

Stratford School – San Bruno City Park Campus



In Consultation with



May 2020



CITY OF SAN BRUNO

Mitigated Negative Declaration

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

1. Project Title: Stratford School - San Bruno City Park Campus
2. Lead Agency Name and Address: City of San Bruno
567 El Camino Real
San Bruno, CA 94066
3. Contact Person and Phone Number: Pamela T. Wu
Planning and Housing Manager
pwu@sanbruno.ca.gov
650-616-7053
4. Project Location and APNs: 201 Balboa Way, San Bruno
020-351-430
5. Project Sponsor's Name & Address: Stratford School
12930 Saratoga Avenue
Saratoga, CA 95070
6. General Plan Designation: Low-Density Residential
7. Zoning: R-1, Single-Family Residential
8. Description of Project: Stratford School, Inc. proposes to remodel the former El Crystal Elementary School as a private preschool and kindergarten, consisting of 11 preschool and two kindergarten classes ("San Bruno City Park Campus"). The campus would have a maximum enrollment of 348 students (288 Pre-K and 60 Kindergarten). The San Bruno City Park Campus would operate in tandem with the Stratford School's existing Crestmoor Canyon Campus, located at 2322

Crestmoor Drive in San Bruno. Once the San Bruno City Park Campus is operational, some students and faculty from the existing Stratford School would transfer to the new campus.

FINDING

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

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

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

C. AIR QUALITY

Impact AIR-2.1: Without implementation of the BAAQMD best management practices, the project could result in potentially significant air quality impacts.

MM AIR-2.1: The following standard measures reflect BAAQMD best management practices and would be implemented by the project to reduce potential impacts from fugitive dust.

- 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 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 5 minutes (as required by the California airborne toxics control

measure Title 13, Section 2485 of California Code of Regulations [CCR]).

- Clear signage shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

Impact AIR-3.1: The proposed project would generate TACs during construction that could adversely expose nearby sensitive residential receptors.

MM AIR-3.1: The project shall use equipment that has low DPM or zero emissions, implementing the following measures:

- All diesel-powered off-road equipment larger than 25 horsepower, operating on the site for more than two days, shall, at a minimum, meet U.S. EPA particulate matter emissions standards for Tier 4 engines that altogether achieve an 85 percent or greater reduction in particulate matter exhaust; alternatively (or in combination) use of Tier 3 off-road diesel equipment equipped with Level 3 verified diesel emission control systems or alternatively-fueled or electric equipment (i.e., non-diesel).
- Avoid diesel generator use by supplying line power to the construction site and limiting the use of diesel generators to no more than 100 total hours during the entire construction period.
- Avoid staging of construction equipment near portions of the site that are adjacent to residences.

D. BIOLOGICAL RESOURCES

Impact BIO-2: Project implementation would impact nesting birds, including raptors and other migratory birds, if present during the time of construction.

MM BIO-1.1: To the extent feasible, initial grading and vegetation removal activities (or at least the commencement of such activities) should be scheduled to occur during the non-nesting season (September 1 to January 31). If construction activities are scheduled to take place outside of the nesting season, all impacts on nesting birds protected under the MBTA and CDFW will be avoided.

MM BIO-1.2: If it is not possible to schedule construction activities between September 1 and January 31, then pre-construction surveys shall be

conducted by a qualified ornithologist to ensure that no nests will be disturbed during project implementation. These surveys shall be conducted no more than seven days prior to the initiation of construction activities or tree relocation or removal. During this survey, the ornithologist shall inspect all trees and other potential nesting habitats within 250 feet of the limits of construction activities. If an active nest is found sufficiently close to work areas to be disturbed by these activities, the ornithologist shall determine the extent of a construction-free buffer zone (typically 250 feet for raptors and 50 feet for other species), to ensure that nests of species protected by the MBTA and CDFW shall not be disturbed during project implementation. These buffers may be increased or decreased, as appropriate, depending on the bird species and the level of disturbance anticipated near the nest.

MM BIO-1.3: If construction activities will be scheduled during the nesting season (February 1 to August 31), all potential nesting substrates (e.g., bushes, trees, grasses, and other vegetation) that are planned to be removed by the project must be removed prior to February 1st, the start of the nesting season.

E. CULTURAL RESOURCES -

Impact CUL-2.1: Construction of the proposed project could result in significant impacts to unknown archaeological resources if present on-site.

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’s Planning Manager shall consult with the archaeologist to assess the significance of the find. Impacts to any significant resources shall be mitigated to a less-than-significant level through data recovery or other methods determined adequate by a qualified archaeologist and that are consistent with the Secretary of the Interior’s Standards for Archaeological documentation. Any identified cultural resources shall be recorded on the appropriate DPR 523 (A-J) form and filed with the NWIC.

MM CUL-2.2: Worker Awareness Training. Prior to the initiation of any site preparation and/or the start of construction, the project sponsor shall ensure that all construction workers receive training overseen by a

qualified professional archaeologist who is experienced in teaching non-specialists, to ensure that contractors can recognize archaeological resources in the event that any are discovered during construction.

- F. ENERGY** - The project will not have a significant impact on this resource; therefore, no mitigation is required.
- G. GEOLOGY AND SOILS** - The project will not have a significant impact on this resource; therefore, no mitigation is required.
- H. GREENHOUSE GAS EMISSIONS** - The project will not have a significant impact on this resource; therefore, no mitigation is required.
- I. HAZARDS AND HAZARDOUS MATERIALS -**

Impact HAZ-2.1: Release of hazardous materials, specifically asbestos-containing materials and lead-based paint present on site could pose a risk to construction workers and nearby sensitive receptors during building demolition.

MM HAZ-2.1: To reduce the potential for construction workers and nearby sensitive receptors to encounter hazardous materials contamination from ACMs and lead-based paint, the following measures are included in the project.

- In conformance with local, state, and federal laws, an asbestos building survey and a lead-based paint survey shall be completed by a qualified professional to determine the presence of ACMs and/or lead-based paint on the structures proposed for demolition prior to issuance of a demolition permit for any site structure.
- A registered asbestos abatement contractor shall be retained to remove and dispose of all potentially friable asbestos-containing materials, in accordance with the NESHAP guidelines, prior to building demolition that may disturb the materials. All construction activities shall be undertaken in accordance with Cal/OSHA standards, contained in Title 8 of the California Code of Regulations (CCR), Section 1529, to protect workers from exposure to asbestos. Materials containing more than one percent asbestos are also subject to BAAQMD regulations.
- During demolition activities, all building materials containing lead-based paint shall be removed in accordance with Cal/OSHA Lead in Construction Standard, Title 8, CCR 1532.1, including employee training, employee air monitoring

and dust control. Any debris or soil containing lead-based paint or coatings shall be disposed of at landfills that meet acceptance criteria for the waste being disposed.

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

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

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

M. NOISE

Impact NOI-1.1: Construction of the project could result in temporary noise impacts to adjacent residents.

MM NOI-1.1: Implementation of the Best Management Practices below would reduce construction noise levels emanating from the site, limit construction hours, and minimize disruption and annoyance. With the inclusion of these practices and recognizing that noise and vibration generated by construction activities would occur over a temporary period, the temporary increase in ambient noise levels resulting from the project would be less than significant.

- Develop a construction noise control plan, including, but not limited to, the following available controls:
 - Limit construction hours to between 7:00 a.m. and 7:00 p.m., Monday through Friday
 - Construct temporary noise barriers to screen stationary noise-generating equipment. Temporary noise barriers shall be used during the heaviest periods of construction when there would be potential to exceed the Municipal Code limit of 85 dBA at 100 feet, or when heavy construction is occurring along shared property lines with residences. The temporary barriers shall be used during the:
 - demolition of existing structures on the eastern corner of the site and
 - when heavy ground clearing or excavation work is taking place within 50 feet of shared residential property lines.

Temporary noise barrier fences would provide a 5 dBA noise reduction if the noise barrier interrupts the line-of-sight between the noise source and receiver and if the barrier is constructed in a manner that eliminates any cracks or gaps.

- Equip all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment.
- Unnecessary idling of internal combustion engines should be strictly prohibited.
- Locate stationary noise-generating equipment, such as air compressors or portable power generators, as far as possible from sensitive receptors as feasible. If they must be located near receptors, adequate muffling (with enclosures where feasible and appropriate) shall be used to reduce noise levels at the adjacent sensitive receptors. Any enclosure openings or venting shall face away from sensitive receptors.
- Construction staging areas shall be established at locations that will create the greatest distance between the construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction.
- Control noise from construction workers' radios to a point where they are not audible at existing commercial residential uses bordering the project site.
- The contractor shall prepare a detailed construction plan identifying the schedule for major noise-generating construction activities. The construction plan shall identify a procedure for coordination with adjacent land uses so that construction activities can be scheduled to minimize noise disturbance.
- Designate a "disturbance coordinator" who would be responsible for responding to any complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., bad muffler, etc.) and will require that reasonable measures be implemented to correct the problem. Conspicuously post a telephone number for the disturbance coordinator at the construction site and include in it the notice sent to neighbors regarding the construction schedule.

Impact NOI-2.1: Groundborne vibration levels generated by construction equipment would result in a potentially significant impact at residences adjacent to the project site.

MM NOI-2.1: The following mitigation measures would reduce this impact to a less-than-significant level at residential structures located within 15 feet of the shared property line.

- Avoid using vibratory rollers and tampers within 15 feet of residences on adjacent parcels.

- Avoid dropping heavy objects or materials within 15 feet of residences on adjacent parcels.

- N. **POPULATION AND HOUSING** - The project will not have a significant impact on this resource; therefore, no mitigation is required.
- O. **PUBLIC SERVICES** - The project will not have a significant impact on this resource; therefore, no mitigation is required.
- P. **RECREATION** - The project will not have a significant impact on this resource; therefore, no mitigation is required.
- Q. **TRANSPORTATION/TRAFFIC** - The project will not have a significant impact on this resource; therefore, no mitigation is required.
- R. **TRIBAL CULTURAL RESOURCES** - In the event that an inadvertent discovery of a tribal cultural resource is made, mitigation measures MM CUL-2.1 and MM CUL-3.1 will be implemented, as stated in Section 4.5 Cultural Resources of this Initial Study.
- S. **UTILITIES AND SERVICE SYSTEMS** - The project will not have a significant impact on this resource; therefore, no mitigation is required.
- T. **WILDFIRE** – The project site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. Furthermore, the project site, while adjacent to the San Bruno City Park Wildland/Urban Interface Hazard Area, is mapped outside the City’s wildland fire hazard areas in the San Bruno General Plan. Accordingly, the project would not result in wildfire impacts.
- U. **MANDATORY FINDINGS OF SIGNIFICANCE** – With the implementation of the mitigation measures identified above, the project would not degrade the quality of the environment, substantially affect the biological resources, or eliminate important examples of California history or prehistory. The mitigation measures would also ensure that the project’s contribution to cumulative impacts would not be cumulatively considerable, and the project would not cause substantial adverse effects on human beings, either directly or indirectly.

PUBLIC REVIEW PERIOD

Before 5:00 p.m. on **May 26, 2020** any person may:

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

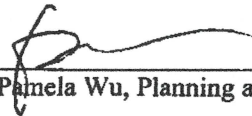

	<u>5/4/2020</u>
Pamela Wu, Planning and Housing Manager	Date
 	 <u>5/4/2020</u>
Darcy Smith, Community and Economic Development Director	Date

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- Appendix B: Phase I Environmental Site Assessment
- Appendix C: Noise and Vibration Assessment
- Appendix D: Transportation Impact Analysis

SECTION 1.0 INTRODUCTION AND PURPOSE

1.1 PURPOSE OF THE INITIAL STUDY

The City of San Bruno, as the Lead Agency, has prepared this Initial Study for the Stratford School San Bruno City Park Campus in compliance with the California Environmental Quality Act (CEQA), the CEQA Guidelines (California Code of Regulations §15000 et. seq.) and the regulations and policies of the City of San Bruno, California.

Stratford School, Inc. proposes to remodel the former El Crystal Elementary School as a private preschool and kindergarten, consisting of 11 preschool and two kindergarten classrooms, along with accessory spaces. The campus would have a maximum enrollment of 348 students (288 Pre-K and 60 Kindergarten). The project proposes to demolish the existing secondary structures (totaling 2,909 square feet) on the southeast corner of the site. Following demolition of the existing secondary structures, the existing primary structure would be expanded to include three additional classrooms, totaling 3,280 square feet. 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 20-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 20-day public review period should be sent to:

Pamela Wu, Planning and Housing Manager
City of San Bruno - Community and Economic Development Department
City Hall
567 El Camino Real
San Bruno, CA 94066

Comment may also be sent by email to: pwu@sanbruno.ca.gov

1.3 CONSIDERATION OF THE INITIAL STUDY AND PROJECT

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

1.4 NOTICE OF DETERMINATION

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

SECTION 2.0 PROJECT INFORMATION

2.1 PROJECT TITLE

Stratford School - San Bruno City Park Campus

2.2 LEAD AGENCY CONTACT

Pamela Wu
Planning and Housing Manager
City of San Bruno
567 El Camino Real
San Bruno, CA 94066
pwu@sanbruno.ca.gov

2.3 PROJECT APPLICANT

Stratford School
12930 Saratoga Avenue
Saratoga, CA 95070
Phone: (801) 712-6800

2.4 CONSULTANT

David J. Powers and Associates, Inc.
1736 Franklin St, Suite 300
Oakland, CA 94612
Contact: Natalie Noyes, Project Manager
nnoyes@davidjpowers.com

2.5 PROJECT LOCATION

The project site is located at 201 Balboa Way in the City of San Bruno. The approximately 2.73-acre site is bordered on the northwest by the San Bruno City Park, on the northeast by Cypress Avenue, and on the southeast by Balboa Way and Anza Way. The location of the project site is shown on the following figures:

- Figure 2.5-1 Regional Map
- Figure 2.5-2 Vicinity Map
- Figure 2.5-3 Aerial Photograph and Surrounding Land Uses

2.6 ASSESSOR'S PARCEL NUMBER

The Assessor's Parcel Number (APN) for the project site parcel is 020-351-430.

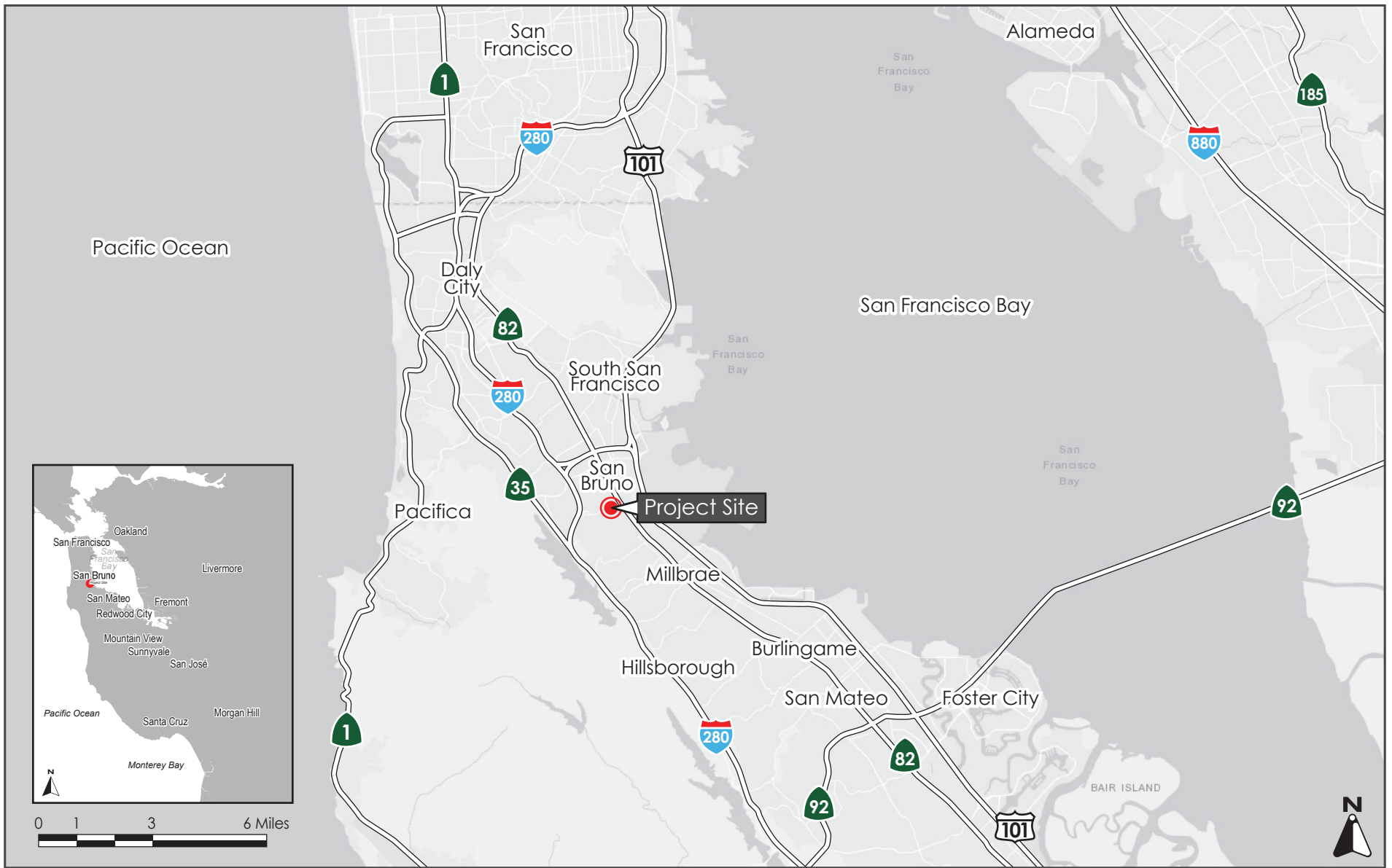
2.7 GENERAL PLAN DESIGNATION AND ZONING DISTRICT

The project site has a General Plan land use designation of *Low-Density Residential* and is zoned *R-1, Single-Family Residential*.

