



Initial Study

Jefferson High Staff Housing Project

Prepared by



In Consultation with



November 2019

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- | | | |
|--|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input checked="" type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input checked="" type="checkbox"/> Geology / Soils | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards & Hazardous Materials |
| <input type="checkbox"/> Hydrology / Water Quality | <input type="checkbox"/> Land Use / Planning | <input type="checkbox"/> Mineral Resources |
| <input checked="" type="checkbox"/> Noise | <input type="checkbox"/> Population / Housing | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input checked="" type="checkbox"/> Transportation/Traffic | <input type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities / Service Systems | <input type="checkbox"/> Wildfire | <input type="checkbox"/> Mandatory Findings of Significance |

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.


Signature

11/14/19
Date

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SECTION 1.0 INTRODUCTION AND PURPOSE

1.1 PURPOSE OF THE INITIAL STUDY

The City of Daly City, as the Lead Agency, has prepared this Initial Study for the Jefferson Union High School Faculty and Staff Housing 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 Daly City, California.

The project proposes to construct a 122-unit multi-family residential development and a car barn¹. This Initial Study evaluates the environmental impacts that might reasonably be anticipated to result from implementation of the proposed project.

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:

City of Daly City
Department of Economic and Community Development
333 90th Street
Daly City, CA 94015

Carmelisa Morales, Associate Planner
(650) 991-8156
cmorales@dalycity.org

1.3 CONSIDERATION OF THE INITIAL STUDY AND PROJECT

Following the conclusion of the public review period, the City of Daly City 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 Daly City 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)).

¹ The car barn is a parking garage that would operate with a lift system.

SECTION 2.0 PROJECT INFORMATION

2.1 PROJECT TITLE

Jefferson Union High School Faculty and Staff Housing Project

2.2 LEAD AGENCY CONTACT

City of Daly City
Department of Economic and Community Development
333 90th Street
Daly City, CA 94015

Carmelisa Morales, Associate Planner
(650) 991-8156
cmorales@dalycity.org

2.3 PROJECT APPLICANT

Jefferson Union High School District

2.4 PROJECT LOCATION

The approximately 3.9-acre site comprises the northwest corner of the total 22.3-acre Jefferson Union High School District campus at 699 Serramonte Boulevard. The project is bounded by Serramonte Boulevard to the north, Callan Boulevard to the east, is approximately 0.25-mile from Hickey Boulevard to the southeast, and St. Francis Boulevard to the west. Regional and vicinity maps of the project site are shown in Figures 2.0-1 and 2.0-2. An aerial photograph showing surrounding land uses is shown on Figure 2.0-3.

2.5 ASSESSOR'S PARCEL NUMBER

APN: 091-211-230

2.6 GENERAL PLAN DESIGNATION AND ZONING DISTRICT

General Plan: The General Plan designates the property as *Commercial - Office (C-O)* which allows for office and locally-serving office commercial uses.

Zoning: The project is zoned as Planned Development PD-31, which allows for development of office and residential.

2.7 PROJECT-RELATED APPROVALS, AGREEMENTS, AND PERMITS

- Environmental Review
- General Plan Amendment
- Planned Development Zoning Amendment
- Design Review

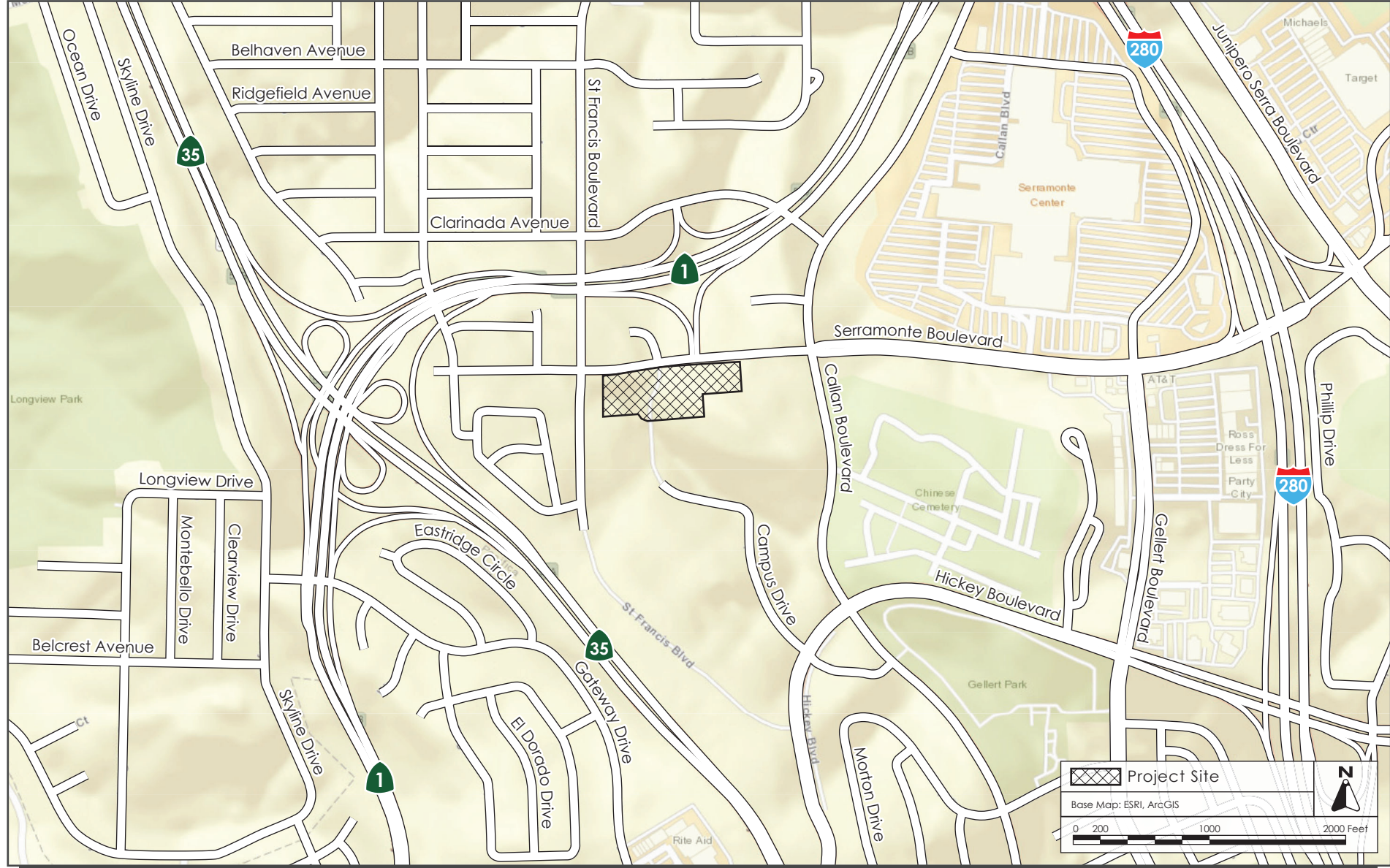
- Building and Grading Permits

Additionally, the project may require a Caltrans Encroachment Permit for improvements to an intersection under Caltrans' jurisdiction.



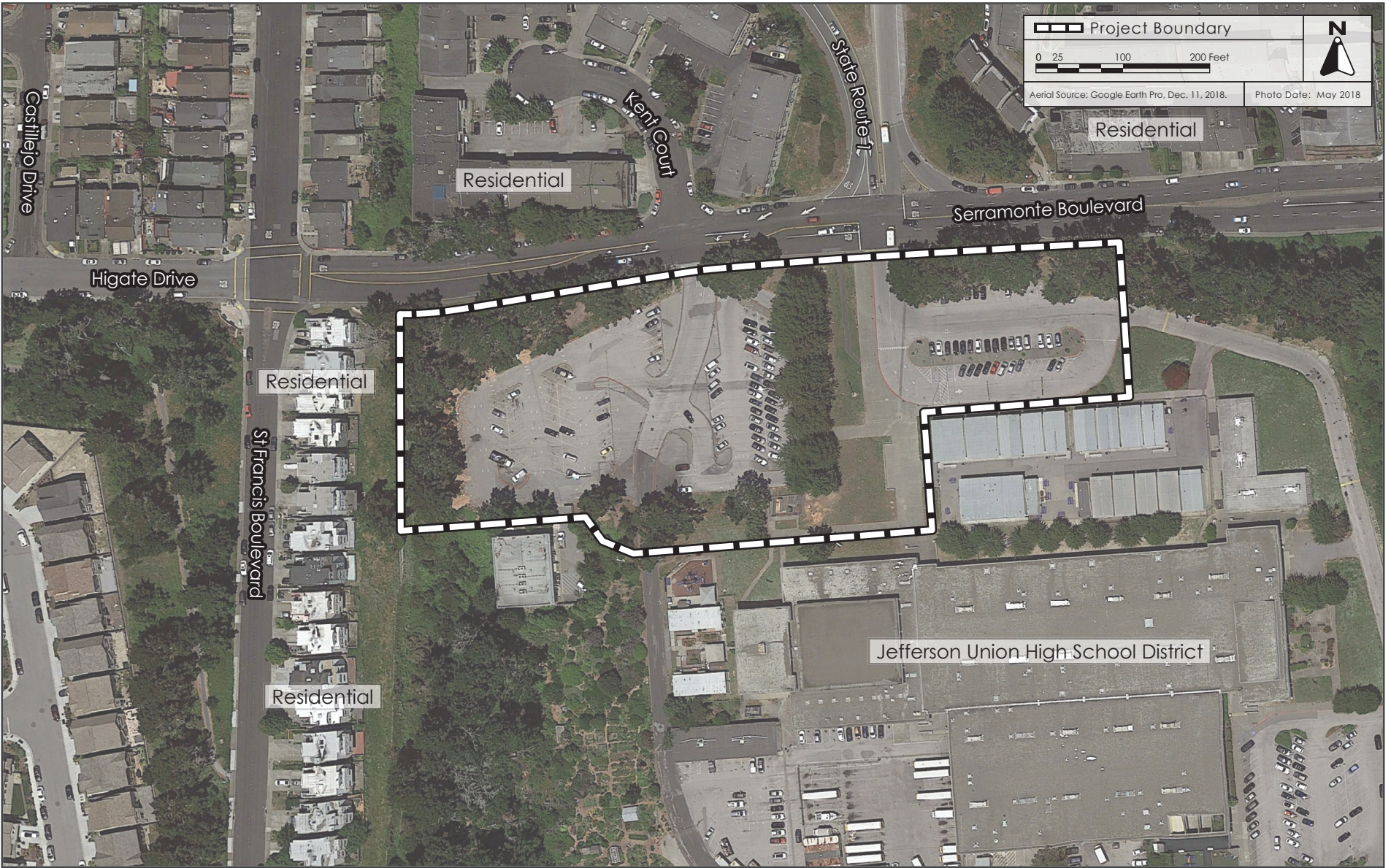
REGIONAL MAP

FIGURE 2.0-1



VICINITY MAP

FIGURE 2.0-2



AERIAL PHOTOGRAPH AND SURROUNDING LAND USES

FIGURE 2.0-3

SECTION 3.0 PROJECT DESCRIPTION

3.1 PROPOSED DEVELOPMENT

The applicant, Jefferson Union High School District (JUHSD), proposes to develop 122 multi-family units on an approximately 3.9-acre site. The proposed project is comprised of a single four-story building that surrounds a central courtyard (refer to Figure 3.0-1). The proposed project would provide 58 parking spaces in the western parking lot and 64 parking spaces in an automated lift car barn also located in the western parking lot. Five parking spaces would be provided along the access roadway immediately to the south of the proposed housing, and an additional eight spaces would be provided north of the existing school building entrance. The eastern parking lot would be restriped and provide 48 parking spaces. The total number of parking spaces dedicated to the development is 183 spaces.

The 144,384 s.f. proposed multi-family development would include 55 one-bedroom units ranging from approximately 615 to 760 square feet (s.f.), 61 two-bedroom units ranging from approximately 850 to 1,000 s.f., and six three-bedroom units ranging from approximately 1,060 to 1,250 s.f. in size. Due to the change in elevation on the property, there would be 25 residential units located on the ground floor. The proposed development would also include amenities such as bicycle storage, daycare, co-working space, community room, laundry room, fitness room, and management office on the ground floor (refer to Figure 3.0-2). The remaining 97 residential units would be on the second through fourth floors (refer to Figure 3.0-3).

3.1.1 Building Heights and Setbacks

The u-shaped residential building would be set back approximately 20 to 50 feet from the northern property line. The proposed western parking lot would be set back approximately 50 feet from the western property line. The maximum height of the building and car barn would be approximately 48 feet and 26 feet from the ground floor, respectively (refer to Figures 3.0-4 and 3.0-5).

3.1.2 Site Access and Circulation

Vehicular access to the development would be provided from a primary entrance off of Serramonte Boulevard. The primary driveway would be constructed as a loop road that serves as an egress and ingress. The existing driveway off of Serramonte Boulevard would be closed and Campus Drive would be re-routed to connect to the main driveway. Three on-site walkways connect to Serramonte Boulevard at the northeast corner of the site. Walkways would be constructed along the perimeter of the site, between the buildings on site, and fronting the west parking lot. Crosswalks would be provided across the north-south drive aisle, connecting the residences on the west side to the east parking lot.

3.1.3 Open Space and Landscaping

The project site is currently developed with a parking lot and contains numerous mature trees on-site. The project proposes to remove approximately 90 trees and plant approximately 87 trees around the

site perimeter and in the courtyard area (refer to Figure 3.0-6). The proposed development would include a total open space area of 21,123 square feet.

3.1.4 Construction Schedule

The construction schedule assumes that the project would be built out over a period of approximately 13 months beginning in 2020. The project would be constructed in six different phases: paving demolition, site preparation, grading, building construction, paving, architectural coating. The demolition phase would take approximately 20 days. The site preparation phase would take approximately five days. The grading phase would take approximately eight days. The building construction phase would take approximately 230 days (eight months). The paving phase would take approximately 18 days. The architectural coating phase would take approximately 18 days.

3.1.5 Utility, Drainage, and Off-Site Improvements

The project would connect to existing utilities located in Serramonte Boulevard. The project does not propose to improve any of the other existing utilities serving the site. The proposed drainage system will consist of area drains, drop inlets, manholes, stormwater treatment areas with an overflow structure, and below-grade pipes. The drainage system will convey runoff to the existing outfall located near the main vehicular entrance.

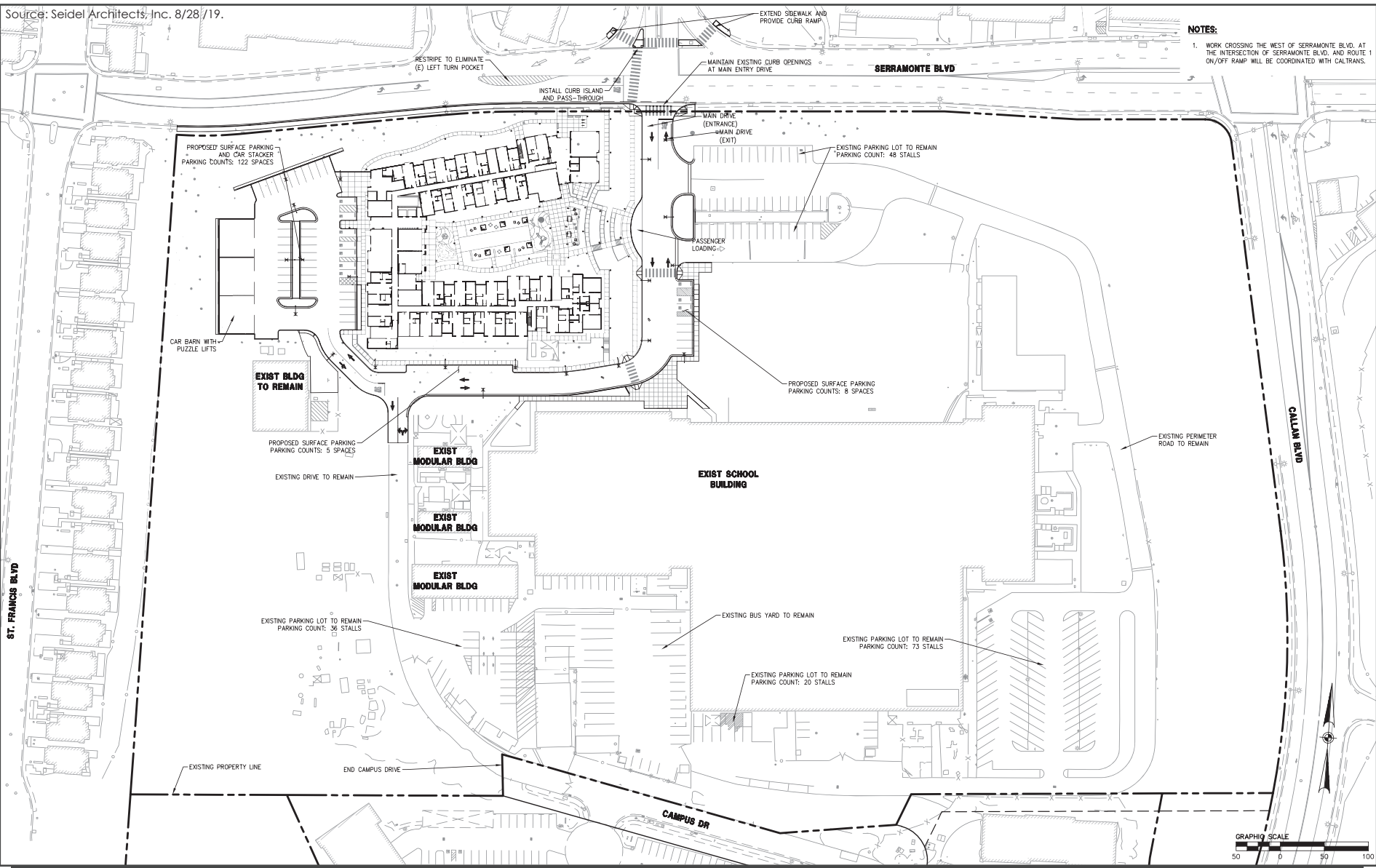
The existing bus stop along the site frontage (on the south side of Serramonte Boulevard) west of the site driveway does not currently provide a bench or shelter. In order to encourage transit usage, and as part of the project's enhancement to the site's frontage along Serramonte Boulevard, the project would install a bus shelter or bench.

At the Serramonte Boulevard/SR 1 ramps intersection, the project would improve pedestrian access between the existing bus stop and the project site by contributing to the installation of a traffic signal, by extending sidewalks, installing curb ramps and curb islands, and pedestrian crosswalks at this intersection. These improvements would require an Encroachment Permit from Caltrans and approval by the City.

3.2 PROPOSED REZONING AND GENERAL PLAN AMENDMENTS

The project site is located at the northwest corner of the Serramonte del Ray campus at 699 Serramonte Boulevard. The project site is designated in the General Plan as *Commercial - Office*, which allows for office and locally-serving office commercial uses. The project proposes a General Plan Amendment to change the designation to *Residential - High Density* which allows residential development of up to 50 dwellings units per acre. The current designation of *Commercial - Office* allows for administrative and professional offices, banks, real estate and title company offices, travel agencies, and photo-copying services with a minimum FAR of 2,500 to 3,000 square feet. The site is currently zoned as Planned Development PD-31 which allows for development of office and residential. The project would amend Planned Development PD-31 to allow for the proposed 122-unit residential development.

Source: Seidel Architects, Inc. 8/28 /19.



NOTES:
1. WORK CROSSING THE WEST OF SERRAMONTE BLVD. AT THE INTERSECTION OF SERRAMONTE BLVD. AND ROUTE 1 ON/OFF RAMP WILL BE COORDINATED WITH CALTRANS.

PROPOSED SITE PLAN

FIGURE 3.0-1

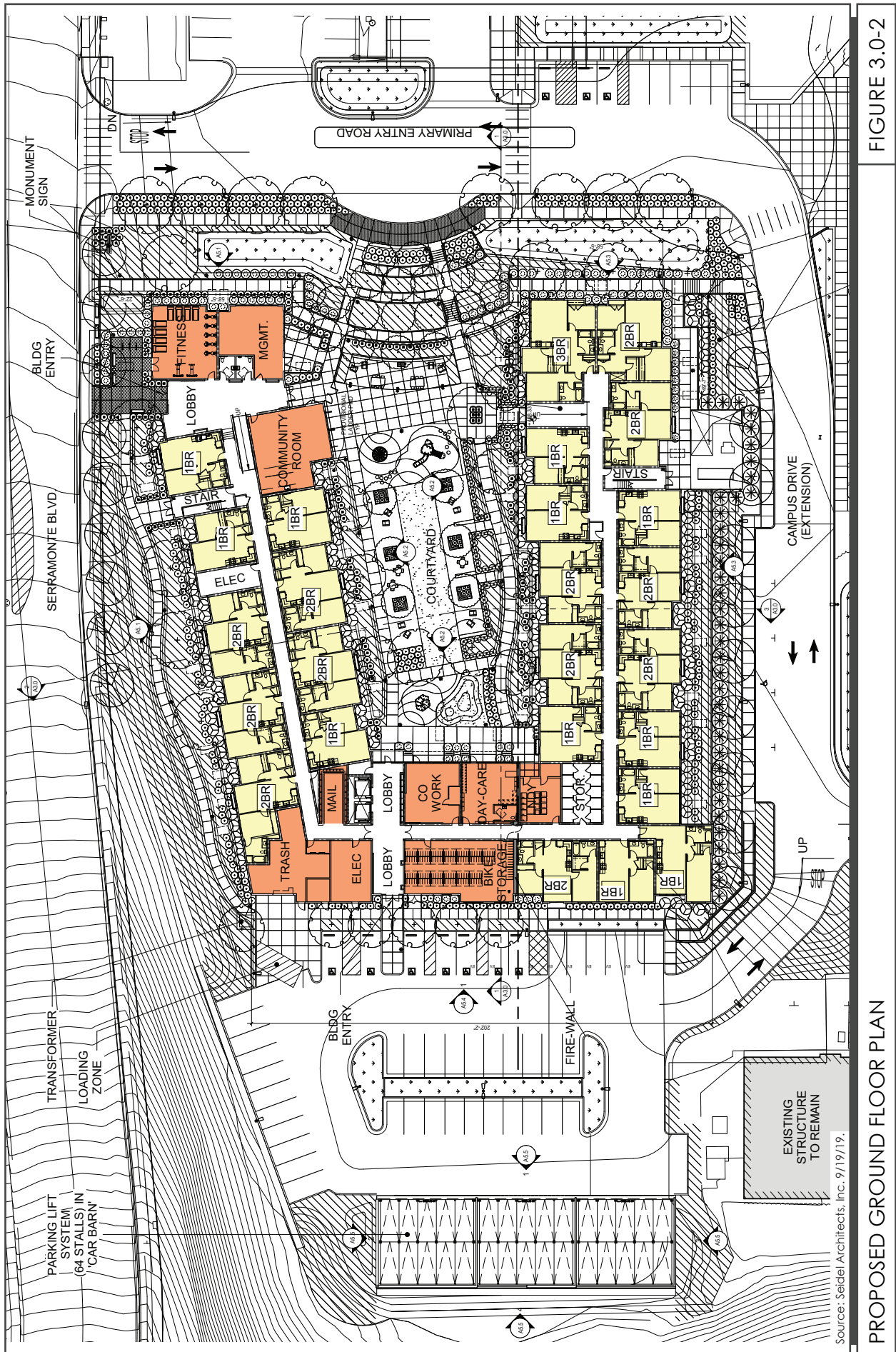


FIGURE 3.0-2

PROPOSED GROUND FLOOR PLAN



Source: Seidel Architects, Inc. 6/14/19.

PROPOSED SECOND FLOOR PLAN

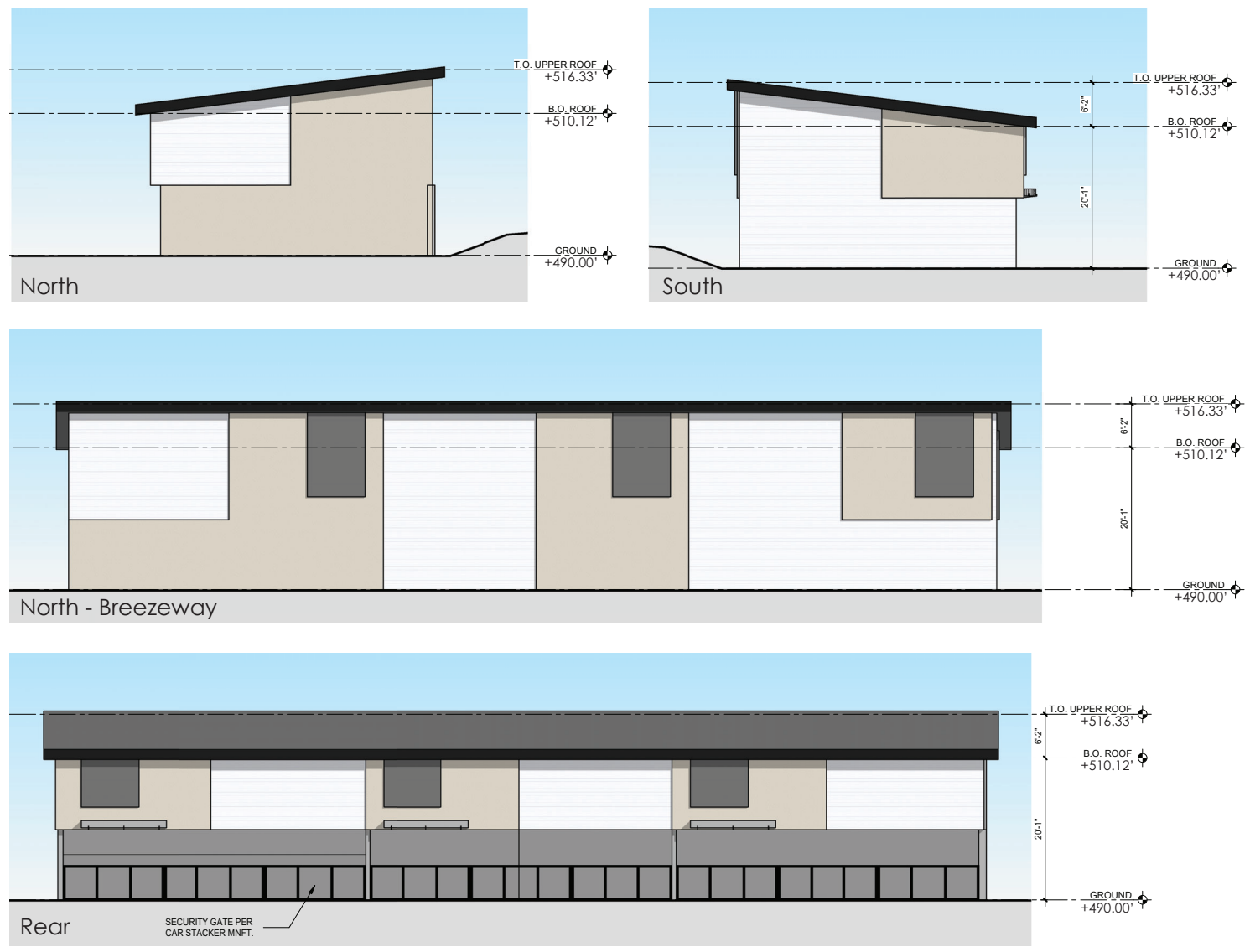
FIGURE 3.0-3



Source: Seidel Architects, Inc. 6/14/19.

