential use when the ALUCP went into effect or if they are located in a 75 dB CNEL or greater noise contour.

City of San Bruno General Plan

Various policies in the City's General Plan have been adopted for the purpose of avoiding or mitigating noise and vibration impacts resulting from planned development within the City including the following:

Policies	Description
ERC-3	Protect natural vegetation in park, open space, and scenic areas as wildlife habitat, to prevent erosion, and to serve as noise and scenic buffers.
HS-F	Protect the health and comfort of residents by reducing the impact of noise from automotive vehicles, San Francisco International Airport, railroad lines, and stationary sources.
HS-G	Ensure that all development heeds safety precautions from the San Francisco International Airport.
HS-32	Encourage developers to mitigate ambient noise levels adjacent to major noise sources by incorporating acoustical site planning into their projects. Utilize the City's Building Code to implement mitigation measures, such as: <ul style="list-style-type: none"> • Incorporating buffers and/or landscaped berms along high-noise roadways or railways; • Incorporating traffic calming measures and alternative intersection design within and/or adjacent to the project; • Using reduced-noise pavement (rubberized asphalt); and • Incorporating state-of-the-art structural sound attenuation measures.
HS-33	Prevent the placement of new noise sensitive uses unless adequate mitigation is provided. Establish insulation requirements as mitigation measures for all development, per the standards in Table 7-1.
HS-35	Require developers to comply with relevant noise insulation standards contained in Title 24 of the California Code of Regulations (Part 2, Appendix Chapter 12A).
HS-36	Encourage developers of new residential projects to provide noise buffers other than sound walls, such as vegetation, storage areas, or parking, as well as site planning and locating bedrooms away from noise sources.
HS-37	Require that all sponsors of new housing (residential and senior housing units) record a notice of Fair Disclosure, regarding the proximity of the proposed development to San

Policies	Description
	Francisco International Airport and of the potential impacts of aircraft operation, including noise impacts, per Ordinance 1646 and AB 2776.
HS-38	Require developers to mitigate noise exposure to sensitive receptors from construction activities. Mitigation may include a combination of techniques that reduce noise generated at the source, increase the noise insulation at the receptor, or increase the noise attenuation rate as noise travels from the source to the receptor.
HS-39	Pursue mitigation of noise impacts from the San Francisco International Airport to the fullest extent possible. Support and advocate for operational practices, changes to aircraft, new technologies, and physical improvements that would reduce the area in San Bruno impacted by aircraft noise.
HS-40	Prohibit new residential development within the 70+ Airport CNEL areas, as dictated by Airport Land Use Commission infill criteria.
HS-41	Encourage SFO Airport authorities to undertake noise abatement and mitigation programs that are based not only on the airport's noise contour maps, but that consider other factors such as the frequency of over-flights, altitude of aircraft, and hours of operation.
HS-42	Require new residential development within the 65 dBA CNEL SFO noise contour to submit an avigation easement to the airport. Specific avigation easement requirements shall be consistent with the County of San Mateo Comprehensive Airport-Land Use Compatibility Plan for SFO.
HS-42	Require new residential development within the 65 dBA CNEL SFO noise contour to provide an avigation easement to the airport prior to issuing occupancy permits.
HS-43	Allow reasonable latitude for noise generated by uses that are essential to community health, safety, and welfare, such as emergency vehicle operations and sirens.
HS-44	Adopt traffic mitigations – including reduced speed limits, improved paving texture, and traffic signal controls – to reduce noise in areas where residential development may front on high-traffic arterials, such as El Camino Real.
HS-45	Where feasible and appropriate, develop and implement noise reduction measures when undertaking improvements, extensions, or design changes to San Bruno streets.
HS-46	Encourage transit vehicles to develop and apply noise reduction technologies to reduce the noise and vibration impacts of Caltrain, BART and bus traffic.
HS-47	Enforce Vehicle Code noise emission standards, as well as provisions which prohibit alteration of vehicular exhaust systems in ways that increases noise levels.
HS-49	Actively and aggressively participate in forums and discussions regarding operations and expansion plans for San Francisco International Airport. Seek local representation on task forces, commissions, and advisory boards established to guide airport policies and programs.
LUD-31	Develop a green buffer along Huntington Avenue, as illustrated in Figure 2-7 to buffer residents from BART and Caltrain activities.
T-G	Protect residential areas from congestion and associated noise resulting from BART and Caltrain spillover traffic.

City of San Bruno Municipal Code

Regulations pertaining to permitted noise levels and operational hours associated with construction as well as acceptable noise levels from stationary sources are provided in the San Bruno Municipal Code. Relevant portions of the Municipal Code regarding noise and hours of operation include:

- **Title 6 “Public Peace, Morals, and Welfare”, Chapter 6.16 “Noise Regulations”**

Ambient noise levels in residential zones are limited to 45 decibels from 10 p.m. to seven a.m. and 60 decibels from seven a.m. to 10 p.m. Noise levels exceeding the ambient base level by more than 10 decibels is a violation, except during the period seven a.m. to 10 p.m. where the ambient base level may be exceeded by 20 decibels for a period not to exceed 30 minutes during any 24 hour period. Construction noise levels are not permitted to exceed 85 decibels as measured at 100 feet, or exceed between the hours of 10 p.m. and seven a.m. a noise level of 60 decibels as measured at 100 feet without a permit from the Director of Public Works.

- **Title 12 “Land Use”, Article I. “Excavation and Grading”, Chapter 12.16 “Grading Regulations”**

All grading and noise therefrom, including but not limited to, warming of equipment motors in residential zones, or within 1,000 feet of any residential occupancy, hotel, motel, or hospital shall be limited to those hours between seven a.m. and 5:30 p.m. on weekdays, unless other hours are approved by the city engineer based upon evidence that an emergency exists which would constitute a hazard to persons or property if grading at other times is not permitted.

Bayhill Specific Plan

As noted in Section 3.1.1.1, Housing Opportunity Sites 3 and 13 are located within the Bayhill Specific Plan area. Chapters Three and Six of the Bayhill Specific Plan include mandatory “Urban Design” and “Environmental Quality” policies, including the following which pertain to noise and vibration.

Policy 3-13

Policy 3-13 requires projects to design outdoor use areas and public open spaces to reduce their exposure to traffic noise through building orientation and location.

Policy 3-27

Policy 3-27 requires building designs to reduce freeway- and airport-related noise intrusion into interior building spaces through the use of noise insulating walls, windows, and doors, and locating bedrooms and other noise-sensitive rooms away from noise sources.

Policy 6-1

Policy 6-1 requires projects to complete acoustical evaluations and implement necessary noise attenuation design measures to reduce interior noise levels to 45 dBA or less.

Policy 6-3

Policy 6-3 requires the preparation of a nighttime construction noise control plan that demonstrates that noise from construction activities will comply with the City's noise limit of 60 dBA at a distance of 100 feet.

Policy 6-4

Policy 6-4 requires the preparation of a noise analysis prior to the operation of any amplified music, HVAC equipment, emergency generators, loading docks, and mechanical equipment that demonstrates noise levels would not exceed City standards at adjacent land uses or result in a 10 dB or greater increase in ambient noise levels. A noise control plan would be required for any proposed uses that would exceed City standards at adjacent land uses or result in a 10 dB or greater increase in ambient noise levels.

Policy 6-5

Policy 6-5 prohibits amplified sound from resulting in noise levels in excess of 15 dBA at a distance of 100 feet in comparison with ambient noise levels; future development would be required to submit a noise analysis demonstrating compliance with the aforementioned limitations or noise-monitoring and real time adjustments during events with amplified sound.

Policy 6-6

Policy 6-6 limits the testing of emergency generators to the hours of seven a.m. to 10 p.m.

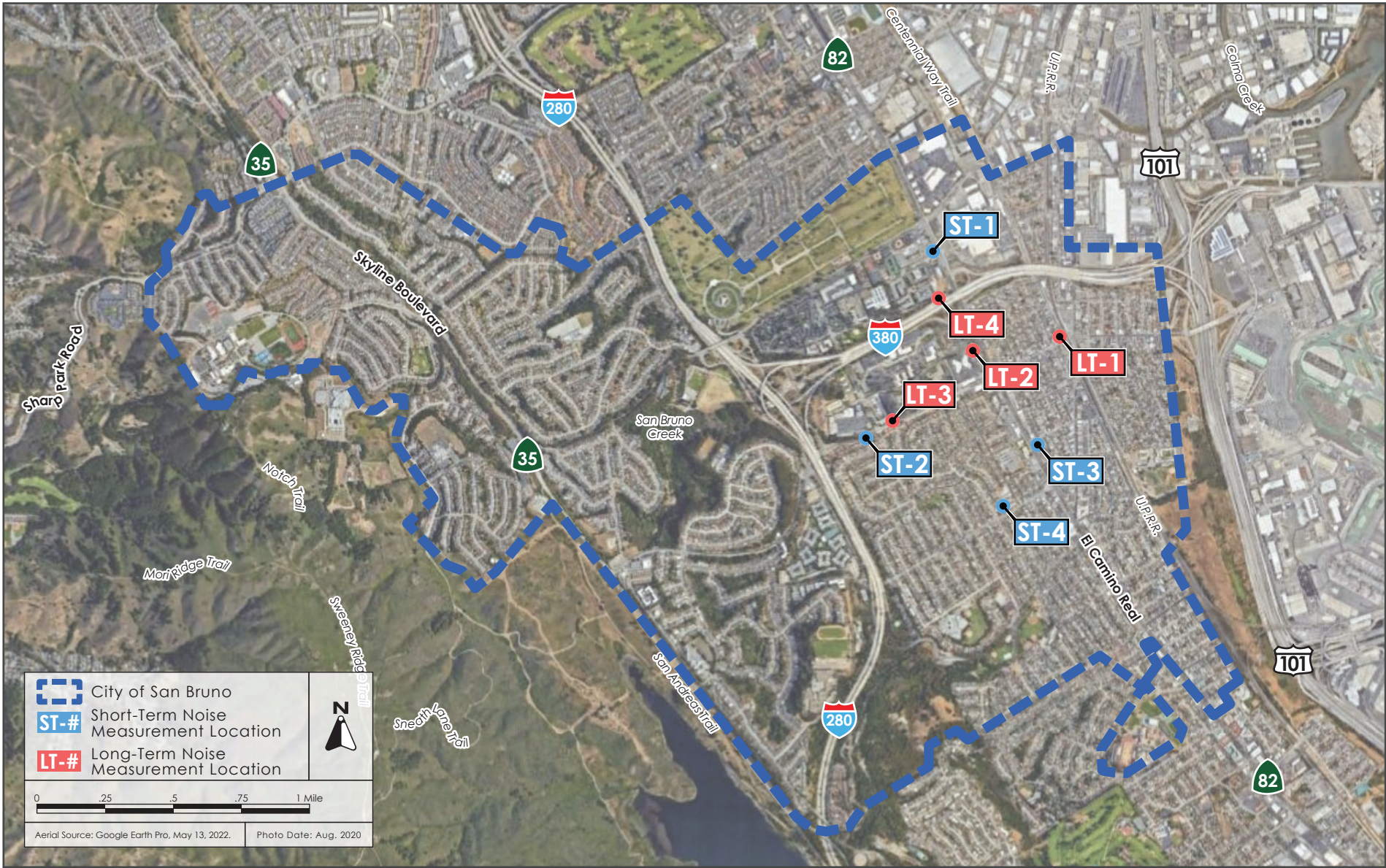
4.13.1.3 *Existing Conditions*

The existing noise environment was quantified through four short-term noise measurements (ST-1 through ST-4) and four long-term measurements (LT-1 through LT-4). The noise measurement locations are shown on Figure 4.13-1, and summarize below.

Long-Term Noise Measurements

Noise measurement LT-1 was at Housing Opportunity Site 21. LT-1 was located about 45 feet west of the Huntington Avenue centerline. Traffic along Huntington Avenue, railroad noise from the Union Pacific railroad tracks, and aircraft noise from SFO were the primary sources of noise in the area. Hourly average noise levels ranged from 65 to 73 dBA Leq during the day and from 57 to 71 dBA Leq at night. The average noise exposure level at this location on Thursday, August 18, 2022 was 73 dBA Ldn.

Noise measurement LT-2 was at Housing Opportunity Site 20. LT-2 was located about 140 feet west of the El Camino Real centerline. Traffic along El Camino Real and aircraft noise from SFO were the primary sources of noise in the area. Hourly average noise levels ranged from 64 to 68 dBA Leq during the day and from 58 to 68 dBA Leq at night. The average noise exposure level at this location on Thursday, August 18, 2022 was 71 dBA Ldn.



NOISE MEASUREMENT LOCATIONS

FIGURE 4.13-1

Noise measurement LT-3 was at Housing Opportunity Site 13. LT-3 was located about 65 feet north of the San Bruno Avenue centerline. Traffic along San Bruno Avenue was the primary source of noise in the area. Hourly average noise levels ranged from 64 to 72 dBA Leq during the day and from 56 to 65 dBA Leq at night. The average noise exposure level at this location on Thursday, August 18, 2022 was 69 dBA Ldn.

Noise measurement LT-4 was made at a location representative of Housing Opportunity Site 14. LT-4 was located about 165 feet north of the I-380 centerline. Traffic along I-380 was the primary source of noise in the area. Hourly average noise levels ranged from 68 to 72 dBA Leq during the day and from 62 to 71 dBA Leq at night. The average noise exposure level at this location on Thursday, August 18, 2022 was 75 dBA Ldn. Figures A10 through A12 in Appendix A show the trend in noise levels throughout the measurement period from August 17, 2022 to August 19, 2022.

Short-Term Noise Measurements

Short-term noise measurement ST-1 was conducted on Wednesday, August 17, 2022, between 11:40 a.m. and 11:50 a.m. to document typical noise levels expected at Housing Opportunity Site 19. This location was approximately 85 feet from the centerline of El Camino Real. El Camino Real traffic typically produced noise levels ranging from 58 to 81 dBA, and a jet flyover produced noise levels up to 82 dBA. The 10-minute Leq measured at ST-1 was 71 dBA.

Short-term noise measurement ST-2 was conducted on Wednesday, August 17, 2022, between 12:30 p.m. and 12:40 p.m. to document typical noise levels expected at Housing Opportunity Site 3. This location was approximately 50 feet from the centerline of San Bruno Avenue. San Bruno Avenue traffic typically produced noise levels ranging from 62 to 80 dBA. The 10-minute Leq measured at ST-2 was 70 dBA.

Short-term noise measurement ST-3 was conducted on Friday, August 19, 2022, between 9:20 a.m. and 9:30 a.m. to document typical noise levels expected at Housing Opportunity Site 9. This location was approximately 65 feet from the centerline of El Camino Real. El Camino Real traffic typically produced noise levels ranging from 57 to 76 dBA, and a jet flyover produced noise levels up to 76 dBA. The 10-minute Leq measured at ST-3 was 69 dBA.

Short-term noise measurement ST-4 was conducted on Friday, August 19, 2022, between 9:40 a.m. and 9:50 a.m. to document typical noise levels expected at Housing Opportunity Site 8. This location was approximately 55 feet from the centerline of Jenevein Avenue. Jenevein Avenue traffic typically produced noise levels ranging from 53 to 68 dBA, and two jets produced noise levels ranging from 53 to 55 dBA. The 10-minute Leq measured at ST-4 was 57 dBA.

4.13.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in:				
1) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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 other agencies. **(Less than Significant Impact)**

Operational Noise

Increases in traffic noise gradually degrade the environment in areas sensitive to noise. According to CEQA, “a substantial increase” is necessary to cause a significant environmental impact. For purposes of this Initial Study, a substantial increase would occur if the noise level increase is 5 dBA L_{dn} or greater, with a future noise level of less than 60 dBA L_{dn} , or the noise level increase is 3 dBA L_{dn} or greater, with a future noise level of 60 dBA L_{dn} or greater.

Vehicular traffic on roadways in the City would increase as development occurs and the City’s population increases. These projected increases in traffic would, over time, increase noise levels throughout the community.

As summarized in Table 4.13-2, traffic noise levels would generally increase by 0 to 1 dBA L_{dn} due to anticipated traffic volumes along major roadways in San Bruno. The traffic noise increases attributable to the implementation of the Housing Element Update would not result in a substantial permanent increase noise levels in the community. **(Less than Significant Impact)**

Table 4.13-2: PM Peak Hour Traffic Volumes and Project Generated Traffic Noise Increases¹							
Roadway	Location	PM Peak Hour Volumes				Project Noise Increase (dBA)	
		Existing	Existing + Project	Background	Background+ Project	Versus Existing	Versus Background
Sneath Lane	W. of I-280 SB Ramp	896	986	1,335	1,425	0.4	0.3
Sneath Lane	E. of I-280 NB Ramp	1,448	1,534	2,486	2,572	0.3	0.1
El Camino Real	N. of I-380 WB Ramp	4,562	4,922	4,676	5,036	0.3	0.3
El Camino Real	S. of I-380 EB Ramp	3,673	3,901	5,028	5,256	0.3	0.2
El Camino Real	N. of Crystal Springs Avenue	3,180	3,349	3,978	4,147	0.2	0.2
El Camino Real	S. of Crystal Springs Avenue	3,382	3,542	4,180	4,340	0.2	0.2
San Bruno Avenue	W. of El Camino Real	1,607	1,899	3,068	3,360	0.7	0.4
San Bruno Avenue	E. of El Camino Real	1,531	1,645	2,052	2,166	0.3	0.2
Huntington Avenue	N. of San Mateo Avenue	1,226	1,232	1,229	1,235	0.0	0.0
San Mateo Avenue	S. of Huntington Avenue	715	721	715	721	0.0	0.0
Crystal Springs Avenue	W. of El Camino Real	802	811	802	811	0.0	0.0
Source: Illingworth & Rodkin, Inc. <i>Housing Element Update Noise and Vibration Assessment</i> . November 2022. Notes: ¹ After completion of the analysis presented in this Initial Study, the number of units assumed at Sites 8 and 21 increased by one unit each, the number of units assumed at Site 22 decreased by one unit, and the number of pipeline units decreased by one unit, resulting in a net increase of one unit and two residents assumed at the Housing Opportunity Sites (2,708 units versus 2,709 units, 7,150 residents versus 7,152 residents) and no increase in the total number of units and residents assumed for the Housing Element Update as a whole (3,618 units and 9,552 residents total). This change would not affect any of the conclusions presented herein this Initial Study.							

Construction Noise

Noise impacts resulting from construction depend on the noise generated by various pieces of construction equipment, the timing and duration of noise-generating activities, the distance between

construction noise sources and noise-sensitive receptors, any shielding provided by intervening structures or terrain, and ambient noise levels. Construction noise impacts primarily result when construction activities occur during noise-sensitive times of the day (early morning, evening, or nighttime hours), when construction occurs in areas immediately adjoining noise-sensitive land uses, or when construction durations last over extended periods of time.

Each construction phase would include a different mix of equipment operating. The highest noise levels are typically generated when impact tools are used (e.g., jackhammers, hoe rams). Site grading and excavation activities would also generate high noise levels, as these phases often require the simultaneous use of multiple pieces of heavy equipment (e.g., dozers, excavators, scrapers, loaders). Pile driving activities are typically during foundation work and would generate loud noise levels. Lower noise levels result from construction activities when less heavy equipment is required to complete the tasks or construction activities move indoors. Typical construction levels at a distance of 50 feet are presented in Table 4.13-3. Most demolition and construction noise falls in the range of 80 to 90 dBA at 50 feet from the source. Construction-generated noise levels drop off/increase at a rate of about six dBA per doubling/halving of the distance between the source and receptor. Shielding by buildings or terrain can provide an additional five to 10 dBA noise reduction at distant receptors.

Table 4.13-3: Typical Ranges of Construction Noise Levels at 50 Feet, L _{eq} (dBA)								
Construction Activity	Domestic Housing		Office Building, Hotel, Hospital, School, Public Works		Industrial Parking Garage, Religious Amusement & Recreations, Store, Service Station		Public Works Roads & Highways, Sewers, and Trenches	
	I	II	I	II	I	II	I	II
Ground Clearing								
Excavation	83	83	84	84	84	83	84	84
Foundations	88	75	89	79	89	71	88	78
Erection	81	65	87	75	84	72	79	78
Finishing	88	72	89	75	89	74	84	84
Source: Illingworth & Rodkin, Inc. <i>Housing Element Update Noise and Vibration Assessment</i> . November 2022.								
Notes:								
I – All pertinent equipment present at site.								
II – Minimum required equipment present at site.								

For purposes of this Initial Study, a significant temporary noise impact would be identified if construction noise levels would exceed the noise limits specified in the San Bruno Municipal Code. Pursuant to San Bruno Municipal Code Section 6.16.070, noise from construction activities within any residential zone, or within 500 feet of any residential zone, is limited to 85 dBA, as measured at 100 feet from the source between the hours of 7:00 a.m. and 10:00 p.m., unless a permit has been

obtained to exceed this level. Between the hours of 10:00 p.m. and 7:00 a.m., construction noise is limited to 60 dBA at 100 feet from the source, unless a permit is obtained.

The exact construction activities and associated equipment that would be used throughout buildout of the Housing Element Update are not known at this time. For purposes of analyzing a representative scenario, the construction equipment and phasing information of an example 90-unit multi-family project was used to calculate construction noise levels on an hourly basis (Hourly L_{eq}).¹¹¹ The construction noise levels would represent the majority of residential construction projects anticipated under the Housing Element Update, although the duration of construction would vary depending on the size of the development. The Federal Highway Administration's Roadway Construction Noise Model (RCNM) was used to calculate the hourly average noise levels for each phase of construction, assuming the two loudest pieces of equipment would operate simultaneously, as recommend by the FTA for construction noise evaluations. Table 4.13-4 below summarizes representative construction noise levels for a typical residential development.

Table 4.13-4: Representative Construction Noise Levels¹						
Phase	Construction Equipment (Quantity)	Calculated Hourly Average L_{eq} and L_{dn} (dBA) From Operation of Two Loudest Pieces of Construction Equipment				
		Noise Level at 50 feet	Noise Level at 100 feet	Noise Level at 200 feet	Noise Level at 400 feet	Noise Level at 500 feet
Demolition	Concrete/Industrial Saw (1)* Excavator (2) Rubber-Tired Dozer (1) Tractor/Loader/Backhoe (2)*	85	79	73	67	65
Site Preparation	Grader (2)* Rubber-Tired Dozer (2) Tractor/Loader/Backhoe (2)	84	78	72	66	64
Grading/Excavation	Excavator (4) Grader (2) Rubber Tired Dozer (1) Concrete/Industrial Saw (2)* Tractor/Loader/Backhoe (2)	86	80	74	68	66
Trenching/Foundation	Excavator (2)* Tractor/Loader/Backhoe (2)*	82	76	70	64	62
Building Exterior	Crane (3) Forklift (2) Generator Set (1)* Tractor/Loader/Backhoe (2)*	82	76	70	64	62

¹¹¹ The noise assessment assumes that the 90-unit multi-family project would be constructed over a 20-month period. While some of the Housing Opportunity sites could yield more than 90 units, the amount of equipment on any given site would be representative.

Table 4.13-4: Representative Construction Noise Levels¹						
Phase	Construction Equipment (Quantity)	Calculated Hourly Average Leq and Ldn (dBA) From Operation of Two Loudest Pieces of Construction Equipment				
		Noise Level at 50 feet	Noise Level at 100 feet	Noise Level at 200 feet	Noise Level at 400 feet	Noise Level at 500 feet
	Welders (2)					
Building Interior/ Architectural Coating	Aerial Lift (2) Air Compressor (10)*	77	71	65	59	57
Paving	Cement and Mortar Mixer (4) Paver (4) Paving Equipment (4) Roller (4) Tractor/Loader/Backhoe (4)*	83	77	71	65	63
Source: Illingworth & Rodkin, Inc. <i>Housing Element Update Noise and Vibration Assessment</i> . November 2022. Notes: ¹ After completion of the analysis presented in this Initial Study, the number of units assumed at Sites 8 and 21 increased by one unit each, the number of units assumed at Site 22 decreased by one unit, and the number of pipeline units decreased by one unit, resulting in a net increase of one unit and two residents assumed at the Housing Opportunity Sites (2,708 units versus 2,709 units, 7,150 residents versus 7,152 residents) and no increase in the total number of units and residents assumed for the Housing Element Update as a whole (3,618 units and 9,552 residents total). This change would not affect any of the conclusions presented herein this Initial Study.						

As shown in Table 4.13-4, representative construction noise levels are expected to range from 71 to 80 dBA Leq at 100 feet from the noise source. These levels are below the City's daytime construction noise standard of 85 dBA at a distance of 100 feet. Construction noise impacts would be further reduced through compliance with the construction hours and noise levels specified in the City's Municipal Code and General Plan Policy HS-38, which requires that developers mitigate noise exposure to sensitive receptors from construction activities. The Noise and Vibration Assessment (refer to Appendix B) identified the following best management practices for reducing construction noise to ensure that future development at the Housing Opportunity Sites complies with General Plan Policy HS-38.

Best Management Practices:

- Construction equipment shall be well-maintained and used judiciously to be as quiet as practical;
- Equip all internal combustion engine-driven equipment with mufflers, which are in good condition and appropriate for the equipment;
- Utilize "quiet" models of air compressors and other stationary noise sources where technology exists;
- Locate all stationary noise-generating equipment, such as air compressors and portable power generators, away from noise-sensitive receptors;

- Locate staging areas and construction material areas away from noise-sensitive receptors;
- Prohibit all unnecessary idling of internal combustion engines;
- Consider temporary noise barriers during construction phases involving earth moving equipment (e.g., grading operations) where they would be effective in reducing the construction noise impact, when directly adjoining sensitive receptors. An eight-foot plywood noise barrier could reduce noise levels by at least 5 dBA.
- Designate a “disturbance coordinator” who would be responsible for responding to any local complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and will require that reasonable measures warranted to correct the problem be implemented. Conspicuously post a telephone number for the disturbance coordinator at the construction site and include it in the notice sent to neighbors regarding the construction schedule.

Implementation of the best management practices outlined above as required by General Plan Policy HS-38 would ensure that developers mitigate noise exposure to sensitive receptors by reducing construction noise levels emanating from the site and minimizing disruption and annoyance.

Additionally, construction noise associated with buildout of the Housing Opportunity Sites within the TCP and Bayhill Specific Plan areas would be further reduced with adherence to the mitigation measures identified below.

- **TCP EIR Mitigation 11-1:** All proposed new multifamily residential, transient lodging or other noise-sensitive uses within the Transit Corridors Area shall submit for City approval a noise study, consistent with the requirements of the California Building Code, to identify noise reduction measures necessary to achieve compatibility with City General Plan-identified land use/noise compatibility standards and State Title 24 noise compatibility standards. The noise study shall be approved by the City’s Building Division prior to issuance of a building permit. Identified noise reduction measures, in order of preference so that windows can be opened, may include:
 - Site and building design so as to minimize noise in shared residential outdoor activity areas by locating such areas behind the buildings, in courtyards, or orienting the terraces toward the interior of lots rather than streets;
 - Site and building design so as to minimize noise in the most intensively occupied and noise-sensitive interior spaces of units, such as bedrooms, by placing such interior spaces and their windows and other openings in locations with less noise exposure;
 - Design of windows, doors, and other sound transmission paths such as ventilation openings, walls, and roofs to achieve a high Sound Transmission Class (STC) rating and/or other noise-attenuating characteristics.
 - Installation of forced air mechanical ventilation systems in all units exposed to noise levels exceeding Title 24 standards to allow residents the option of reducing noise by keeping the windows closed.
- **TCP EIR Mitigation 11-2:** Prior to any discretionary City approval of new habitable buildings within 100 feet of the centerline of the Caltrain tracks, completion of a detailed

site-specific vibration study shall be required demonstrating to City satisfaction that groundborne vibrations associated with rail operations either (1) would not exceed applicable FTA groundborne vibration impact assessment criteria, or (2) can be reduced to below the applicable FTA criteria thresholds through building design and construction measures (e.g., stiffened floors, modified foundations).

- **TCP EIR Mitigation 11-3.** Reduce ground-borne vibration levels during individual, site-specific project demolition and construction periods by requiring applicant incorporation of conditions in individual discretionary project demolition and construction contractor agreements within the Transit Corridors Area that stipulate the following ground-borne vibration abatement measures:
 - Restrict vibration-generating activity to between the hours of 7:00 a.m. and 5:00 p.m., Monday through Friday. Prohibit such activity on weekends and holidays.
 - Notify occupants of land uses located within 200 feet of proposed pile-driving activities of the project construction schedule in writing.
 - Investigate in consultation with City staff possible pre-drilling of pile holes as a means of minimizing the number of percussions required to seat the pile.
 - Conduct a pre-construction site survey documenting the condition of any historic structure located within 200 feet of proposed pile driving activities.
 - Monitor pile driving vibration levels to ensure that vibration does not exceed appropriate thresholds for the potentially affected building (5mm/sec or 0.2 inches/sec ppv for structurally sound buildings).
- **TCP EIR Mitigation 11-4.** Reduce demolition and construction noise impacts on adjacent uses by requiring applicant incorporation of conditions in individual discretionary project demolition and construction contract agreements within the Transit Corridors Area that stipulate the following conventional construction-period noise abatement measures:
 - Construction Plan. Prepare a detailed construction plan identifying the schedule for major noise-generating construction activities. The construction plan shall identify a procedure for coordination with nearby noise-sensitive facilities so that construction activities and the event schedule can be scheduled to minimize noise disturbance. The plan shall stipulate the measures that result in compliance with the noise ordinance.
 - Construction Scheduling. Ensure that noise-generating construction activity is limited to between the hours of 7:00 AM to 8:00 PM.
 - Construction Equipment Mufflers and Maintenance. Equip all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment.
 - Equipment Locations. Locate stationary noise-generating equipment as far as possible from sensitive receptors when sensitive receptors adjoin or are near a construction project site.
 - Construction Traffic. Route all construction traffic to and from the construction sites via designated truck routes where possible. Prohibit construction-related heavy truck traffic in residential areas where feasible.

- Quiet Equipment Selection. Use quiet construction equipment, particularly air compressors, wherever possible.
 - Temporary Barriers. Construct solid plywood fences around construction sites adjacent to residences, operational businesses, or noise-sensitive land uses.
 - Temporary Noise Blankets. Temporary noise control blanket barriers should be erected, if necessary, along building facades of construction sites. This mitigation would only be necessary if conflicts occurred which were irresolvable by proper scheduling. (Noise control blanket barriers can be rented and quickly erected.)
 - Noise Disturbance Coordinator. For larger construction projects, the City may choose to require project designation of a “Noise Disturbance Coordinator” who would be responsible for responding to any local complaints about construction noise. The Disturbance Coordinator would determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and institute reasonable measures to correct the problem. Conspicuously post a telephone number for the Disturbance Coordinator at the construction site and include it in the notice sent to neighbors regarding the construction schedule. (The project sponsor should be responsible for designating a Noise Disturbance Coordinator, posting the phone number, and providing construction schedule notices. The Noise Disturbance Coordinator would work directly with an assigned City staff member.)
- **Bayhill Specific Plan EIR Mitigation Measure NOI-1: Construction Noise Control Plan for Nighttime Construction.** Should construction be planned for the nighttime hours of 10:00 p.m. to 7:00 a.m. for any development under the Specific Plan within 500 feet of a residential land use (including the Phase I Development), the contractor(s) for each construction phase shall develop a construction noise control plan that demonstrates that noise from nighttime construction activities will comply with the City noise limit of 60 dBA at a distance of 100 feet, unless a permit is issued and approval is granted by the director of the City Public Works Department or his/her designee. Measures to help reduce noise from construction activity during nighttime hours to this level (or to the extent feasible) shall be incorporated into this plan and may include, but are not limited to, the following:
 - Require stationary noise sources associated with construction (e.g., generators and compressors) in proximity to noise-sensitive land uses to be muffled and/or enclosed within temporary enclosures and shielded by barriers, which can reduce construction noise by as much as 5 dB.
 - Require all construction equipment powered by gasoline or diesel engines and used during nighttime hours to have sound control devices that are at least as effective as those originally provided by the manufacturer and operated and maintained to minimize noise generation.
 - Prohibit idling of inactive construction equipment for prolonged periods during nighttime hours (i.e., more than 2 minutes).
 - Locate construction equipment as far as feasible from adjacent or nearby noise-sensitive receptors.
 - Use noise-reducing enclosures around noise-generating equipment during nighttime hours.
 - Prohibit the use of impact tools (e.g., jack hammers) during nighttime hours.
 - Use electric motors rather than gasoline- or diesel-powered engines to avoid noise associated with compressed air exhaust from pneumatically powered tools during

nighttime hours. Where the use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust could be used; this muffler can lower noise levels from the exhaust by about 10 dB. External jackets on the tools themselves could be used, which could achieve a reduction of 5 dB.

- Ensure that equipment and trucks used for Project construction use the best available noise control techniques (e.g., improved mufflers, equipment redesign, intake silencers, ducts, engine enclosures, acoustically attenuating shields or shrouds).
- For construction work that occurs at night, an alternative to high pitched, single-tone back up alarms shall be used. This could include a visual observer to provide warnings to the driver in the event that workers are present behind the vehicle or the use of a white noise alarm sound source.
- Any alternative approach must comply with all applicable safety regulations.
- The City of San Bruno shall require a third-party inspector to be onsite during all nighttime construction work. The director of the City Public Works Department or his/her designee, based on the degree of construction, proximity to sensitive uses, or a noise complaint, may require the
- Project sponsor to monitor noise levels during nighttime construction activities. If this is required, a plan for noise monitoring and reporting must be provided to the Director of the City Public Works Department or his/her designee for review.
- Should a reduction in construction noise to below the allowable 60 dBA level be deemed infeasible, the contractor shall coordinate with the Community and Economic Development
- Department to obtain a permit that allows the generation of nighttime construction noise in excess of 60 dBA. The permit shall include stipulations and restrictions with which the contractor(s) would be required to comply. The contractor(s) shall comply with all stipulations of the permit. One of the conditions of the permit shall be that interior noise levels at the nearest noise-sensitive uses resulting from nighttime construction shall not exceed 45 dBA, a commonly accepted threshold for sleep disturbance.

Since construction noise is expected to be below the applicable City limits during daytime hours, and construction activities would not be expected at night, daytime construction noise from the Housing Element Update would not result in a substantial temporary increase in noise levels that would be in excess of applicable local standards, resulting in a less-than-significant impact. **(Less than Significant Impact)**

Impact NOI-2: The project would not result in generation of excessive groundborne vibration or groundborne noise levels. **(Less than Significant Impact with Mitigation Incorporated)**

Construction Vibration

Construction equipment such as pile drivers are known to generate substantial vibration levels that if used in the vicinity of sensitive land uses may expose persons to excessive vibration levels as well as have the potential to damage buildings. Other construction equipment such as bulldozers and vibratory rollers do not create the vibration levels of pile drivers; however, these types of equipment are more likely to operate continuously and closer to sensitive receptors, and they may expose persons to excessive vibration levels. Foundation construction techniques involving impact or vibratory pile driving equipment, which can cause excessive vibration, are not expected with the future development under the Housing Element Update. The severity of the vibration impact is determined by the proximity of the project with respect to buildings and receptors. The sensitivity of buildings is also an important factor in evaluating impacts due to groundborne vibration.

The California Department of Transportation recommends a vibration limit of 0.5 in/sec PPV to avoid damage to buildings that are structurally sound and designed to modern engineering standards, a vibration limit of 0.3 in/sec PPV for buildings that are found to be structurally sound but where structural damage is a major concern, and a vibration limit of 0.25 in/sec PPV for historic and some old buildings.

Construction details on each individual project are not currently known and, therefore, cannot be quantified.

Table 4.13-5 presents typical vibration levels that could be expected from construction equipment at a distances of 25 feet to 100 feet. Vibration levels would be higher at distances less than 25 feet and lower at distances greater than 100 feet. Vibration levels would also vary depending on soil conditions, construction methods, and equipment used. Vibration levels are highest close to the source, and then attenuate with increasing distance at the rate $(D_{ref}/D)^{1.1}$, where D is the distance from the source in feet and D_{ref} is the reference distance of 25 feet.

Table 4.13-5: Vibration Source Levels for Construction Equipment				
Equipment		PPV at 25 ft. (in/sec)	PPV at 50 ft. (in/sec)	PPV at 100 ft. (in/sec)
Clam shovel drop		0.202	0.094	0.044
Hydromill (slurry wall)	in soil	0.008	0.004	0.002
	in rock	0.017	0.008	0.004
Vibratory Roller		0.210	0.098	0.046

Table 4.13-5: Vibration Source Levels for Construction Equipment			
Equipment	PPV at 25 ft. (in/sec)	PPV at 50 ft. (in/sec)	PPV at 100 ft. (in/sec)
Hoe Ram	0.089	0.042	0.019
Large bulldozer	0.089	0.042	0.019
Caisson drilling	0.089	0.042	0.019
Loaded trucks	0.076	0.035	0.017
Jackhammer	0.035	0.016	0.008
Small bulldozer	0.003	0.001	0.001
Source: Illingworth & Rodkin, Inc. <i>Housing Element Update Noise and Vibration Assessment</i> . November 2022.			

Table 4.13-6 summarizes the minimum safe setback distances to maintain in order to achieve the 0.25 in/sec PPV threshold for historical buildings and the 0.3 in/sec and 0.5 in/sec PPV thresholds for modern buildings.

Table 4.13-6: Vibration Source Levels for Construction Equipment and Minimum Safe Setbacks				
Equipment		Minimum Safe Setback (feet) 0.25 in/sec PPV	Minimum Safe Setback (feet) 0.30 in/sec PPV	Minimum Safe Setback (feet) 0.50 in/sec PPV
Clam shovel drop		21	18	11
Hydromill (slurry wall)	in soil	<1	<1	<1
	in rock	3	2	2
Vibratory Roller		22	19	12
Hoe Ram		10	9	6
Large bulldozer		10	9	6
Caisson drilling		10	9	6
Loaded trucks		9	8	5
Jackhammer		5	4	3

Small bulldozer	<1	<1	<1
Source: Illingworth & Rodkin, Inc. <i>Housing Element Update Noise and Vibration Assessment</i> . November 2022.			

Construction details on each individual development are not currently known and, therefore, cannot be quantified. It is conservatively assumed that the construction areas associated with these future developments could be located within the minimum safe setback distances identified in Table 4.13-6. In the event that future housing development projects produce vibration levels exceeding the thresholds, construction vibration would be expected to cause both human annoyance and the possibility of cosmetic damage, resulting in a significant impact. Therefore, in order to determine whether future construction could result in significant groundborne vibration impacts, groundborne vibration studies would need to be prepared for each individual project completed under the Housing Element Update.

Mitigation Measures:

MM NOI-2.1: Prior to approval, the 2023-2031 Housing Element shall include a policy requiring future development at all Housing Opportunity Sites to implement the following measures during demolition and construction:

- Groundborne vibration studies shall be prepared by qualified professionals in accordance with industry-accepted methodology where heavy construction activities involving significant site grading, underground, or foundation work will occur within 25 feet of residential or other vibration sensitive uses. The industry-accepted methodologies include the recommended vibration assessment procedure and thresholds provided by public agencies such as Caltrans or the Federal Highway Administration. The studies should identify necessary construction vibration controls to reduce both human annoyance and the possibility of cosmetic damage. Controls shall include, but not be limited to, the following measures:
 - A list of all heavy construction equipment to be used for this project known to produce high vibration levels (tracked vehicles, vibratory compaction, jackhammers, hoe rams, etc.) shall be submitted to the City by the contractor. This list shall be used to identify equipment and activities that would potentially generate substantial vibration and to define the level of effort for reducing vibration levels below the thresholds.
 - Place operating equipment on the construction site as far as possible from vibration-sensitive receptors.
 - Use smaller equipment to minimize vibration levels below the limits.
 - Avoid using vibratory rollers and tampers near sensitive areas.
 - Select demolition methods not involving impact tools.

- Modify/design or identify alternative construction methods to reduce vibration levels below the limits.
- Avoid dropping heavy objects or materials.

With the implementation of mitigation measure MM NOI-2.1, future development under the Housing Element Update would be required to groundborne vibration studies and identify necessary construction vibration controls to reduce both human annoyance and the possibility of cosmetic damage. Additionally, vibration generated during construction at the TCP area sites would be further reduced with adherence to the mitigation measures identified in the TCP EIR, shown below.

- **TCP EIR Mitigation 11-3.** Reduce ground-borne vibration levels during individual, site-specific project demolition and construction periods by requiring applicant incorporation of conditions in individual discretionary project demolition and construction contractor agreements within the Transit Corridors Area that stipulate the following ground-borne vibration abatement measures:
 - Restrict vibration-generating activity to between the hours of 7:00 a.m. and 5:00 p.m., Monday through Friday. Prohibit such activity on weekends and holidays.
 - Notify occupants of land uses located within 200 feet of proposed pile-driving activities of the project construction schedule in writing.
 - Investigate in consultation with City staff possible pre-drilling of pile holes as a means of minimizing the number of percussions required to seat the pile.
 - Conduct a pre-construction site survey documenting the condition of any historic structure located within 200 feet of proposed pile driving activities.
 - Monitor pile driving vibration levels to ensure that vibration does not exceed appropriate thresholds for the potentially affected building (5mm/sec or 0.2 inches/sec ppv for structurally sound buildings).