2.8 PROJECT-RELATED APPROVALS, AGREEMENTS, AND PERMITS

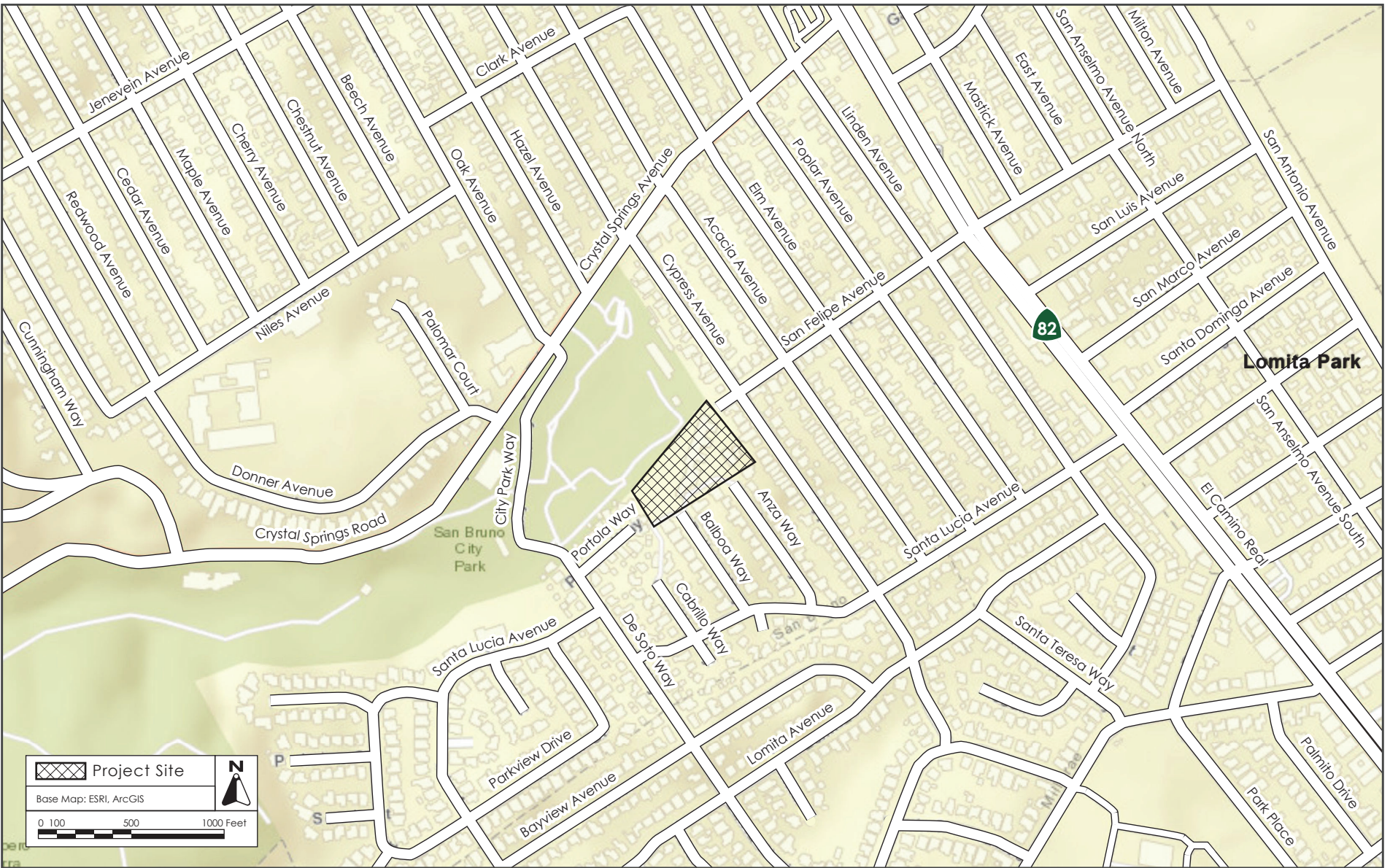
- Architectural Review Permit
- Use Permit
- Grading, demolition, construction, parking, traffic, erosion, and Storm Water Pollution Prevention Plan permits and approvals (ministerial)
- Permits for water lines, water hookups, wastewater lines, wastewater hookups
- Encroachment Permit
- Heritage Tree Removal Permit

There are no responsible or trustee agencies who would be involved in approving or carrying out the project.



REGIONAL MAP

FIGURE 2.5-1



VICINITY MAP

FIGURE 2.5-2



AERIAL AND SURROUNDING LAND USES

FIGURE 2.5-3

SECTION 3.0 PROJECT DESCRIPTION

3.1 PROJECT LOCATION

The project site is located at 201 Balboa Way in the City of San Bruno (APN: 020-351-430). The approximately 2.73-acre site is bordered on the northwest by the San Bruno City Park, on the northeast by Cypress Avenue, and on the southeast by Balboa Way and Anza Way. Single-family residential neighborhoods are present to the east, south, and west of the project site.

3.2 PROJECT DESCRIPTION

Stratford School, Inc. proposes to remodel the former El Crystal Elementary School as a private preschool and kindergarten, consisting of 11 preschool and two kindergarten classes (“San Bruno City Park Campus”). The campus would have a maximum enrollment of 348 students (288 Pre-K and 60 Kindergarten). The San Bruno City Park Campus would operate in tandem with the Stratford School’s existing Crestmoor Canyon Campus, located at 2322 Crestmoor Drive in San Bruno. Once the San Bruno City Park Campus is operational, some students and faculty from the existing Stratford School would transfer to the new campus.

3.2.1 Existing Development

The project site is currently occupied by the former El Crystal Elementary School¹, which consists of existing primary and secondary structures (totaling 21,569 square feet), paved outdoor play areas, three playgrounds, and surface parking areas. The project site has a General Plan designation of Low Density Residential and is located in the Single-Family Residential (R-1) Zoning district. During the final year of operation, the El Crystal Elementary School had a student enrollment of 262 students in grades K through 6.

The current site provides only ten parking spots for the entire campus. The existing development is shown on Figure 3.2-1: Existing Site Plan.

3.2.2 Proposed Development

The project proposes to redevelop the site as a private school campus. The school would support approximately 348 students and 35 faculty members and staff. The campus redevelopment would include the demolition of the existing secondary structures (totaling 2,909 square feet) on the southeast corner of the site. The existing play areas would also be removed. Following demolition of the existing secondary structures and play areas, the existing primary structure would be expanded to include three additional classrooms. The additional classrooms would have a total floor area of 3,280 square feet. This would result in an approximately 371 square-foot net increase over existing conditions. The proposed development is shown on Figure 3.2-2: Proposed Site Plan.

¹ The El Crystal Elementary School was operational until June 2018.

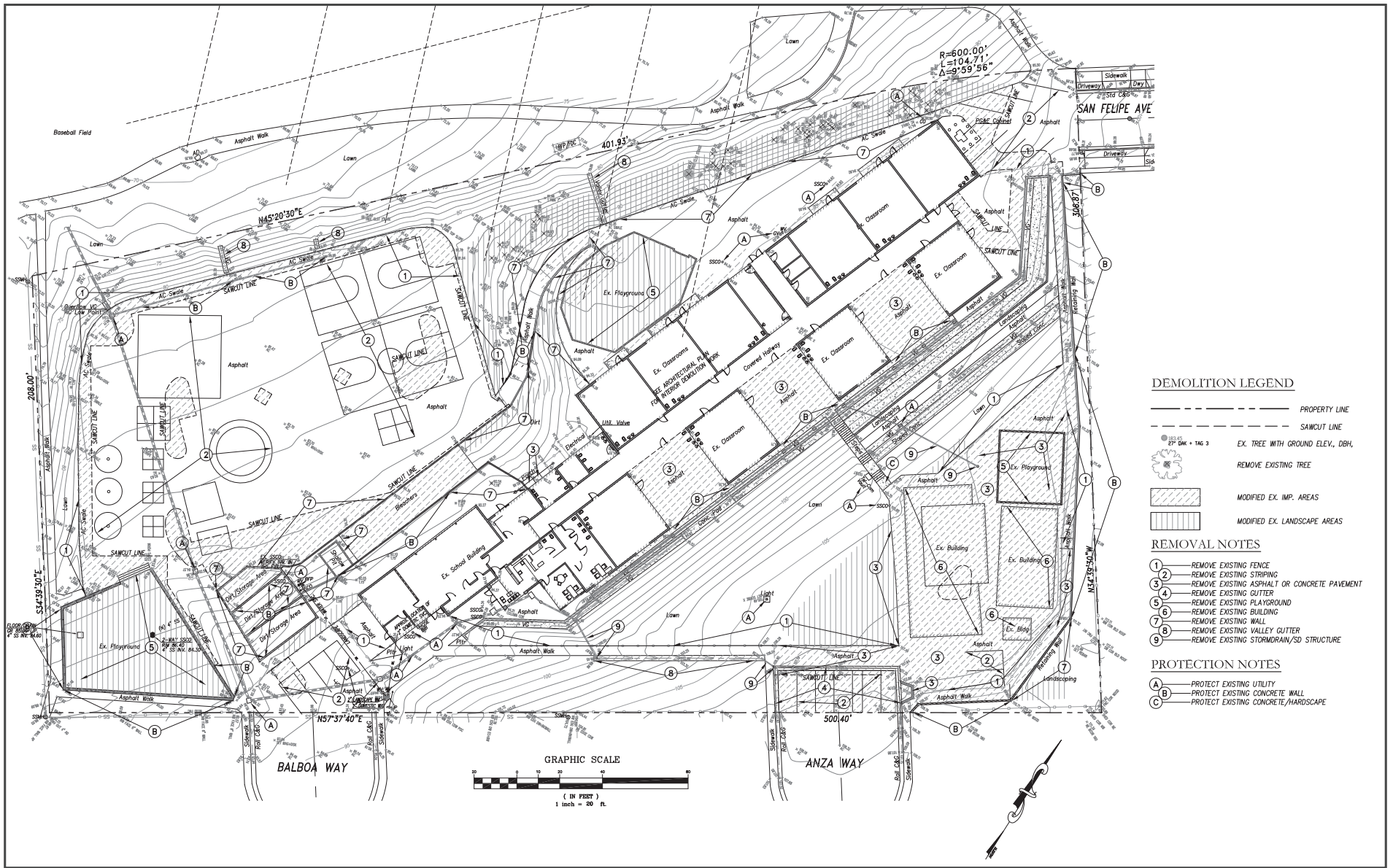


FIGURE 3.2-1

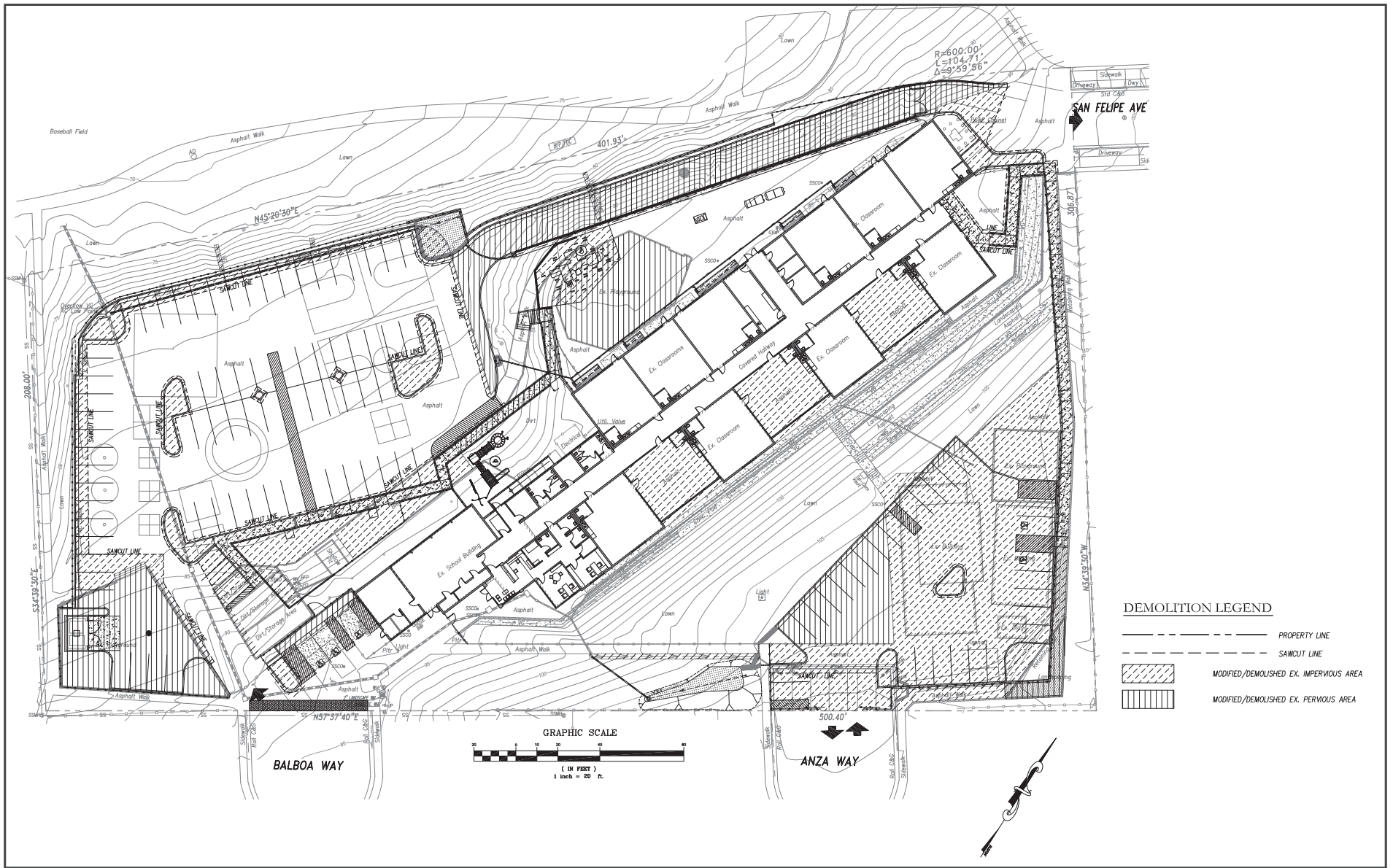


FIGURE 3.2-2

3.2.4 Site Access, Circulation, and Parking

Parents and students would access the campus from Balboa Way via a one-way driveway and exit onto San Felipe Avenue. The proposed school would also implement a staggered arrival and departure schedule for students, with students arriving between 8:15am and 1:00pm and departing between 11:30am and 6:00pm depending on which program the student is enrolled in (i.e. morning-only, afternoon-only, or full day program). ‘Extended Care’ options would also be available for families that need to bring their children before the morning session begins or pick them up after the afternoon session ends.

A new 83-space surface parking lot would be constructed on the northwest portion of the site. The project also proposes to construct a 29-space staff parking area accessible via Anza Way. The project would include six bicycle racks and two bicycle lockers.

3.2.5 Landscaping and Stormwater Control

The project site is currently developed with the former El Crystal Elementary School and contains numerous mature trees on-site. The project proposes to remove 29 heritage trees and plant approximately 43 replacement trees. The majority of trees, shrubs, and grasses planted would be drought-tolerant species. The conceptual landscape plan for the project is shown on Figure 3.2-3.

The project would replace and install 31,500 square feet of impervious surface on-site, a net increase of approximately 6,000 square feet. The project would convey runoff water to two bioretention areas on-site.

3.2.6 Utility Improvements

The project would connect to existing water, sewer, and electrical lines. Approximately 200 linear feet of storm drain on-site would be replaced to maintain the connection to the City’s storm-water lines. A new irrigation backflow preventer, master control valve, and flow sensor would be connected to the existing domestic water meter. In addition, the project would replace an existing fire hydrant located at Cypress Avenue and San Felipe Avenue.

3.2.7 Green Building and Energy Efficiency Measures

Green building project elements include the use of construction materials that are recycled, non-solvent, reduce the release of volatile organic compounds (VOCs), and maximize the reflectance of light in flat roof areas. All mechanical units would be Energy Star certified and the existing solar panels would be maintained. New exterior doors and windows will have insulated “low E” glazing and will be supplemented with tinting to allow for greater insulating values. These measures will be complemented by efficient daylighting techniques which would reduce air conditioning demands.

3.2.8 Construction

Construction of the project would occur over a period of approximately eight months, beginning in December 2020. Stratford School plans to begin operating in Fall of 2021. Approximately 510 cubic yards (CY) of material would be transported during earthwork.



SECTION 4.0 ENVIRONMENTAL SETTING, CHECKLIST, AND IMPACT DISCUSSION

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

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

The discussion for each environmental subject includes the following subsections:

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

4.1 AESTHETICS

4.1.1 Environmental Setting

4.1.1.1 *Regulatory Framework*

State

Streets and Highway Code Sections 260 through 263

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

In San Mateo County, there are three state-designated scenic highways, including California State Route 1 (SR-1) segment between south of Half Moon Bay to the Santa Cruz County line (approximately ten miles southwest from the project site), Interstate 280 (I-280) segment near the City of San Bruno to Santa Clara County line (approximately 0.6 miles west from the project site), and California State Route 35 (SR-35) segment between State Route 92 (SR-92) intersection to Santa Cruz County Line (approximately eight miles southeast from the project site). Interstate 280 is the only state-designated scenic highway within the San Bruno city limits.

Local

City of San Bruno General Plan

A scenic corridor is defined in the San Bruno General Plan as a “roadway or highway with unique or distinctive physical or cultural features”. The General Plan identifies one state-designated scenic corridor, Interstate 280, and one local scenic corridor, Skyline Boulevard (Highway 35), eligible for designation as a State Scenic Highway. The county-designated scenic roads within San Bruno are Crystal Springs Road, El Camino Real, and Sharp Park Road. San Bruno has also designated Sneath Lane as a scenic corridor.

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

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

Policies	Description
LUD-3	During Plan review, protect the residential character of established neighborhoods by ensuring that new development conforms to surrounding design and scale.
LUD-73	Require buildings with a continuous façade of 100 feet or longer to use non-reflective materials to minimize adverse impact of glare.
T-C	Preserve and enhance the unique natural features that constitute San Bruno’s scenic roadways, as well as the visual quality of major gateways into the city.