PROPOSED RESIDENTIAL BUILDING ELEVATIONS

FIGURE 3.0-4



Source: Seidel Architects, Inc. 6/14/19.

PROPOSED CAR BARN ELEVATIONS

FIGURE 3.0-5



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*

City of Daly City General Plan

The City of Daly City General Plan includes a Visual Quality section under the Resources Management Element. General Plan policies and tasks relevant to the project with regards to aesthetics are listed below.

Policy	Description
Task CE-20.7	As a part of all new development, require, where appropriate, the provision of pedestrian-oriented signs, pedestrian-scaled lighting, benches, and other street furniture so as to make non-motorized forms of travel comfortable and attractive alternatives to the automobile. Where necessary in new development, the City may require additional sidewalk and/or right-of-way width to accommodate these amenities.
Policy LU-16	Regulate of the size, quantity, and location of signs to maintain and enhance the visual appearance of Daly City.
Policy RME-20	Recognize the physical differences between different parts of the City and regulate land uses within these areas accordingly.
Task RME-20.4	Incorporate design features in new development that reflect the character of the neighborhood, to ensure that new construction is compatible with existing development.
Policy LU-17	Ensure that private development is responsible for providing any on-or off-site improvements related to and/or mitigating the impacts it causes.

4.1.1.2 *Existing Conditions*

The 3.9-acre project site comprises the northwest corner of the Jefferson Union High School District and is located in an urban area of Daly City. The project site is bounded by Serramonte Boulevard and a residential neighborhood to the north and northeast, Callan Boulevard to the east, the Jefferson High School District campus to south and southeast, and a residential neighborhood to the west.

The project site is located on a paved parking lot and is mostly visible from surrounding roadways (e.g., Serramonte Boulevard, St. Francis Boulevard). Views of the project site and area are shown in Photos 1-6, below.

Surrounding Visual Character

As described above, the project site is surrounded by development. A residential neighborhood is located to the north, northeast, and west of the project site. The two- and three-story residences surrounding the property are comprised of concrete and gable-style roofs. The remainder of the Jefferson High School District campus is located to the south and southeast of the property and is comprised of one-story and two-story, concrete buildings (refer to Photos 1 through 6).



Photo 1: View of the project site from Serramonte Boulevard facing south.



Photo 2: View of the project driveway and eastern parking lot looking northeast.

PHOTOS 1 & 2



Photo 3: View of the paved parking lot that would be redeveloped with the multi-family residential structure facing west.



Photo 4: View of the paved parking lot and adjacent structures to remain facing southeast.

PHOTOS 3 & 4



Photo 5: View of the Serramonte Boulevard and SR 1 intersection, with the project site to the southeast.



Photo 6: View of the residential building to the northwest of the project site.

PHOTOS 5 & 6

Scenic Vistas and Resources

San Bruno Mountain reaches approximately 1,000 feet in elevation and is visible from various locations throughout the City, including the project site. Views of the coastline are not visible from the project site. The project site is comprised of two surface parking lots and no scenic resources, such as rock outcroppings or historic buildings (refer to Section 4.5 Cultural Resources), are present on the site or in the project area, other than numerous mature trees.

The California Scenic Highways Program, maintained by the California Department of Transportation (Caltrans), designates scenic highways and routes with the intention of protecting and enhancing the scenic beauty of the highways, routes, and adjacent corridors. Designation ensures that new development projects along recognized scenic corridors are designed to maintain the route's scenic potential. There are three eligible State scenic highways within the City of Daly City, although none are officially designated; Skyline Boulevard (State Route (SR) 35), Cabrillo Highway (SR 1), and Junipero Serra (Interstate 280 (I-280)). Scenic potential along these corridors is related to the views of the coast and San Bruno Mountain. SR 1 runs west and north of the project site and provides oblique views of the project site and San Bruno Mountain.

The project site is not visible from any state or County designated scenic highways or roadways.

4.1.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<hr/> 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) Substantially degrade the existing visual character or quality of public views ¹ of the site and its surroundings? 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)

The City's General Plan does not identify any State or County designated scenic highways located in Daly City. However, several roadways have been recognized as having scenic quality. The General Plan identifies John Daly and Lake Merced Boulevard as scenic corridors, however, these roadways are not located within the vicinity of the project site. There are three eligible State scenic highways within the City of Daly City, though none are officially designated. These highways include Skyline Boulevard (SR 35), Cabrillo Highway (SR 1), and Junipero Serra (I-280). Scenic potential along these corridors is related to the views of the coast and San Bruno Mountain. State Route 1 runs west and north of the project site and provides views of San Bruno Mountain and oblique views of the project site.

The proposed residential building would not obscure views of San Bruno Mountain or the coast from SR-1. The property is not visible from SR 35 or I-280. **(Less Than Significant Impact)**

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 are three eligible State scenic highways within the City of Daly City, though none are officially designated. These highways include Skyline Boulevard (SR 35), Cabrillo Highway (SR 1), and Junipero Serra (I-280).

Scenic resources, such as rock outcroppings or historic buildings, are not present on the project site. The trees to be removed as part of the project are common and unremarkable visually. The project would plant 87 replacement trees throughout the site and around the perimeter of the property. The project site is not located along a state scenic highway or a rural scenic corridor. The proposed project would result in a less than significant impact to scenic resources. **(Less Than Significant Impact)**

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)

The project site is comprised of two paved parking lots on a school district campus. The proposed project is surrounded by residential development to the north, south, and west. The proposed development would be up to 48 feet in height which would be minimized by the existing sloped topography of the site area. The adjacent residential structures to the northeast are three stories and would appear to be of similar scale to the proposed development. For these reasons, the project would maintain the visual characteristics of the residential neighborhood and not degrade the existing visual character of the site or project area. **(Less than Significant Impact)**

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)**

Since the City of Daly City is primarily built out, the light and glare that exists within the city is typical of that in an urban setting. Nighttime lighting impacts are considered significant when they interfere with or intrude into neighboring residences. Light pollution is typically related to the use of high voltage light fixtures with inadequate shields and improper positioning or orientation. Compliance with the Design Review process outlined in the City's Zoning Ordinance, which requires that general architectural considerations such as exterior lighting are compatible with the design and character of other adjacent buildings, and proposed General Plan policies requiring design compatibility will reduce light and glare impacts to less than significant. The project is itself a residential project, and nighttime lighting will need to be designed and managed to avoid disrupting project residents as well. For these reasons, the proposed project would not result in significant light and glare impacts. **(Less Than Significant Impact)**

4.2 AGRICULTURE AND FORESTRY RESOURCES

4.2.1 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"/>

Impact AG-1: The project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use. **(No Impact)**

According to the *San Mateo County Important Farmland 2016* map, the project site is designated as *Urban and Built-Up Land*, meaning that the land contains a building density of at least six units per 10-acre parcel or is used for industrial or commercial purposes, golf courses, landfills, airports, or other utilities.² Therefore, the proposed project would not convert farmland to a non-agricultural use. **(No Impact)**

Impact AG-2: The project would not conflict with existing zoning for agricultural use, or a Williamson Act contract. **(No Impact)**

² California Department of Conservation, Division of Land Resource Protection. *San Mateo County Important Farmland 2016 Map*. February 2018.

The project site is located in an urbanized area in the City of Daly City. The project site does not include active agricultural uses, nor is the site zoned for agricultural uses. Therefore, the proposed project would have no impact on agricultural resources or operations. **(No Impact)**

Impact AG-3: The project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production. **(No Impact)**

“Forest land” is defined as land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits. “Timberland” means land, other than land owned by the federal government and land designated by the board as experimental forest land, which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees.

The project site and surrounding area is not used or zoned for timberland or forest land. Therefore, the project would not impact timberland or forest land. **(No Impact)**

Impact AG-4: The project would not result in a loss of forest land or conversion of forest land to non-forest use. **(No Impact)**

Please see discussion under Impact AG-3, above. **(No Impact)**

Impact AG-5: The project would not 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. **(No Impact)**

According to the San Mateo County Important Farmland 2014 map, the project site and surrounding area are designated as *Urban and Built-Up Land*. The development of the project site would not result in conversion of any forest or farmlands. **(No Impact)**

4.3 AIR QUALITY

The following discussion is based upon an Air Quality and Greenhouse Gas Assessment prepared by Illingworth & Rodkin, Inc. in June 2019. A copy of this report is included in this Initial Study as Appendix A.

4.3.1 Environmental Setting

4.3.1.1 *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.

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 methane and other super-greenhouse gases (GHGs) that are potent climate pollutants in the near-term, and to decrease emissions of carbon dioxide by reducing fossil fuel combustion.³

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.

Local

Daly City General Plan

City of Daly City Relevant Air Quality Policies

Policies	Description
Policy RME-5:	Assess projected air emissions from new development and associated construction and demolition activities in conformance with the Bay Area Air Quality Management District (BAAQMD) CEQA Guidelines, and relative to state and federal standards.
Task RME-5.1	Amend the Planning Division's development review procedures to include a formal step that would help identify how a development project can incorporate design or functional changes that will minimize air quality impacts.
Task RME-5.3	Consider cumulative air quality impacts consistent with the region's Clean Air Plan and State law.
Task RME-5.4	Require the preparation of a Transportation Systems Management plan for new development that has been determined to contribute to a reduction in location air quality. Daly City 2030 General Plan Resource Management Element 193.
Task RME-5.5	Consult with BAAQMD to identify stationary and mobile TAC sources and determine the need for and requirements of a health risk assessment for proposed developments. type, size and operations of the facility.
Policy RME-6:	Assess projected air emissions from new development and associated construction and demolition activities in conformance with the Bay Area Air Quality Management District (BAAQMD) CEQA Guidelines, and relative to state and federal standards.
Task RME-6.1	For new, expanded, or modified development proposals (including tenant improvements) that are potential sources of objectionable smoke and odor, require an analysis of possible smoke and odor impacts and the provision of smoke and odor minimization and control

³ BAAQMD. *Final 2017 Clean Air Plan*. April 19, 2017. <http://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans>.

measures as mitigation. The requirements for such shall be codified within the Daly City Municipal Code.

Task RME-6.2 Require new residential development projects and projects categorized as sensitive receptors to be located an adequate distance from facilities that are existing and potential sources of odor. An adequate separate distance will be determined based upon the type, size and operations of the facility.

4.3.1.2 *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.⁴ 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
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.

⁴ 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.

Controlling the emissions of these precursor pollutants is the focus of the Bay Area's attempts to 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 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).⁵ 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.

4.3.1.3 *Existing Conditions*

Air quality and the amount of a given pollutant in the atmosphere are determined by the amount of a pollutant released and the atmosphere's ability to transport and dilute the pollutant. The major determinants of transport and dilution are wind, atmospheric stability, terrain and for photochemical pollutants, sunshine.

⁵ California Air Resources Board. "Overview: Diesel Exhaust and Health." Accessed June 16, 2018. <https://www.arb.ca.gov/research/diesel/diesel-health.htm>.

The U.S. Environmental Protection Agency (EPA) and the California Air Resources Board (CARB) have established ambient air quality standards for what are commonly referred to as “criteria pollutants,” because they set the criteria for attainment of good air quality. Criteria pollutants include carbon monoxide, ozone, nitrogen dioxide, sulfur dioxide, and particulate matter (PM).

4.3.1.4 Climate and Topography

The project site is located in San Mateo County, which is part of the San Francisco Bay Area Air Basin. The project area’s proximity to both the Pacific Ocean and the San Francisco Bay has a moderating influence on its climate.

4.3.1.5 BAAQMD Guidelines

The BAAQMD is the regional agency tasked with managing air quality in the region. The BAAQMD is primarily responsible for assuring that the federal and state ambient air quality standards are maintained in the San Francisco Bay Area. Air quality standards are set by the federal government (the 1970 Clean Air Act and its subsequent amendments) and the state (California Clean Air Act and its subsequent amendments). Regional air quality management districts such as BAAQMD must prepare air quality plans specifying how state standards would be met. The BAAQMD’s most recently adopted Clean Air Plan is the 2010 Clean Air Plan (2010 CAP). The 2010 CAP provides an updated comprehensive plan to improve the Bay Area’s air quality and protect public health, taking into account future growth projections to 2035. The BAAQMD has published CEQA Air Quality Guidelines that are used in this assessment to evaluate air quality impacts of projects. The thresholds of significance for construction- and operation-related pollutant emissions are shown in Table 4.3-2.

Table 4.3-2: BAAQMD Air Quality Significance Thresholds			
Pollutant	Construction Thresholds	Operation Thresholds	
	Average Daily Emissions (pounds/day)	Annual Daily Emissions (pounds/year)	Annual Average Emissions (tons/year)
Criteria Air Pollutants			
ROG	54	54	10
NO _x	54	54	10
PM ₁₀	82	82	15
PM _{2.5}	54	54	10
CO	Not Applicable	9.0 ppm (8-hour avg.) or 20.0 ppm (1-hour avg.)	
Fugitive Dust	Construction Dust Ordinance or other Best Management Practices	Not Applicable	
Health Risks and Hazards for New Sources			
Excess Cancer Risk	10 per one million	10 per one million	
Chronic or Acute Hazard Index	1.0	1.0	

Table 4.3-2: BAAQMD Air Quality Significance Thresholds			
Pollutant	Construction Thresholds	Operation Thresholds	
	Average Daily Emissions (pounds/day)	Annual Daily Emissions (pounds/year)	Annual Average Emissions (tons/year)
Incremental Annual Average PM _{2.5}	0.3 µg/m ³	0.3 µg/m ³	
Health Risks and Hazards for Sensitive Receptors and Cumulative Thresholds for New Sources			
Excess Cancer Risk	100 per one million		
Chronic Hazard Index	10.0		
Annual Average PM _{2.5}	0.8 µg/m ³		
Greenhouse Gas Emissions			
GHG Annual Emissions	1,100 metric tons or 4.6 metric tons per capita		
Notes: ROG = reactive organic gases, NO _x = nitrogen oxides, PM ₁₀ = course particulate matter or particulates with an aerodynamic diameter of 10 micrometers (µm) or less, PM _{2.5} = fine particulate matter or particulates with an aerodynamic diameter of 2.5 (µm) or less, and GHG = greenhouse gas.			

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) Violate any air quality standard or result in a cumulatively considerable net increase in an existing or projected air quality violation?	<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 substantial emissions (such as odors or dust) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

The proposed project will not conflict with the latest Clean Air planning efforts since; (1) the project's operational emissions would be well below the BAAQMD thresholds of significance for air pollutants as discussed below in Impact AIR-2 and development of the project site would be considered urban infill. **(Less Than Significant Impact)**

Impact AIR-2: The project would not violate any air quality standard or result in a cumulatively considerable net increase in an existing or projected air quality violation. **(Less Than Significant Impact)**

The 2011 BAAQMD *CEQA Air Quality Guidelines* contain a screening table that lists the minimum unit count for multi-family dwelling unit projects, below which the project would not result in the generation of operational criteria air pollutants that exceed the threshold of significance. The project proposes 122 homes on the project site which does not exceed the screening threshold for operational criteria pollutants or construction criteria pollutants of 451 units and 240 units, respectively. **(Less Than Significant Impact)**

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

Construction emissions would occur as exhaust emissions from construction equipment, truck travel and worker traffic, and from fugitive dust emission associated with demolition and ground disturbance. These two types of emissions (fugitive dust and toxic air contaminants) are discussed below.

Construction Fugitive Dust

Construction activities, particularly 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 soil. Fugitive dust emissions would vary depending on the nature and magnitude of construction activity, soil conditions and properties, and local meteorological conditions. Large dust particles would settle near the source, while fine particles would be dispersed over greater distances from the construction site. Nearby residents could be adversely affected by dust generated during construction activities. The BAAQMD considers construction fugitive dust impacts to be less than significant if best management practices are employed to reduce these emissions.

Mitigation Measure: The project proposes to implement the following best management practices identified by the BAAQMD to reduce fugitive dust emissions impacts to a less than significant level:

MM AQ-3.1: The project shall implement the following standard BAAQMD dust control measures during all phases of construction on the project site:

- 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.
- A publicly visible sign shall be posted with the telephone number and person to contact at the City of Daly City regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Bay Area Air Quality Management Air District's phone number shall also be visible to ensure compliance with applicable regulations. **(Less Than Significant With Mitigation Incorporated)**

Construction Toxic Air Contaminants

Construction equipment and associated heavy-duty truck traffic generates diesel exhaust, which is a known TAC. These exhaust air pollutant emissions would not be considered to contribute substantially to existing or projected air quality violations. Construction exhaust emissions may still pose health risks for sensitive receptors such as surrounding residents. The primary community risk impact issues associated with construction emissions are cancer risk and exposure to PM_{2.5}. Diesel exhaust poses both a potential health and nuisance impact to nearby receptors.

A health risk assessment of the project construction activities was conducted that evaluated potential health effects to nearby sensitive receptors from construction emissions of DPM and PM_{2.5}. This assessment included dispersion modeling to predict the off-site and on-site concentrations resulting from project construction so that lifetime cancer risks and non-cancer health effects could be evaluated.

Results of the health risk assessment indicate that the incremental residential cancer risk at the maximally exposed individual (MEI) receptor would be 27.0 in one million for infant exposure, which would be greater than the BAAQMD significance threshold of 10 in one million for cancer risk. In addition, the daycare MEI, located in the northeast corner of the daycare area, would have

maximum excess cancer risks of 25.7 in one million, which would also be greater than the BAAQMD significance threshold. Figure 4.3-1 shows the locations of the off-site maximally exposed individual sensitive receptors and TAC exposures.

The maximum modeled annual PM_{2.5} concentration was 0.20 micrograms per meter (µg/m³). This PM_{2.5} concentration does not exceed the BAAQMD significance threshold of 0.3 µg/m³ and is considered a less than significant impact. The maximum computed hazard index (HI) is 0.03, which is much lower than the BAAQMD significance criterion of a HI greater than 1.0.



LOCATIONS OF OFF-SITE SENSITIVE RECEPTORS AND MAXIMUM TAC IMPACTS

FIGURE 4.3-1

Mitigation Measures: With the implementation of MM AQ-3.1 and AQ-3.2, residential cancer risks would be reduced to a less than significant level.

- **MM AQ-3.2:** All diesel-powered off-road equipment, larger than 25 horsepower, operating on the site for more than two days continuously shall, at a minimum, meet U.S. EPA particulate matter emissions standards for Tier 3 engines with CARB-certified Level 3 Diesel Particulate Filters or equivalent. The use of equipment meeting U.S. EPA Tier 4 standards for particulate matter would also meet this requirement. Alternatively, the use of equipment that includes electric or alternatively-fueled equipment (i.e., non-diesel) would meet this requirement.

Implementation of MM AQ-3.1 is considered to reduce exhaust emissions by five percent and fugitive dust emissions by over 50 percent. Implementation of MM AQ-3.2 would further reduce on-site diesel exhaust emissions by 89 percent, and accordingly would reduce the cancer risk to less than 3.1 in one million, and the mitigated infant cancer risk at the daycare MEI would be less than 3.0 in one million, well below the BAAQMD ten cases per million threshold. After implementation of these mitigation measures, the project would have a less than significant impact with respect to community risk caused by construction activities. **(Less Than Significant Impact With Mitigation Incorporated)**

Impact AIR-4: The project would not result in substantial emissions (such as odors or dust) adversely affecting a substantial number of people. **(Less Than Significant Impact)**

The project 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, they would be localized and not likely to adversely affect people off-site by resulting in confirmed odor complaints. Occupancy of the residential building would not generate odors that would result in complaints. There were no identified odor sources that would affect the project in terms of generating frequent odor complaints. **(Less Than Significant Impact)**

4.3.3 Non-CEQA Effects

Per *California Building Industry Association v. Bay Area Air Quality Management District*, 62 Cal. 4th 369 (*BIA v. BAAQMD*), effects of the environment on a project are not considered CEQA impacts. The following discussion is included for informational purposes only because the City of Daly City has policies that address existing air quality conditions affecting a proposed project.

The proposed project would locate new residences near several stationary sources of TAC emissions, (such as SR 1, Serramonte Boulevard, and Callan Boulevard). Proximity to busy surface streets is also associated with exposure to TACs or PM_{2.5}, predominantly from diesel exhaust emissions. The health risks associated with these TAC sources are discussed below.

The exposure level is determined by the modeled concentration; however, it has to be averaged over a representative exposure period. The averaging period is dependent on many factors, but mostly the type of sensitive receptor that would reside at a site. The health risk assessment for the project

conservatively assumed long-term residential exposures. BAAQMD has developed exposure assumptions for typical types of sensitive receptors, including nearly continuous exposures of 70 years for residences. The cancer risk calculations for 70-year residential exposures reflect the use of BAAQMD's most recent cancer risk calculation method that uses age sensitivity factors in calculating cancer risks. Age-sensitivity factors reflect the greater sensitivity of infants and small children to cancer causing TACs.

Permitted Stationary Sources Community Risk Impacts

Permitted stationary sources of air pollution near the project site were identified using the BAAQMD's Stationary Source Risk and Hazard Analysis Tool. Two stationary sources (Plant #13900 and #111517) were identified as a diesel-powered generator and gasoline dispensing facility. As shown in Table 4.3-3, the stationary sources within 1,000 feet of the project site were identified to have maximum reported risks or PM_{2.5} concentrations below the BAAQMD thresholds and therefore, considered a less than significant impact. Refer to Appendix A for details regarding the location of the nearby stationary sources and the screening level excess cancer risk to future residents on-site.

Table 4.3-3 Local Community Risks and Hazards from Local Roadways and Stationary Sources			
Source	Maximum Cancer Risk (per million)	PM _{2.5} Concentration (µg/m ³)	Non-Cancer Hazard Index
State Route 1	1.8	0.02	0.01
State Route 35	0.7	0.01	<0.01
Serramonte Boulevard	6.2	0.22	<0.03
Callan Boulevard	0.3	0.01	<0.03
Plant #13900	9.0	--	0.02
Triton Gas Station (Plant #111517)	0.2	--	<0.01
BAAQMD Single-source Threshold	10 in one million	0.3	0.1
Significant?	<i>No</i>	<i>No</i>	<i>No</i>
Cumulative Total	18.2	0.26	<0.11
BAAQMD Cumulative Source Threshold	100 in one million	0.8 µg/m³	10.0
Significant?	<i>No</i>	<i>No</i>	<i>No</i>

Local Roadway Community Risk Impacts

The BAAQMD provides Roadway Screening Analysis Tables that can be used to assess potential excess cancer risk and annual PM_{2.5} concentrations from surface streets for each Bay Area county. Serramonte Boulevard is the highest volume roadway within 1,000 feet of the project site. SR 1 is approximately 500 feet north of the project site and has an estimated cancer risk of 1.8 (below BAAQMD's ten cases per million threshold) and PM_{2.5} of 0.02 µg/m³ (below BAAQMD's threshold of 0.3 µg/m³). SR 35 is approximately 1,000 feet southwest of the site and produces a cancer risk of 0.7 cases per million and 0.01 µg/m³, which are both below the BAAQMD thresholds.

The Average Daily Trip (ADT) volume on Serramonte Boulevard and Callan Boulevard is estimated to be approximately 17,100 ADT and 12,370 ADT, respectively. The BAAQMD Roadway Screening Analysis Calculator for San Mateo County calculated Serramonte Boulevard as an east-west roadway

with the project site south of the roadway, and Callan Boulevard as a north-south roadway with the project site west of the roadway. The estimated cancer risk from Serramonte Boulevard at the project site would be 6.2 cases per million (below BAAQMD's ten cases per million threshold) and PM_{2.5} concentration would be 0.22 µg/m³, below the threshold of 0.3 µg/m³. The estimated cancer risk from Callan Boulevard at the project site would be 0.3 cases per million (well below BAAQMD's ten cases per million threshold) and PM_{2.5} concentration would be 0.01 µg/m³, below the threshold of 0.3 µg/m³.

4.4 BIOLOGICAL RESOURCES

The following discussion is based in part on an Arborist Survey prepared by Hortscience/Bartlett Consulting in July 2019. A copy of this report is included as Appendix B of this Initial Study.

4.4.1 Environmental Setting

The project site is located in a developed urban area of Daly City. The project site is comprised of two paved parking lots and contains numerous mature trees on-site and along the site perimeter.