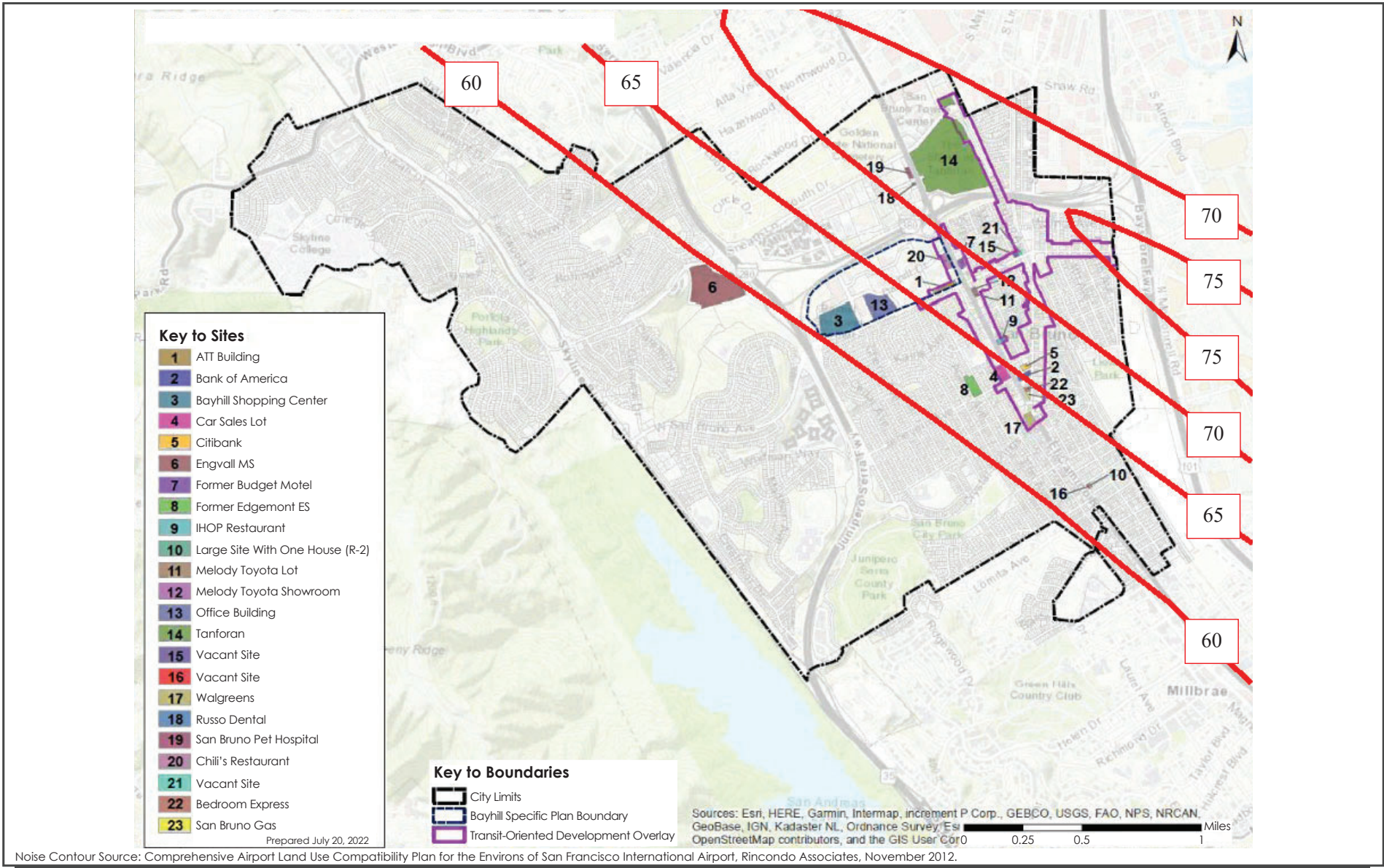
For these reasons, the project would not result in generation of excessive groundborne vibration or groundborne noise levels. **(Less than Significant Impact with Mitigation Incorporated)**

Impact NOI-3: The project would not expose people residing or working in the project area to excessive noise levels. **(Less than Significant Impact)**

All of the Housing Opportunity Sites are located within AIA Area B of SFO and the associated ALUCP. As discussed in Section 4.13.1.1, residential land uses are considered conditionally compatible with noise levels between 65 and 70 dB CNEL, and generally incompatible with noise levels in excess of 70 dB CNEL. As shown on Figure 4.13-2, Housing Opportunity Sites 14, 15, 18, 19, and 21 would be located within the 70-75 dB CNEL noise contour; the remaining sites are located outside of the boundary of the 70 dB CNEL noise contour and therefore would not be exposed to excessive noise levels.

Future residential development at Sites 14, 15, 18, 19, and 21 would be required by the California Building Standards Code (Title 24), ALUCP (Policy NP-4) and San Bruno General Plan (Policy HS-35) to achieve an interior noise level of 45 dB CNEL or less. For residential structures exposed to

aircraft noise above CNEL 60 dB, Title 24, Part 2 of the California Building Standards Code requires an acoustical analysis is required to demonstrate compliance with this requirement. Since Sites 15, 18, and 21 were zoned for residential use as of the effective date of the SFO ALUCP (November 8, 2012), future residential development at these sites is considered compatible with the SFO ALUCP and residents at these sites would not be exposed to excessive noise levels with adherence to the aforementioned regulations. Although Sites 14 and 19 are located in the 70-75 dB CNEL contour and development of housing on these sites would require a Local Agency Override of the ALUCP (refer to the discussion in Section 2.5.3), the Noise and Vibration Assessment (refer to Appendix B and the discussion under Impact NOI-3 in Section 4.13 of this Initial Study) determined that future residential development at Sites 14 and 19 would be able to achieve a 45 dB CNEL interior as required by Airport Land Use Compatibility Policy NP-4 and General Plan Policy HS-35. Furthermore, Title 24 and General Plan Policy HS-35 would prohibit the issuance of occupancy permits for residential development that would expose future residents to an interior noise level of greater than 45 dB CNEL. Accordingly, the Housing Element Update's incompatibility with the noise compatibility policies provided in the ALUCP would not result in the exposure of future residents of Sites 14 and 19 to excessive noise levels.



HOUSING OPPORTUNITY SITES AND SFO 2020 NOISE EXPOSURE CONTOURS (DB, CNEL)

FIGURE 4.13-2

4.14 POPULATION AND HOUSING

4.14.1 Environmental Setting

4.14.1.1 *Regulatory Framework*

State

Housing-Element Law

State requirements mandating that housing be included as an element of each jurisdiction's general plan is known as housing-element law. The Regional Housing Need Allocation (RHNA) is the state-mandated process to identify the total number of housing units (by affordability level) that each jurisdiction must accommodate in its housing element. California housing-element law requires cities to: 1) zone adequate lands to accommodate its RHNA; 2) produce an inventory of sites that can accommodate its share of the RHNA; 3) identify governmental and non-governmental constraints to residential development; 4) develop strategies and a work plan to mitigate or eliminate those constraints; and 5) adopt a housing element and update it on a regular basis.¹¹² The City of San Bruno Housing Element and related land use policies were last updated on July 30, 2015.

Regional and Local

Plan Bay Area 2050

Plan Bay Area 2050 is the long-range plan for the nine-county San Francisco Bay Area that provides strategies that increase the availability of affordable housing, support a more equitable and efficient economy, improve the transportation network, and enhance the region's environmental resilience. Plan Bay Area 2050 promotes the development of a variety of housing types and densities within identified Priority Development Areas (PDAs). PDAs are areas generally near existing job centers or frequent transit that are locally identified for housing and job growth.¹¹³

ABAG allocates regional housing needs to each city and county within the San Francisco Bay Area, based on statewide goals. These allocations are designed to lay the foundation for Plan Bay Area 2050's long-term envisioned growth pattern for the region. ABAG also develops a series of forecasts and models to project the growth of population, housing units, and jobs in the Bay Area. ABAG, MTC, and local jurisdiction planning staff created the Forecasting and Modeling Report, which is a technical overview of the of the growth forecasts and land use models upon which Plan Bay Area 2050 is based.

City of San Bruno General Plan

Various policies in the City's General Plan have been adopted for the purpose of avoiding or mitigating population and housing impacts resulting from planned development within the City, including the following:

¹¹² California Department of Housing and Community Development. "Regional Housing Needs Allocation and Housing Elements" Accessed October 24, 2022. <https://www.hcd.ca.gov/planning-and-community-development/housing-elements>

¹¹³ Association of Bay Area Governments and Metropolitan Transportation Commission. *Plan Bay Area 2050*. October 21, 2021.

Policies	Description
LUD-F	Promote infill and revitalization of the city’s shopping centers – including the continued improvement of The Shops at Tanforan and Towne Center – to attract shoppers from throughout the region using convenient BART and Caltrain access.
LUD-20	Promote establishment of strong regional retail anchors in The Shops at Tanforan and Towne Center. Support the further redevelopment and expansion of The Shops at Tanforan, and work with the developer and San Bruno Chamber of Commerce to market the center to a wider regional audience.
LUD-21	<p>Strengthen the identity of the existing internal “street” network in The Shops at Tanforan and Towne Center. Encourage transition of these two centers into an outdoor/indoor shopping “district,” as illustrated in Figure 2-6. Implement the following design techniques:</p> <ul style="list-style-type: none"> • Promote reuse and infill of existing surface parking lots. • Strengthen the existing internal street network (as shown in the concept diagram) to promote walkability between stores, services, and restaurants. • Ensure that the street network links the two shopping centers and preserves the visibility of the existing shopping complexes from El Camino Real. • Design all new commercial spaces to be located and oriented toward the walkable internal streets and toward Sneath Lane, with clear connections to enclosed mall entrances. • Create fluid and visible pedestrian connections to and from the San Bruno BART Station. • In accordance with Ordinance 1284, consider construction of necessary parking structures to replace existing surface parking lots. Locate parking structures along the edges of the shopping district to minimize vehicular traffic on internal pedestrian-oriented streets. • Improve landscaping along El Camino Real to differentiate and announce the “district” from other developments along El Camino Real. • Incorporate gateway features on El Camino Real near the northern edge of Towne Center where San Bruno’s northern boundary exists. • Develop a uniform signage plan to coordinate signs along the internal shopping streets with signs along El Camino Real. • Coordinate with the San Bruno Chamber of Commerce to market the new “district” as a regional marketplace.
LUD-80	Amend zoning districts and development standards in the Zoning Ordinance consistent with land use classifications in the General Plan, particularly as it relates to mixed-use development along El Camino Real, the Transit Oriented Development district, and intensification within the Tanforan District.

4.14.1.2 *Existing Conditions*

According to the California Department of Finance, the City of San Bruno had a population of 42,656 as of January 1, 2022, a 1.18 percent decrease from the previous year.¹¹⁴ ABAG projects the City’s population will be 51,370 by 2040.¹¹⁵ As of 2022, there were 16,696 households with an

¹¹⁴ California Department of Finance. “E-1 Population Estimates for Cities, Counties, and the State – January 1, 2021 and 2022.” Accessed August 4, 2022. <https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2022/>

¹¹⁵ Association of Bay Area Governments. *Projections 2040, A Companion to Plan Bay Area 2040*. November 2018.

average of 2.64 persons per household.¹¹⁶ None of the Housing Opportunity Sites are developed with housing.

4.14.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
1) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Impact POP-1: The project would not induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).
(No Impact)

As discussed in Sections 3.1.2 and 3.1.3, state law requires local jurisdictions to update their respective housing elements to account for their regional housing needs allocation. The City of San Bruno's fair share of the regional housing need for 2023 to 2031 was calculated as 3,165 housing units. Factoring in HCD's recommendation to create a buffer in the housing element inventory of at least 15 percent (equivalent to 475 units) in accordance with the No Net Loss Law, state and regional plans intend for San Bruno to construct an additional 3,640 housing units (refer to Table 3.1-1), which corresponds to an additional 9,610 residents by the year 2031.¹¹⁷

Buildout of the Housing Opportunity Sites (refer to Table 3.2-1) identified in the Housing Element Update would result in an additional 2,709 units, which corresponds to an additional 7,152 residents by the year 2031.¹¹⁸ All of the Housing Opportunity Sites with the exception of Site 14 are designated/zoned for residential uses under the City's General Plan and Municipal Code. The remaining regional housing needs allocation would be satisfied through the construction of 669 units

¹¹⁶ United States Census Bureau. Quick Facts, San Bruno city, California. Accessed October 24, 2022.

<https://www.census.gov/quickfacts/fact/table/sanbrunocitycalifornia/PST040219#qf-flag-X>

¹¹⁷ 3,640 housing units multiplied by 2.64 (average number of residents per unit in San Bruno) equals 9609.6.

¹¹⁸ 2,708 housing units multiplied by 2.64 (average number of residents per unit in San Bruno) equals 7,149.12. 2,709 units multiplied by 2.64 equals 7,151.76. After completion of the analysis presented in this Initial Study, the number of units assumed at Sites 8 and 21 increased by one unit each, the number of units assumed at Site 22 decreased by one unit, and the number of pipeline units decreased by one unit, resulting in a net increase of one unit and two residents assumed at the Housing Opportunity Sites (2,708 units versus 2,709 units, 7,150 residents versus 7,152 residents) and no increase in the total number of units and residents assumed for the Housing Element Update as a whole (3,618 units and 9,552 residents total). This change would not affect any of the conclusions presented herein in this Initial Study.

that have already received discretionary entitlements and 240 ADUs that are allowed by right under the Municipal Code. In total, buildout of the Housing Element Update would result in the construction of 3,618 housing units, which corresponds to an additional 9,552 residents.¹¹⁹

All of the Housing Opportunity Sites are currently designated for residential development in the General Plan, with the exception of Site 14. Redevelopment of Site 14 with up to 1,000 housing units (equivalent to an additional 2,640 residents) is consistent with General Plan policies LUD-F, LUD-20, LUD-21, and LUD-80 (refer to Section 4.14.1.1), which call for mixed-use infill redevelopment of the Shops at Tanforan. Therefore, implementation of the Housing Element Update would not induce substantial unplanned population growth.

Impact POP-2: The project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. **(No Impact)**

None of the Housing Opportunity Sites are developed with housing; therefore the Housing Element Update would not displace substantial numbers of existing people or housing necessitating the construction of replacement housing elsewhere.

¹¹⁹ 3,618 housing units multiplied by 2.64 (average number of residents per unit in San Bruno) equals 9,551.52.

4.15

PUBLIC SERVICES

4.15.1

Environmental Setting

4.15.1.1

Regulatory Framework

State

Government Code Section 66477

The Quimby Act (included within Government Code Section 66477) requires local governments to set aside parkland and open space for recreational purposes. It provides provisions for the dedication of parkland and/or payment of fees in lieu of parkland dedication to help mitigate the impacts from new residential developments. The Quimby Act authorizes local governments to establish ordinances requiring developers of new residential subdivisions to dedicate parks, pay a fee in lieu of parkland dedication, or perform a combination of the two.

Government Code Section 65995 through 65998

California Government Code Section 65996 specifies that an acceptable method of offsetting a project’s effect on the adequacy of school facilities is the payment of a school impact fee prior to the issuance of a building permit. Government Code Sections 65995 through 65998 set forth provisions for the payment of school impact fees by new development by “mitigating impacts on school facilities that occur (as a result of the planning, use, or development of real property” (Section 65996[a]). The legislation states that the payment of school impact fees “are hereby deemed to provide full and complete school facilities mitigation” under CEQA (Section 65996[b]).

Developers are required to pay a school impact fee to the school district to offset the increased demands on school facilities caused by the proposed residential development project. The school district is responsible for implementing the specific methods for mitigating school impacts under the Government Code.

Regional and Local

County of San Mateo Trails Master Plan

Adopted in 2001, the County of San Mateo Trails Master Plan is intended to, among other objectives, provide policies and guidelines for trails planning and to define environmental issues and mitigation measures for trail management.

City of San Bruno General Plan

Various policies in the City’s General Plan have been adopted for the purpose of avoiding or mitigating impacts on public services resulting from planned development within the City including the following:

Policies	Description
HS-1	Regulate development, including remodeling or structural rehabilitation, to assure adequate mitigation of safety hazards on sites having a history or threat of slope instability, erosion,

Policies	Description
	subsidence, seismic dangers (including those resulting from liquefactions, ground failure, ground rupture), flooding, and/or fire hazards (Figure 7-2).
HS-2	<p>Review and revise the City's Building Code, Zoning Ordinance, and Subdivision requirements to safeguard against seismic, geologic, and safety hazards. Mitigation should include:</p> <ul style="list-style-type: none"> • Minimal grading and removal of natural vegetation to prevent erosion and slope instability. • Cleared slopes should be replanted with vegetation. • Proper drainage control to prevent erosion of the site and affected properties. Careful siting and structural engineering in unstable areas. • Consideration of flooding and fire hazards in siting and designing new development.
LUD-76	Assure that new development mitigates impacts on existing public services, including transit services, water, sewer, and storm drainage systems, police and fire protection, libraries, and parks and recreation facilities.
OSR-1	Maintain a parkland dedication/in lieu fee standard of 4.5 acres/1,000 residents.
OSR-2	Amend the City's Zoning Ordinance to ensure that all developments are subject to dedication/in lieu fee requirements, whether or not such developments result from subdivision.
OSR-3	Revise the City's Park In-Lieu Fee to create an option (at the City's discretion) to accept either Park In-Lieu Fees or require the developer to design/build parks and/or recreation facilities as part of the development.
OSR-4	Undertake a program to add 20 acres of parkland to the City system over the next 20 years. Seize all opportunities to develop and/or maintain parks and recreation facilities within existing residential neighborhoods through acquisition or preservation of former school facilities.
OSR-5	Strive to locate neighborhoods park facilities within 1/3-mile walking distance of all residences in San Bruno. If limited in some neighborhoods, coordinate with local school districts to allow use of playgrounds and sports facilities after school hours.
OSR-6	Provide small public parks and/or plazas within BART and Caltrain station areas, within Downtown, and along El Camino Real. Provide benches, water fountains, and trees to serve as resting areas for pedestrians, commuters, and shoppers.
OSR-7	As former Skyline College properties are developed for single-family residential neighborhoods, create an option (at the City's discretion) for development of parks and/or recreation facilities to serve San Bruno residents.
OSR-9	Actively implement the City's Comprehensive Parks and Recreational Facilities Master Plan, which more fully identifies park and recreation needs and deficiencies.
OSR-10	Continue coordination with San Bruno Park School District (per the Five-Year Joint Use Agreement, 2002) to allow joint use of school facilities for after-school programs, sports leagues, and non-organized play.
OSR-12	Study potential locations and funding mechanisms for the development of a Teen Recreation Center that provides the types of programs and activities to successfully attract the City's teens.

Policies	Description
OSR-13	Design and construct non-traditional recreation facilities (skateboarding/BMX bike park, rock climbing wall, etc) to provide alternative forms of recreation for the City's teens. Coordinate this facility with the Parks and Recreation Commission.
OSR-14	Continue to support and expand adult (50+) programs and activities offered at the Senior Center. Develop plans to expand the facility as needed to accommodate the City's senior population.
OSR-15	Study potential sites and funding mechanisms for relocation of the San Bruno Swim Center, or development of a new multi-programmed Aquatics Facility.
PFS-3	Require, as part of plan review, identification of needed public service improvement and maintenance costs for those projects that may have a significant impact on existing services.
PFS-5	Develop a Civic Center Complex Master Plan, in order to coordinate rehabilitation and expansion of the various City departments and service providers.
PFS-26	Ensure adequate staffing and facilities for the City's Police and Fire Departments to achieve desired levels of service, particularly surrounding transit areas and along urban-interface hazard areas.
PFS-27	Consider rebuilding or rehabilitating Fire Station No. 51 to accommodate current and future Fire Department needs, Americans with Disabilities Act standards, and seismic requirements. The new Fire Station could include a community meeting room.
PFS-28	Consider relocating Fire Station No. 52 to a safe site outside of the San Andreas Earthquake Fault Zone. Maintain existing or better levels of service to neighborhoods in the northern and western neighborhoods.
PFS-29	Establish a separate radio channel for use by city crews and firefighters during emergencies. Obtain funding for information technology systems, such as wireless communication systems, to further decrease fire and police response times.
PFS-30	Require installation and maintenance of fire protection measures in high-risk and urban-interface areas (Figure 8-2): <ul style="list-style-type: none"> • Proper siting and access; • Brush clearance (non-fire resistant landscaping 50 feet from structures); • Use of fire resistive materials (pressure-impregnated, fire resistive shingles or shakes); • Landscaping with fire resistive species; and • Installation of early warning systems (alarms and sprinklers).
PFS-31	Ensure adequate fire water pressure as a condition of approval for all new development projects.
PFS-32	Require installation of residential sprinklers in areas with steep slopes and/or diminished access.
PFS-33	Consider the feasibility of establishing a Fire Risk Assessment Zone within and surrounding high-risk and urban-interface areas (Figure 8-2).
PFS-34	Identify and remove mature and/or diseased Eucalyptus trees in rights-of-way and other open areas, if they pose a fire hazard or other threat to health and safety.

Policies	Description
PFS-35	Require installation of automatic sprinkler systems in all hotel, motel, and other overnight lodging facilities, in mixed commercial/residential uses, and in apartment buildings of three or more units.
PFS-37	Continue to clear fire hazardous materials from Crestmoor Canyon that pose a threat to nearby residents. Care should be taken to prevent unnecessary harm to healthy vegetation. Ensure continued use by the Fire Department should the existing fire road be transitioned to a multi-use trail.
PFS-38	Ensure proper maintenance of the open space areas in western residential neighborhoods. Vegetation maintenance is necessary to prevent potential fire hazards.
PFS-39	Minimize risks to single-access residential neighborhoods by providing alternative access for fire and other emergency personnel.
PFS-40	Acknowledge the regional implications of natural hazards and the need for jurisdictional cooperation in the face of potential disasters. Coordinate emergency response planning with surrounding cities, agencies, and San Mateo County Office of Emergency Services.
PFS-41	Create and maintain an up-to-date Emergency Operations Plan with information including but not limited to evacuation routes and procedures, chain of command communication structure, alerts and warning systems, emergency shelter provisions, and responsibilities and instructions for all relevant departments (police, fire, hazardous materials, emergency medical services, public works).
PFS-42	Conduct emergency drills in public buildings, large office developments, and in coordination with local schools. Hold post-drill training seminars to identify needed improvements to emergency preparedness.
PFS-43	Work with critical use facilities (i.e., hospitals, schools, public assembly facilities, transportation services) to assure that they can provide alternate sources of electricity, water, and sewage disposal in the event that regular utilities are interrupted in a disaster.
PFS-44	Establish a public education program through local schools, county fair, civic organizations, and other service groups to distribute information about emergency preparedness. Develop a brochure indicating what to do and where to go in the event of safety, seismic, or emergency events.
PFS-45	Continue to participate in a cooperative San Mateo County program to pool natural hazard data which are developed either through special studies or via the plan review process.
PFS-46	Coordinate with regional, State, and federal agencies to determine appropriate disaster recovery strategies for after a major natural or man-made event. Publicize recovery measures along with emergency preparedness information.
PFS-50	Develop a primary Emergency Operations Center and a secondary Emergency Operations Center for the management and coordination of disasters in our community.
PFS-51	Work cooperatively with local school districts to monitor the growth of the school-age population within the San Bruno, and the subsequent need for school sites and facilities.
PFS-52	Provide technical assistance to local school districts in design and planning for reuse of former school sites throughout the City. Consider acquisition or leasing of former school sites for recreation, education, or other community needs.

Policies	Description
PFS-53	Maintain good communication with the local school districts, and integrate school facilities planning with the City's objectives, including: <ul style="list-style-type: none"> • Designing school facilities to allow safe pedestrian and bicycle access; • Ensuring construction of traffic calming measures on surrounding streets; • Designing attractive facilities that contribute to neighborhood identity and pride; and • Allowing public use of recreational facilities on school sites on evenings and weekends.
PFS-55	Provide a wide range of library services to San Bruno residents through a strong main Public Library facility.
PFS-56	Study potential locations and funding mechanisms for development of a larger Public Library facility. Focus on sites within the Civic Center complex, as recommended by the Ad Hoc Library Citizens Committee.
PFS-57	Continue San Bruno's relationship with Skyline College by coordinating collections and sharing resources through their common partnership with the Peninsula Library System.
PFS-58	Continue to provide public access to the Internet and other computer-based resources through the San Bruno Public Library facility.
PFS-59	In order to prevent anticipated future population growth in San Bruno from burdening existing over-extended library services, City staff will ensure upon individual project review that the developer sets aside contributions or in-lieu fees in general proportion to the burden proposed new residential development would have on the library system, and that those fees are used to improve public library facilities. The per capita share will be negotiated between the Ad Hoc Library Citizen's Committee, City Staff, and City Council, within 1 year of Plan adoption, and will be applied uniformly (and if necessary, retroactively) across all residential development occupancy permit applications submitted after Plan adoption, until such time as an alternative form of support is provided, or the library facilities are fully upgraded to the requirements as described on pages 8-12.

City of San Bruno Municipal Code

Pursuant to Section 10.15.050 of the City's Municipal Code, all facilities with fire suppression systems are required to meet certain technical specifications, including having an approved backflow prevention assembly with a double check valve. The ordinance also requires fire protection systems to be constructed with approved potable water piping and material. Section 11.24.010 requires project to comply with the 2019 California Fire Code and 2019 International Fire Code. As established by Municipal Code Section 12.44, the City maintains a parkland dedication/in-lieu fees standard of 4.5 acres per 1,000 residents.

Pursuant to Section 12.260 of the City's Municipal Code, the City assesses fees upon development projects to fully or partially offset the costs of public facilities and infrastructure that is needed to serve new demand created by development projects. Effective July 1, 2022, the development impact fee is \$29,494.53 per single-family residential unit and \$27,083.16 per multi-family residential unit.¹²⁰

¹²⁰ City of San Bruno. *FY2022-23 Master Fee Schedule*. July 2022.

City of San Bruno Development Impact Fees Nexus Study

The City of San Bruno prepared the San Bruno Development Impact Fee Nexus Study designed to provide the City of San Bruno with the necessary technical documentation in order to adopt a comprehensive development impact fee program. As discussed in the nexus study, development impact fees are one-time charges on new development projects that are collected and used by jurisdictions to cover the cost of capital facilities and infrastructure needed to serve the new residential and development growth. Impact fees are regulated by Assembly Bill (AB) 1600 (Government Code Section 66000 et seq.). The purpose of the nexus study is to determine the maximum allowable fees that the City can charge for facilities and infrastructure consistent with the legal requirements of AB 1600. Fees collected under AB 1600 are to be collected for capital facility and infrastructure improvements only, used to fund facility needs created by new development rather than existing deficiencies, and the fees are to be based on a rational nexus between new development and the costs of the capital facilities and infrastructure needed to accommodate such development.

4.15.1.2 *Existing Conditions*

Fire Protection Services

Fire protection services are provided by the San Bruno Fire Department (SBFD), which employs 32 full-time firefighters and five administrative and support staff employees operating out of two fire stations.¹²¹ Station 51 is located on the south side of the City Hall complex at 555 El Camino Real and covers the area east of Interstate 280. Station 52 is located near the intersection of Sneath Lane and Earl Avenue at 1999 Earl Avenue and responds to emergency calls west of I-280. A Community Risk Assessment prepared for the SBFD in October 2022 determined that the general condition of both fire stations was poor and in need of replacement; the assessment also recommended relocating Station 52 to a vacant lot at the northwest corner of the San Bruno Avenue and Glenview Drive intersection. The SBFD currently has an average “call received to first unit arrival” response time of seven minutes and 36 seconds, which is below the National Fire Protection Association (NFPA) performance goal of six minutes and 30 seconds. The Community Risk Assessment also identified staffing deficits during high-rise structure fire, motor vehicle accident, and trench rescue events.

The SBFD is also subject to the San Mateo County Joint Powers Agreement (JPA), which requires that the closest available paramedic engine company respond to calls for emergency medical service, and the closest available engine and truck company respond to fire calls. In addition, a full assignment response such as a fire, fire alarm, or other type of call, which would necessitate a large response, requires three engines; therefore an additional engine would need to come from a neighboring jurisdiction in an event requiring a full assignment response.

¹²¹ San Bruno Fire Department/AB Triton Consulting. *Community Risk Assessment: Standards of Cover & Deployment Analysis*. October 2022.

Housing Opportunity Site 6 is serviced by Station 52; the remaining Housing Opportunity Sites are served by Station 51.

Police Protection Services

Police protection services are provided by the San Bruno Police Department (SBPD). Police headquarters are located at 1177 Huntington Avenue and share the facilities with BART police. SBPD employs 48 sworn officers (equivalent to 11 officers for every 10,000 residents) who provide police services and public safety dispatching to the City of San Bruno.¹²² SBPD deploys officers in a beat management system, which divides the City into four beats; as shown on Figure 4.15-1, Beat One encompasses Housing Opportunity Sites 7, 14, 15, 18, 19, and 21; Beat Two encompasses Sites 2, 4, 5, 8, 9, 10, 11, 12, 16, 17, 22, and 23; Beat Three encompasses Site 6; Beat Four encompasses Sites 1, 3, 13, and 20.

The San Bruno Development Impact Fee Nexus Study (refer to Section 4.15.1.1) identified the need for specific upgrades and additions to help the Police Department serve new growth in the City. These include the expansion of the Evidence Room at a cost of \$650,000, upgrades to the Dispatch Center at a cost of \$700,000, the creation of a satellite police substation at a cost of \$30,000, upgrades to surveillance and tracking technology at a cost of \$525,000, and the replacement of police vehicles at a cost of \$4,075,983.

Schools

Four public school districts serve San Bruno residents: San Bruno Park School District (SBPSD), Millbrae Elementary School District (MESD), South San Francisco Unified School District (SSFUSD), and the San Mateo Union High School District (SMUHSD). SBPSD, MESD, and SSFUSD serve grades K through eight; SMUHSD serves grades nine through 12.

None of the Housing Opportunity Sites are in the SSFUSD service area. Within the SBPSD service area, Sites 1, 2, 3, 4, 5, 7, 8, 9, 11, 12, 13, 14, 15, 17, 18, 19, 20, 21, 22, and 23 are served by Allen Elementary, located at 875 Angus Avenue West in San Bruno. Site 6 is served by Rollingwood Elementary, located at 2500 Cottonwood Drive in San Bruno. Within the MESD school district, Sites 10 and 16 are served by Lomita Park Elementary, located at 200 Santa Helena Avenue in San Bruno. Within the SMUHSD service area, Sites 10 and 16 are served by Mills High School, located at 400 Murchison Drive in Millbrae; the remaining Housing Opportunity Sites are served by Capuchino High School, located at 1501 Magnolia Drive in San Bruno.

¹²² San Bruno Police Department. *San Bruno General Plan Draft Environmental Impact Report*. December 2008.

FIGURE 4.15-1

Enrollment in SBPSD schools has been steadily declining, with enrollment numbers declining by approximately 23.4 percent between 2015 and 2021.¹²³ Rollingwood Elementary is scheduled to close in June 2023; the SBPSD is currently in the process of redrawing school attendance boundaries to distribute the students that attend Rollingwood Elementary to the remaining four SBPSD schools for the 2023-2024 school year.¹²⁴ Enrollment at MESD schools declined by approximately 12.6 percent between 2015 and 2021.¹²⁵ Conversely, enrollment at SMUHSD schools increased by approximately 11.9 percent, although enrollment numbers at Mills High School and Capuchino High School have remained relatively constant, with a net change of minus 42 students and minus four students, respectively.^{[126][127][128]}

Parks

San Bruno currently provides its residents with a total of 71 acres of city parkland. There are five small pocket parks, 12 neighborhood parks, and one large community park. The Parks and Recreation Services Department maintains all developed municipal park sites, street medians, and landscaping (including approximately 128 acres of open space and 7,250 trees) along San Mateo Avenue and at other City facilities. In addition to City parks, local recreation centers, school facilities, and a 108-acre regional park – San Mateo County’s Junipero Serra Park – provide recreational opportunities for San Bruno residents. Hiking and cycling trails are located west of the City boundary within the Golden Gate National Recreation Area and the San Francisco Peninsula Watershed, accessible from Sneath Lane and San Bruno Avenue. San Bruno City Park, Grundy Park, and Lion’s Field are the City’s most utilized parks.

As noted in Section 4.15.1.1, the City maintains a parkland standard of 4.5 acres per 1,000 residents. The existing park acreage in the City is 199 acres (71 acres of City parkland plus Junipero Serra Park), which based on the existing population of 42,656 residents, equates to 4.66 acres per 1,000 residents.¹²⁹

¹²³ California Department of Education Data Quest. “Enrollment Multi-Year Summary by Grade, San Bruno Park Elementary Report 41-69013”. Accessed November 14, 2022.

<https://dq.cde.ca.gov/dataquest/dqcensus/EnrGrdYears.aspx?cds=4169013&agglevel=district&year=2021-22>

¹²⁴ San Bruno Park School District. “New Attendance Boundary Info”. Accessed November 14, 2022.

<https://www.sbpsd.org/page/new-attendance-boundary-info>

¹²⁵ California Department of Education Data Quest. “Enrollment Multi-Year Summary by Grade, Millbrae Elementary Report 41-68973”. Accessed November 14, 2022.

<https://dq.cde.ca.gov/dataquest/dqcensus/EnrGrdYears.aspx?cds=4168973&agglevel=district&year=2021-22>

¹²⁶ California Department of Education Data Quest. “Enrollment Multi-Year Summary by Grade, San Mateo Union High Report 41-69047”. Accessed November 14, 2022.

<https://dq.cde.ca.gov/dataquest/dqcensus/EnrGrdYears.aspx?cds=4169047&agglevel=district&year=2021-22>

¹²⁷ California Department of Education Data Quest. “Enrollment Multi-Year Summary by Grade, Mills High Report 41-69047-4134557”. Accessed November 14, 2022.

<https://dq.cde.ca.gov/dataquest/dqcensus/EnrGrdYears.aspx?cds=41690474134557&agglevel=school&year=2021-22>

¹²⁸ California Department of Education Data Quest. “Enrollment Multi-Year Summary by Grade, Capuchino High Report 41-69047-4130738”. Accessed November 14, 2022.

<https://dq.cde.ca.gov/dataquest/dqcensus/EnrGrdYears.aspx?cds=41690474130738&agglevel=school&year=2021-22>

¹²⁹ 42,656 divided by 1,000 equals 42.656; 199 acres divided by 42.656 equals 4.665.

Other Public Facilities

The San Bruno Public Library is located off El Camino Real adjacent to City Hall at 701 Angus Avenue W. A member library of the Peninsula Library System, the San Bruno Public Library provides children and adult programming as well as Spanish and Japanese language materials, and has over 120,000 circulating items including books, magazines, videos, DVDs, CDs, and books on tape and CD.

There are four different recreation centers in San Bruno: the Belle Air Community Center, the Veterans Memorial Recreation Center, the San Bruno Senior Center, and the Portola Performing Arts Center.

4.15.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
1) Fire Protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2) Police Protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5) Other Public Facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Public services are provided to the community as a whole, usually from a central location or from a defined set of nodes. The resources base for delivery of the services, including the physical service delivery mechanisms, is financed on a community-wide basis, usually from a unified or integrated financial system. The service delivery can be provided by a city, county, service, or other special district. Usually, new development will create an incremental increase in the demand for these services. The amount of the demand will vary widely, depending on both the nature of the development (residential vs. industrial, for instance) and the type of services, as well as on the specific characteristics of the development (such as senior housing vs. family housing). The impact of a particular project on public services and facilities is generally a fiscal impact. By increasing the demand for a type of service, a project could cause an eventual increase in the cost of providing the service (more personnel hours to patrol an area, additional fire equipment needed to service a tall building, etc.). CEQA requires analysis of fiscal impacts to the extent that increased demand triggers the need for a new facility (such as a school or fire station), since the new facility would have physical effects on the environment.

Impact PS-1:	The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services. (Less than Significant Impact)
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As noted in Section 4.15.1.2, the SBFD is currently not meeting staff service ratios and response time performance objectives, and both stations are in need of replacement. Additionally, the Community Risk Assessment recommended relocating Station 52 from its current location at 1999 Earl Avenue approximately 2,275 feet to the south to a vacant lot located at the northwest corner of the San Bruno Avenue and Glenview Drive intersection.

Redevelopment of the Housing Opportunity Sites would add substantial population to the City which is expected to increase demand for fire protection services. Demand for fire protection services at the sites would be reduced with mandatory adherence to General Plan and Municipal Code policies and requirements identified in Section 4.15.1.1 by future development projects. As shown on Figure 4.20-1, Site 6 is located within a Wildland Fire Hazard Area, and Sites 3 and 14 are partially within a Wildland/Urban Interface Area. Accordingly, Sites 3, 6, and 14 would be required to comply with General Plan Policy PFS-30, which would require the installation and maintenance of a variety of fire protection measures, thus reducing site-specific demand generated by redevelopment of these sites.

Payment of development impact fees and taxes by future development would contribute to the replacement of Station 51 and the potential construction of a new Fire Station 52 at the vacant lot located at the northwest corner of the San Bruno Avenue/Glenview Drive intersection. As noted above, the need for new or physically altered fire stations exists and would not be a direct result of the Housing Element Update.

While the specific details of any future alterations or replacement of Station 51 are not currently known, replacement of Station 51 is anticipated to be found categorically exempt under CEQA Guidelines Section 15302, given that it would involve the replacement of an existing facility on the same site with fundamentally the same purpose and capacity as the structure replaced, and none of the exceptions identified in Section 15300.2 appear to be present. Future project-level CEQA review would be required to replace Fire Station 51, but it is not foreseeable at this time that any significant impacts would result that would not be adequately addressed through standard requirements and measures regularly imposed on new development.

Prior to the demolition of Station 52, all ACMs, lead-based paint, and PCBs would be removed in accordance with Section 19827.5 of the California Health and Safety Code, BAAQMD regulations (specifically Regulation 11, Rule 2, Hazardous Materials; Asbestos Demolition, Renovation and Manufacturing) and Cal/OSHA requirements (refer to Section 4.9.1.1). Construction of a new fire station at the vacant lot located at the northwest corner of the San Bruno Avenue and Glenview Drive intersection is not anticipated to result in any significant environmental effects that cannot be mitigated, given that:

- Fire stations are generally a low-impact land use in terms of vehicle trips, emissions, consumption of resources (electricity, natural gas, gasoline, water) and generation of waste, hazardous materials and emissions, ground disturbance, and noise and vibration;
- Fire Stations are commonly located adjacent to sensitive receptors (as the current Station 52 is);
- The existing height limitation imposed by Ordinance 1284 and a corresponding modest building footprint and size;
- The absence of any agricultural/forestry resources, special-species habitat (refer to Figure 4.4-1), historic buildings (refer to Figure 4.5-2), geological and soil concerns (refer to Figure 4.7-1), soil contamination¹³⁰, and waterways (refer to Figure 4.10-1).
- Consistent with the findings of the Community Risk Assessment, construction of a new fire station would improve response times, thereby resulting in a beneficial impact on fire protection services.

Both the replacement of Station 51 and relocation of Station 52 would be subject to project-level environmental review once specific station plans have been set forth and funds have been allocated. Based on the aforementioned reasons, it is anticipated that the new or altered stations would either be found categorically exempt or, if deemed ineligible for categorical exemption, that any potentially significant impacts identified can be reduced to a less than significant level through mitigation, thereby resulting in a mitigated negative declaration. For the reasons stated above, implementation of the Housing Element Update would not result in substantial adverse physical environmental impacts associated with the provision of new or physically altered fire protection facilities in order to maintain acceptable service ratios, response times, or other performance objectives.

Impact PS-2:	The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection services. (Less than Significant Impact)
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As documented in Section 4.15.1.2, the SBPD is currently providing 11 officers for every 10,000 residents; the City's target service ratio is to meet the national average of 16.6 officers for every 10,000 residents. Additionally, the City of San Bruno Development Impact Fees Nexus Study (refer to Section 4.15.1.1) determined that renovations to the existing police headquarters were necessary in order to serve projected growth in the City.

Redevelopment of the Housing Opportunity Sites would substantially increase the City's population, which is expected to increase demand for police protection services in comparison with the existing development at these sites. The renovations identified in the nexus study, which include the expansion of the Evidence Room and upgrades to the Dispatch Center, would not require substantial construction or result in a change of use or intensity of operations that could have an environmental

¹³⁰ California Environmental Protection Agency. "Cortese List Data Resources." Accessed November 15, 2022. <https://calepa.ca.gov/sitecleanup/corteselist/>.

impact. The nexus study also identified the need for a satellite police substation at a cost of \$30,000, which would involve the setup of a small portable building on a yet to be determined site. No construction activity would be required to install the portable building, and due to its small size and intended use, operation of the police substation is not anticipated to incur any potentially significant impacts. Project-level review of the police substation would be required once a specific plan has been proposed, and is anticipated to either be categorically exempt or eligible for a Negative Declaration, and therefore would not result in any significant environmental impacts.

Payment of development impact fees and taxes by future development would contribute to the completion of the improvements to the police headquarters and installation of the police substation identified in the nexus study. These actions would require subsequent project-level analysis, and for the aforementioned reasons are not anticipated to result in any significant environmental impacts. For the reasons stated above, implementation of the Housing Element Update would not result in substantial adverse physical environmental impacts associated with the provision of new or physically altered police facilities in order to maintain acceptable service ratios, response times, or other performance objectives.