Policies	Description
T-26	Continue to limit widening, modification, or realignment of the city’s scenic corridors, consistent with Ordinance 1284. Preserve large trees and other natural features, limit signage, maintain wide setbacks, and reduce traffic speeds along these roadways.
T-28	Recognize and protect the following as local scenic corridors: <ul style="list-style-type: none"> • Skyline Boulevard, State Scenic Highway • Crystal Springs Road, County Scenic Road • Sharp Park Road, County Scenic Road • Sneath Lane
T-32	Encourage design of public and private development to frame vistas of the Downtown, public buildings, parks, and natural features.
OSR-34	Protect mature trees, as feasible, during new construction and redevelopment. Require identification of all trees over six inches in diameter and approval of landscaping plans during design review.
ERC-10	Require incorporation of native plants into landscape plans for new development as feasible—especially in areas adjacent to natural areas, such as canyons or scenic roadways (Figure 6-1). Require preservation of mature trees, as feasible, during design and construction.
PFS-2	Implement a Street Lighting and Sidewalk Maintenance Program for residential neighborhoods throughout the city. Underground utility wires wherever feasible.

San Bruno Municipal Code

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

Ordinance 1284

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

4.1.1.2 *Existing Conditions*

The approximately 2.73-acre site contains single-story buildings, paved areas for parking and recreational activities, playground structures with fall surfaced areas,² minimal fencing, and extensive landscaping that includes 30 heritage trees and grass lawns. Structures are primarily rectangular or square buildings painted white with blue eaves, with mechanical units and solar panels on the rooftops. Notable views from the project site are limited to the San Bruno City Park immediately west of the property, as the scenic resources identified by the City in Section 4.1.1.1 are not visible from the property.

² Fall surfacing typically consists of a unitary surface material such as rubber tile or another artificial surface, and/or loose-fill material such as wood products (tanbark), sand, pea gravel, or crumb rubber.

Two scenic corridors, Crystal Springs Road and El Camino Real, are located within 0.25 mile from the project site, which is not visible from either roadway. The property is bordered by residential uses to the north, east, and south, with the west occupied by open space in use as the San Bruno City Park.

4.1.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
1) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? ³ 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 project site is not located within or near any scenic view corridors or scenic vistas. The only scenic resource identified by the City visible from the project site is the San Bruno City Park, which is designated as open space in the San Bruno General Plan. Remodeling of the existing facilities on-site and additions to the existing structure would not increase building height or substantially reduce or alter views from the San Bruno City Park. (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)

The project site is not located along a scenic highway; further the site has been disturbed and developed with the former El Crystal Elementary School. The nearest state-designated highway, Interstate 280, is located approximately 0.6 mile from the project site and the site is not visible from Interstate 280. Additionally, there are no rock outcroppings or historic buildings present. There are

³ Public views are those that are experienced from publicly accessible vantage points.

30 heritage trees onsite, of which 29 would be removed as part of the proposed project. Replacement trees would be planted in accordance with the City's tree preservation guidelines. Therefore, impacts to scenic resources would be less than significant. **(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 proposes to demolish the existing secondary structures (totaling 2,909 square feet) and construct 3,280 square feet of new classrooms. As shown in Figures 4.1-1, 4.1-2, and 4.1-3, the new classrooms would be consistent to the existing classrooms in height and design. The project would also remove the existing play structures, a wood deck, and existing fencing as well as landscaping improvements. Planting of replacement trees, landscaping, and the installation of new fencing along this border would be consistent with the current visual character of the project site and would not degrade public views of the site and its surroundings.

No elements of the proposed redevelopment conflicts with City-specific design guidelines, height limits, building density, building design and landscaping standards, architectural features, and open space and setback requirements as described in Title 12, Land Use, Article III, Zoning of the San Bruno Municipal Code. The proposed building would be approximately 13 feet tall, which would not exceed the height of the existing facilities, which are approximately 20 feet tall at their highest point. Additionally, the final designs would be subject to the City's Planning Review Process, which requires an Architectural Review Permit and a Use Permit, which would be reviewed by the Architectural Review Committee and considered for approval by the Planning Commission. Accordingly, the proposed redevelopment would not be in conflict with regulations governing scenic quality. **(Less than Significant Impact)**



VIEW OF PROPOSED NEW ENTRY TO SCHOOL FROM BALBOA WAY

FIGURE 4.1-1



VIEW OF PROPOSED PARKING LOT LOOKING EAST

FIGURE 4.1-2



VIEW OF PROPOSED DRIVE AISLE EXIT ONTO SAN FELIPE AVENUE

FIGURE 4.1-3

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)**

New sources of light to be introduced by the project include the addition of new light poles equipped with external light and glare shielding as well as control options for motion detection and time-oriented lighting. Lighting would be installed in the parking lots and along the site perimeter. The project's lighting plan is consistent with City requirements regarding the illumination of public areas and with Municipal Code Section 12.100.080 regarding lighting adjacent to residential areas. In addition, the proposed lighting associated with the school would not be substantially different from the previous El Crystal Elementary School lighting. The proposed project will use non-reflective materials in accordance with General Plan policy LUD-73. A lighting plan will be reviewed by the City to ensure that lighting is directed downward and will not spill over onto adjacent properties or otherwise be highly visible. **(Less than Significant Impact)**

4.2 AGRICULTURE AND FORESTRY RESOURCES

4.2.1 Environmental Setting

4.2.1.1 *Regulatory Framework*

State

Farmland Mapping and Monitoring Program

The California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP) assesses the location, quality, and quantity of agricultural land and conversion of these lands over time. Agricultural land is rated according to soil quality and irrigation status. The best quality land is called Prime Farmland. In CEQA analyses, the FMMP classifications and published county maps are used, in part, to identify whether agricultural resources that could be affected are present on-site or in the project area.⁴

California Land Conservation Act

The California Land Conservation Act (Williamson Act) enables local governments to enter into contracts with private landowners to restrict parcels of land to agricultural or related open space uses. In return, landowners receive lower property tax assessments. In CEQA analyses, identification of properties that are under a Williamson Act contract is used to also identify sites that may contain agricultural resources or are zoned for agricultural uses.⁵

Fire and Resource Assessment Program

The California Department of Forestry and Fire Protection (CAL FIRE) identifies forest land, timberland, and lands zoned for timberland production that can (or do) support forestry resources.⁶ Programs such as CAL FIRE's Fire and Resource Assessment Program and are used to identify whether forest land, timberland, or timberland production areas that could be affected are located on or adjacent to a project site.⁷

4.2.1.2 *Existing Conditions*

The project site is developed, and the proposed use is consistent with the site's use history as well as its *Low-Density Residential* land use designation and *R-1 (single-family residential)* zoning district. The *San Mateo County Important Farmlands 2018 Map* designates the project site as "Urban and Built-Up Land", defined as land with at least six structures per 10 acres. Common examples of

⁴ California Department of Conservation. "Farmland Mapping and Monitoring Program." Accessed April 26, 2019. <http://www.conservation.ca.gov/dlrp/fmmp/Pages/Index.aspx>.

⁵ California Department of Conservation. "Williamson Act." <http://www.conservation.ca.gov/dlrp/lca>.

⁶ Forest Land is land that can support 10 percent native tree cover and allows for management of forest resources (California Public Resources Code Section 12220(g)); Timberland is land not owned by the federal government or designated as experimental forest land that is available for, and capable of, growing trees to produce lumber and other products, including Christmas trees (California Public Resources Code Section 4526); and Timberland Production is land used for growing and harvesting timber and compatible uses (Government Code Section 51104(g)).

⁷ California Department of Forestry and Fire Protection. "Fire and Resource Assessment Program." Accessed April 26, 2019. <http://frap.fire.ca.gov/>.

“Urban and Built-Up Land” are residential, institutional, industrial, commercial, landfill, golf course, airports, and other utility uses. The site is not under a Williamson Act contract and there are no existing agricultural or forestry resources on or in the vicinity of the site.

4.2.2 Impact Discussion

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

Note: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

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 2018* 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.⁸ 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)**

The project site is not designated as farmland or zoned for agricultural use and is not the subject of a Williamson Act contract. The surrounding area is urbanized and not zoned for agricultural use or considered farmland. Accordingly, there is no conflict with existing zoning for agricultural use or a Williamson Act contract. **(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)**

As covered in the Impact AG-3 discussion, the project site and surrounding area is not used or zoned for timberland or forest land. Since the site is urban and built-up land surrounded by urbanized areas it could not support forest land or timberland. As the site is absent of forestry resources, the proposed

⁸ California Department of Conservation, Division of Land Resource Protection. *San Mateo County Important Farmland 2019 Map*. September 2019.

development would not result in the loss of forest land or conversion of forest land to non-forest use. **(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)**

Both the project site and surrounding area are urbanized with no presence of designated farmland, forest land, or used or zoned for agriculture. As a result, the implementation of the proposed project would not result in the conversion of farmland to non-agricultural use or forest land to non-forest uses. **(No Impact)**

4.3 AIR QUALITY

4.3.1 Environmental Setting

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.⁹ 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. 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

⁹ 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.

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).¹⁰ 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.

4.3.1.1 *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.

¹⁰ California Air Resources Board. "Overview: Diesel Exhaust and Health." Accessed June 16, 2018. <https://www.arb.ca.gov/research/diesel/diesel-health.htm>.

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.¹¹

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.

¹¹ BAAQMD. *Final 2017 Clean Air Plan*. April 19, 2017. <http://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans>.

Local

City of San Bruno General Plan

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

Policies	Description
ERC-13	Through environmental review, assure that all projects affecting resources of regional concern (e.g., the San Francisco garter snake habitat, water and air quality, the San Francisco Fish and Game Reserve) satisfy regional, State and federal laws.
ERC-25	Maintain and improve air quality by requiring project mitigation, such as Transportation Demand Management (TDM) techniques, where air quality impacts are unavoidable.
ERC-26	Require dust abatement actions for all new construction and redevelopment projects.
ERC-33	Require all large construction projects to mitigate diesel exhaust emissions through use of alternate fuels and control devices.

4.3.1.2 *Existing Conditions*

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

Sensitive receptors in the vicinity of the project site include residences to the northeast, southeast, south, and southwest. The nearest residences are located within 30 feet of the project site.

4.3.3 Impact Discussion

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

4.3.3.1 *Thresholds of Significance*

Impacts from the Project

As discussed in CEQA Guidelines Section 15064(b), the determination of whether a project may have a significant effect on the environment calls for judgment on the part of the lead agency and must be based to the extent possible on scientific and factual data. The City of San Bruno has considered the air quality thresholds updated by BAAQMD in May 2017 and regards these thresholds to be based on the best information available for the San Francisco Bay Area Air Basin and conservative in terms of the assessment of health effects associated with TACs and PM_{2.5}. The BAAQMD CEQA Air Quality thresholds used in this analysis are identified in Table 4.3-2 below.

Table 4.3-2: BAAQMD Air Quality Significance Thresholds ¹²			
Pollutant	Construction Thresholds	Operation Thresholds	
	Average Daily Emissions (pounds/day)	Annual Daily Emissions (pounds/year)	Annual Average Emissions (tons/year)
Criteria Air Pollutants			
ROG, NO _x	54	54	10
PM ₁₀	82 (exhaust)	82	15
PM _{2.5}	54 (exhaust)	54	10
CO	Not Applicable	9.0 ppm (eight-hour) or 20.0 ppm (one-hour)	
Fugitive Dust	Dust Control Measures/Best Management Practices	Not Applicable	
Health Risks and Hazards for New Sources (within a 1,000-foot Zone of Influence)			
Health Hazard	Single Source	Combined Cumulative Sources	
Excess Cancer Risk	10 per one million	100 per one million	
Hazard Index	1.0	10.0	
Incremental Annual PM _{2.5}	0.3 µg/m ³	0.8 µg/m ³ (average)	

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

The BAAQMD's 2017 Clean Air Plan (2017 CAP) prepared for the Bay Area air basin defines an integrated, multi-pollutant control strategy to reduce emissions of particulate matter, TACs, ozone precursors, and GHGs. The proposed control strategy is designed to complement efforts to improve air quality and protect the climate that are being implemented by partner agencies at the state, regional, and local scale. The control strategy encompasses 85 individual control measures. The control measures describe specific actions to reduce emissions of air and climate pollutants from the full range of emission sources and is based on the following four key priorities:

- Reduce emissions of criteria air pollutants and TACs from all key sources.
- Reduce emissions of “super-GHGs” such as methane, black carbon, and fluorinated gases.
- Decrease demand for fossil fuels (gasoline, diesel, and natural gas).
- Decarbonize our energy system.

¹² Bay Area Air Quality Management District. *California Environmental Quality Act Air Quality Guidelines*. May 2017.

The proposed project supports the primary goals of the 2017 CAP in that it does not exceed the BAAQMD thresholds for construction and operational air pollutant emissions (as discussed in Impact AIR-2 below). In addition, the proposed project is considered urban infill, and would be located adjacent to residents and two San Mateo County Transit District (SamTrans) bus routes, which connect to BART and Caltrain.¹³ Because the project is located near residences and transit, the proposed school would not preclude implementation of the 2017 CAP control measures and would not conflict with or obstruct implementation of the 2017 CAP. The project, therefore, would not result in a significant impact related to consistency with the 2017 CAP. **(Less Than Significant Impact)**

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

Operational Criteria Air Pollutants

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

According to the BAAQMD thresholds, a project that generates more than 54 pounds per day of ROG (reactive organic gases), NO_x, or PM_{2.5}; or 82 pounds per day of PM₁₀ would be considered to have a significant impact on regional air quality. The BAAQMD developed screening criteria to provide lead agencies with an indication of whether a project could result in significant operational air quality impacts (e.g., daily or annual emissions above stated thresholds). Screening criteria are used to determine the extent of additional analysis required for a specific project. If a project is determined to be below the BAAQMD's screening criteria for a specific pollutant, then the project is said to have less than significant operational air quality impacts and no further analysis is required under CEQA.

Operational criteria air pollutant emissions from the proposed project would be generated primarily from vehicles driven by employees and families as well as waste disposal and energy and water usage associated with daily operations. Operational-related criteria air emissions from the project (approximately 21,868 square feet) would be below the BAAQMD screening threshold of 271,000 square feet for an "Elementary school" land use type. Therefore, the project would result in a less than significant air quality impact due to operational-related criteria air pollutant emissions. **(Less than Significant Impact)**

¹³ San Mateo County Transit District. *SamTrans Bus Route Maps*. Date accessed February 18, 2020. Effective January 2020. <http://www.samtrans.com/schedulesandmaps/maps.html>

Carbon Monoxide

According to the BAAQMD's screening criteria for localized CO, impacts are considered less than significant if:

- 1) The project is consistent with an applicable congestion management program established by the county's congestion management agency for designated roads or highways, regional transportation plan, and local congestion management agency plans.
- 2) The project would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour.
- 3) The project would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway).

A traffic impact analysis was prepared by Fehr and Peers that analyzed six intersections that would be affected by the proposed project (see Section 4.17, Transportation). The results of the analysis show that the highest peak-hour traffic volumes resulting from the project would be 256 trips. The net increase in vehicle trips resulting from the proposed project would not exceed 44,000 vehicles per hour at any intersection or 24,000 vehicles per hour where vertical and/or horizontal mixing of pollutants and atmosphere is substantially limited. Consistent with the approved project, the proposed project would result in a less than significant CO impact. **(Less than Significant Impact)**

Construction Criteria Air Pollutants

Construction-related criteria air emissions from the project would be below the BAAQMD screening threshold of 277,000 square feet for an "Elementary school" land use type. Therefore, the project, which would entail approximately 21,868 square feet of construction, would result in a less than significant air quality impact due to construction-related criteria air pollutant emissions. **(Less than Significant Impact)**

Construction Dust

Construction activities, particularly during site preparation and grading, would temporarily generate fugitive dust in the form of PM10 and PM2.5. Sources of fugitive dust would include disturbed soils at the construction site and trucks carrying uncovered loads of soils. Unless properly controlled, vehicles leaving the site would deposit mud on local streets, which could be an additional source of airborne dust after it dries. The BAAQMD CEQA Air Quality Guidelines consider these impacts to be less than significant if best management practices are implemented to reduce these emissions.

Impact AIR-2.1: Without implementation of the BAAQMD best management practices, the project could result in potentially significant air quality impacts. **(Potentially Significant)**

Mitigation Measures:

MM AIR-2.1: The following standard measures reflect BAAQMD best management practices and would be implemented by the project to reduce potential impacts from fugitive dust.

- 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 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

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

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 qualitative health risk assessment of the project construction activities was conducted that evaluated potential health effects of sensitive receptors at these nearby residences from construction emissions of DPM and PM_{2.5}.

As discussed previously, sensitive receptors (residences) are located within 30 feet of the project site. Given the close proximity of sensitive receptors to the project site, construction activities are considered to result in potentially significant impacts in terms of excess cancer risk to any infants¹⁴ present or increased annual PM_{2.5} concentrations caused by construction equipment and traffic exhaust and fugitive dust.

Impact AIR-3.1: The proposed project would generate TACs during construction that could adversely expose nearby sensitive residential receptors. **(Potentially Significant Impact)**

Mitigation Measures: The project would implement measures during all phases of construction to reduce exposure to nearby sensitive receptors to TAC emissions.

MM AIR-3.1: The project shall use equipment that has low DPM or zero emissions, implementing the following measures:

- All diesel-powered off-road equipment larger than 25 horsepower, operating on the site for more than two days, shall, at a minimum, meet U.S. EPA particulate matter emissions standards for Tier 4 engines that altogether achieve an 85 percent or greater reduction in particulate matter exhaust; alternatively (or in combination) use of Tier 3 off-road diesel equipment equipped with Level 3 verified diesel emission control systems or alternatively-fueled or electric equipment (i.e., non-diesel).
- Avoid diesel generator use by supplying line power to the construction site and limiting the use of diesel generators to no more than 100 total hours during the entire construction period.
- Avoid staging of construction equipment near portions of the site that are adjacent to residences.

Implementation of the standard measures prescribed for fugitive dust emissions would reduce exhaust emissions by five percent. Implementation of the above mitigation measure would reduce on-site diesel exhaust emissions by an additional 85 percent. This would reduce the cancer risk proportionally, such that the mitigated risk would be effectively controlled. 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)**

Non-CEQA Effects - Community Health Risk Impacts to the Project

As previously mentioned, per the California Building Industry Association v. Bay Area Air Quality Management District, 62 Cal. 4th 369 (BIA v. BAAQMD), effects of the environment on the project are not considered CEQA impacts.