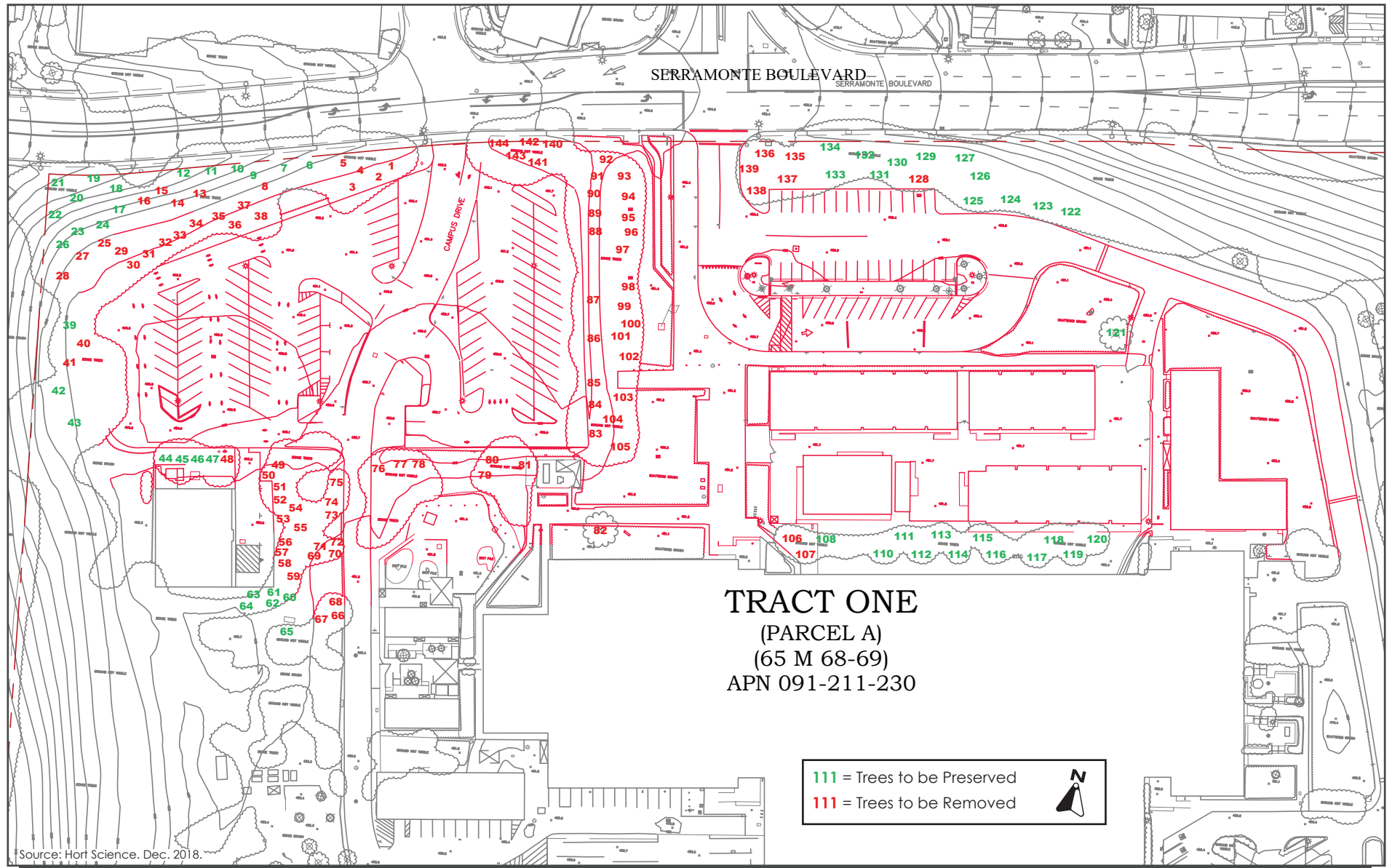
Habitats in developed urban areas are relatively low in species diversity. Species that use this habitat are urban adapted birds, such as Rock Dove, Mourning Dove, House Sparrow, Scrub Jay, and Starling. Based upon the developed habitats surrounding the site, no special-status plant or animal species are expected to be present.

Trees

The project site contains numerous mature trees on-site and along the site perimeter. In December 2018, a tree survey was completed for the project area and assessed 143 trees representing nine species. With the exception of two willows which are native to Daly City, all trees were planted as part of a landscape development.

Monterey pine was the most frequently occurring species with 82 trees. Pines formed a buffer planting between Serramonte Boulevard and the school campus and were also present along the west side of the site. Trees ranged from young to mature in development. Thirty-two trees were in poor condition while 24 trees were in fair condition. As a general observation, tree condition was related to trunk diameter; the smaller trees were in better condition than larger. Factors important in determining tree condition include trunk orientation (lean, bow, sweep), the presence of two or more stems, asymmetric or suppressed form, presence of pine pitch canker (*Fusarium circinatum*) and red turpentine beetle (*Dendroctonus valens*), and overall tree vigor.

Fifteen coast redwoods were located on the east side of the building in the southwest corner of the site, west of Campus Drive. Nine redwoods were in good condition and five were in excellent condition. A summary of the tree survey is included in Table 4.4-1. The tree locations that are indicated whether to remain or be removed are shown on Figure 4.4-1.



TREE ASSESSMENT PLAN

FIGURE 4.4-1

<p align="center">Table 4.4-1 Tree Survey Summary</p>							
Common Name	Scientific Name	Total # of Trees	Tree Condition*				
			Dead	Poor	Fair	Good	Excellent
Purple Bailey acacia	<i>Acacia baileyana</i> 'Purpurea'	2	--	--	--	1	1
Sydney golden wattle	<i>Acacia longifolia</i>	1	--	--	1	--	--
Monterey cypress	<i>Hesperocyparis macrocarpa</i>	38	--	21	16	--	1
Leptospermum	<i>Leptospermum laevigatum</i>	1	--	--	--	1	--
Pacific wax myrtle	<i>Myrica californica</i>	1	--	--	--	1	--
Monterey pine	<i>Pinus radiata</i>	82	2	32	24	16	8
Douglas-fir	<i>Pseudotsuga menziesii</i>	1	--	--	1	--	--
Willow	<i>Salix sp.</i>	2	--	--	2	--	--
Coast redwood	<i>Sequoia sempervirens</i>	15	--	--	1	9	5
Total		143	2	53	45	28	15
Notes: * Suitability of trees for preservation is based upon the age, health and structural condition, ability to safely coexist within a development environment, and invasiveness.							

4.4.1.1 Regulatory Framework

Federal Endangered Species Act and California Endangered Species Act

The federal Endangered Species Act and California Endangered Species Act protect listed wildlife species from harm or “take,” which can include habitat modification or degradation that directly results in death or injury to a listed wildlife species. The long-term purpose of these laws is to ultimately restore their numbers to where they are no longer threatened or endangered.

Federal Migratory Bird Treaty Act

The Federal Migratory Bird Treaty Act (FMBTA: 16 U.S.C., sec. 703, Supp. I, 1989) is part of a coordinated effort between the United States, Canada, Mexico, Japan, and Russia to help protect migratory birds in this part of the world. It prohibits killing, taking, selling, possessing, or trading in migratory birds, except in accordance with regulations prescribed by the Secretary of the Interior. This act encompasses whole birds, parts of birds, and bird nests and eggs.

State Fish and Game Code

Birds of prey, such as owls and hawks, are protected in California under provisions of the State Fish and Game Code, Section 3503.5 (1992), which states that it is “unlawful to take, possess, or destroy any birds in the order Falconiformes or Strigiformes (birds of prey) or to take, possess, or destroy the

nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto.” Construction disturbance during the breeding season could result in the incidental loss of fertile eggs or nestlings, or otherwise lead to nest abandonment. Disturbance that causes nest abandonment and/or loss of reproductive effort is considered “taking” by the California Department of Fish and Wildlife.

City of Daly City Municipal Code

Chapter 12.40 – Urban Forestry

This chapter provides regulations to optimize the use of trees and other landscaping within the city. This chapter requires plans submitted to the City for the construction, repair, or alteration of any building, housing, or structure to include provisions for sufficient guards or protectors to prevent injury to any existing publicly owned trees, shrubs, flowers, or vines. It also imposes conditions regarding the displacement of public trees, where a comparable size tree shall be planted or a fee is paid to the City to cover the cost of replacing a removed tree.

San Bruno Mountain Habitat Conservation Plan

The San Bruno Area Habitat Conservation Plan (HCP) was executed as an Agreement in November 1982 with the US Fish and Wildlife Service, California Department of Fish and Game, County of San Mateo, the cities of Brisbane, Daly City and South San Francisco, and several private property owners. The HCP was created to provide for the indefinite perpetuation of the Mission blue butterfly and to protect habitat of the other Species of Concern. It includes the establishment of public ownership of sufficient habitat area to support the species as well as funding for the ongoing maintenance of the habitat. Funding is provided by limited development that was excluded from such habitat area and devoted to urban uses, including, among others, residential, community service, commercial and recreational uses.

Given that the San Bruno Mountain encompasses approximately 3,600 acres, with various ownerships and within various cities, the HCP presents a single unifying and coordinating document to provide protection, enhancement and funding for the entire San Bruno Mountain ecological community. The HCP provides for the perpetuation of conserved habitat areas through eradication of exotic species; re-vegetation with grassland species; effective yearly monitoring of the species of concern to control reintroduction of exotics; and patrol of the area to discourage destructive human activities.

Portions of three of the four HCP planning areas are located within the jurisdiction of Daly City (Saddle, Radio Ridge, and Guadalupe Hills). Within those areas, all designated development has been completed including Point Pacific, Village in the Park, South Hills Estates, Linda Vista, and Bay Ridge. All of this development resulted in a net gain of available habitat either through dedication, easements, or on-site restoration. Furthermore, all of these projects continue to contribute to a trust fund that is used to maintain and monitor the habitat in perpetuity.

The project site is approximately 1.5 miles southwest of the San Bruno HCP boundary.

City of Daly City General Plan Policies

The General Plan includes policies for the purpose of avoiding or mitigating impacts resulting from planned development projects with the City. The following policies are specific to biological resources and are applicable to the proposed project.

City of Daly City Relevant Biological Resource Policies

Policies	Description
Policy LU-17:	Ensure that private development is responsible for providing any on- or off-site improvements related to and/or mitigating the impacts it causes.
Policy LU-18:	Development activities shall not be allowed to significantly disrupt the natural or urban environment and all reasonable measures shall be taken to identify and prevent or mitigate potentially significant effects.
Policy RME-16:	The City shall continue to recognize the importance of the San Bruno Mountain Habitat Conservation Plan (HCP), uphold the integrity of the concepts behind the plan, and respect the agreements that serve to implement it.

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 type="checkbox"/>	<input checked="" 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, impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
5) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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)**

The project site is located on a paved parking lot. No sensitive habitats or habitats suitable for special-status plants or wildlife species occur within or adjacent to the project site. The project would not directly result in impacts to special-status species.

The mature trees on and adjacent to the project site could provide 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.

Construction of the project during the breeding season could result in the incidental loss of fertile eggs or nestlings, or otherwise lead to nest abandonment. Disturbance that causes abandonment and/or loss of reproductive effort is considered a taking by the CDFW. Any loss of fertile eggs, nesting raptors, or any activities resulting in nest abandonment would constitute an impact.

Construction activities such as tree removal and site grading that disturb a nesting bird or raptor on-site or immediately adjacent to the construction zone would also constitute an impact.

Mitigation Measures: The project will be required to implement the following mitigation measures to reduce impacts to raptors and nesting birds to a less than significant level:

MM BIO – 1.1:

- Pre-construction nesting bird surveys shall be completed prior to tree removal if removal or construction is proposed to commence during the breeding season (February 1 to August 31) in order to avoid impacts to nesting birds. Surveys shall be completed by a qualified biologist no more than 14 days before construction begins. During this survey, the biologist or ornithologist shall inspect all trees and other possible nesting habitats in and within 250 feet of the project boundary.

- If an active nest is found in an area that would be disturbed by construction, the ornithologist shall designate an adequate buffer zone (~250 feet) to be established around the nest, in consultation with the California Department of Fish and Wildlife (CDFW). The buffer would ensure that nests shall not be disturbed until the young have fledged (left the nest), the nest is vacated, and there is no evidence of second nesting attempts.
- The applicant shall submit a report indicating the results of the survey and any designated buffer zones to the satisfaction of the Director of Community Development, prior to the removal of trees and issuance of a grading permit or demolition permit.

Conformance to State and federal law protecting nesting birds would reduce potential impacts to a less than significant level. **(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. **(No Impact)**

The project site is a paved parking lot and does not contain any riparian habitats or other sensitive natural communities. **(No Impact)**

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)**

The project site is a paved parking lot and devoid of wetlands, marshes, or vernal pools. The project would not impact any federally protected wetlands under the Clean Water Act. **(No Impact)**

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. **(No Impact)**

The project site is located in an urban area and does not support any watercourse, river, or provide substantial habitat that facilitates the movement of any native resident or migratory fish or wildlife species, other than birds which are discussed in Section 4.4.3(a) above. The project site is a paved parking lot and contains limited potential to serve as a migratory corridor for wildlife. **(No Impact)**

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 With Mitigation Incorporated)**

The project site contains numerous mature trees on-site and along the site perimeter. Of the total 143 trees assessed, approximately 90 trees would be removed based upon the most current plan set available as of June 2019, 88 of which are located on the property, and two of which are located outside of the project area.. The two Monterey pine trees that are outside the property line are numbered as #5 and #82 on Figure 4.4-1. Tree #5 is located along Serramonte Boulevard, and Tree #82 is located in the southeast corner of the project site. Because these trees are located on school district property, the removal of these trees is not regulated by the City of Daly City. **(Less Than Significant Impact)**

Construction activity, including grading, trenching, and equipment storage, could damage the remaining 53 trees intended to remain.

Mitigation Measures: The following mitigation measures would ensure that the remaining 53 trees would be preserved during construction of the project.

MM BIO-5.1:

Design Measures

- Verify the location and tag numbers of all trees. Include trunk locations and tag numbers on all plans.
- Allow the Consulting Arborist the opportunity to review project plans, including but not limited to, site, grading, drainage and landscape plans
- Design irrigation systems so that no trenching will occur within the TREE PROTECTION ZONE.

Pre-Construction Treatments

- Prepare a site work plan which identifies access and haul routes, construction trailer and storage areas, etc.
- Establish a TREE PROTECTION ZONE around each tree to be preserved. For design purposes, the radius of the TREE PROTECTION ZONE shall be two feet behind the proposed edge of grading. No grading, excavation, construction or storage of materials shall occur within that zone.
- Install protection around all trees to be preserved. Either stack and secure hay bales six feet high around tree trunks or employ a six-foot chain link with posts sunk into the ground. No entry is permitted into a tree protection zone without permission of the City's project manager.
- Trees to be removed shall be felled so as to fall away from the TREE PROTECTION ZONE and avoid pulling and breaking of roots of trees to remain. If roots are entwined, the

consultant shall require first severing the major woody root mass before extracting the trees, or grinding the stump below ground.

- Trees to be retained shall require pruning to provide clearance and/or correct defects in structure. All pruning is to be performed by an ISA Certified Arborist or Certified Tree Worker and shall adhere to the latest editions of the ANSI Z133 and A300 standards as well as the ISA Best Management Practices for Tree Pruning. Pruning contractor shall have the C25/D61 license specification.

Tree Protection Measures During Construction

- Prior to beginning work, the contractors working in the vicinity of trees to be preserved are required to meet with the Consulting Arborist at the site to review all work procedures, access routes, storage areas and tree protection measures.
- Any grading, construction, demolition or other work that is expected to encounter tree roots should be monitored by the Consulting Arborist.
- If injury should occur to any tree during construction, it should be evaluated as soon as possible by the Consulting Arborist so that appropriate treatments can be applied.
- Fences should be erected to protect trees to be preserved. Fences are to remain until all site work has been completed. Fences may not be relocated or removed without permission of the City's Project Manager.
- Any additional tree pruning needed for clearance during construction must be performed by a qualified arborist and not by construction personnel.
- All trees shall be irrigated on a schedule to be determined by the Consulting Arborist. Each irrigation shall wet the soil within the TREE PROTECTION ZONE to a depth of 30-inches.
- Any roots damaged during grading or construction shall be exposed to sound

With the implementation of the above mitigation measures, 53 trees would be preserved and protected during construction, and the impact would be less than significant. **(Less Than Significant Impact With Mitigation Incorporated)**

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)
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The project site is approximately 1.5 miles southwest of the San Bruno HCP boundary. Therefore, the project would not conflict with the provisions of an adopted HCP. **(No Impact)**

4.5 CULTURAL RESOURCES

4.5.1 Environmental Setting

Cultural resources are evidence of past human occupation and activity and include both historical and archaeological resources. These resources may be located above ground or underground and have significance in the history, prehistory, architecture, or culture of the nation, State of California, or local or tribal communities.

The City of Daly City is located in the northwest corner of San Mateo County. The City is urbanized with a variety of residential, commercial, and institutional land uses and has varying topography ranging from relatively flat in the northwest to steep hills in the south, northeast, and along the coast.

The project site is comprised of two paved parking lots in an urban region of the city. The project site is not considered an historic resource under CEQA Guidelines Section 15064(c), nor are any properties in the vicinity listed in the National Register of Historic Places or California Register of Historic Resources. There are no archaeological sites that have been recorded on or immediately adjacent to the project site.

4.5.1.1 *Regulatory Framework*

National Register of Historic Places

The National Register of Historic Places (National Register or NRHP) is the nation's most comprehensive list of historic resources and includes historic resources significant in American history, architecture, archeology, engineering and culture, at the local, state, and national level. National Register Bulletin Number 15, *How to Apply the National Register Criteria for Evaluation*, describes the Criteria for Evaluation as being composed of two factors. First, the property must be "associated with an important historic context" and second, the property must retain integrity of those features necessary to convey its significance.

The National Register identifies four possible context types or criteria, at least one of which must be applicable at the national, state, or local level. As listed under Section 8, "Statement of Significance," of the National Register Registration Form, these are:

- A. Property is associated with events that have made a significant contribution to the broad patterns of our history.
- B. Property is associated with the lives of persons significant in our past.
- C. Property embodies the 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 and distinguishable entity whose components lack individual distinction.
- D. Property has yielded, or is likely to yield, information important to prehistory or history.

Second, for a property to qualify under the National Register's Criteria for Evaluation, it must also retain historic integrity of those features necessary to convey its significance. While a property's significance relates to its role within a specific historic context, its integrity refers to a property's physical features and how they relate to its significance. To determine if a property retains the

physical characteristics corresponding to its historic context, the National Register has identified seven aspects of integrity:

1. Location – the place where the historic property was constructed or the place where the historic event occurred;
2. Design – the combination of elements that create the form, plan, space, structure, and style of a property;
3. Setting – the physical environment of a historic property;
4. Materials – the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property;
5. Workmanship – the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory;
6. Feeling – a property’s expression of the aesthetic or historic sense of a particular period of time; and
7. Association – the direct link between an important historic event or person and a historic property.

California Register of Historic Resources (CRHR)

The CRHR establishes a list of properties that are to be protected from substantial adverse change (PRC Section 5024.1). The California Office of Historic Preservation’s Technical Assistance Series #6, *California Register and National Register: A Comparison*, outlines the differences between the federal and state processes. The context types to be used when establishing the significance of a property for listing on the California Register are very similar, with emphasis on local and state significance. They are:

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States;
2. It is associated with the lives of persons important to local, California, or national history;
3. It embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values; or
4. It has yielded, or is likely to yield, information important to prehistory or history of the local area, California, or the nation.

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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2) Cause a substantial adverse change in the significance of an archaeological resource as pursuant to CEQA Guidelines Section 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
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. **(No Impact)**

The project site is a paved parking lot. There are no historic structures (i.e. CRHR or Daly City listed structures or sites) present on or adjacent to the project site. **(No Impact)**

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)**

Based on the identification of archaeological resources in the City of Daly City according to the NWIC, there are no known archaeological resources within the boundaries of the project site. Project-related grading and excavation during construction could result in significant impacts, if any unknown culturally significant sites are discovered. If archaeological remains were unearthed during project construction, damage to or destruction of significant archaeological remains would be a potentially significant impact.

Mitigation Measures

- **MM CUL-2.1: *Undiscovered Archaeological Resources.*** 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 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.
- **MM CUL-2.2: *Report of Archaeological Resources.*** If archaeological resources are identified, a final report summarizing the discovery of cultural materials shall be submitted to the City’s Planning Manager prior to issuance of certificate of occupancy. This report shall contain a

description of the mitigation program that was implemented and its results, including a description of the monitoring and testing program, a list of the resources found and conclusion, and a description of the disposition/curation of the resources. **(Less than Significant Impact With Mitigation Incorporated)**

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)**

Human remains have the potential to be discovered during construction. If human remains were unearthed during project construction, damage to or destruction of significant archaeological remains would be a potentially significant impact.

Mitigation Measures

- **MM CUL-3.1: *Human Remains*.** 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 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 Daly City 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 Daly City, before the resumption of ground-disturbing activities within 100 feet of where the remains were discovered. **(Less Than Significant Impact With Mitigation Incorporated)**

4.6 ENERGY

4.6.1 Environmental Setting

Energy usage is typically quantified using the British Thermal Unit (BTU). The BTU is the amount of energy that is required to raise the temperature of one gallon of water by one degree Fahrenheit. As points of reference, the approximate amount of energy contained in a gallon of gasoline, a cubic foot of natural gas, and a kilowatt hour (kWh) of electricity are 123,000 BTU, 1,000 BTU, and 3,400 BTU, respectively. Natural gas usage is expressed in terms of therms. A therm is equal to 100,000 BTU.

Electrical energy is expressed in units of kilowatts (kW = 1,000 watts),⁶ megawatts (MW = 1,000 kW), gigawatts (GW = one million kW), or terawatts hours (TW = one billion kW). One kilowatt hour (kWh) is equal to 1,000 watts supplied or consumed over the period of an hour. For example, running a 1,000-watt hand-held hair dryer for one hour consumes one kWh.

Total energy usage in California was approximately 7578 trillion BTUs in the year 2014 (the most recent year for which this specific data was available).⁷ The breakdown by sector was approximately 19 percent for residential uses, 19 percent for commercial uses, 24 percent for industrial uses, and 38 percent for transportation.⁸

The project site is currently a paved parking lot.

4.6.1.1 *Regulatory Framework*

Federal

At the federal level, energy standards set by the U.S. Environmental Protection Agency (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.

State

Renewables Portfolio Standard Program

In 2002, California established its Renewables Portfolio Standard (RPS) 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. In 2008, Executive Order 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

⁶ Under the International System of Units (SI), one kWh is equivalent to 3.6 megajoules, which is the amount of energy converted if work is done at an average rate of one thousand watts for one hour.

⁷ U.S. EIA. California Energy Consumption Estimates 2013. Accessed October 4, 2017.
<http://www.eia.gov/state/?sid=CA#tabs-2>.

⁸ U.S. EIA. California Energy Consumption by End-Use Sector, 2013. Accessed October 4, 2017.
http://www.eia.gov/beta/state/seds/data.cfm?incfile=/state/seds/sep_sum/html/sum_btu_1.html&sid=CA.

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.

Building Codes

The Energy Efficiency Standards for Residential and Nonresidential Buildings, as specified in Title 24, Part 6, of the California Code of Regulations (Title 24), was established in 1978 in response to a legislative mandate to reduce California's energy consumption. Title 24 is updated approximately every three years, and the 2016 Title 24 updates went into effect on January 1, 2017.⁹ Compliance with Title 24 is mandatory at the time new building permits are issued by city and county governments.¹⁰

The California Green Building Standards Code (CALGreen) establishes mandatory green building standards for buildings in California. CALGreen was developed to reduce GHG emissions from buildings, promote environmentally responsible and healthier places to live and work, reduce energy and water consumption, and respond to state environmental directives. The most recent update to CALGreen went in to effect on January 1, 2017, and covers five categories: planning and design, energy efficiency, water efficiency and conservation, material and resource efficiency, and indoor environmental quality.

City of Daly City General Plan

The City of Daly City's General Plan includes specific goals and policies to address energy conservation opportunities within the City. All new residential and nonresidential construction in the City must abide by the State of California's residential building standards for energy efficiency (Title 24 of the California Administrative Code). Title 24 Standards were established in 1978 to ensure that all new construction meets a minimum level of energy efficiency.

Policy	Description
Policy HE-23	Gradually increase energy and water efficiency standards for all new and existing housing while minimizing the costs of such standards.
Task HE-23.1	Develop enhanced residential energy efficiency standards (Title 24, California Administrative Code) in all new residential construction which exceeds State-mandated requirements by five percent in 2015, ten percent in 2020, and twenty percent in 2030.
Task HE-23.2	Establish energy and water efficiency upgrade programs that promote energy and water efficiency upgrades in all existing residential buildings. Energy efficiency upgrades promoted as part of this program could include upgrades such as attic insulation, programmable thermostats, heating duct insulation, and water heater insulation. Water efficiency upgrades could include the installation of low-flow shower heads, where feasible, and retrofit of existing toilets to meet low-flush requirements as established by the City. Examples of programs developed as a part of this task could provide financial incentives (e.g., rebates, appliance buy-back, and similar programs) aimed at providing strong incentives to residential building owners to use the programs.

⁹ California Building Standards Commission. "Welcome to the California Building Standards Commission". Accessed February 6, 2018. <http://www.bsc.ca.gov/>.

¹⁰ California Energy Commission (CEC). "2016 Building Energy Efficiency Standards". Accessed February 6, 2018. <http://www.energy.ca.gov/title24/2016standards/index.html>.

Policy HE-24	Mandate the inclusion of green building techniques into most new construction.
Policy HE-28	Promote alternative sources of energy in all homes.

Daly City's Green Vision

Daly City's Green Vision, A Climate Action Plan (CAP) for 2011-2020 and Beyond, was adopted in December 2010. Daly City's Green Vision guides the City towards a sustainable future that reduces GHG emissions from current levels, while promoting economic prosperity for present and future generation. The Green Vision identifies ten goals and seeks to achieve these goals through cost-effective strategies by the year 2020. The GHG reduction goals include adopting a general plan with measurable policies for sustainable development, reducing energy use in buildings, reducing transportation emissions, reducing solid waste disposal, and GHG emissions reductions from municipal operations. Daly City recently completed an update to the General Plan which incorporated these goals in March 2013.

Green Building Ordinance

Daly City's Green Vision seeks to reduce the City operation's overall carbon footprint through a series of ten goals by the year 2020. The goals cover topics such as reducing solid waste, recycling and reuse of wastewater, preservation of urban forests, adoption of a master pedestrian and bicycle plan, reuse of biosolids, the use of green building standards, and community education.

City of Daly City Municipal Code

Recycling and Diversion of Construction and Demolition, (Municipal Code 15.64): This ordinance requires that construction and demolition projects recycle or reuse 60 percent of the waste generated from the project. This ordinance is consistent with the requirements for construction and demolition debris diversion in CALGreen. Many of the construction materials, such as concrete, asphalt, asphalt singles, gypsum wallboard, wood and metals, can be reused or recycled, thus prolonging our supply of natural resources and potentially saving money in the process.