Impact PS-3:

The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for schools. **(Less than Significant Impact)**

As discussed in Section 4.14.2 under Impact POP-1, buildout of the Housing Element Update would result in the construction of an additional 3,618 housing units. Of these 3,618 housing units, 669 units are associated with pipeline projects which have already undergone review of their impacts to school facilities and have paid or will pay their development impact fees, and 240 units are ADUs, which are not anticipated to generate significant numbers of students and whose location is undetermined at this time, and therefore their respective school district is not reasonably foreseeable. Sites 10 and 16 would be the only sites to generate students at Lomita Park Elementary, Taylor Middle, and Mills High, and given that these sites would be redeveloped under the project with only four single-family residences, would not result in substantial adverse effects on these facilities.

Of the remaining 2,704 housing units, this analysis assumes that the project would result in the construction of 134 single-family units and 2,570 multi-family units.^{[131][132]} Using the SBPSD “single-family detached” and “multi-family” student generation rates for elementary and middle school students, buildout of these 2,704 units would generate 204 elementary and middle school

¹³¹ Based on an assumption that Sites 6 and 8 would be developed with single-family units, and the remaining sites would be developed with multi-family units.

¹³² After completion of the analysis presented in this Initial Study, the number of units assumed at Sites 8 and 21 increased by one unit each, the number of units assumed at Site 22 decreased by one unit, and the number of pipeline units decreased by one unit, resulting in a net increase of one unit and two residents assumed at the Housing Opportunity Sites (2,708 units versus 2,709 units, 7,150 residents versus 7,152 residents) and no increase in the total number of units and residents assumed for the Housing Element Update as a whole (3,618 units and 9,552 residents total). This change would not affect any of the conclusions presented herein this Initial Study.

students total.¹³³ Using the SMUHSD “single-family residential” and “multi-family” student generation rates, buildout of the 2,704 units would generate 143 high school students at Capuchino High.¹³⁴

As documented in Section 4.15.1.2, enrollment in the SBPSD declined from 2,727 students to 2,087 students (minus 640 students) between 2015 and 2021, which is greater than the number of students that would be generated by Housing Opportunity Sites (204 students) within the SBPSD service area. Accordingly, the increase in enrollment generated by the Housing Element Update is not anticipated to exceed the available capacities of the SBPSD facilities such that new or expanded facilities would be required. Further, consistent with Government Code Sections 65995 through 65998 (refer to Section 4.15.1.1 Regulatory Framework), school impact fees will be paid to the affected school districts prior to the issuance of a building permit by the City. These funds would be used by SBPSD to accommodate additional students, and support the reopening of Rollingwood Elementary, if necessary.

Conversely, enrollment in the SMUHSD increased from 8,626 students to 9,655 students (plus 1,029 students) between 2015 and 2021, although enrollment at Capuchino High decreased by four students during the same period. While the 2,704 units within the SMUHSD service area would increase enrollment by 143 students, Capuchino High has recently supported as many as 1,225 students (an additional 102 students in comparison with current enrollment) during the 2019-2020 school year. The additional 41 students added by the project to the Capuchino High in comparison with peak enrollment during the 2019-2020 school year is not anticipated to cause enrollment to exceed capacity. Further, the school impact fees paid during the buildout period would go towards installing portable buildings or completing any physical improvements necessary to accommodate the additional students. The SMUHSD could also consider adjustment of attendance boundaries to better allocate students to available school capacities. Consistent with Government Code Sections 65995 through 65998 (refer to Section 4.15.1.1 Regulatory Framework), payment of development impact fees by future development would ensure that buildout of the Housing Element Update would provide funding to help offset increased student populations that would require new or expanded school facilities.

Impact PS-4:	The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for parks. (Less than Significant Impact)
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Unlike fire and police stations and schools, parks do not have established service areas, since they can be used by anyone, including non-residents. Accordingly, the analysis of the Housing Element Update below examines the cumulative impact of buildout of all Housing Opportunity Sites on parks throughout the City.

¹³³ Single family detached rate: 0.113; multi-family rate: 0.073.

¹³⁴ Single family residential rate: 0.1; multi-family rate: 0.05.

As discussed in Section 4.14.2 under Impact POP-1, buildout of the Housing Opportunity Sites would result in the construction of an additional 3,618 housing units. Using the City's average number of residents per household (2.64), construction of 3,618 housing units would increase the City's population by an additional 9,552 residents in comparison with existing conditions.

The City maintains a parkland standard of 4.5 acres per 1,000 residents. The existing park acreage in the City is 199 acres, which based on the existing population of 42,656 residents, equates to 4.66 acres per 1,000 residents.¹³⁵ Implementation of the Housing Element would increase the City's population to 52,208 residents through the year 2031, which would equate to 3.81 parkland acres per 1,000 residents.¹³⁶ Consistent with Section 12.260 of the San Bruno Municipal Code (refer to Section 4.15.1.1), future residential development would be required to pay development impact fees. These fees would fund a portion of the anticipated new park and recreation infrastructure and capital facilities needed to accommodate growth and maintain performance standards. The fees paid by future developers would be used by the City to acquire and/or improve new park and recreation infrastructure and capital facilities. New facilities would be subject to their own project-level CEQA review.

For the reasons stated above, implementation of the Housing Element Update would not result in substantial adverse physical environmental impacts associated with the provision of new or physically altered park facilities in order to maintain acceptable service ratios, response times, or other performance objectives.

Impact PS-5:	The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for other public facilities. (Less than Significant Impact)
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As noted in the City's Development Impact Fee Nexus Study (refer to Section 4.15.1.1), the City has identified the need to provide new libraries and recreation facilities or physically alter existing library and recreation facilities, based on the relative share of service population growth attributable to new residents and employees. Implementation of the Housing Element Update would cause demand for public facilities to increase. Future residential development under the Housing Element would be required to pay development impact fees, which would partially fund new or physically altered facilities needed to accommodate growth and maintain performance standards. The fees paid by future developers would be used by the City to acquire and/or improve new public facilities. New facilities would be subject to their own project-level CEQA review.

For the reasons stated above, implementation of the Housing Element Update not result in substantial adverse physical environmental impacts associated with the provision of new or physically altered public facilities in order to maintain acceptable service ratios, response times, or other performance objectives.

¹³⁵ 42,656 divided by 1,000 equals 42.656; 200 acres divided by 42.656 equals 4.688.

¹³⁶ 52,208 divided by 1,000 equals 52.208; 199 acres divided by 52.208 equals 3.811.

4.16

RECREATION

4.16.1

Environmental Setting

4.16.1.1

Regulatory Framework

State

Government Code Section 66477

The Quimby Act (included within Government Code Section 66477) requires local governments to set aside parkland and open space for recreational purposes. It provides provisions for the dedication of parkland and/or payment of fees in lieu of parkland dedication to help mitigate the impacts from new residential developments. The Quimby Act authorizes local governments to establish ordinances requiring developers of new residential subdivisions to dedicate parks, pay a fee in lieu of parkland dedication, or perform a combination of the two.

Regional and Local

County of San Mateo Trails Master Plan

Adopted in 2001, the County of San Mateo Trails Master Plan is intended to, among other objectives, provide policies and guidelines for trails planning and to define environmental issues and mitigation measures for trail management.

City of San Bruno General Plan

Various policies in the City’s General Plan have been adopted for the purpose of avoiding or mitigating recreational impacts resulting from planned development within the City including the following:

Policies	Description
LUD-76	Assure that new development mitigates impacts on existing public services, including transit services, water, sewer, and storm drainage systems, police and fire protection, libraries, and parks and recreation facilities.
OSR-1	Maintain a parkland dedication/in lieu fee standard of 4.5 acres/1,000 residents.
OSR-2	Amend the City’s Zoning Ordinance to ensure that all developments are subject to dedication/in lieu fee requirements, whether or not such developments result from subdivision.
OSR-3	Revise the City’s Park In-Lieu Fee to create an option (at the City’s discretion) to accept either Park In-Lieu Fees or require the developer to design/build parks and/or recreation facilities as part of the development.
OSR-4	Undertake a program to add 20 acres of parkland to the City system over the next 20 years. Seize all opportunities to develop and/or maintain parks and recreation facilities within existing residential neighborhoods through acquisition or preservation of former school facilities.

Policies	Description
OSR-5	Strive to locate neighborhoods park facilities within 1/3-mile walking distance of all residences in San Bruno. If limited in some neighborhoods, coordinate with local school districts to allow use of playgrounds and sports facilities after school hours.
OSR-6	Provide small public parks and/or plazas within BART and Caltrain station areas, within Downtown, and along El Camino Real. Provide benches, water fountains, and trees to serve as resting areas for pedestrians, commuters, and shoppers.
OSR-7	As former Skyline College properties are developed for single-family residential neighborhoods, create an option (at the City's discretion) for development of parks and/or recreation facilities to serve San Bruno residents.
OSR-9	Actively implement the City's Comprehensive Parks and Recreational Facilities Master Plan, which more fully identifies park and recreation needs and deficiencies.
OSR-10	Continue coordination with San Bruno Park School District (per the Five-Year Joint Use Agreement, 2002) to allow joint use of school facilities for after-school programs, sports leagues, and non-organized play.
OSR-12	Study potential locations and funding mechanisms for the development of a Teen Recreation Center that provides the types of programs and activities to successfully attract the City's teens.
OSR-13	Design and construct non-traditional recreation facilities (skateboarding/BMX bike park, rock climbing wall, etc) to provide alternative forms of recreation for the City's teens. Coordinate this facility with the Parks and Recreation Commission.
OSR-14	Continue to support and expand adult (50+) programs and activities offered at the Senior Center. Develop plans to expand the facility as needed to accommodate the City's senior population.
OSR-15	Study potential sites and funding mechanisms for relocation of the San Bruno Swim Center, or development of a new multi-programmed Aquatics Facility.
PFS-3	Require, as part of plan review, identification of needed public service improvement and maintenance costs for those projects that may have a significant impact on existing services.
PFS-5	Develop a Civic Center Complex Master Plan, in order to coordinate rehabilitation and expansion of the various City departments and service providers.

City of San Bruno Municipal Code

Pursuant to Section 12.260 of the City's Municipal Code, the City assesses fees upon development projects to fully or partially offset the costs of public facilities and infrastructure that is needed to serve new demand created by development projects. As established by Municipal Code Section 12.44, the City maintains a parkland dedication/in-lieu fees standard of 4.5 acres per 1,000 residents. Effective July 1, 2022, the development impact fee is \$29,494.53 per single-family residential unit and \$27,083.16 per multi-family residential unit.¹³⁷

¹³⁷ City of San Bruno. *FY2022-23 Master Fee Schedule*. July 2022.

City of San Bruno Development Impact Fees Nexus Study

The City of San Bruno prepared the San Bruno Development Impact Fee Nexus Study designed to provide the City of San Bruno with the necessary technical documentation in order to adopt a comprehensive development impact fee program. As discussed in the nexus study, development impact fees are one-time charges on new development projects that are collected and used by jurisdictions to cover the cost of capital facilities and infrastructure needed to serve the new residential and development growth. Impact fees are regulated by Government Code Sections 66000-66025. The purpose of the nexus study is to determine the maximum allowable fees that the City can charge for facilities and infrastructure consistent with the legal requirements of AB 1600. Fees collected under AB 1600 are to be collected for capital facility and infrastructure improvements only, used to fund facility needs created by new development rather than existing deficiencies, and the fees are to be based on a rational nexus between new development and the costs of the capital facilities and infrastructure needed to accommodate such development.

4.16.1.2 Existing Conditions

San Bruno currently provides its residents with a total of 72 acres of City parkland. There are five small pocket parks, 12 neighborhood parks, and one large community park. The Parks and Recreation Services Department maintains all developed municipal park sites, four school sites, street medians, and landscaping along San Mateo Avenue and at other City facilities. Hiking and cycling trails are located west of the city boundary within the Golden Gate National Recreation Area and the San Francisco Peninsula Watershed, accessible from Sneath Lane and San Bruno Avenue. San Bruno City Park, Grundy Park, and Lion’s Field are the City’s most utilized parks.

In addition to city parks, local recreation centers, school facilities, and a 108-acre regional park—San Mateo County’s Junipero Serra Park—provide recreational opportunities for San Bruno residents. There are four different recreation centers in San Bruno: the Belle Air Community Center, the Veterans Memorial Recreation Center, the San Bruno Senior Center, and the Portola Performing Arts Center.

4.16.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
1) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Impact REC-1: The project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. **(Less than Significant Impact)**

As discussed in Section 4.14.2 under Impact POP-1, buildout of the Housing Opportunity Sites, along with 669 pipeline units that have been entitled and 240 ADUs, would result in the construction of an additional 3,618 housing units. Using the City's average number of residents per household (2.64), construction of 3,618 housing units would increase the City's population by an additional 9,552 residents in comparison with existing conditions.

Implementation of the Housing Element Update and the associated increase in population is anticipated to increase the use of parks and other recreational facilities. As discussed in Section 4.15 under Impact PS-4, buildout of the Housing Element Update would not result in substantial adverse physical environmental impacts associated with the provision of new or physically altered park facilities in order to maintain performance objectives. Therefore, the project would not increase the use of neighborhood or regional parks such that substantial physical deterioration of the facility would occur or be accelerated. Further, consistent with Section 12.260 of the San Bruno Municipal Code (refer to Section 4.15.1.1), future residential development would be required to pay development impact fees. These fees would fund a portion of the anticipated new recreation infrastructure and capital facilities needed to accommodate growth and maintain facilities. The fees paid by future developers would be used by the City to acquire and/or improve recreation infrastructure and capital facilities.

For the reasons stated above, implementation of the Housing Element Update would not increase the use of recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

Impact REC-2: The project does not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. **(Less than Significant Impact)**

It is reasonably foreseeable that future development under the Housing Element Update may include on-site open space and other recreational facilities, or require the construction or expansion of recreational facilities. As noted elsewhere in this Initial Study, new or expanded facilities would be subject to their own project-level CEQA review, and recreational facilities are low-impact land uses that do not typically result in substantial environmental impacts. Further, the EIRs prepared for the General Plan, TCP, and Bayhill Specific Plan concluded that with adherence to the General Plan policies identified in Section 4.16.1.1 and payment of development impact fees, construction or expansion of recreational facilities would have less than significant environmental impacts. Development of the Housing Opportunity Sites would be subject to General Plan policies identified in Section 4.16.1.1 and required to pay their fair share of development impact fees. For these reasons, new or expanded recreational facilities constructed as a result of the Housing Element Update would not have an adverse physical effect on the environment.

4.17 TRANSPORTATION

The following discussion is based, in part, on an VMT Analysis prepared for the Housing Element Update by Hexagon Transportation Consultants, Inc. A copy of this report, dated May 2022, is attached to this Initial Study as Appendix C.

4.17.1 Environmental Setting

4.17.1.1 *Regulatory Framework*

State

Senate Bill 743

SB 743 establishes criteria for determining the significance of transportation impacts using a vehicle miles traveled (VMT) metric intended to promote the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses. Specifically, SB 743 requires analysis of VMT in determining the significance of transportation impacts. Local jurisdictions were required by Governor's Office of Planning and Research (OPR) to implement a VMT policy by July 1, 2020.

SB 743 did not authorize OPR to set specific VMT impact thresholds, but it did direct OPR to develop guidelines for jurisdictions to utilize. CEQA Guidelines Section 15064.3(b)(1) describes factors that might indicate whether a development project's VMT may be significant. Notably, projects located within 0.50 mile of transit should be considered to have a less than significant transportation impact based on OPR guidance.

Regional

Regional Transportation Plan

MTC is the transportation planning, coordinating, and financing agency for the nine-county San Francisco Bay Area, including Contra Costa County. MTC is charged with regularly updating the Regional Transportation Plan, a comprehensive blueprint for the development of mass transit, highway, airport, seaport, railroad, bicycle, and pedestrian facilities in the region. MTC and ABAG adopted Plan Bay Area 2050 in October 2021, which includes a Regional Transportation Plan to guide regional transportation investment for revenues from federal, state, regional and local sources through 2050.

City/County Association of Governments

C/CAG works on issues that affect the quality of life in general: transportation, air quality, stormwater runoff, airport/land use compatibility planning, hazardous waste, solid waste and recycling. C/CAG, as the Congestion Management Agency for San Mateo County, is required to prepare and adopt a Congestion Management Program (CMP) on a biennial basis. The purpose of the CMP is to identify strategies to respond to future transportation needs, develop procedures to alleviate and control congestion, and promote countywide solutions. The CMP is required to be consistent with the MTC planning process that includes regional goals, policies, and projects for the

Regional Transportation Improvement Program.¹³⁸ Projects are required to submit a Transportation Demand Management (TDM) plan in compliance with the CMP guidelines if the project will generate 100 net new average daily trips (ADT) to the CMP roadway network.

Local

City of San Bruno General Plan

Various policies in the City’s General Plan have been adopted for the purpose of avoiding or mitigating transportation impacts resulting from planned development within the City including the following:

Policies	Description
HS-17	Synchronize traffic signals between El Camino Real, Sneath Lane, Huntington Avenue, and San Bruno Avenue, to improve traffic flows into and out of the San Bruno BART Station.
HS-18	Require right-of-way landscaping to be maintained at an appropriate scale, so as to not reduce visibility at intersections.
HS-19	Should Caltrans vacate El Camino Real as a State highway, reconfigure the roadway to include wide sidewalks, streetscaping, and marked bicycle lanes. Consider various alternative configurations of traffic flow.
LUD-9	Provide safe and comfortable pedestrian routes through residential areas by requiring sidewalks on both sides of streets, planting street trees adjacent to the curb, allowing on-street parking, and minimizing curb cuts.
LUD-76	Assure that new development mitigates impacts on existing public services, including transit services, water, sewer, and storm drainage systems, police and fire protection, libraries, and parks and recreation facilities.
T-A	Provide for efficient, safe, and pleasant movement for all transportation modes—vehicles, bicycles, transit, and pedestrians.
T-B	Maintain acceptable levels of service for vehicular movement along the city’s street network. Acceptable level of service could vary based on characteristics of the area under consideration.
T-D	Provide adequate parking facilities for commercial, industrial, and transit station areas.
T-E	Focus San Bruno’s efforts on improvements to the non-motorized transportation system (i.e., bicycles, pedestrians, strollers, etc.) adjacent to transit corridors and stations, and their connections to those systems.
T-F	Provide efficient local transit—such as a shuttle system—to the BART and Caltrain stations to avoid dependence on individual motor vehicles.
T-G	Protect residential areas from congestion and associated noise resulting from BART and Caltrain spillover traffic.

¹³⁸ City/County Association of Governments of San Mateo County. “San Mateo County Congestion Management Program 2019”. Accessed October 24, 2022. <https://ccag.ca.gov/programs/transportation-programs/congestion-management/>.

Policies	Description
T-H	Provide efficient local transit—such as a shuttle system—to the BART and Caltrain stations to avoid dependence on individual motor vehicles.
T-I	Develop and maintain a comprehensive bicycle network within San Bruno, providing connections to BART and Caltrain, surrounding cities, employment and shopping areas, and natural areas.
T-J	Develop a safe, convenient, and continuous network of sidewalks and pedestrian paths within the city.
T-2	Ensure that all transportation improvements—roadway, transit, bicycle, and pedestrian—are designed and constructed according to Americans with Disabilities Act standards. Improve existing facilities so they are compliant with American Disability Act standards.
T-3	Encourage provision of bicycle facilities such as weather protected bicycle parking, direct and safe access for pedestrians and bicyclists to adjacent bicycle routes and transit stations, showers and lockers for employees at the worksite, secure short-term parking for bicycles, etc.
T-6	Maintain LOS standards for intersections for AM and PM peak periods as shown in Figure 4-2.
T-7	Undertake improvements to intersections shown T-7 in Table 4-8 and in Figure 4-7 to ensure their operation at the LOS shown in Figure 4-2. Determine costs for these improvements and establish an impact fee program to assess improvement costs to new development, proportionate to the impacts created by such development.
T-8	Support widening of Skyline Boulevard between Sneath Lane and I-280 to alleviate traffic congestion problems, if concerns regarding sensitive natural resources can be mitigated. Preserve the mature trees in the area, if feasible.
T-10	Improve signage and access at the intersection of San Mateo Avenue, Taylor Avenue, and El Camino Real.
T-14	Use traffic-calming measures to reduce speeding in residential areas, rather than limiting through-street connections. Traffic-calming measures may include: <ul style="list-style-type: none"> • Narrowing travel lanes and allowing on-street parking; • Using different paving materials at pedestrian crosswalks; • Planting street trees and other vegetation; • Building corner bulb-outs and intersection roundabouts; • Installing stop and/or yield signage; and • Speed limit enforcement or other mitigation measures.
T-17	Synchronize traffic signals between El Camino Real, Sneath Lane, Huntington Avenue, and San Bruno Avenue, to improve traffic flows into and out of the San Bruno/Tanforan BART Station.
T-21	Consider investment in Intelligent Transportation System (ITS) to enhance efficiency of existing network, potential ITS strategies includes: <ul style="list-style-type: none"> • Roadway monitoring system (cameras, centralized traffic control center) • Enhance travel information (variable message signs at major intersections) • Incidence Response Plan

Policies	Description
	<ul style="list-style-type: none"> Adaptive Traffic Signal Timing along major arterials
T-22	Apply turning restrictions to major arterials during peak hours to improve general traffic flow.
T-23	Implement Parking Guidance System to guide motorists to parking locations in commercial areas.
T-24	Implement targeted reinforcement program to eliminate double parking in downtown and along San Bruno Ave and El Camino Real.
T-34	Comprehensively review and revise parking standards for new office and commercial development providing alternative transportation measures (i.e., vanpool, shuttle service, bicycle storage).
T-35	Conduct a parking study to determine potential deficiencies at parks and public facilities. Recommend parking solutions.
T-36	Enforce on-street and off-street parking restrictions, particularly of motor homes, trailers, boats, and non-operating vehicles, and in residential areas near major transit facilities.
T-37	Require provisions and marking of handicapped parking spaces in conformance with California Vehicle Code to allow enforcement by public agencies or private interests.
T-38	Study the possibility of providing public parking facilities for commercial and industrial areas. Designate general areas where parking lots are needed; purchase site(s) if possible when land uses change to avoid displacement of occupants. Consider the use of assessment districts to fund land acquisition.
T-39	Encourage parking lot access from non-residential side streets in order to minimize interruption to traffic flow on primary streets (San Bruno Avenue east of El Camino Real and along El Camino Real).
T-40	Consider reduced parking standards within transit corridors and station areas in recognition of their proximity to high frequency transit service, mix of land uses, and walkable environment.
T-41	Allow joint use of parking facilities when nearby uses have staggered peak periods of demand.
T-42	Do not allow parking lots to dominate the frontage of mixed-use streets, interrupt pedestrian routes, or negatively impact surrounding neighborhoods.
T-43	Create a “pedestrian-friendly” environment surrounding the BART and Caltrain stations by installing additional street trees, lighting, signage, and widening sidewalks along streets adjacent to these stations.
T-44	Support the Caltrain Grade Separation Project, featuring relocation of the Caltrain station above grade at the San Mateo Avenue/San Bruno Avenue intersection. Provide main parking facilities for the Caltrain station on the former San Bruno Lumber site north of the intersection, and bicycle and pedestrian connections to surrounding areas with prominence given to access south to Downtown.
T-45	During the Caltrain Grade Separation Project, ensure that the San Bruno station serves as an important gateway and northern anchor to Downtown, which should be clearly visible from the station platform.

Policies	Description
T-46	As rail capacity increases with expanded BART and Caltrain service, install pedestrian safety measures—such as clear markings, safety gates, alternative routes, or overcrossings—at all at-grade railway crossings in the city. At grade-separated locations, provide safe pedestrian under-crossings.
T-47	Improve multi-modal access—specifically for pedestrians, cyclists, and transit passengers—to the BART and Caltrain stations through improvements along Huntington Avenue.
T-48	Incorporate a dedicated pedestrian crossing and flashing street markers at the new four-way signal installed on El Camino Real connecting The Crossing with The Shops at Tanforan and the San Bruno BART station.
T-49	Install adequate turning, driveway, and drop-off lanes at the San Bruno BART and planned San Bruno Avenue Caltrain stations to accommodate the increased levels of traffic expected.
T-50	Consider developing a shuttle service to provide reliable, consistent, and convenient access between the BART and Caltrain stations and other destinations within the city, including Bayhill Office Park, Skyline College, Downtown, schools and neighborhoods in the western and southern portions of the city.
T-51	Publicize all routes that provide non-auto access to the BART and Caltrain station areas, such as the GAP Inc. shuttle, bicycle routes, etc.
T-52	Work with BART and Caltrain to provide park and ride facilities with convenient, safe pedestrian access to the transit stations.
T-53	Coordinate with the Peninsula Corridor Joint Powers Board to ensure design of the planned San Bruno Avenue Caltrain Station (and Grade Separation Project) that will accommodate such regional transit improvements.
T-55	Consider developing a parking permit system in residential areas adjacent to the new Caltrain Station to prevent overflow parking, when requested by a designated majority of residents in that area.
T-57	Work with SamTrans to schedule the routing of public transit in San Bruno so that a majority of residents are within walking distance of transit stops.
T-58	Work with SamTrans to design the local bus transit system for maximum passenger satisfaction, safety, comfort, convenience, and privacy.
T-59	Encourage SamTrans to configure bus transit service to serve connections with other transit systems (BART, Caltrain, SFO Airport, and other bus lines).
T-65	Work with SamTrans to locate transit stops directly adjacent to buildings with retail frontage, rather than severed by large parking lots.
T-66	Design arterial and collector streets to facilitate safe pedestrian crossings to transit stops. Provide crosswalks at all signalized arterial intersections.
T-67	Encourage installation of bus shelters, appropriate for year-round weather, to provide comfortable, safe waiting areas for SamTrans riders.
T-69	Continue to work toward dedication and/or installation of bicycle lanes throughout the city in accordance with [General Plan] Figure 4-4, to enhance recreational opportunities and make bicycling a more viable transportation alternative. Implement bicycle route improvements

Policies	Description
	including signing, striping, paving, and provision of bicycle facilities at employment sites, shopping centers, schools, and public facilities.
T-70	Identify funding for and implement as a priority bicycle/pedestrian paths along the BART and Caltrain track alignments (Huntington Avenue and Herman Avenue) within the city limits. Coordinate with the Linear Park planned in South San Francisco and Millbrae.
T-71	Provide bicycle parking facilities in Downtown, Bayhill Office Park, BART and Caltrain Stations, The Shops at Tanforan and Towne Center, parks, schools, and other key destinations. Review bicycle standards as part of the Zoning Ordinance Update.
T-72	Identify and mark safe bicycle routes providing connections between the BART and Caltrain stations, and the following regional trail networks: <ul style="list-style-type: none"> • Bay Area Ridge Trail, • Sweeney Ridge Trail, • Bay Trail, • San Andreas Trail, and • Sawyer Camp Trail.
T-74	Ensure maintenance of vegetation along bicycle routes within the city. Ensure that overgrown vegetation does not push bicyclists into vehicular travel lanes and cause potential accidents.
T-75	Link sidewalks directly to building entrances. Avoid routes through parking lots or at the rear of residential developments.
T-76	Require construction of sidewalks at least five (5) feet wide along newly built streets within San Bruno, and four (4) feet wide on older streets to preserve street character in older neighborhoods.
T-77	Create a pedestrian-oriented setting along the Pedestrian Emphasis Zones (see [General Plan] Figure 4-6) through potential construction of the following public improvements: <ul style="list-style-type: none"> • Brick pavers to make sidewalks look more distinct • Street trees to soften the environment and provide color and shade; • Human-scale street lights for enhanced aesthetics and illumination; • Banners and flags to make the area look more festive and cheerful; and • Benches to give people a place to sit, rest, and watch what goes on around them.
T-78	Allow new development to contribute to the Pedestrian Emphasis Zones (Figure 4-6) through construction of off-site improvements.
T-80	Install safety improvements for pedestrian crossings along El Camino Real. Such improvements may include bulb-outs at the corners, crossing medians, and signal synchronization.
T-81	Provide for public safety and efficient operation in the planning, construction, and maintenance of transportation facilities.

City of San Bruno Transportation Element

The transportation element of the San Bruno General Plan describes San Bruno's existing transportation network, including roadway and highway system, scenic corridors, transit systems, and pedestrian and bicycle facilities, and provides policies that address all modes of transportation, as

well as the interrelationship between the modes. Circulation and traffic within the City specifically are analyzed by examining roadway and intersection operations in terms of “level of service” (LOS), which is a measure of driving conditions and vehicle delay. Levels of service range from A (best) to F (poorest). LOS A, B and C indicate conditions where traffic can move relatively freely. LOS D describes conditions where delay is more noticeable. LOS E indicates conditions where traffic volumes are at or close to capacity, resulting in significant delays and average travel speeds that are one-third the uncongested speeds or lower. LOS F characterizes conditions where traffic demand exceeds available capacity, with very slow speeds (stop-and-go), long delays (over a minute) and queuing at signalized intersections.

City of San Bruno Walk ‘N Bike Plan

The City of San Bruno Walk ‘N Bike Plan was adopted July 26, 2016. The plan presents the desired state of walking and biking in San Bruno 10 years out that would result from implementation of the Walk ‘N Bike Plan. Chapters Five through Eight of the Walk ‘N Bike Plan identify specific infrastructure projects and program action items that would implement the City’s vision.

City of San Bruno Development Impact Fees Nexus Study

The City of San Bruno prepared the San Bruno Development Impact Fee Nexus Study designed to provide the City of San Bruno with the necessary technical documentation in order to adopt a comprehensive development impact fee program. As discussed in the nexus study, development impact fees are one-time charges on new development projects that are collected and used by jurisdictions to cover the cost of capital facilities and infrastructure needed to serve the new residential and development growth. Impact fees are regulated by Assembly Bill (AB) 1600 (Government Code Section 66000 et seq.). The purpose of the nexus study is to determine the maximum allowable fees that the City can charge for facilities and infrastructure consistent with the legal requirements of AB 1600. Fees collected under AB 1600 are to be collected for capital facility and infrastructure improvements only, used to fund facility needs created by new development rather than existing deficiencies, and the fees are to be based on a rational nexus between new development and the costs of the capital facilities and infrastructure needed to accommodate such development.

Transit Corridors Plan

As noted in Section 3.1.1.1, Housing Opportunity Sites 1, 2, 4, 5, 7, 9, 11, 12, 15, 17, 20, 21, 22, and 23 are located within the TCP area. The TCP includes development standards and design guidelines that govern future private development actions in the TCP area, including the following which pertain to the circulation system.

Policies	Description
TRANS-A	Promote the development of the Transit Corridors Area’s street and intersection network that supports the proposed intensification of land uses, while providing mobility for all travel modes.
TRANS-B	Ensure increased transit connectivity within and to/from the Transit Corridors Area and provide for transit amenities at stops and stations that increase the visibility of stops/stations and improve the comfort and convenience for transit riders.

Policies	Description
TRANS-C	Encourage improved bicycle connectivity and enhanced bicycle parking opportunities within the Transit Corridors Area linking the surrounding land uses and future Caltrain station.
TRANS-D	Facilitate pedestrian access and safety through pedestrian enhancements, including the provision of enhanced crosswalks at all intersections and wider sidewalks and pedestrian amenities along the transit corridors.
TRANS-E	Develop and implement a parking management strategy for the Plan area that makes efficient use of the City's parking supply through shared parking strategies and that provides the lowest number of parking spaces, while still maintaining the viability of the Plan through efficient use of the parking supply within the Plan Area.
TRANS-F	Develop and implement a TDM Program that reduces the amount of peak-period motor vehicle traffic and encourages the use of modes other than the single-occupant vehicle.

Bayhill Specific Plan

As noted in Section 3.1.1.1, Housing Opportunity Sites 3 and 13 are located within the Bayhill Specific Plan area. Chapter Four of the Bayhill Specific Plan includes mandatory transportation policies, including the following which were identified in the Bayhill Specific Plan EIR.

Policy 4-5

Policy 4-5 encourages TDM programs to support high-frequency, reliable, all-day shuttle to BART and Caltrain stations and Downtown San Bruno, and requires the preparation of a first/last mile study for travel between the Bayhill Specific Plan area and the BART and Caltrain stations that includes a study of bicycle connections.

Policy 4-6

Policy 4-6 requires the City and property owners in the Bayhill Specific Plan area to enhance existing transit stop infrastructure concurrent with redevelopment of properties whose street frontage include transit stops.

Policy 4-12

Policy 4-12 requires all new developments to submit a Construction Management Plan (CMP) prior to issuance of a demolition, grading, or building permit, and ongoing throughout demolition, grading and/or construction. The CMP is intended to outline traffic management strategies to reduce, to the extent feasible, traffic congestion, closures on the transportation network including emergency access and emergency response vehicles, the effects of parking demand by construction workers, and other nearby projects that could be simultaneously under construction.

Policy 4-13

Policy 4-13 requires all contractors to ensure that any pedestrian, bicycle, or transit facility closed or obstructed by construction activity be replaced with a convenient and accessible alternative that replicates as nearly as practicable the most desirable characteristics of the original facility.

4.17.1.2 *Existing Conditions*

Transit Services

BART, the Caltrain, and the San Mateo County Transit District (SamTrans) currently provide transit service in San Bruno. The transit services provided by these three systems are described below.

BART

BART is a 131-mile, automated rapid transit system serving over four million people in the counties of Alameda, Contra Costa, Santa Clara, San Francisco, and San Mateo. Fifty BART stations are located along five lines of double track system wide. Trains traveling up to 75 miles per hour connect San Francisco to Millbrae and to other East Bay communities – north to Richmond, east to Antioch, east to Dublin/Pleasanton, and south to Berryessa/North San José. BART’s current weekday ridership is approximately 440,000. BART trains operate from five a.m. to midnight Monday through Friday, six a.m. to midnight on Saturday, and eight a.m. to midnight on Sunday.¹³⁹

Service is provided by BART at the San Bruno BART Station, located at 1151 Huntington Avenue, adjacent to Housing Opportunity Site 14. The San Bruno BART Station is served by the Antioch-SFIA/Millbrae and Richmond-Millbrae/SFIA lines, which operate on weekdays with headways ranging from 15 to 30 minutes, on Saturdays with headways ranging from 14 to 30 minutes, and on Sundays and holidays with headways of 30 minutes.¹⁴⁰ San Bruno averages 1,317 passengers on and 1,394 passengers off on weekdays, 828 passengers on and 939 passengers off on Saturdays, and 532 passengers on and 624 passengers off on Sundays and holidays. Total monthly passengers entering at the San Bruno BART Station per the latest ridership report amounts to 34,415 passengers.¹⁴¹

Caltrain¹⁴²

Caltrain is a fixed guideway commuter rail system serving San Francisco, San Mateo and Santa Clara counties that spans 77.3 miles and includes 32 stations — 29 of which are weekday service, 24 which are weekend service (including two weekend-only stations), and one special event service station which serves Stanford Stadium.

Service is provided by Caltrain at the San Bruno Caltrain Station located at 833 San Mateo Avenue. In 2019, daily mid-weekday ridership (when ridership levels are highest) averaged 317 northbound passengers on and 376 northbound passengers off, respectively, and 434 southbound passengers on and 337 southbound passengers off, respectively. San Bruno ranks 19th in average mid-weekday ridership at 751 total passengers on and 713 passengers off.

SamTrans¹⁴³

SamTrans is the primary regional and local bus transit provider within San Mateo County, serving all rail stations within the County and major transit transfer points for Santa Clara and San Francisco

¹³⁹ Bay Area Rapid Transit. “System Facts”. Accessed October 13, 2022. <https://www.bart.gov/about/history/facts>

¹⁴⁰ Bay Area Rapid Transit. “San Bruno Station”. Accessed October 13, 2022. <https://www.bart.gov/stations/sbrn>

¹⁴¹ Bay Area Rapid Transit. *2022 Monthly Ridership Reports*. September 2022.

¹⁴² Caltrain. *Caltrain 2019 Annual Passenger Count Key Findings*. 2019.

¹⁴³ City of San Bruno. *Walk ‘N Bike Plan*. July 2016.

counties. SamTrans operates 76 bus routes throughout San Mateo County and into parts of San Francisco and Palo Alto. San Bruno is served by the following SamTrans routes.

Route 141

Route 141 runs between South San Francisco to San Bruno with service to San Bruno BART. Key destinations include The Shops at Tanforan. Route 141 has five different variants that provide limited service to Belle Air School, Parkside School, San Bruno Senior Center, and Peninsula High School. Weekday service operates every 30-minutes between 6:30 a.m. and 7:30 p.m. On weekends, service operates between 7:15 to 6:45 with 30-60-minute headways.

Route 142

Route 142 runs between SFO and the San Bruno Senior Center, with stops at the San Bruno BART Station and Shelter Creek. Route 142 has four different variants. Service is provided on one hour headways, between 6:00 a.m. and 7:00 p.m. on weekdays and between 7:00 a.m. and 7:00 p.m. on weekends.

Route ECR

The ECR is 27-mile long route that connects Daly City BART with Palo Alto Transit Center via El Camino Real. It travels through multiple jurisdictions, including Daly City, Colma, South San Francisco, San Bruno, Burlingame, San Mateo, San Carlos, Redwood City, and Palo Alto. The ECR parallels BART service between Daly City and Millbrae and serves every station in between. The ECR also parallels the Caltrain corridor between Millbrae and Palo Alto, and has stops within a quarter-mile of every station in between. The route has frequent service between 4:05 a.m. and 12:35 a.m. with approximately 20-minute service on weekdays and 30-minute weekend service. Night owl service is provided every 60-minutes between San Francisco International Airport and Daly City.

Route EPX

Route EPX is a limited-stop route connecting East Palo Alto and Redwood City to San Francisco International Airport. Some trips terminate in the northern end at the San Bruno BART Station, while limited service is provided on this route to downtown San Francisco. Route EPX operates during weekday peak hours (5:00 a.m. to 9:30 a.m., 2:30 p.m. to 7:30 p.m.) on 60 minute headways.

Roadway Network

The roadway network in San Bruno consists of freeways, arterials, major collectors, minor collectors, and local streets. Freeways are “controlled-access” thoroughfares, meaning that only high-speed motor-vehicle traffic is allowed on them. Freeways within or adjacent to the City include:

- I-280 (Interstate 280), which bisects the City in a north–south direction.
- I-380 (Interstate 380), a short east–west freeway spur, connecting I-280 to U.S. Highway 101 near San Francisco International Airport.
- U.S. Highway 101, which runs alongside the east side of San Bruno, just beyond the City border, in a north–south direction.

Arterials are medium-speed, medium-volume roads that generally connect to freeways and to other arterials. San Bruno has fewer than ten streets designated as arterials (according to the San Bruno General Plan) yet they form the backbone of the City's circulation system. They generally have two to four traffic lanes and speeds between 25 and 40 miles per hour. Collectors are lower-speed, lower-volume streets than arterials; they generally serve shorter trips and are generally intended for collecting cars from local streets and distributing them to the arterial network.

The arterials and major collectors that run in a generally north–south direction are (listed from east to west):

- San Mateo Avenue north of Huntington Avenue;
- Huntington Avenue north of San Mateo Avenue;
- El Camino Real (designated as State Route 82).
- Cherry Avenue between Sneath Lane and San Bruno Avenue West.
- Skyline Boulevard (State Route 35).

The arterials and major collectors that run in a generally east–west direction are (listed from north to south):

- Sneath Lane east of Skyline Boulevard;
- San Bruno Avenue;
- Jenevein Avenue;
- Crystal Springs Road to I-280, including a short segment of Cunningham Way.

Minor collectors in San Bruno include San Felipe Avenue, Angus Avenue, Kains Avenue, Cherry Avenue south of San Bruno Avenue, Crestmoor Drive, Fleetwood Drive and College Drive. The rest of the street network is made up of local streets, which are low-speed, low-volume, neighborhood-serving streets whose main purpose is to provide access to fronting properties.

Bicycle Facilities

Bicyclists may use any non-freeway street in San Bruno, which has few dedicated bicycle facilities. Bike lanes exist on portions of only a few streets, including Sneath Lane, Commodore Drive and Sharp Park Road; in addition, San Bruno Avenue west of I-280 has a wide shoulder that functions like a bike lane, even though it does not have bike-lane stencils or signage. There are no formal off-street bike paths within San Bruno.

Sparse bicycle parking is available at City facilities or in the public right-of-way, and the City does not have an ordinance requiring bicycle parking in private developments. There is bicycle parking in the form of both racks and lockers at the City's BART and Caltrain stations. Traffic signals in San Bruno do not have bicycle-detection technology.

Pedestrian Facilities

The main facilities for pedestrians in San Bruno consist of sidewalks and crosswalks and, to a lesser extent, off-street footpaths. San Bruno has an extensive system of sidewalks, marked crosswalks and pedestrian crossing signals, particularly on the arterials and collectors and at main intersections. Many of the residential streets also have sidewalks, at least on one side, and marked crosswalks, especially at crossings with major streets. In addition, in recent years, the City has been installing curb ramps at key locations to improve access for persons with disabilities. Off-street footpaths are found in San Bruno City Park and Junipero Serra County Park.