¹⁴ Infants are especially susceptible to TACs due to their more rapid breathing rates compared to adults

The project would introduce new students (i.e., sensitive receptors) onto the project site. For assessing community risks and hazards, a 1,000-foot radius is recommended around the project property boundary. BAAQMD recommends that any proposed project that includes the siting of a new source or receptor assess associated impacts within 1,000 feet. However, the project site is not located within 1,000 feet of any existing TAC sources, such as freeways or highways, busy surface streets¹⁵, and stationary sources identified by BAAQMD, and therefore future students would not be exposed to elevated levels of TACs.

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

Construction activities for the proposed 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, the odors would be localized and temporary and are not likely to affect people off-site. Odors associated with the application of paints and coatings may also be noticeable on occasion by adjacent receptors. Painting and coating of new buildings would occur during daytime hours only, would be localized, and would be generally confined to the project site. These odors would also be temporary.

Odors are generally considered an annoyance rather than a health hazard. Land uses that have the potential to be sources of odors that generate complaints include, but are not limited to, wastewater treatment plants, landfills, composting operations, and food manufacturing facilities. Educational facilities, such as the proposed project, do not typically generate objectionable odors. **(Less than Significant Impact)**

¹⁵ BAAQMD defines significant traffic volume roadways as a freeway or arterial roadway with greater than 10,000 vehicles per day.

4.4 BIOLOGICAL RESOURCES

The following discussion is based in part on a Preliminary Arborist Report, dated July 3, 2019, prepared by *HortScience | Bartlett Consulting*. A copy of this report is included in Appendix A of this Initial Study.

4.4.1 Environmental Setting

4.4.1.1 *Regulatory Framework*

Federal and State

Endangered Species Act

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

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

Migratory Bird Treaty Act

The federal Migratory Bird Treaty Act (MBTA) prohibits killing, capture, possession, or trade of migratory birds except in accordance with regulations prescribed by the Secretary of the Interior. Hunting and poaching are also prohibited. The taking and killing of birds resulting from an activity is not prohibited by the MBTA when the underlying purpose of that activity is not to take birds.¹⁶ Nesting birds are considered special-status species and are protected by the USFWS. The CDFW also protects migratory and nesting birds under California Fish and Game Code Sections 3503, 3503.5, and 3800. The CDFW defines taking as causing abandonment and/or loss of reproductive efforts through disturbance.

Sensitive Habitat Regulations

Wetland and riparian habitats are considered sensitive habitats under CEQA. They are also afforded protection under applicable federal, state, and local regulations, and are generally subject to

¹⁶ United States Department of the Interior. “Memorandum M-37050. The Migratory Bird Treaty Act Does Not Prohibit Incidental Take.” Accessed March 28, 2019. <https://www.doi.gov/sites/doi.gov/files/uploads/m-37050.pdf>.

regulation by the United States Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), CDFW, and/or the USFWS under provisions of the federal Clean Water Act (e.g., Sections 303, 304, 404) and State of California Porter-Cologne Water Quality Control Act.

Fish and Game Code Section 1602

Streambeds and banks, as well as associated riparian habitat, are regulated by the CDFW per Section 1602 of the Fish and Game Code. Work within the bed or banks of a stream or the adjacent riparian habitat requires a Streambed Alteration Agreement from the CDFW.

Regional and Local

City of San Bruno General Plan

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

Policies	Description
OSR-34	Protect mature trees, as feasible, during new construction and redevelopment. Require identification of all trees over six inches in diameter and approval of landscaping plans during design review.
ERC-A	Preserve open space essential for the conservation of San Bruno's natural resources—including vegetation, wildlife, soils, water, and air.
ERC-B	Protect the natural environment, including wildlife, from destruction during new construction or redevelopment within San Bruno.
ERC-1	Preserve as open space those lands which are identified, through environmental review, as sensitive habitat areas. Require setbacks to development as buffer areas, as appropriate.
ERC-3	Protect natural vegetation in park, open space, and scenic areas as wildlife habitat, to prevent erosion, and to serve as noise and scenic buffers.
ERC-5	Preserve critical habitat areas and sensitive species within riparian corridors, hillsides, canyon areas, tree canopies, and wetlands that are within the City's control (Figure 6-1). Protect declining or vulnerable habitat areas from disturbance during design and construction of new development.
ERC-10	Require incorporation of native plants into landscape plans for new development as feasible—especially in areas adjacent to natural areas, such as canyons or scenic roadways (Figure 6-1). Require preservation of mature trees, as feasible, during design and construction.
ERC-11	Prohibit the use of any new non-native invasive plant species in any landscaped or natural area. Develop a program for abatement of non-native invasive species in open space or habitat areas.
ERC-13	Through environmental review, assure that all projects affecting resources of regional concern (e.g., the San Francisco garter snake habitat, water and air quality, the San Francisco Fish and Game Reserve) satisfy regional, State and federal laws.
ERC-16	Conduct presence/absence biological surveys for sensitive plant and animal species in natural areas prior to any construction activities proposed adjacent to or within identified natural areas (Figure 6-1). If no special status species are detected during these surveys, then construction-related activities may proceed. If listed special status species are found within the construction zone, then avoid these species and their habitat or consult with U.S. Fish and Wildlife Service and/or California Department of Fish and Game.
ERC-17	If construction activities, including tree removal activities, are required adjacent to or within natural areas (Figure 6-1), then avoid activities during March through June unless a bird survey is conducted to determine that the tree is unused during the breeding season by avian species that are protected under California Fish and Game Codes 3503, 3503.5, and 3511.

Policies	Description
T-33	Promote and facilitate planting of shade trees along all streets within San Bruno, through public education, developer incentives, and general beautification funds. Tree specifics should be selected to create a unified image and an effective canopy.

City of San Bruno Tree Preservation Policies

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

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

4.4.1.2 Existing Conditions

Natural Communities/Habitats

Although urbanization has removed much of the city’s original vegetation, San Bruno includes several distinct vegetative communities, including coyote brush scrub, freshwater wetland, willow riparian, mixed-oak woodland, eucalyptus woodland, mixed pine-oak-eucalyptus woodland, and non-native grassland.

The remaining land cover is classified as urban/highly disturbed. Areas in this category have been significantly altered and/or modified by human activity, and are typically residential, commercial, and industrial developments, roadways and roadcuts, quarry pits, buildings, and areas devoid of natural vegetation due to the spraying of herbicides or other direct human intervention.¹⁷

Per Figure 6-1 of the San Bruno General Plan, the subject site itself is classified as urban/highly disturbed, as a significant portion of the site is developed with impervious surfaces and buildings covering 65 percent of the parcel footprint. While the site contains no natural vegetative communities, there are 30 heritage trees on site including silver wattle acacia (*acacia dealbata*), blackwood acacia (*acacia melanoxylon*), blue gum (*eucalyptus globulus*), and mulberry (*morus sp.*) that have supplanted the original vegetation in addition to potential nesting bird habitats along the northwest border formed by the San Bruno City Park.

¹⁷ City of San Bruno. *San Bruno General Plan Draft EIR*. December 2008.

Special Status Species

Special status species in San Bruno include the California red-legged frog (*Rana aurora draytonii*, federally listed as threatened and a State species of special concern) and the San Francisco garter snake (*Thamnophis spiralis tetrataenia*, listed as endangered by both the State and federal governments). The U.S. Fish and Wildlife Service indicated that some areas east of Skyline College may provide suitable habitat for both species.¹⁸

Five special status plant species are known or have potential to occur in San Bruno, the Dudley's lousewort (*Pedicularis dudleyi*) and Hickman's cinquefoil (*Potentilla hickmanii*) which are protected under state and/or federal Endangered Species Acts. The remaining species, Choris's popcorn-flower (*Plagiobothrys chorisianus* var. *chorisianus*), Marsh horsetail (*Equisetum palustre*), and stink bells (*Fritillaria agrestis*) are federal species of local concern or California Native Plant Society List 3 (Plants about which more information is needed) or List 4 (Plants of limited distribution) species. These species require consideration under CEQA. Two sensitive plants have been reported at Lion's Field: Dudley's lousewort (*Pedicularia dudleyi*, a federally-listed species of concern and State rare species) and stink bell (*Fritillaria agrestis*, California Native Plant Society Category 4 species).

A number of raptor species could nest within the city. Some of these, like the Cooper's hawk (*Accipiter cooperii*, a State species of special concern), are specifically listed as sensitive, and all are protected by Fish and Game Code Section 3503.5. The large trees present in some areas of San Bruno also provide potential habitat for sensitive bat species, including the pallid bat (*Antrozous pallidus*, a State species of special concern).

According to the San Bruno General Plan, the project site does not contain any vegetative communities or special status species habitats capable of supporting special status species potentially present in the region.

Protected Trees

A tree survey conducted at the project site identified a total of 29 trees, all of which are protected heritage trees. Table 4.4-1 below summarizes the results of the tree assessment and details the species, tree and heritage tree count, condition, and suitability for preservation.

Table 4.4-1: Tree Assessment Summary					
Species		Tree Count	Heritage Tree Count	Condition	Suitability for Preservation
Scientific name	Common name				
<i>Acacia dealbata</i>	Silver wattle acacia	11	11	Poor to Fair	Low
<i>Acacia melanoxylon</i>	Blackwood acacia	16	16	Poor to Fair	Low
<i>Eucalyptus globulus</i>	Blue gum	1	1	Fair	Low
<i>Morus sp.</i>	Mulberry	1	1	Good	Moderate

¹⁸ City of San Bruno. *San Bruno General Plan*. March 2009.

4.4.2

Impact Discussion

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

According to the San Bruno General Plan, the project site does not contain any habitat suitable for special-status plant or wildlife species. Therefore, the project would not result in impacts to special-status species.

The proposed development does encompass trees which could be used by nesting birds. Nesting birds are protected under the MBTA and the California Fish and Game Code 3503, 3503.5, and 2800. Construction disturbance during the breeding season could result in the loss of fertile eggs, nesting raptors, or nest abandonment and would constitute a significant impact.

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

Impact BIO-1: Project implementation would impact nesting birds, including raptors and other migratory birds, if present during the time of construction.

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

MM BIO-1.1: To the extent feasible, initial grading and vegetation removal activities (or at least the commencement of such activities) should be scheduled to occur during the non-nesting season (September 1 to January 31). If construction activities are scheduled to take place outside of the nesting season, all impacts on nesting birds protected under the MBTA and CDFW will be avoided.

MM BIO-1.2: If it is not possible to schedule construction activities between September 1 and January 31, then pre-construction surveys shall be conducted by a qualified ornithologist to ensure that no nests will be disturbed during project implementation. These surveys shall be conducted no more than seven days prior to the initiation of construction activities or tree relocation or removal. During this survey, the ornithologist shall inspect all trees and other potential nesting habitats within 250 feet of the limits of construction activities. If an active nest is found sufficiently close to work areas to be disturbed by these activities, the ornithologist shall determine the extent of a construction-free buffer zone (typically 250 feet for raptors and 50 feet for other species), to ensure that nests of species protected by the MBTA and CDFW shall not be disturbed during project implementation. These buffers may be increased or decreased, as appropriate, depending on the bird species and the level of disturbance anticipated near the nest.

MM BIO-1.3: If construction activities will be scheduled during the nesting season (February 1 to August 31), all potential nesting substrates (e.g., bushes, trees, grasses, and other vegetation) that are planned to be removed by the project must be removed prior to February 1st, the start of the nesting season.

With implementation of the above measures, potential impacts from the project on nesting birds and protected raptors would be reduced to a less than significant level. **(Less than Significant with Mitigation Incorporated)**

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

As discussed in Impact BIO-1, there are no habitats on-site suitable for special-status species. The project site is heavily developed and surrounded by residential uses and the San Bruno City Park, which contains potential nesting bird habitat. Any nesting birds, including raptors and other migratory birds, present in the San Bruno City Park, would be protected by the mitigation measures outlined in Impact BIO-1. Given that there are no riparian habitats or other sensitive natural communities identified, project implementation would not substantially adversely affect any natural communities. **(Less than Significant 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 heavily developed and devoid of wetlands, marshes, or vernal pools. The project would not impact any state or 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. **(Less than Significant Impact)**

As the project site and surrounding area is heavily urbanized and not identified as an essential connectivity area, core reserve or corridor, landscape block, or general wildlife corridor, there is limited potential to serve as a corridor or nursery for resident or migratory wildlife outside of the birds discussed in Impact BIO-1. The absence of any waterways on-site precludes the potential to impact any resident or migratory fish species. **(Less than Significant 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)**

The proposed project intends to remove 28 of the 29 heritage trees on-site, all of which have a low suitability for preservation based on their disposition in relation to the proposed development according to the report by *HortScience | Bartlett Consulting*. As a condition of approval, the applicant will need to obtain a Heritage Tree Removal Permit. Landscaping plans include the planting of 43 replacement trees, which exceeds the City's reforestation requirements as outlined in San Bruno Municipal Code 8.25.050. The project conforms with San Bruno policies and ordinances protecting biological resources, and therefore conflicts with local regulations would be less than significant. **(Less than Significant Impact)**

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)**

The San Bruno Mountain Habitat Conservation Plan (HCP) is the closest region under a conservation plan. Since the project site is approximately 3.75 miles from the boundary of the San Bruno Mountain HCP, it is not subject to the provisions of the HCP and therefore there are no possible conflicts. **(No Impact)**

4.5 CULTURAL RESOURCES

4.5.1 Environmental Setting

4.5.1.1 *Regulatory Framework*

Federal and State

National Historic Preservation Act

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

California Register of Historical Resources

The California Register of Historical Resources (CRHR) is administered by the State Office of Historic Preservation and encourages protection of resources of architectural, historical, archeological, and cultural significance. The CRHR identifies historic resources for state and local planning purposes and affords protections under CEQA. Under Public Resources Code Section 5024.1(c), a resource may be eligible for listing in the CRHR if it meets any of the NRHP criteria.¹⁹

Historical resources eligible for listing in the CRHR must meet the significance criteria described previously and retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. A resource that has lost its historic character or appearance may still have sufficient integrity for the CRHR if it maintains the potential to yield significant scientific or historical information or specific data.

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

California Native American Historical, Cultural, and Sacred Sites Act

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

¹⁹ California Office of Historic Preservation. “CEQA Guidelines Section 15064.5(a)(3) and California Office of Historic Preservation Technical Assistance Series #6.” March 14, 2006.

Public Resources Code Sections 5097 and 5097.98

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

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

Regional and Local

City of San Bruno General Plan

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

Policies	Description
ERC-F	Preserve and enhance historic and cultural resources within the city, particularly within the historic Downtown area.
ERC-36	Preserve historic structures and resources during reuse and intensification within the city's older neighborhoods.
ERC-39	Continue to protect archaeological sites and resources from damage. Require that areas found to contain significant indigenous artifacts be examined by a qualified archaeologist for recommendations concerning protection and preservation.
ERC-45	If, prior to grading or construction activity, an area is determined to be sensitive for paleontological resources, retain a qualified paleontologist to recommend appropriate actions. Appropriate action may include avoidance, preservation in place, excavation, documentation, and/or data recovery, and shall always include preparation of a written report documenting the find and describing steps taken to evaluate and protect significant resources.

4.5.1.2 *Existing Conditions*

Archaeological Resources

The project site has been previously developed and is surrounded by existing developments. Since Native Americans at the time of Euro-American contact tended to live along the alluvial terraces and along historic Bay margins, potential exists for the discovery of Native American cultural resources within the City as the project is located in the San Francisco Bay Area, and is in the vicinity of the Crystal Springs Creek and San Andreas Reservoir.

Historic Resources

Based on the National Park Service's National Register of Historic Places and the California Office of Historic Preservation's California Register of Historical Resources and Historical Landmarks, there are no historical resources under CEQA Guidelines Section 15064.5 on or within the vicinity of the subject site. The majority of the school (administrative offices, cafeteria and kitchen, four classrooms, and library) were constructed in 1964. The remaining of the classrooms were added throughout the 1960s and 1970s.

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"/>
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)**

There are no historical resources present pursuant to CEQA Guidelines Section 15064.5, as the project site and existing buildings are not listed in the National Register of Historic Places, the California Register of Historical Resources, or the local registry of historic resources reflected in Figure 6-2 of the San Bruno General Plan. **(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)**

The project site has been previously disturbed and extensively developed with the former El Crystal Elementary School. As such, there is a low possibility for uncovering buried archaeological resources. Project-related grading and excavation during construction could however result in significant impacts, if any unknown culturally significant archaeological resources were discovered. **(Potentially Significant Impact)**

Impact CUL-2.1: Construction of the proposed project could result in significant impacts to unknown archaeological resources if present on-site.

Mitigation Measure: Implementation of the following mitigation measures would ensure that potential impacts to buried archaeological remain at a less than significant level.

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’s Planning Manager shall consult with the archaeologist to assess the significance of the find. Impacts to any significant resources shall be mitigated to a less-than-significant level through data recovery or other methods determined adequate by a qualified archaeologist and that are consistent with the Secretary of the Interior’s Standards for Archaeological documentation. Any identified cultural resources shall be recorded on the appropriate DPR 523 (A-J) form and filed with the NWIC.

MM CUL-2.2: *Worker Awareness Training.* Prior to the initiation of any site preparation and/or the start of construction, the project sponsor shall ensure that all construction workers receive training overseen by a qualified professional archaeologist who is experienced in teaching non-specialists, to ensure that contractors can recognize archaeological resources in the event that any are discovered during construction.

With the implementation of this mitigation measure, impacts to buried archaeological resources would be less than significant. **(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 culturally significant human remains would be a potentially significant impact. **(Potentially Significant Impact)**

Impact CUL-3.1: Construction of the proposed project could result in significant impacts to undiscovered human remains, if present on-site.

Mitigation Measure: Implementation of the following mitigation measures would ensure that potential impacts to undiscovered human remains is at a less than significant level.

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

By applying this measure, potentially significant impacts related to the destruction of human remains would be mitigated to a less than significant level. **(Less Than Significant with Mitigation Incorporated)**

4.6 ENERGY

4.6.1 Environmental Setting

4.6.1.1 *Regulatory Framework*

State

Renewables Portfolio Standard Program

In 2002, California established its Renewables Portfolio Standard Program, with the goal of increasing the percentage of renewable energy in the state's electricity mix to 20 percent of retail sales by 2010. 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 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.