4.6.1.2 Existing Conditions

Electricity

Electricity in San Mateo County in 2016 was consumed primarily by the commercial sector (65 percent), with the residential sector consuming 35 percent. In 2016, a total of approximately 4,340 GWh of electricity was consumed in San Mateo County.¹¹

Peninsula Clean Energy (PCE) is a public and locally controlled electricity provider for the County of San Mateo. Electricity provided by PCE is delivered through PG&E transmission lines. Commercial and residential customers in San Mateo County are included in the PCE service area and can choose to have 50 to 100 percent of their electricity supplied from carbon free and renewable

¹¹ CEC. Energy Consumption Data Management System. "Electricity Consumption by County". Accessed January 19, 2018. <http://ecdms.energy.ca.gov/elecbycounty.aspx>.

sources. Customers are automatically enrolled in the ECOplus plan, which generates its electricity from 85 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.¹²

Natural Gas

PG&E provides natural gas services within the City of Daly City. In 2017, approximately 10 percent of California's natural gas supply came from in-state production, while 90 percent was imported from other western states and Canada.¹³ In 2016, residential and commercial customers in California used 29 percent, power plants used 32 percent, and the industrial sector used 37 percent. Transportation accounted for one percent of natural gas use in California. In 2017, San Mateo County used approximately 1.7 percent of the state's total consumption of natural gas.¹⁴

Fuel for Motor Vehicles

In 2017, 15 billion gallons of gasoline were sold in California.¹⁵ The average fuel economy for light-duty vehicles (autos, pickups, vans, and SUVs) in the United States has steadily increased from about 13.1 miles-per-gallon (mpg) in the mid-1970's to 22 mpg in 2016.¹⁶ 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 subsequently revised to apply to cars and light trucks Model Years 2011 through 2020.^{17,18} In 2012, the federal government raised the fuel economy standard to 54.5 miles per gallon for cars and light-duty trucks by Model Year 2025.¹⁹

¹² Sources: 1) Peninsula Clean Energy. "Frequently Asked Questions." Accessed June 11, 2018. <https://www.peninsulacleanenergy.com/resources/frequently-asked-questions/>. 2) Peninsula Clean Energy. "Energy Choices." Accessed June 11, 2018. <https://www.peninsulacleanenergy.com/our-power/energy-choices/>.

¹³ California Gas and Electric Utilities. 2017 California Gas Report. Accessed August 27, 2018. https://www.socalgas.com/regulatory/documents/cgr/2017_California_Gas_Report_Supplement_63017.pdf

¹⁴ CEC. "Natural Gas Consumption by County". Accessed February 21, 2019. <http://ecdms.energy.ca.gov/gasbycounty.aspx>.

¹⁵ California Department of Tax and Fee Administration. Net Taxable Gasoline Gallons. Accessed February 16, 2018. http://www.cdtfa.ca.gov/taxes-and-fees/MVF_10_Year_Report.pdf.

¹⁶ U.S. EPA. Table 4-23: Average Fuel Efficiency of U.S. Light Duty Vehicles. Accessed August 28, 2018. <https://www.bts.gov/content/average-fuel-efficiency-us-light-duty-vehicles>.

¹⁷ U.S. Department of Energy. Energy Independence & Security Act of 2007. Accessed February 8, 2018. <http://www.afdc.energy.gov/laws/eisa>.

¹⁸ Public Law 110-140—December 19, 2007. Energy Independence & Security Act of 2007. Accessed February 8, 2018. <http://www.gpo.gov/fdsys/pkg/PLAW-110publ140/pdf/PLAW-110publ140.pdf>.

¹⁹ National Highway Traffic Safety Administration. *Obama Administration Finalizes Historic 54.5 mpg Fuel Efficiency Standards*. August 28, 2012. Accessed February 8, 2018. <http://www.nhtsa.gov/About+NHTSA/Press+Releases/2012/Obama+Administration+Finalizes+Historic+54.5+mpg+Fuel+Efficiency+Standards>.

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, or wasteful use 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"/>

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

The project proposes to develop a 122-unit residential structure and a parking lot.

Energy would be consumed during both the construction and operational phases of the proposed project. Energy requirements throughout the construction phase include energy for the manufacturing and transportation of building materials, preparation of the site, and operation of construction equipment. The operation of the project would consume both electricity and natural gas for building heating and cooling, lighting, cooking, appliances, and water heating. Fuel would also be consumed during vehicle trips to and from the project site.

The proposed project is estimated to use approximately 0.6 GWh of electricity and 10 therms of natural gas per year. It is estimated that project-generated vehicle trips would use approximately 81,880 gallons of gasoline per year.²⁰ The project is required to comply with the City's Recycling and Diversion of Construction and Demolition Ordinance by recycling at least 60 percent of total waste during demolition or construction. In addition, the project proposes to be constructed in compliance with the 2016 California Green Building Standards Code (Title 24), which requires features that reduce water and energy consumption.

Given the infill location of the project site, the existing pedestrian, bicycle, and transit services in the project area, and the project's compliance with the City's Recycling and Diversion of Construction and Demolition Ordinance and 2016 California Green Building Code, the proposed project would not result in a wasteful, inefficient, and unnecessary consumption of energy. **(Less Than Significant Impact)**

²⁰ The project's estimated energy use was derived from the air quality and greenhouse gas emissions modeling completed for the project and included in Appendix A of this Initial Study.

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)**

According to the 2013 Integrated Energy Policy Report, in order to meet future energy demand, the state needs sufficient, reliable, and safe energy infrastructure. This includes:

- Improving energy efficiency in California’s existing buildings;
- Achieving 10-year energy efficiency targets;
- Inclusion of zero-net-energy buildings in state building standards;
- Overcoming challenges to increased use of geothermal heat and procurement of biomethane;
- Using demand response to meet California’s energy needs
- Integrating renewable technologies;
- Developing bioenergy; and
- Evaluating the need for and developing new electricity, natural gas, and transportation fuel infrastructure to maintain energy reliability and support clean energy policies.

The project would result in an increase in demand on existing energy resources; however, the project is required to comply with applicable regulations and City policies (including the Recycling and Diversion of Construction and Demolition Ordinance) that would conserve energy and water, and reduce fuel consumption and waste generation.

California’s overall electricity demand is anticipated to increase in the next decade, improvements in efficiency and production capabilities would help mitigate impacts resulting from increased demand. For example, the production of natural gas is anticipated to increase in the future due to recent technological advances and improvements in efficiency. In contrast, demand for natural gas is anticipated to decrease as more energy is generated from renewable sources and efficiency measures reduce the need for additional generation.²¹ Based on the above discussion, the existing energy supply and demand described above, and the project’s incremental demand, the proposed project is not anticipated to result in a substantial increase in demand on energy resources in relation to existing supplies. **(Less Than Significant Impact)**

²¹ California Energy Commission. *2013 Integrated Energy Policy Report*. 2013.

4.7 GEOLOGY AND SOILS

The following discussion is based in part on a Geotechnical Investigation prepared by Slate Geotechnical Consultants in June 2019. A copy of this report is included in Appendix C of this Initial Study.

4.6.3 Environmental Setting

4.6.3.1 *Regulatory Framework*

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act, signed into law December 1972, requires the delineation of zones along active faults in California. The Alquist-Priolo Act regulates development on or near active fault traces to reduce the hazard of fault rupture and to prohibit the location of most structures for human occupancy across these traces. Cities and counties must regulate certain development projects within the delineated zones, and regulations include withholding permits until geologic investigations demonstrate that development sites are not threatened by future surface displacement. Surface fault rupture, however, is not necessarily restricted to the area within an Alquist-Priolo Zone.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act of 1990 addresses non-surface fault rupture earthquake hazards, including liquefaction and seismically induced landslides, and its purpose is to protect public safety from the effects of strong ground shaking, liquefaction, landslides, other ground failure, and other hazards caused by earthquakes. The Act requires the State Geologist to delineate various seismic hazard zones and requires cities, counties, and other local permitting agencies to regulate certain development projects within these zones. Before a development permit is granted for a site within a seismic hazard zone, a geotechnical investigation of the site must be conducted and appropriate mitigation measures incorporated into the project design. Mapping of the San Francisco South Quadrangle in which Daly City is located is currently in progress by the California Department of Conservation under its Seismic Hazards Zonation Program.

2016 California Building Code

The State of California provides minimum standards for structural design and site development through the California Building Code [CBC – California Code of Regulations (CCR), Title 24, part 2]. Local codes are permitted to be more stringent than Title 24 but, at minimum, are required to meet all state standards and enforce the regulations of the 2016 CBC. The City's enforcement of its Building Code ensures the project would be consistent with the CBC.

Chapter 16 of the CBC deals with structural design requirements governing seismically resistant construction. Chapter 18 of the CBC includes the requirements for foundation and soil investigations; excavation, grading, and fill; allowable load-bearing values of soils; and design of foundation walls, retaining walls, embedded post and poles. Chapter 33 of the CBC includes requirements for safeguards at work sites to ensure stable excavations and cut or fill slopes and the

protection of pedestrians and adjoining properties from damage caused by such work. Appendix J of the CBC includes grading requirements for design of excavation of fills and for erosion control.

City of Daly City General Plan

The Seismic Safety Element, as well as the Safety Element of the City’s General Plan contains policies, recommendations, and actions to avoid or mitigate geology and soils impacts resulting from development within the City. All future development allowed by the project would be subject to conformance with applicable General Plan policies, including those listed below.

Policy	Description
Policy SE-1.1	Continue to investigate the potential for seismic and geologic hazards as part of the development review process and maintain this information for the public record. Update Safety Element maps as appropriate.
Policy SE-1.2	Require site specific geotechnical, soils, and foundation reports for development proposed on sites identified in the Safety Element and its Geologic and Hazard Maps as having moderate or high potential for ground failure.
Policy SE-1.3	Permit development in areas of potential geologic hazards only where it can be demonstrated that the project will not be endangered by, nor contribute to, the hazardous condition on the site or on adjacent properties. All proposed development is subject to the City's Zoning Ordinance and Building Codes.
Policy SE-1.4	Prohibit development—including any land alteration, grading for roads and structural development—in areas of slope instability or other geologic concerns unless mitigation measures are taken to limit potential damage to levels of acceptable risk.
Policy SE-1.5	Design and improve all critical care facilities and services to remain functional following the maximum credible earthquake. Avoid placement of critical facilities and high-occupancy structures in areas prone to violent ground shaking or ground failure.
Policy SE-1.6	Work with San Mateo County, California Water Service Company, and the San Francisco Water Department to ensure that all water tanks and San Francisco’s main water pipeline are capable of withstanding high seismic stress.
Policy SE-6.1	Regulate building construction practices to prevent hazardous structures and assure structural safety. Measures may include requiring conformance to an accepted set of construction standards, authorizing inspection of suspected dangerous structures, discontinuing improper construction activities, and eliminating hazardous conditions.

4.6.3.2 *Existing Conditions*

The project site and the surrounding parts of Daly City lie in the San Francisco Peninsula which is set within the Coast Ranges Geomorphic Province. The San Francisco Peninsula lies north of the Santa Cruz Mountains where it is flanked by the Pacific Ocean and San Francisco Bay to the west and east, respectively. The Coast Ranges Geomorphic Province is typified by northwest-southeast trending mountain ranges that stretch from the Oregon border to the north to Point Conception to the south. In the San Francisco Bay area, most of the Coast Ranges are underlain by tectonically complex, Jurassic- to Cretaceous-age bedrock of the Franciscan Complex.

The topography in the immediate vicinity of the project site is typified by undulating hills. Ground surface elevations at the project site generally range from 480 to 485 feet above mean sea level (amsl), whereas the San Bruno Mountains to the northeast locally attain elevations in excess of 1,300 feet amsl. Much of the runoff in the Project vicinity flows east to Colma Creek, whose southeast-trending drainage eventually discharges to San Francisco Bay. Based on the geologic mapping conducted by the USGS, the project site is immediately underlain by clastic sediments of the Pliocene to Pleistocene age (i.e., 5 million to 10,000 years before present) Merced Formation, described as medium-grey to yellowish orange, friable to firm sand, silt, and clay with minor amounts of gravel, lignite, and volcanic ash.

On-Site Geologic Conditions

Soils

The project site contains engineered fill as thick as 140 feet due to prior mass grading on-site to create the campus circa 1966. According to a geotechnical investigation, the engineered fill material consist of locally-derived silty sand that was compacted to a relative compaction of at least 90 percent of the tested maximum dry density for the fill material. The project site is characterized has having Site Class D soils which are considered stiff soils.

Groundwater

Groundwater in the project area slopes gently to the northeast. Based on USGS 7.5-minute topographic maps, groundwater flow is estimated to be generally to the south and east towards the San Francisco Bay. Fluctuations in the level of subsurface water can occur due to variations in rainfall, temperature, and other factors.

Liquefaction

Liquefaction is the result of seismic activity and is characterized as the transformation of loose water-saturated soils from a solid state to a liquid state during ground shaking. On-site soils are found to have a very low potential for liquefaction. The liquefaction susceptibility map produced by the California Geological Survey for the San Francisco Bay Area indicates a very low liquefaction susceptibility level for the project site area.

Landslides

The potential for landsliding or downslope movement is dependent on slope geometry, subsurface soil and groundwater conditions, past slope performance, and the level of ground shaking. According to the General Plan EIR, there is a low potential for landslide risk on the project site. The ground surface on-site is generally level with a well-compacted engineered fill downslope constructed to the east of the site. There is no reported history or evidence of slope instability, nor landslides, mapped at or in the immediate vicinity of the project site. The site is not located in a Seismic Hazard Zone for landsliding.²²

²² Telesis Engineers. *Preliminary Assessment of Earthquake-Related Geotechnical/Geologic Hazards for Jefferson Union High School*. August 2018.

Lateral Spreading

Lateral spreading is a type of ground failure related to liquefaction. It consists of the horizontal displacement of flat-lying alluvial material toward an open face, such as the steep bank of a stream channel. Considering the absence of a free face on or adjacent to the site, as well as the depth and relative thickness of the potentially liquefiable layers, the risk of lateral spreading on the site is low.

4.6.4 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 checked="" type="checkbox"/>	<input 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 will 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 Section 1803.5.3 of the California Building Code (2016), 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 checked="" type="checkbox"/>	<input 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)**

Seismic Shaking and Liquefaction

An earthquake of moderate to high magnitude generated within the San Francisco Bay Region could cause considerable ground shaking at the site. Therefore, the project would conform to the standard engineering and building practices and techniques specified in the CBC. The proposed buildings, streets, and utilities would be designed and constructed in accordance with the recommendations of a geotechnical report prepared for the site (refer to Appendix C), which identifies the specific design features related to geologic and seismic conditions.

According to the geotechnical report, existing on-site conditions indicate that there is very low potential for liquefaction to occur due to the presence of stiff soils. The building would meet the requirements of appropriate Building and Fire Codes, as adopted by the City of Daly City. The project, in conformance to applicable regulations and with the implementation of the recommendations in the geotechnical report, would not result in significant impacts from seismicity and seismic-related hazards including ground shaking and liquefaction. **(Less Than Significant Impact)**

Landslides

The ground surface on-site is generally level with a well-compacted engineered fill downslope constructed to the east of the site. There is no reported history or evidence of slope instability, nor landslides, mapped at or in the immediate vicinity of the project site. Therefore, hazards from landslides on-site would be considered less than significant. **(Less Than Significant Impact)**

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

The project site is generally flat. According to the geotechnical investigation, there is no reported history or evidence of slope instability, nor landslides, mapped at or in the immediate vicinity of the site, nor reports of ground failure at the site or in its immediate vicinity during historical earthquakes.

In addition, during construction, the City requires project applicants to submit a stormwater management plan that illustrates full compliance with the Municipal Regional Stormwater NPDES Permit (MRP). This will require the project to include stormwater controls, including site design measures, source controls, treatment measures, low impact development, hydromodification management, and construction best management practices to limit erosion. The City also requires that the project shall comply with the Statewide NPDES General Permit. These measures would help

to control erosion and are discussed further in *Section 4.9 Hydrology and Water Quality*. **(Less Than Significant Impact)**

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)**

Please see discussion of Impact GEO-2, above. **(Less Than Significant Impact)**

Impact GEO-4: The project would not be located on expansive soil, as defined in Section 1803.5.3 of the California Building Code (2016), creating substantial direct or indirect risks to life or property. **(Less Than Significant Impact)**

Please see discussion of Impact GEO-2, above. **(Less Than Significant Impact)**

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

The project would connect to the City's sewage system and would not be connected to a septic tank. **(No Impact)**

Impact GEO-6: The project, with mitigation measures, would not directly or indirectly destroy a unique paleontological resource or site or unique geological feature. **(Less Than Significant Impact With Mitigation Incorporated)**

Paleontological resources are the fossilized remains and/or traces of prehistoric plant and animal life exclusive of human remains or artifacts. Fossil remains, such as bones, teeth, shells, and wood, are found in geologic deposits (rock formations). Because the proposed project would not excavate into bedrock, and the site is underlain by artificial fill from past significant grading of the hillside when the campus was developed, the likelihood of discovery of significant fossils is very low. The following mitigation measure would ensure that the proper precautions are taken during an inadvertent paleontological discovery.

Mitigation Measure:

- **MM GEO-6.1:** *Unique Paleontological and/or Geologic Features and Reporting.* Should a unique paleontological resource or site or unique geological feature be identified at the project site during any phase of construction, all ground disturbing activities within 25 feet shall cease and the City's Planning Director notified immediately. A qualified paleontologist shall evaluate the find and prescribe mitigation measures to reduce impacts to a less than significant level. Work may

proceed on other parts of the project site while mitigation for paleontological resources or geologic features is implemented. Upon completion of the paleontological assessment, a report shall be submitted to the City and, if paleontological materials are recovered, a paleontological repository, such as the University of California Museum of Paleontology.

4.7 GREENHOUSE GAS EMISSIONS

The following discussion is based in part on a greenhouse gas emissions assessment completed for the project by Illingworth & Rodkin, Inc. in June 2019. A copy of this assessment is included in Appendix A of this Initial Study.

4.7.1 Environmental Setting

4.7.1.1 *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 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.

4.7.1.2 *Regulatory Framework*

State

Assembly 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.

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 2040. Plan Bay Area 2040 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). The project site is not located within a PDA.²³

Regional and Local

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

²³ Association of Bay Area Governments and Metropolitan Transportation Commission. "Project Mapper." <http://projectmapper.planbayarea.org/>.

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.

BAAQMD Significance Thresholds

The BAAQMD's CEQA Air Quality Guidelines do not use quantified thresholds for projects that are in a jurisdiction with a qualified GHG reductions plan (i.e., a Climate Action Plan). The plan has to address emissions associated with the period that the project would operate (e.g., beyond year 2020). For quantified emissions, the guidelines recommended a GHG threshold of 1,100 metric tons or 4.6 metric tons (MT) per capita. These thresholds were developed based on meeting the 2020 GHG targets set in the scoping plan that addressed AB 32. Development of the project would occur beyond 2020, so a threshold that addresses a future target is appropriate. Although BAAQMD has not published a quantified threshold for 2030 yet, this Initial Study utilizes an efficiency metric of 2.8 MT CO₂e/year/service population and a bright-line threshold of 660 MT CO₂e/year based on the GHG reduction goals of EO B-30-15. The service population metric of 2.8 is calculated for 2030 based on the 1990 inventory and the projected 2030 statewide population and employment levels. The 2030 bright-line threshold is a 40 percent reduction of the 2020 1,100 MT CO₂e/year threshold.

Daly City General Plan

The Housing Element of the City's General Plan contains policies, recommendations, and actions to promote energy conservation. Through energy conservation, GHG emissions are reduced. All future development allowed by the project would be subject to conformance with applicable General Plan policies, including the policy listed below.

Policy	Description
Policy HE-23	Gradually increase energy and water efficiency standards for all new and existing housing while minimizing the costs of such standards.
Policy HE-24	Mandate the inclusion of green building techniques into most new construction.
Policy HE-28	Promote alternative sources of energy in all homes.

Daly City's Green Vision

Daly City's Green Vision, A Climate Action Plan (CAP) for 2011-2020 and Beyond, was adopted in December 2010. Daly City's Green Vision guides the City towards a sustainable future that reduces GHG emissions from current levels, while promoting economic prosperity for present and future generations. The Green Vision identifies ten goals and seeks to achieve these goals through cost-effective strategies by the year 2020. The GHG reduction goals include adopting a general plan with measurable policies for sustainable development, reducing energy use in buildings, reducing transportation emissions, reducing solid waste disposal, and GHG emissions reductions from municipal operations. Daly City recently completed an update to the General Plan which incorporated these goals in March 2013.

Daly City's Ordinances

The following ordinances consistent with the goals of Daly City's Green Vision were adopted by the City Council in order to protect the environment and health of the community:

Green Building Standards Code (Municipal Code 15.22): The purpose of the ordinance is to adopt and incorporate the California Green Building Standards Code, 2013 edition, for the protection of the public health and safety of its inhabitants.

Recycling and Diversion of Construction and Demolition (Municipal Code 15.64): This ordinance requires that construction and demolition projects recycle or reuse 60 percent of the waste generated from the project. This ordinance is consistent with the requirements for construction and demolition debris diversion in CALGreen. Many of the construction materials, such as concrete, asphalt, asphalt singles, gypsum wallboard, wood and metals, can be reused or recycled, thus prolonging our supply of natural resources and potentially saving money in the process.

4.7.1.3 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 weather patterns. The project site is currently two paved parking lots associated with the District campus and generates GHG emissions through vehicles traveling to and from the site and parking lot lighting.

4.7.2 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 type="checkbox"/>	<input checked="" 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"/>
<hr/>				
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)			

As recommended by the BAAQMD, the CalEEMod model was used to predict GHG emissions from project construction and operation. Details regarding the model and assumptions are included in Appendix A of this Initial Study.

Construction Emissions

GHG emissions associated with project construction activities (including operation of construction equipment, hauling truck trips, vendor truck trips, and worker trips) were estimated to be 590 MT of carbon dioxide equivalents (CO_{2e}) annually. The BAAQMD does not have an adopted threshold of significance for construction-related GHG emissions, though total construction period emissions would not exceed the BAAQMD operational threshold of 660 MT CO_{2e} per year for 2030. The BAAQMD recommends quantifying emissions and disclosing that GHG emissions would occur during construction.

The BAAQMD also encourages the incorporation of best management practices, including recycling and reusing construction waste or demolition materials, and using local building materials of at least 10 percent. The project, in compliance with the City's Recycling and Diversion of Construction and Demolition Debris Ordinance, would recycle at least 60 percent of construction waste or demolition materials. **(Less Than Significant Impact)**

Operational Emissions

Project operation would generate GHGs primarily through electricity generation/use and generation of vehicle trips. At full buildout and occupancy, operational GHG emissions from the project are estimated to be 790 MT of CO_{2e} for 2022 and 665 MT of CO_{2e} for 2030, which exceeds the 2030 BAAQMD threshold of 660 MT/year of CO_{2e}. Land use projects with emissions above the 660 MT/year threshold are then subject to the GHG efficiency threshold of 2.8 MT per year per capita (MT/year/capita) to determine impact significance.

Table 4.7-1 Annual Project GHG Emissions (CO_{2e}) in Metric Tons			
Source Category	Existing in 2022	Proposed Project in 2022	Proposed Project in 2030
Area	<1	6	6
Energy Consumption	45	137	137
Mobile	71	728	603
Solid Waste Generation	5	28	28
Water Usage	1	13	13
Total	122	912	787
Net New Emissions		790	665
Significance Threshold		660 MT CO_{2e}	660 MT CO_{2e}
Service Population Emissions (MT/CO _{2e} /year/service population)			
Significance Threshold		2.8	2.8
Significant (Exceeds both thresholds)?		No	No

The service population assumed for the GHG analysis was 411 future occupants per the 2019 Department of Finance Data. The service population emissions for the year 2022 and 2030 would be 2.2 and 1.9 MT CO_{2e} /year/capita, respectively, which would not exceed the efficiency metric of 2.8 MT CO_{2e}/year/capita. **(Less than Significant Impact)**

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)**

The project would be consistent with the City's General Plan policies [specifically Policy HE-23 of increasing energy efficiency standards in new and existing housing developments], Green Vision, and Green Building Ordinance because the project proposes to be constructed in compliance with the current California Green Building Standards Code (Title 24), which requires efficient windows, insulation, lighting, ventilation systems, and other features that reduce water and energy consumption. The proposed project also has a low number of vehicle miles traveled (VMT) since many of the future residents would be District employees and would have a short commute or have no commute to work.

The project would comply with the requirements of the Green Building Ordinance and the Title 24 Building Code, which requires proposed buildings to be constructed with various measures that would reduce GHG emissions from the project. For this reason, the project would be consistent with the City's General Plan, Green Vision, and Green Building Ordinance. **(Less Than Significant Impact)**

4.8 HAZARDS AND HAZARDOUS MATERIALS

The following discussion is based on a Phase I Environmental Site Assessment prepared by Strata Environmental in May 2018. A copy of this report is included as Appendix D of this Initial Study.

4.8.1 Environmental Setting

Hazardous materials encompass a wide range of substances, some of which are naturally-occurring and some of which are man-made. Examples include motor oil and fuel, metals (e.g., lead, mercury, arsenic), asbestos, pesticides, herbicides, and chemical compounds used in manufacturing and other activities. A substance may be considered hazardous if, due to its chemical and/or physical properties, it poses a substantial hazard when it is improperly treated, stored, transported, disposed of, or released into the atmosphere in the event of an accident. Determining if such substances are present on or near project sites is important because exposure to hazardous materials above regulatory thresholds can result in adverse health effects on humans, as well as harm to plant and wildlife ecology.

4.8.1.1 *Regulatory Framework*

Federal and State

Hazardous Materials Overview

The storage, use, generation, transport, and disposal of hazardous materials and waste are highly regulated under federal and state laws. Federal regulations and policies related to development include the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as Superfund, and the Resource Conservation and Recovery Act (RCRA). 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. The California Department of Industrial Relations, Division of Occupational Safety and Health (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.

Cortese List

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), State

Water Resources Control Board (SWRCB), and San Mateo County. The project site is not on the Cortese List.²⁴

City of Daly City General Plan

The General Plan includes policies for the purpose of avoiding or mitigating impacts resulting from planned development projects within the City. The following policies are specific to hazards and hazardous materials and are applicable to the proposed project.

City of Daly City Relevant Hazardous Material Policies	
Policy	Description
Policy LU-18	Development activities shall not be allowed to significantly disrupt the natural or urban environment and all reasonable measures shall be taken to identify and prevent or mitigate potentially significant effects.
Task LU-18.1	Ensure that potentially significant environmental impacts associated with development proposals are properly mitigated through conditions of approval, mitigation measures, project design, or project denial. In cases where the impacts may not be completely preventable but will not significantly disrupt the community, the City may recognize that the benefits of a project may outweigh the environmental consequences. In no case shall the City approve a project that endangers the health, safety, or welfare of the public.
Policy SE-4.2	Cooperate with the County of San Mateo in the regulation of hazardous materials and transportation in the Fire Prevention Services Bureau within the City.
Policy SE-4.6	Require the preparation of a risk assessment to determine site suitability for applications for hazardous materials waste management facilities. Establish the distance requirements for these facilities from public assembly, residential or immobile population and recreation areas and structures. Access impacts from seismic, geologic, and flood hazards, impacts on wetlands, endangered species, air quality and emergency response capabilities; and proximity to major transport routes.