4.17.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
1) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle lanes, and pedestrian facilities?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4) Result in inadequate emergency access?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact TRN-1: The project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle lanes, and pedestrian facilities. **(Less than Significant Impact with Mitigation Incorporated)**

Transit Services

Construction-related activities would typically occur Monday through Friday, with limited construction activities outside of daytime hours or on weekends. The number of construction workers at this time is not reasonably foreseeable, but it is anticipated that only a small proportion of these workers would be expected to arrive by public transit given the equipment demands and shift hours, which are offset from peak transit service, typical of construction work. Any construction workers who travel to the Housing Opportunity Sites using public transit would likely do so during off-peak hours when transit has ample capacity to accommodate the additional load. For these reasons, construction-related transit capacity impacts associated with the Housing Element Update would be less than significant.

Future development under the Housing Element Update would be required to adhere with the General Plan policies adopted to avoid or reduce impacts to transit services (refer to Section 4.17.1.1), including those requiring the City and future developments to coordinate with BART, Caltrain, and SamTrans and enhance, construct, or fund improvements to transit stops. As discussed below, implementation of MM TRN-1.1 would require preparation of individual transportation analyses that identify and rectify any inconsistencies with General Plan policies, including those addressing transit services. Further, no capacity issues have been identified in connection with the San Bruno BART or Caltrain stations or SamTrans routes identified in Section 4.17.1.2, and capacity is anticipated to exceed demand through buildout of the Housing Element Update. For these reasons, implementation of the Housing Element Update would not conflict with any programs, plans, ordinances, or policies addressing transit services. **(Less than Significant Impact)**

Roadway Network

Construction-related activities associated with redevelopment the Housing Opportunity Sites would be subject to Section 6.16.070 of the San Bruno Municipal Code, subject to time of day and other restrictions pursuant to project-specific conditions the City might require. Construction staging is presumed to occur within the boundaries of the sites and outside of the public right-of-way. However, construction activity could result in temporary roadway and sidewalk closures, effects on roadway circulation due to construction trucks, an increase in vehicle trips and vehicular parking demand associated with construction workers, and relocation of bus stops and temporary transit detours. All future detailed construction plans would be required to undergo review by the San Bruno Fire Department before work begins. Temporary travel lane closures needed to make improvements to the street network would be coordinated with SamTrans and the City to reduce impacts on local circulation operations. These types of construction-related transportation impacts would be temporary, generally short term, and conducted in accordance with City permit requirements. Therefore, construction-related road closures, relocations, and modifications associated with future development of the Housing Opportunity Sites would be less than significant.

Programs, plans, ordinances, and policies regarding the roadway network are identified in Section 4.17.1.1. As discusses under Impact TRN-2, redevelopment of the Housing Opportunity Sites would have a less than significant VMT impact, and therefore would not conflict with SB 743. Future development under the Housing Element Update would be consistent with Plan Bay Area 2050 (refer to Section 4.11 Land Use and Planning and Section 4.14 Population and Housing) and would be required to prepare a TMD plan if it would generate 100 net new ADT, and therefore would be consistent with regional regulations regarding the roadway network. In addition to state and regional regulations, the City of San Bruno General Plan and associated Transportation Element include multiple policies adopted to avoid or reduce impacts to the roadway network, including policies related to LOS and intersection operations and payment of impact fees commensurate with the impact of new development. As noted in Section 1.1 Purpose of the Initial Study, future development under the Housing Element Update would be subject to project-level environmental review. As part of the project-level environmental review, a transportation analysis that includes an evaluation of future development in comparison with the City's policies adopted to avoid or reduce impacts to the roadway network would be required.

Mitigation Measures:

MM TRN-1.1: Prior to approval, the 2023-2031 Housing Element shall include a policy requiring future development at all Housing Opportunity Sites that would generate a sufficient amount of trips (as determined by the City's traffic engineer) to prepare a Transportation Analysis (TA) prior to the issuance of any discretionary permits. Prior to the preparation of the TA, a scope of work outlining the proposed approach to the TA shall be submitted to the Director of Public Works or the director's designee for review and approval. The TA, at a minimum, shall evaluate the proposed development for consistency with the City's General Plan and Walk 'N Bike Plan, review the proposed layout for any geometric design features that may increase hazards (e.g., sight distances, turning radii, etc.), and verify adequate emergency access is provided. The TA shall provide recommendations addressing any identified inconsistencies, geometric design hazards, or emergency access issues that shall be incorporated into the final design. The TA shall be prepared in accordance with Public Works' guidance and submitted prior to the approval of any discretionary permits as part of the project-level review of all future development under the Housing Element Update.

Implementation of MM TRN-1.1 would ensure that any inconsistencies with General Plan programs, plans, ordinances, and policies regarding the roadway network associated with operation of residential uses at the Housing Opportunity Sites are identified and addressed prior to approval of any discretionary permits. **(Less than Significant Impact with Mitigation Incorporated)**

Bicycle and Pedestrian Facilities

Programs, plans, ordinances, and policies regarding bicycle and pedestrian facilities, including the General Plan and Walk 'N Bike Plan, are identified in Section 4.17.1.1. Future development under the Housing Element Update would be required to comply with the policies identified in Section 4.17.1.1, including those requiring future development to enhance existing bicycle and pedestrian facilities and construct or fund improvements to these facilities through payment of impact fees. As discussed above, implementation of MM TRN-1.1 would require preparation of individual transportation analyses that identify and rectify any inconsistencies with General Plan policies, including those addressing bicycle and pedestrian facilities. For these reasons, implementation of the Housing Element Update would not conflict with any programs, plans, ordinances, or policies addressing bicycle or pedestrian facilities. **(Less than Significant Impact)**

Impact TRN-2: The project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). **(Less than Significant Impact)**

This question pertains specifically to VMT as the means of analyzing the transportation impacts of a project. As described in Section 4.17.1.1, OPR has directed local jurisdictions to implement a VMT policy pursuant to SB 743. For purposes of this Initial Study, the City of San Bruno relies on OPR's *Technical Advisory on Evaluating Transportation Impacts in CEQA* (dated December 2018), which recommends using a threshold of 15 percent below regional daily VMT per capita for residential

uses. Residential development in San Mateo County averages 13.8 daily VMT per resident, which equates to a threshold of 11.73 daily VMT per resident. Using the C/CAG VMT Estimation Tool, the VMT Analysis prepared by Hexagon Transportation Consultants (refer to Appendix C for more information on the assumptions, methodology, inputs, etc. used to estimate VMT generated by the project) estimated that buildout of the Housing Element Update would reduce VMT by 0.07 VMT per capita, and residential development at the Housing Opportunity Sites at the densities assumed by the Housing Element Update individually would not exceed 11.73 daily VMT per resident, and collectively would have an average weighted VMT of 11.67 per resident.^{[144][145]} Therefore, buildout of the Housing Element Update would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).

Impact TRN-3: The project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). **(Less than Significant Impact)**

Construction staging is presumed to occur within the boundaries of the Housing Opportunity Sites and outside of the public right-of-way. However, construction activity could result in temporary roadway and sidewalk closures, effects on roadway circulation due to construction trucks, an increase in vehicle trips and vehicular parking demand associated with construction workers, and relocation of bus stops and temporary transit detours. All future detailed construction plans would be required to undergo review by the San Bruno Fire Department before work begins. Temporary travel lane closures needed to make improvements to the street network would be coordinated with SamTrans and the City to reduce impacts on local circulation operations. These types of construction-related transportation impacts would be temporary, generally short term, and conducted in accordance with City permit requirements. Therefore, construction-related road closures, relocations, and modifications associated with future development under the Housing Element Update would not substantially increase hazards due to a geometric design feature.

As discussed under Impact TRN-1, all future development under the Housing Element Update would be required to prepare a TA prior to issuance of any discretionary permits which would include a review of the proposed layout for any geometric design features that may increase hazards, and recommendations to address any identified issues that would be incorporated into the final design. All of the Housing Opportunity Sites are adjacent to residential uses, and therefore redevelopment of the sites with residential uses would not be incompatible. For these reasons, buildout of the Housing Element Update would not substantially increase hazards due to a geometric design feature or incompatible uses.

¹⁴⁴ The 669 ‘pipeline’ units have already received discretionary entitlements and are excluded from this VMT analysis. Additionally, the location of the 240 ADUs is not foreseeable, as they can occur throughout the City in residentially zoned areas, and therefore evaluating their VMT would require speculation.

¹⁴⁵ After completion of the analysis presented in this Initial Study, the number of units assumed at Sites 8 and 21 increased by one unit each, the number of units assumed at Site 22 decreased by one unit, and the number of pipeline units decreased by one unit, resulting in a net increase of one unit and two residents assumed at the Housing Opportunity Sites (2,708 units versus 2,709 units, 7,150 residents versus 7,152 residents) and no increase in the total number of units and residents assumed for the Housing Element Update as a whole (3,618 units and 9,552 residents total). This change would not affect any of the conclusions presented herein this Initial Study.

Impact TRN-4: The project would not result in inadequate emergency access. (Less than Significant Impact)

Construction staging is presumed to occur within the boundaries of the Housing Opportunity Sites and outside of the public right-of-way. However, construction activity could result in temporary roadway and sidewalk closures, effects on roadway circulation due to construction trucks, an increase in vehicle trips and vehicular parking demand associated with construction workers, and relocation of bus stops and temporary transit detours. All future detailed construction plans would be required to undergo review by the San Bruno Fire Department before work begins. Temporary travel lane closures needed to make improvements to the street network would be coordinated with SamTrans and the City to reduce impacts on local circulation operations. These types of construction-related transportation impacts would be temporary, generally short term, and conducted in accordance with City permit requirements. Therefore, construction-related road closures, relocations, and modifications associated with redevelopment of the Housing Opportunity Sites would not result in inadequate emergency access.

As discussed under Impact TRN-1, all future development under the Housing Element Update would be required to prepare a TA prior to issuance of any discretionary permits which would identify any emergency access issues and provide recommendations addressing any issues that would be incorporated into the final design. As discussed in Section 4.9.2 under Impact HAZ-6, the Housing Element Update would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and all future development proposes would be reviewed by the San Bruno Fire Department prior to issuance of any construction or occupancy permits, whichever occurs first, for emergency access issues and consistency with California Building and Fire Codes. Accordingly, buildout of the Housing Element Update would not result in inadequate emergency access.

4.18 TRIBAL CULTURAL RESOURCES

The following discussion is based, in part, on a Cultural Resources Sensitivity Report prepared for the project by Archaeological/Historical Consultants, Inc. The report, dated September 2022, is on file with the Community and Economic Development Department.

4.18.1 Environmental Setting

4.18.1.1 *Regulatory Framework*

State

Senate Bill 18

The intent of SB 18 is to aid in the protection of traditional tribal cultural places through local land use planning by requiring city governments to consult with California Native American tribes on projects which include adoption or amendment of general plans (defined in Government Code Section 65300 et seq.) and specific plans (defined in Government Code Section 65450 et seq.). SB 18 requires local governments to consult with tribes prior to making certain planning decisions and to provide notice to tribes at certain key points in the planning process.

Assembly Bill 52

AB 52, effective July 2015, established a new category of resources for consideration by public agencies called Tribal Cultural Resources (TCRs). AB 52 requires lead agencies to provide notice of projects to tribes that are traditionally and culturally affiliated with the geographic area if they have requested to be notified. Where a project may have a significant impact on a tribal cultural resource, consultation is required until the parties agree to measures to mitigate or avoid a significant effect on a tribal cultural resource or until it is concluded that mutual agreement cannot be reached.

Under AB 52, TCRs are defined as follows:

- Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are also either:
- Included or determined to be eligible for inclusion in the California Register of Historic Resources, or
- Included in a local register of historical resources as defined in Public Resources Code Section 5020.1(k).
- A resource determined by the lead agency to be a TCR.

Local

City of San Bruno General Plan

Various policies in the City's General Plan have been adopted for the purpose of avoiding or mitigating impacts on tribal cultural resources resulting from planned development within the City including the following:

Policies	Description
ERC-F	Preserve and enhance historic and cultural resources within the City, particularly within the historic Downtown area.
ERC-39	Continue to protect archaeological sites and resources from damage. Require that areas found to contain significant indigenous artifacts be examined by a qualified archaeologist for recommendations concerning protection and preservation.
ERC-44	If, prior to grading or construction activity, an area is determined to be sensitive for paleontological resources, retain a qualified paleontologist to recommend appropriate actions. Appropriate action may include avoidance, preservation in place, excavation, documentation, and/or data recovery, and shall always include preparation of a written report documenting the find and describing steps taken to evaluate and protect significant resources.

Bayhill Specific Plan

As noted in Section 3.1.1.1, Housing Opportunity Sites 3 and 13 are located within the Bayhill Specific Plan area. Chapter Six of the Bayhill Specific Plan includes mandatory “Environmental Quality Policies”, including the following which pertain to cultural resources.

Policy 6-27

Policy 6-27 requires preparation of an Archaeological Monitoring Plan (AMP) by a qualified professional archaeologist prior to any project-related ground disturbance that outlines areas of archaeological sensitivity, if any, and includes protocol to follow if unanticipated archaeological or tribal cultural resources are encountered.

Policy 6-28

Policy 6-28 requires construction contractors to be trained in recognizing archaeological and tribal cultural resources.

Policy 6-29

Policy 6-29 requires all work to stop immediately if archaeological or tribal cultural resources are discovered during construction.

Policy 6-30

Policy 6-30 includes similar protections for human remains of Native American origin discovered during construction.

4.18.1.2 *Existing Conditions*

In Northern California, human occupation extends back to at least 9,000-11,500 years with Native American occupation and use of the Bay Area extending over 5,000-8,000 years and possibly longer. Native Americans at the time of Euro-American contact tended to live along the alluvial terraces and along historic Bay margins, there is potential for the discovery of Native American cultural resources within the City. Native American cultural resources have also been found in San Mateo County near sources of fresh water, including streams and creeks. All of the Housing Opportunity Sites are or

have previously been developed, and there are no known archaeological or tribal cultural resources at any of the Housing Opportunity Sites.

As part of the Cultural Resources Sensitivity Report (refer to the discussion in Section 4.5.1.2), Archaeological/Historical Consultants obtained a Sacred Lands File Search from the NAHC, which identified eight tribes affiliated with San Mateo County. Letters were sent to the identified tribes on May 18, 2022 inviting them to consult under SB 18 and AB 52. One response was received on May 21 from Michelle Zimmer on behalf of the Amah Mutsun Band of San Juan Bautista that requested the results of the records search of the Northwest Information Center's archives and for more information. A response email was sent on May 24; no further correspondence was received. On July 29, follow-up phone calls and emails were completed. Follow-up emails were again sent on August 16, and recipients were asked to comment by Friday, August 19, if they were interested in consulting under SB 18 and/or AB 52. The 90-day period to request consultation under SB 18 ended on August 16. No tribal cultural resources were identified by any of the contacted tribes, and none of the tribes affiliated with San Mateo County requested to be consulted regarding the project under SB 18 or AB 52.

4.18.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
1) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision I of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision(c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact TCR-1: The project would not cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k). **(Less than Significant Impact)**

As documented in Section 4.18.1.2 Existing Conditions, no known archaeological or tribal cultural resources are present at any of the Housing Opportunity Sites. No tribes have requested consultation or otherwise indicated the presence or likely presence of TCRs on the site. Future development of the Housing Opportunity Sites would therefore not cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k).

Impact TCR-2: The project would not cause a substantial adverse change in the significance of a tribal cultural resource that is determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in s subdivision (c) of Public Resources Code Section 5024.1. **(Less than Significant Impact with Mitigation Incorporated)**

As discussed in Section 4.18.1.1, tribal cultural resources can be sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe, or any resource determined by the Lead Agency to be a TCR.

As discussed in Section 4.18.1.2, there are no known archaeological or tribal cultural resources on any of the Housing Opportunity Sites, and no tribes affiliated with San Mateo County identified any tribal cultural resources in response to SB 18 and AB 52 outreach efforts.

As discussed in Section 4.5 Cultural Resources, Sites 1, 2, 3, 4, 5, 6, 7, 9, 10, 11, 12, 13, 15, 16 17, 18, 19, 20, 22, and 23 are sensitive for prehistoric-era archaeological resources. Despite a low sensitivity for archaeological resources, redevelopment of Sites 8 and 14 with residential uses has the potential to encounter undiscovered subsurface objects or human remains that may constitute a tribal cultural resource during ground-disturbing activities. Per the discussion in Section 4.5 under Impact CUL-2, implementation of MM CUL-2.1, MM CUL-2.2, MM CUL-2.3, and TCP Mitigation Measure 7-1 would ensure that any undiscovered subsurface resources encountered at any of the Housing Opportunity Sites during ground-disturbing activities are identified, evaluated, and appropriately treated in accordance with the recommendations of a qualified archaeologist and the requirements of CEQA. Per the discussion in Section 4.5 under Impact CUL-3, adherence with MM CUL-3.1 and Bayhill Specific Plan Policy 6-30 would ensure that any human remains encountered during ground-disturbing activities that are determined to be Native American in origin by the County coroner would be treated in accordance with the guidelines of the NAHC. For these reasons, implementation of the Housing Element as amended by MM CUL-2.1, MM CUL-2.2, MM CUL-2.3, and MM CUL-3.1 would ensure that future development under the Housing Element Update does not cause a substantial adverse change in the significance of a tribal cultural resource, if inadvertently encountered during construction at any of the Housing Opportunity Sites.

4.19 UTILITIES AND SERVICE SYSTEMS

The following discussion is based, in part, on a Water Supply Assessment prepared for the Housing Element Update by West Yost & Associates, Inc. A copy of this report, dated June 2022, is attached to this Initial Study as Appendix E.

4.19.1 Environmental Setting

4.19.1.1 *Regulatory Framework*

State

State Water Code

Pursuant to the State Water Code (Section 10635), water suppliers providing water for municipal purposes to more than 3,000 customers or supplying more than 3,000 acre-feet (approximately 980 million gallons) of water annually must prepare and adopt an urban water management plan (UWMP) and update it every five years. As part of a UWMP, water agencies are required to evaluate and describe their water resource supplies and projected needs over a 20-year planning horizon, water conservation, water service reliability, water recycling, opportunities for water transfers, and contingency plans for drought events. The San Francisco Public Utilities Commission (SFPUC), which supplies water supplies to the City of San Bruno, adopted its most recent UWMP in April 2021.

Bay-Delta Plan Amendment

In December 2018, the SWRCB adopted amendments to the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary (Bay-Delta Plan Amendment) to establish water quality objectives to maintain the health of the Bay-Delta ecosystem. The adopted Bay-Delta Plan Amendment was developed with the stated goal of increasing salmonid populations in three San Joaquin River tributaries (the Stanislaus, Merced, and Tuolumne Rivers) and the Bay-Delta. The Bay-Delta Plan Amendment requires the release of 30 to 50 percent of the “unimpaired flow” on the three tributaries from February through June in every year type.

If the Bay-Delta Plan Amendment is implemented, the SFPUC will be able to meet the projected water demands presented in the 2021 UWMP in normal years but would experience supply shortages in single dry years or multiple dry years. Implementation of the Bay-Delta Plan Amendment will require rationing in all single dry years and multiple dry years. The SFPUC has initiated an Alternative Water Supply Planning Program to ensure that it can meet its retail and wholesale customer water needs, address projected dry years shortages, and limit rationing to a maximum 20 percent system-wide in accordance with adopted SFPUC policies.

There is much uncertainty surrounding implementation of the Bay-Delta Plan Amendment. Since adoption of the Bay-Delta Plan Amendment, over a dozen lawsuits have been filed in both federal and state courts, challenging the SWRCB’s adoption of the Bay-Delta Plan Amendment, including a legal challenge filed by the federal government, at the request of the U.S. Department of Interior, Bureau of Reclamation. This litigation is in the early stages and there have been no dispositive court rulings as of this date.

Assembly Bill 341

AB 341 sets forth the requirements of the statewide mandatory commercial recycling program. Businesses that generate four or more cubic yards of garbage per week and multi-family dwellings with five or more units in California are required to recycle. AB 341 sets a statewide goal for 75 percent disposal reduction by the year 2020.

Assembly Bill 939

The California Integrated Waste Management Act of 1989, or AB 939, established the Integrated Waste Management Board, required the implementation of integrated waste management plans, and mandated that local jurisdictions divert at least 50 percent of solid waste generated (from 1990 levels), beginning January 1, 2000, and divert at least 75 percent by 2010. Projects that would have an adverse effect on waste diversion goals are required to include waste diversion mitigation measures.

Assembly Bill 1826

Assembly Bill 1826 (AB 1826) requires that state agencies, businesses, and multifamily complexes that generate specific quantities of organic or solid waste each week enroll in organic recycling programs through an applicable solid waste disposal company. Organic recycling programs may take the form of composting, mulching, or anaerobic digestion. Businesses and multi-family residential housing complexes that generate the following quantities are required to implement organic or solid waste recycling programs under AB 1826:

- Eight or more cubic yards of organic waste per week as of April 1, 2016;
- Four or more cubic yards of organic waste per week as of January 1, 2017;
- Four or more cubic yards of solid waste per week as of January 1, 2019; and
- Two or more cubic yards of solid waste per week as of January 1, 2020, if statewide disposal of organic waste is not reduced by half.

CalRecycle is currently evaluating whether California has achieved its statewide organic disposal goal of reducing organic waste disposal to 50 percent of 2014 levels by 2020. If this goal is not achieved, organic composting and recycling requirements will be expanded such that businesses that generate two or more cubic yards of solid waste per week must comply.

Senate Bill 221

SB 221 prohibits approval of subdivisions consisting of more than 500 dwelling units unless there is verification of sufficient water supplies for the project from the applicable water supplier(s). This requirement also applies to increases of 10 percent or more of service connections for public water systems with fewer than 500 service connections. The law defines criteria for determining “sufficient water supply,” such as using normal, single-dry, and multiple-dry year hydrology and identifying the amount of water that the supplier can reasonably rely on to meet existing and future planned use.

Senate Bill 610

SB 610 requires that certain large projects subject to CEQA prepare a specified Water Supply Assessment (WSA). The WSA must be furnished to the local government for inclusion in any environmental documentation for certain projects (as defined in Water Code 10912[a]) subject to CEQA. This legislation also expands the requirements for certain types of information in an UWMP, including an identification of any existing water supply entitlements, water rights, or water service contracts held relevant to the WSA for a proposed project, and a description of water deliveries received in prior years.

Senate Bill 1383

SB 1383 establishes targets to achieve a 50 percent reduction in the level of the statewide disposal of organic waste from the 2014 level by 2020 and a 75 percent reduction by 2025. The bill grants CalRecycle the regulatory authority required to achieve the organic waste disposal reduction targets and establishes an additional target that at least 20 percent of currently disposed edible food is recovered for human consumption by 2025.

California Green Building Standards Code

In January 2010, the State of California adopted the California Green Building Standards Code, establishing mandatory green building standards for all buildings in California. A recent update of these standards was published in July 2019 and went into effect on January 1, 2020. The code covers five categories: planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and indoor environmental quality. These standards include the following mandatory set of measures, as well as more rigorous voluntary guidelines, for new construction projects to achieve specific green building performance levels:

- Reducing indoor water use by 20 percent;
- Reducing wastewater by 20 percent;
- Recycling and/or salvaging 50 percent of nonhazardous construction and demolition debris; and
- Providing readily accessible areas for recycling by occupants.

Regional

SFPUC Right-of-Way Policies

The SFPUC owns and manages land and water system infrastructure for its own exclusive use that is part of the Hetch Hetchy Regional Water System. The primary use of SFPUC lands and easements is for the delivery, operation, maintenance and protection of water, power, and sewer systems. The SFPUC has adopted guidelines to help inform how and in which instances the easements can serve the needs of public agencies, private parties, nonprofit organizations, and developers, while maintaining the safety and security of the SFPUC pipelines. SFPUC guidelines pertain to land use and structures, recreational use, utilities, vegetation, and water efficiency. The easements also are subject to terms and restrictions regarding use of land contained in the original deeds granting the easements to the SFPUC.

SFPUC Water System Improvement Program

SFPUC's Water System Improvement Program (WSIP) was approved on October 31, 2008, with the purpose of improving the delivery reliability of the Regional Water System (RWS) that is operated by SFPUC. The objectives of the WSIP related to water supply are listed below.

- Meet average annual water demand of 265 million gallons daily (MGD) from the SFPUC watersheds for retail and wholesale customers during non-drought years for system demands consistent with the 2009 Water Supply Agreement.
- Meet dry-year delivery needs while limiting rationing to a maximum 20 percent system-wide reduction in water service during extended droughts.
- Diversify water supply options during non-drought and drought periods.
- Improve use of new water sources and drought management, including groundwater, recycled water, conservation, and transfers.

The WSIP provides benefits to the City by improving the reliability of wholesale water purchased from SFPUC, especially during periods of drought. The program aims to meet customer water needs in non- drought and drought conditions and provides dry-year water supply projects to augment all year type water supplies during drought. As of August 2021, the WSIP was approximately 99 percent complete; the currently forecasted date to complete the overall WSIP is May 2023.

South Westside Basin Groundwater Management Plan

The South Westside Basin Groundwater Management Plan (GWMP), completed in July 2012, includes strategies and recommendations that guide planning decisions in a manner that preserves groundwater within the South Westside Groundwater Basin, which supplies groundwater to the City of San Bruno. The GWMP indicates that the basin is not in overdraft and the City can pump at a rate of 2.1 MGD on a long-term basis.

Regional Groundwater Storage and Recovery Project

In December 2014, the Regional Groundwater Storage and Recovery (GSR) Project operating agreement was signed to ensure long-term management and sustainability of the South Westside Groundwater Basin through a strategic conjunctive use partnership. The partnership with the City of San Bruno, SFPUC, California Water Service (serving South San Francisco and Colma), and the City of Daly City allows the agencies to operate the basin jointly and provides a new 20-billion-gallon regional dry year groundwater supply. The project is included as part of the SFPUC WSIP described above. The City of San Bruno implemented conjunctive use operations starting in 2016.

The Regional GSR Project is an in-lieu groundwater recharge program that balances groundwater and the SFPUC RWS to increase drought year water supplies. Under the Regional GSR Project, the City operates under two supply modes that vary according to hydrologic conditions. During wet and normal years ("put" operations), SFPUC provides additional surface water to the City to reduce the City's groundwater pumping. The additional supply is stored in the South Westside Basin as

groundwater until it is needed during a drought or emergency. During dry years (“take” operations), the City utilizes available groundwater supplies and reduces surface water deliveries, thereby freeing surface water supply to be delivered to other SFPUC customers.

Local

City of San Bruno General Plan

Various policies in the City’s General Plan have been adopted for the purpose of avoiding or mitigating impacts on utilities and service systems resulting from planned development within the City including the following:

Policies	Description
PFS-3	Require, as part of plan review, identification of needed public service improvement and maintenance costs for those projects that may have a significant impact on existing services.
PFS-8	Require expansion of the City’s water distribution system proportionate with new development’s fair share of demand.
PFS-9	Upgrade the water distribution system as necessary to provide adequate water pressure to meet fire safety standards and to respond to emergency peak water supply needs.
PFS-17	Ensure that new or expanded water supply and transmission facilities are constructed in a manner in which construction and operation impacts are minimized or avoided.
PFS-20	Require expansion of the City’s sewer collection system proportionate with new development’s fair share of demand.
PFS-21	Upgrade or replace sewer lines to accommodate anticipated flows and to prevent overflows. Upgrade sewer lift stations as needed.
PFS-31	Ensure adequate fire water pressure as a condition of approval for all new development projects.
PFS-66	Enforce landscape requirements that facilitate efficient energy use or conservation, such as drought-resistant landscaping and/or deciduous trees along southern exposures.
PFS-70	Facilitate environmentally sensitive construction practices by: <ul style="list-style-type: none"> • Restricting use of chlorofluorocarbons (CFCs), hydrochlorofluorocarbons (HCFCs) and halons in mechanical equipment and building materials; • Promoting use of products that are durable and allow efficient end-of-life disposal (e.g. reusable, recyclable, biodegradable); • Promoting the purchase of locally or regionally available materials; and • Promoting the use of cost-effective design and construction strategies that reduce resource and environmental impacts.
PFS-72	Work with utility providers to ensure that adequate electrical and natural gas facilities and services are available to meet the demands of existing and future development.
PFS-73	Provide for utility access and prevent easement encroachments that might impair the safe and reliable maintenance and operation of utility facilities.
PFS-74	Work with telecommunication providers to ensure that telecommunications service is available for existing and future development.

City of San Bruno Water System Master Plan

The City's 2020 Water System Master Plan (WSMP), dated December 2021, served as an update to the City's 2012 Water Service Master Plan and provides a comprehensive road map for the City's water system through 2040. In addition to assessing the City's projected supply and demand through 2040, the 2020 WSMP updated the City's hydraulic model and evaluated the performance of the existing and future water system under existing and 2040 buildout water demand conditions. Based on the results of the performance analysis, the 2020 WSMP identified pipeline and facility rehabilitation and replacement projects. The 2020 WSMP also included a Water Shortage Contingency Plan (WSCP), a six-stage plan describing specific actions to reduce water demand by greater than 50 percent in the event of a water supply shortage or emergency.

City of San Bruno Sanitary Sewer Management Plan / Sewer Master Plan

Two documents govern San Bruno's sewer systems, 1) City of San Bruno Sewer Master Plan, dated February 2014, and; 2) City of San Bruno Sewer System Management Plan, dated October 2019. The February 2014 Sewer Master Plan was a legally mandated update to the 2000 Master Plan, and provides a sewer system condition assessment, a Capacity Assurance Plan, and a long-range Capital Improvement Program for the City's sewer system. The Sewer System Management Plan complements the Sewer Master Plan by providing policies, procedures, and activities related to the planning, management, operation, and maintenance of the City's sanitary sewer system.

City of San Bruno Storm Drain Master Plan

To identify and address potential flood risks in the City of San Bruno, a Storm Drain Master Plan was adopted by the City in June 2014. In addition to updating the City's flood control guiding document, the Master Plan defines a new Capital Improvement Program to address the storm drain system's capacity deficiencies.

4.19.1.2 *Existing Conditions*

Water Supply, Demand, and Conveyance

The City of San Bruno purchases treated surface water from SFPUC and North Coast County Water District (NCCWD) and delivers water to its customers through its water distribution system, which consists of 100 miles of pipelines, 9,000 valves, 985 fire hydrants, eight pumping stations, eight storage tanks, and 13 pressure zones. SFPUC water supplies are primarily derived from the Hetch Hetchy watershed within Yosemite National Park and subsequent downstream reservoirs, with the remaining SFPUC water supplies originating locally within the Bay Area. SFPUC provides an Individual Supply Guarantee of 3.25 MGD to the City of San Bruno, and a collective 184 MGD Individual Supply Guarantee to all members, including the City of San Bruno. Purchased NCCWD water only supplies the Crystal Springs Terrace Apartments located at 2000 Crystal Springs Road, which is not one of the Housing Opportunity Sites and therefore is not discussed further.

The City of San Bruno also obtains water locally from South Westside Basin groundwater resources. Most of the City of San Bruno is underlain by the South Westside Basin, which produces approximately 8,600 acre-feet of water annually and is ranked as a Very Low priority basin. As a Very Low priority basin, the Westside Basin users are not mandated to form a Groundwater

Sustainability Agency or develop a Groundwater Sustainability Plan. More information regarding the physical conditions of the South Westside Basin, as well as further details regarding the hydrological setting within the City of San Bruno, are included in Section 4.10 of this Initial Study. The City currently operates four groundwater wells. Prior to 2016, groundwater use comprised about 50 percent of the City's total water supply. In 2016, the City reduced its use of groundwater to about 10 percent of its total water supply in accordance with the Regional GSR Project (refer to Section 4.19.1.1). The City's groundwater production through the year 2031 is projected to remain at 2.10 MGD.

Wastewater Generation, Conveyance, and Treatment

The City of San Bruno owns and maintains the sanitary sewer conveyance system within City limits and is responsible for sewer system operation and maintenance therein. Wastewater is transported through this conveyance system to the Shaw Road Pump Station from two sewer pipeline segments: one located near Tanforan Avenue, and the other at 7th Avenue. Wastewater is then transported from the South San Francisco Shaw Road Sewage Pump Station, ultimately to the South San Francisco/San Bruno Water Quality Control Plant (WQCP) in South San Francisco for treatment. The WQCP processes wastewater discharge for the Cities of South San Francisco, San Bruno, and the Town of Colma. There is no formal agreement about the proportion of wastewater treatment capacity entitled to each city, however, the agreement is specific that the share of operating costs is proportional to use.

During dry weather conditions, the WQCP has a peak flow capacity of 13 MGD of wastewater, which is increased to a peak capacity of 62 MGD during wet weather flow conditions; average dry-weather flows at the WQCP are approximately 9 MGD, and average peak weather flows can exceed 60 MGD. To accommodate peak wet-weather flows, the WQCP is in the process of conducting facility improvements, which would include installation of a new storage basin to retain excess flows during wet-weather conditions. Currently, the City of San Bruno generates an average of approximately 2.146 MGD of dry-weather wastewater which is eventually conveyed to and treated at the South San Francisco/San Bruno WQCP from both the Tanforan Avenue and 7th Avenue systems, and has an allocated dry-weather capacity of 3.5 MGD at the WQCP.¹⁴⁶ The City generates a peak wet weather flow of approximately 20.3 MGD; the City does not have an allocated wet weather capacity at the South San Francisco/San Bruno WQCP.

Storm Drain System

San Bruno's Public Works Department Streets and Stormwater Division operates and maintains the storm drainage system in the City, which consists of underground pipes and culverts, as well as aboveground channels. The City of San Bruno contains six watersheds that drain the City. The City's primary drainage basins—Crystal Springs Creek, Huntington Creek, and San Bruno Creek—encompass 80 percent of San Bruno's land area. The storm drainage system generally drains eastward towards the San Bruno Channel, which discharges into the San Francisco Bay.

¹⁴⁶ Schumacker, Brian. Plant Superintendent. South San Francisco/San Bruno Water Quality Control Plant (WQCP). Personal communication. December 20, 2021.

Solid Waste Generation, Collection, and Disposal

Recology San Bruno (Solid Waste Information System (SWIS) ID 41-AA-0014) provides solid waste disposal services citywide, including garbage, recycling, and organic composting services. Recology San Bruno transports solid waste to the San Bruno Transfer Station at 101 Tanforan Avenue, where solid waste is processed, treated, and transported to other disposal facilities. The San Bruno Transfer Station has a maximum permitted capacity of 768 tons of solid waste per day. From the San Bruno Transfer Station, most of the City's solid waste is transported via trucks to Corinda Los Trancos Landfill (SWIS 41-AA-0002, formerly Ox Mountain Landfill) in Half Moon Bay, which has a remaining capacity of 22,180,000 cubic yards and serves the City of San Bruno as well as numerous other Bay Area jurisdictions. However, the City distributes limited quantities of its solid waste to numerous other Class III (non-hazardous) landfill facilities. All municipal Class III landfills that received City of San Bruno solid waste in 2018, the year with the most recent available data, are identified below in Table 4.19-1. While the City may have disposed of any permitted type of solid waste, including hazardous wastes at any of these facilities in 2018, only remaining municipal Class III disposal capacity is displayed.

Table 4.19-1: Capacity at Class III Landfill Facilities		
Facility (SWIS ID)	Remaining Capacity	Permitted Through
Altamont Landfill & Resource Recovery (01-AA-0009)	65,400,000	January 1, 2025
Corinda Los Trancos Landfill (41-AA-0002)	22,180,000	January 1, 2034
Fink Road Landfill (50-AA-0001)	7,184,701	December 1, 2023
Guadalupe Sanitary Landfill (50-AA-0001)	11,055,000	January 1, 2048
Monterey Peninsula Landfill (50-AA-0001)	48,560,000	February 28, 2107
Newby Island Sanitary Landfill (50-AA-0001)	21,200,000	January 1, 2041
Potrero Hills Landfill (50-AA-0001)	13,872,000	February 14, 2048
Recology Hay Road (50-AA-0001)	30,433,000	January 1, 2077
Recology Ostrom Road LF Inc. (50-AA-0001)	39,223,000	December 31, 2066
Vasco Road Sanitary Landfill (50-AA-0001)	7,379,000	December 31, 2022
Sources: CalRecycle. "Jurisdiction Disposal by Facility With Reported Alternative Daily Cover (ADC) and Alternative Intermediate Cover (AIC): Disposal During 2018 for San Bruno". Accessed October 17, 2022. https://www2.calrecycle.ca.gov/LGCentral/DisposalReporting/Destination/DisposalByFacility		

CalRecycle. "SWIS Facility/Site Search." Accessed October 17, 2022.

<https://www2.calrecycle.ca.gov/SolidWaste/Site/Search>

In 2021, the City of San Bruno generated 30,621 tons of solid waste, with residents generating approximately 4.4 pounds of solid waste per capita per day and employees generating 10.7 pounds of solid waste per capita per day. CalRecycle's 2021 disposal goals for the City of San Bruno were 4.5 pounds per day for residents; therefore, the City of San Bruno met its per capita solid waste diversion goals in 2021.¹⁴⁷ Per capita solid waste generation in the City has decreased over time due to numerous waste diversion programs, including source reduction, recycling, composting, incentivization, and public education initiatives.

Electricity, Natural Gas, and Telecommunication Services

Electrical power is provided by PG&E to the City of San Bruno from eight different distribution feeders: four feeders are from the Sneath Lane substation in San Bruno, two feeders are from the East Grand substation in South San Francisco, one is fed from the Airport substation, and one originates from the Millbrae substation in Millbrae. Most of these feeders also serve other cities, including Pacifica, Millbrae, and South San Francisco, and are linked to other distribution feeders, assuring greater reliability.

Natural gas is provided to the City of San Bruno by PG&E from three gas lines stretching from Milpitas to San Francisco. Gas is delivered from basins in Canada and/or Texas by transmission mains and deposited at PG&E's Milpitas Gas Terminal.

Telecommunication services is provided throughout San Bruno via underground coaxial, hardwire, and fiber optic systems operated by CityNet Services.

4.19.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
1) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2) Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

¹⁴⁷ CalRecycle. "Disposal Rate Calculator (San Bruno, 2021)". Accessed October 19, 2022.

<https://www2.calrecycle.ca.gov/LGCentral/AnnualReporting/DisposalRateCalculator>.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
3) Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5) Be noncompliant with federal, state, or local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Impact UTL-1: The project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. **(Less than Significant Impact)**

Water Facilities

Pursuant to the discussion under Impact UTL-2, sufficient water supplies are available to serve buildout of the Housing Element Update; therefore the construction of new or expanded water facilities, such as additional groundwater wells, to increase water supplies would not be required or result from buildout of the project.