California 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 2019 Title 24 updates went into effect on January 1, 2020.²⁰ Compliance with Title 24 is mandatory at the time new building permits are issued by city and county governments.²¹

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 into effect on January 1, 2020, and covers five categories: planning and design, energy efficiency, water efficiency and conservation, material and resource efficiency, and indoor environmental quality.

Advanced Clean Cars Program

CARB adopted the Advanced Clean Cars program in 2012 in coordination with the EPA and National Highway Traffic Safety Administration. The program combines the control of smog-causing pollutants and GHG emissions into a single coordinated set of requirements for vehicle

²⁰ California Building Standards Commission. "Welcome to the California Building Standards Commission." Accessed February 6, 2018. <http://www.bsc.ca.gov/>.

²¹ California Energy Commission (CEC). "2016 Building Energy Efficiency Standards." Accessed February 6, 2018. <http://www.energy.ca.gov/title24/2016standards/index.html>.

model years 2015 through 2025. The program promotes development of environmentally superior passenger cars and other vehicles, as well as saving the consumer money through fuel savings.²²

Regional and Local

City of San Bruno General Plan

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

Policies	Description
PFS-62	<p>Develop and implement a Green Building Design Ordinance and design guidelines for climate-oriented site planning, building design, and landscape design to promote energy efficiency. These standards may include, but are not limited to, the following:</p> <ul style="list-style-type: none"> • Require the use of Energy Star® appliances and equipment in new residential and commercial development, and new City facilities; • Require all new City facilities and new residential development to incorporate green building methods meeting the equivalent of LEED Certified “Silver” rating or better; and • Require all new residential development to be pre-wired for optional photovoltaic roof energy systems and/or solar water heating. <p>The Ordinance will allow variances to site or building requirements—building setbacks, lot coverage, and building height—that will enable use of alternative energy sources, such as passive heating and/or cooling.</p>
PFS-63	Require that all new development complies with California’s Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24, Part 6).
PFS-65	<p>Require new development to incorporate passive heating and natural lighting strategies if feasible and practical. These strategies should include, but are not limited to, the following:</p> <ul style="list-style-type: none"> • Using building orientation, mass and form, including façade, roof, and choice of building materials, color, type of glazing, and insulation to minimize heat loss during winter months and heat gain during the summer months; • Designing building openings to regulate internal climate and maximize natural lighting, while keeping glare to a minimum; and • Reducing heat-island effect of large concrete roofs and parking surfaces.
PFS-66	Enforce landscape requirements that facilitate efficient energy use or conservation, such as drought-resistant landscaping and/or deciduous trees along southern exposures.
PFS-70	<p>Facilitate environmentally sensitive construction practices by:</p> <ul style="list-style-type: none"> • Restricting use of chlorofluorocarbons (CFCs), hydrochlorofluorocarbons (HCFCs) and halons in mechanical equipment; • Promoting use of products that are durable and allow efficient end-of-life disposal (e.g. reusable, recyclable, biodegradable); • Promoting the purchase of locally or regionally available materials; and • Promoting the use of cost-effective design and construction strategies that reduce resource and environmental impacts.
PFS-71	Convert street lights and traffic signals to LED and other more efficient technologies as they become available.

²² California Air Resources Board. “The Advanced Clean Cars Program.” Accessed January 10, 2020. <https://www.arb.ca.gov/msprog/acc/acc.htm>.

4.6.1.2 *Existing Conditions*

Total energy usage in California was approximately 7,881 trillion British thermal units (Btu) in the year 2017, the most recent year for which this data was available.²³ Out of the 50 states, California is ranked second in total energy consumption and 48th in energy consumption per capita. The breakdown by sector was approximately 18 percent (1,416 trillion Btu) for residential uses, 19 percent (1,473 trillion Btu) for commercial uses, 23 percent (1,818 trillion Btu) for industrial uses, and 40 percent (3,175 trillion Btu) for transportation.²⁴ This energy is primarily supplied in the form of natural gas, petroleum, nuclear electric power, and hydroelectric power.

Electricity in San Mateo County in 2018 was consumed primarily by the commercial sector (64 percent), with the residential sector consuming 36 percent. In 2018, a total of approximately 4,226 GWh of electricity was consumed in San Mateo County.²⁵

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. Electrical power is provided to the City of San Bruno from eight different distribution feeders: four feeders are from the Sneath Lane substation in San Bruno, two feeders are from the East Grand substation in South San Francisco, one is fed from the Airport substation, and one originates from the Millbrae substation.²⁶ In 2015, the City of San Bruno's total residential and commercial electricity consumption amounted to 174,620,365 kilowatt hours (kWh), approximately 478,411 kWh per day. 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 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.²⁷

Natural Gas

PG&E provides natural gas services within San Bruno. In 2018, approximately one percent of California's natural gas supply came from in-state production, while the remaining supply was imported from other western states and Canada.²⁸ In 2018, residential and commercial customers in California used 34 percent of the state's natural gas, power plants used 35 percent, the industrial sector used 21 percent, and other uses used 10 percent. Transportation accounted for one percent of natural gas use in California. In 2018, San Mateo County used approximately 1.7 percent of the

²³ United States Energy Information Administration. "State Profile and Energy Estimates, 2017." Accessed August 1, 2019. <https://www.eia.gov/state/?sid=CA#tabs-2>.

²⁴ United States Energy Information Administration. "State Profile and Energy Estimates, 2017." Accessed August 1, 2019. <https://www.eia.gov/state/?sid=CA#tabs-2>.

²⁵ California Energy Commission. Energy Consumption Data Management System. "Electricity Consumption by County." Accessed March 15, 2019. <http://ecdms.energy.ca.gov/elecbycounty.aspx>.

²⁶ City of San Bruno. *San Bruno General Plan Draft EIR*. December 2008.

²⁷ 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/>.

²⁸ California Gas and Electric Utilities. 2019 *California Gas Report*. Accessed August 27, 2019. https://www.socalgas.com/regulatory/documents/cgr/2019_CGR_Supplement_7-1-19.pdf.

state's total consumption of natural gas.²⁹ Natural gas is provided to the City of San Bruno by PG&E from three gas lines stretching from Milpitas to San Francisco. San Bruno's natural gas consumption in 2015 amounted to 7,448,116 therms (thm), approximately 20,405 thm per day.³⁰

Fuel for Motor Vehicles

In 2017, 15 billion gallons of gasoline were sold in California.³¹ The average fuel economy for light-duty vehicles (autos, pickups, vans, and sport utility vehicles) in the United States has steadily increased from about 13.1 miles per gallon (mpg) in the mid-1970s to 24.9 mpg in 2018.³² 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.^{33,34}

Energy Use of Existing Development

The project site is occupied by the former El Crystal Elementary School, which was operational until June 2018. The estimated annual amounts of electricity and natural gas used by the former development on the site are shown in Table 4.6-1 for informational purposes, but are not considered the environmental baseline.

Table 4.6-2: Estimated Annual Energy Use of Former Development			
Development	Electricity Use (kWh)³⁵	Natural Gas Use (kBtu)³⁶	Gasoline (gal/yr)^{37,38}
El Crystal Elementary School ³⁹	13,100.22	48,595	2,880

²⁹ California Energy Commission. "Natural Gas Consumption by County." Accessed February 21, 2019. <http://ecdms.energy.ca.gov/gasbycounty.aspx>.

³⁰ City of San Bruno. *San Bruno General Plan Draft Environmental Impact Report*. December 2008.

³¹ 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.

³² United States Environmental Protection Agency. "The 2018 EPA Automotive Trends Report: Greenhouse Gas Emissions, Fuel Economy, and Technology since 1975." March 2019.

³³ United States Department of Energy. *Energy Independence & Security Act of 2007*. Accessed February 8, 2018. <http://www.afdc.energy.gov/laws/eisa>.

³⁴ 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>.

³⁵ California Emissions Estimator Model. *Stratford School*. February 18, 2020.

³⁶ Ibid.

³⁷ Gasoline use calculated based on forecasted annual VMT in CalEEMod (71,702) divided by average U.S. fuel economy.

³⁸ Per the 2018 EPA Automotive Trends Report, the average U.S. Fuel Economy is 24.9 miles per gallon.

³⁹ Energy use was calculated based on the square footage of the former school (18,602 square feet).

4.6.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
1) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Impact EN-1: The project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. (Less than Significant Impact)				

Development of the project site and the proposed building additions would consume energy during the construction and operational phases of the project. The construction phase would require energy for the actual manufacture and transportation of building materials, preparation of the site (e.g., importing fill and grading), and the actual construction of the building. Adherence to existing regulations and programs would reduce energy loss resulting from the disposal of construction and demolition materials through diversion and recycling.

Operation of the proposed Stratford School would consume energy for multiple purposes including, but not limited to, building heating and cooling, lighting, appliances, and electronics. Operational energy would also be consumed during each vehicle trip associated with the proposed uses. Increases in building floor area and in the number of students and employees would increase the demand for energy at the project site and in the City as a whole. Table 4.6-2 shows the estimated annual energy use of the proposed development.

Table 4.6-2: Estimated Annual Energy Use of Proposed Development			
Development	Electricity Use (kWh) ⁴⁰	Natural Gas Use (kBtu) ⁴¹	Gasoline (gal/yr) ^{42,43}
Stratford School - San Bruno City Park Campus ⁴⁴	15,540	57,645	3,416

⁴⁰ California Emissions Estimator Model (CalEEMod). *Stratford School*. February 18, 2020.

⁴¹ Ibid.

⁴² Gasoline use calculated based on forecasted annual VMT in CalEEMod (85,056) divided by average U.S. fuel economy.

⁴³ Per the 2018 EPA Automotive Trends Report, the average U.S. Fuel Economy is 24.9 miles per gallon.

⁴⁴ Energy use was calculated based on the square footage of the proposed school (22,065 square feet).

Implementation of the project would use approximately 15,540 kWh of electricity and approximately 57,645 kBtu of natural gas per year. Annual gasoline consumption as a result of the project would increase by approximately 3,416 gallons. Project-related energy usage is less than significant in comparison with state and county consumption of electricity, natural gas, and gasoline identified under Existing Conditions. Additionally, the proposed project would include the following green building features:

- Use of construction materials that are recycled and non-solvent that also reduce the release of volatile organic compounds (VOCs), and maximize the reflectance of light in flat roof areas;
- Energy Star certified mechanical units;
- Incorporation of existing solar panels into design;
- Exterior doors and windows with an insulated “low E” glazing supplemented with tinting to allow for greater insulation values;
- Efficient daylighting techniques to reduce air conditioning demands.

Although the project would use energy, the consumption would not be wasteful, inefficient, or unnecessary. The project would comply with the CALGreen Building Code and the City of San Bruno General Plan and Municipal Code. As noted above, 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 into effect on January 1, 2020, and covers five categories: planning and design, energy efficiency, water efficiency and conservation, material and resource efficiency, and indoor environmental quality.

By complying with the mandatory provisions of CALGreen that pertain to energy consumption and energy efficiency, and implementation of the proposed green building features, the project would not result in wasteful, inefficient, or unnecessary consumption or wasteful use of energy resources. **(Less than Significant Impact)**

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

As discussed above, although the project would use energy, the project would comply with the CALGreen Building Code, San Bruno General Plan, and San Bruno Municipal Code. The project is required to comply with these codes and policies, but many of the details are to be determined during the building permit process as the design and operation details of the residential building’s electrical, mechanical, and plumbing systems are further refined. Compliance with regulations would be verified at the time of Building Permit. As currently proposed, the project also includes multiple green-building measures. For these various reasons, the project would not conflict with a State or local plan for renewable energy or energy efficiency. **(Less than Significant Impact)**

4.7 GEOLOGY AND SOILS

4.7.1 Environmental Setting

4.7.1.1 *Regulatory Framework*

State

Alquist-Priolo Earthquake Fault Zoning Act

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

Seismic Hazards Mapping Act

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

California Building Standards Code

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

California Division of Occupational Safety and Health Regulations

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

Public Resources Code Section 5097.5

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

Regional and Local

City of San Bruno General Plan

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

Policies	Description
ERC-3	Protect natural vegetation in park, open space, and scenic areas as wildlife habitat, to prevent erosion, and to serve as noise and scenic buffers.
HS-B	Reduce the potential for damage from geologic hazards through appropriate site design and erosion control.
HS-C	Reduce the potential for damage from seismic hazards through geotechnical analysis, hazard abatement, emergency preparedness, and recovery planning.
HS-3	Require geotechnical investigation of all sites, except single-family dwellings, proposed for development in areas where geologic conditions or soil types are subject to landslide risk, slippage, erosion, liquefaction, or expansive soils. (Require submission of geotechnical investigation and demonstration that the project conforms to all recommended mitigation measures prior to City approval.
HS-4	Prevent soil erosion by retaining and replanting vegetation, and by siting development to minimize grading and land form alteration.
HS-7	Development in areas subject to seismic hazards, including ground shaking, liquefaction, and seismically-induced landslides (Figure 7-2) will comply with guidelines set forth in the most recent version of the California Division of Mines and Geology Special Publication 117
HS-8	Identify existing structural hazards related to un-reinforced masonry, poor or outdated construction techniques, and lack of seismic retrofit. Coordinate with the Redevelopment Agency to provide assistance to property owners to abate or remove structural hazards that create an unacceptable level of risk.

City of San Bruno Municipal Code

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

- An adequate description of the geology of the site;
- Conclusions and recommendations regarding the effect of geologic conditions on the proposed development;

- Opinions and recommendations covering the adequacy of sites to be developed by the proposed grading;
- Data regarding the nature, distribution, strength, and in place relative compaction of existing soils;
- Conclusions and recommendations for grading procedures and design criteria for corrective measures when necessary;
- Ground water conditions;
- Data on erodibility of the soil;
- Draft specifications for erosion control measures. For purposes of such draft specifications, reference is made to Association of Bay Area Governments Manual for Surface Runoff Control Measures, pages 1-45, through 1-151, inclusive. (Ord. 1369 § 1, 1981; prior code § 9-1.7(a))

4.7.1.2 *Existing Conditions*

Regional Geology

San Bruno is located within the Coast Ranges geomorphic province formed by the Franciscan, Merced, and Colma assemblages, which are principally composed of marine sedimentary and volcanic rocks, as well as deposits of sandstone, claystone, siltstone, gravel, sand, silt, and clay. The eastern portion of the City is former marginal tideland filled in with artificial fill material.

Seismicity and Seismic Hazards

As the San Francisco Bay Area contains numerous active and potentially active faults, there is a high potential for seismic events such as fault surface ruptures and ground shaking, which can cause ground failure (landslides), settlement, erosion, liquefaction, lateral spreading, and soil expansion.

San Bruno specifically straddles the San Andreas fault, one of the two major active strike-slip faults in the Bay Area, and is within the effective area of the Hayward, San Gregorio-Hosgri, Rodger's Creek-Healdsburg, Calaveras, Concord-Green Valley, Pilarcitos, and Serra faults as well. The faults in this region are capable of generating earthquakes of magnitude 7.0 or higher. During an earthquake, very strong ground shaking could occur at the project site.

The project site is not within an Alquist-Priolo Earthquake Fault Zone.⁴⁵ The nearest fault, the Serra, is approximately one half-mile west of the site. Since no known active faults intersect the property, fault rupture is not anticipated to occur at the site. According to Earthquake Zones of Required Investigation (EZRI) maps prepared by CGS, the project site is not mapped within a Landslide Zone but is within a Liquefaction Hazard zone. The project site is adjacent to areas with the potential for flooding and is developed on moderately expansive soils.⁴⁶ Soil liquefaction can be defined as ground failure or loss of strength that causes otherwise solid soil to take on the characteristics of a liquid. This phenomenon is triggered by earthquake or ground shaking that causes saturated or partially saturated soils to lose strength, potentially resulting in the soil's inability to support

⁴⁵ California Geological Survey. *California Earthquake Hazards Zone Application (EQ ZAPP)*. Date accessed February 19, 2020. <https://maps.conservation.ca.gov/cgs/EQZApp/app/>

⁴⁶ City of San Bruno. *General Plan*. March 2009.

structures. This can lead to lateral spreading, where flat-lying alluvial material is horizontally displaced toward an open area.

Soils

The project site is located on the Colma assemblage, which is weakly consolidated and is principally composed of gravel, sand, silt, and clay, moderately expansive soils. The northwest portion of the project site is abutted by deposit and bedrock outcrops forming the foundation of the San Bruno City Park.

Groundwater

Groundwater in the area ranges between 33 to 65 feet below ground surface (bgs) with an estimated northeast flow direction. Actual local groundwater flow direction can be influenced by factors such as local surface topography, underground structures, seasonal fluctuations, soil and bedrock geology, and production wells, none of which were considered during this study.⁴⁷

4.7.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
1) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
– Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault (refer to Division of Mines and Geology Special Publication 42)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
– Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
– Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
– Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input 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 the current California Building Code, creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

⁴⁷ The Vertex Companies, Inc. *El Crystal Elementary School Phase I Site Assessment*. February 2019.

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

Fault Rupture

The project site is not located within an Alquist-Priolo Earthquake Fault Zone, making fault rupture at the site not likely. While existing faults are located within one half mile of the site, the proposed project is outside of the fault rupture zone, and significant impacts from fault ruptures are not anticipated to occur.

Ground Shaking

The San Francisco Bay Area region contains both active and potentially active faults and is considered a region of high seismic activity. The 1997 Uniform Building Code locates the entire Bay Area within Seismic Risk Zone 4. Areas within Zone 4 are expected to experience maximum magnitudes and damage in the event of an earthquake. Earthquakes pose especially high risks to San Bruno because of the City's close proximity to active faults with relatively frequent past movements.

Additions to the existing buildings on-site would be subject to the standard engineering and building practices and techniques specified in the CBC, as well as the applicable Building and Fire Codes adopted by the City of San Bruno. Conformity with the aforementioned regulations would ensure less than significant impacts from seismically-induced ground shaking.

Ground Failure

Landslides

Both the San Bruno General Plan and the California Geological Survey indicate that the project site is not susceptible to landsliding. The site itself is outside the Landslide Hazard Zone. The project

would not exacerbate any existing landslide risks and there are no risks of landslides impacting the project. Therefore, the project is not susceptible to future landslides, on or off the site.