4.8.1.2 Existing Conditions

Historic Uses and Known Contamination

The project site was undeveloped prior to 1968 and was developed as a high school parking lot since 1969. Therefore, based on historical information, no known contamination has been recorded on the property.

Polychlorinated Biphenyls (PCBs) and Oil-Filled Equipment

Because of their nonflammable characteristics, polychlorinated biphenyls (PCBs) may be found in oil-filled electrical equipment such as transformers, capacitors, switches, compressors, and heat transfer equipment. U.S. EPA regulation 40 CFR, Part 761 identifies three categories for classifying electrical equipment: less than 50 ppm of PCBs, “Non-PCB”; between 50 and 500 ppm, “PCB-Contaminated”; and greater than 500 ppm, “PCB.” PCBs can also be found in hydraulic lift systems such as vehicle lifts, hoists, and elevators. Strata Environmental (Strata), the Phase I consultant,

²⁴ CalEPA. “Cortese List Data Resources”. Accessed October 22, 2018. <https://calepa.ca.gov/sitecleanup/corteselist>.

inspected the property for the presence of liquid-cooled electrical and hydraulic equipment, which could be potential sources of PCBs and/or petroleum impacts to the property.

Strata observed one pad-mounted transformer located on the south-eastern area of the project site, to the north of the adjacent JUHSD building, in a secured (fenced) area. The transformer is owned by Pacific Gas and Electric (PG&E). Strata could not observe any labeling regarding PCB content from outside the restricted area. Therefore, the oil-filled transformer must be assumed to be PCB-contaminated (range of contamination 50 to 499 ppm) according to U.S. EPA guidance.

However, because the transformer is owned by the utility (PG&E), any release of PCBs from the transformer would be the responsibility of the utility. Further, Strata did not observe evidence of any fires, spills, weeps, stains, or other indications of oil leakage, nor did the site contact report any such incidences associated with the transformer. Except for the pad-mounted transformer, Strata observed no other potential sources of PCBs on the property. Strata did not identify any outstanding issues regarding the potential impact of PCBs to the environmental condition of the project site.

4.8.1.3 *Off-Site Sources of Contamination*

According to the Phase I Environmental Site Assessment prepared for this project, the Exxon gas station (located to the east and downslope of the site) was identified as a small quantity generator of hazardous wastes generating between 100 kg and 1,000 kg of hazardous waste per month. The site had historical releases of hazardous materials that were under the authority of the San Francisco Bay Regional Water Quality Control Board (RWQCB) Region 2 and the San Mateo County Local Oversight Program (SMCLOP). The site was then granted case closure by the RWQCB and the SMCLOP in September of 2001. Based on the closed status of the LUST case and the cleanup activities completed, and the fact that this is not located on the Jefferson High School District campus and is down gradient, this site is not expected to represent a significant environmental concern.

The Jefferson Union High School District had one 550-gallon used oil UST installed in 1969 that was closed in 1979. There were no reported releases and therefore the site is not expected to represent an environmental concern.

4.8.1.4 *Other Hazards*

Airports

The San Francisco International Airport is located approximately 6.7 miles southeast of the project site. Federal Aviation Regulations, Part 77, “Objects Affecting Navigable Airspace” (referred to as FAR Part 77), requires 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 ground. For the project site, any structure exceeding 200 feet in height above ground would require submittal to the FAA for airspace safety review. The proposed project has a height ranging between 47 and 58 feet, therefore, notification to the FAA would not be required.

Any proposed land use policy actions, including the proposed General Plan amendment/rezoning,

that affect properties within the ALUCP Area B boundary in Daly City (such as the project site) must be referred to the C/CAG Board for an ALUCP consistency review and determination. The Plan would first go to the C/CAG Airport Land Use Committee for review and a recommendation to the C/CAG Board. The Board will consider the ALUC recommendation and evaluate the consistency of the General Plan amendment with the relevant airport/land use compatibility policies and criteria contained in the adopted ALUCP. The C/CAG Board consistency determination must occur before the Daly City City Council can approve the proposed project. If the C/CAG Board determines the project inconsistent, the City Council can override the Board's determination with a supermajority vote upon making necessary findings.

Wildland Fire Hazards

The project site is not located within a Very-High Fire Hazard Severity Zone for wildland fires.

4.8.2 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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, will it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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"/>

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
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 type="checkbox"/>	<input checked="" type="checkbox"/>

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

The proposed multi-family housing development would not involve the transport, use, storage or disposal of reportable quantities of hazardous materials. Residents would likely use and store small quantities of household hazardous wastes (i.e., ammonia, paints, oils) which would not be considered significant. During construction, the project may store fuels and chemicals used in the construction of the proposed buildings. **(Less Than Significant Impact)**

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)**

The project does not contain contaminated soil or groundwater and therefore would not create a significant hazard to the public through reasonably foreseeable upset. **(Less Than Significant Impact)**

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)**

The project proposes to construct a multi-family development on the Jefferson Union High School District campus, which contains an adult education school and a preschool. Residents on-site would likely use and store small quantities of household hazardous wastes (i.e., ammonia, paints, oils) which would not be considered significant. Therefore, the proposed residential uses would not use or emit significant quantities of hazardous materials that would have any effect on the Jefferson Union High School District campus. **(Less Than Significant Impact)**

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)**

The project is not located on a site which is included on a list of hazardous materials sites and, therefore, is not anticipated to have any impact on adjacent uses from existing conditions on the site. **(Less Than Significant Impact)**

Impact HAZ-5: 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)**

The project site is located within the Airport Influence Area (AIA) of the San Francisco International Airport (SFO). Federal Aviation Regulations, Part 77, “Objects Affecting Navigable Airspace” (referred to as 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 ground. For the project site, any proposed structure of a height greater than 200 feet above ground is required under FAR Part 77 to be submitted to the FAA for review.

The proposed project will be 48 feet in height to the top of the roof. The project site is approximately 480 to 485 feet above mean sea level (amsl). Therefore, the total height of the structure would not exceed 533 feet amsl, which falls under the FAR Part 77 height restrictions of 685 feet amsl, i.e. 200 feet above the site’s elevation of 485 feet amsl. **(Less Than Significant Impact)**

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)**

Compliance with the California Building and Fire Code requirements as amended by the City of Daly City will ensure that people in the new residential development is not exposed to health hazards or potential health hazards. The alignments of the drive aisles on-site and the radii of the corners and curbs are adequate to accommodate the circulation of emergency vehicles. **(Less Than Significant Impact)**

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. **(No Impact)**

The proposed project area is entirely urbanized and does not contain wildlands, nor is it adjacent to wildlands. Therefore, no discussion of wildland fires is included, and wildland hazards are not a concern.²⁵ **(No Impact)**

²⁵ City of Daly City. *General Plan Environmental Impact Report, Hazards and Hazardous Materials*. 2012.

4.9 HYDROLOGY AND WATER QUALITY

4.9.1 Environmental Setting

4.9.1.1 *Regulatory Framework*

Water Quality Overview

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 U.S. 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.

Federal

National Flood Insurance Program

The Federal Emergency Management Agency (FEMA) established the National Flood Insurance Program (NFIP) in order 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 (FIRM) that identify Special Flood Hazard Areas (SFHA). 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.

State

Statewide Construction General Permit

The SWRCB has implemented a 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) and Storm Water Pollution Prevention Plan (SWPPP) must be prepared by a qualified professional prior to commencement of construction. 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.

Regional

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 Stormwater Permit (MRP)

The San Francisco Bay RWQCB has issued a Municipal Regional Stormwater NPDES Permit²⁶ (MRP) to regulate stormwater discharges from municipalities and local agencies (co-permittees) in Alameda, Marin, San Francisco, Contra Costa, Napa, San Mateo, and Santa Clara Counties, and the cities of Fairfield, Suisun City, and Vallejo.

Provision C.3 – New Development and Redevelopment

Under Provision C.3 of the MRP, new and redevelopment projects that create or replace 10,000 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 all new 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 beneficial uses of local rivers, streams, and creeks. Projects may be deemed exempt from these requirements if they do not meet the size threshold, drain into tidally influenced areas or directly into the Bay, drain into hardened channels, or are infill projects in subwatersheds or catchment areas that are greater than or equal to 65 percent impervious.

4.9.1.2 *Existing Conditions*

Surface Water

The project site is located within the Colma Creek Watershed which extends from San Bruno Mountain to its outlet at the San Francisco Bay just north of the San Francisco Airport and south of Point San Bruno. The project site currently functions as a paved parking lot and contains several mature trees. The development location is tributary to a storm drain line in Serramonte Boulevard.

Groundwater

The aquifer that underlies most of Daly City is within the Westside Groundwater Basin (Westside Basin). The Westside Basin underlies parts of San Francisco and northern San Mateo counties. The

²⁶ MRP Number CAS612008

basin extends from Golden Gate Park in the north and past the San Francisco International Airport in the south. The basin extends to the west beneath the Pacific Ocean at least as far as the San Andreas Fault and to the east an unknown distance beneath San Francisco Bay. The Westside Basin is a buried valley, where the walls and floor of the valley are formed by rock with a mixture of coarse and fine-grained sediments as much as 3,700 feet thick in parts of the basin fill. The coarse-grained sediments consist of sand and gravel and the fine-grained sediments consist of silt and clay. Sand and gravel can transmit substantial quantities of water to wells, whereas silt and clay impede the movement of groundwater. Where silt and clay deposits form semi-continuous beds, they can effectively isolate the water table from underlying aquifer. Groundwater in the shallow water table aquifer is referred to as “unconfined” and the underlying aquifer separated from the water table by continuous and semi-continuous fine-grained silt and clay strata are referred to as “confined.” Both unconfined and confined conditions occur in the Westside Basin. The project site is not located within a natural or facility groundwater recharge area.²⁷

4.9.2.2 *Flooding*

The Federal Emergency Management Agency (FEMA) has developed a Flood Hazard Boundary Map (FHBM) and has designated Daly City as a Non-Special Flood Hazard Area (NSFHA). The project site is not located in a 100-year floodplain.

4.9.2.3 *Dam Inundation, Seiches, Tsunamis, and Mudflow Hazards*

No areas in the city are subject to dam inundation. There are no water bodies in Daly City so there is no threat of seiches. A tsunami inundation map prepared by the California Department of Conservation shows a portion of the coast in Daly City as a tsunami inundation area. However, the project site is outside of the tsunami inundation area.

4.9.2.4 *Water Quality*

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. Surface runoff from roads are collected by storm drains and discharged into Colma Creek. The runoff often contains contaminants such as oil and grease, plant and animal debris (e.g., leaves, dust, and animal feces), pesticides, litter, and heavy metals. In sufficient concentration, these pollutants have been found to adversely affect the aquatic habitats to which they drain.

Under existing conditions, the project site consists of a paved parking lot and driveway. The existing ground coverage is approximately 108,830 square-foot impervious surfaces (64.7 percent impervious) and 59,490 sf pervious surfaces (35.3 percent pervious). Site elevations vary from approximately elevation 495 feet to the west and 480 at the main parking lot near the entrance to the site. Stormwater onsite is collected in area drains or inlets and conveyed in below grade pipes to the

²⁷ City of Daly City. *General Plan Environmental Impact Report, Hydrology*. 2012.

storm drain outfall located in the existing parking lot near the main vehicular entrance. The outfall discharges to an existing 24-inch storm drain main in Serramonte Boulevard that flows to the east.

4.9.2 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 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 type="checkbox"/>	<input checked="" 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"/>

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)**

Construction

Potential negative impacts related to water quality are constrained by existing regulatory systems from the federal to the local level. The Clean Water Act sets minimum water quality standards for all surface waters in the U.S. and requires that industrial, municipal, and construction-related sources of pollution are regulated through the NPDES. The City requires project applicants to submit a stormwater management plan that illustrates full compliance with the Municipal Regional Stormwater NPDES Permit (MRP). This will require the project to include stormwater controls, including site design measures, source controls, treatment measures, low impact development, hydromodification management, and construction best management practices. The City also requires that the project shall comply with the Statewide NPDES General Permit. The SWMPPP Stormwater Management Plan provides programs that commit the City to attaining water quality standards, prevent disposal of hazardous materials, and minimize discharge of sediments into creeks. These policies are reinforced by the discharge prohibitions and requirements for reducing pollutants in storm water in Title 14 and Title 15 of the Municipal Code. Adherence to regulations, policies and standards will ensure that impacts to water quality will be less than significant. **(Less Than Significant Impact)**

Post-Construction Water Quality Impacts

The proposed ground coverage consists of approximately 120,300 square feet impervious surfaces (71.5 percent impervious) and 47,970 square feet pervious surfaces (28.5 percent pervious). The project will increase the amount of impervious surfaces from the existing condition and will require detention to control the peak flow leaving the site. Overall, the proposed condition will increase the site's impervious footprint by approximately 11,520 square feet. The proposed drainage system will consist of area drains, drop inlets, manholes, and stormwater treatment areas with overflow structure, and below grade pipes. The proposed project would have 13 drainage management areas with self-treating landscaping and bioretention zones to treat runoff. The drainage system will convey runoff to the existing outfall located near the main vehicular entrance. With the implementation of stormwater treatment measures, the project would result in less than significant impacts to water quality. **(Less Than Significant Impact)**

Table 4.9-1						
Pervious and Impervious Surfaces On-Site						
Site Surface	Existing/Pre-Construction (S.F.)	%	Project/Post-Construction (SF)	%	Difference (S.F.)	%
Impervious	108,830	64.7	120,300	71.5	+11,520	+6.8
Pervious	59,440	35.3	47,970	28.5	-11,520	-6.8
<i>Total</i>	168,270	100	168,270	100		

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

Daly City receives a large portion of its water supply from the San Francisco Public Utilities Commission (SFPUC) and supplements the SFPUC supply with groundwater pumped from six local wells. During dry periods, groundwater makes up a larger proportion (up to 45 percent) of the City's supply. The proposed project, consisting of 122 multi-family units, would not be expected to result in the need for excessive groundwater pumping from the local wells, and would therefore not substantially decrease groundwater supplies. (see water supply discussion in Section 4.18 Utilities and Service Systems)

There are no designated groundwater recharge areas within the Westside Groundwater Basin. The principal sources of recharge are direct infiltration of rainfall, infiltration of irrigation water, and leakage from water and sewer pipes.²⁸ As shown in Table 4.9-1, the proposed project would slightly reduce the overall perviousness of the site, resulting a corresponding decrease in infiltration capacity. However, the project's Stormwater Management Plan shows numerous self-retaining, self-treating, and bioretention areas within the landscaping that could provide opportunities for stormwater infiltration. The project would therefore not be expected to substantially interfere with groundwater recharge or impede groundwater management of the basin. (Less Than Significant 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)

There are no waterways on the project site and, therefore, redevelopment of the project site would not alter the course of a stream or river. Construction on the site will comply with the City's stormwater regulations to ensure construction activities on the site do not result in increased soil or exceed capacity of the drainage system, or add substantial sources of polluted runoff erosion or siltation off-site. (Less Than Significant Impact)

Impact HYD-4: The project would not risk release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones. (No Impact)

²⁸ *San Francisco Bay Hydrologic Region Westside Groundwater Basin*, California's Groundwater Bulletin 118, January 20, 2006.

The project site is not located in a 100-year floodplain and, therefore, would not place housing within a 100-year flood hazard area or impede or redirect flood flows within a 100-year flood hazard area. The project site, due to its topography, is not subject to seiche, tsunami, or mudslide hazards. **(No Impact)**

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)**

As previously described, the project site is located within the Westside Groundwater Basin. There are existing groundwater management plans for the northwestern portion (North Westside Groundwater Basin Management Plan) and the southern portion (South Westside Basin Groundwater Management Plan) of the Basin. Although the project site technically lies outside of the boundaries of these two management plans, it is within the City of Daly City, which would be the water service provider for the project and is a participant in the South Westside Basin Groundwater Management Plan. The City would implement the groundwater protection and management goals and objectives of the Plan. The project, which proposes to redevelop an existing parking lot into a multi-family housing development, would not conflict with or obstruct the implementation of the Plan. **(Less Than Significant Impact)**

4.10 LAND USE AND PLANNING

4.10.1 Environmental Setting

4.10.1.1 *Regulatory Framework*

Comprehensive Airport Land Use Compatibility Plan for the Environs of the San Francisco International Airport and Federal Aviation Regulations, Part 77

In 1967, the State legislature adopted legislation requiring the establishment of airport land use commissions in counties with one or more airports serving the general public. Amendments adopted by the legislature in 1970 required each commission to develop comprehensive airport land use compatibility plans (ALUCPs). The purpose of the ALUCPs is to provide for the orderly growth of airports and the surrounding areas to minimize the public's exposure to excessive noise and safety hazards.

The project site is located within the Airport Influence Area (AIA) of the San Francisco International Airport (SFO). Properties within the AIA may be subject to some of the annoyances or inconveniences associated with proximity to airport operations (e.g., noise, vibration, and odors). The airport/land use compatibility of a proposed development or land use policy action shall be determined by comparing the proposed development or land use policy action with the safety compatibility criteria, noise compatibility criteria, and airspace protection/height limitation criteria in the ALUCP.

Furthermore, properties located within the 70 dB CNEL aircraft noise contour for SFO warrant land use controls to promote noise compatibility. The project site is not located within SFO's 70 dB CNEL aircraft noise contour.

The ALUCP also includes airspace protection/height limitation criteria based on Federal Aviation Regulations. Federal Aviation Regulations, Part 77, "Objects Affecting Navigable Airspace" (referred to as 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 ground. For the project site, any proposed structure of a height greater than approximately 200 feet above mean ground level is required under FAR Part 77 to be submitted to the FAA for review.

Any proposed land use policy actions, including the proposed General Plan amendment/rezoning, that affect properties within the ALUCP Airport Influence Area B boundary in Daly City (such as the project site), must be referred to the C/CAG Board for an ALUCP consistency review and determination. The Plan would first go to the C/CAG Airport Land Use Committee for review and a recommendation to the C/CAG Board. On September 12, 2019, the Board considered the ALUC recommendation and evaluated the consistency of the project with the relevant airport/land use

compatibility policies and criteria contained in the adopted ALUCP. The C/CAG Board determined the proposed General Plan Amendment and Rezoning and related project entitlements were consistent with relevant ALUCP policies, with a required condition of approval related to real estate disclosure requirements regarding the site's location within the AIA.

City of Daly City General Plan

The project site is designated as *Commercial – Office* in the City's General Plan. The project proposes a General Plan Amendment to *Residential – High Density* to accommodate the proposed residential development. The Land Use Element of the City's General Plan contains policies, recommendations, and actions to avoid or mitigate land use impacts resulting from development within the City. All future development allowed by the project would be subject to conformance with applicable General Plan policies, including those listed below.

Policy	Description
Policy LU-10	Ensure that new single-family homes and duplexes complement the scale, character, and street relationship of existing homes of the neighborhood in which they are constructed.
Task HE-20.1	Amend the Zoning Ordinance non-conforming building regulations to allow the voluntary reconstruction, restoration, or rebuilding of any multi-family residential building with three or more units. Examples of non-conformity may include unit count, parking provision, and building setback and height. Such reconstruction, restoration, or rebuilding shall be limited for both single-family and multiple-family buildings in the ways described by California Government Code Section 65852.25.

City of Daly City Zoning Ordinance

The Zoning Ordinance is provided in Title 17 of the Daly City Municipal Code. The Zoning Ordinance helps promote public health, safety, morals, convenience, comfort, prosperity and general welfare of residents in the City.

The project site is zoned *Planned Development (PD-31)*. This district is designed to accommodate various types of development such as neighborhood and district shopping centers, professional and administrative areas, single-family and multiple-family residential development, commercial service centers and industrial parks or any other use of combination of uses which can appropriately be made a part of a planned development.²⁹ Currently, the PD-31 zoning district allows the construction of a 175 residential units and 200,000 s.f. of office space. The project proposes an amendment to the PD-31 zoning specific to the 122-unit development.

4.10.1.2 Existing Conditions

The project site is located in an urban area with residential uses to the north and west, and a variety of institutional, quasi-public, and commercial uses to the south and east. The project site is bounded by Serramonte Boulevard to the north, Callan Boulevard to the east, Campus Drive to the south and residential buildings on the west. The layout and design of the project does not include any features that would physically divide the community (e.g., impeding roadways or sidewalks).

²⁹ City of Daly City Municipal Code Chapter 17.28

The project site is currently a paved parking lot and includes a drive way off of Serramonte Boulevard and numerous mature trees. The site is located approximately 1.7 miles southwest of the San Bruno Habitat Conservation Plan boundary. The site is not used for agricultural or forestry uses.

4.10.2 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Impact LU-1: The project would not physically divide an established community. **(Less Than Significant Impact)**

The project site is located in a developed urban area with residential uses to the north and west, and a variety of institutional uses to the south and east. Implementation of the proposed project would result in the construction of 122 multi-family units on the site. The layout and design of the project does not include any features that would physically divide the community (e.g., impeding roadways or sidewalks). For these reasons, the project would not physical divide an established community. **(Less Than Significant Impact)**

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)**

The project site is located in the Serramonte Planning Area, which is the newest large-scale subdivision in Daly City. The project site is designated in the General Plan as *Commercial-Office*, which allows for office and locally-serving commercial uses. In order for the proposed multi-family development to comply with the General Plan, a General Plan Amendment is proposed to *Residential - High Density* which allows residential development of up to 50 dwellings units per acre.

Since the project is an affordable housing project, it would be consistent with the City's Inclusionary Housing Ordinance which was approved in December of 2018. According to the Ordinance, a lack of new affordable units will have a substantial negative impact on the environment because: (1) housing will have to built elsewhere, far from employment centers and therefore commutes will increase, causing increased traffic and transit demand and consequent noise and air pollution; and (2) City businesses will find it more difficult to attract and retain the workers they need. Affordable housing policies contribute to a healthy job and housing balance by providing more affordable housing close to employment centers.

Thus, since this project is proposed on the Jefferson Union High School District, it aligns with the goals of the City's Inclusionary Housing Ordinance in providing affordable housing to staff who work in the school district and can easily get to work. Based on the above discussion, the project would be consistent with the City's General Plan and Inclusionary Housing Ordinance. **(Less Than Significant Impact)**

4.11 MINERAL RESOURCES

4.11.1 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 will 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"/>

Impact MIN-1: The project would not result in the loss of availability of a known mineral resource that would be of value to the region and residents of the state. **(No Impact)**

The San Mateo County General Plan identifies 13 mineral resources found in San Mateo County and classifies these resources into four categories. Seven of these minerals: chromite, clay, expansible shale, mercury, sand and gravel, sands (specialty), and stone (dimension), are not likely to be used primarily because of limited quantities, urbanization or economic infeasibility.

Due to the fact that the project site is located on urban land in the City of Daly City, there are no significant mineral resources on or in the vicinity of the project site. **(No Impact)**

Impact MIN-2: The project would not result in the loss of availability of locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan. **(No Impact)**

Please see the discussion for MIN-1, above. **(No Impact)**

4.12 NOISE

4.12.1 Environmental Setting

4.12.1.1 *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.³⁰ 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.

4.12.1.2 *Regulatory Framework*

Federal

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 4.12-1 below. There are established criteria for frequent events (more

³⁰ 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} .

than 70 events of the same source per day), occasional events (30 to 70 vibration events of the same source per day), and infrequent events (less than 30 vibration events of the same source per day). These criteria can be applied to development projects in jurisdictions that lack vibration impact standards.

Table 4.12-1: 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.			

State

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 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.

Local

Comprehensive Airport Land Use Compatibility Plan for the Environs of the San Francisco International Airport

As discussed in more detail in Section 4.10 Land Use, the project site is located within the Airport Influence Area (AIA) of the San Francisco International Airport (SFO). Properties within the AIA may be subject to some of the annoyances or inconveniences associated with proximity to airport operations (e.g., noise, vibration, and odors). The airport/land use compatibility of a proposed development or land use policy action shall be determined by comparing the proposed development or land use policy action with the safety compatibility criteria, noise compatibility criteria, and airspace protection/height limitation criteria in the ALUCP. The site is located outside of the SFO 70 dB CNEL noise contour.

City of Daly City General Plan

The General Plan includes policies for the purpose of avoiding or mitigating impacts resulting from planned development projects with the City. The following policies are specific to noise and vibration and are applicable to the proposed project.

City of Daly City Relevant Noise and Vibration Policies

Policies	Description
Policy NE-3	Maintain a CNEL level of not more than 70 dBA L_{eq} in residential areas.
Task NE-3.1	Continue to enforce the environmental noise requirements of the State Building Code (Title 24).
Task NE-5.1	Additional noise studies should be conducted in “Conditionally Acceptable” noise environments to ensure adequate mitigation features are employed. Usually conventional construction with closed windows and fresh air supply systems will maintain a healthy noise environment.
Task NE-2.1	Use the Noise Control Guidelines to assess the suitability of a site for new development in combination with the noise contours to accurately identify areas that may need additional noise study and mitigation. Noise mitigations include additional insulation, double glazing of windows and increasing building setbacks from the noise source. Mitigations should also be creative and attractive whenever possible and appropriate. Creative noise mitigation measures can include incorporation of fountains using water to mask freeway noise and noise walls of an appropriate scale painted with decorative murals.
Task HE-4.2	For all development proposals with the 65dB CNEL noise contour, the City shall require a noise study that identifies the proposed project’s compliance with requirement of Task 4.1. If the project qualifies for review under the California Environmental Quality Act (CEQA), the City shall incorporate the noise study and any mitigation measures into the CEQA document and shall adopt findings that the project, as conditioned, complies with the interior noise level requirement.
Policy NE-1	Use the future noise contour map to identify existing and potential noise impact areas.
Task NE-9.1	Depending upon the hours of operation, intensity of use, and the location of sensitive receptors in the area, the expansion or change of use could cause noise impacts. Acoustical studies should be performed, at the applicant's expense, during the discretionary and environmental review processes and conditions should be placed on the project accordingly.
Task NE-11.3	Require all future development within the Airport Influence Area B boundary for San Francisco International Airport to conform to the relevant height/airspace protection, aircraft noise, and safety policies and land use compatibility criteria contained within the most recent adopted version of the comprehensive airport/land use compatibility plan (ALUCP) for the environs of San Francisco International Airport.