As discussed in Section 4.19.1.1, the 2020 WSMP assessed the City's hydraulic model and evaluated the performance of the existing and future water system under existing and 2040 buildout water demand conditions, including buildout of the General Plan, TCP, and Bayhill Specific Plan. The 2020 WSMP identified pipeline and facility rehabilitation and replacement projects, which future development under the Housing Element Update would contribute to through the payment of development impact fees. Buildout of the Housing Element Update is not anticipated to require or result in any additional improvements beyond those identified in the 2020 WSMP except those needed to meet project-specific fire flow and water system design specifications, such as installing larger pipes in the adjacent public right-of-way. The construction of these facilities would be completed in accordance with Public Works requirements pursuant to the review of the City's Engineering and Construction Division, and in accordance with the regulations and measures identified throughout this Initial Study to control fugitive dust generation, dewatering of potentially contaminated water, sedimentation, erosion, and traffic control. Redevelopment of Site 14 with up to 1,000 residential units represents new residential water demand beyond what is assumed in the current General Plan and would be subject to these same controls and is not anticipated to generate a

significant increase in water demand or design needs beyond what is required by the existing Shops at Tanforan development. For these reasons, the construction or relocation of any water facilities as a result of the Housing Element Update would not cause any significant environmental effects. **(Less than Significant Impact)**

Wastewater Treatment Facilities

Pursuant to the discussion under Impact UTL-3, adequate capacity exists to treat increases in wastewater generation associated with buildout of the Housing Element Update. Improvements to the City's wastewater treatment facilities are identified in the City's Sewer System Management Plan prepared in February 2019, which future development under the Housing Element Update would contribute to through the payment of development impact fees. Buildout of the Housing Element Update is not anticipated to require any additional improvements beyond those identified in the Sewer System Management Plan except the installation of larger pipes on-site and in the public right-of-way to accommodate larger flows. These improvements would be completed in accordance with Public Works requirements pursuant to the review of the City's Engineering and Construction Division, and in accordance with the regulations and measures identified throughout this Initial Study to control fugitive dust generation, dewatering of potentially contaminated water, sedimentation, erosion, and traffic control. Redevelopment of Site 14 with up to 1,000 residential units represents new residential water demand and wastewater generation beyond what is assumed in the current General Plan and would be subject to these same controls and is not anticipated to generate a significant increase in wastewater flows beyond what is generated by the existing Shops at Tanforan development. For these reasons, the construction or relocation of any wastewater facilities as a result of the Housing Element Update would not cause any significant environmental effects. **(Less than Significant Impact)**

Stormwater Facilities

Improvements to the City's stormwater facilities are identified in the City's Storm Drain Master Plan (refer to Section 4.19.1.1), which future development under the Housing Element Update would contribute to through the payment of development impact fees. Buildout of the Housing Element Update is not anticipated to require any additional improvements beyond those identified in the Storm Drain Master Plan besides the installation of new catch basins, storm drains and associated minor infrastructure on-site as needed to address changes in pervious and impervious surfaces and associated drainage patterns. Pursuant to the discussion in Section 4.10 Hydrology and Water Quality under Impact HYD-3, the construction of new housing would not substantially alter the drainage pattern of any of the Housing Opportunity Sites in a manner which would result in on or offsite erosion, flooding, or runoff impacts. Further, any stormwater improvements necessary to serve new residential development would be constructed in accordance with Public Works requirements pursuant to the review of the City's Engineering and Construction Division, and in accordance with the regulations and measures identified throughout this Initial Study to control fugitive dust generation, dewatering of potentially contaminated water, sedimentation, erosion, and traffic control. For these reasons, the construction or relocation of any stormwater facilities as a result of the Housing Element Update would not cause any significant environmental effects. **(Less than Significant Impact)**

Electric Power, Natural Gas, and Telecommunication Facilities

Existing electric power, natural gas, and telecommunication facilities are available to all of the Housing Opportunity Sites. Future development under the Housing Element Update would be prohibited from using natural gas, and electric power and telecommunication facilities are sufficient to meet the demands of redevelopment of the Housing Opportunity Sites with residential uses at the at the densities assumed by the Housing Element Update. Further, all future development under the Housing Element Update would be required by the General Plan (refer to Section 4.19.1.1) to coordinate with PG&E and CityNet Services to ensure safe and reliable maintenance and operation of electric power and telecommunication facilities during construction and operation. The construction or relocation of any electric power or telecommunication facilities or the relocation of natural gas facilities during construction would be done in consultation with PG&E and CityNet Services and in accordance with the regulations and measures identified throughout this Initial Study to control fugitive dust generation, dewatering of potentially contaminated water, sedimentation, erosion, and traffic control. For these reasons, the construction or relocation of any electric power, natural gas, or telecommunication facilities as a result of the Housing Element Update would not cause any significant environmental effects. **(Less than Significant Impact)**

Impact UTL-2: The project would not have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years. **(Less than Significant Impact)**

The 2020 WSMP (refer to Section 4.19.1.1) assessed the City’s projected supply and demand through 2040 based on existing land uses and the projected buildout of the TCP and Bayhill Specific Plan sites, and found that water supplies were available to serve existing uses and buildout of these sites. As shown in Table 3.2-1, redevelopment of the TCP and Bayhill Specific Plan sites with residential uses at the densities assumed by the 2020 WSMP and Housing Element Update would result in the construction of 1,494 housing units. In addition to these 1,494 housing units (the water demand of which was analyzed in the 2020 WSMP), implementation of the Housing Element Update would redevelop Sites 6, 8, 10, 14, 16, 18, and 19 with up to 1,214 housing units.¹⁴⁸ Additionally, the WSA prepared for the Housing Element Update factored in the water demand generated by construction of the pipeline projects identified by the City (669 housing units) and 240 ADUs (refer to the discussion in Section 3.2.1). In total, the WSA analyzed the City’s projected water supply and demand through the year 2045 (including the TCP and Bayhill Specific Plan sites) plus buildout of an additional 2,229 housing units as a result of the Housing Element Update, for a total of 3,618 units. The estimated water demand of the additional 2,229 housing units is reported below in Table 4.19-2. Additional information on the assumptions and methodology used to estimate the project’s water demand is provided in Appendix E.

¹⁴⁸ After completion of the analysis presented in this Initial Study, the number of units assumed at Sites 8 and 21 increased by one unit each, the number of units assumed at Site 22 decreased by one unit, and the number of pipeline units decreased by one unit, resulting in a net increase of one unit and two residents assumed at the Housing Opportunity Sites (2,708 units versus 2,709 units, 7,150 residents versus 7,152 residents) and no increase in the total number of units and residents assumed for the Housing Element Update as a whole (3,618 units and 9,552 residents total). This change would not affect any of the conclusions presented herein this Initial Study.

Table 4.19-2: Estimated Water Demand Increase of the Housing Element Update			
Housing Opportunity Site/Category	Number of Housing Units	Water Use Factor (gpd/du)¹	Water Demand (gpd)
Site 6	118	147	17,346
Site 8 ²	15	147	2,205
Site 10	2	147	294
Site 14	1,000	147	147,000
Site 16	2	147	294
Site 18	15	147	2,205
Site 19	60	147	8,820
Pipeline Projects	670	147	98,490
Accessory Dwelling Units	240	147	35,280
Housing Element Update Totals	2,122	--	311,934
Source: West Yost & Associates, Inc. <i>City of San Bruno Housing Element Update Water Supply Assessment</i> . June 2022.			
Notes:			
¹ Water use factors include 8 percent of non-revenue water. Because the density of proposed housing units at each site is unknown, this WSA conservatively assumes that all proposed units are single-family residences (i.e., higher water use).			
² After completion of the analysis presented in this Initial Study, the number of units assumed at Sites 8 and 21 increased by one unit each, the number of units assumed at Site 22 decreased by one unit, and the number of pipeline units decreased by one unit, resulting in a net increase of one unit and two residents assumed at the Housing Opportunity Sites (2,708 units versus 2,709 units, 7,150 residents versus 7,152 residents) and no increase in the total number of units and residents assumed for the Housing Element Update as a whole (3,618 units and 9,552 residents total). This change would not affect any of the conclusions presented herein in this Initial Study.			

As shown in Table 4.19-2, the Housing Element Update would increase water demand by 311,934 gpd, equivalent to 0.33 MGD. The City's combined water demand versus water supplies during normal, single-, and multiple-dry years is summarized below in Table 4.19-3.

Table 4.19-3: Summary of Water Demand versus Water Supplies				
Category	Supply and Demand Comparison (mgd)^{[1][2]}			
	2030	2035	2040	2045
Normal Year				
Available Water Supply	5.37	5.35	5.35	5.36
Total Water Demand ³	3.95	4.37	4.78	4.78
Surplus (Deficit)	1.42	0.98	0.57	0.58
Percent Shortfall	--	--	--	--

Table 4.19-3: Summary of Water Demand versus Water Supplies				
Category	Supply and Demand Comparison (mgd)^{[1][2]}			
	2030	2035	2040	2045
Single-Dry Year				
Available Water Supply	4.18	4.16	4.16	3.88
Total Water Demand ³	3.95	4.37	4.78	4.78
Surplus (Deficit)	0.23	(0.21)	(0.62)	(0.90)
Percent Shortfall	--	5%	13%	19%
Multiple-Dry Year 1				
Available Water Supply	4.18	4.16	4.16	3.88
Total Water Demand ³	3.95	4.37	4.78	4.78
Surplus (Deficit)	0.23	(0.21)	(0.62)	(0.90)
Percent Shortfall	--	5%	13%	19%
Multiple-Dry Year 2				
Available Water Supply	3.89	3.87	3.87	3.88
Total Water Demand ³	3.95	4.37	4.78	4.78
Surplus (Deficit)	(0.06)	(0.50)	(0.91)	(0.90)
Percent Shortfall	2%	11%	19%	19%
Multiple-Dry Year 3				
Available Water Supply	3.89	3.87	3.87	3.88
Total Water Demand ³	3.95	4.37	4.78	4.78
Surplus (Deficit)	(0.06)	(0.50)	(0.91)	(0.90)
Percent Shortfall	2%	11%	19%	19%
Multiple-Dry Year 4				
Available Water Supply	3.89	3.87	3.66	3.61
Total Water Demand ³	3.95	4.37	4.78	4.78
Surplus (Deficit)	(0.06)	(0.50)	(1.12)	(1.17)
Percent Shortfall	2%	11%	23%	24%
Multiple-Dry Year 5				
Available Water Supply	3.89	3.73	3.66	3.61
Total Water Demand ³	3.95	4.37	4.78	4.78
Surplus (Deficit)	(0.06)	(0.64)	(1.12)	(1.17)
Percent Shortfall	2%	15%	23%	24%

Table 4.19-3: Summary of Water Demand versus Water Supplies				
Category	Supply and Demand Comparison (mgd)^{[1][2]}			
	2030	2035	2040	2045
Source: West Yost & Associates, Inc. <i>City of San Bruno Housing Element Update Water Supply Assessment</i> . June 2022.				
Notes:				
¹ Supply totals assume implementation of the Bay-Delta Plan Amendment.				
² Demand totals assume no reduction in water demand in dry years.				
³ After completion of the analysis presented in this Initial Study, the number of units assumed at Sites 8 and 21 increased by one unit each, the number of units assumed at Site 22 decreased by one unit, and the number of pipeline units decreased by one unit, resulting in a net increase of one unit and two residents assumed at the Housing Opportunity Sites (2,708 units versus 2,709 units, 7,150 residents versus 7,152 residents) and no increase in the total number of units and residents assumed for the Housing Element Update as a whole (3,618 units and 9,552 residents total). This change would not affect any of the conclusions presented herein this Initial Study.				

As shown in Table 4.19-3, there are sufficient supplies to meet the City's cumulative water demand in normal years, but insufficient supplies to meet projected demands in single- and multiple-dry years, with percent shortfalls as high as 24 percent in 2045. The totals presented in Table 4.19-3 are extremely conservative, as they do not account for the water demand of the existing uses at the Housing Opportunity Sites and assume full implementation of the Bay Delta Plan Amendment, which as discussed in Section 4.19.1.1 is highly unlikely. Supply shortfalls would be nearly be eliminated without implementation of the Bay Delta Plan Amendment, with water supply shortfalls of less than one percent in the fourth and fifth multiple-dry year 2045 scenario (refer to Appendix E). As discussed in Section 4.19.1.1, the City's WSCP is capable of achieving water demand reductions of up to 50 percent. In the event of water supply deficits, the City will implement the WSCP, which is capable of achieving demand reductions that would ensure that water supplies exceed water demand in the event of a 24 percent shortfall or greater. Accordingly, sufficient water supplies are available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.

Impact UTL-3: The project would not result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments. **(Less than Significant Impact)**

As discussed under Impact UTL-2, buildout of the Housing Element Update would increase water consumption by 0.33 MGD, which results in a corresponding increase in wastewater of 0.29 MGD.¹⁴⁹ As documented in Section 4.19.1.2, the City of San Bruno currently generates an average of 2.146 MGD of wastewater during dry-weather (when WQCP treatment capacity is at its lowest). Buildout of the Housing Element Update would increase the average amount of wastewater generated to 2.436 MGD, which would be below the City's allocated dry-weather capacity of 3.5 MGD at the WQCP. Additionally, the WQCP collects and treats flows from the City of South San

¹⁴⁹ Based upon the CalEEMod standard estimate of wastewater comprising 85 percent of indoor water use due to human consumption, landscape use, and evaporation loss.

Francisco (average dry-weather flow of 4.912 MGD) and the City of Colma (average dry-weather flow of 0.195 MGD).¹⁵⁰ Cumulatively, the combined dry-weather flows from the cities of San Bruno, South San Francisco, and Colma would amount under project conditions to 7.543 MGD, well within the WQCP's dry-weather capacity of 13 MGD.¹⁵¹ Accordingly, the Housing Element Update would not result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

Impact UTL-4: The project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. **(Less than Significant Impact)**

Demolition and construction activities generate solid waste materials requiring disposal, such as steel, concrete, asphalt, and lumber. CALGreen requires that at least 65 percent of all debris from demolition of any residential building be diverted from landfills via recycling, salvage, and other similar programs. Achievement of solid waste reduction goals would be further supported by MM GHG-1.1 (refer to Section 4.8 Greenhouse Gas Emissions), which would require the recycling or reuse of at least 50 percent of construction waste. Accordingly, demolition and construction associated with future development under the Housing Element Update would not generate waste in excess of local infrastructure capacity or impair the attainment of solid waste reduction goals.

Buildout of an additional 3,618 housing units is estimated to generate 3.9 pounds per resident daily, equivalent to 37,253 pounds per day or an additional 6,799 tons of solid waste annually.¹⁵² Housing units associated with pipeline projects have already undergone plan- and project-level analysis of their contribution to the capacity of local infrastructure and solid waste reduction goals, which were found to be less than significant (refer to Section 3.2.1). Based on the City's 2021 total solid waste generation of 30,621 tons, which is conservative since per capita solid waste generation continues to trend downward (refer to Section 4.19.1.2), buildout of the Housing Opportunity Sites and ADUs would increase the City's total solid waste generation to 37,420 tons annually.

As discussed in Section 4.19.1.2, the San Bruno Transfer Station has a maximum permitted capacity of 768 tons of solid waste per day. Based on the projected total solid waste generation of 37,420 tons annually, the San Bruno Transfer Station would need to process 103 tons of waste daily, well within its maximum permitted capacity.

¹⁵⁰ Schumacker, Brian. Plant Superintendent. South San Francisco/San Bruno Water Quality Control Plant (WQCP). Personal communication. December 20, 2021.

¹⁵¹ After completion of the analysis presented in this Initial Study, the number of units assumed at Sites 8 and 21 increased by one unit each, the number of units assumed at Site 22 decreased by one unit, and the number of pipeline units decreased by one unit, resulting in a net increase of one unit and two residents assumed at the Housing Opportunity Sites (2,708 units versus 2,709 units, 7,150 residents versus 7,152 residents) and no increase in the total number of units and residents assumed for the Housing Element Update as a whole (3,618 units and 9,552 residents total). This change would not affect any of the conclusions presented herein this Initial Study.

¹⁵² Source: CalRecycle. "Disposal Rate Calculator (San Bruno, 2019)". Accessed October 19, 2022. <https://www2.calrecycle.ca.gov/LGCentral/AnnualReporting/DisposalRateCalculator>. 3,618 housing units multiplied by 2.64 (average number of residents per unit in San Bruno) equals 9,552 new residents. Multiplied by 3.9 (pounds per resident per day) equals 37,253 pounds per day. Multiplied by 365 days in a year equals 13,597,345 pounds annually, equivalent to 6,799 tons annually.

The majority of solid waste is distributed to the Corinda Los Trancos Landfill, which has a remaining capacity of 22,180,000 cubic yards and is permitted for continued service through 2034, beyond the buildout date of the San Bruno Housing Element. This capacity is sufficient to support proposed project solid waste disposal needs through 2034. Using CalRecycle's conversion rate of one cubic yard for every 800 pounds, 37,420 tons generated annually between 2031 and 2034 is equivalent to 282,120 cubic yards, or approximately one percent of the remaining capacity of Corinda Los Trancos Landfill.¹⁵³ The Housing Element Update's contribution to Corinda Los Trancos Landfill would be less than 1/100th of a percent.¹⁵⁴ Further, as shown in Table 4.19-1, the combined remaining capacity at the Class III Municipal Waste Landfill Facilities that serve the City of San Bruno beyond 2034 is approximately 164,343,000 cubic yards. The City's annual contribution would be less than 1/1,000th of a percent.¹⁵⁵ Therefore, sufficient landfill capacity exists to serve the Housing Element Update and the City at Corinda Los Trancos landfill through 2034, and at Guadalupe Sanitary Landfill, Monterey Peninsula Landfill, Newby Island Sanitary Landfill, Potrero Hills Landfill, Recology Hay Road, and/or Recology Ostrom Road LF, Inc. beyond 2034.

Because Corinda Los Trancos Landfill serves numerous Bay Area jurisdictions, growth within these jurisdictions could also contribute to cumulative solid waste disposal demands on the facility. However, many of these jurisdictions are also served by the facilities listed above which would offer continued operation beyond 2034. Therefore, cumulative growth in other jurisdictions is not expected to contribute to local solid waste infrastructure capacity exceedances. Additionally, while it is expected that local and regional landfills would have sufficient capacity to support the Housing Element Update in conjunction with Citywide and regional development, AB 1826 requires multi-family residential developments that generate more than four cubic yards of solid waste per week to incorporate organic recycling programs, such as composting. It is therefore anticipated that some of that solid waste generated by future development under the Housing Element Update would be redirected in compliance with AB 1826, further minimizing anticipated solid waste generation levels. Thus, the Housing Element Update's cumulative impacts pertaining to solid waste standard or facility exceedances, as well as compliance with federal, state, and local solid waste management and reduction statutes and regulations, would be less than cumulatively considerable, and impacts would therefore be less than significant.

Impact UTL-5: The project would not be noncompliant with federal, state, or local management and reduction statutes and regulations related to solid waste.
(Less than Significant Impact)

As discussed under Impact UTL-4, 65 percent of demolition debris and 50 percent of construction waste would be recycled or reused in compliance with CalGreen. Once operational, future development under the Housing Element Update would be required to comply with the provisions of

¹⁵³ 37,420 tons is equivalent to 74,840,000 pounds, multiplied by three (years from Housing Element buildout until Corinda Los Trancos Landfill closure date) divided by 800 (CalRecycle conversion rate) equals 280,650 cubic yards. 280,650 divided by 22,180,000 equals 0.012.

¹⁵⁴ 6,799 tons is equivalent to 13,597,345 pounds, multiplied by three (years from Housing Element buildout until Corinda Los Trancos Landfill closure date) divided by 800 equals 50,991 cubic yards. 50,991 divided by 22,180,000 (Corinda Los Trancos Landfill remaining capacity) equals 0.0022.

¹⁵⁵ 93,550 cubic yards (City's combined annual contribution) divided by 164,343,000 equals 0.0005.

AB 341 and AB 1826. Compliance with federal, state, and local statutes and regulations related to solid waste would be further supported by the use of reusable, recyclable, and biodegradable materials as promoted by General Plan Policy HS-70. Accordingly, the Housing Element Update would be compliant with federal, state, and local management and reduction statutes and regulations related to solid waste.

4.20 WILDFIRE

4.20.1 Environmental Setting

4.20.1.1 *Regulatory Framework*

State

Fire Hazard Severity Zones

CAL FIRE is required by law to map areas of significant fire hazards based on fuels, terrain, weather, and other relevant factors. Referred to as Fire Hazard Severity Zones (FHSZs), these maps influence how people construct buildings and protect property to reduce risk associated with wildland fires. FHSZs are divided into areas where the state has financial responsibility for wildland fire protection, known as state responsibility areas (SRAs), and areas where local governments have financial responsibility for wildland fire protection, known as local responsibility areas (LRAs). Homeowners living in an SRA are responsible for ensuring that their property is in compliance with California's building and fire codes. Only lands zoned for very high fire hazard are identified within LRAs.

California Fire Code Chapter 49

Chapter 49 of the California Fire Code sets requirements for wildland-urban interface fire areas that increase the ability of buildings to resist the intrusion of flame or burning embers being projected by a vegetation fire, in addition to systematically reducing conflagration losses through the use of performance and prescriptive requirements.

California Public Resources Code Section 4442 through 4431

The California Public Resources Code includes fire safety regulations that restrict the use of equipment that may produce a spark, flame, or fire; require the use of spark arrestors on construction equipment that uses an internal combustion engine; specify requirements for the safe use of gasoline-powered tools on forest-covered land, brush-covered land, or grass-covered land; and specify fire suppression equipment that must be provided onsite for various types of work in fire-prone areas. These regulations include the following:

- Earthmoving and portable equipment with internal combustion engines would be equipped with a spark arrestor to reduce the potential for igniting a wildland fire (Public Resources Code Section 4442);
- Appropriate fire suppression equipment would be maintained during the highest fire danger period, from April 1 to December 1 (Public Resources Code Section 4428);
- On days when a burning permit is required, flammable materials would be removed to a distance of 10 feet from any equipment that could produce a spark, fire, or flame, and the construction contractor would maintain appropriate fire suppression equipment (Public Resources Code Section 4427); and
- On days when a burning permit is required, portable tools powered by gasoline-fueled internal combustion engines would not be used within 25 feet of any flammable materials (Public Resources Code Section 4431).

California Code of Regulations Title 14

The California Board of Forestry and Fire Protection has adopted regulations, known as SRA Fire Safe Regulations, which apply basic wildland fire protection standards for building, construction, and development occurring in a SRA. The future design and construction of structures, subdivisions and developments in SRAs are required to provide for the basic emergency access and perimeter wildfire protection measures discussed in Title 14.

Fire Management Plans

CAL FIRE has developed an individual Unit Fire Management Plan for each of its 21 units and six contract counties. CAL FIRE has developed a strategic fire management plan for the San Mateo-Santa Cruz Unit, which covers the project area and addresses citizen and firefighter safety, watersheds and water, timber, wildlife and habitat (including rare and endangered species), unique areas (scenic, cultural, and historic), recreation, range, structures, and air quality. The plan includes stakeholder contributions and priorities and identifies strategic areas for pre-fire planning and fuel treatment as defined by the people who live and work with the local fire issues.

Local

City of San Bruno General Plan

Various policies in the City’s General Plan have been adopted for the purpose of avoiding or mitigating wildfire impacts resulting from planned development within the City including the following:

Policies	Description
HS-1	Regulate development, including remodeling or structural rehabilitation, to assure adequate mitigation of safety hazards on sites having a history or threat of slope instability, erosion, subsidence, seismic dangers (including those resulting from liquefactions, ground failure, ground rupture), flooding, and/or fire hazards.
HS-2	Review and revise the City’s Building Code, Zoning Ordinance, and Subdivision requirements to safeguard against seismic, geologic, and safety hazards. Mitigation should include: <ul style="list-style-type: none">• Minimal grading and removal of natural vegetation to prevent erosion and slope instability. Cleared slopes should be replanted with vegetation.• Proper drainage control to prevent erosion of the site and affected properties.• Careful siting and structural engineering in unstable areas.• Consideration of flooding and fire hazards in siting and designing new development.
HS-43	Allow reasonable latitude for noise generated by uses that are essential to community health, safety, and welfare, such as emergency vehicle operations and sirens.
PFS-F	Provide adequate public safety services for all San Bruno properties – including police protection, fire suppression, emergency medical care, and emergency management.
PFS-26	Ensure adequate staffing and facilities for the City’s Police and Fire departments to achieve desired levels of service, particularly surrounding transit areas and along urban-interface hazard areas.

Policies	Description
PFS-30	Require installation and maintenance of fire protection measures in high-risk and urban-interface areas: <ul style="list-style-type: none"> • Proper siting and access; • Brush clearance (non-fire resistant landscaping 50 feet from structures); • Use of fire resistive materials (pressure-impregnated, fire resistive shingles or shakes); • Landscaping with fire resistive species; and • Installation of early warning systems (alarms and sprinklers).
PFS-31	Ensure adequate fire water pressure as a condition of approval for all new development projects.
PFS-32	Require installation of residential sprinklers in areas with steep slopes and/or diminished access.
PFS-34	Identify and remove mature and/or diseased Eucalyptus trees in rights-of-way and other open areas, if they pose a fire hazard or other threat to health and safety.
PFS-35	Require installation of automatic sprinkler systems in all hotel, motel, and other overnight lodging facilities, in mixed commercial/residential uses, and in apartment buildings of three or more units.
PFS-39	Minimize risks to single-access residential neighborhoods by providing alternative access for fire and other emergency personnel.

4.20.1.2 *Existing Conditions*

No portion of San Bruno is within a SRA; the City is located in a LRA in the CAL FIRE San Mateo – Santa Cruz Administrative Unit and contains no very high fire hazard severity zones.¹⁵⁶

The greatest potential for fire hazards in the City of San Bruno occurs in designated Wildland Fire Hazard Areas near extensive natural vegetation, specifically Crestmoor Canyon, Junipero Serra County Park, and San Francisco Water Department’s Peninsula Watershed. Dense stands of eucalyptus trees within the Rollingwood and Crestmoor neighborhoods also pose fire hazard potential. Urban-interface hazard areas are developed areas near Wildland Fire Hazard Areas potentially at risk of damage should a wildland fire occur. In these areas, highly flammable vegetation mixed with steep topography and long, dry summers create potential for wildland fires.

Housing Opportunity Sites

Housing Opportunity Site 6 (2101 Sneath Lane) is located within the Wildland Fire Hazard Area and Wildland/Urban Interface Hazard Area, as shown on Figure 4.20-1. Small portions of Housing Opportunity Sites 3 and 14 are identified as Wildland/Urban Interface Hazard Areas (refer to Figure 4.20-1).

¹⁵⁶ California Department of Forestry and Fire Protection. *Fire Hazard Severity Zone Viewer*. Accessed October 24, 2022. <https://egis.fire.ca.gov/FHSZ/>

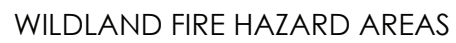


FIGURE 4.20-1

4.20.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
1) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

4.20.2.1 *Wildfire Analysis*

None of the Housing Development Sites are located in or near state responsibility areas or lands classified as very high fire hazard severity zones. As shown on Figure 4.20-1, Site 6 is located within a Wildland Fire Hazard Area, and small portions of Housing Opportunity Sites 3 and 14 are identified as Wildland/Urban Interface Hazard Areas. Adherence with General Plan Policy PFS-30 would require future development at Sites 3, 6, and 14 to install and maintain a variety of fire protection measures, and all construction would be required by the City's Municipal Code to be built to 2019 California and International Fire Code standards with fire suppression systems. Further, as discussed in Section 4.15 under Impact PS-1, fire protection services are adequate to meet new demand generated by redevelopment of Sites 3, 6, and 14. For these reasons, future development under the Housing Element Update would not result in any wildfire-related impacts. **(Less than Significant Impact)**

4.21 MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
1) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact MFS-1: The project does not have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory. **(Less than Significant Impact with Mitigation Incorporated)**

As discussed in the individual resource sections of this Initial Study, future development under the Housing Element Update would not degrade the quality of the environment with the implementation of the identified General Plan, TCP, and Bayhill Specific policies and mitigation measures. As discussed in Section 4.4 Biological Resources, implementation of MM BIO-1.1, consistent with federal and state laws, would ensure that future development does not result in the loss of fertile or nesting eggs or nest abandonment. Further, the Housing Element Update with adherence to federal, state, regional and local regulations would not reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. Implementation of MM CUL-1.1, MM CUL-2.1, and MM CUL-2.2 (refer to Section 4.5 Cultural Resources) and MM NOI-2.1 (refer to Section 4.13 Noise and Vibration) would ensure that future

development does not cause a substantial adverse change in the significance of any archaeological, historic, or tribal cultural resources. Adherence with MM GHG-1.1 and MM GHG-1.2 (refer to Section 4.8 Greenhouse Gas Emissions) by future residential development would ensure that the project does not generate significant GHG emissions and would support the state's long-term goal of carbon neutrality. Adherence with MM HAZ-2.1 and MM HAZ-2.2 (refer to Section 4.9 Hazards and Hazardous Materials) would ensure that any subsurface contamination present at the Housing Opportunity Sites does not create a significant hazard to the public or the environment.

With adherence to federal, state, and local regulations and implementation of the mitigation measures identified above, the Housing Element Update would not degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory.

Impact MFS-2: The project does not have impacts that are individually limited, but cumulatively considerable. **(Less than Significant Impact with Mitigation Incorporated)**

Under Section 15065(a)(3) of the CEQA Guidelines, a lead agency shall find that a project may have a significant effect on the environment where there is substantial evidence that the project has potential environmental effects "that are individually limited, but cumulatively considerable." As defined in Section 15065(a)(3) of the CEQA Guidelines, cumulatively considerable means "that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects."

The analysis provided throughout this Initial Study presents the combined effects of the implementation of the 2023-2031 Housing Element, taking into account the planned future development of 3,618 housing units over the next eight years, with the large majority of the units expected to be built on the 23 identified Housing Opportunity Sites. As such, this Initial Study presents the cumulative impacts of the Housing Element, based on the planned location of that future housing. However, the City will experience additional growth and change over that timeframe, in terms of non-residential development and public facilities that will occur consistent with the General Plan and other long-range planning documents. The discussion that follows presents how the Housing Element would contribute to foreseeable cumulative impacts.

Because criteria air pollutant and GHG emissions would contribute to regional and global emissions of such pollutants, the identified thresholds developed by CARB and BAAQMD and used by the City of San Bruno were developed such that an impact would also be a cumulatively considerable impact. Buildout of the Housing Element Update would not result in a significant emissions of criteria air pollutants or GHG emissions and, therefore, would not make a substantial contribution to cumulative air quality or GHG emissions impacts. The discussion of criteria air pollutant impacts presented in Section 4.3 Air Quality also reflects cumulative conditions, and the project would not contribute to significant cumulative criteria pollutant impacts. The Housing Element's contribution to cumulative climate change impacts was presented in Section 4.8 Greenhouse Gas Emissions as less

than cumulatively considerable. Similarly, for the reasons presented in Section 4.6, the discussion of the project's incremental demand on energy resources also reflects cumulative conditions, since the Housing Element's future population's consumption of electricity, natural gas, and gasoline was assessed in comparison with consumption at the state and county level. Therefore, the Housing Element Update would not make a substantial contribution to cumulative air quality, energy use, or GHG emissions impacts.

The project would not impact agricultural or forestry resources or mineral resources, therefore there is no potential for cumulative impacts to these resources. Nor are there any cumulative impacts associated with wildfire risk, as none of the Housing Development Sites are located in or near state responsibility areas or lands classified as very high fire hazard severity zones. However, Site 6 is located within a Wildland Fire Hazard Area, and small portions of Housing Opportunity Sites 3 and 14 are identified as Wildland/Urban Interface Hazard Areas. Sites 3, 6, and 14 and any cumulative development within a Wildland Fire Hazard or Wildland/Urban Interface Areas would be required by General Plan Policy PFS-30 to install and maintain a variety of fire protection measures, and all construction would be required by the City's Municipal Code to be built to 2019 California and International Fire Code standards with fire suppression systems. Therefore, cumulative wildfire-related impacts would be less than cumulatively considerable.

As discussed throughout this Initial Study, future development under the Housing Element Update would result in less than significant impacts to aesthetics, geology and soils, hydrology and water quality, land use and planning, population and housing, public services, recreation, and utilities and service systems with adherence to federal, state, regional and local regulations and policies. The discussions presented in Section 4.11 Land Use and Planning, Section 4.14 Population and Housing, Section 4.15 Public Services, Section 4.16 Recreation, and Section 4.19 Utilities and Service Systems take account of planned growth in San Bruno according to the current General Plan and relevant Specific Plans, and represent a cumulative analysis of future development under the Housing Element Update due to the nature of these individual resource areas, and therefore the project would not result in a cumulatively considerable impact as regards these resources.

Cumulative impacts related to aesthetics, geology and soils, and hydrology and water quality are more localized in nature. As discussed in Section 1.1, specific development proposals at the Housing Opportunity Sites would be subject to project-level review at the time of application for any discretionary actions that would allow for an analysis of the cumulative impacts of said proposals based on their design and in conjunction with projects in the cumulative area of effect, which are not reasonably foreseeable at this time. Cumulative impacts to hydrology and water quality are related to the watershed within which the various Housing Opportunity Sites would occur, and the policies and programs presented in Section 4.10, such as the Municipal Regional Permit addressing stormwater, are intended to address the potential for individual projects to contribute to cumulative impacts. Further, all cumulative development in the City of San Bruno would be subject to the same regulations and policies that would be imposed on future development under the Housing Element Update. For these reasons, the Housing Element Update would not result in cumulatively considerable impacts on aesthetics, geology and soils, hydrology and water quality.

As discussed in Section 4.13 Noise and Vibration, buildout of the Housing Element Update would not increase traffic noise levels on any one roadway by more than 0.7 dBA. Therefore, although under existing plus background plus project conditions the traffic noise level on San Bruno Avenue

would increase by as much as three dBA by 2031, the traffic noise increase associated with buildout of the Housing Element Update would not be cumulatively considerable.

As discussed in Section 4.17 Transportation, buildout of the Housing Element Update would reduce VMT citywide and would not conflict with any programs, plans, ordinances, or policies addressing the regional or local circulation system. Further, all future development under the Housing Element Update would be required by MM TRN-1-1 to prepare a Transportation Analysis that would analyze the design of specific development proposals at the Housing Opportunity Sites (which are not reasonably foreseeable at this time) to ensure that the design does not increase hazards or result in inadequate emergency access in conjunction with surrounding development. Accordingly, the Housing Element Update would not contribute to any cumulative transportation impacts.

During construction of future development under the Housing Element Update, highly localized and temporary air quality, biological, cultural, hazards and hazardous materials, and noise and vibration impacts would occur on and around each Opportunity Site. Compliance with federal, state, regional and local regulations and implementation of the conditions of approval and mitigation measures identified in this Initial Study and in the EIRs prepared for the City's General Plan, TCP, and Bayhill Specific Plan would reduce cumulative impacts associated with each project's construction and future cumulative development to a less than significant level.

Impact MFS-3: The project does not have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly. **(Less than Significant Impact with Mitigation Incorporated)**

Consistent with Section 15065(a)(4) of the CEQA Guidelines, a lead agency shall find that a project may have a significant effect on the environment where there is substantial evidence that the project has the potential to cause substantial adverse effects on human beings, either directly or indirectly. Under this standard, a change to the physical environment that might otherwise be minor must be treated as significant if people would be significantly affected. This factor relates to adverse changes to the environment of human beings generally, and not to effects on particular individuals. While changes to the environment that could indirectly affect human beings would be represented by all of the designated CEQA issue areas, those that could directly affect human beings include air quality, hazardous materials, and noise. As documented in Section 4.3 Air Quality, Section 4.9 Hazards and Hazardous Materials, and Section 4.13 Noise and Vibration of this Initial Study, implementation of the federal, state, regional and local policies and mitigation measures that have been identified would reduce these impacts to a less than significant level. No other direct or indirect adverse effects on human beings have been identified.

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SECTION 6.0 LEAD AGENCY AND CONSULTANTS

6.1 LEAD AGENCY

Michael Laughlin, Planning & Housing Manager
Michael Smith, Senior Planner

6.2 CONSULTANTS

David J. Powers & Associates, Inc.

Environmental Consultants and Planners

Akoni Danielsen, President/Principal Project Manager
Natalie Noyes, Senior Project Manager
Matthew Moore, Project Manager
Ryan Osako, Graphic Artist

Archaeological/Historical Consultants

Cultural and Tribal Cultural Resources Consultants

Hexagon Transportation Consultants, Inc.

Transportation Consultants

Illingworth & Rodkin, Inc.

Acoustical & Air Quality Consultants

SECTION 7.0 ACRONYMS AND ABBREVIATIONS

2017 CAP	Bay Area 2017 Clean Air Plan
AB	Assembly Bill
ABAG	Association of Bay Area Governments
ACM	Asbestos Containing Materials
ADA	Americans with Disabilities Act
AFA	Acre-Feet Annually
AICP	American Institute of Certified Planners
ALUCP	Airport Land Use Compatibility Plan
APN	Assessor Parcel Number
BAAQMD	Bay Area Air Quality Management District
BART	Bay Area Rapid Transit
Basin Plan	Water Quality Control Plan for the San Francisco Bay Basin
Bgs	Below the ground surface
BIA	California Building Industry Association
BMPs	Best Management Practices
Btu	British thermal units
CA	California
CalARP	California Accidental Release Prevention
Cal Fire	California Department of Forestry and Fire Protection
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CALGreen	California Green Building Standards Code
Caltrans	California Department of Transportation
Cal/OSHA	California Occupational Safety and Health Administration
CARB	California Air Resources Board
CBC	California Building Standards Code
C/CAG	San Mateo City and County Association of Governments
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act

CFCs	Chlorofluorocarbons
CFR	Code of Federal Regulations
CGS	California Geological Survey
CH ₄	Methane
CHPS	Collaborative for High-Performance Schools
CLUP	San Mateo Comprehensive Land Use Plan
CNEL	Community Noise Equivalent Level
CO	Carbon monoxide
CO ₂	Carbon dioxide
CO ₂ e	Carbon dioxide equivalent
CRECs	Controlled Recognized Environmental Conditions
CRHR	California Register of Historical Resources
dBA	A-weighted decibel
DNL	Day-Night Level
DPM	Diesel particulate matter
DTSC	Department of Toxic Substances Control
EIR	Environmental Impact Report
EPA	U.S. Environmental Protection Agency
ESA	Environmental Site Assessment
EZRI	Earthquake Zones of Required Investigation
FAA	Federal Aviation Administration
FAR	Federal Aviation Regulations
FEMA	Federal Emergency Management Agency
FHSZs	Fire Hazard Severity Zones
FIRM	Flood Insurance Rate Maps
FMMP	Farmland Mapping and Monitoring Program
FTA	United States Department of Transportation's Federal Transit Administration
General Plan	San Bruno General Plan
GHGs	Greenhouse gases
GPD	Gallons per day
GWh	Gigawatt hours
HCP	Habitat Conservation Plan
HFCs	Hydrofluorocarbons

HRECs	Historically Recognized Environmental Conditions
IS	Initial Study
ISO	Insurance Services Office, Inc.
LBP	Lead-Based Paints
LED	Light-Emitting Diode
LEED	Leadership in Energy and Environmental Design
L _{eq}	Equivalent noise level
LID	Low-Impact Development
L _{max}	Maximum A-weighted
LOS	Level of Service
LRA	Local Responsibility Area
MBTA	Migratory Bird Treaty Act
Mgd	Million gallons per day
MM	Mitigation Measure
MND	Mitigated Negative Declaration
Mpg	Miles per gallon
Mph	Miles per hour
MRP	NPDES Permit
MRZs	Mineral Resource Zones
MTC	Metropolitan Transportation Commission
MT CO _{2e}	Metric tons of carbon dioxide equivalent
NAHC	Native American Heritage Commission
NESHAP	National Emission Standards for Hazardous Air Pollutants
NFIP	National Flood Insurance Program
NHPA	National Historic Preservation Act
NOD	Notice of Determination
NOI	Notice of Intent
NO _x	Nitrogen oxides
NO ₂	Nitrogen dioxide
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NWIC	Northwest Information Center
O ₃	Ground-level ozone

OITC	Outdoor/Indoor Transmission Class
OPR	Office of Planning and Research
PCB	Polychlorinated biphenyls
PCE	Perchloroethylene
PG&E	Pacific Gas & Electricity
PM	Particulate matter
PM _{2.5}	Fine particulate matter
PM ₁₀	Coarse particulate matter
PPC	Public Protection Classification
PPV	Peak Particle Velocity
REC	Recognized environmental condition
RHNA	Regional Housing Need Allocation
ROG	Reactive organic gases
RPS	Renewable Portfolio Standards
RWQCB	Regional Water Quality Control Board
SamTrans	San Mateo County Transit District
SSOs	Sanitary Sewer Overflows
SB	Senate Bill
SBGC	San Bruno Garbage Company
SBFD	San Bruno Fire Department
SBPD	San Bruno Police Department
SFHA	Special Flood Hazard Areas
SFO	San Francisco International Airport
SFPUC	San Francisco Public Utilities Commission
SHMA	Seismic Hazards Mapping Act
SMARA	Surface Mining and Reclamation Act
SMCWPPP	San Mateo Countywide Water Pollution Prevention Program
SMBG	State Mining and Geology Board
SO _x	Sulfur oxides
SR	State Route
SRA	State Responsibility Area
SSF/SB WQCP	South San Francisco-San Bruno Water Quality Control Plant
STC	Sound Transmission Class

SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TACs	Toxic air contaminants
TCR	Tribal Cultural Resources
TDM	Transportation Demand Management
TIA	Transportation Impact Analysis
USACE	United States Army Corps of Engineers
USFWS	United States Fish and Wildlife Service
UST	Underground storage tank
VHFHSZs	Very High Fire Hazard Severity Zones
VMT	Vehicle Miles Traveled
VOCs	Volatile Organic Compounds

Exhibit B

Mitigation Monitoring and Reporting Program (MMRP)

DRAFT MITIGATION MONITORING AND REPORTING PROGRAM

2023-2031 Housing Element Update

CITY OF SAN BRUNO

December 2022

P R E F A C E

Section 21081 of the California Environmental Quality Act (CEQA) requires a Lead Agency to adopt a Mitigation Monitoring and Reporting Program 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 Initial Study for the *2023-2031 Housing Element Update* concluded that the implementation of the project could result in significant effects on the environment and mitigation measures were incorporated into the proposed project or are required as a condition of project approval. This Mitigation Monitoring and Reporting Program addresses those measures in terms of how and when they will be implemented.

This document does *not* discuss those subjects for which the Initial Study concluded that the impacts from implementation of the project would be less than significant and for which no mitigation measures would be required.