Liquefaction

The project site is located within an EZRI for Liquefaction due to its location on the Colma Assemblage, which is weakly consolidated and principally composed of moderately expansive soils.⁴⁸ The City of San Bruno's Municipal Code, Chapter 12.12 requires a grading permit for the proposed project. The grading permit requires that a soils and engineering geology report with design and construction recommendations be approved prior to City approval of the project. Therefore, the proposed project would not exacerbate existing geological hazards on the site such that it would impact (or worsen) off-site geological and soil conditions.

Lateral Spreading

Lateral spreading typically occurs as a form of horizontal displacement of relatively flat-lying soil toward an open or "free" face such as an open body of water, channel, or excavation. This movement is often associated with liquefaction and commonly occurs on gentle slopes in seismically active regions. Lateral spread presents a significant hazard to the integrity of buildings and other structures.

There are no adjacent bodies of water, channels, or excavations in the vicinity of the site that would increase the potential of lateral spread occurrence. It is not anticipated that lateral spread or other seismic-induced hazards would occur at the project site.

The project, in conformance to applicable regulations and with the implementation of the recommendations from a design-level geotechnical report, would not result in significant impacts from seismicity and seismic-related hazards including ground shaking, liquefaction, and lateral spreading. **(Less than Significant Impact)**

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

Ground disturbance related to demolition, excavation, grading, and construction activities from the proposed project is expected, potentially resulting in an increased exposure of soil to wind and water erosion. Development on the project site could result in significant amounts of soil erosion if managed improperly. In accordance with the City's Municipal Code, the project will be required to submit a soils and engineering geology report, which includes data on erodibility of the soil and draft specifications for erosion control measures conforming with the Association of Bay Area Governments Manual for Surface Runoff Control Measures.

In addition to the conditions described above, the proposed project would prepare a Storm Water Pollution Prevention Plan (SWPPP) which would formally document sediment and erosion control measures to be implemented during construction in compliance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Construction Activities. The project

⁴⁸ California Geological Survey. *California Earthquake Hazards Zone Application (EQ ZAPP)*. Date accessed February 19, 2020. <https://maps.conservation.ca.gov/cgs/EQZApp/app/>

would reduce post-construction soil erosion by managing stormwater runoff in compliance with the MRP. With adherence to the policies and regulations outlined in Section 4.10, Hydrology and Water Quality, the project would not substantially increase soil erosion on-site or contribute to the loss of topsoil. **(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)**

As discussed in Impact GEO-1, while the project site is located on the weakly consolidated Colma Formation which has moderately expansive soils, the geologic foundation of the project site is at a less than substantial risk of landslides, lateral spreading, or liquefaction. By conforming with the applicable regulations and the recommendations of the soils and engineering geology report, the project would not result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. **(Less than Significant Impact)**

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

As discussed in Impact GEO-1, the project site is located on the weakly consolidated Colma Formation which has moderately expansive soils. Expansive soils possess a “shrink-swell” characteristic. Shrink-swell is the cyclic change in volume (expansion and contraction) that occurs in fine-grained clay sediments from the process of wetting and drying. Structural damage may result over a long period of time, usually the result of inadequate soil and foundation engineering or the placement of structures directly on expansive soils. Although expansive soils can be a hazard, it is generally mitigated through adherence with the standard engineering and building practices and techniques specified in the CBC as well as the applicable elements of City building and fire codes. The City of San Bruno’s Municipal Code, Chapter 12.12 Soils and Engineering Geology Report, requires that a geotechnical investigation complete with design and construction recommendations be approved prior to City approval of the project.

Implementation of the conditions of approval identified previously under Impact GEO-1 would ensure significant impacts resulting from expansive soils are reduced to a less than significant level. **(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 site is located within an urbanized area of San Bruno where sewers are available to dispose of wastewater from the project site. The site would not need to support septic tanks or alternative wastewater disposal systems. **(No Impact)**

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

The project site has been previously disturbed and extensively developed with the former El Crystal Elementary School. As such, there is a low possibility for uncovering unique paleontological resources or geological features. Project-related grading and excavation during construction could however result in significant impacts, if any unknown unique geology and soil resources were discovered. **(Potentially Significant Impact)**

Impact GEO-6.1: Construction of the proposed project could result in significant impacts to unique paleontological resources and geological features if present on-site.

Mitigation Measure: Implementation of the following mitigation measures would ensure that potential impacts to buried paleontological resources or geological features remain at a less than significant level.

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 Manager 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 shall also be submitted to the City.

With the implementation of the above mitigation measure, impacts to unknown unique paleontological resources or geological features would be less than significant. **(Less Than Significant Impact with Mitigation Incorporated)**

4.8 GREENHOUSE GAS EMISSIONS

4.8.1 Environmental Setting

4.8.1.1 *Background Information*

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

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

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

4.8.1.2 *Regulatory Framework*

State

Assembly Bill 32

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).

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 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.

Other Implementing Laws and Regulations

There are a number of laws that have been adopted as a part of the State of California's efforts to reduce GHG emissions and their contribution to climate change. State laws and regulations related to growth, development, planning, and municipal operations in San Bruno include, but are not limited to:

- California Mandatory Commercial Recycling Law (AB 341)
- California Water Conservation in Landscaping Act of 2006 (AB 1881)

- California Water Conservation Act of 2009 (SBX7-7)
- Various Diesel-Fuel Vehicle Idling regulations in Chapter 13 of the California Code of Regulations
- Low Carbon Fuel Standards
- Building Energy Efficiency Standards (Title 24, Part 6)
- California Green Building Code (Title 24, Part 11)
- Appliance Energy Efficiency Standards (Title 20)

Post 2020-Impact Thresholds

As described previously, BAAQMD adopted GHG emissions thresholds of significance to assist in the review of projects under CEQA. These thresholds were designed to establish the level at which BAAQMD has determined that GHG emissions would cause significant environmental impacts. The GHG emissions thresholds identified by BAAQMD are 1,100 metric tons (MT) of CO₂e per year or 4.6 MT CO₂e per service population per year. A project that is in compliance with the City's Climate Action Plan (a qualified GHG Reduction Strategy) is considered to have a less than significant GHG impact regardless of its emissions.

The numeric thresholds set by BAAQMD were calculated to achieve the state's 2020 target for GHG emissions levels (and not the SB 32 specified target of 40 percent below the 1990 GHG emissions level). The project would occur over a period of eight months. The project would not be fully constructed and occupied until after December 31, 2020.

CARB has completed a Scoping Plan, which will be utilized by BAAQMD to establish the 2030 GHG efficiency threshold. BAAQMD has yet to publish a quantified GHG efficiency threshold for 2030. For the purposes of this analysis, a Substantial Progress efficiency metric of 2.6 MT CO₂e/year/service population has been calculated for 2030 based on the GHG reduction goals of SB 32 and Executive Order B-30-15, taking into account the 1990 inventory and the projected 2030 statewide population and employment levels.

City of San Bruno General Plan

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

Policies	Description
T-F	Provide efficient local transit—such as a shuttle system—to the BART and Caltrain stations to avoid dependence on individual motor vehicles.
ERC-13	Through environmental review, assure that all projects affecting resources of regional concern (e.g., the San Francisco garter snake habitat, water and air quality, the San Francisco Fish and Game Reserve) satisfy regional, State and federal laws.
ERC-25	Maintain and improve air quality by requiring project mitigation, such as Transportation Demand Management (TDM) techniques, where air quality impacts are unavoidable.
ERC-31	Prepare a Greenhouse Gas Emissions Reduction Plan, focusing on feasible actions the City can take to minimize the adverse impacts of Plan implementation on climate change and air quality. The Plan will include but will not be limited to:

Policies	Description
	<ul style="list-style-type: none"> An inventory of all known, or reasonably discoverable, sources of greenhouse gases (GHGs) that currently exist in the City and sources that existed in 1990. In determining what is a source of GHG emissions, the City may rely on the definition of “greenhouse gas emissions source” or “source” as defined in section 38505 of the California Global Warming Solutions Act (“AB 32”) or its governing regulations. The inventory may include estimates of emissions drawing on available information from State and regional air quality boards, supplemented by information obtained by the City. A projected inventory of the new GHGs that can reasonably be expected to be emitted in the year 2025 due to the City’s discretionary land use decisions pursuant to the 2025 General Plan Update, as well as new GHGs emitted by the City’s internal government operations. The projected inventories will include estimates, supported by substantial evidence, of future emissions from planned land use and information from state and regional air quality boards and agencies. A target for the reduction of those sources of future emissions reasonably attributable to the City’s discretionary land use decisions under the 2025 General Plan and the City’s internal government operations, and feasible GHG emission reduction measures whose purpose shall be to meet this reduction target by regulating those sources of GHG emissions reasonably attributable to the City’s discretionary land use decisions and the City’s internal government operations.
ERC-33	Require all large construction projects to mitigate diesel exhaust emissions through use of alternate fuels and control devices.

4.8.1.3 *Existing Conditions*

Unlike emissions of criteria and toxic air pollutants, which have regional and local impacts, emissions of GHGs have a broader, global impact. Global warming is a process whereby GHGs accumulating in the upper atmosphere contribute to an increase in the temperature of the earth and changes in weather patterns. As the Stratford School site is currently occupied by the vacated El Crystal Elementary School, there are no GHG emissions associated with the project site as the facilities are non-operational.

4.8.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
1) Generate greenhouse gas (GHG) emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input 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"/>

4.8.2.1 *Thresholds of Significance*

The BAAQMD’s CEQA Air Quality Guidelines prepared for the statewide AB 32 2020 target 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. Operation of the project would occur beyond 2020, so a threshold that addresses a future target is appropriate, based on the targets established in SB 32 to reduce statewide emissions 40% below 2020 levels by 2030.

Although BAAQMD has not published a quantified threshold for 2030 yet, this assessment uses a “Substantial Progress” efficiency metric of 2.6MT CO_{2e}/year/service population and a bright-line threshold of 660 MT CO_{2e}/year based on the GHG reduction goals of EO B-30-15. The service population metric of 2.6 is calculated for 2030 based predictions from BAAQMD. The 2030 bright-line threshold of 660 MT CO_{2e}/year is a 40 percent reduction of the 2020 1,100 MT CO_{2e}/year threshold.

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)**

Construction Emissions

Short-term GHG emissions from the construction phase of the Project would consist primarily of heavy equipment exhaust, worker travel, materials delivery, and solid waste disposal. Neither the City of San Bruno nor BAAQMD have an adopted threshold of significance for construction-related GHG emissions; however, BAAQMD recommends disclosing that GHG emissions would occur during construction. BAAQMD also encourages the incorporation of best management practices to reduce GHG emissions during construction where feasible and applicable. Because construction would be temporary (approximately eight months) and would not result in a permanent increase in emissions, the project would not interfere with the implementation of AB 32 or SB 32. **(Less than Significant Impact)**

Operational Emissions

If a proposed project involves the removal of existing emission sources, BAAQMD recommends subtracting the existing emissions levels from the emissions levels estimated for the new proposed land use, if the existing emissions sources were operational at the time the CEQA process was initiated.⁴⁹ As the former El Crystal Elementary School has been non-operational since June 2018, no baseline credit is assumed, and the emissions associated with the proposed development are considered 100 percent net new. Even with this assumption, the proposed 21,868 square feet of building floor area is below the screening threshold of 26,400 square feet of new construction⁵⁰, and therefore would not generate GHG emissions either directly or indirectly that would have a significant impact on the environment. **(Less than Significant Impact)**

⁴⁹ Bay Area Air Quality Management District. *California Environmental Quality Act Air Quality Guidelines*. May 2017.

⁵⁰ The BAAQMD operational GHG screening threshold before the passage of SB 32 requiring a 40 percent reduction in statewide GHG emissions for the 2020 target set by AB 32 was 44,000 square feet. Applying the 40 percent reduction to this threshold provides a corresponding operational GHG screening size of 26,400 square feet.

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 proposed project would not conflict or otherwise interfere with the statewide GHG reduction measures identified in CARB's Scoping Plan. For example, proposed buildings would be constructed in conformance with CALGreen and the Title 24 Building Code, which requires high-efficiency water fixtures and water-efficient irrigation systems. And as discussed in Impact GHG-1, the proposed construction is below the operational GHG screening threshold and therefore would not conflict with the BAAQMD Air Quality Guidelines. **(Less than Significant Impact)**

4.9 HAZARDS AND HAZARDOUS MATERIALS

The following discussion is based in part on a Phase I Environmental Site Assessment prepared by *The Vertex Companies, Inc.* A copy of this report, dated February 1, 2019 is included in Appendix B of this Initial Study.

4.9.1 Environmental Setting

4.9.1.1 *Regulatory Framework*

Overview

The storage, use, generation, transport, and disposal of hazardous materials and waste are highly regulated under federal and state laws. Federal regulations and policies related to development include the Comprehensive Environmental Response, Compensation, and Liability Act, commonly known as Superfund, and the Resource Conservation and Recovery Act. In California, the EPA has granted most enforcement authority over federal hazardous materials regulations to the California Environmental Protection Agency (CalEPA). In turn, local agencies have been granted responsibility for implementation and enforcement of many hazardous materials regulations under the Certified Unified Program Agency (CUPA) program.

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

Federal and State

Federal Aviation Regulations Part 77

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

Government Code Section 65962.5

Section 65962.5 of the Government Code requires CalEPA to develop and update a list of hazardous waste and substances sites, known as the Cortese List. The Cortese List is used by state and local agencies and developers to comply with CEQA requirements. The Cortese List includes hazardous

substance release sites identified by the Department of Toxic Substances Control (DTSC) and State Water Resources Control Board (SWRCB).⁵¹

California Accidental Release Prevention Program

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

Asbestos-Containing Materials

The Asbestos Hazard Emergency Response Act (AHERA) and its regulations require public school districts and non-profit schools, including charter schools, to inspect their schools for asbestos-containing building material and to prepare management plans and to take action to prevent or reduce the hazards presented by friable asbestos.⁵²

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

To prevent or reduce the hazards presented by friable asbestos, AHERA regulations require public school districts and non-profit schools to:

- Perform an original inspection to determine whether ACMs present and then re-inspecting in each school every three years;
- Develop, maintain, and update an asbestos management plan and keep a copy at the school;
- Provide yearly notification to parent, teacher, and employee organizations on the availability of the school's asbestos management plan and any asbestos-related actions taken or planned in the school;
- Designate a contact person to ensure the responsibilities of the public school district or the non-profit school are properly implemented;
- Perform periodic surveillance of known or suspected asbestos-containing building material;
- Ensure that trained and licensed professionals perform inspections and take response actions; and,
- Provide custodial staff with asbestos-awareness training

⁵¹ CalEPA. "Cortese List Data Resources." Accessed October 22, 2018. <https://calepa.ca.gov/sitecleanup/corteselist>.

⁵² United States Environmental Protection Agency. *Asbestos and School Buildings*. Date accessed January 31, 2019. <https://www.epa.gov/asbestos/asbestos-and-school-buildings>

Additionally, the Asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP) provides regulations for minimizing the release of asbestos fibers during building demolition or renovation, waste packaging, transportation and disposal. These work practices include:

- Performing a thorough inspection where the demolition or renovation will occur;
- Notifying the appropriate delegated entity (often a state agency) before any demolition, or before any renovations of buildings that contain a certain threshold amount of regulated ACMs;
- Removing all ACMs;
- Adequately wetting all ACM-containing materials; and,
- Sealing materials in leak tight containers and disposing as expediently as practicable

CCR Title 8, Section 1532.1

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

Regional and Local

Municipal Regional Permit Provision C.12.f

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

With the adoption of the San Francisco Bay Region Municipal Regional Stormwater National Pollutant Discharge Elimination System (NPDES) Permit (MRP) by the San Francisco Bay Regional Water Quality Control Board on November 19, 2015, Provision C.12.f requires that permittees develop an assessment protocol methodology for managing materials with PCBs in applicable structures planned for demolition to ensure PCBs do not enter municipal storm drain systems.⁵³ Municipalities throughout the Bay Area are currently modifying demolition permit processes and implementing PCB screening protocols to comply with Provision C.12.f. As of July 1, 2019, buildings constructed between 1955 and 1978 that are proposed for demolition must be screened for the presence of PCBs prior to the issuance of a demolition permit.

San Mateo County Comprehensive Airport Land Use Plan

San Bruno is within the jurisdiction of the San Francisco Airport (SFO) Land Use Plan component of the San Mateo County Comprehensive Airport Land Use Plan (San Mateo CLUP), adopted in

⁵³ California Regional Water Quality Control Board. *San Francisco Bay Region Municipal Regional Stormwater NPDES Permit*. November 2015.

December 1996 and updated in 2001. Established in the CLUP are procedures used by the San Mateo City and County Association of Governments (C/CAG) to review land use decisions in the vicinity of San Mateo County airports. Airport planning boundaries define where height, noise and safety standards, policies, and criteria are applied to certain proposed land use policy actions.

City of San Bruno General Plan

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

Policies	Description
HS-1	Regulate development, including remodeling or structural rehabilitation, to assure adequate mitigation of safety hazards on sites having a history or threat of slope instability, erosion, subsidence, seismic dangers (including those resulting from liquefactions, ground failure, ground rupture), flooding, and/or fire hazards.
HS-3	Ensure the health, safety, and welfare of San Bruno residents by requiring appropriate use, disposal, and transport of hazardous materials.
HS-24	Control the transport of hazardous substances to minimize potential hazards to the local population. Identify appropriate regional and local routes for transportation of hazardous materials, and require that fire and emergency personnel can easily access these routes for response to spill incidents.
HS-30	Regulate development on sites with known or suspected contamination of soil and/or groundwater to ensure that construction workers, the public, future occupants, and the environment are adequately protected from hazards associated with contamination, in accordance with federal, State, and local rules, regulations, policies, and guidelines.
PFS-30	Require installation and maintenance of fire protection measures in high-risk and urban-interface areas, including but not limited to: <ul style="list-style-type: none"> • Proper siting, road and building clearances, and access; • Brush clearance (non-fire resistant landscaping 50 feet from structures); • Use of fire resistive materials (pressure-impregnated, fire resistive shingles or shakes); • Landscaping with fire resistive species; and • Installation of early warning systems (alarms and sprinklers).
PFS-41	Create and maintain an up-to-date Emergency Operations Plan with information including but not limited to evacuation routes and procedures, chain of command communication structure, alerts and warning systems, emergency shelter provisions, and responsibilities and instructions for all relevant departments (police, fire, hazardous materials, emergency medical services, public works).