City of Daly City Municipal Code

Title 9 – Public Peace, Morals and Welfare

Chapter 9.22 of the Daly City Municipal Code contains language to protect residents from excessive noise exposure. Section 9.22.010 prohibits an individual from causing a disturbance such that it disturbs the public peace off-site. Section 9.22.020 states that no person shall maintain, operate, or conduct any loudspeaker or amplifier in such a manner as to cause the sound to be projected outside any building or out of doors in any part of the City without first obtaining a permit to do so. Section 9.22.030 deals more specifically with noise and states that between the hours of 10:00 p.m. and 6:00 a.m. no person shall cause, create, or permit any noise which may be heard beyond the confines of the property of origin. The Police Department enforces Chapter 9.22 of the Municipal Code.

Title 15 – Buildings and Construction

Section 15.00.130 requires any home, constructed after January 1, 1993 or renovated at a cost equal to twenty-five percent or more of the value of the home and located within the 65 CNEL (FAA approved) contour map that is illustrated on the Aircraft Noise Soundproofing Project Area Map, must be insulated to meet standards applied in noise insulation programs supported by the Federal Aviation Administration. The project site is not within the 65 CNEL noise contour.

Title 17 – Zoning

Title 17 of the Daly City Municipal Code provides for discretionary review of projects through the use permit and variance process. An application for development is analyzed in light of many concerns including comparing the proposed use against the noise contours and Noise Compatibility Guidelines. The Planning Division attaches conditions of project approval to reduce noise impacts to future occupants of the proposed development as well as conditioning times construction activities may occur in order to reduce noise impacts to surrounding land uses.

4.12.1.3 *Existing Conditions*

The project site is bounded by Serramonte Boulevard to the north, a variety of institutional, quasi-public, and commercial uses to the east and south, and residences to the west. The noise environment on the project site results primarily from vehicular traffic along Serramonte Boulevard and aircraft departures from the San Francisco International Airport (SFO). According to the General Plan EIR, the existing roadway noise ranges between 65 to 70 dBA. The project site is not within the 65 CNEL noise contour for SFO.

4.12.2 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2) Generation of excessive groundborne vibration or groundborne 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 With Mitigation Incorporated)**

Permanent Noise Impacts

The proposed project would add a total of approximately 893 total average daily trips on to surrounding roadways including Serramonte Boulevard and Callan Boulevard. This would not double the existing volumes of traffic on Serramonte Boulevard or Callan Boulevard and therefore would not result in a permanent increase in ambient noise levels in the vicinity of the project area. **(Less Than Significant Impact)**

Temporary Noise Impacts

The construction schedule assumes that the project would be built out over a period of approximately 13 months beginning in 2020. The project would be constructed in six different phases: paving demolition, site preparation, grading, building construction, paving, architectural coating. The demolition phase would take approximately 20 days. The site preparation phase would take approximately five days. The grading phase would take approximately eight days. The building construction phase would take approximately 230 days (eight months). The paving phase would take approximately 18 days. The architectural coating phase would take approximately 18 days. The project does not include construction activities that would generate substantial loud noise such as building demolition, excessive grading or soil removal, and pile driving.

Project implementation would result in intermittent short-term noise impacts resulting from construction-related activities. However, this temporary impact would be reduced via implementation of Best Management Practices (BMPs). BMPs are required at the time of building permit issuance for all development and would reduce any impacts of additional noise level exposure to insignificance. Such BMPs include requirements for construction vehicles and equipment to be

properly muffled. Construction hours would be limited to 8:00 AM to 5:00 PM, Mondays through Fridays. Construction on weekends and holidays will be prohibited to avoid inconveniencing neighbors.

Mitigation Measure: The applicant shall incorporate the following practices into the construction documents to be implemented by the project contractor:

MM NOI – 1.1:

- Maximize the physical separation between noise generators and noise receptors. Such separation includes, but is not limited to, the following measures:
 - Use heavy-duty mufflers for stationary equipment and barriers around particularly noisy areas of the site or around the entire site;
 - Use shields, impervious fences, or other physical sound barriers to inhibit transmission of noise to sensitive receptors;
 - Locate stationary equipment to minimize noise impacts on the community;
 - Minimize backing movements of equipment;
- Use quiet construction equipment whenever possible;
- Impact equipment (e.g., jack hammers and pavement breakers) shall be hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically-powered tools. Compressed air exhaust silencers shall be used on other equipment. Other quieter procedures, such as drilling rather than using impact equipment, shall be used whenever feasible;
- Prohibit unnecessary idling of internal combustion engines; and
- Select routes for movement of construction-related vehicles and equipment in conjunction with the Daly City Community Development Department so that noise-sensitive areas, including residences and schools, are avoided as much as possible.
- The project sponsor shall designate a “disturbance coordinator” for construction activities. The coordinator would be responsible for responding to any local complaints regarding construction noise and vibration. The coordinator would determine the cause of the noise or vibration complaint and would implement reasonable measures to correct the problem.
- The construction contractor shall send advance notice to neighborhood residents within 300 feet of the project site regarding the construction schedule and including the telephone number for the disturbance coordinator at the construction site.

With the implementation of the following mitigation measures, the proposed project would reduce noise impacts to a less than significant level. **(Less Than Significant Impact With Mitigation Incorporated)**

Impact NOI-2: The project would not result in generation of, excessive groundborne vibration or groundborne noise levels. **(Less than Significant Impact)**

Construction of the proposed residential development would not require pile driving or other significant vibration caused by construction activity. Therefore, the construction of the proposed

development would not generate vibration levels that exceed limits defined by the City of Daly City.
(Less Than Significant Impact)

4.13 POPULATION AND HOUSING

4.13.1 Environmental Setting

4.13.1.1 *Regulatory Framework*

4.13.1.2

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.³¹ The City of Daly City's Housing Element and related land use policies were last updated in 2014.

Regional and Local

Plan Bay Area 2040

Plan Bay Area 2040 is a long-range transportation, land-use, and housing plan intended support a growing economy, provide more housing and transportation choices, and reduce transportation-related pollution and GHG emissions in the Bay Area. Plan Bay Area 2040 promotes compact, mixed-use residential and commercial neighborhoods near transit, particularly within identified Priority Development Areas (PDAs).³² The site is not located within a PDA.

ABAG allocates regional housing needs to each city and county within the nine-county San Francisco Bay Area, based on statewide goals. ABAG also develops forecasts for population, households, and economic activity in the Bay Area. ABAG, MTC, and local jurisdiction planning staff created the Regional Forecast of Jobs, Population, and Housing, which is an integrated land use and transportation plan through the year 2040 (upon which Plan Bay Area 2040 is based).

³¹ California Department of Housing and Community Development. "Regional Housing Needs Allocation and Housing Elements" Accessed April 27, 2019. <http://hcd.ca.gov/community-development/housing-element/index.shtml>.

³² Association of Bay Area Governments and Metropolitan Transportation Commission. "Project Mapper." <http://projectmapper.planbayarea.org/>.

4.13.1.3 Existing Conditions

According to California Department of Finance 2019 Census data, Daly City's population for 2019 was 109,122 persons.³³ In 2019, there were 33,363 households with an average of 3.37 persons per household.³⁴

The jobs/housing balance is the relationship between the number of housing units required as a result of local jobs and the number of residential units available in the City. This relationship is quantified by the jobs/employed resident ratio. When the ratio reaches 1.0, a balance is struck between the supply of local housing and local jobs. The jobs/employed resident ratio is determined by dividing the number of local jobs by the number of employed residents that can be housed in local housing. The jobs/employed residents' ratio for Daly City in 2010 was 0.41, which means that there were 0.41 jobs for every employed resident in the City.

4.13.2 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 checked="" type="checkbox"/>	<input 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). (Less Than Significant Impact)
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Implementation of the project will create more housing by adding a net increase of 122 dwelling units to the City's housing supply. This increase in housing would result in a net increase in local population by approximately 411 residents.³⁵ The number of additional residents will be part of the planned growth in the General Plan, which accommodates an increased population of up to approximately 2,157 new dwelling units. Therefore, the project would not result in additional

³³ State of California, Department of Finance. E-1 Population Estimates for Cities, Counties, and the State—January 1, 2018 and 2019. July 2019. Available at: <http://www.dof.ca.gov/Forecasting/Demographics/Estimates/e-1/>

³⁴ State of California, Department of Finance. E-5 Population and Housing Estimates for Cities, Counties, and the State—2011-2019 with 2010 Census Benchmark. July 2019. Available at: <http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-5/>

³⁵ Based on the latest Department of Finance data, the average residents per household is 3.37. 3.37 residents per household x 122 net new units = 411 residents.

housing than currently anticipated in the General Plan and the impact would be less than significant.
(Less Than Significant Impact)

Impact POP-2: The project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. **(No Impact)**

The project site is currently a paved parking lot. Therefore, the City would not require replacement housing to be constructed as there is no existing housing on the property. There would be no impact.
(No Impact)

4.14 PUBLIC SERVICES

4.14.1 Environmental Setting

4.14.1.1 *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

City of Daly City Capital Plan

In 2008, the City expanded its Capital Plan to cover a 20-year period. It was estimated that 2.8 million square feet of commercial space and 2,641 residential units would be added to the City, which is slightly more than projected with the 2013 General Plan. The study also projected the extent of capital improvements for public facilities which would be needed in the City over the same time period. The City identified the capital improvements which would be needed to provide City services to all areas over the next 20 years. The relationship between the additional projected commercial and residential development and the need for improvements in public facilities were analyzed. The City formulated impact fees that are based on the extent to which any need for new public facilities is attributed to new development.

City of Daly City General Plan

Daly City General Plan Relevant Public Service Policies

Policies	Description
SE-3.1	Support and maintain the City's Insurance Service Office (ISO) rating of a Class 2, which establishes the fire insurance rates for the City.
SE-3.2	Provide for a seven (7) minute total reflex time for arrival of a first due company to 90 percent of all emergency incidents.
SE-3.3	Provide for an eleven (11) minute total reflex time for arrival of multiple fire companies to 90 percent of all structure fires.
SE-3.4	Maintain fire company reliability, whereby 90 percent of all incidents are handled by the district fire company.

4.14.1.2 *Existing Conditions*

Fire Protection

The City of Daly City is served by the North County Fire Authority (NCFA), a Joint Powers Authority (JPA) which currently serves the communities of Brisbane, Daly City, and Pacifica. The NCFA responds to all fires, hazardous materials spills, and medical emergencies in the City. The closest station to the project site is Station No. 94, located at 444 Gellert Boulevard, approximately 0.7 miles southeast of the project site.

Police Protection Service

Police protection services for the project site are provided by the Daly City Police Department, which is headquartered at 333 90th Street, approximately two miles north of the project site. The Daly City Police Department employs 111 sworn and 43 non-sworn personnel.

Schools

The project site is located within the Jefferson Elementary Unified School District, and the Jefferson Union High School District. Students in the project area would attend Daniel Webster Elementary School and Fernando Rivera Middle School. Students would attend one of the four high schools, Terra Nova High School, Oceana High School, Westmoor High School, or Jefferson High School, depending on the capacity of each facility. The closest high school to the project site is Westmoor High School, approximately 1.7 miles from the project site.

Parks

The City currently has a number of public and private recreational open spaces. Public recreational open space consists of City parks and related facilities, and State and County parks. Private recreational open space consists of private golf and country clubs which limit access only to members.

Thirteen municipal parks and twelve tot lots are located in Daly City, resulting in a total of 82.95 acres of developed public recreational open space. The City has 27 recreational facilities dispersed throughout the various City neighborhoods to serve residents. Gellert Park is located directly south of Hickey Boulevard, approximately 0.7 miles southeast of the project site.

4.14.2 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, the 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"/>

Impact PS-1: The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the 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)**

As part of the permitting process, the North County Fire Department would review project plans before permits are issued to ensure compliance with all applicable fire and building code standards and to ensure that adequate fire and life safety measures are incorporated into the project in compliance with all applicable state and city fire safety regulations. Because the proposed project is not anticipated to generate additional demand for fire protection services, and would not result in the need for new or expanded facilities, the project's potential impact on fire protection services would be less than significant. **(Less Than Significant Impact)**

Impact PS-2: The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the 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)**

The proposed project would not result in an increased demand for police services or require the expansion or construction of police facilities. The project's potential impact on police services would be less than significant. **(Less Than Significant Impact)**

Impact PS-3: The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the 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)**

According to historic enrollment rates for school districts in Daly City (2012), enrollment in Jefferson Elementary School District has remained stable, and enrollment in Jefferson Union High School District has slightly declined within the last decade. According to the Developer Fee Justification Study for Jefferson Elementary School District published in 2014, the state-wide student generation factor which identifies the number of students per housing unit is 0.5 for grades K-8.³⁶ Therefore, using this rate, the proposed project would generate approximately 61 new students that would attend Daniel Webster Elementary and Fernando Rivera Middle School. The Jefferson Union High School District has a student yield factor of 0.08 high school students per new multi-family dwelling unit.³⁷ Therefore, the residential development would result in approximately nine new students attending Terra Nova High School, Oceana High School, Westmoor High School, or Jefferson High School depending on the capacity at each facility. Table 3.11-3 of the General Plan EIR presented future enrollment within the various school districts that serve Daly City, and concluded that after accommodating modest growth in student population from General Plan buildout, the Jefferson Elementary School District would have available capacity of 693 students, and Jefferson High School District would have available capacity of 573 students. Therefore, while the proposed project involves a General Plan Amendment to allow housing and represents an additional 61 elementary students and nine new high school students beyond what was projected in the General Plan EIR, adequate capacity exists within both the elementary school and high school districts serving the project population. Under, Section 65996 of the State Government Code, payment of school impact fees established by SB 50 is deemed to constitute full and complete mitigation for school impacts from development. Fulfillment of this requirement would mitigate the development of residential uses' impacts to schools to a less than significant level. **(Less Than Significant Impact)**

³⁶ Jefferson Elementary School District. *Developer Fee Justification Study for Jefferson Elementary School District*. February 2014. Accessed July 21, 2017.

³⁷ ESA Associates. *Brisbane Baylands Draft EIR*, page 4.L-21. June 2013. Accessed July 20, 2017.

Impact PS-4:	The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the 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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The City of Daly City is served by several parks and recreational facilities, including 13 municipal parks and 12 tot lots, resulting in a total of 82.95 acres of developed public recreational open space which equals approximately 0.82 acres per 1,000 residents. However, according to the General Plan EIR, this parkland to population ratio does not take into account the numerous regional park facilities accessible to residents.

San Bruno Mountain State and County Park, a 2,063-acre park located in the Hillside Planning Area, includes multiple recreational facilities and trails. At the coastline, Thornton Beach State Park includes a panoramic overlook and parking lot adjacent to Highway 1, at the end of John Daly Boulevard. Lake Merced, which is adjacent to the city limits, north of the Westlake Planning Area, is a freshwater lake located in San Francisco but utilized by many Daly City residents due to its proximity. Lake Merced includes a circuit path all the way around as well as facilities such as picnic areas and barbeques. Additionally, the Fort Funston/Golden Gate National Recreation Area is also adjacent to the city limits, north of the Westlake Planning Area, and includes multiple trails. The abundance of regional open space around Daly City indicates that residents have access to more open space than shown in the above ratio, although these facilities are trail-oriented, rather than active facilities (such as those that include playfields).

Based on the City's current parkland dedication ratio of three acres per 1,000 residents in the Municipal Code, the City will need to provide 15.8 acres of parkland to meet future need resulting from anticipated population growth (without ameliorating existing deficiencies). To meet this demand, the General Plan proposes a task to develop part of the 140-acre undeveloped Mussel Rock area into a park for community use. The program for the park will be further developed through Program RME-3 which calls for the preparation of a Parks and Recreation Analysis and Master Plan. The Parks and Recreation Analysis and Master Plan will address existing and future opportunities for parks and recreational services for the city and guide the planning, selection, dedication and funding of future park land in the city. The Master Plan would allow priorities to be adopted and identify park site locations and development plans be determined at the time the acquisition and development process begins. The General Plan includes policies and programs to help parkland development to meet additional recreational need, which would reduce impact to a less than significant level. The existing park facilities that would serve future project residents would not suffer from physical deterioration from overuse given the modest project population and the City's ongoing maintenance activities. **(Less Than Significant Impact)**

Impact PS-5: The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the 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)**

The proposed residential development, with the addition of approximately 411 residents, would not result in the need for other government facilities, such as libraries, to be constructed. **(Less Than Significant Impact)**

4.15 RECREATION

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.

Local

Parkland Dedication

The City of Daly City Municipal Code currently has parkland dedication standards within Title 16 – Subdivisions. Section 16.30.400 of the Municipal Code has a standard for parks of three acres per 1,000 people. This requirement may be satisfied through either on-site park construction, land dedication, or an in-lieu fee equal to the land value plus ten percent towards costs of off-site improvements.³⁸

City of Daly City General Plan Policies

The General Plan includes policies for the purpose of avoiding or mitigating impacts resulting from planned development projects with the City. The following policies are specific to recreational resources and are applicable to the proposed project.

City of Daly City Relevant Recreation Policies

Policy	Description
Program RME-3	The preparation of a Parks and Recreation Analysis and Master Plan is proposed to address existing and future opportunities for parks and recreational services for the City. Envisioned as a ten-year plan, the Master Plan is to be a comprehensive document that will include a format for the planning, selection, dedication and funding of future park land in the City. A park system analysis would inventory existing park sites and outline future needs of the current park space. The proposed Master Plan will focus on the planning for new sites or expanding and/or improving existing sites. In addition, the Master Plan would allow priorities to be adopted and individual park site locations and development plans.
Task RME-12.1	Program for and undertake improvements to develop Mussel Rock Park as a passive recreational area for community use (see also Task CST-1.4). All improvements within the park shall be in substantial conformance with a Public Access Management Plan prepared for the site which shall include the following:

³⁸ City of Daly City. *Municipal Code 16.30.050*. Accessed July 20, 2017.

1. Public access paths provided in such a way as to ensure connectivity, maximize utility, and provide access along the entirety of the park site.
2. Public access amenities (such as benches, table and chairs, bicycle racks, trash and recycling receptacles, etc.), including benches in the public view overlook at appropriate locations.
3. Public access signs to facilitate, manage, and provide public access to the park, including the provision of directional signs.
4. At a minimum, two interpretive panels relevant to the site shall be provided at locations that maximize their utility.

Program RME-14 Prioritize the dispersal of park in-lieu fees collected from the development of new subdivisions to ensure that the fees are spent in the appropriate areas (see Program RME-3).

4.15.1.2 *Existing Conditions*

Thirteen municipal parks and twelve tot lots are located in Daly City, resulting in a total of 82.95 acres of developed public recreational open space. School playgrounds also provide recreational open space opportunities in the City. The City has twenty-seven recreational facilities dispersed throughout the various City neighborhoods to serve city residents.

As discussed in Section 4.14 Public Services, Gellert Park is located directly south of Hickey Boulevard, approximately 0.7 miles southeast of the project site.

4.15.2 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 will 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 in 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)**

The City of Daly City is served by several parks and recreational facilities, including 13 municipal parks and 12 tot lots, resulting in a total of 82.95 acres of developed public recreational open space which equals approximately 0.82 acres per 1,000 residents. However, according to the General Plan

EIR, this parkland to population ratio does not consider the numerous regional park facilities accessible to residents.

San Bruno Mountain State and County Park, a 2,063-acre park located in the Hillside Planning Area, includes multiple recreational facilities and trails. At the coastline, Thornton Beach State Park includes a panoramic overlook and parking lot adjacent to Highway 1, at the end of John Daly Boulevard. Lake Merced, which is adjacent to the city limits, north of the Westlake Planning Area, is a freshwater lake located in San Francisco but utilized by many Daly City residents due to its proximity. Lake Merced includes a circuit path all the way around as well as facilities such as picnic areas and barbecues. Additionally, the Fort Funston/Golden Gate National Recreation Area is also adjacent to the city limits, north of the Westlake Planning Area, and includes multiple trails. The abundance of regional open space around Daly City indicates that residents have access to more open space than shown in the above ratio, although these facilities are trail-oriented, rather than active facilities (such as those that include playfields).

Based on the City's current parkland dedication ratio of three acres per 1,000 residents in the Municipal Code, the City will need to provide 15.8 acres of parkland to meet future need resulting from anticipated population growth (without ameliorating existing deficiencies). To meet this demand, the General Plan proposes a task to develop part of the 140-acre undeveloped Mussel Rock area into a park for community use. The program for the park will be further developed through Program RME-3 which calls for the preparation of a Parks and Recreation Analysis and Master Plan. The Parks and Recreation Analysis and Master Plan will address existing and future opportunities for parks and recreational services for the city and guide the planning, selection, dedication and funding of future park land in the city. The Master Plan would allow priorities to be adopted and identify park site locations and development plans be determined at the time the acquisition and development process begins. The General Plan includes policies and programs to help parkland development to meet additional need which would reduce impact to a less than significant level.

In addition, the City of Daly City Municipal Code currently has parkland dedication standards within Title 16 – Subdivisions. Section 16.30.040 of the Municipal Code has a standard for parks of three acres per 1,000 people. In order to meet this requirement, the proposed project would be required to allot 1.16³⁹ acres of land as parkland or pay an in-lieu fee equal to the value of the land (plus ten percent toward costs of off-site improvements) according to the Municipal Code parkland dedication standard. Since the project would develop housing and is not suited for public parkland, the project proposes to pay in-lieu fees to offer recreational demand for parkland. **(Less Than Significant Impact)**

Impact REC-2:	The project would not include recreational facilities or require the construction of expansion of recreational facilities which might have an adverse physical effect on the environment. (Less Than Significant Impact)
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Please see the above discussion for Impact REC-1. **(Less Than Significant Impact)**

³⁹ 3.18 x 3 acres x 122 New Dwelling Units/ 1,000 residents = 1.16 acres of parkland

4.16 TRANSPORTATION

The following is based upon a Transportation Impact Analysis prepared for the project by Hexagon Transportation Consultants in September 2019. A copy of the report is included in Appendix E of this Initial Study.

4.16.1 Environmental Setting

4.16.1.1 *Regulatory Framework*

State

Regional Transportation Planning

The Metropolitan Transportation Commission (MTC) is the transportation planning, coordinating, and financing agency for the nine-county San Francisco Bay Area, including San Mateo 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 2040 in July 2017, which includes the region's Sustainable Communities Strategy (integrating transportation, land use, and housing to meet GHG reduction targets set by CARB) and Regional Transportation Plan (including a regional transportation investment strategy for revenues from federal, state, regional and local sources over the next 24 years).

Senate Bill 743

Senate Bill 743 (SB 743), which became effective September 2013, initiated reforms to the CEQA Guidelines to establish new criteria for determining the significance of transportation impacts that “promote the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses.” Specifically, SB 743 directs the Governor’s Office of Planning and Research (OPR) to update the CEQA Guidelines to replace automobile delay—as described solely by level of service (LOS) or similar measures of vehicular capacity or traffic congestion—with vehicle miles traveled (VMT) as the recommended metric for determining the significance of transportation impacts. OPR has approved the CEQA Guidelines implementing SB 743. Beginning on July 1, 2020, the provisions of SB 743 will apply statewide.

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, or not. Notably, projects that locate within one half mile of transit, such as this project, should be considered to have a less than significant transportation impact based on OPR guidance.

Local

San Mateo County Congestion Management Program

The City/County Association of Governments (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. Also included in the CMP is the Traffic Impact Analysis (TIA) Policy, which provides uniform procedures to analyze traffic impacts.

4.16.1.2 Methodology

Daly City Level of Service Standards

Traffic conditions were evaluated using level of service (LOS). LOS is a qualitative description of operating conditions ranging from LOS A (free-flow conditions with little or no delay) to LOS F (jammed conditions with excessive delays). The analysis methods for signalized and unsignalized intersections are described below.

Signalized Intersections

The intersection analysis for signalized intersections is based on the *2010 Highway Capacity Manual* LOS methodology. This method evaluates signalized intersection operations on the basis of average control delay time for all vehicles at the intersection. The City's General Plan has established that if the addition of project traffic degrades an intersection LOS to below LOS D during weekday morning and evening peak traffic periods, the project would have a significant impact on traffic. For intersections operating at LOS E or F, any increase in delay is considered a significant impact. The correlation between the levels of service and average control delay for signalized intersections is shown in Table 4.16-1 below.

Table 4.16-1: Signalized Intersection Level of Service Standards		
Level of Service	Description	Average Control Delay Per Vehicle (seconds)
A	Signal progression is extremely favorable. Most vehicles arrive during the green phase and do not stop at all. Short cycle lengths may also contribute to the very low vehicle delay	10.0 or less
B	Operations characterized by good signal progression and/or short cycle lengths. More vehicles stop compared to LOS A, causing high levels of average vehicle delay.	10.1 to 20.0
C	Higher delays may result from fair signal progression and/or longer cycle lengths. Individual cycle failures may begin to appear at this level. The number of vehicles stopping is significant, though may still pass through the intersection without stopping.	20.1 to 35.0
D	The influence of congestion becomes more noticeable. Longer delays may result from some combination of unfavorable signal progression, long cycle lengths, or high volume-to-capacity (V/C) ratios. Many vehicles stop and individual cycle failures are noticeable.	35.1 to 55.0

Table 4.16-1: Signalized Intersection Level of Service Standards		
Level of Service	Description	Average Control Delay Per Vehicle (seconds)
E	This is considered to be the limit of acceptable delay. These high delay values generally indicate poor signal progression, long cycle lengths, and high V/C ratios. Individual cycle failures occur frequently.	55.1 to 80.0
F	This level of delay is considered unacceptable by most drivers. This condition often occurs with oversaturation, that is, when arrival flow rates exceed the capacity of the intersection. Poor progression and long cycle lengths may also be major contributing causes of such delay levels	Greater than 80.0

Unsignalized Intersections

According to Daly City's General Plan, the minimum acceptable standard for unsignalized intersection operations is LOS D. The correlation between the levels of service and average control delay for unsignalized intersections is provided in Table 4.16-2 below.

Table 4.16-2: Unsignalized Intersection Level of Service Standards		
Level of Service	Description	Average Control Delay Per Vehicle (seconds)
A	Little or no traffic delay	10.0 or less
B	Short traffic delays	10.1 to 15.0
C	Average traffic delays	15.1 to 25.0
D	Long traffic delays	25.1 to 35.0
E	Very long traffic delays	35.1 to 50.0
F	Extreme traffic delays	Greater than 50.0

Caltrans Level of Service Standards

Some of the project's study intersections are maintained by Caltrans and are State highway facilities. As stated in the Caltrans' Guide for the preparation of Traffic Impact Studies: "Caltrans endeavors to maintain a target LOS at the transition between LOS "C" and "D" on State highway facilities, however, Caltrans acknowledges that may not always be feasible and recommends that the lead agency consult with Caltrans to determine the appropriate target LOS. If an existing State highway facility is operating at less than the appropriate target LOS, the existing Measure of Effectiveness (MOE) should be maintained." Because Daly City is the lead agency for this project, the LOS standards and impact criteria used in this report were based on Daly City standards.