MITIGATION MONITORING AND REPORTING PROGRAM SAN BRUNO HOUSING ELEMENT UPDATE PROJECT			
Mitigation	Method of Compliance Or Mitigation Action	Timing of Compliance	Oversight Responsibility
<i>Mitigation Measures</i>			
AIR QUALITY			
<p>MM AIR-3.1: Prior to approval, the 2023-2031 Housing Element shall include a policy requiring future development at all Housing Opportunity Sites to implement the following measures during demolition and construction:</p> <ul style="list-style-type: none"> a. Use Tier 4 engines for all off-road equipment greater than 50 horsepower (hp) and operating for more than 20 total hours over the entire duration of construction activities. b. Use diesel trucks with 2010 or later compliant model year engines during construction. c. Use renewable diesel during construction. d. Use low-VOC coatings during construction. e. Implement BAAQMD best management practices and if necessary, enhanced measures recommended by BAAQMD. f. Use portable electrical equipment where commercially available and practicable to complete construction. Construction contractors shall utilize electrical grid power instead of diesel generators when (1) grid power is available at the construction site; (2) when construction of temporary power lines are not necessary in order to provide power to portions of the site distant from existing utility lines; (3) when use of portable extension lines is practicable given construction safety and operational limitations; and (4) when use of electrical grid power does not compromise construction schedules. 	<p>Adopt a policy in the Housing Element Update that would require MM AIR-3.1 be implemented at all Housing Opportunity Sites</p>	<p>Prior to approval of the 2023-2031 Housing Element Update</p>	<p>Community and Economic Development Department – Planning Division</p>

MITIGATION MONITORING AND REPORTING PROGRAM SAN BRUNO HOUSING ELEMENT UPDATE PROJECT			
Mitigation	Method of Compliance Or Mitigation Action	Timing of Compliance	Oversight Responsibility
MM AIR-3.2: Prior to approval, the 2023-2031 Housing Element shall include a policy requiring future development at all Housing Opportunity Sites to conduct a construction and operational health risk assessment (HRA) prior to the issuance of discretionary permits that would allow demolition or construction activities to take place (whichever occurs first). If the HRA demonstrates, to the satisfaction of the City, that the health risk exposures for adjacent receptors will be less than BAAQMD project-level thresholds, then additional mitigation would be unnecessary. However, if the HRA demonstrates that health risks would exceed BAAQMD project level thresholds, additional feasible on- and off-site mitigation shall be analyzed to further reduce risks to the greatest extent practicable.	Adopt a policy in the Housing Element Update that would require future development at all Housing Opportunity Sites to conduct a construction and operational health risk assessment (HRA) prior to the issuance of discretionary permits.	Prior to approval of the 2023-2031 Housing Element Update	Community and Economic Development Department – Planning Division
BIOLOGICAL RESOURCES			
MM BIO-1.1: Prior to approval, the 2023-2031 Housing Element shall include a policy requiring future development at Housing Opportunity Sites to comply with the following measures: <ul style="list-style-type: none"> a. Demolition and nesting substrate (e.g., trees, bushes, grasses, and other vegetation) removal activities shall be scheduled to avoid nesting season (February 1 to August 31). To the extent feasible, construction activities shall be scheduled to occur during the non-nesting season (September 1 through January 31). b. Prior to issuance of any discretionary permits that would allow construction activities during the nesting season, a qualified biologist shall complete pre-construction surveys for active nests within 14 days of work commencing. The survey area must include the proposed development area and all areas within 300 feet of the development area boundary (“zone of influence”). If active nest, 	Adopt a policy in the Housing Element Update that would require future development implement MM BIO-1.1 during demolition and construction activities.	Prior to approval of the 2023-2031 Housing Element Update	Community and Economic Development Department – Planning Division

**MITIGATION MONITORING AND REPORTING PROGRAM
SAN BRUNO HOUSING ELEMENT UPDATE PROJECT**

Mitigation	Method of Compliance Or Mitigation Action	Timing of Compliance	Oversight Responsibility
<p>roost, or burrow sites are identified within the zone of influence, a no-disturbance buffer shall be established for all active nest sites prior to commencement of any proposed construction-related activities to avoid disturbances to migratory bird nesting activities. A no-disturbance buffer constitutes a zone in which construction activities cannot occur. The sizes of the buffers shall be determined by a qualified biologist based on the species, activities proposed near the nest, and topographic and other visual barriers. Buffers shall remain in place until the young have departed the area or fledged and/or the nest is inactive, as determined by the qualified biologist.</p> <p>c. If work is necessary within a buffer zone of an active bird nest, work may occur under the supervision of a qualified avian biologist. The qualified avian biologist monitoring the construction work shall have the authority to stop work and adjust buffers if any disturbance to nesting activity is observed.</p>			
CULTURAL RESOURCES			
<p>MM CUL-1.1: Prior to approval, the 2023-2031 Housing Element shall include a policy requiring future development at Housing Opportunity Site 14 to comply with the following measures:</p> <p>a. Removal or alteration of the commemorative features of California Historic Landmark #934 shall be prohibited, and must be incorporated into any future development proposals for Site 14.</p> <p>b. As part of the future project-level CEQA analysis of any discretionary permit that would allow the demolition of the existing buildings located at Site 14, a Historic Resource Evaluation (HRE) shall be prepared by a qualified architect or architectural historian approved by the City and meeting the Secretary of the Interior's</p>	<p>Adopt a policy in the Housing Element Update that would require future development implement MM CUL-1.1 prior to demolition of any existing buildings at Site 14.</p>	<p>Prior to approval of the 2023-2031 Housing Element Update</p>	<p>Community and Economic Development Department – Planning Division</p>

MITIGATION MONITORING AND REPORTING PROGRAM SAN BRUNO HOUSING ELEMENT UPDATE PROJECT			
Mitigation	Method of Compliance Or Mitigation Action	Timing of Compliance	Oversight Responsibility
<p>Professional Qualifications Standards published in the Code of Federal Regulations (36 CFR part 61). The HRE shall evaluate whether any of the existing buildings meet the definition of a historic resource pursuant to CEQA Guidelines Section 15064.5. If the existing buildings do not meet the definition of a historic resource, demolition may proceed. If the HRE finds that any of the existing buildings at Site 14 meet the definition of a historic resource, demolition of buildings eligible for listing as a historic resource shall be prohibited.</p> <p>c. In the event that any buildings meeting the definition of a historic resource pursuant to CEQA Guidelines Section 15064.5 are identified, future development proposals for Site 14 shall be reviewed for compliance by a qualified architect or architectural historian approved by the City and meeting the Secretary of the Interior's Professional Qualifications Standards published in the Code of Federal Regulations (36 CFR part 61) with one or both of the following standards prior to issuance of any discretionary permits that would allow modifications to the existing buildings or new construction on Site 14:</p> <ul style="list-style-type: none"> • Secretary of Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings; or • Secretary of Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), Weeks and Grimmer. 			

MITIGATION MONITORING AND REPORTING PROGRAM SAN BRUNO HOUSING ELEMENT UPDATE PROJECT			
Mitigation	Method of Compliance Or Mitigation Action	Timing of Compliance	Oversight Responsibility
<p>MM CUL-2.1: Prior to approval, the 2023-2031 Housing Element shall include a policy requiring future development at Housing Opportunity Sites 6, 8, 10, 16, 18, and 19 to comply with the following measures:</p> <ul style="list-style-type: none"> a. If evidence of an archaeological site or other suspected cultural resource as defined by CEQA Guideline Section 15064.5, including darkened soil representing past human activity (“midden”), that could conceal material remains (e.g., worked stone, worked bone, fired clay vessels, faunal bone, hearths, storage pits, or burials) is discovered during construction related earth-moving activities, all ground-disturbing activity within 100 feet of the resources shall be halted and the City Planning Manager shall be notified. The project sponsor shall hire a qualified archaeologist to conduct a field investigation. The City’s Planning Manager shall consult with the archaeologist to assess the significance of the find. Impacts to any significant resources shall be mitigated to a less-than-significant level through data recovery or other methods determined adequate by a qualified archaeologist and that are consistent with the Secretary of the Interior’s Standards for Archaeological documentation. Any identified cultural resources shall be recorded on the appropriate DPR 523 (A-J) form and filed with the NWIC. b. Prior to the initiation of any site preparation and/or the start of construction, the project sponsor shall ensure that all construction workers receive training overseen by a qualified professional archaeologist who is experienced in teaching non-specialists, to ensure that contractors can recognize archaeological resources in the event that any are discovered during construction. 	<p>Adopt a policy in the Housing Element Update that would require future development at Housing Opportunity Sites 6, 8, 10, 16, 18, and 19 prior to and during construction activities.</p>	<p>Prior to approval of the 2023-2031 Housing Element Update</p>	<p>Community and Economic Development Department – Planning Division</p>

MITIGATION MONITORING AND REPORTING PROGRAM SAN BRUNO HOUSING ELEMENT UPDATE PROJECT			
Mitigation	Method of Compliance Or Mitigation Action	Timing of Compliance	Oversight Responsibility
<p>MM CUL-2.2: Prior to approval, the 2023-2031 Housing Element shall be amended to include a policy requiring future development at Housing Opportunity Site 14 to comply with the following measures:</p> <ul style="list-style-type: none"> a. As part of the future project-level CEQA analysis of any discretionary permits that would allow ground-disturbing activities (e.g., grading, trenching, excavation, etc.) in the archaeological sensitive areas shown on Figure 4.5 1, exploratory trenching shall be conducted by a qualified archaeologist trained in both local prehistoric and historical archaeology within the proposed area of effect to determine if prehistoric- or historic-era archaeological resources are present. Explorations shall consist of at least one mechanically dug trench with excavation depths commensurate with the depth of proposed ground-disturbing activities. If any archaeological resources are exposed, these should be briefly documented, tarped for protection, and left in place. The results of the exploratory trenching shall be submitted to the Director of Community and Economic Development or the Director's designee. If it is determined by the project archaeologist that the proposed activities could damage an archaeological resource or that indications of other suspected archaeological resources are present (i.e., darkened soil "midden" representing past human activity), an Archaeological Resources Treatment Plan shall be prepared as described in MM CUL-2.1b below. b. If recommended by the project archaeologist, an Archaeological Resources Treatment Plan shall be prepared by the project archaeologist that contains, at minimum: 	<p>Adopt a policy in the Housing Element Update that would require future development at Housing Opportunity Site 14 to conduct exploratory trenching consistent with MM CUL-2.2.</p>	<p>Prior to approval of the 2023-2031 Housing Element Update</p>	<p>Community and Economic Development Department – Planning Division</p>

MITIGATION MONITORING AND REPORTING PROGRAM SAN BRUNO HOUSING ELEMENT UPDATE PROJECT			
Mitigation	Method of Compliance Or Mitigation Action	Timing of Compliance	Oversight Responsibility
<ul style="list-style-type: none"> • Identification of the scope of work and range of subsurface effects (including location map and development plan), including requirements for preliminary field investigations. • Description of the environmental setting (past and present) and the historic/prehistoric background of the parcel (potential range of what might be found). • Monitoring schedules and individuals • Development of research questions and goals to be addressed by the investigation (what is significant vs. what is redundant information). • Detailed field strategy to record, recover, or avoid the finds and address research goals. • Analytical methods. Report structure and outline of document contents. • Disposition of the artifacts. • Security approaches or protocols for finds. • Appendices: all site records, correspondence, and consultation with Native Americans, etc. <p>Implementation of the treatment plan by the project archaeologist shall be required prior to the issuance of any permits related to ground-disturbing activities. The treatment plan shall utilize data recovery methods to reduce impacts on subsurface resources. The treatment plan shall be submitted to the Director of Community and Economic Development or the Director's designee, along with a summary of the outcomes of the treatment plan and all associated documentation and recordation.</p>			

MITIGATION MONITORING AND REPORTING PROGRAM SAN BRUNO HOUSING ELEMENT UPDATE PROJECT			
Mitigation	Method of Compliance Or Mitigation Action	Timing of Compliance	Oversight Responsibility
<p>MM CUL-2.3: Prior to approval, the 2023-2031 Housing Element shall include a policy requiring future development at Housing Opportunity Site 14 to comply with the following measures:</p> <ul style="list-style-type: none"> a. Prior to the issuance of any discretionary permits that would allow ground-disturbing activities (e.g., grading, trenching, excavation, etc.) within the non-sensitive areas mapped on Figure 4.5 1, the project applicant shall hire a qualified archaeologist to develop a Worker's Environmental Awareness Program (WEAP) to train the construction crew on the legal requirements for the treatment of cultural resources as well as procedures to follow in the event of a cultural resources discovery. This training program shall be given to the crew before ground disturbing work commences and shall include handouts to be given to new workers. b. The applicant shall note on all construction plans that require ground disturbing activities that there is a potential for exposing buried cultural resources including prehistoric Native American burials. c. In the event that potentially significant archaeological resources are encountered during ground-disturbing activities occurring at Site 14, all activity within a 50-foot radius of the find shall be stopped, the Director of Community and Economic Development or the Director's designee shall be notified, and the project archaeologist shall examine the find. The project archaeologist shall (1) evaluate the find(s) to determine if they meet the definition of an archaeological resource; and (2) make appropriate recommendations regarding the disposition of such finds prior to issuance of building permits. Recommendations could include collection, recordation, and analysis of any significant cultural 	<p>Adopt a policy in the Housing Element Update that would require future development at Housing Opportunity Site 14 to implement MM CUL-2.3 prior to the issuance of any discretionary permits.</p>	<p>Prior to approval of the 2023-2031 Housing Element Update</p>	<p>Community and Economic Development Department – Planning Division</p>

MITIGATION MONITORING AND REPORTING PROGRAM SAN BRUNO HOUSING ELEMENT UPDATE PROJECT			
Mitigation	Method of Compliance Or Mitigation Action	Timing of Compliance	Oversight Responsibility
materials. A report of findings documenting any data recovery shall be submitted to the Director of Community and Economic Development or the Director's designee and the Northwest Information Center (if applicable).			
<p>MM CUL-3.1: Prior to approval, the 2023-2031 Housing Element shall include a policy requiring future development at Housing Opportunity Sites 1, 2, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 20, 22 and 23 to comply with the following measures:</p> <p>a. If human remains are discovered at any project construction site during any phase of construction, all ground-disturbing activity within 100 feet of the resources shall be halted and the City's Planning Manager and the San Mateo County Coroner shall be notified immediately, according to Section 5097.98 of the State Public Resources Code and Section 7050.5 of California's Health and Safety Code. If the remains are determined by the County coroner to be Native American, the Native American Heritage Commission (NAHC) shall be notified within 24 hours, and the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains. The project sponsor shall also retain a professional archaeologist with Native American burial experience to conduct a field investigation of the specific site and consult with the Most Likely Descendant, if any, identified by the NAHC. As necessary, the archaeologist may provide professional assistance to the Most Likely Descendant, including the excavation and removal of the human remains. The City of San Bruno shall be responsible for approval of recommended mitigation as it deems appropriate, taking account of the provisions of State law, as set forth in CEQA Guidelines section 15064.5(e) and Public Resources Code section</p>	Adopt a policy in the Housing Element Update that would require future development at Housing Opportunity Sites 1, 2, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 20, 22 and 23 halt all ground-disturbing activities within 100 feet of any discovered resource, consistent with MM CUL-3.1.	Prior to approval of the 2023-2031 Housing Element Update	Community and Economic Development Department – Planning Division

MITIGATION MONITORING AND REPORTING PROGRAM SAN BRUNO HOUSING ELEMENT UPDATE PROJECT			
Mitigation	Method of Compliance Or Mitigation Action	Timing of Compliance	Oversight Responsibility
5097.98. The project sponsor shall implement approved mitigation, to be verified by the City of San Bruno, before the resumption of ground-disturbing activities within 100 feet of where the remains were discovered.			
GREENHOUSE GAS EMISSIONS			
MM GHG-1.1: Prior to approval, the 2023-2031 Housing Element shall include a policy requiring applicants and their contractors to implement the following measures prior to and during construction: <ul style="list-style-type: none"> a. Prior to issuance of any discretionary permits that would allow demolition or construction (grading, excavation, building, etc.) activities at the Housing Opportunity Sites, the applicant shall submit a construction management plan that demonstrates that: <ul style="list-style-type: none"> • Alternative fueled (e.g. biodiesel, electric) construction vehicles/equipment shall make up at least 15 percent of the fleet; • Buildings shall be constructed with local building materials of at least 10 percent (sourced from within 100 miles of the City limits); and • Contractors shall recycle and reuse at least 50 percent of construction waste or demolition materials. 	Adopt a policy in the Housing Element Update that would require future development submit a construction management plan prior to the issuance of any discretionary permit, consistent with MM GHG-1.1.	Prior to approval of the 2023-2031 Housing Element Update	Community and Economic Development Department – Planning Division
MM GHG-1.2: Prior to approval, the 2023-2031 Housing Element shall include a policy requiring future development at all Housing Opportunity Sites to demonstrate adherence with the following design measures prior to issuance of any discretionary permits that would allow construction of residential units: <ul style="list-style-type: none"> a. Construction of natural gas infrastructure and the use of natural gas appliances shall be prohibited; 	Adopt a policy in the Housing Element Update that would prohibit the construction of natural gas and use of natural gas appliance, require	Prior to approval of the 2023-2031 Housing Element Update	Community and Economic Development Department – Planning Division

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Mitigation	Method of Compliance Or Mitigation Action	Timing of Compliance	Oversight Responsibility
<ul style="list-style-type: none"> b. Future developments shall include all electric appliances; c. At a minimum, future development shall comply with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2 requirements. 	all electric appliances, and comply with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2 requirements.		
HAZARDS AND HAZARDOUS MATERIALS			
<p>MM HAZ-2.1: Prior to approval, the 2023-2031 Housing Element shall include a policy requiring future development at Housing Opportunity Sites 6, 8, 10, 16, 18, and 19 to comply with the following measure:</p> <ul style="list-style-type: none"> a. The City shall require a Phase I Environmental Site Assessment (Phase I ESA) prior to issuance of any discretionary permits that would allow ground-disturbing activities, with a Phase II ESA also required if the Phase I ESA indicates evidence of potential site contamination. The City shall also require compliance with the site assessment(s) and any remediation, removal, and disposal requirements for soil, surface water, and/or groundwater contamination enforced by the Department of Toxic Substances Control (DTSC), Regional Water Quality Control Board (RWQCB), San Mateo County Department of Environmental Health (SMCEHS), California Division of Occupational Safety and Health (CalOSHA), U.S. Environmental Protection Agency (EPA), and other jurisdictional agencies. 	Adopt a policy in the Housing Element Update that would require future development at Housing Opportunity Sites 6, 8, 10, 16, 18, and 19 prepare a Phase I ESA prior to the issuance of any discretionary permits.	Prior to approval of the 2023-2031 Housing Element Update	Community and Economic Development Department – Planning Division

MITIGATION MONITORING AND REPORTING PROGRAM SAN BRUNO HOUSING ELEMENT UPDATE PROJECT			
Mitigation	Method of Compliance Or Mitigation Action	Timing of Compliance	Oversight Responsibility
<p>MM HAZ-2.2: Prior to approval, the 2023-2031 Housing Element shall include a policy requiring future development at Housing Opportunity Site 14 to comply with the following measures:</p> <ul style="list-style-type: none"> a. Prior to the issuance of any discretionary permits that would allow ground-disturbing activities on Site 14 (outside of the area shown on Figure 4.9 1), the project proponent shall obtain a Phase I Environmental Site Assessment (ESA). The Phase I ESA shall be conducted in accordance with the United States Environmental Protection Agency’s All Appropriate Inquiries (AAI) Rule and the latest American Society for Testing and Materials (ASTM International) guidelines, and identify all potential subsurface contaminants warranting further investigation. b. If the Phase I ESA identifies any potential contaminants warranting further investigation, a Phase II ESA shall be prepared in accordance with the United States Environmental Protection Agency’s AAI Rule and the latest ASTM International guidelines. As part of the Phase II, a qualified environmental professional (as defined in Title 40 of the California Code of Regulations) shall take soil, soil vapor, and groundwater samples as determined necessary by the environmental professional in the area of proposed disturbance at 0.5 feet below ground surface (bgs) to the maximum proposed depth of disturbance. Collected soil samples shall be tested for all potential contaminants identified in the Phase I ESA to determine if contaminants exceed California Division of Occupational Safety and Health (Cal/OSHA) exposure limits or San Mateo County Environmental Health Services (SMCEHS) environmental screening levels for residential uses. 	<p>Adopt a policy in the Housing Element Update that would require future development at Housing Opportunity Site 14 to prepare a Phase I ESA prior to the issuance of any discretionary permits. If the Phase I ESA identifies potential concerns, a Phase II ESA would be prepared.</p>	<p>Prior to approval of the 2023-2031 Housing Element Update</p>	<p>Community and Economic Development Department – Planning Division</p>

MITIGATION MONITORING AND REPORTING PROGRAM SAN BRUNO HOUSING ELEMENT UPDATE PROJECT			
Mitigation	Method of Compliance Or Mitigation Action	Timing of Compliance	Oversight Responsibility
<p>c. The results of the Phase II ESA shall be provided SMCEHS department. If determined necessary by the SMCEHS, a Redevelopment Management Plan (RMP) or equivalent shall be prepared and submitted to the SMCEHS and the Director of Community and Economic Development or the Director's designee that includes 1) an evaluation of whether redevelopment activities will create new exposure pathways to human health and the environment that pose unacceptable risks, and, if so, how those risks will be mitigated, and 2) a discussion of how contaminated media will be handled and disposed during construction activities. Once approved by the SMCEHS and Community and Economic Development Department, the RMP or equivalent shall be implemented by a qualified environmental professional. The results of the RMP or equivalent shall be submitted to the SMCEHS and the Director of Community and Economic Development or the Director's designee prior to the issuance of any issuance of any discretionary permits (e.g., grading, construction, occupancy, whichever occurs first).</p>			
<p>MM HAZ-5.1: Prior to approval, the 2023-2031 Housing Element shall include a policy requiring future development at Housing Opportunity Site 14 to comply with the following measures:</p> <p>a. Prior to the issuance of any construction or building permits, the applicant shall submit a plan with a list of equipment to be used during construction that includes their height and proposed area of operation to the Director of Community and Economic</p>	<p>Adopt a policy in the Housing Element Update that would require future development at Housing Opportunity Site 14 to submit a plan that details the type and location of</p>	<p>Prior to approval of the 2023-2031 Housing Element Update</p>	<p>Community and Economic Development Department – Planning Division</p>

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Mitigation	Method of Compliance Or Mitigation Action	Timing of Compliance	Oversight Responsibility
<p>Development or the Director's designee. The use of equipment in locations where it would penetrate critical aeronautical surfaces shall be expressly prohibited by any construction or building permits issued. The plan sets shall include a page depicting the critical aeronautical surfaces on-site, a list of all equipment with heights of 55 feet or greater and their respective heights, and informs construction workers that the use of equipment with heights that would penetrate critical aeronautical surfaces is prohibited.</p> <p>b. Future development at Housing Opportunity Site 14 shall comply with Policy AP-3 of the Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport (ALUCP). Buildings with heights in excess of the applicable critical aeronautical surface as shown in Exhibit IV-17 at Housing Opportunity Site 14 shall be prohibited unless the Federal Aviation Administration determines the proposed building height is not a hazard to air navigation in an aeronautical study prepared pursuant to the filing of Form 7460-1. Proof of compliance with Policy AP-3 of the ALUCP shall be provided to the Director of Community and Economic Development or the Director's designee prior to issuance of any construction or building permits.</p>	<p>construction equipment. In addition, all plans shall include a page depicting the critical aeronautical surfaces on-site, a list of all equipment with heights of 55 feet or greater and their respective heights, and informs construction workers that the use of equipment with heights that would penetrate critical aeronautical surfaces is prohibited.</p>		
NOISE			
<p>MM NOI-2.1: Prior to approval, the 2023-2031 Housing Element shall include a policy requiring future development at all Housing Opportunity Sites to implement the following measures during demolition and construction:</p>	<p>Adopt a policy in the Housing Element Update that would require future development at all Housing Opportunity</p>	<p>Prior to approval of the 2023-2031 Housing Element Update</p>	<p>Community and Economic Development Department – Planning Division</p>

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Mitigation	Method of Compliance Or Mitigation Action	Timing of Compliance	Oversight Responsibility
<ul style="list-style-type: none"> • Groundborne vibration studies shall be prepared by qualified professionals in accordance with industry-accepted methodology where heavy construction activities involving significant site grading, underground, or foundation work will occur within 25 feet of residential or other vibration sensitive uses. The industry-accepted methodologies include the recommended vibration assessment procedure and thresholds provided by public agencies such as Caltrans or the Federal Highway Administration. The studies should identify necessary construction vibration controls to reduce both human annoyance and the possibility of cosmetic damage. Controls shall include, but not be limited to, the following measures: <ul style="list-style-type: none"> ○ A list of all heavy construction equipment to be used for this project known to produce high vibration levels (tracked vehicles, vibratory compaction, jackhammers, hoe rams, etc.) shall be submitted to the City by the contractor. This list shall be used to identify equipment and activities that would potentially generate substantial vibration and to define the level of effort for reducing vibration levels below the thresholds. ○ Place operating equipment on the construction site as far as possible from vibration-sensitive receptors. ○ Use smaller equipment to minimize vibration levels below the limits. ○ Avoid using vibratory rollers and tampers near sensitive areas. ○ Select demolition methods not involving impact tools. 	<p>Sites prepare groundborne vibration studies.</p>		

MITIGATION MONITORING AND REPORTING PROGRAM SAN BRUNO HOUSING ELEMENT UPDATE PROJECT			
Mitigation	Method of Compliance Or Mitigation Action	Timing of Compliance	Oversight Responsibility
<ul style="list-style-type: none"> ○ Modify/design or identify alternative construction methods to reduce vibration levels below the limits. ○ Avoid dropping heavy objects or materials. 			
TRANSPORTATION			
MM TRN-1.1: Prior to approval, the 2023-2031 Housing Element shall include a policy requiring future development at all Housing Opportunity Sites that would generate a sufficient amount of trips according to the City’s traffic analysis guidelines or otherwise warrant analysis as determined by the City to prepare a Transportation Analysis (TA) prior to the issuance of any discretionary permits. Prior to the preparation of the TA, a scope of work outlining the proposed approach to the TA shall be submitted to the Director of Public Works or the director’s designee for review and approval. The TA, at a minimum, shall evaluate the proposed development for consistency with the City’s General Plan and Walk ‘N Bike Plan, review the proposed layout for any geometric design features that may increase hazards (e.g., sight distances, turning radii, etc.), and verify adequate emergency access is provided. The TA shall provide recommendations addressing any identified inconsistencies, geometric design hazards, or emergency access issues that shall be incorporated into the final design. The TA shall be prepared in accordance with Public Works’ guidance and submitted prior to the approval of any discretionary permits as part of the project-level review of all future development under the Housing Element Update.	Adopt a policy in the Housing Element Update that would require future development at all Housing Opportunity Sites that would generate a sufficient amount of trips according to the City’s traffic analysis guidelines or otherwise warrant analysis as determined by the City to prepare a Transportation Analysis (TA) prior to the issuance of any discretionary permits.	Prior to approval of the 2023-2031 Housing Element Update	Community and Economic Development Department – Planning Division

SOURCE: City of San Bruno, *2023-2031 Housing Element Update Initial Study*, December 2022.

RESOLUTION NO. 2023 - 02

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF SAN BRUNO RECOMMENDING THAT THE CITY COUNCIL ADOPT A GENERAL PLAN AMENDMENT TO REPEAL THE 2015-2023 HOUSING ELEMENT AND ADOPT THE HOUSING ELEMENT OF THE GENERAL PLAN FOR THE PERIOD OF 2023-2031, AND FIND THE HOUSING ELEMENT IN SUBSTANTIAL COMPLIANCE WITH STATE HOUSING ELEMENT LAW, ADOPT A GENERAL PLAN AMENDMENT TO POLICY HS-40, AND AUTHORIZE STAFF TO SUBMIT THE HOUSING ELEMENT UPDATE TO THE CALIFORNIA DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT FOR CERTIFICATION

WHEREAS, the California legislature has found that “California has a housing supply and affordability crisis of historic proportions. The consequences of failing to effectively and aggressively confront this crisis are hurting millions of Californians, robbing future generations of the chance to call California home, stifling economic opportunities for workers and businesses, worsening poverty and homelessness, and undermining the state’s environmental and climate objectives.” (Gov. Code Section 65589.5.); and

WHEREAS, the legislature has further found that “Among the consequences of those actions are discrimination against low-income and minority households, lack of housing to support employment growth, imbalance in jobs and housing, reduced mobility, urban sprawl, excessive commuting, and air quality deterioration.” (Gov. Code Section 65589.5.); and

WHEREAS, the legislature adopted the Housing Crisis Act of 2019 (SB 330) which states that “In 2018, California ranked 49th out of the 50 states in housing units per capita... California needs an estimated 180,000 additional homes annually to keep up with population growth, and the Governor has called for 3.5 million new homes to be built over 7 years”; and

WHEREAS, State Housing Element Law (Government Code Sections 65580 et seq.) requires that the City Council adopt a Housing Element for the eight-year period 2023-2031 to accommodate the City of San Bruno’s (City) regional housing need allocation (RHNA) of 3,165 housing units, comprised of 704 very-low-income units, 405 low-income units, 573 moderate-income units, and 1,483 above moderate-income units; and

WHEREAS, State law requires that the City take meaningful steps to promote and affirmatively further fair housing (Gov. Code Section 65583(c)(5)); and

WHEREAS, State law requires that the City make zoning available for all types of housing, including multifamily housing (Gov. Code Sections 65583.2 and 65583(c)); and

WHEREAS, the proposed 2023-2031 Housing Element will replace the existing 2015-2023 Housing Element and serve as the City of San Bruno's guiding policy document for meeting the City's future housing needs at all economic levels; and

WHEREAS, as provided in Government Code Sections 65352 – 65352.5 San Bruno referred the Housing Element to all California Native American tribes on the contact list provided by the Native American Heritage Commission and to other entities listed; and

WHEREAS, no California Native American tribe requested consultation; and

WHEREAS, the preparation, adoption, and implementation of the Housing Element requires a diligent effort to include all economic segments of the community; and

WHEREAS, the City conducted extensive community outreach over the last 24 months outreach occurred, including public meetings before the Planning Commission and City Council; and

WHEREAS, on May 24, 2022, the first draft of the Housing Element was published on the City's website and made available for a 30-day public review period that closed on June 24, 2022, and the city considered public comments on the draft during a 10-day review period after the close of the comment period before submittal to the State Department of Housing and Community Development (HCD) for its review; and

WHEREAS, on July 8, 2022, the City submitted the draft Housing Element to the State Department of Housing and Community Development (HCD) for its 90-day review; and

WHEREAS, in September 2022, City staff contacted HCD to discuss preliminary feedback regarding the adequacy of the draft Housing Element, and based upon this conversation, City staff revised the draft Housing Element to include additional information and data; and

WHEREAS, on October 6, 2022, the City received a letter from HCD stating that the revised draft Housing Element was not in compliance with State Housing Element Law, and further changes were needed to bring it into compliance with State Housing Element Law before it is certified by HCD in accordance with Government Code Section 65585; and

WHEREAS, the City has considered the comments in HCD's October 6, 2022 letter, and has made revisions to the draft Housing Element to address those comments; and,

WHEREAS, on December 30, 2022, the City published a revised draft Housing Element responding to HCD's findings and requested public comment on the draft; and

WHEREAS, on January 12, 2023, the Planning Commission conducted a duly noticed public hearing, reviewed the proposed 2023-2031 Housing Element, which includes revisions to address HCD's review comments, and all pertinent maps, documents, and exhibits, including the comments made by HCD and public comments, and

WHEREAS, on that same date, the Planning Commission reviewed a companion amendment to Policy HS-40 in the General Plan; and

WHEREAS, on that same date, the Planning Commission considered the Initial Study and Draft Mitigated Negative Declaration, public comments and responses, the application of all mitigation measures and a proposed Mitigation Monitoring and Reporting Program prepared for the 2023-2031 Housing Element update pursuant to the California Environmental Quality Act, and adopted Resolution No. 2023-01 recommending that the City Council adopt the Mitigated Negative Declaration and Mitigation Monitoring and Reporting Program.

NOW, THEREFORE, BE IT RESOLVED that the Planning Commission of the City of San Bruno, based on substantial evidence in the staff reports, written and oral testimony, and exhibits presented, hereby finds as follows:

1. The foregoing recitals are true and correct and are incorporated by reference into this action
2. The proposed General Plan Housing Element text and diagram amendment are consistent with the policies and intent of the General Plan. The proposed Housing Element amendment to the General Plan clarify and improve existing Housing Element policies and objectives and ensure internal consistency between the Housing Element and the Health and Safety Element. Further, the Housing Element amendment ensures consistency between the city's General Plan and State law, and which achieve General Plan policies and objectives for equal access to housing, access to transportation improvement funds, and mixed use, transit-oriented housing opportunities.
3. The proposed General Plan Housing Element amendment is in response to the requirements of the California Government Code to update the Housing Element every eight years. Adoption of an updated Housing Element is critical to address various requirements of State law and certification of the updated Housing Element is important to enhance the City's eligibility for grant funds and to support the City's local land use authority.

The proposed Housing Element Amendment, including amendment of existing Housing Element policies, is in response to extensive public outreach and analysis of housing trends and issues, including fair housing

issues, within the City. As such, the Housing Element Amendment is prepared to address the public's concerns and needs related to housing within the city.

Because several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria, the proposed Housing Element Amendment will facilitate the City's ability to attract new grant funds to improve transportation, infrastructure, open space, and housing. The Housing Element Amendment will help ensure that households seeking different housing types and affordable housing will have opportunities to find housing in San Bruno.

4. The proposed Housing Element Amendment is in the public interest because maintaining consistency with State law requirements ensures that the City General Plan is adequate for City decision making, preserves access to State funding sources and reduces the risk to the community of lawsuits over the adequacy of the General Plan. The attached Exhibit B, which is hereby incorporated by reference, provides substantial evidence demonstrating how each requirement of Housing Element Law is addressed in the proposed Housing Element.
5. Based on substantial evidence in the record the properties listed in the Sites Inventory are located in the City's commercial corridors within proximity to high quality transit, with existing uses that have low building to land value. Furthermore, the City has experienced increased development activity within the TCP as a result of the 2021 rezoning. For these reasons, and based on the additional evidence in the record, existing uses on the non-vacant sites identified in the site inventory to accommodate the RHNA are likely to be discontinued during the planning period and therefore do not constitute an impediment to planned residential development on the site during the planning period. Table 6-6 of the Housing Element, along with other evidence in the record, provides substantial evidence to support the finding that existing uses are likely to be discontinued during the planning period, and is hereby incorporated by reference.
6. As required by Government Code Section 65585(e), the Planning Commission has considered the comments made by the Department of Housing and Community Development included in the Department's letter to the City of San Bruno dated October 6, 2022, consistent with Government Code Section 65585(f), and as described in Exhibit C to this resolution, incorporated herein by this reference, the City has updated the Housing Element in response to the findings of the Department to

substantially comply with the requirements of State Housing Element Law as interpreted by HCD.

7. The Planning Commission, based on the evidence in the record, finds the proposed Housing Element to be in substantial conformance with State law and the General Plan of the City of San Bruno;

BE IT FURTHER RESOLVED, that the Planning Commission hereby recommends 1) that the San Bruno City Council repeal the 2015-2023 Housing Element and adopt a General Plan Amendment for the updated 2023-2031 Housing Element of the General Plan as shown in Exhibit A, incorporated herein by this reference, and 2) that the City Council authorize and direct staff to submit the adopted Housing Element to the California Department of Housing and Community Development for review pursuant to Government Code Section 65585 (g) and to make all non-substantive changes to the Housing Element to make it internally consistent or to address any non-substantive changes or revisions requested by the Department to achieve concurrence that the Housing Element substantially complies with Housing Element Law; and

BE IT FURTHER RESOLVED, that the Planning Commission hereby recommends that the San Bruno City Council amend the General Plan Policy HS-40 as described in Attachment D to this resolution, incorporated herein by this reference.

BE IT FURTHER RESOLVED, that the Planning Commission hereby recommends that the San Bruno City Council incorporate the mitigation policies identified in the MND into the Housing Element as City policies applicable to the development of the sites in the inventory. The Planning Commission also recommended incorporation of additional information to bolster the justifications for development/redevelopment potential of developed sites in the inventory to the extent possible prior to submission to HCD, and that the City Council consider adoption of a jobs to housing ratio-based housing target for the Tanforan site rather than a flat number of units.

1/17/2023

Date

DocuSigned by:
Gerard Madden
10A63454744048B
Planning Commission Chair

ATTEST

DocuSigned by:
Michael Laughlin
3CF523F5668B484...
Planning Commission Secretary

APPROVED AS TO FORM

DocuSigned by:
Trisha Ortiz
6379DD8EEB9E44C...
City Attorney

-o0o-

I, Michael Laughlin, Planning Commission Secretary, do hereby certify that the foregoing Resolution was duly and regularly passed and adopted by the Planning Commission of the City of San Bruno this 12th day of January 2023 by the following vote:

AYES	Commissioners:	Durazo, Biasotti, Harmon, Johnson, Kuhn, Lethin
NOES	Commissioners:	none
ABSENT	Commissioners:	none
RECUSED	Commissioners	Madden

Exhibit A

DRAFT 2023-2031 HOUSING ELEMENT

(DRAFT) Exhibit B

**EVIDENCE IN SUPPORT OF FINDINGS OF
SUBSTANTIAL COMPLIANCE
WITH THE REQUIREMENTS OF
STATE HOUSING ELEMENT LAW**

Column 1 of the table below is populated with sections of the Govt. Code applicable to Housing Element Law, Article 10.6 [65580 – 65589.11]. Column 2 of the table below indicates the section and page number within the San Bruno's 2023-2031 Housing Element update where the information can be found.