4.9.1.2 *Existing Conditions*

Historical Uses

The project site was formerly part of a much larger undeveloped parcel until 1946, when the majority of the main building (administrative offices, cafeteria and kitchen, four classrooms) and the library building forming the original El Crystal Elementary School was constructed. Six additional classrooms were added throughout the 1960s and 1970s.

On-Site Sources of Contamination

No environmental concerns or Recognized Environmental Concerns (RECs) were identified with respect to the site. A REC is defined as the presence of likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to release to the environment; (2) under

conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment.

Two Pacific Gas & Electric transformer units potentially containing PCBs with no visible staining or cracks were identified.⁵⁴ Surfaces potentially painted with lead-based paints (LBPs) were identified and in good condition with the exception of the surfaces along the outside eaves and exterior wall of the library entrance, which exhibited significant damage, peeling paint, and smoke damage. Suspect ACMs in good, non-friable condition were identified in the school building.⁵⁵

Off-Site Sources of Contamination

A review of databases and files from federal, state, and local environmental regulatory agencies was used to identify use, generation, storage, treatment, or disposal of hazardous substances and chemicals, or release incidents of such materials at surrounding facilities that may have impacted the subject site. Based on distance, regulatory status, and/or apparent groundwater gradient, *Vertex* determined these sites were not of environmental concern.

Airport Hazards

The project site is located within the San Francisco Airport (SFO) Land Use Plan Airport Influence Area B, which requires projects to be consistent with the goals and policies of the Airport Land Use Compatibility Plan (ALUCP). The proposed project site is approximately 0.8 mile from the runway termination point of San Francisco International Airport, beyond the outer boundary of safety compatibility zones and outside of the CNEL noise contours for the airport, as delineated in the CLUP.⁵⁶

Wildland Fire Hazards

The subject site is in a Local Responsibility Area (LRA) which has not been mapped by the Office of the State Fire Marshall or received a severity zone designation. The site is adjacent to the San Bruno City Park, which is designated in the San Bruno General Plan as a Wildland/Urban Interface Hazard Area as the Junipero Serra Park Wildland Fire Hazard Area is approximately 1,750 feet to the southwest.

⁵⁴ Hoexter Consulting Inc. *Phase I Environmental Site Assessment*. September 26, 2018.

⁵⁵ The Vertex Companies Inc. *Phase I Environmental Site Assessment*. February 1, 2019.

⁵⁶ City of San Bruno. *General Plan*. March 2009.

4.9.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
1) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input 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"/>
7) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

The proposed project does not involve the routine transport, use, or disposal of reportable quantities of hazardous materials besides gas and diesel fuel used by construction vehicles.

Small quantities of cleaning supplies, maintenance chemicals, and herbicides and pesticides for landscape maintenance would be stored and used in operation of the proposed project. No other hazardous materials would be used or stored on-site. These materials would be managed in accordance with existing laws and regulations that ensure that the routine transport, storage, use, and

disposal of these materials would not result in a significant hazard to the public or environment.
(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 with Mitigation Incorporated)**

As discussed under Existing Conditions, the most recent Phase I ESA conducted by *Vertex* revealed no RECs, including historical and controlled RECs, in connection with the site.

Based on the estimated age of the existing on-site buildings, ACM and lead-based paint may be present in some building materials. Building demolition could result in the release of these materials to the environment, if appropriate control measures are not implemented. Building demolition could result in the release of these materials to the environment, if appropriate control measures are not implemented. **(Potentially Significant Impact)**

Impact HAZ-2.1: Release of hazardous materials, specifically asbestos-containing materials and lead-based paint present on site could pose a risk to construction workers and nearby sensitive receptors during building demolition.

Mitigation Measures: The following mitigation measures would reduce impacts to construction workers from ACM and lead-based paint to less than significant level.

MM HAZ-2.1: To reduce the potential for construction workers and nearby sensitive receptors to encounter hazardous materials contamination from ACMs and lead-based paint, the following measures are included in the project.

- In conformance with local, state, and federal laws, an asbestos building survey and a lead-based paint survey shall be completed by a qualified professional to determine the presence of ACMs and/or lead-based paint on the structures proposed for demolition prior to issuance of a demolition permit for any site structure.
- A registered asbestos abatement contractor shall be retained to remove and dispose of all potentially friable asbestos-containing materials, in accordance with the NESHAP guidelines, prior to building demolition that may disturb the materials. All construction activities shall be undertaken in accordance with Cal/OSHA standards, contained in Title 8 of the California Code of Regulations (CCR), Section 1529, to protect workers from exposure to asbestos. Materials containing more than one percent asbestos are also subject to BAAQMD regulations.
- During demolition activities, all building materials containing lead-based paint shall be removed in accordance with Cal/OSHA Lead in Construction Standard, Title 8, CCR 1532.1, including employee

training, employee air monitoring and dust control. Any debris or soil containing lead-based paint or coatings shall be disposed of at landfills that meet acceptance criteria for the waste being disposed.

Implementation of the above mitigation measure would reduce the impact of released hazardous materials to a less than significant level. **(Less than Significant Impact with Mitigation Incorporated)**

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

There are three existing schools within one-quarter mile of the proposed development:

- St. Andrew's Preschool, approximately 750 feet from the subject site;
- St. Robert Catholic Elementary School, approximately 1,000 feet from the subject site; and
- Parkside Middle School, approximately 1,000 feet from the subject site.

As discussed under Impact HAZ-1, there is no significant hazard related to the transport, use, or disposal of hazardous materials. The emission of asbestos-containing materials and lead-based paint particles from building demolition would be controlled by the mitigation measures prescribed in Impact HAZ-2. Accordingly, the handling of hazardous materials and hazardous emissions associated with the proposed development would not impact nearby schools. **(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 site is not on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5. Thus, there would be no impact to the public or environment. **(Less than Significant Impact)**

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

The project is located within the San Francisco Airport (SFO) Land Use Plan Airport Influence Area B, which requires projects to be consistent with the goals and policies of the Airport Land Use Compatibility Plan (ALUCP). 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. As the project site is located on terrain that penetrates the airspace surface⁵⁷ (a surface rising 1-foot vertically for every 100 horizontal feet from the nearest point of the nearest runway within the boundary of the 14 CFR Part 77 Conical Surface), which requires that FAA Form 7460-1, Notice of Proposed Construction or Alteration, be filed with the FAA at least 30 days prior to construction so that the project can be reviewed for aviation compatibility, or a signed exemption form pursuant to 14 CFR Part 77.9(b) be submitted prior to construction.⁵⁸

As previously discussed, the project site is approximately 0.8 mile from the runway termination point of San Francisco International Airport, beyond the outer boundary of safety compatibility zones and outside of the CNEL noise contours for school uses. Therefore, future development of the site would not result in a safety hazard for people related to airport activities. **(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)**

Development of the proposed project would not physically interfere with an adopted emergency response or evacuation plan. During construction and operation of the proposed project, streets, roadways, and trails would not be permanently blocked such that emergency vehicles would be unable to access the site or surrounding sites. In accordance with standards set by the San Bruno Fire Department, access to the proposed development, including the proposed one-way drive aisle connecting Balboa Way and San Felipe Avenue, will:

- Be within 150 feet of all structures;
- Be at minimum 20 feet in width;
- Have a vertical clearance of 13 feet, six inches;
- Allow 150-degree radii coverage;
- Be fully paved; and,
- Be capable of supporting 34 tons in weight

Additionally, the project would be in compliance with all applicable Building and Fire Codes adopted by the City of San Bruno. In consideration of these design measures and compliance with safety and emergency regulations, the proposed development would not impair implementation or physically interfere with emergency plans. **(Less than Significant Impact)**

⁵⁷ Federal Aviation Administration. Notice Criteria Tool. Accessed April 3rd, 2020.

<https://oeaaa.faa.gov/oeaaa/external/gisTools/gisAction.jsp?action=showNoNoticeRequiredToolForm>

⁵⁸ City/County Association of Governments of San Mateo County. *Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport*. July 2012.

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

The project site is not located in an area designated as a wildland fire hazard. The project site is bordered to the northwest by San Bruno City Park, which is designated as an Wildland/Urban Interface Hazard Area for the Junipero Serra Park Wildland Fire Hazard Area (located approximately 1,750 feet to the southwest). Wildland/Urban Interface Hazard Areas are developed areas potentially at risk of damage should a wildland fire occur. In these areas, highly flammable vegetation mixed with steep topography and long, dry summers create potential for wildland fires. In contrast, the project site is relatively flat and devoid of highly flammable vegetation. Additionally, proposed landscaping would increase the distance between the trees along the site's northwest border and the buildings on-site, improving the buffer between the San Bruno City Park and the future Stratford School. In addition, the project would be in compliance with applicable building and fire codes adopted by San Bruno. For these reasons, the project would not expose people or structures, either directly or indirectly, to an increased significant risk of loss, injury, or death involving wildland fires.
(Less than Significant Impact)

4.10 HYDROLOGY AND WATER QUALITY

4.10.1 Environmental Setting

4.10.1.1 *Regulatory Framework*

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 EPA and the 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 and State

National Flood Insurance Program

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

Statewide Construction General Permit

The SWRCB has implemented an NPDES General Construction Permit for the State of California (Construction General Permit). For projects disturbing one acre or more of soil, a Notice of Intent (NOI) 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 and Local

San Francisco Bay Basin Plan

The San Francisco Bay RWQCB regulates water quality in accordance with the Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan). The Basin Plan lists the beneficial uses that the San Francisco Bay RWQCB has identified for local aquifers, streams, marshes, rivers, and the San Francisco Bay, as well as the water quality objectives and criteria that must be met to protect these uses. The San Francisco Bay RWQCB implements the Basin Plan by issuing and enforcing waste discharge requirements, including permits for nonpoint sources such as the urban runoff

discharged by a City's stormwater drainage system. The Basin Plan also describes watershed management programs and water quality attainment strategies.

Municipal Regional Permit Provision C.3.

The San Francisco Bay RWQCB re-issued the Municipal Regional Stormwater NPDES Permit (MRP) in 2015 to regulate stormwater discharges from municipalities and local agencies (co-permittees) in Alameda, Contra Costa, San Mateo, and Santa Clara Counties, and the cities of Fairfield, Suisun City, and Vallejo.⁵⁹ 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 new development and redevelopment projects that create or replace one acre or more of impervious surface to manage development-related increases in peak runoff flow, volume, and duration, where such hydromodification is likely to cause increased erosion, silt pollutant generation, or other impacts to local rivers, streams, and creeks. Projects may be deemed exempt from these requirements if they do not meet the minimized size threshold, drain into tidally influenced areas or directly into the Bay, or drain into hardened channels, or if they are infill projects in subwatersheds or catchment areas that are greater than or equal to 65 percent impervious.

Municipal Regional Permit Provision C.12.f

Provision C.12.f of the MRP requires co-permittee agencies to implement a control program for PCBs that reduces PCB loads by a specified amount during the term of the permit, thereby making substantial progress toward achieving the urban runoff PCBs wasteload allocation in the Basin Plan by March 2030.⁶⁰ Programs must include focused implementation of PCB control measures, such as source control, treatment control, and pollution prevention strategies. Municipalities throughout the Bay Area are updating their demolition permit processes to incorporate the management of PCBs in demolition building materials to ensure PCBs are not discharged to storm drains during demolition.

San Mateo Countywide Water Pollution Prevention Program

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

⁵⁹ MRP Number CAS612008

⁶⁰ San Francisco Bay Regional Water Quality Control Board. *Municipal Regional Stormwater Permit, Provision C.12*. November 19, 2015.

development, and municipal operations. The program also includes a target pollutant reduction strategy and monitoring program.

San Mateo County Flood Control District

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

City of San Bruno General Plan

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

Policies	Description
LUD-76	Assure that new development mitigates impacts on existing public services, including transit services, water, sewer, and storm drainage systems, police and fire protection, libraries, and parks and recreation facilities.
ERC-13	Through environmental review, assure that all projects affecting resources of regional concern (e.g., the San Francisco garter snake habitat, water and air quality, the San Francisco Fish and Game Reserve) satisfy regional, State and federal laws.
ERC-20	Require implementation of Best Management Practices to reduce accumulation of non-point source pollutants in the drainage system originating from streets, parking lots, residential areas, businesses, and industrial operations.
ERC-24	Require that new development incorporate features into site drainage plans that reduce impermeable surface area and surface runoff volumes. Such features may include: <ul style="list-style-type: none">• Additional landscaped areas including canopy trees and shrubs;• Reducing building footprint;• Removing curbs and gutters from streets and parking areas where appropriate to allow stormwater sheet flow into vegetated areas;• Permeable paving and parking area design;• Stormwater detention basins to facilitate infiltration; and• Building integrated or subsurface water retention facilities to capture rainwater for use in landscape irrigation and other non-potable uses.
HS-D	Protect sites subject to flooding hazards by implementing storm drainage improvements, and by requiring building design and engineering that meets or exceeds known flood risk requirements.
PFS-9	Upgrade the water distribution system as necessary to provide adequate water pressure to meet fire safety standards and to respond to emergency peak water supply needs.
PFS-13	Establish water conservation Best Management Practices (BMPs) and require them for new development and for municipal buildings and facilities.
PFS-21	Upgrade or replace sewer lines to accommodate anticipated flows and to prevent overflows. Upgrade sewer lift stations as needed.

City of San Bruno Urban Runoff Management Policies

Policies related to the management of urban runoff within the City are included in Title 10 of the San Bruno Municipal Code, Municipal Services, and Title 12, Land Use. Best Management Practices as

defined in Chapter 10.12, Water Quality Controls, which reduce the presence of pollutants in the stormwater are outlined in Chapter 10.18, Storm Water Management and Discharge Control.

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

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

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

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

City of San Bruno Storm Drain Master Plan

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

4.10.1.2 *Existing Conditions*

Hydrology and Drainage

San Bruno's Public Works Department Streets and Stormwater Division operates and maintains the storm drainage system in the City. The City of San Bruno contains six watersheds that drain the city. The city's primary drainage basins—Crystal Springs Creek, Huntington Creek, and San Bruno Creek—encompass 80 percent of San Bruno's land area. The subject site is within the Crystal Springs Creek drainage basin.

Currently, the project site is approximately 65 percent impervious and 35 percent pervious (85,366 square feet and 45,373 square feet, respectively). Existing storm drains on-site connect to a larger system of storm drains that collects and channels surface water (mostly from rainfall) into a series of pipes, trenches, culverts, detention basins, and open channels, managed by the San Mateo County Flood Control District, which transport and empty it into San Francisco Bay. The system is based upon the natural drainage pattern determined by topography. Because of the high relief (steep slopes) in the western third of San Bruno and the more gradual eastward slope east of I-280, a gravity-flow system is used. The Flood Control District operates two pump stations; one at Angus Avenue and one at Walnut Street. The discharge point for these watersheds is the San Bruno Channel, maintained by the Flood Control District, located next to the South San Francisco-San Bruno Water Quality Control Plant just north of SFO.

Groundwater

San Bruno is unique among cities on the San Francisco Peninsula because it uses a local water source to meet more than half of its needs. The city currently pumps water from four active groundwater supply wells, which produce approximately half of the city's water supply. These producing wells draw water from a deep aquifer—Westside Groundwater Basin—located between 250 feet and 500 feet below ground surface. The aquifer is capped by an impervious layer of clay, which acts as a barrier to any contaminants that might be at or near the surface. The wells are located in the eastern portion of the city.

The City of San Bruno uses approximately 4.2 million gallons of water per day (mgd). Per capita consumption averages approximately 75 gallons per day (gpd) in the wet season and 125 gpd in dry weather. In addition to the four wells, San Bruno's water system infrastructure consists of eight storage tanks, eight booster pump stations, 26 pressure regulating stations, 900 fire hydrants, 9,000 valves, over 120 miles of water mains ranging from 12 inches to 16 inches in diameter, and 11,300 metered services. According to the Public Works Department, San Bruno has adequate water storage capacity to meet current demands. Two projects in the Department's 10-Year Plan will increase storage capacity 25 to 30 percent, which will be adequate to accommodate future population growth. Based on potential buildout of the General Plan Land Use Diagram, San Bruno could add 1.7 million

square feet worth of non-residential building area by 2025. Assuming 75 gpd per capita during the wet season and 125 gpd per capita during the dry season, water demand in San Bruno could increase by 141,276 to 235,459 gpd by year 2025. This would bring the city's total 2025 demand to between 4.5–4.7 mgd of domestic water supply, an increase of seven to twelve percent over existing levels.

Groundwater in the area ranges between 33 to 65 feet below ground surface (bgs) with an estimated northeast flow direction. Actual local groundwater flow direction can be influenced by factors such as local surface topography, underground structures, seasonal fluctuations, soil and bedrock geology, and production wells.⁶¹

Flood Hazards

No areas designated by the Federal Emergency Management Agency (FEMA) as 500-year or 100-year floodplains exist within San Bruno. The City has identified several areas however which occasionally flood due to a combination of high tides and heavy rains, including the El Zanjón Creek Flood Zone, which encompasses San Bruno City Park and portions of Crystal Springs Road and is adjacent to the project area. El Zanjón Creek is approximately 400 feet from the site. The project site itself is not within the El Zanjón Creek Flood Zone, and per the Flood Insurance Rate Map (FIRM) prepared by FEMA, is within Zone X, an area of minimal flood hazard with less than a 0.2 percent annual chance of flooding.⁶²

Seiche and Tsunami Hazards

A seiche is defined as a standing wave generated by rapid displacement of water within an enclosed body of water (such as a reservoir, lake, or bay) due to an earthquake that triggers land movement within the water body or landsliding into or beneath the water body. The nearest enclosed body of water is San Andreas Lake, approximately 1.25 miles from the project site.

A tsunami is a large tidal wave caused by an underwater earthquake or volcanic eruption. Tsunamis affecting the Bay Area can result from off-shore earthquakes within the Bay Area. Tsunami inundation maps for San Mateo County show that the project site is not within a tsunami inundation area.⁶³

⁶¹ The Vertex Companies, Inc. *El Crystal Elementary School Phase I Site Assessment*. February 2019.