Study Intersections

The traffic analysis evaluated the impacts of the proposed project on one signalized intersection and four unsignalized intersections during the weekday AM and PM peak hour and PM school peak hour periods of traffic. The AM peak hour is between 7:00 AM and 9:00 AM and the PM peak hour period is between 4:00 PM and 6:00 PM. The school PM peak hour is between 2:00 PM and 4:00 PM. The study intersections are listed below and shown on Figure 4.16-1.

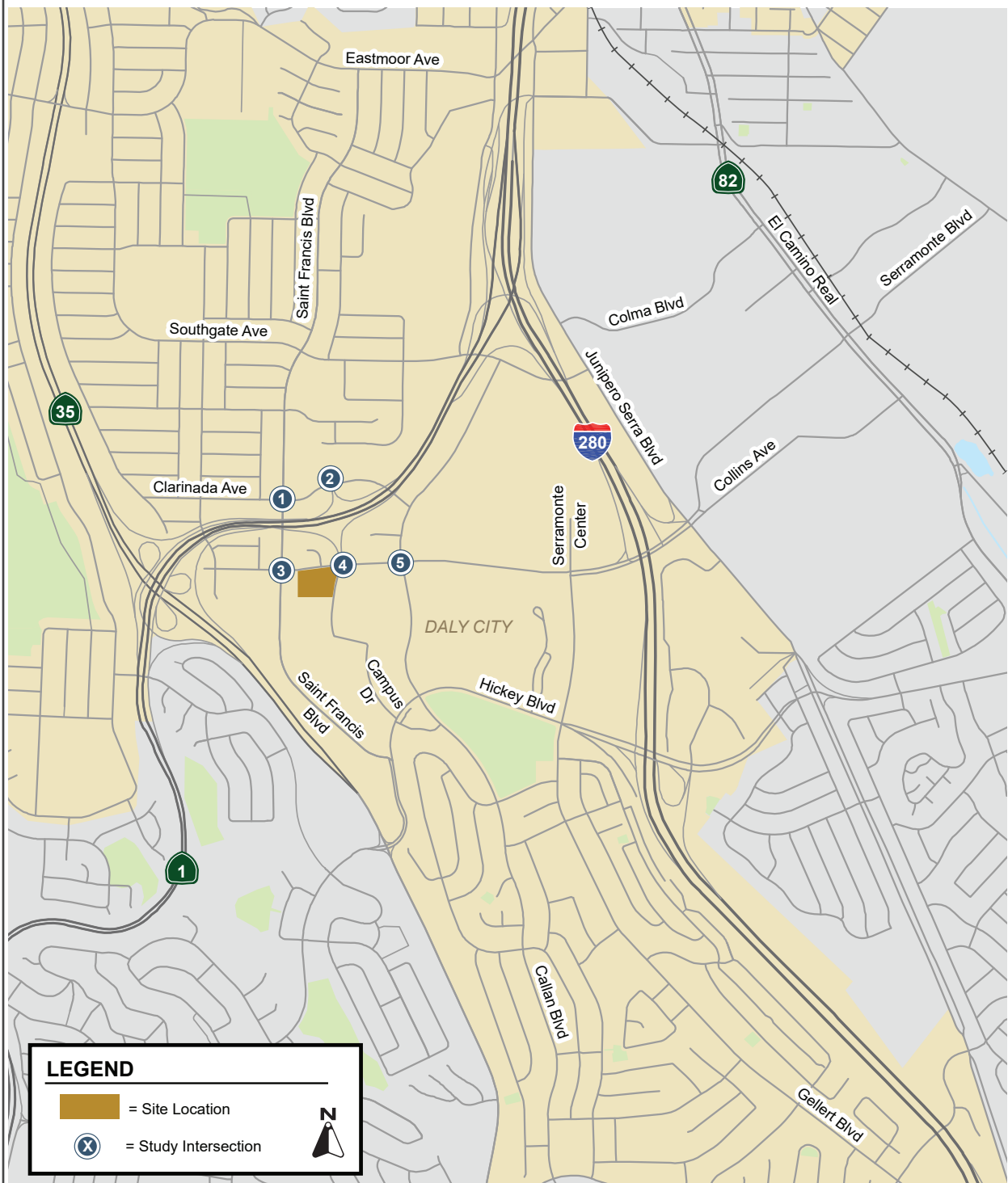
1. St. Francis Boulevard and Clarinada Avenue
2. SR 1 SB ramps and Clarinada Avenue
3. St. Francis Boulevard and Serramonte Boulevard
4. SR 1 NB ramps and Serramonte Boulevard
5. Callan Boulevard and Serramonte Boulevard

None of the study intersections are Congestion Management Program (CMP) intersections.

Traffic Scenarios Analyzed

Traffic conditions at study intersections were evaluated for two scenarios: existing conditions and existing plus project. Table 4.16-3 below describes each scenario.

Table 4.16-3: Traffic Scenarios Analyzed	
Scenario	Description
Existing Conditions	Existing conditions are represented by existing peak hour traffic volumes on the existing roadway network.
Existing Plus Project Conditions	Existing plus project conditions were estimated by adding projected project peak hour trips generated by the proposed residential project to the existing condition. Project generated traffic was estimated using data provided by the Jefferson Union School District and the vehicular trip generation rates recommended by the Institute of Transportation Engineers manual entitled <i>Trip Generation, 10th Edition</i> .



Source: Hexagon Transportation Consultants, Inc.

STUDY INTERSECTIONS

FIGURE 4.16-1

4.16.1.3 *Existing Conditions*

Roadway Network

Regional access to the project site is provided by Interstate 280 (I-280) and State Route 1 (SR 1). Local access to the project site is provided via Serramonte Boulevard, Callan Boulevard, St. Francis Boulevard, and Clarinada Avenue

Regional Access

Interstate 280 (I-280) is an eight- to twelve-lane freeway with a posted speed limit of 65 miles per hour. The north-south freeway connects Daly City with nearby cities, such as San Francisco and San Bruno, and regional destinations, such as San Jose. It also provides access to the greater freeway network with direct connections to Interstates 680 and 880, U.S. Highway 101, and State Routes 1, 92, and 85. The project is served by an interchange at Serramonte Boulevard. The Serramonte Boulevard interchange provides access to and from I-280 north of the site, via southbound off-ramps from and northbound on-ramps to I-280.

State Route 1 (SR 1) is a four- to eight-lane freeway in the vicinity of the project with a posted speed limit of 65 miles per hour. It provides regional access to the project site from San Francisco to the north via its interchange with I-280. The project is served by a hook-ramp interchange on SR 1. The northbound SR 1 off- and on-ramps at Serramonte Boulevard provide direct access into and out of the site at the SR 1 NB ramps/Project Driveway & Serramonte Boulevard intersection. Access to and from southbound SR 1 is provided by the southbound SR 1 on- and off-ramps at Clarinada Avenue.

Local Access

Serramonte Boulevard is a four-lane, east-west roadway that extends from Hillside Boulevard (in the Town of Colma) in the east, to St. Francis Boulevard in the west. The 600-foot segment of Serramonte Boulevard between St. Francis Boulevard and the SR 1 NB ramps/Campus Drive/Project Driveway intersection is two-lanes wide. Serramonte Boulevard provides direct access to the project site via the project driveway located directly opposite the SR 1 northbound ramps. The posted speed limit is 30 mph in the project vicinity.

Callan Boulevard is a two- to four-lane, north-south roadway that connects Southgate Avenue, Serramonte Boulevard, and residential land uses to the south of Hickey Boulevard. Within the vicinity of the project, parking is allowed in the east side of the roadway and sidewalks are present along both sides of the street.

Clarinada Avenue is a two- to four-lane, east-west street that connects residential land uses west of St. Francis Boulevard with Callan Boulevard and two lanes south of Serramonte Boulevard. South of Hickey Boulevard, Callan Boulevard has two lanes with a two-way center left-turn lane.

Campus Drive is a two-lane, north-south private street that provides access to both Serramonte Boulevard to the north and Hickey Boulevard to the south. It provides direct access to the project site via Serramonte Boulevard and the SR 1 northbound ramps. Campus Drive intersects Serramonte Boulevard opposite the intersection at Kent Court. Campus Drive was redesigned with a gate at the southern entrance to the district campus to prohibit access between Serramonte Boulevard and

Hickey Boulevard and is proposed as part of the current staff housing project to be realigned to intersect Serramonte Boulevard opposite the SR 1 northbound ramps.

Pedestrian and Bicycle Facilities

There are existing Class II bike lanes in the following locations near the project vicinity:

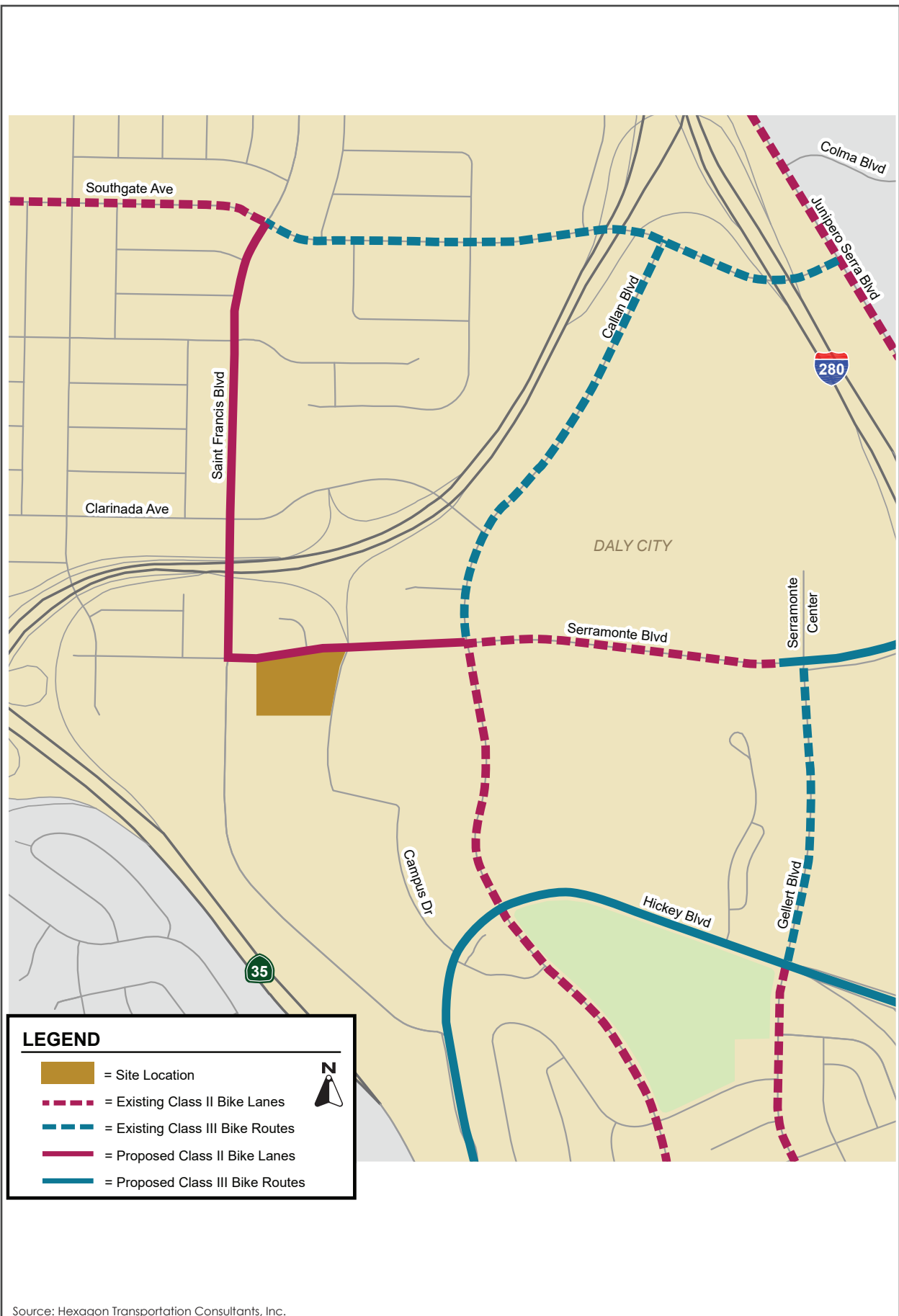
- Serramonte Boulevard between Callan Boulevard and Gellert Boulevard;
- Serramonte Boulevard between St. Francis Boulevard and Callan Boulevard
- Serramonte Boulevard between Gellert Boulevard and Junipero Serra Boulevard
- Saint Francis Boulevard between Serramonte Boulevard and Southgate Avenue
- Callan Boulevard from Serramonte Boulevard to the southern city limit at King Drive;
- Southgate Avenue west of St. Francis Boulevard;
- Gellert Boulevard south of Hickey Boulevard; and
- Junipero Serra Boulevard from F Street to Hickey Boulevard
- Hickey Boulevard between SR 35 (city limit) and Junipero Serra Boulevard

The existing Class III bike routes in the area are:

- Callan Boulevard between Serramonte Boulevard and Southgate Avenue;
- Gellert Boulevard between Serramonte Boulevard and Hickey Boulevard; and
- Southgate Avenue between St. Francis Boulevard and Junipero Serra Boulevard

Figure 4.16-2 shows the existing and proposed bicycle facilities.

Pedestrian activity was observed during the traffic counts. The count periods were 7:00 AM to 9:00 AM and 2:00 PM to 6:00 PM. Pedestrian activity at the St. Francis Boulevard/Clarinda Avenue intersection is fairly heavy, ranging between 40 and 80 pedestrian crossings per hour. Pedestrian volumes at the Callan Boulevard/ Serramonte Boulevard intersection range between 25 and 50 pedestrian crossings per hour. Pedestrian volumes directly in front of the project site were fairly light, ranging from 10 to 25 pedestrian crossings per hour.



EXISTING AND PROPOSED BICYCLE FACILITIES

FIGURE 4.16-2

Transit Service

Existing transit service to the study area is provided by the San Mateo County Transit District (SamTrans). Figure 4.16-3 shows the existing transit service routes in the study area.

SamTrans

SamTrans is the administrative body for the principal public transit and transportation programs in San Mateo County. The nearest bus service is provided by Lines 24 and 120, with bus stops directly fronting the project site. According to the U.S. Census, bus trips comprise approximately 11 percent of the total commute mode share in the City of Daly City.

SamTrans provides bus service near the project site via Routes 16, 24, 28, 112, 120, 121, 122 and 130. The Serramonte Transit Center is located in the Serramonte Shopping Center, approximately 0.5-mile from the project site, and serves Routes 16, 28, 112, 120, 121, 122 and 130. A description of all routes is provided in Table 4.16-4.

Table 4.16-4: Existing SamTrans Bus Service near the Project Site		
Bus Route	Serving	Service During Peak Periods (minutes)
16	Serramonte Shopping Center and Terra Nova High School	Limited service on school days only.
24	Summit Shasta High School and Old County Road/San Francisco Avenue	Limited service on school days only.
28	Serramonte Shopping Center and South San Francisco High School	Limited service on school days only.
112	Colma BART and Linda Mar Shopping Center	1 per hour on weekdays and weekends.
120	Brunswick/Templeton and Colma BART	4-6 per hour on weekdays, and 3-4 per hour on weekends.
121	Pop Street/Bellevue Avenue and Skyline College	2 per hour on weekdays, and 1 per hour on weekends.
122	South San Francisco BART and Stonestown/SF State	2 per hour on weekdays and weekends.
130	Airport/Linden and Serramonte Center	4 per hour on weekdays, 2 per hour on weekends.

Existing Intersection Levels of Service

The results of the intersection LOS analysis under existing conditions are summarized in Table 4.16-7. The results show that all study intersections in the project area currently operate at LOS D or better during both AM and PM peak hours, except for the intersection of the Southbound SR 1 Ramps and Clarinada Avenue which operates at LOS E during the AM Peak Hour. Additional information about existing levels of service, including the level of service calculation sheets, are included in Appendix E of this Initial Study.



EXISTING TRANSIT SERVICE ROUTES

FIGURE 4.16-3

Existing Queuing Analysis at Existing Intersections

A queuing analysis for existing intersections in the project vicinity was performed to determine the adequacy of existing vehicle storage capacity. This analysis was done using the 95th percentile queue length, which indicates the maximum queue length likely to be experienced under normal conditions. There are only two locations where the project would add significant left turn traffic where there is a left turn lane. Under existing conditions, the available queue storage length currently accommodates the existing vehicle storage for the eastbound left-turn pocket at the intersection of Callan Boulevard and Serramonte Boulevard, and the westbound left-turn pocket at the intersection of SR 1 southbound ramps and Clarinada Avenue. Left turn queues spilling out of a turn pocket are an issue because, if the left turn pocket length is inadequate, the vehicle spill over blocks the adjacent through lane.

4.16.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
1) Conflict with a plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle lanes and pedestrian paths?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2) For a land use project, 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 land uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<hr/>				
Impact TRN-1:	The project with mitigation would not conflict with a plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle lanes and pedestrian paths. (Less Than Significant Impact With Mitigation Incorporated)			

Project Trip Generation Estimates

The traffic produced by a new development and the locations where that traffic would appear are estimated using a three-step process: (1) trip generation, (2) trip distribution, and (3) trip assignment. In determining project trip generation, traffic entering and exiting the site is estimated for the AM and PM peak hours. As part of the project trip distribution, an estimate is made of the directions to and from which the project trips would travel. In the project trip assignment, the project trips are assigned to specific streets. These procedures are described further in the following sections.

Project trip estimates for the proposed project are based on trip generation rates obtained from the *Institute of Transportation Engineers' (ITE's) Trip Generation Manual, Tenth Edition*, and data provided by the District for faculty/staff housing.

The housing facility will be occupied primarily by the district workforce, comprising of school faculty and their spouses, and support staff. Based on the bell schedules of the district's high schools, faculty/school staff would typically arrive at their schools within a one-hour window between 7:00 AM and 8:00 AM, which is a narrower time frame than the typical 7:00 to 9:00 AM window represented by the ITE Trip Generation rates. This compressed departure time frame would cause the faculty/school staff trip rates to be higher than those of their spouses, which are assumed to follow the typical 7:00 to 9:00 AM departure window. Because of this, the trips generated by faculty/school staff were calculated separately using data provided by the District, as shown in Table 4.16-5.

Using the above assumptions, the workforce housing project is expected to generate a total of 92 new AM peak hour trips, 68 new school PM peak hour trips, and 68 new commute PM peak hour trips. The project generation estimates are shown in Table 4.16-5.

Table 4.16-5: Project Trip Generation Estimates									
Land Use	Commute AM Peak Hour			School PM Peak Hour			Commute PM Peak Hour		
	In	Out	Total	In	Out	Total	In	Out	Total
Trips generated by Faculty	7	66	74	41	5	46	41	5	46
Trips generated by Faculty Spouses/Domestic Partners	4	14	18	14	8	22	14	8	22
Total Project Trips	12	80	92	55	13	68	55	13	68
Sources:									
¹ District data estimates									
² Multi-Family Housing Low Rise (220) ITE Trip Generation, 10 th Edition, regression equations.									

As noted above, project trip estimates have been derived based on assumptions reflecting the intended future occupancy of the proposed units by District staff and faculty. However, for comparison purposes, the following discussion presents the expected trip generation if the proposed multi-family units were treated as a standard housing development with anyone (meeting income requirements) living there.

As shown in Table 4.16-6 below, the following information is included to compare the traffic volumes with project occupant assumptions (as outlined above) and using standard multi-family-housing assumptions (using typical ITE rates for a low-rise multi-family housing project). Using standard ITE trip generation rates, the proposed project would generate 56 AM peak hour trips and 68 PM peak hour trips. The District data assumptions used to prepare the traffic analysis are therefore conservative and assume more peak hour traffic would be generated by the project than using generic ITE rates. This is primarily a result of the assumption that District staff would be largely traveling during the 7:00-8:00AM compressed commute hour, while a generic population would travel over a two-hour window, with resulting lower peak hour volumes, i.e. more trips occur before and after the peak hour, compared to the assumptions used for the District assumptions. The net result is using

standard ITE rates would cause a decrease in peak hour trips and reduced LOS impacts, compared to what is presented below.

Table 4.16-6: Project Trip Generation Estimates using ITE Rate 220			
Land Use	Rates	Number of Dwelling Units	Total Peak Hour Trips
ITE 220 AM	0.46	122	56
ITE 220 PM	0.56	122	68
Source: ¹ Multi-Family Housing Low Rise (220) ITE Trip Generation, 10 th Edition, regression equations.			

Intersection Level of Service

The project trips, as represented in the project trip distribution discussed above, were added to existing traffic volumes to obtain existing plus project traffic volumes. Intersection levels of service were evaluated against City of Daly City and Caltrans standards. The results of the intersection LOS analysis under existing plus project conditions are summarized in Table 4.16-7 below.

Table 4.16-7: Existing and Existing Plus Project Intersection Levels of Service – Signalized Intersections						
Study Intersection	Peak Hour	Existing Condition		Existing Plus Project Condition		
		Average Delay (sec.) ¹	LOS	Average Delay (sec.) ¹	LOS	Increase in Avg. Delay
1 St. Francis & Clarinada Avenue*	AM	13.8	B	14.7	B	+0.9
	SPM	13.4	B	14.0	B	+0.6
	PM	15.8	C	16.7	C	+0.9
2 SR 1 SB Ramps & Clarinada Avenue*	AM	13.9	B	14.4	B	+0.5
	SPM	19.6	C	20.5	C	+0.9
	PM	45.4	E	48.8	E	+3.4
3 St. Francis & Serramonte Boulevard*	AM	14.7	B	15.4	C	+0.7
	SPM	11.1	B	11.8	B	+0.7
	PM	10.8	B	11.2	B	+0.4
4 SR 1 NB Ramps & Serramonte Boulevard*	AM	28.7	D	35.8	E	+7.1
	SPM	13.1	B	13.9	C	+0.8
	PM	17.0	C	18.7	C	+1.7
5 Callan Boulevard and Serramonte Boulevard	AM	25.6	C	26.7	C	+1.1
	SPM	23.8	C	23.5	C	-0.3
	PM	25.2	C	25.5	C	+0.3
Notes: BOLD text indicates an unacceptable LOS.						

Table 4.16-7: Existing and Existing Plus Project Intersection Levels of Service – Signalized Intersections						
Study Intersection	Peak Hour	Existing Condition		Existing Plus Project Condition		
		Average Delay (sec.) ¹	LOS	Average Delay (sec.) ¹	LOS	Increase in Avg. Delay
<i>Bold Italic</i> indicates a significant project impact. ¹ Delay shown for the signalized intersections is the weighted average control delay for all turning movements approaching the intersection. * Unsignalized Intersection						

The City of Daly City has a threshold of significance of LOS D for unsignalized intersections. The need for signalization is assessed on the basis of the peak-hour volume signal warrant described in the California Manual on Uniform Traffic Control Devices (CA MUTCD). This method provides an indication of whether traffic conditions and peak-hour traffic levels are, or would be, sufficient to justify installation of a traffic signal. The peak-hour volume signal warrant analysis was conducted for the four unsignalized intersections under existing and existing plus project conditions.

As shown in Table 4.16-7, the following unsignalized intersections would be impacted by the project according to the peak-hour signal warrant:

- SR 1 SB Ramps & Clarinada Avenue
- SR 1 NB Ramps & Serramonte Boulevard

Mitigation Measures:

- **MM TRN-1.1:** A traffic signal is warranted at the intersection of SR 1 southbound ramps and Clarinada Avenue. This improvement is scheduled in the City of Daly City General Plan to be constructed in the next decade. Accordingly, the applicant shall pay their fair share contribution for the improvement, and the City will implement the improvement within a 10-year timeframe, as specified in the City's General Plan.

The project would add 35 AM, 22 school PM, and 22 PM peak-hour trips to the SR 1 southbound ramps and Clarinada Avenue intersection. As a result, signalizing this intersection would improve the LOS from E to B and reduce impacts to a less than significant level. **(Less Than Significant Impact With Mitigation Incorporated)**

- **MM TRN-1.2:** A traffic signal with crosswalks across Serramonte Boulevard is warranted at the intersection of SR 1 northbound ramps and Serramonte Boulevard. This improvement is scheduled in the City of Daly City General Plan to be constructed in the next decade. Accordingly, the applicant shall pay their fair share contribution for the improvement and the City will implement the improvement within a 10-year timeframe, as specified in the City's General Plan.

The project would add 92 AM, 68 school PM, and 68 PM peak-hour trips to the intersection. As a result, signalizing this intersection would improve the LOS from E to C and reduce impacts to a less than significant level. **(Less Than Significant Impact With Mitigation Incorporated)**

Pedestrian

Overall, the volume of pedestrian trips generated by the project is expected to be relatively low and not exceed the carrying capacity of the sidewalks and crosswalks nearby. Nearly all of the streets in the project vicinity have sidewalks and crosswalks at intersections. Currently, there is an existing bus stop on the north side of Serramonte Boulevard, opposite the project site, just west of the SR 1 ramps. There is no crosswalk across Serramonte Boulevard at the SR 1 ramps intersection, and it is anticipated that the project would add to the demand for this crossing. With the implementation of TRN-1.2, the installation of a traffic signal at the intersection of SR 1 southbound ramps and Serramonte Boulevard, pedestrian crosswalks would be added at this intersection and improve pedestrian access between the existing bus stop and the project site. This improvement would require coordination with Caltrans through an Encroachment Permit since this intersection is under Caltrans' jurisdiction. **(Less Than Significant Impact With Mitigation Incorporated)**

Bicycle Facilities

According to the U.S. Census/City of Daly City General Plan, approximately one percent of the proposed project's users could be expected to commute via bike to and from the project site. For the proposed project, this would equate to approximately one new bike trip during each of the AM, school PM, and PM peak hours. The low volume of bicycle trips expected to be generated by the project would not exceed the bicycle-carrying capacity of the streets surrounding the site, and the increase in bicycle trips would not, by itself, require new off-site bicycle facilities.

There are existing Class III bike routes on Serramonte Boulevard fronting the project site. **(Less Than Significant Impact)**

Transit Service

For the proposed project, this would equate to 10 new transit trips during the AM peak hour and seven (7) new transit trips during each of the school PM and PM peak commute hours. This volume of riders would not exceed the carrying capacity of the existing bus service near the project site.