GOVERNMENT CODE PROVISION	HOUSING ELEMENT COMPLIANCE
Section 65583	
The housing element shall consist of an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing.	<ul style="list-style-type: none"> • Chapter 1 <ul style="list-style-type: none"> ○ page 3 ○ page 3-4 • Chapter 7 <ul style="list-style-type: none"> ○ pages 1-2 ○ pages 3-32
The housing element shall identify adequate sites for housing, including rental housing, factory-built housing, mobile-homes, and emergency shelters, and shall make adequate provision for the existing and projected needs of all economic segments of the community.	<ul style="list-style-type: none"> • Chapter 3 pages 15-16 • Chapter 6 <ul style="list-style-type: none"> ○ pages 13-16 ○ pages 18-22
The element shall contain all of the following:	
(a) An assessment of housing needs and an inventory of resources and constraints relevant to the meeting of these needs. The assessment and inventory shall include all of the following:	<ul style="list-style-type: none"> • Chapter 3 <ul style="list-style-type: none"> ○ pages 1-30, 35-37 ○ pages 30-35
(a)(1) An analysis of population and employment trends and documentation of projections	<ul style="list-style-type: none"> • Chapter 2 <ul style="list-style-type: none"> ○ pages 1-12 ○ pages 17-26 ○ pages 37-39 • Appendix E
(a)(1) A quantification of the locality's existing and projected housing needs for all income levels, including extremely low-income households, as defined in subdivision (b) of Section 50105 and Section 50106 of the Health and Safety Code. These existing and projected needs shall include the locality's share of the regional housing need in accordance with Section 65584. Local agencies shall calculate the subset of very -low-income households allotted under Section 65584 that qualify as extremely low-income households. The local agency may either use available census data to calculate the percentage of very low-income households that qualify as extremely low-income households or	<ul style="list-style-type: none"> • Chapter 1 pages 3-4 • Chapter 2 <ul style="list-style-type: none"> ○ pages 5-7 ○ page 46 • Chapter 6 <ul style="list-style-type: none"> ○ pages 1-5 ○ pages 23-24

presume that 50 percent of the very low-income households qualify as extremely low-income households. The number of extremely low-income households and very low-income households shall equal the jurisdiction's allocation of very low-income households pursuant to Section 65584.	
(a)(2) An analysis and documentation of household characteristics, including level of payment compared to ability to pay,	<ul style="list-style-type: none"> • Chapter 2 <ul style="list-style-type: none"> ○ pages 12-16, 23-28, 34-59 ○ pages 28-32
(a)(2) housing characteristics, including overcrowding, and	<ul style="list-style-type: none"> • Chapter 2 pages 32-34 • Appendix G pages 5-7,
(a)(2) housing stock condition.	<ul style="list-style-type: none"> • Chapter 2 pages 37-38
(a)(3) An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality's housing need for a designated income level, and an analysis of the relationship of zoning and public facilities and services to these sites, and an analysis of the relationship of the sites identified in the land inventory to the jurisdiction's duty to affirmatively further fair housing. Note: Please see Section 65583.2 regarding the land inventory.	<ul style="list-style-type: none"> • Chapter 3 pages 26-29 • Chapter 4 pages 52-55 • Chapter 6 pages 2-24
[Note that AB 2339 (Chapter 654, Statutes of 2022) amended Section 65583(a)(4). It does not apply to ABAG-area housing elements unless the first draft of the housing element is submitted to ABAG after January 31, 2023, or a draft is submitted after April 1, 2023. Therefore, the sections below include the statutory provisions of Section 65583(a)(4) effective in 2022. Jurisdictions adopting their housing element after January 1, 2023, should describe why AB 2339 is not applicable to them.]	<ul style="list-style-type: none"> • AB 2339 does not apply because the City submitted its first draft Housing Element to HCD on July 8, 2022.
(a)(4)(A) The identification of a zone or zones where emergency shelters are allowed as a permitted use without a conditional use or other discretionary permit. The identified zone or zones shall include sufficient capacity to accommodate the need for emergency shelter identified in paragraph (7), except that each local government shall identify a zone or zones that can accommodate at least one year-round emergency shelter.	<ul style="list-style-type: none"> • Chapter 3 pages 15-16

<p>(a)(4)(A) If the local government cannot identify a zone or zones with sufficient capacity, the local government shall include a program to amend its zoning ordinance to meet the requirements of this paragraph within one year of the adoption of the housing element. The local government may identify additional zones where emergency shelters are permitted with a conditional use permit.</p>	<ul style="list-style-type: none"> Chapter 3 pages 15-16
<p>(a)(4)(A) The local government shall also demonstrate that existing or proposed permit processing, development, and management standards are objective and encourage and facilitate the development of, or conversion to, emergency shelters.</p>	<ul style="list-style-type: none"> Chapter 3 pages 15-16
<p>(a)(4)(A) Emergency shelters may only be subject to those development and management standards that apply to residential or commercial development within the same zone except that a local government may apply written, objective standards that include all of the following:</p> <ul style="list-style-type: none"> (i) The maximum number of beds or persons permitted to be served nightly by the facility. (ii) Sufficient parking to accommodate all staff working in the emergency shelter, provided that the standards do not require more parking for emergency shelters than other residential or commercial uses within the same zone. (iii) The size and location of exterior and interior onsite waiting and client intake areas. (iv) The provision of onsite management. (v) The proximity to other emergency shelters, provided that emergency shelters are not required to be more than 300 feet apart. (vi) The length of stay. (vii) Lighting. (viii) Security during hours that the emergency shelter is in operation. 	<ul style="list-style-type: none"> Chapter 3 pages 15-16
<p>(a)(4)(B) The permit processing, development, and management standards applied under this paragraph shall not be deemed to be discretionary acts within the meaning of the California Environmental Quality Act (Division 13 (commencing with Section 21000) of the Public Resources Code).</p>	<ul style="list-style-type: none"> Chapter 3 pages 15-16
<p>(a)(4)(C) A local government that can demonstrate to the satisfaction of the department the existence of one or more</p>	<ul style="list-style-type: none"> Chapter 3 pages 15-16

emergency shelters either within its jurisdiction or pursuant to a multijurisdictional agreement that can accommodate that jurisdiction's need for emergency shelter identified in paragraph (7) may comply with the zoning requirements of subparagraph (A) by identifying a zone or zones where new emergency shelters are allowed with a conditional use permit.	
(a)(4)(D) A local government with an existing ordinance or ordinances that comply with this paragraph shall not be required to take additional action to identify zones for emergency shelters. The housing element must only describe how existing ordinances, policies, and standards are consistent with the requirements of this paragraph.	<ul style="list-style-type: none"> • Chapter 3 pages 15-16
(a)(5) An analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the types of housing identified in paragraph (1) of subdivision (c), and [Note: The types of housing identified in Section 65583(c)(1) include multifamily rental housing, factory-built housing, mobile homes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing.]	<ul style="list-style-type: none"> • Chapter 3 <ul style="list-style-type: none"> ○ pages 1-30 ○ pages 35-37
(a)(5) for persons with disabilities as identified in the analysis pursuant to paragraph (7),	<ul style="list-style-type: none"> • Chapter 2 pages 39-42
(a)(5) including land use controls,	<ul style="list-style-type: none"> • Chapter 3 pages 2-6
(a)(5) building codes and their enforcement,	<ul style="list-style-type: none"> • Chapter 2 page 57-58 • Chapter 3 <ul style="list-style-type: none"> ○ page 17 ○ page 22 ○ pages 28-29
(a)(5) site improvements,	<ul style="list-style-type: none"> • Chapter 3 pages 21, 26
(a)(5) fees and other exactions required of developers,	<ul style="list-style-type: none"> • Chapter 3 pages 21, 23-25
(a)(5) local processing and permit procedures,	<ul style="list-style-type: none"> • Chapter 3 pages 17-20, 26
(a)(5) and any locally adopted ordinances that directly impact the cost and supply of residential development.	<ul style="list-style-type: none"> • Chapter 3 page 13
(a)(5) The analysis shall also demonstrate local efforts to remove governmental constraints that hinder the locality from meeting its share of the	<ul style="list-style-type: none"> • Chapter 3 pages 12-15

regional housing need in accordance with Section 65584	
(a)(5) and from meeting the need for housing for persons with disabilities, supportive housing, transitional housing, and emergency shelters identified pursuant to paragraph (7).	<ul style="list-style-type: none"> Chapter 3 pages 15-16
(a)(6) An analysis of potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the availability of financing,	<ul style="list-style-type: none"> Chapter 3 pages 16-21
(a)(6) the price of land,	<ul style="list-style-type: none"> Chapter 3 pages 37-38
(a)(6) the cost of construction,	<ul style="list-style-type: none"> Chapter 3 pages 29-30
(a)(6) the requests to develop housing at densities below those anticipated in the analysis required by subdivision (c) of Section 65583.2,	<ul style="list-style-type: none"> Chapter 6 pages 10-11
(a)(6) and the length of time between receiving approval for a housing development and submittal of an application for building permits for that housing development that hinder the construction of a locality's share of the regional housing need in accordance with Section 65584.	<ul style="list-style-type: none"> Chapter 1 pages 3-4 Chapter 3 pages 18-20
(a)(6) The analysis shall also demonstrate local efforts to remove nongovernmental constraints that create a gap between the locality's planning for the development of housing for all income levels and the construction of that housing.	<ul style="list-style-type: none"> Chapter 3 pages 37-38
(a)(7) An analysis of any special housing needs, such as those of the	<ul style="list-style-type: none"> Chapter 2 page 36
(a)(7) elderly;	<ul style="list-style-type: none"> Chapter 2 pages 37-39
(a)(7) persons with disabilities, including a developmental disability, as defined in Section 4512 of the Welfare and Institutions Code;	<ul style="list-style-type: none"> Chapter 2 pages 39-43
(a)(7) large families;	<ul style="list-style-type: none"> Chapter 2 pages 44-45
(a)(7) farmworkers;	<ul style="list-style-type: none"> Chapter 2 pages 51-52
(a)(7) families with female heads of households;	<ul style="list-style-type: none"> Chapter 2 pages 43-44
(a)(7) and families and persons in need of emergency shelter.	<ul style="list-style-type: none"> Chapter 2 pages 46-51
(a)(7) The need for emergency shelter shall be assessed based on the capacity necessary to accommodate the most recent homeless point-in-time count conducted before the start of the planning period, the need for emergency shelter based on number of beds available on a year-round and seasonal basis, the number of shelter beds that go unused on an average monthly basis within a one-year period, and the percentage of	<ul style="list-style-type: none"> Chapter 3 pages 15-16

those in emergency shelters that move to permanent housing solutions.	
(a)(7) The need for emergency shelter may be reduced by the number of supportive housing units that are identified in an adopted 10-year plan to end chronic homelessness and that are either vacant or for which funding has been identified to allow construction during the planning period.	<ul style="list-style-type: none"> • This does not apply because the City does not has not adopted a 10 year plan to reduce homelessness.
(a)(7) An analysis of special housing needs by a city or county may include an analysis of the need for frequent user coordinated care housing services.	<ul style="list-style-type: none"> • This analysis is not included.
(a)(8) An analysis of opportunities for energy conservation with respect to residential development. Cities and counties are encouraged to include weatherization and energy efficiency improvements as part of public7y subsidized housing rehabilitation projects. This may include energy efficiency measures that encompass the building envelope, its heating and cooling systems, and its electrical system.	<ul style="list-style-type: none"> • Chapter 2 pages 57-59 • Chapter 3 page 28
(a)(9) An analysis of existing assisted housing developments that are eligible to change from low-income housing uses during the next 10 years due to termination of subsidy contracts, mortgage prepayment, or expiration of restrictions on use. "Assisted housing developments," for the purpose of this section, shall mean multifamily rental housing that receives governmental assistance under federal programs listed in subdivision (a) of Section 65863.10, state and local multifamily revenue bond programs, local redevelopment programs, the federal Community Development Block Grant Program, or local in-lieu fees. "Assisted housing developments" shall also include multifamily rental units that were developed pursuant to a local inclusionary housing program or used to qualify for a density bonus pursuant to Section 65915.	<ul style="list-style-type: none"> • Chapter 2 pages 55-57
(a)(9)(A) The analysis shall include a listing of each development by project name and address, the type of governmental assistance received, the earliest possible date of change from low-income use, and the total number of elderly and nonelderly units that could be lost from the	<ul style="list-style-type: none"> • Chapter 2 page 57

locality's low-income housing stock in each year during the 10-year period. For purposes of state and federally funded projects, the analysis required by this subparagraph need only contain information available on a statewide basis.	
(a)(9)(B) The analysis shall estimate the total cost of producing new rental housing that is comparable in size and rent levels, to replace the units that could change from low-income use, and an estimated cost of preserving the assisted housing developments. This cost analysis for replacement housing may be done aggregately for each five-year period and does not have to contain a project-by-project cost estimate.	<ul style="list-style-type: none"> This analysis is not required because the City does not have any affordable units at risk of conversion.
(a)(9)(C) The analysis shall identify public and private nonprofit corporations known to the local government that have legal and managerial capacity to acquire and manage these housing developments.	<ul style="list-style-type: none"> Chapter 2 pages 58-59
(a)(9)(D) The analysis shall identify and consider the use of all federal, state, and local financing and subsidy programs that can be used to preserve, for lower income households, the assisted housing developments, identified in this paragraph, including, but not limited to, federal Community Development Block Grant Program funds, tax increment funds received by a redevelopment agency of the community, and administrative fees received by a housing authority operating within the community. In considering the use of these financing and subsidy programs, the analysis shall identify the amounts of funds under each available program that have not been legally obligated for other purposes and that could be available for use in preserving assisted housing developments.	<ul style="list-style-type: none"> Chapter 2 pages 57-58
(b) (1) A statement of the community's goals, quantified objectives, and policies relative to affirmatively furthering fair housing and to the maintenance, preservation, improvement, and development of housing.	<ul style="list-style-type: none"> Chapter 4 Chapter 6 page 23 Chapter 7 Page 17, Program 3-B Chapter 7 Page 20, Program 3-G, 3 Chapter 7 Page 26, AFFH Policy 2
(2) It is recognized that the total housing needs identified pursuant to subdivision (a) may exceed available resources and the community's ability to satisfy this need within the content of the general plan requirements outlined in Article 5 (commencing with Section 65300). Under these	<ul style="list-style-type: none"> Chapter 7

circumstances, the quantified objectives need not be identical to the total housing needs. The quantified objectives shall establish the maximum number of housing units by income category, including extremely low income, that can be constructed, rehabilitated, and conserved over a five-year time period.	
(c) A program that sets forth a schedule of actions during the planning period, each with a timeline for implementation, that may recognize that certain programs are ongoing, such that there will be beneficial impacts of the programs within the planning period, that the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the housing element	<ul style="list-style-type: none"> Chapter 7
(c) through the administration of land use and development controls,	<ul style="list-style-type: none"> Chapter 7
(c) the provision of regulatory concessions and incentives,	<ul style="list-style-type: none"> Chapter 7
(c) the utilization of appropriate federal and state financing and subsidy programs when available,	<ul style="list-style-type: none"> Chapter 7
(c) and the utilization of moneys in a low- and moderate-income housing fund of an agency if the locality has established a redevelopment project area pursuant to the Community Redevelopment Law (Division 24 (commencing with Section 33000) of the Health and Safety Code).	<ul style="list-style-type: none"> Chapter 7
In order to make adequate provision for the housing needs of all economic segments of the community, the program shall do all of the following:	
(c)(1) Identify actions that will be taken to make sites available during the planning period with appropriate zoning and development standards and with services and facilities to accommodate that portion of the city's or county's share of the regional housing need for each income level that could not be accommodated on sites identified in the inventory completed pursuant to paragraph (3) of subdivision (a) without rezoning, and to comply with the requirements of Section 65584.09.	<ul style="list-style-type: none"> Chapter 6
(c)(1) Sites shall be identified as needed to affirmatively further fair housing	<ul style="list-style-type: none"> Chapter 6 pages 15-16 Appendix K

(c)(1) and to facilitate and encourage the development of a variety of types of housing for all income levels, including multifamily rental housing,	<ul style="list-style-type: none"> • Chapter 3 Table 3-4 • Chapter 4 page 52 • Chapter 7 Program 2-G
(c)(1) factory-built housing,	<ul style="list-style-type: none"> • Chapter 3 page 14
(c)(1) mobile homes,	<ul style="list-style-type: none"> • Chapter 3 page 14
(c)(1) housing for agricultural employees,	<ul style="list-style-type: none"> • Chapter 3 page 17
(c)(1) supportive housing,	<ul style="list-style-type: none"> • Chapter 3 page 12-13
(c)(1) single-room occupancy units,	<ul style="list-style-type: none"> • Chapter 3 pages 16-17
(c)(1) emergency shelters,	<ul style="list-style-type: none"> • Chapter 3 pages 15-16
(c)(1) and transitional housing.	<ul style="list-style-type: none"> • Chapter 3 page 12-13
(c)(1)(A) Where the inventory of sites, pursuant to paragraph (3) of subdivision (a), does not identify adequate sites to accommodate the need for groups of all household income levels pursuant to Section 65584, rezoning of those sites, including adoption of minimum density and development standards, for jurisdictions with an eight-year housing element planning period pursuant to Section 65588, shall be completed no later than three years after either the date the housing element is adopted pursuant to subdivision (f) of Section 65585 or the date that is 90 days after receipt of comments from the department pursuant to subdivision (b) of Section 65585, whichever is earlier, unless the deadline is extended pursuant to subdivision (f). Notwithstanding the foregoing, for a local government that fails to adopt a housing element that the department has found to be in substantial compliance with this article within 120 days of the statutory deadline in Section 65588 for adoption of the housing element, rezoning of those sites, including adoption of minimum density and development standards, shall be completed no later than one year from the statutory deadline in Section 65588 for adoption of the housing element.	<ul style="list-style-type: none"> • Chapter 6 <ul style="list-style-type: none"> ○ page 7 ○ table 6-4 page 17
(c)(1)(B) Where the inventory of sites, pursuant to paragraph (3) of subdivision (a), does not identify adequate sites to accommodate the need for groups of all household income levels pursuant to Section 65584, the program shall identify sites that can be developed for housing within the planning period pursuant to subdivision (h) of Section 65583.2. The identification of sites shall include all	<ul style="list-style-type: none"> • Chapter 6 Table 6-6

components specified in Section 65583.2. Note: Please see Section 65583.2 regarding the land inventory and conformance with subdivision (h).	
(c)(1)(C) Where the inventory of sites pursuant to paragraph (3) of subdivision (a) does not identify adequate sites to accommodate the need for farmworker housing, the program shall provide for sufficient sites to meet the need with zoning that permits farmworker housing use by right, including density and development standards that could accommodate and facilitate the feasibility of the development of farmworker housing for low- and very low income households.	<ul style="list-style-type: none"> • Chapter 7 Program 2-G
(c)(2) Assist in the development of adequate housing to meet the needs of extremely low, very low, low-, and moderate-income households.	<ul style="list-style-type: none"> • Chapter 4 page 16 • Chapter 6 pages 24-25 • Chapter 7 pages 10-11, Program 2-F • Chapter 7 page 11, Program 2-G • Chapter 7 page 12, Program 2-H
(c)(3) Address and, where appropriate and legally possible, remove governmental and nongovernmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels	<ul style="list-style-type: none"> • Chapter 3 • Chapter 7 page 6, Program 1-I • Chapter 7 page 10, Program 2-F • Chapter 7 page 11, Program 2-G
(c)(3) and housing for persons with disabilities. The program shall remove constraints to, and provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities.	<ul style="list-style-type: none"> • Chapter 2 pages 42-44 • Chapter 7 page 9, Program 2-D • Chapter 7 page 10, Program 2-F • Chapter 7 page 11, Program 2-G • Chapter 7 page 28, Program 4-M • Chapter 7 page 29, Program 4-O • Chapter 7 pages 30-31, Program 4-Q • Chapter 7 page 31, Program 4-R
(c)(3) Transitional housing and supportive housing shall be considered a residential use of property and shall be subject only to those restrictions that apply to other residential dwellings of the same type in the same zone.	<ul style="list-style-type: none"> • Chapter 3 pages 12-13
(c)(3) Supportive housing, as defined in Section 65650, shall be a use by right in all zones where multifamily and mixed uses are permitted, as provided in Article 11 (commencing with Section 65650).	<ul style="list-style-type: none"> • Chapter 3 pages 12-13
(c)(4) Conserve and improve the condition of the existing affordable housing stock, which may include addressing ways to mitigate the loss of	<ul style="list-style-type: none"> • Chapter 7 page 18, Program 3-E • Chapter 7 page 19, Program 3-G

dwelling units demolished by public or private action.	
(c)(5) Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics protected by the California Fair Employment and Housing Act (Part 2.8 (commencing with Section 12900) of Division 3 of Title 2), Section 65008, and any other state and federal fair housing and planning law.	<ul style="list-style-type: none"> • Chapter 4 • Chapter 7 page 16, Program 3-A • Chapter 7 page 21, Program 4-A • Chapter 7 page 21, Program 4-B • Chapter 7 page 22, Program 4-C • Chapter 7 page 23, Program 4-D • Chapter 7 pages 23-24, Program 4-E • Chapter 7 page 24, Program 4-F • Chapter 7 pages 24-25, Program 4-G • Chapter 7 page 25, Program 4-H • Chapter 7 page 26, Program 4-I • Chapter 7 pages 26-27, Program 4-J • Chapter 7 page 27, Program 4-K • Chapter 7 pages 27-28, Program 4-L • Chapter 7 page 28, Program 4-M • Chapter 7 pages 28-29, Program 4-N • Chapter 7 pages 29-30, Program 4-O • Chapter 7 page 30, Program 4-P • Chapter 7 pages 30-31, Program 4-Q • Chapter 7 page 31, Program 4-R • Chapter 7 pages 31-31, Program 4-S
(c)(6) Preserve for lower income households the assisted housing developments identified pursuant to paragraph (9) of subdivision (a).	<ul style="list-style-type: none"> • Chapter 7 page 19, Program 3-G • Chapter 7 page 19, Program 3-H
(c)(6) The program for preservation of the assisted housing developments shall utilize, to the extent necessary, all available federal, state, and local financing and subsidy programs identified in paragraph (9) of subdivision (a), except where a community has other urgent needs for which alternative funding sources are not available.	<ul style="list-style-type: none"> • Chapter 7 page 19, Program 3-G • Chapter 7 page 19, Program 3-H
(c)(6) The program may include strategies that involve local regulation and technical assistance.	<ul style="list-style-type: none"> • Chapter 7 page 19, Program 3-G • Chapter 7 page 19, Program 3-H
(c)(7) Develop a plan that incentivizes and promotes the creation of accessory dwelling units that can be offered at affordable rent, as defined in Section 50053 of the Health and Safety Code, for very low, low-, or moderate-income households. For purposes of this paragraph, "accessory dwelling units" has the same meaning as "accessory dwelling unit" as defined in	<ul style="list-style-type: none"> • Chapter 6 pages 23-24 • Chapter 7 page 30, Program 4-P

paragraph (4) of subdivision (i) of Section 65852.2.\	
(c)(8) Include an identification of the agencies and officials responsible for the implementation of the various actions and the means by which consistency will be achieved with other general plan elements and community goals.	<ul style="list-style-type: none"> • Chapter 7 • Chapter 1 pages 5-7
(c)(9) Include a diligent effort by the local government to achieve public participation of all economic segments of the community in the development of the housing element, and the program shall describe this effort.	<ul style="list-style-type: none"> • Chapter 5
(c)(10)(A) Affirmatively further fair housing in accordance with Chapter 15 (commencing with Section 8899.50) of Division 1 of Title 2. The program shall include an assessment of fair housing in the jurisdiction that shall include all of the following components:	<ul style="list-style-type: none"> • Chapter 4
(c)(10)(A)(i) A summary of fair housing issues in the jurisdiction	<ul style="list-style-type: none"> • Appendices C-I • Chapter 4 pages 58-59
(c)(10)(A)(i) and an assessment of the jurisdiction's fair housing enforcement and fair housing outreach capacity.	<ul style="list-style-type: none"> • Chapter 4 pages 5-8
(c)(10)(A)(ii) An analysis of available federal, state, and local data and knowledge to identify integration and segregation patterns and trends,	<ul style="list-style-type: none"> • Chapter 4 pages 9-27
(c)(10)(A)(ii) racially or ethnically concentrated areas of poverty and affluence,	<ul style="list-style-type: none"> • Chapter 4 page pages 28-29
(c)(10)(A)(ii) disparities in access to opportunity,	<ul style="list-style-type: none"> • Chapter 2, page 9 • Chapter 4, pages 14, 19, 30-41, 58 • Chapter 7 <ul style="list-style-type: none"> ○ page 26 Programs 4-J, 4-K, 4-L • Appendix H
(c)(10)(A)(ii) and disproportionate housing needs,	<ul style="list-style-type: none"> • Chapter 4 <ul style="list-style-type: none"> ○ pages 42-50, 54-56 • Chapter 7 <ul style="list-style-type: none"> ○ Page 10 Program 2-G ○ Page 12 Program 2-H ○ Page 23 Program 4-E ○ Page 24 Programs 4-F, 4-G ○ Page 25 Programs 4-I, 4-H ○ Page 28 Program 4-M ○ Page 29 Program 4-N ○ Page 29 Program 4-O ○ Page 30 Program 4-P ○ Page 30 Program 4-Q

	<ul style="list-style-type: none"> ○ Page 31 Program 4-R ○ Page 31 Program 4-S • Appendix C <ul style="list-style-type: none"> ○ Section IV pages 28-34 • Appendix D page 52 • Appendix G page 5-6
(c)(10)(A)(ii) including displacement risk.	<ul style="list-style-type: none"> • Chapter 2 page 28 • Chapter 4 pages 3-4, 8, 18, 42, 48, 49, • Chapter 7 <ul style="list-style-type: none"> ○ Page 24 Programs 4-F, 4-G ○ Page 25 Program 4-H ○ Page 26 Program 4-I ○ Page 31 Program 4-S • Appendix G page 7
(c)(10)(A)(ii) The analysis shall identify and examine such patterns, trends, areas, disparities, and needs, both within the jurisdiction.	<ul style="list-style-type: none"> • Chapter 2 • Chapter 4 <ul style="list-style-type: none"> ○ Pages 9-16 • Chapter 7 <ul style="list-style-type: none"> ○ Page 21 Program 4-A ○ Page 26 Program 4-J
(c)(10)(A)(ii) and comparing the jurisdiction to the region in which it is located, based on race and other characteristics protected by the California Fair Employment and Housing Act (Part 2.8 (commencing with Section 12900) of Division 3 of Title 2) and Section 65008.	<ul style="list-style-type: none"> • Chapter 3 pages 25,26 • Chapter 4 pages 7, 8, 10, 18, 21, 28, 30, 31, 33, 36, 43, 47
(c)(10)(A)(iii) An assessment of the contributing factors, including the local and regional historical origins	<ul style="list-style-type: none"> • Chapter 4, Section J pages 54-55
(c)(10)(A)(iii) and current policies and practices, for the fair housing issues identified under clauses (i) and (ii).	<ul style="list-style-type: none"> • Appendix A <ul style="list-style-type: none"> ○ Program 3-E ○ Program 6-A ○ Program 6-B
(c)(10)(A)(iv) An identification of the jurisdiction's fair housing priorities and goals, giving highest priority to those factors identified in clause (iii) that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance,	<ul style="list-style-type: none"> • Chapter 4 Pages 8, 16, 52-59
(c)(10)(A)(iv) and identifying the metrics and milestones for determining what fair housing results will be achieved.	<ul style="list-style-type: none"> • Chapter 4 pages 21-32
(c)(10)(A)(v) Strategies and actions to implement those priorities and goals, which may include, but are not limited to, enhancing mobility strategies	<ul style="list-style-type: none"> • Chapter 4 pages 21-32

(c)(10)(A)(v) and encouraging development of new affordable housing in areas of opportunity,	<ul style="list-style-type: none"> Chapter 4 pages 28-32, AFFH Policy 3
(c)(10)(A)(v) as well as place-based strategies to encourage community revitalization, including preservation of existing affordable housing,	<ul style="list-style-type: none"> Chapter 7 pages 26-28, AFFH Policy 2 Chapter 7 page 19, Program 3-G Chapter 7 page 19, Program 3-H
(c)(10)(A)(v) and protecting existing residents from displacement.	<ul style="list-style-type: none"> Chapter 7 page 19, Program 3-H Chapter 7 pages 21-26, AFFH Policy 1
(c)(10)(B) A jurisdiction that completes or revises an assessment of fair housing pursuant to Subpart A (commencing with Section 5.150) of Part 5 of Subtitle A of Title 24 of the Code of Federal Regulations, as published in Volume 80 of the Federal Register, Number 136, page 42272, dated July 16, 2015, or an analysis of impediments to fair housing choice in accordance with the requirements of Section 91.225 of Title 24 of the Code of Federal Regulations in effect before August 17, 2015, may incorporate relevant portions of that assessment or revised assessment of fair housing or analysis or revised analysis of impediments to fair housing into its housing element.	<ul style="list-style-type: none">
(c)(10)(C) The requirements of this paragraph shall apply to housing elements due to be revised pursuant to Section 65588 on or after January 1, 2021.	
(d)(1) A local government may satisfy all or part of its requirement to identify a zone or zones suitable for the development of emergency shelters pursuant to paragraph (4) of subdivision (a) by adopting and implementing a multijurisdictional agreement, with a maximum of two other adjacent communities, that requires the participating jurisdictions to develop at least one year-round emergency shelter within two years of the beginning of the planning period.	<ul style="list-style-type: none"> Not applicable because the City has no such multijurisdictional agreement for emergency shelters.
(d)(2) The agreement shall allocate a portion of the new shelter capacity to each jurisdiction as credit toward its emergency shelter need, and each jurisdiction shall describe how the capacity was allocated as part of its housing element.	<ul style="list-style-type: none"> Not applicable because the City has no such multijurisdictional agreement for emergency shelters.
(d)(3) Each member jurisdiction of a multijurisdictional agreement shall describe in its housing element all of the following:	<ul style="list-style-type: none"> Not applicable because the City has no such multijurisdictional agreement for emergency shelters.

<p>(d)(3)(A) How the joint facility will meet the jurisdiction's emergency shelter need.</p> <p>(d)(3)(B) The jurisdiction's contribution to the facility for both the development and ongoing operation and management of the facility.</p> <p>(d)(3)(C) The amount and source of the funding that the jurisdiction contributes to the facility.</p>	<ul style="list-style-type: none"> Not applicable because the City has no such multijurisdictional agreement for emergency shelters.
<p>(d)(4) The aggregate capacity claimed by the participating jurisdictions in their housing elements shall not exceed the actual capacity of the shelter.</p>	<ul style="list-style-type: none"> Not applicable because the City has no such multijurisdictional agreement for emergency shelters.
<p>(e) Except as otherwise provided in this article, amendments to this article that alter the required content of a housing element shall apply to both of the following: [Note that this provision is applicable to AB 2339 (Chapter 654, Statutes of 2022), which amended Section 65583(a)(4). Jurisdictions adopting their housing element after January 1, 2023, should describe why this amendment is not applicable to them.]</p>	<ul style="list-style-type: none"> San Bruno is subject to the amendments in this article because the City will be adopting its Housing Element after January 1, 2023.
<p>(1) A housing element or housing element amendment prepared pursuant to subdivision (e) of Section 65588 or Section 65584.02, when a city, county, or city and county submits a draft to the department for review pursuant to Section 65585 more than 90 days after the effective date of the amendment to this section.</p>	<ul style="list-style-type: none">
<p>(2) Any housing element or housing element amendment prepared pursuant to subdivision (e) of Section 65588 or Section 65584.02, when the city, county, or city and county fails to submit the first draft to the department before the due date specified in Section 65588 or 65584.02.</p>	<ul style="list-style-type: none">
<p>(f) – (j): Not applicable</p>	
<ul style="list-style-type: none"> Section 65583.1(a) 	
<p>(a) The Department of Housing and Community Development, in evaluating a proposed or adopted housing element for substantial compliance with this article, ... may also allow a city or county to identify sites for accessory dwelling units based on the number of accessory dwelling units developed in the prior housing element planning period whether or not the units are permitted by right, the need for these units in the community, the resources or incentives available for their development, and</p>	<ul style="list-style-type: none"> Chapter 6 pages 22-23

any other relevant factors, as determined by the department.	
(b) Sites that contain permanent housing units located on a military base undergoing closure or conversion as a result of action pursuant to the Defense Authorization Amendments and Base Closure and Realignment Act (Public Law 100-526), the Defense Base Closure and Realignment Act of 1990 (Public Law 101-510), or any subsequent act requiring the closure or conversion of a military base may be identified as an adequate site if the housing element demonstrates that the housing units will be available for occupancy by households within the planning period of the element. No sites containing housing units scheduled or planned for demolition or conversion to nonresidential uses shall qualify as an adequate site.	<ul style="list-style-type: none"> No applicable because none of the housing sites are former military bases.
Note: If communities are using the provisions of Section 65583.1(c), which allow RHNA credit for conversion of non-affordable to affordable housing and for preservation of existing affordable housing at risk of loss, the applicable provisions need to be added to this table.	<ul style="list-style-type: none"> Not applicable because the City is not proposing to convert non-affordable housing to affordable housing for RHNA credit.
<ul style="list-style-type: none"> Section 65583.2 	
(a) A city's or county's inventory of land suitable for residential development pursuant to paragraph (3) of subdivision (a) of Section 65583 shall be used to identify sites throughout the community, consistent with paragraph (10) of subdivision (c) of Section 65583,	<ul style="list-style-type: none"> Chapter 6 pages 15-16 Appendix K
(a) that can be developed for housing within the planning period and that are sufficient to provide for the jurisdiction's share of the regional housing need for all income levels pursuant to Section 65584. As used in this section, "land suitable for residential development" includes all of the following sites that meet the standards set forth in subdivisions (c) and (g):	<ul style="list-style-type: none"> Chapter 6 page 1
(a)(1) Vacant sites zoned for residential use.	<ul style="list-style-type: none"> Chapter 6 Table 6-4
(a)(2) Vacant sites zoned for nonresidential use that allows residential development.	<ul style="list-style-type: none"> Chapter 6 Table 6-4
(a)(3) Residentially zoned sites that are capable of being developed at a higher density, including sites owned or leased by a city, county, or city and county	<ul style="list-style-type: none"> Chapter 6 Table 6-4

(a)(4) Sites zoned for nonresidential use that can be redeveloped for residential use, and for which the housing element includes a program to rezone the site, as necessary, rezoned for, to permit residential use, including sites owned or leased by a city, county, or city and county.	<ul style="list-style-type: none"> • Chapter 6 Table 6-4 • Chapter 7 Program 2-E
(b) The inventory of land shall include all of the following:	
(b)(1) A listing of properties by assessor parcel number.	<ul style="list-style-type: none"> • Chapter 6 pages 15-16 • Appendix K
(b)(2) The size of each property listed pursuant to paragraph (1), and the general plan designation and zoning of each property.	<ul style="list-style-type: none"> • Chapter 6 pages 15-16 • Appendix K
(b)(3) For nonvacant sites, a description of the existing use of each property.	<ul style="list-style-type: none"> • Chapter 6 pages 15-16 • Appendix K
(b)(3) If a site subject to this paragraph is owned by the city or county, the description shall also include whether there are any plans to dispose of the property during the planning period and how the city or county will comply with Article 8 (commencing with Section 54220) of Chapter 5 of Part 1 of Division 2 of Title 5.	<ul style="list-style-type: none"> • Not applicable because none of the sites in the inventory are city-owned.
(b)(4) A general description of any environmental constraints to the development of housing within the jurisdiction, the documentation for which has been made available to the jurisdiction. This information need not be identified on a site-specific basis.	<ul style="list-style-type: none"> • Chapter 3 pages 35-37
(b)(5)(A) A description of existing or planned water, sewer, and other dry utilities supply, including the availability and access to distribution facilities.	<ul style="list-style-type: none"> • Chapter 3 pages 21, 27
(b)(5)(B) Parcels included in the inventory must have sufficient water, sewer, and dry utilities supply available and accessible to support housing development or be included in an existing general plan program or other mandatory program or plan, including a program or plan of a public or private entity providing water or sewer service, to secure sufficient water, sewer, and dry utilities supply to support housing development. This paragraph does not impose any additional duty on the city or county to construct, finance, or otherwise provide water, sewer, or dry utilities to parcels included in the inventory.	<ul style="list-style-type: none"> • Chapter 3 pages 21, 27

(b)(6) Sites identified as available for housing for above moderate-income households in areas not served by public sewer systems. This information need not be identified on a site-specific basis.	<ul style="list-style-type: none"> Chapter 6 Table 6-4
(b)(7) A map that shows the location of the sites included in the inventory, such as the land use map from the jurisdiction's general plan, for reference purposes only.	<ul style="list-style-type: none"> Chapter 6 page 13
(c) Based on the information provided in subdivision (b), a city or county shall determine whether each site in the inventory can accommodate the development of some portion of its share of the regional housing need by income level during the planning period, as determined pursuant to Section 65584. The inventory shall specify for each site the number of units that can realistically be accommodated on that site and whether the site is adequate to accommodate lower income housing, moderate-income housing, or above moderate-income housing.	<ul style="list-style-type: none"> Appendix K
(c) A nonvacant site identified pursuant to paragraph (3) or (4) of subdivision (a) in a prior housing element and a vacant site that has been included in two or more consecutive planning periods that was not approved to develop a portion of the locality's housing need shall not be deemed adequate to accommodate a portion of the housing need for lower income households that must be accommodated in the current housing element planning period unless the site is zoned at residential densities consistent with paragraph (3) of this subdivision and the site is subject to a program in the housing element requiring rezoning within three years of the beginning of the planning period to allow residential use by right for housing developments in which at least 20 percent of the units are affordable to lower income households. An unincorporated area in a nonmetropolitan county pursuant to clause (ii) of subparagraph (B) of paragraph (3) shall not be subject to the requirements of this subdivision to allow residential use by right.	<ul style="list-style-type: none"> Chapter 6 Table 6-4
(c) Notwithstanding the foregoing, for a local government that fails to adopt a housing element that the department has found to be in substantial compliance with state law within 120	<ul style="list-style-type: none"> San Bruno intends to adopt its Housing Element by the January 31, 2023 due

days of the statutory deadline in Section 65588 for adoption of the housing element, rezoning pursuant to this subdivision shall be completed no later than one year from the statutory deadline in Section 65588 for adoption of the housing element.	date and therefore will not be subject to the one-year rezoning requirement.
(c) The analysis shall determine whether the inventory can provide for a variety of types of housing, including multifamily rental housing,	<ul style="list-style-type: none"> • Chapter 4 page 58
(c) factory-built housing, mobilehomes,	<ul style="list-style-type: none"> • Chapter 3 page 15
(c) housing for agricultural employees, supportive housing,	<ul style="list-style-type: none"> • Chapter 3 pages 16-17 • Chapter 7 Program 2-G
(c) single-room occupancy units,	<ul style="list-style-type: none"> • Chapter 3 pages 16-17 • Chapter 7 Program 2-G
(c) emergency shelters, and	<ul style="list-style-type: none"> • Chapter 3 page 15 • Chapter 7 Program 2-G
(c) transitional housing	<ul style="list-style-type: none"> • Chapter 3 pages 12-13
(c) and whether the inventory affirmatively furthers fair housing.	<ul style="list-style-type: none"> • Chapter 4 page 58
(c) The city or county shall determine the number of housing units that can be accommodated on each site as follows:	
(c)(1) If local law or regulations require the development of a site at a minimum density, the department shall accept the planning agency's calculation of the total housing unit capacity on that site based on the established minimum density. If the city or county does not adopt a law or regulation requiring the development of a site at a minimum density, then it shall demonstrate how the number of units determined for that site pursuant to this subdivision will be accommodated.	<ul style="list-style-type: none"> • Chapter 6 Table 6-4 • Chapter 6 page 6
(c)(2) The number of units calculated pursuant to paragraph (1) shall be adjusted as necessary, based on the land use controls and site improvements requirement identified in paragraph (5) of subdivision (a) of Section 65583,	<ul style="list-style-type: none"> • Chapter 6 Table 6-4 • Chapter 6 page 6
(c)(2) the realistic development capacity for the site,	<ul style="list-style-type: none"> • Chapter 6 Table 6-4 • Chapter 6 page 6
(c)(2) typical densities of existing or approved residential developments at a similar affordability level in that jurisdiction,	<ul style="list-style-type: none"> • Chapter 6 Table 6-4 • Chapter 6 page 6
(c)(2) and on the current or planned availability and accessibility of sufficient water, sewer, and dry utilities.	<ul style="list-style-type: none"> • Chapter 6 Table 6-4

(c)(2)(A) A site smaller than half an acre shall not be deemed adequate to accommodate lower income housing need unless the locality can demonstrate that sites of equivalent size were successfully developed during the prior planning period for an equivalent number of lower income housing units as projected for the site or unless the locality provides other evidence to the department that the site is adequate to accommodate lower income housing.	<ul style="list-style-type: none"> Chapter 6 pages 11 and 14
(c)(2)(B) A site larger than 10 acres shall not be deemed adequate to accommodate lower income housing need unless the locality can demonstrate that sites of equivalent size were successfully developed during the prior planning period for an equivalent number of lower income housing units as projected for the site or unless the locality provides other evidence to the department that the site can be developed as lower income housing.	<ul style="list-style-type: none"> Chapter 6 pages 11 and 14
(c)(2)(B) For purposes of this subparagraph, “site” means that portion of a parcel or parcels designated to accommodate lower income housing needs pursuant to this subdivision.	<ul style="list-style-type: none"> Appendix K
(c)(2)(C) A site may be presumed to be realistic for development to accommodate lower income housing need if, at the time of the adoption of the housing element, a development affordable to lower income households has been proposed and approved for development on the site.	<ul style="list-style-type: none"> Appendix K
(c)(3) For the number of units calculated to accommodate its share of the regional housing need for lower income households pursuant to paragraph (2), a city or county shall do either of the following:	
(c)(3)(A) Provide an analysis demonstrating how the adopted densities accommodate this need. The analysis shall include, but is not limited to, factors such as market demand, financial feasibility, or information based on development project experience within a zone or zones that provide housing for lower income households.	<ul style="list-style-type: none"> Chapter 6 Table 6-6 Chapter 6 page 17
(c)(3)(B) The following densities shall be deemed appropriate to accommodate housing for lower income households: (i) For an incorporated city within a nonmetropolitan county and for a	<ul style="list-style-type: none"> Chapter 6 page 11

<p>nonmetropolitan county that has a micropolitan area: sites allowing at least 15 units per acre.</p> <p>(ii) For an unincorporated area in a nonmetropolitan county not included in clause (i): sites allowing at least 10 units per acre.</p> <p>(iii) For a suburban jurisdiction: sites allowing at least 20 units per acre.</p> <p>(iv) For a jurisdiction in a metropolitan county: sites allowing at least 30 units per acre.</p>	
(4)(A) For a metropolitan jurisdiction:	<ul style="list-style-type: none"> Chapter 6 page 11
(4)(A)(i) At least 25 percent of the jurisdiction's share of the regional housing need for moderate-income housing shall be allocated to sites with zoning that allows at least 4 units of housing, but not more than 100 units per acre of housing.	<ul style="list-style-type: none"> Chapter 6 Table 6-4
(4)(A)(ii) At least 25 percent of the jurisdiction's share of the regional housing need for above moderate-income housing shall be allocated to sites with zoning that allows at least 4 units of housing.	<ul style="list-style-type: none"> Chapter 6 Table 6-4
<p>(B) The allocation of moderate-income and above moderate-income housing to sites pursuant to this paragraph shall not be a basis for the jurisdiction to do either of the following:</p> <p>(i) Deny a project that does not comply with the allocation.</p> <p>(ii) Impose a price minimum, price maximum, price control, or any other exaction or condition of approval in lieu thereof. This clause does not prohibit a jurisdiction from imposing any price minimum, price maximum, price control, exaction, or condition in lieu thereof, pursuant to any other law.</p> <p>(iii) The provisions of this subparagraph do not constitute a change in, but are declaratory of, existing law with regard to the allocation of sites pursuant to this section.</p>	
(C) This paragraph does not apply to an unincorporated area.	
(D) For purposes of this paragraph:	
(i) "Housing development project" has the same meaning as defined in paragraph (2) of subdivision (h) of Section 65589.5.	
(ii) "Unit of housing" does not include an accessory dwelling unit or junior accessory dwelling unit that could be approved pursuant to Section 65852.2 or Section 65852.22 or through a	

<p>local ordinance or other provision implementing either of those sections. This paragraph shall not limit the ability of a local government to count the actual production of accessory dwelling units or junior accessory dwelling units in an annual progress report submitted pursuant to Section 65400 or other progress report as determined by the department.</p>	
<p>(E) Nothing in this subdivision shall preclude the subdivision of a parcel, provided that the subdivision is subject to the Subdivision Map Act (Division 2 (commencing with Section 66410)) or any other applicable law authorizing the subdivision of land.</p>	
<p>(d) For purposes of this section, a metropolitan county, nonmetropolitan county, and nonmetropolitan county with a micropolitan area shall be as determined by the United States Census Bureau. A nonmetropolitan county with a micropolitan area includes the following counties: Del Norte, Humboldt, Lake, Mendocino, Nevada, Tehama, and Tuolumne and other counties as may be determined by the United States Census Bureau to be nonmetropolitan counties with micropolitan areas in the future.</p>	
<p>(e) (1) Except as provided in paragraph (2), a jurisdiction shall be considered suburban if the jurisdiction does not meet the requirements of clauses (i) and (ii) of subparagraph (B) of paragraph (3) of subdivision (c) and is located in a Metropolitan Statistical Area (MSA) of less than 2,000,000 in population, unless that jurisdiction's population is greater than 100,000, in which case it shall be considered metropolitan. A county, not including the City and County of San Francisco, shall be considered suburban unless the county is in an MSA of 2,000,000 or greater in population in which case the county shall be considered metropolitan.</p>	
<p>(2)(A)(i) Notwithstanding paragraph (1), if a county that is in the San Francisco-Oakland-Fremont California MSA has a population of less than 400,000, that county shall be considered suburban. If this county includes an incorporated city that has a population of less than 100,000, this city shall also be considered suburban. This paragraph shall apply to a housing element revision cycle, as described in subparagraph (A)</p>	

of paragraph (3) of subdivision (e) of Section 65588, that is in effect from July 1, 2014, to December 31, 2028, inclusive.	
(2)(A)(ii) A county subject to this subparagraph shall utilize the sum existing in the county's housing trust fund as of June 30, 2013, for the development and preservation of housing affordable to low- and very low-income households.	
(2)(B) A jurisdiction that is classified as suburban pursuant to this paragraph shall report to the Assembly Committee on Housing and Community Development, the Senate Committee on Housing, and the Department of Housing and Community Development regarding its progress in developing low- and very low-income housing consistent with the requirements of Section 65400. The report shall be provided three times: once, on or before December 31, 2019, which report shall address the initial four years of the housing element cycle, a second time, on or before December 31, 2023, which report shall address the subsequent four years of the housing element cycle, and a third time, on or before December 31, 2027, which report shall address the subsequent four years of the housing element cycle and the cycle as a whole. The reports shall be provided consistent with the requirements of Section 9795.	
<p>(f) A jurisdiction shall be considered metropolitan if the jurisdiction does not meet the requirements for "suburban area" above and is located in an MSA of 2,000,000 or greater in population unless that jurisdiction's population is less than 25,000 in which case it shall be considered suburban.</p> <p>(g)(1) For sites described in paragraph (3) of subdivision (b) [non-vacant sites], the city or county shall specify the additional development potential for each site within the planning period and shall provide an explanation of the methodology used to determine the development potential.</p>	<ul style="list-style-type: none"> • Chapter 6 pages 10-11 • Chapter 6 Table 6-4
(g)(1) The methodology shall consider factors including the extent to which existing uses may constitute an impediment to additional residential development,	<ul style="list-style-type: none"> • Chapter 6 Table 6-6

(g)(1) the city's or county's past experience with converting existing uses to higher density residential development,	<ul style="list-style-type: none"> Chapter 6 pages 6-7
(g)(1) the current market demand for the existing use,	<ul style="list-style-type: none"> Chapter 6 Table 6-6
(g)(1) an analysis of any existing leases or other contracts that would perpetuate the existing use or prevent redevelopment of the site for additional residential development,	
(g)(1) development trends,	<ul style="list-style-type: none"> Chapter 6 pages
(g)(1) market conditions,	<ul style="list-style-type: none"> Chapter 6 pages 8-9
(g)(1) and regulatory or other incentives or standards to encourage additional residential development on these sites.	<ul style="list-style-type: none"> Chapter 7 Program 2-E Chapter 7 Program 2-H Chapter 7 Program 2-K Chapter 7 Program 2-M
(g)(2) In addition to the analysis required in paragraph (1), when a city or county is relying on nonvacant sites described in paragraph (3) of subdivision (b) to accommodate 50 percent or more of its housing need for lower income households, the methodology used to determine additional development potential shall demonstrate that the existing use identified pursuant to paragraph (3) of subdivision (b) does not constitute an impediment to additional residential development during the period covered by the housing element. An existing use shall be presumed to impede additional residential development, absent findings based on substantial evidence that the use is likely to be discontinued during the planning period.	<ul style="list-style-type: none"> Chapter 6 Table 6-6
(g)(3) Notwithstanding any other law, and in addition to the requirements in paragraphs (1) and (2), sites that currently have residential uses, or within the past five years have had residential uses that have been vacated or demolished, that are or were subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of low or very low income, subject to any other form of rent or price control through a public entity's valid exercise of its police power, or occupied by low or very low income households, shall be subject to a policy requiring the replacement of all those units affordable to the same or lower income level as a condition of any development on the site. Replacement requirements shall be	<ul style="list-style-type: none"> Not applicable because none of the sites in the inventory contain existing housing units.

consistent with those set forth in paragraph (3) of subdivision (c) of Section 65915.	
(h) The program required by subparagraph (A) of paragraph (1) of subdivision (c) of Section 65583 shall accommodate 100 percent of the need for housing for very low and low-income households allocated pursuant to Section 65584 for which site capacity has not been identified in the inventory of sites pursuant to paragraph (3) of subdivision (a) on sites that shall be zoned to permit owner-occupied and rental multifamily residential use by right for developments in which at least 20 percent of the units are affordable to lower income households during the planning period.	
(h) These sites shall be zoned with minimum density and development standards that permit at least	
(h) 16 units per site at a density of at least 16 units per acre in jurisdictions described in clause (i) of subparagraph (B) of paragraph (3) of subdivision (c),	
(h) shall be at least 20 units per acre in jurisdictions described in clauses (iii) and (iv) of subparagraph (B) of paragraph (3) of subdivision (c)	
(h) and shall meet the standards set forth in subparagraph (B) of paragraph (5) of subdivision (b).	
(h) At least 50 percent of the very low and low-income housing need shall be accommodated on sites designated for residential use and for which nonresidential uses or mixed uses are not permitted, except that a city or county may accommodate all of the very low and low-income housing need on sites designated for mixed uses if those sites allow 100 percent residential use and require that residential use occupy 50 percent of the total floor area of a mixed-use project.	<ul style="list-style-type: none"> • Appendix K
(i) For purposes of this section and Section 65583, the phrase “use by right” shall mean that the local government’s review of the owner-occupied or multifamily residential use may not require a conditional use permit, planned unit development permit, or other discretionary local government review or approval that would	

constitute a “project” for purposes of Division 13 (commencing with Section 21000) of the Public Resources Code. Any subdivision of the sites shall be subject to all laws, including, but not limited to, the local government ordinance implementing the Subdivision Map Act.	
(i) A local ordinance may provide that “use by right” does not exempt the use from design review. However, that design review shall not constitute a “project” for purposes of Division 13 (commencing with Section 21000) of the Public Resources Code.	
(i) Use by right for all rental multifamily residential housing shall be provided in accordance with subdivision (f) of Section 65589.5.	
(j) Notwithstanding any other provision of this section, within one-half mile of a Sonoma-Marín Area Rail Transit station, housing density requirements in place on June 30, 2014, shall apply.	

Exhibit C

RESPONSE TO HCD FINDINGS

Comment			SB Response		HE Section/Page#
Appendix A Review and Revision		1	Analysis must be included for all programs in the previous housing element including progress and actual results for each.	More analysis has been added to each program evaluation for the previous cycle.	Appendix A
Appendix A Review and Revision		2	Provide a description of how the objectives and programs of the updated element incorporate changes resulting from the evaluation of the previous HE.	More description about how certain programs from the previous Housing Element were incorporated into the current Housing Element have been added throughout the evaluation	Appendix A
Appendix A Review and Revision		3	If the City failed to make adequate sites available to accommodate the regional housing need in the prior planning period, the City must zone or rezone sites to accommodate any unaccommodated need within the first year of the 2023-2031 planning period. (Gov. Code, § 65584.09.) Program 2-A was necessary to demonstrate compliance with the adequate sites requirement in the previous planning period, however it was not completed. To demonstrate adequate sites were made available in the prior planning period, the element must include an analysis or programs demonstrating compliance with the statutory requirements. For additional information, see HCD's AB 1233 Memorandum at https://www.hcd.ca.gov/hcd-memos and the Building Blocks at https://www.hcd.ca.gov/review-and-revise .	Program 2-A from the previous cycle was to be completed within 3 years of Housing Element adoption but was instead completed six years after element adoption. Adequate sites were made available after the initial delay. However, the city continued to entitle housing projects in the TCP during the delay.	Program 2-A on page 13
Appendix A Review and Revision		4	The element must evaluate the effectiveness of goals, policies, and related actions in meeting the housing needs of special needs populations (e.g., elderly, persons with disabilities, large households, female headed households, farmworkers and persons experiencing homelessness).	Additional evaluation regarding the effectiveness of those programs that impact special needs populations has been added.	See Appendix page A-54
Chapter 4 AFFH	Integration & Segregation	5	The element must evaluate racial patterns at a regional basis, comparing the City to the region.	Added narrative and maps	pp. 4-8 to 4-11
Chapter 4 AFFH	Integration & Segregation	6	Must discuss and analyze data on persons with disabilities for trends over time and patterns across census tracts as well as evaluate patterns at a regional basis.	New information from Housing Choices and maps	pp. 4-17 to 4-19
Chapter 4 AFFH	Integration & Segregation	7	Must describe and analyze concentrations of income and familial status geographically throughout the City.	Added narrative and maps	income: pp. 4-14 to 4-17 familial status: pp. 4-19 to 4-21
Chapter 4 AFFH	Access to Opportunity	8	While the element identified an area of access to education with lower outcomes, it must describe and analyze how that affects fair housing and other factors.	Added narrative and maps	pp. 4-28 to 4-30 and summary on pp. 4-33 to 4-37

Chapter 4 AFFH	Access to Opportunity	9	The element should describe and analyze the access to jobs throughout the City and for protected classes.	Added narrative and maps	pp. 4-29 to 4-30 and summary on pp. 4-33 to 4-37
Chapter 4 AFFH	Access to Opportunity	10	The element should describe and analyze the access to transit throughout the City and for protected classes.	Added narrative and maps	pp. 4-30 to 4-32 and summary on pp. 4-33 to 4-37
Chapter 4 AFFH	Disproportionate Housing Needs	11	The element must analyze the areas of poor environmental outcomes and identify actions to address fair housing issues.	Added narrative and maps	pp. 4-32 to 4-35
Chapter 4 AFFH	Disproportionate Housing Needs	12	Describe any geographic concentration of cost burden, overcrowding by tenure, and substandard housing.	Added narrative and maps	pp. 4-39 to 4-46
Chapter 4 AFFH	Disproportionate Housing Needs	13	Describe and analyze areas sensitive to displacement, including displacement risk due to disaster.	Added narrative and maps	pp. 4-43 to 4-46
Chapter 4 AFFH	Site Inventory Analysis	14	The element must identify whether sites improve or exacerbate fair housing issues in the City. If sites exacerbate conditions, the element should identify further program actions that will be taken to promote equitable quality of life throughout the community (e.g., anti-displacement and place-based community revitalization strategies).	New subsections titled "Site Inventory Analysis Findings" were added to each section that addresses this question for race, income, disability, familial status, all fh factors related to access to opportunity and all fh factors related to disproportionate housing needs. New program actions were added and included in FHAP as well as in chapter 7 on policies and programs.	Throughout chapter 4, FHAP
Chapter 4 AFFH	Site Inventory Analysis	15	Address the income categories of identified sites with respect to location, the number of sites and units by all income groups, and how that affects the existing patterns for all components of the	New subsections titled "Site Inventory Analysis Findings" was added to each section and	Throughout chapter 4

			assessment of fair housing (e.g., segregation and integration, access to opportunity).	provides this information in both narrative and table format.	
Chapter 4 AFFH	Fair Housing Action Plan (Goals, Actions, Metrics, Milestones)	16	Goals and actions must specifically respond to the analysis and to the identified and prioritized contributing factors to fair housing issues and must be significant and meaningful enough to overcome identified patterns and trends. Actions must have specific commitment, milestones, geographic targeting and metrics or numerical targets and, as appropriate, address housing mobility enhancement, new housing choices and affordability in high opportunity areas, place-based strategies for community preservation and revitalization and displacement protection.	New program actions were added where needed and programs were edited to provide milestones, metrics	New AFFH Programs included which respond directly to AFFH analysis are: 5-E, 5-F, 5-I, 5-J, 5-L, 5-N, 5-O, 5-P, 5-U, 5-V, and 5-W
Chapter 2 Needs Analysis	Housing Stock Condition	17	Estimate of the number of units in need of rehabilitation and replacement (possible sources are: recent windshield survey, estimates from the code enforcement agency, or information from knowledgeable builders/developers, including non-profit housing developers or organizations).	analysis added	page 2-36
Chapter 2 Needs Analysis	Housing Costs	18	While the element includes estimated rents for residents, it utilizes American Community Survey (ACS) data. The element should supplement census data with other sources (e.g., local knowledge).	Additional rental data added	page 2-24
Chapter 2 Needs Analysis	Persons with Disabilities	19*	While the element quantifies the number of persons with disabilities, it must also analyze their special housing needs. For a complete analysis, the element should discuss challenges faced by the population, the existing resources to meet those needs, an assessment of any gaps in resources, and proposed policies, programs, and funding to help address those gaps.	Analysis added for disability housing needs.	pages 2-40, 2-41
Chapter 6 Sites Inventory	Progress Meeting RHNA	20	The City's RHNA may be reduced by the number of new units built since June 30, 2022; however, the element must demonstrate their affordability based on actual sales price, rent level, or other mechanisms ensuring affordability (e.g., deed restrictions). The element should also discuss the status, any barriers to development and other relevant factors to demonstrate their availability in the planning period.	10 dwellings have been constructed in the city since July 1, 2022. Paragraph added.	page 6-7

Chapter 6 Sites Inventory	Sites Inventory	21	The element must list sites by parcel number, parcel size, zoning, general plan designation, describing existing uses for nonvacant sites and include a calculation of the realistic capacity of each site. While the element includes most of these requirements, the inventory must include the calculation of units in whole number increments. In addition, sites that are identified for rezoning must include existing and proposed general plan and zoning designations. The element must also ensure there are sufficient sites identified in the inventory, either with existing zoning or proposed rezones to meet the lower and moderate income RHNA.	See Table 6-4	pages 6-13 to 6-15
Chapter 6 Sites Inventory	Realistic Capacity	22	While the element provides assumptions of buildout for sites included in the inventory, it must also provide support for these assumptions (e.g., recent project examples). For example, the element should demonstrate what specific trends, factors, and other evidence led to the assumptions.	Most density assumptions are based on actual projects or projects submitted nearby for similarly situated sites.	page 6-16 and table 6-6
Chapter 6 Sites Inventory	Realistic Capacity	23	The estimate of the number of units for each site must be adjusted as necessary, based on the land use controls and site improvements and typical densities of existing or approved residential developments at a similar affordability level.	None of the unit estimates have been adjusted but more justification has been provided. Some of the estimates are based on submitted projects.	see Tables 6-5 and 6-6
Chapter 6 Sites Inventory	Realistic Capacity	24	The element should describe what factors were included in the realistic capacity assumptions, especially in the mixed-use zones.	Additional justification added	See table 6-6
Chapter 6 Sites Inventory	Realistic Capacity	25	The element includes many sites in the transit-oriented development (TOD) which does not include a maximum density. Assumptions of realistic capacity should be supported with examples.	The following project examples were added to support assumptions: 111 San Bruno, Mills Park, and 732 - 740 ECR.	see page 6-16
Chapter 6 Sites Inventory	Realistic Capacity	26	Some sites in the inventory assume over 200 units an acre (including site 1 on page 6-13). These assumptions should be supported with examples. Examples to support realistic capacity assumptions should also include affordability levels, and percent of maximum densities.	Site #1 is the densest site in the inventory. No assumptions were made for this site because it is based on a submitted application. Staff noted projects with submitted applications are denser than staff previously anticipated. The density assumptions for sites without submitted applications was based on the project details of similar sites nearby. More information has	Table 6-6

					been added to the justification to make this connection more explicit.	
Chapter 6 Sites Inventory	Realistic Capacity	27	<p>The calculation of residential capacity must also account for the likelihood of residential development in zoning where 100 percent nonresidential uses are allowed. The analysis should be based on factors such as development trends including nonresidential, performance standards requiring residential uses or other relevant factors such as enhanced policies and programs. For example, the element could analyze all development activity in these nonresidential zones, how often residential development occurs and adjust residential capacity calculations, policies, and programs accordingly.</p> <p>The element must demonstrate zoning appropriate to accommodate housing for lower-income households. For sites with zoning meeting specified densities or default densities (30 units per acre in San Bruno), no analysis is required. Otherwise, the element must include analysis based on statutory factors. While the element identifies densities of at least 30 units per acre for many of the sites to accommodate housing for lower-income households, other sites do not meet the default density. As a result, if relying on densities less than 30 units per acre to accommodate the lower-income RHNA, an analysis must be included to demonstrate how the zoning encourages the development of units affordable for lower income households. Please see HCD's Building Blocks for more information.</p>		Discussion added.	Page 6-11
Chapter 6 Sites Inventory	Zoning for Lower-Income Households	28	<p>The city imposes a 15% affordable housing requirement on all residential developments of 5+ units. This requirement applies to sites that don't meet the default density requirement.</p>			Page 6-10
Chapter 6 Sites Inventory	Small and Large Sites	29	<p>Sites smaller than half an acre or greater than ten acres are deemed inadequate to accommodate housing for lower-income households unless it is demonstrated, with sufficient evidence, that sites of equivalent size and affordability were successfully developed during the prior planning period or unless the housing element describes other evidence to HCD that the site is adequate to accommodate housing for lower-income households. (Gov. Code, § 65583.2, subd. (c)(2)(A).) Based on the outcomes of the analysis, the element should add or modify programs.</p>		The city imposes a 15% affordable housing requirement on all residential developments of 5+ units. This requirement applies to sites that don't meet the default density requirement.	Page 6-10

Chapter 6 Sites Inventory	Suitability of Nonvacant Sites	30	<p>The element must include an analysis demonstrating the potential for redevelopment of nonvacant sites. The description of existing uses should be sufficiently detailed to facilitate an analysis demonstrating the potential for additional development in the planning period. In addition, the element must analyze the extent that existing uses may impede additional residential development. For example, the element includes sites identified as former schools, and a gas station; but must also demonstrate whether these existing uses would impede development of these sites within the planning period. The element can summarize past experiences converting existing uses to higher density residential development, include current market demand for the existing use, provide analysis of existing leases or contracts that would perpetuate the existing use or prevent additional residential development and include current information on development trends and market conditions in the City and relate those trends to the sites identified. The element could also support, based on recent development trends, indicators such as age and condition of the existing structure, expressed developer interest, existing versus allowable floor area, low improvement to land value ratio, and other factors.</p>	Additional information has been added to Chapter 6.	Table 6-6
Chapter 6 Sites Inventory	Suitability of Nonvacant Sites	31	<p>The housing element relies upon nonvacant sites to accommodate more than 50 percent of the RHNA for lower-income households. For your information, the housing element must demonstrate existing uses are not an impediment to additional residential development and will likely discontinue in the planning period. (Gov. Code, § 65583.2, subd. (g)(2).) Absent findings (e.g., adoption resolution) based on substantial evidence, the existing uses will be presumed to impede additional residential development and will not be utilized toward demonstrating adequate sites to accommodate the regional housing need allocation.</p>	City needs to adopt a resolution	Finding included in resolution
Chapter 6 Sites Inventory	Tanforan Site	32	<p>The element should describe feasibility and timing of development during the planning period and add or modify programs as appropriate. The element mentions an agreement with the developer for a minimum of 1,000 units but it should describe timing, whether a specific plan is needed, and affordability assumptions on the site. The element should also address any known constraints to development (e.g., airport compatibility) and modify programs to ensure the availability of the site or identify alternative sites.</p>	Added to table 6-6	see page 6-24

Chapter 6 Sites Inventory	Sites Identified in Multiple Planning Periods	33	<p>Sites identified in prior planning periods shall not be deemed adequate to accommodate the housing needs for lower-income households unless a program, meeting statutory requirements, requires rezoning within one or three years, whichever is applicable. If utilizing sites outside of the Transit Corridors Specific Plan for the lower-income RHNA, the element should clarify if sites were identified in prior planning periods and if so, which sites and include a program. The program should ensure sites will meet density requirements and allow by-right approval for housing developments that include 20 percent or more of its units affordable to lower income households.</p>	Identified sites that require from previous HE cycles in Table 6-4	see pages 6-13 - 6-15
Chapter 6 Sites Inventory	Accessory Dwelling Units (ADU)	34	<p>The element projects 345 ADUs over the planning period or approximately 43 ADUs per year over the eight-year planning period. These trends are inconsistent with HCD records (6 reported in 2018, 17 in 2019, 7 in 2020, and 70 in 2021) and do not support an assumption of 43 ADUs per year. To support assumptions for ADUs in the planning period, the element should reduce the number of ADUs assumed per year and reconcile trends with HCD records, including additional information such as more recent permitted units and inquiries, resources and incentives, other relevant factors and modify policies and programs as appropriate. Further, programs should commit to additional incentives and strategies, frequent monitoring (every other year) and specific commitment to adopt alternative measures such as rezoning or amending the element within a specific time (e.g., 6 months) if needed. The element must also address affordability assumptions for ADU projections.</p>	Estimated ADU production has been revised to be consistent with HCDs feedback. <u>Monitoring program added.</u>	page 6-22
Chapter 6 Sites Inventory	AB 725	35	<p>For jurisdictions that are considered Metropolitan, the element must identify at least 25 percent of the remaining moderate and above moderate RHNA on sites that allow at least four units of housing (e.g., four plex or greater). (Gov. Code, § 65583.2, subd. (c)(4).)</p>	Of the 23 sites in the inventory, only the two San Marco sites allow less than four units of housing.	
Chapter 6 Sites Inventory	Quantified Objectives	36	<p>The element generally did not address this requirement. The element must include quantified objectives for construction, rehabilitation, and conservation by income group, including extremely low-income households. Please see the Building Blocks for additional information.</p>	Quantified objectives section added.	page 6-24

Chapter 3 Housing Constraints & Resources	Infrastructure	37	While the element includes a general discussion on water and sewer capacity, it must demonstrate sufficient existing or planned water and sewer capacity to accommodate the RHNA for the planning period and add or modify programs if necessary.	Mostly addressed in chapter 3 but also mentioned in chapter 6.	
Chapter 3 Housing Constraints & Resources	Environmental Constraints	38	While the element generally describes a few environmental conditions within the City, it must describe any other known environmental constraints or conditions within the City that could impact housing development in the planning period.	This section covered flooding, geology (earthquakes), noise, and air quality. Hazardous materials has been added to the discussion.	page 3-32
Chapter 3 Housing Constraints & Resources	Zoning for a Variety of Housing Types- Emergency Shelters	39	The element should describe the development standards of the M-1 zone that allows emergency shelters by-right and should provide an analysis of proximity to transportation and services for these sites, hazardous conditions, and any conditions in appropriate for human habitability. In addition, the element should describe how emergency shelter parking requirements comply with AB139/Government Code section 65583, subdivision (a)(4)(A) or include a program to comply with this requirement	Emergency Shelters: Allow sufficient parking to accommodate all staff working in the emergency shelter, provided that the standards do not require more parking for emergency shelters than other residential or commercial uses within the same zone, in compliance with Government Code Section 65583(a)(4)(A)(ii). Adopt development standards for emergency shelters and ensure they are consistent with State law per California Government Code Section 65583(a)(4)(A)(ii).	
Chapter 3 Housing Constraints & Resources	Zoning for a Variety of Housing Types- Transitional Supportive Housing	40	Transitional housing and supportive housing must be permitted as a residential use in all zones allowing residential uses and only subject to those restrictions that apply to other residential dwellings of the same type in the same zone. (Gov. Code, § 65583, subd. (c)(3).) The element must describe and analyze the City's transitional and supportive housing standards and codes and demonstrate consistency with Section 65583(c)(3) or add or revise programs to comply with the statutory requirements.	Pursuant to Government Code Section 65583, transitional and supportive housing types are required to be treated as residential uses and subject only to those restrictions that apply to other residential uses of the same type in the same zone. The Zoning Ordinance allows supportive and transitional housing in all residential districts and in all zones that allow multifamily and mixed use development including nonresidential zones, per	

				Government Code Sections 65583 and 65650. Program 21 include actions to comply with State Law regarding transitional and supportive housing types.	
Chapter 3 Housing Constraints & Resources	Zoning for a Variety of Housing Types- By-Right Permanent Supportive Housing	41	Supportive housing shall be a use by right in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses pursuant to Government Code section 65651. The element must demonstrate compliance with these requirements and include programs as appropriate.	These uses are defined as residential care facilities and are permitted in all zoning districts where housing is permitted.	page 3-13
Chapter 3 Housing Constraints & Resources	Zoning for a Variety of Housing Types- Low Barrier Navigation Centers	42	While the element includes a program to allow Low Barrier Navigation Centers, it is limited to emergency shelter zones. Low Barrier Navigation Centers shall be a use by-right in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses pursuant to Government Code section 65660. The element must demonstrate compliance with this requirement and include programs as appropriate.	Discussion added.	page 3-16
Chapter 3 Housing Constraints & Resources	Zoning for a Variety of Housing Types- Single Room Occupancy (SRO) Units	43	Single Room Occupancy (SRO) Units: The element must describe where SROs are allowed or add a program as appropriate.	Program added to allow SROs	page 3-17
Chapter 3 Housing Constraints & Resources	Zoning for a Variety of Housing Types- Employee Housing	44	The element must demonstrate the City's zoning is consistent with the Employee Housing Act (Health and Safety Code, § 17000 et seq.), specifically, sections 17021.5 and, if necessary, add or modify programs. Section 17021.5 requires employee housing for six or fewer employees to be treated as a single-family structure and permitted in the same manner as other dwellings of the same type in the same zone.	Employee Housing Consistent with Health and Safety Code Sections 17021.5 and 17021.6, employee housing is permitted by right in every residential zone, including single family zones. Additionally, in 2012, the City	page 3-17

				amended its Zoning Code definitions to define “family” to include employee housing.	
Chapter 3 Housing Constraints & Resources	Zoning for a Variety of Housing Types- Accessory Dwelling Units	45	While the City does have an ADU ordinance, it is currently under review by HCD for consistency with State ADU Law. HCD will provide communication of ADU compliance issues under a separate cover. If necessary, the element should add a program to update the City’s ADU ordinance to comply with state law.	City’s ADU ordinance has been forwarded to HCD for review.	
Chapter 3 Housing Constraints & Resources	Land Use Controls	46	The element must identify and analyze all relevant land use controls impacts as potential constraints on a variety of housing types. The analysis should analyze land use controls independently and cumulatively with other land use controls. The analysis should specifically address requirements related to parking, heights, lot coverage and limits on allowable densities. The analysis should address any impacts on cost, supply, housing choice, affordability, timing, approval certainty and ability to achieve maximum densities and include programs to address identified constraints. The element should analyze the interaction of the General Plan designation for high density residential allowing 24-40 dwelling units an acre, but the R-4 zoning district limits densities to 30 dwelling units an acre and whether the maximum density in the R-4 is a constraint. In addition, the element must analyze whether the garage setbacks apply to multifamily developments and whether they are a constraint on housing. On page 3-6, the element lists parking requirements for “general residential”; it should also clarify whether parking requirements for mixed-use zones differ than the general residential parking requirements and add a program as appropriate. Lastly, the element states that the full build-out of the sites located in the TCP would exceed the maximum of 1,610 units allowed under the current Environmental Impact Report (EIR). The element must analyze whether exceeding the allowed units is a constraint and either adjust capacity assumptions or add programs as appropriate.		
Chapter 3 Housing Constraints & Resources	Fees and Exaction	47	While the element describes many fees and the typical deposit range, it must describe all required fees for single family and multifamily housing development, including all impact and regional fees, and analyze their impact as potential constraints on housing supply and affordability. In addition, the analysis should identify the total amount	Table 3-10 includes all required fees for SFD and MFD project types. A separate section on Impact Fees has been added but	page 3-24

			of fees and their proportion to the development costs for both single family and multifamily housing.	these fees are included in the amounts shown in the table.	
Chapter 3 Housing Constraints & Resources	Local Processing and Permit Procedures	48	While the element includes information about processing times, it should also describe the procedures for a typical single family and multifamily development. The analysis should address the approval body, the number of public hearing if any, approval findings and any other relevant information. The analysis should address impacts on housing cost, supply, timing, and approval certainty.	Section added.	page 3-9
Chapter 3 Housing Constraints & Resources	Design Review	49	The element must describe and analyze the design review guidelines and process, including approval procedures and decision-making criteria, for their impact as potential constraints on housing supply and affordability. For example, the analysis could describe required findings and discuss whether objective standards and guidelines improve development certainty and mitigate cost impacts. The element must demonstrate this process is not a constraint or it must include a program to address this permitting requirement, as appropriate.		
Chapter 3 Housing Constraints & Resources	State Density Bonus Law	50	The City's current density bonus ordinance should be reviewed for compliance with current state density bonus law and programs should be added as necessary. (Gov. Code, § 65915.)	The city's density bonus ord. was updated in 2021 and is consistent with state law. Density bonus section discussion has been added.	page 3-19
Chapter 3 Housing Constraints & Resources	Streamlining Provisions	51	While the element states that they followed SB 35 procedures for a prior project, it should clarify whether the City has procedures in place consistent with streamlining procedures pursuant to Government Code section 65913.4 and include programs as appropriate.	The City will comply with SB 35 (Gov. Code Section 65913.4) by maintaining a written policy and procedure, as well as other guidance as appropriate, to streamline the approval process and standards for eligible projects. A program has been added to complete this work within one year of HE adoption.	page 3-19

Chapter 3 Housing Constraints & Resources	On/Off-Site Improvements	52	The element must identify typical subdivision level improvement requirements, such as minimum street widths (e.g., 40-foot minimum street width), and analyze their impact as potential constraints on housing supply and affordability.	Subdivision improvements included with off-site improvements.	page 3-20
Chapter 3 Housing Constraints & Resources	Constraints on Housing for Persons with Disabilities	53	The element identifies approval findings for granting a reasonable accommodation including finding related to impacts on surrounding uses – essentially a conditional use permit finding. However, reasonable accommodation should be a unique exception process from a conditional use permit, especially given its importance in addressing barriers to housing for persons with disabilities. The element should include a program to amend the Reasonable Accommodation Ordinance and remove constraints, including but not limited to the “potential impact on surrounding uses” approval finding. In addition, while the element states that unlicensed residential care facilities must require a license from the state licensing agency before operation, zoning and standards should simply implement a barrier-free definition of family instead of subjecting, potentially persons with disabilities, to special regulations. Zoning code regulations that isolate and regulate various types of housing for persons with disabilities may pose a constraint on housing choice for persons with disabilities. The element should include specific analysis of these and any other constraints for impacts on housing for persons with disabilities and add or modify programs as appropriate. Lastly, the element must describe and analyze any definitions of family used in zoning and land use for impacts on housing for persons with disabilities and add or modify programs as appropriate.	A program to update the city's reasonable accommodation findings was added to Chapter 7.	See program 4-D on page 7-23.
Chapter 3 Housing Constraints & Resources	Availability of Financing	54	The element must describe the availability of financing, including private financing and government assistance programs, is generally available in the community.	Homeownership financing and affordable housing financing added.	pages 3-27, 3-28
Chapter 3 Housing Constraints & Resources	Developed Densities and Permit Times	55	The element must be revised to include analysis of requests to develop housing at densities below those anticipated, and the length of time between receiving approval for a housing development and submittal of an application for building permits that potentially hinder the construction of a locality's share of the regional housing need.	Permitting times and Development density sections added	pages 3-7, 3-24 - 3-25

Chapter 7 Programs	Program 1-E & 1-F	56	Programs 1-E (Publicly Post Status Updates) and 1-F (Consolidate Fee Schedules): These programs should clarify how often the listings will be updated.	Programs updated.	pp. 7-4 ; same program label
Chapter 7 Programs	Programs 2-A, 2-E, 3-B, 4-A, 4-E, 5-B, 8-A	57	Program 2-A (Study the South El Camino Real Corridor), 2-E (SB 9 Implementation Guidelines), 3-B (Displaced Residents), 4-A (Reasonable Accommodations), 4-E (Home Sharing Opportunities), 5-B (Affordable Housing Fund Resources), 8-A (Create an Affirmative Marketing Strategy): These programs should include proactive outreach and specify how often it will occur throughout the planning period.	All programs have been updated to include outreach component and frequency. Some of the goals and programs were reorganized, the new program reference numbers are listed in the following column.	Former 2-A was incorporated into an action item in former 2-B and 2-B was relabeled as 2-A. Former 3B is New 4-G; Former 4-A is an action item in the New 4-C; Former 4-E is New 4-M; Former 5-B is New 3-B; Former 8-A is an action item under New 4-A
Chapter 7 Programs	Program 2-B	58	Program 2-B (Evaluate Ballot Initiative): This program should include public outreach. In addition, the program must be implemented earlier in the planning period to ensure beneficial impact and include specific commitment to the action.	Included outreach component and reduced timeframe for implementation by half. This program was expanded to include six specific actions and it was also combined with Program 2A (Study the El Camino Corridor) which was closely related.	pp. 7-6; program 2-A and 2-B combined into current program 2-A
Chapter 7 Programs	Program 2-C	59	Program 2-C (Support Development of Housing Opportunity Sites): This program should clarify how often outreach will occur and whether incentives will be provided.	Outreach information and incentive information included.	pp. 7-6; program is now 2-B
Chapter 7 Programs	Program 2-G	60	Program 2-G (Publicize Affordable Housing Financing Strategies): The program should clarify how often outreach will occur and sources will be updated.	Programs updated with frequency information.	pp.7-8; program is now 2-F
Chapter 7 Programs	Program 4-B	61	Program 4-B (Fair Housing Training for Landlords and Tenants): This program should commit to additional trainings during the planning period.	Program updated to minimum of one training per year.	pp. 22 Same program label

Chapter 7 Programs	Program 4-C	62	Program 4-C (Publicize Affordable Housing Financing Strategies): The program should clarify how often outreach and coordination will occur. In addition, it should include timing of when the in-lieu fee strategy will be developed.	Programs updated with frequency information and timing for in lieu fee strategy.	Former 4-B is New 2-F
Chapter 7 Programs	Program 4-D	63	Program 4-D (Nexus Study for Affordable Housing Program): The program should include an action and timing to implement the results of the study.	Added implementation action item and timeframe for implementation	Former 4-D is New 2-I; the language in 2-I was edited and includes former 4-D
Chapter 7 Programs	Program 4-G	64	Program 4-G (Affordable Unit Set-Aside): The program should include implementation beyond research as well as include proactive outreach.	Implementation, outreach, and timeframes have been added.	Former 4-G is New 4-O
Chapter 7 Programs	Program 4-I	65	Program 4-I (Increase Supply of Housing for Large Families): The program should clarify what actions will be taken to encourage large units, such as incentives. The element should also include outreach to developers	This program was added into new program 2-F on providing housing for residents with disproportionate housing needs and ELIs. Outreach info added. Some options for incentives were added but will be further considered.	Former 4-I is New Action Item under 2-F.
Chapter 7 Programs	Program 5-C	66	Program 5-C (Revise Affordable Housing Ordinance): The program should include back-up actions if the existing action is deemed infeasible.	Back up action and timing included.	Former 5-C is New 3-C
Chapter 7 Programs	Program 5-D	67	Program 5-D (Retain Public Land): This program should clarify what is being implemented and include timing.	Program clarified and timing included.	Former 5-D is New 3-D
Chapter 7 Programs	Program 5-E	68	Program 5-E (Expedite Review of 100% Affordable Housing Projects): The program should clarify what the timing is tied to if the program is continuing.	Revised program, this is a continuing program.	Former 5-E is incorporated into 1-C. Former 5-E and 1-C were similar programs. This is also an action item under 2-G (Encourage production of ELIs)
Chapter 7 Programs	Program 6-A	69	Program 6-A (Replacement of Below Market Rate Units): The timing of this program should be earlier in the planning period to ensure beneficial impact.	Timing updated from three years to one and a half years from certification.	Former 6-A is New 3-G

Chapter 7 Programs	Program 8-B	70	Program 8-B (Partner with Local Fair Housing Organizations): The program should include timing of how often training will occur.	Added timing of at least annually.	Former 8-B is New 4-B
Chapter 7 Programs	Program 2-F (Require a minimum of 1,000 Housing Units on Tanforan Mall Project):	71	This program should clarify whether incentives will be provided for affordable units, what actions will be implemented to ensure a set aside for persons with disabilities, how often outreach will occur, and clarify what will be implemented within the identified timeframe.	Information was added. See note.	pp. 7-8; see programs 2-F and 4-O
Chapter 7 Programs	Program 2-H (Release RFP for City-Owned Sites)	72	The element identified City-owned sites to accommodate a portion of the RHNA. The element should include a program with numerical objectives that ensures compliance with the Surplus Land Act, provides incentives and actions along with a schedule to facilitate development of City-owned sites. Actions should include outreach with developers, issuing requests for proposals, incentives, fee waivers, priority processing and financial assistance. In addition, a similar program should be added for school owned sites.	Expanded this program to include these items as a part of the housing development feasibility study. No program was added for school owned sites specifically because these sites have already completed the disposition process and have submitted development applications to the city.	Program 2-I
Chapter 7 Programs	ADD NEW PROGRAM	73	The element must include a program(s) with specific actions and timelines to assist in the development of housing for extremely low-income households. The program(s) could commit the City to adopting priority processing, granting fee waivers or deferrals, modifying development standards, granting concessions and incentives for housing developments that include units affordable to extremely low-income households; assisting, supporting or pursuing funding applications; and outreach and coordination with affordable housing developers.	Two new programs added.	Program 2-G and Program 2-H
Chapter 7 Programs	ADD NEW PROGRAM	74	The element must also include a program(s) to assist in the development of housing for all special needs households (e.g., elderly, homeless, farmworkers, persons with disabilities, female-headed households). Program actions could include proactive outreach and assistance to non-profit service providers and developers, prioritizing some funding for housing developments affordable to special needs households and offering financial	New program added.	Program 2-F

			incentives or regulatory concessions to encourage a variety of housing types.			
Chapter 7 Programs	Programs 2-A and 2-B HEIGHTS	75	Heights: Programs to address restrictions on heights (Programs 2-A and 2-B) should specifically commit to take an initiative to the ballot by a specified date and complete alternative actions by a specific date if the ballot initiative is not passed.	Program expanded with additional detail. No backup plan needed because these units are not needed to meet our RHNA.	Program 1-L	
Chapter 7 Programs	Short Term Rentals	76	Short Term Rentals: As noted in the element, a program should be added or modified to conduct research and take action as appropriate by a specified date.	New program added.	Program 1-H	
Chapter 7 Programs	ADD NEW PROGRAM	77	The element must include a program(s) to conserve and improve the condition of the existing stock, which may include addressing the loss of dwelling units. A program could provide grants for substantial rehabilitation, provide matching grants for homeowner improvements, or implement proactive code enforcement program.	Added program- see 3-E	Program 3-E	
Chapter 7 Programs	Program 4-H (Promote Accessory Dwelling Unit Ordinance):	78	The program should include proactive outreach throughout the planning period. In addition, the program should include incentives beyond the City's ordinance and webpage and commit to monitor permitted ADUs and affordability every other year and take appropriate action such as adjusting assumptions or rezoning within a specified time (e.g., 6 months) if assumptions are not realized.	This is program 4-P- revised to incorporate comments.	Former Program 4-H is new Program 4-P. Program was revised.	
Chapter 7 Programs	General Comment	79	As noted in Finding B3, the element does not include a complete site analysis; therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the City may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types.	Site analysis completed. New programs added.	New program 2-A (former 2-A and 2-B) was revised with new action items. New programs 2-G, 2-H, 2-I and 2-K.	

Chapter 7 Programs	Shortfall of Adequate Sites	80	If the element does not identify adequate sites to accommodate the regional housing need for lower-income households, it must include a program(s) to identify sites with appropriate zoning to accommodate the regional housing need within the planning period. The program should identify the shortfall by income group, acreage, allowable densities, appropriate development standards and meet all by right requirements pursuant to Government Code section 65583.2, subdivisions (h) and (i), including but not limited to permitting multifamily uses by-right for developments in which 20 percent or more of the units are affordable to lower income households.	Draft Element submitted to HCD identified adequate sites to accommodate the regional housing need for lower income households.	No additional program required.
Chapter 7 Programs	General Comment	81	As noted in Findings B4 and B5, the element requires a complete analysis of potential governmental and non-governmental constraints. Depending upon the results of that analysis, the City may need to revise or add programs and address and remove or mitigate any identified constraints.	Analysis completed and new programs added.	New programs added 1-H, 3-E, 3-G and 3-H.
Chapter 7 Programs	General Comment	82	As noted in Finding B1, the element must include a complete analysis of Affirmatively Furthering Fair Housing (AFFH). The element must be revised to add goals and actions based on the outcomes of a complete analysis. Goals and actions must specifically respond to the analysis and to the identified and prioritized contributing factors to fair housing issues and must be significant and meaningful enough to overcome identified patterns and trends.	Analysis completed and new programs added.	New AFFH Programs added 4-E, 4-H, 4-I, 4-K, 4-O, 4-L, 4-Q, 4-R, and 4-S.
Chapter 5 Public Participation	Translation Services	83	While the element includes a summary of participation including outreach to the community, it must also describe whether translation services were available during public participation including, but not limited to, public workshops, Planning Commission, and City Council meetings.	Materials that were distributed were translated into Spanish and the city website uses a translation plug-in for translating content. Translation services were available at 21 Elements meetings but not available at local meetings.	

Chapter 1 Introduction	Consistency with the General Plan	84	While the element discusses how internal consistency will be achieved with other elements of the general plan as part of the housing element update, it should also discuss how internal consistency will be maintained throughout the planning period.	General Plan language added.	page 1-5
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Exhibit D

GENERAL PLAN AMENDMENT TO POLICY HS-40

General Plan Policy	Existing Policy Language	Proposed Policy Amendment
HS-40	Prohibit new residential development within the 70+ Airport CNEL areas, as dictated by Airport Land Use Commission infill criteria.	Prohibit new residential development within the 70+ Airport CNEL areas, as dictated by Airport land Use Commission infill criteria, <u>unless, on a project by project basis, a proposed residential development is approved through the Local Agency Override process consistent with the Public Utilities Code Section 21675.1(d).</u>