While the project would not create a significant impact to transit operations, the existing bus stop along the site frontage (on the south side of Serramonte Boulevard) west of the site driveway does not currently provide a bench or shelter. In order to encourage transit usage, and as part of the project's enhancement to the site's frontage along Serramonte Boulevard, the project would install a bus shelter or bench. Providing an upgrade to the bus stop, either with a bench or shelter, would encourage transit ridership. Therefore, the proposed project would not create an adverse impact to transit service in the area. **(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)**

According to the state's Technical Advisory on Evaluating Transportation Impacts in CEQA that was published in December 2018, affordable housing projects are presumed to have less than significant impacts on vehicles miles traveled (VMT). Specifically, the Technical Advisory explains that adding affordable housing to infill locations generally improves jobs-housing match and in turn shortens commutes and reduces VMT. Furthermore, low-wage workers in particular would be more likely to choose a residential location close to their workplace, if one is available.

In areas where existing jobs housing match is closer to optimal, affordable housing nevertheless generates less VMT than market- rate housing. Therefore, since the proposed project provides affordable housing for on-site staff at the JUHSD campus or faculty at nearby local schools, VMT impacts would be less than significant. The proposed project is also within 0.5-mile of transit, and therefore, VMT impacts would be less than significant. **(Less Than Significant Impact)**

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)**

The project access driveway on Serramonte Boulevard provides direct access to the on-site circulation via the main north-south drive aisle. The main north-south drive aisle extends approximately 260 feet southward from Serramonte Boulevard to a ninety-degree curve that extends westward about 265 feet on the main east-west drive aisle along the south frontage of the site where it connects to Campus Drive via a three-legged intersection. From the junction with Campus Drive, the main east-west drive aisle extends northwestward about 100 feet toward the project's west parking lot. The east parking lot is accessed from the main north-south drive aisle via the two previously mentioned east-west parking aisles. At its east end, the east lot also connects to the existing Perimeter Road.

Circulation in both parking lots consists of 26-foot wide, two-way drive aisles with perpendicular (90-degree) parking along both sides. The turning radii between intersecting drive aisles are not specified on the site plan, but based on the specified scale, a reasonable estimate would be an inside radius of five feet. The circulation layout in both lots provides a simple circulation pattern with no dead-end aisles and parking spaces that are generally easy to access. The proposed project would not increase hazards due to incompatible uses or design. **(Less Than Significant Impact)**

Impact TRN-4: The project would not result in inadequate emergency access. **(Less Than Significant Impact)**

The proposed project's alignments of drive aisles, and the radii of the corners and curbs are adequate to accommodate circulation of emergency vehicles and would be reviewed by City staff. Therefore, the project would not result in inadequate emergency access. **(Less Than Significant Impact)**

4.17 TRIBAL CULTURAL RESOURCES

4.17.1 Environmental Setting

4.17.1.1 *Regulatory Framework*

State

Assembly Bill (AB) 52, effective July of 2015, established a new category of resources for consideration by public agencies when approving discretionary projects under CEQA, 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. Culturally affiliated tribes must request notification of a lead agency that a project is under review. No tribes have requested to be notified by the City for projects pursuant to AB 52.

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 when it is concluded that mutual agreement cannot be reached.

Under AB 52, a 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 Resources⁴⁰
 - 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.

Senate Bill 18

The intent of Senate Bill 18 (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. SB 18 tribal consultation was initiated by the City on August 20, 2019. The City received no comment.

4.17.1.2 *Existing Conditions*

The project site is currently developed as two paved parking lots.

⁴⁰ See Public Resources Code section 5024.1. The State Historical Resources Commission oversees the administration of the CRHR and is a nine-member state review board that is appointed by the Governor, with responsibilities for the identification, registration, and preservation of California's cultural heritage. The CRHR "shall include historical resources determined by the commission, according adopted procedures, to be significant and to meet the criteria in subdivision (c) (Public Resources Code, Section 5024.1 (a)(b)).

4.17.2 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 checked="" type="checkbox"/>	<input 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 (c) of Public Resources Code Section 5024.1? In applying this criteria, the significance of the resource to a California Native American tribe shall be considered.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact TCR-1: The project would not adversely impact tribal cultural resources. **(Less Than Significant Impact With Mitigation Incorporated)**

No tribes have contacted the City to request notification under AB 52.

The project site is entirely developed with two paved parking lots and no tribal cultural resources are known to occur on the property. In the event that an inadvertent discovery of a tribal cultural resource is made, mitigation measures MM CUL-2.1, MM CUL-2.2, and MM CUL-3.1 will be implemented, as stated in Section 4.5 Cultural Resources of this Initial Study. **(Less Than Significant Impact With Mitigation Incorporated)**

4.18 UTILITIES AND SERVICE SYSTEMS

This discussion is based in part on a Hydrology and Hydraulics Technical Memorandum in August 2019 by BKF Engineers, a Hydraulic Analysis in October 2019 by Brown and Caldwell Engineers, and a Sanitary Sewer Capacity Evaluation Technical Memorandum by Woodard & Curran in October 2019. Copies of these reports are included as Appendices F, G, and H of this Initial Study.

4.18.1 Environmental Setting

4.18.1.1 *Water*

Water service to the project site is provided by the Daly City Department of Water and Wastewater Resources (DWW). The City relies on local groundwater pumping from six municipal wells and water supply purchases from the San Francisco Public Utilities Commission (SFPUC).⁴¹ The City also uses tertiary recycled water from the North San Mateo County Sanitation District wastewater treatment plant, to offset potable/aquifer water demands. Recycled water is currently available at the project site.

Currently, the water system in the project vicinity consists of a six-inch line in Serramonte Boulevard north of the site and a 10-inch water line at the norther terminus of Campus Drive, south of the project site.

4.18.1.2 *Storm Drainage*

As discussed in *Section 4.9 Hydrology and Water Quality*, the project site is located within the Colma Creek Watershed which extends from San Bruno Mountain to its outlet at the San Francisco Bay just north of the San Francisco Airport and south of Point San Bruno. The project site currently functions as a paved parking lot and contains several mature trees. The development location is tributary to a storm drain line in Serramonte Boulevard. Storm drain lines in the project area are provided and maintained by the City of Daly City Department of Water and Wastewater Resources. The City's stormdrain system is designed to retain runoff flows during a two-hour storm event with a ten-year frequency, e.g. a storm event with an intensity expected every ten or so years.

4.18.1.3 *Wastewater/Sanitary Sewer System*

Wastewater collection and treatment for Daly City is managed by the North San Mateo County Sanitation District (NSMCSD), which is a subsidiary of the City of Daly City. Wastewater produced within the District is treated at the NSMCSD Treatment Plant (WWTP), which is located at the corner of John Daly Boulevard and Lake Merced Boulevard.

Sanitary sewer lines in the project area are maintained by the City of Daly City Department of Water and Wastewater Resources. There is an existing eight-inch sanitary sewer line that extends from Campus Drive from the south to Serramonte Boulevard to the north. Flow from the site enters the City's system upstream of Serramonte Boulevard in eight-inch sewers and the continues north through the Serramonte Center development crossing the I-280 freeway to Junipero Serra Boulevard and then north along Junipero Serra Boulevard. From there, the trunk sewers flow west and north to the WWTP. Downstream of the site, there are identified capacity issues with sewer lines in the

⁴¹ City of Daly City. *General Plan Environmental Impact Report. Utilities and Service Systems*. 2012.

Serramonte Center and the 21-inch trunk sewer crossing the I-280 freeway to Junipero Serra Boulevard.

The City of Daly City's WWTP has an average dry weather flow design capacity of 10.3 million gallons per day (GPD). However, the NSMCSD discharges and operates the WWTP at or below the permitted average dry weather flow rate of eight million GPD (averaged over 3 consecutive dry months) and does not anticipate a need to increase the permitted flow rate in the next five years.

4.18.1.4 *Solid Waste*

Solid waste is collected from Daly City homes and businesses and is processed by Republic Services of Daly City at its Mussel Rock Transfer Station. Materials that cannot be recycled or composted are transferred to the Ox Mountain Sanitary Landfill near Half Moon Bay. In 2001, Browning-Ferris Industries, owner of the Ox Mountain Landfill, obtained a revised solid waste facility permit for Ox Mountain to increase the permitted disposal acreage from 173 acres to 191 acres and to change the closure date of the facility from 2018 to 2023, with a longer period of operation allowed pending renewal of the landfill's permit. According to Allied Waste, owner and operator of the Ox Mountain Landfill, the landfill is expected to reach capacity in 2028. The evaluation on volumetric capacity is ongoing at Ox Mountain. Capacity may change based on such factors such as amount of waste landfilled, compaction rates, waste settlement, and cover soil use, and therefore the closure date may also change.

4.18.1.5 *Applicable Plans, Policies, and Regulations*

Assembly Bill 939

Assembly Bill 939 (AB 939) established the CIWMB (now CalRecycle) and required all California counties to prepare integrated waste management plans. AB 939 required all municipalities to divert 50 percent of the waste stream by the year 2000.

2016 California Green Building Standards Code

The Energy Efficiency Standards for Residential and Nonresidential Buildings, as specified in Title 24, Part 6, of the California Code of Regulations (Title 24), was established in 1978 in response to a legislative mandate to reduce California's energy consumption. Title 24 is updated approximately every three years, and the 2016 Title 24 updates went into effect on January 1, 2017.⁴² Compliance with Title 24 is mandatory at the time new building permits are issued by city and county governments.⁴³

The California Green Building Standards Code (CALGreen) establishes mandatory green building standards for buildings in California. The most recent updates to CALGreen went in to effect on January 1, 2017, and covers five categories: planning and design, energy efficiency, water efficiency

⁴² California Building Standards Commission. "Welcome to the California Building Standards Commission". Accessed February 6, 2018. <http://www.bsc.ca.gov/>.

⁴³ California Energy Commission (CEC). "2016 Building Energy Efficiency Standards". Accessed February 6, 2018. <http://www.energy.ca.gov/title24/2016standards/index.html>.

and conservation, material and resource efficiency, and indoor environmental quality.

City of Daly City General Plan

The General Plan includes policies for the purpose of avoiding or mitigating impacts resulting from planned development projects with the City. The following policies are specific to utilities and service systems and are applicable to the proposed project.

City of Daly City Relevant Utilities and Service System Policies	
Policy	Description
Policy RME-1	Reduce average per capita demand by implementing cost effective water conservation programs that address all applicable methods of water conservation.
Task RME-1.1	Enforce the provisions of the Indoor Water Use Efficiency Ordinance through an extensive public outreach campaign to residents and contractors, to be completed by 2014.
Policy RME-2	Require drought resistant landscaping and water conserving irrigation methods in new development, and encourage the replacement of existing water-intensive landscaping.
Task RME-2.1	Enforce the provisions of the Water Conservation in Landscaping Ordinance and conduct a public education effort to ensure that residents, businesses, and contractors are aware of the Ordinance provisions.
Policy RME-3	Continue to use recycled wastewater for irrigating and explore opportunities to expand capacity to accommodate its use in development projects, landscaped medians, golf courses, cemeteries, parks, and school playgrounds.
Policy RME-4	For development projects which will create water demand exceeding a pre-defined amount, require that developers provide a water supply analysis for the project to demonstrate water availability to adequately serve the proposed project.
Policy RME-8	Through the development of a Stormwater Management Program, ensure that all new development complies with applicable municipal stormwater Municipal Regional Stormwater NPDES Permit by incorporating controls that reduce water quality impacts over the life of the project in way that is both technically and economically feasible, and reduces pollutants in stormwater discharges to the maximum extent practicable.
Task RME-8.4	Assess projected stormwater impacts from new development in conformance with the San Mateo County Water Pollution Prevention Program, CEQA Guidelines and relative to state and federal standards.
Task RME-8.2	Evaluate acceptable development standards for stormwater treatment mechanisms and publish such standards for distribution to developers. Such standards shall be based on a thorough evaluation of modern stormwater control mechanisms and shall, to the extent feasible, consider soil conditions in various parts of Daly City.
Policy RME-9	Balance stormwater mitigation measures with the other inherent benefits of higher density development that is in close proximity to public transit, i.e., reduction of Vehicle Miles Traveled (VMT) on local and regional roadways, to the ex-tent permitted under the Municipal Regional Stormwater Permit.

City of Daly City Relevant Utilities and Service System Policies

Policy	Description
Policy CST-7	Through the development of a Stormwater Management Program, ensure that all new development complies with applicable Municipal Regional Stormwater NPDES Permit requirements by incorporating controls that reduce water quality impacts over the life of the project in way that is both technically and economically feasible, and reduces pollutants in stormwater discharges to the maximum extent practicable.
Policy IN-3.7	Design new projects to minimize potential damage due to stormwaters and flooding to the site and other properties.

Daly City Urban Water Management Plan (2015)

The Urban Water Management Plan (UWMP) is a long range plan that assesses the City's water supply over a 25-year planning horizon (2040) to ensure adequate water supplies to meet existing and future demands for water. The UWMP presents forecasted supplies and demands, describes conservation programs, and includes a water shortage contingency analysis.

Daly City Municipal Code

Chapter 17.41, Water Conservation, establishes regulations to implement water conservation practices on existing and new landscapes. For projects containing more than 1,000 square feet of irrigated landscape, a landscape permit is required which requires irrigation design review. Further, this Chapter mandates that any owner of landscape of over one acre in size shall comply with local agency programs that may be instituted relating to irrigation audits, surveys and water use analysis, and shall maintain landscape irrigation facilities to prevent water waste and runoff.

4.18.2 Impacts Evaluation

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<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:				
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) 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"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a, b, e) Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? Would the project 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?

Pursuant to the Federal Clean Water Act and California's Porter-Cologne Water Quality Control Act, the RWQCB regulates wastewater discharges to surface waters, such as San Francisco Bay, through the NPDES program. Wastewater permits contain specific requirements that limit the pollutants it discharges. As required by the RWQCB, the WWTP monitors its wastewater to ensure that it meets all requirements. The RWQCB routinely inspects treatment facilities to ensure permit requirements are met.

Sewage from development on the project site would be treated at the WWTP in accordance with the existing NPDES permit. The 122 new residential units would contribute an estimated additional average base wastewater flow of 20,740 GPD.⁴⁴

The project proposes to relocate a portion of the existing sewer line that runs through the site to accommodate the proposed development. The proposed on-site sewer system will intercept the existing eight-inch line with the proposed roadway and install a new 10-inch sewer line that runs easterly then northerly to a manhole located near the main vehicular entrance to the campus. From this manhole, the sewer system would tie into the existing manhole in Serramonte Boulevard that the existing eight inch-line does.

⁴⁴ Sewage demand is typically 85 percent of a project's residential water demand, estimated at 24,660 GPD. Source: Woodard & Curran, Inc. *Sanitary Sewer Capacity Evaluation*. October 25, 2019.

According to a Sanitary Sewer Capacity Evaluation Technical Memorandum prepared by *Woodard & Curran*, the increased wastewater generated by the project would not cause any capacity deficiencies in the rerouted on-site sewers or in the sewers on Serramonte Boulevard downstream, however, the project flows would contribute to capacity deficient sewers in the Serramonte Center and the 21-inch trunk sewer crossing the I-280 freeway to Junipero Serra Boulevard. The need for a 30-inch relief sewer line parallel to the 21-inch sewer crossing I-280 was identified in the 2009 Collection System Evaluation and Improvement Plan, and the project would be required to contribute a proportional fair share contribution toward the construction of the relief sewer line. According to DWR staff, the relief sewer line is anticipated to be categorically exempt from CEQA, and the installation of the sewer line is anticipated to coincide with the JUHSD Faculty and Staff housing project. **(Less Than Significant Impact)**

- c) *Would the project require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?*

The project site currently functions as a paved parking lot and contains several mature trees. The proposed ground coverage consists of approximately 120,300 square feet impervious surfaces (71.5 percent impervious) and 47,970 square feet pervious surfaces (28.5 percent pervious).

The project will increase the amount of impervious surfaces from the existing condition and will require detention to control the peak flow leaving the site. Overall, the proposed condition will increase the site's impervious footprint by approximately 11,520 square feet. The proposed drainage system will consist of area drains, drop inlets, manholes, stormwater treatment areas with an overflow structure, and below grade pipes. The proposed project would have 13 drainage management areas with self-treating landscaping and bioretention zones to treat runoff. The drainage system will convey runoff to the existing outfall located near the main vehicular entrance to an existing 24-inch storm drain main in Serramonte Boulevard that flows to the east.

According to a Hydrology and Hydraulics Study prepared by *BKF Engineers*, the project would not increase the flow or volume from the 10-year storm in that post-construction stormwater runoff would be directed to adequately sized on-site retention facilities and would not exceed the City's storm drainage system capacity, and the project would not require the construction of new or expanded off-site storm drain facilities.

The City requires that the project's hydraulic calculations for both pre-construction and post-construction stormwater runoff would be provided to the City's Engineering Division. As a condition of approval, the City would require that on-site drainage would detain runoff in excess of the existing flows during a two-hour ten-year frequency storm. Flow rates entering each section of the City's storm drain system shall not exceed the pre-development condition for a two-hour ten-year frequency storm. **(Less Than Significant Impact)**

- d) *Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?*

The City DWWP purchases water from the San Francisco Public Utilities Commission (SFPUC). Although the project proposes an increased population on the project site, the project water demand has been accounted for in the City's Urban Water Management Plan. The 122 residential units with approximately 411 residents would require approximately 24,660 GPD, based on water demand of 60 gallons per capita per day.⁴⁵

Currently, the water system in the project vicinity consists of a six-inch line in Serramonte Boulevard and a 10-inch water line at the norther terminus of Campus Drive, south of the project site. The project would connect the existing 10-inch and six-inch water lines to the south and north of the site, respectively, by installing a 10-inch water line within the project site to complete a loop in the water network. Based on the technical memorandum, there is adequate capacity in the system adjacent to the site to accommodate the proposed project.

(Less Than Significant Impact)

- f, g) *Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs? Would the project comply with federal, state and local statutes and regulations related to solid waste?*

Waste generation and disposal data for Daly City is maintained by CalRecycle. According to the CalRecycle, the total amount of solid waste landfilled in 2015 was 59,861 tons, which equals a solid waste generation rate of approximately 3.0 pounds per resident per day.

Assuming this rate remains stable, the additional 411 residents projected under the proposed project would generate approximately 1,233 pounds (0.62 tons) of landfilled solid waste per day.⁴⁶ The project would increase solid waste generation in the City by substantially less than one percent and therefore would not significantly impact landfill capacity. **(Less Than Significant Impact)**

4.18.3 Conclusion

The project would not result in any utility or service facility exceeding its current capacity or require the construction of new infrastructure or service facilities. **(Less Than Significant Impact)**

⁴⁵ Hydraulic Analysis for the Jefferson Union High School District Faculty and Staff Housing Project, October 2019, Brown and Caldwell.

⁴⁶ CalRecycle Disposal Reporting System, available at www.calrecycle.ca.gov/LGCentral/Reports/DRS/Destination/JurDspFa.aspx. Accessed September 12, 2017.

4.19 WILDFIRE

4.19.1 Environmental Setting

4.19.1.1 *Existing Conditions*

The project is developed as a paved parking lot in an urban portion of Daly City. The project site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones.

4.19.2 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) Impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>

The project site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones; therefore, the project would not result in wildfire impacts. **(No Impact)**

4.20 MANDATORY FINDINGS OF SIGNIFICANCE

4.20.1 Impact Discussion

	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 type="checkbox"/>	<input checked="" 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 sections, the proposed project would not degrade the quality of the environment with the implementation of identified mitigation measures. As discussed in *Section 4.4 Biological Resources*, the project would not impact sensitive habitat or species but requires the implementation of appropriate mitigation measures for nesting preconstruction bird surveys. There are no historic buildings on-site or in the immediate project vicinity as discussed in *Section 4.5 Cultural Resources*. However, the project requires implementation of appropriate mitigation measures if project construction encounters buried archaeological resources. **(Less Than Significant Impact With Mitigation Incorporated)**

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.”

Because criteria air pollutant and GHG emissions would contribute to regional and global emissions of such pollutants, the identified thresholds developed by BAAQMD and used by the City of Daly City were developed such that a project-level impact would also be a cumulatively considerable impact. The project 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 in *Section 4.3 Air Quality* provides analysis of the cumulative health risk effects of the project’s TACs emissions during construction, and concluded those effects would be reduced to less than significant level with identified mitigation.

With the implementation of mitigation measures and standard permit conditions, residential development on the site would not result in significant geology and soils or hydrology and water quality impacts and would not contribute to cumulative impacts to these resources. Also, the project would not impact agricultural and forest resources, aesthetics, public services, cultural resources, or mineral resources and, therefore, the project would not contribute to a significant cumulative impact on these resources.

Biological Resources

The proposed project, in conjunction with cumulative projects, would not result in the loss of sensitive habitat. Nearby projects, including the Serramonte Views housing and hotel project and the Serramonte Shopping Center improvements, would require pre-construction nesting bird surveys as mitigation. Therefore, the project and other cumulative projects would have a less than significant impact on nesting birds given that the pre-construction nesting surveys ensure nesting activity is not disrupted. **(Less Than Significant Impact With Mitigation Incorporated)**

Noise

Typically, a three (3) dBA noise increase would be perceivable by sensitive receptors. In order for traffic noise to increase by 3 dBA, traffic volumes would need to double along a local roadway. Under the cumulative condition reflecting General Plan buildout roadway volumes, the proposed project and future development under the General Plan would not double existing daily traffic volumes along Serramonte Boulevard such that sensitive receptors would be affected by significant traffic related noise from cumulative projects. **(Less Than Significant Impact)**

Traffic

While there are various regional transportation improvements planned by the year 2035, it is assumed that the transportation network in the project vicinity under cumulative conditions (reflecting future growth under the General Plan and other growth forecast in the regional model used to predict General Plan buildout conditions) would be the same as that described under existing conditions. However, the City's General Plan identifies the following intersections to have installed traffic signals by 2035:

- St. Francis Boulevard and Clarinada Avenue
- SR 1 SB Ramps and Clarinada Avenue
- SR 1 NB Ramps/Project Driveway and Serramonte Boulevard

The results of the cumulative analysis show that the existing unsignalized intersection of SR 1 southbound ramps and Clarinada Avenue would operate at LOS E or worse during all peak hours both without and with the project. It also shows that the unsignalized intersection of SR 1 northbound ramps and Serramonte Boulevard would operate at LOS E or worse during the AM and PM peak hours both without and with the project. The other existing unsignalized study intersections would operate at LOS C or better during all peak hours under cumulative conditions without and with the project. An evaluation of traffic signal warrants indicates that, as in the existing plus project scenario, the signal warrant would be met for the intersections of SR 1 SB Ramps and Clarinada Avenue and SR 1 NB Ramps and Serramonte Boulevard. It is assumed that by the year 2035, the signals would already be installed (per MM TRN-1.1 and TRN-1.2) and thus the project would have a less than significant cumulative impact. **(Less Than Significant Impact With Mitigation Incorporated)**

Utilities

The several utilities analyses completed for the project presented in *Section 4.18 Utilities and Service Systems* have accounted for forecast cumulative demands based on adopted plans by the utility providers, and concluded the project would not contribute to cumulative impacts to water facilities, storm drain facilities, or solid waste facilities. The sewer capacity study concluded the project would contribute to existing capacity deficiencies in the sewers in the Serramonte Center and the 21-inch trunk sewer crossing the I-280 freeway to Junipero Serra Boulevard. The need for a 30-inch relief sewer line parallel to the 21-inch sewer crossing I-280 was identified in the 2009 Collection System Evaluation and Improvement Plan, and the project would be required to contribute a proportional fair share contribution toward the construction of the relief sewer line. According to DWR staff, the relief sewer line is anticipated to be categorically exempt under CEQA, and will be installed on approximately the same timeframe as the JUHSD Faculty and Staff Housing project. **(Less Than Significant Impact)**

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 construction TACs and noise. However, implementation of mitigation measures and General Plan policies would reduce these impacts to a less than significant level. No other direct or indirect adverse effects on human beings have been identified. **(Less Than Significant Impact With Mitigation Incorporated)**

SECTION 5.0 REFERENCES

The analysis in this Initial Study is based on the professional judgement and expertise of the environmental specialists preparing this document, based upon review of the site, surrounding conditions, site plans, and the following references:

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SECTION 6.0 LEAD AGENCY AND CONSULTANTS

6.1 LEAD AGENCY

City of Daly City

Department of Economic and Community Development

Michael Van Lonkhuysen, Planning Manager

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6.2 CONSULTANTS

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Environmental Consultants and Planners

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SECTION 7.0 ACRONYMS AND ABBREVIATIONS

AB	Assembly Bill
ABAG	Association of Bay Area Governments
ACM	Asbestos containing material
BAAQMD	Bay Area Air Quality Management District
BMP	Best Management Practice
Caltrans	California Department of Transportation
CalARP	California Accidental Release Prevention
CalEPA	California Environmental Protection Agency
CARB	California Air Resources Board
CBC	California Building Standards Code
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CEQA	California Environmental Quality Act
CMP	Congestion Management Program
CNEL	Community Noise Equivalent
CRHR	California Register of Historical Resources
CUPA	Certified Unified Program Agency
dB	Decibel
DNL	Day/Night Average Sound Level
DPM	Diesel particulate matter
DTSC	Department of Toxic Substances Control
EIR	Environmental Impact Report
EPA	United States Environmental Protection Agency
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Maps
FMMP	Farmland Mapping and Monitoring Program
GHG	Greenhouse gas
HCM	Highway Capacity Manual
ITE	Institute of Transportation Engineers
MBTA	Migratory Bird Treaty Act

MND	Mitigated Negative Declaration
MRP	Municipal Regional Stormwater NPDES Permit
MT	Metric tons
MTC	Metropolitan Transportation Commission
NHPA	National Historic Preservation Act
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NOD	Notice of Determination
NOI	Notice of Intent
OITC	Outdoor-Indoor Transmission Class
PDA	Priority Development Area
PM	Particulate matter
PPV	Peak Particle Velocity
RCRA	Resource Conservation and Recovery Act
RHNA	Regional Housing Needs Allocation
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCS	Sustainable Communities Strategy
SFHA	Special Flood Hazard Areas
SHMA	Seismic Hazards Mapping Act
SMARA	Surface Mining and Reclamation Act
STC	Sound Transmission Class
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	Toxic Air Contaminant
UST	Underground storage tank
USACE	United States Army Corps of Engineers
USFWS	United States Fish and Wildlife Service
UWMP	Urban water management plan