⁶² Federal Emergency Management Agency. *Flood Insurance Rate Map, Community Panel No. 06081C0154G*. Map. Effective Date: April 5, 2019. <https://msc.fema.gov/portal/home>

⁶³ California Geological Survey. *San Mateo County Tsunami Inundation Maps*. Accessed January 7, 2020. <https://www.conservation.ca.gov/cgs/tsunami/maps/san-mateo>

4.10.2 Impact Discussion

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

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

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

metals. In sufficient concentration, these pollutants have been found to adversely affect the aquatic habitats to which they drain.

Construction

Construction activities (e.g. grading and excavation) on the site may result in temporary impacts to surface water quality. When disturbance to underlying soils occurs, the surface runoff that flows across the site may contain sediments that are ultimately discharged into the storm drainage system. In total, the project would disturb 2.73 acres of land during construction, which is above the one-acre threshold requiring compliance with the State of California Construction General Permit.

The proposed project would be required to comply with the NPDES General Permit for Construction Activities due to the scale of soil disturbance. A NOI and SWPPP would be prepared by a qualified professional prior to commencement of construction. Additionally, the proposed project would be required to comply with Chapter 10.18 of the San Bruno Municipal Code, Storm Water Management and Discharge Control, thereby ensuring it complies with local and regional regulations regarding the reduction of pollutants in stormwater.

Impact HYD-1.1: Construction of the project may result in temporary impacts to surface water quality.

Mitigation Measures:

- MM HYD-1.1:** Construction best management practices (BMPs) shall be implemented for reducing the volume of runoff and pollution in runoff to the maximum extent practicable during site excavation, grading, and construction. These BMPs will include, but will not be limited to:
- Provision of filter materials at the catch basin to retain any debris and dirt flowing into the city's storm sewer system. City may establish controls on the volume and rate of storm water runoff from new developments and redevelopments as may be appropriate to minimize the discharge and transport of pollutants.
 - Vegetative control measures shall be in accordance with Association of Bay Area Governments Manual for Surface Runoff Control Measures.
 - Swales or ditches on terraces shall have a minimum gradient of three percent and shall be paved with reinforced concrete not less than three inches in thickness. They shall have a minimum paved width of five feet. A single run of swale or ditch shall not collect runoff from a tributary area exceeding fifteen thousand square feet (projected) without discharging into a down drain. Sediment basins may also be required by the city engineer to detain runoff and trap sediment during construction until slope erosion planting has been established
 - Where best management practices guidelines or requirements have been adopted by the city for any activity, operation, or facility which may cause or contribute to storm water pollution or

contamination, illicit discharges, and/or discharge of non-storm water to the storm water system, every person undertaking such activity or operation, or owning or operating such facility shall comply with such guidelines or requirements as may be identified by the director of public works.

The applicant shall pay fees associated with the administration of the storm water management and discharge control program. The amount of such fees shall be set from time to time by resolution of the City Council.

As no substantial excavation is proposed and groundwater depth in the area is relatively deep, dewatering of subsurface groundwater is not expected to occur. Should subsurface groundwater be encountered during construction requiring dewatering, the City may approve the discharge of groundwaters to the sanitary sewer only when such source is deemed unacceptable by state and federal authorities for discharge to surface waters of the United States, whether pretreated or untreated, and for which no reasonable alternative method of disposal is available. No discharge of such waters shall occur except as specifically authorized in a waste discharge permit or other written authorization.

Construction of the proposed project, with implementation of the above mitigation measures in accordance with the City's Municipal Code and General Plan policies, would not result in significant construction-related water quality impacts. **(Less than Significant Impact with Mitigation Incorporated)**

Post-Construction

The project proposes to demolish the existing secondary structures (totaling 2,909 square feet) and construct 3,280 square feet of new classrooms. This would result in a 371 square-foot net increase over existing conditions. The proposed development would add 10,400 square feet of impervious surfaces, increasing the impervious surface area from 64.8 percent to 72.8 percent for the project site. Pervious surfaces would consist of landscaping and two bioretention areas approximately 754 square feet in size, which would treat an additional 25,046 square feet of impervious surface. Implementation of the approved project would replace more than 10,000 square feet of impervious surface; therefore, the project is required to design and construct stormwater controls to treat post-construction stormwater runoff in accordance with provision C.3 of the MRP. The project would be required to comply with the RWQCB requirements for implementing construction best management practices to reduce the volume of runoff and pollution in runoff to the maximum extent feasible. By complying with the requirements of the MRP, the proposed project would have a less than significant impact on post-construction water quality. **(Less than Significant Impact)**

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

Groundwater in the area ranges between 33 to 65 feet below ground surface (bgs) with an estimated northeast flow direction. As discussed in Impact HYD-2, no substantial excavation would occur and groundwater depth in the area is relatively deep, so dewatering of subsurface groundwater is not expected to occur. The proposed project would not establish new groundwater sources or result in a substantial depletion of aquifers relied upon for local water supplies. For these reasons, the proposed project would not result in a significant groundwater impact. **(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)**

The project proposes to demolish the existing secondary structures (totaling 2,909 square feet) and construct 3,280 square feet of new classrooms. The project would replace and install 24,936 square feet of impervious surface on-site.

The proposed development would not substantially alter the existing drainage pattern of the site by adding impervious surfaces or altering the course of a waterway. The project would be required to manage erosion during construction in accordance with the City's Municipal Code (refer to Impact GEO-2) and Construction General Permit. Stormwater runoff from the project would be directed to two proposed bioretention areas on-site. The project's stormwater treatment system would reduce the rate of stormwater runoff entering the City's storm drainage system, thereby reducing the risk of potential flood events. The project would not create substantial new sources of polluted runoff upon adherence to the MRP and Construction General Permit. The project would, therefore, not substantially alter the drainage pattern of the site or area in a manner which would result in on or offsite erosion, flooding, or runoff impacts. **(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. **(Less than Significant Impact)**

As the project site is not located within a 100-year floodplain, and therefore not in a flood hazard zone, there is a less than substantial risk of pollutants being released due to project inundation. Due to the site's location and surrounding topography, the project site is not subject to seiche or tsunami hazards. **(Less than Significant 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)**

The project site is located in the Westside subbasin of the San Francisco Bay groundwater basin. The Westside subbasin has not been identified as medium- or high-priority groundwater basin by the California Department of Water Resources; therefore, a Groundwater Sustainability Plan does not need to be prepared for the subbasin per the requirements of the Sustainable Groundwater Management Act.⁶⁴ Thus, the proposed project would not conflict with a sustainable groundwater management plan.

As mentioned previously, 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. Compliance with the SMCWPPP, the MRP, the Construction General Permit, and the Conditions of Approval discussed in this section would ensure construction-period and post-construction water quality impacts do not occur. By adhering to these policies and regulations the proposed project would not prevent the RWQCB from attaining the water quality objectives set forth in the Basin Plan. **(Less than Significant Impact)**

⁶⁴ California Department of Water Resources. "Basin Prioritization". <https://water.ca.gov/Programs/Groundwater-Management/Basin-Prioritization>. Accessed October 7, 2019.

4.11 LAND USE AND PLANNING

4.11.1 Environmental Setting

4.11.1.1 *Regulatory Framework*

Local

City of San Bruno General Plan

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

Policies	Description
LUD-3	During Plan review, protect the residential character of established neighborhoods by ensuring that new development conforms to surrounding design and scale.
LUD-9	Provide safe and comfortable pedestrian routes through residential areas by requiring sidewalks on both sides of streets, planting street trees adjacent to the curb, allowing on-street parking, and minimizing curb cuts.
T-77	Create a pedestrian-oriented setting along the Pedestrian Emphasis Zones (see Figure 4-6) through potential construction of the following public improvements: <ul style="list-style-type: none">• Brick pavers to make sidewalks look more distinct;• Street trees to soften the environment and provide color and shade;• Human-scale street lights for enhanced aesthetics and illumination;• Banners and flags to make the area look more festive and cheerful; and• Benches to give people a place to sit, rest, and watch what goes on around them.
OSR-32	During plan review, assure that development on city lands is compatible with preservation of Crestmoor Canyon, Junipero Serra Park, San Francisco Peninsula Watershed lands, Golden Gate National Recreation Area, and San Francisco International Airport wetlands in a natural state.

4.11.1.2 *Existing Conditions*

The project site is occupied by the former El Crystal Elementary School, which consists of existing primary and secondary structures (totaling 21,569 square feet), paved outdoor play areas, three playgrounds, and three surface parking areas that were previously in operation as the El Crystal Elementary School until June 2018.

The project site has a General Plan land use designation of *Low-Density Residential* and is zoned *R-1, Single-Family Residential*. Residential parcels with *Low-Density Residential* land use designations zoned *R-1, Single-Family Residential* border the subject site to the north, east, and south. Parcels with *Low-Density Residential* land use designations permit single-family detached housing as well as religious facilities, large daycares, large senior care facilities, and similar uses such as schools. Schools are permitted on parcels zoned *R-1, Single-Family Residential* with a conditional use permit.

The San Bruno City Park adjacent to the site's northwest border has a *Parks/Open Space* land use designation and is zoned for *Open Space* use. Lands designated as *Parks/Open Space* are intended to provide parks, recreation facilities, and open space areas for the general community. The San Bruno Municipal Code specifically lists schools as a compatible use with lands zoned for *Open Space* use.⁶⁵

⁶⁵ City of San Bruno Municipal Code Sections 12.84.080, 12.96.060, 12.96.170.

4.11.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
1) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input 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 proposes to demolish the existing secondary structures (totaling 2,909 square feet) and construct 3,280 square feet of new classrooms at the site of the former El Crystal Elementary School. The school was operational until June 2018. The proposed project would result in a 371 square-foot net increase over existing conditions. The project does not propose dividing infrastructure such as highways, freeways, or major arterials that could inhibit the access of residents to the surrounding areas. The project would not physically divide an established community within the City because it would not interfere with or modify the movement of residents throughout nearby neighborhoods. **(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)**

Land Use Compatibility

Potential incompatibility may arise from placing a particular development or land use at an inappropriate location, or from some aspect of the project's design or scope. Depending on the nature of the impacts and its severity, land use compatibility conflicts can range from minor irritation and nuisance to potentially significant effects on human health and safety.

Demolition and construction activities under the proposed project could temporarily impact nearby residential uses (Refer to Section 4.13, Noise and Vibration and Section 4.3 Air Quality of this Initial Study). The proposed project would include measures that would reduce potential impacts from these activities to a less than significant level. After construction activities cease, the proposed private school would be compatible with the nearby residential uses and would not result in significant environmental impacts from its operation.

As previously noted, the project involves remodeling of the former El Crystal Elementary School to facilitate operation of a private preschool and kindergarten. The proposed use of the project site, as a preschool and kindergarten would be consistent with past uses at the site and would not substantially conflict with surrounding land uses. Therefore, the proposed project would not result in a significant land use impact due to incompatibility with surrounding land uses. **(Less Than Significant Impact)**

Consistency with Plans

Land use and planning policies and regulations adopted for the purpose of avoiding or mitigating adverse environmental effects include land use and zoning designations outlined in the San Bruno Municipal Code. The project site has a General Plan land use designation of *Low-Density Residential* and is zoned *R-1, Single-Family Residential*, which, with a Conditional Use Permit, is compatible with school uses. Schools are specifically listed as a use compatible with areas zoned as *Parks/Open Space*. **(Less than Significant Impact)**

4.12 MINERAL RESOURCES

4.12.1 Environmental Setting

4.12.1.1 *Regulatory Framework*

State

Surface Mining and Reclamation Act

The Surface Mining and Reclamation Act (SMARA) was enacted by the California legislature in 1975 to address the need for a continuing supply of mineral resources, and to prevent or minimize the negative impacts of surface mining to public health, property, and the environment. As mandated under SMARA, the State Geologist has designated mineral land classifications in order to help identify and protect mineral resources in areas within the state subject to urban expansion or other irreversible land uses which would preclude mineral extraction. SMARA also allowed the State Mining and Geology Board (SMGB), after receiving classification information from the State Geologist, to designate lands containing mineral deposits of regional or statewide significance.

California Geological Survey

As mandated by SMARA, the California Geological Survey (CGS) has classified lands within the San Francisco-Monterey Bay region into Mineral Resource Zones (MRZs) based on the California State Mining and Geology Board guidelines. Areas with an MRZ-1 designation have sufficient information available indicating that there is little to no likelihood of significant mineral deposits. MRZ-2 areas are those where adequate information indicates that significant deposits are present. Areas classified as MRZ-3 contain mineral deposits, but their significance cannot be evaluated from available data. Areas are classified as MRZ-4 where available information is inadequate for assignment to any other MRZ category.⁶⁶

4.12.1.2 *Existing Conditions*

According to the San Bruno General Plan EIR, the City of San Bruno west of Highway 101 and east of Interstate 280 is classified as MRZ-1.

⁶⁶ City of San Bruno. *San Bruno General Plan Draft EIR*. December 2008.

4.12.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<hr/>				
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 checked="" type="checkbox"/>	<input 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"/>
<hr/>				
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)			
<hr/>				
Impact MIN-2:	The project would not 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. (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.

As the project site is located in the San Bruno region west of Highway 101 and east of Interstate 280, the site is classified as MRZ-1, indicating that there is little to no likelihood of significant mineral deposits. Therefore, the proposed project would not result in the loss of availability of a known mineral resource that would be of value to the residents in the state or region. **(No Impact)**

4.13 NOISE

The following discussion is based in part on a Noise and Vibration Assessment prepared by *Illingworth & Rodkin, Inc.* A copy of this report, dated March 27, 2020, is included in Appendix C of this Initial Study.

4.13.1 Environmental Setting

4.13.1.1 *Background Information*

Noise

Factors that influence sound as it is perceived by the human ear, include the actual level of sound, period of exposure, frequencies involved, and fluctuation in the noise level during exposure. Noise is measured on a decibel scale, which serves as an index of loudness. The zero on the decibel scale is based on the lowest sound level that the healthy, unimpaired human ear can detect. Each 10 decibel increase in sound level is perceived as approximately a doubling of loudness. Because the human ear cannot hear all pitches or frequencies, sound levels are frequently adjusted or weighted to correspond to human hearing. This adjusted unit is known as the A-weighted decibel, or dBA.

Since excessive noise levels can adversely affect human activities and human health, federal, state, and local governmental agencies have set forth criteria or planning goals to minimize or avoid these effects. Noise guidelines are generally expressed using one of several noise averaging methods, including L_{eq} , DNL, or CNEL.⁶⁷ 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.

⁶⁷ L_{eq} is a measurement of average energy level intensity of noise over a given period of time. Day-Night Level (DNL) is a 24-hour average of noise levels, with a 10 dB penalty applied to noise occurring between 10:00 PM and 7:00 AM. Community Noise Equivalent Level (CNEL) includes an additional five dB applied to noise occurring between 7:00 PM and 10:00 PM. Where traffic noise predominates, the CNEL and DNL are typically within two dBA of the peak-hour L_{eq} .

4.13.1.2 *Regulatory Framework*

Federal

Federal Transit Administration Vibration Limits

The Federal Transit Administration (FTA) has developed vibration impact assessment criteria for evaluating vibration impacts associated with transit projects. The FTA has proposed vibration impact criteria based on maximum overall levels for a single event. The impact criteria for groundborne vibration are shown in Table 4.13-1 below. There are established criteria for frequent events (more 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 4.13-1: Groundborne Vibration Impact Criteria			
Land Use Category	Groundborne Vibration Impact Levels (VdB inch/sec)		
	Frequent Event	Occasional Events	Infrequent Events
Category 1: Buildings where vibration would interfere with interior operations	65	65	65
Category 2: Residences and buildings where people normally sleep	72	75	80
Category 3: Institutional land uses with primarily daytime use	75	78	83
Source: Federal Transit Administration. <i>Transit Noise and Vibration Assessment Manual</i> . September 2018.			

State

California Green Building Standards Code

The State of California established exterior sound transmission control standards for new non-residential buildings as set forth in the 2016 California Green Building Standards Code (Section 5.507.4.1 and 5.507.4.2). The sections that pertain to this project are as follows:

5.507.4.1 Exterior noise transmission, prescriptive method. Wall and roof-ceiling assemblies exposed to the noise source making up the building envelope shall meet a composite STC rating of at least 50 or a composite OITC rating of no less than 40, with exterior windows of a minimum STC of 40 or OITC of 30 when the building falls within the 65 dBA DNL noise contour of a freeway or expressway, railroad, industrial source or fixed-guideway noise source, as determined by the local general plan noise element.

5.507.4.2 Performance method. For buildings located, as defined by Section 5.507.4.1, wall and roof-ceiling assemblies exposed to the noise source making up the building envelope shall be constructed to provide an interior noise environment attributable to exterior sources that does not

exceed an hourly equivalent noise level ($L_{eq}(1-hr)$) of 50 dBA in occupied areas during any hour of operation.

The performance method, which establishes the acceptable interior noise level, is the method typically used when applying these standards.

The California Collaborative for High-Performance Schools Best Practices Manual, 2014 Edition, establishes standards for background noise levels due to exterior noise sources. Sections EQ14.0 and EQ 14.1 of the CA-CHPS Manual state that the A-weighted background noise levels produced by exterior sound sources shall be no more than 45 dBA L_{eq} . A maximum level of 35 dBA L_{eq} is recommended for enhanced learning environments.

Local

City of San Bruno General Plan

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

Policies	Description
T-G	Protect residential areas from congestion and associated noise resulting from BART and Caltrain spillover traffic.
ERC-3	Protect natural vegetation in park, open space, and scenic areas as wildlife habitat, to prevent erosion, and to serve as noise and scenic buffers.
HS-F	Protect the health and comfort of residents by reducing the impact of noise from automotive vehicles, San Francisco International Airport, railroad lines, and stationary sources.
HS-G	Ensure that all development heeds safety pre-cautions from the San Francisco International Airport.
HS-32	Encourage developers to mitigate ambient noise levels adjacent to major noise sources by incorporating acoustical site planning into their projects. Utilize the City's Building Code to implement mitigation measures, such as: <ul style="list-style-type: none">• Incorporating buffers and/or landscaped berms along high-noise roadways and railways;• Incorporating traffic calming measures and alternative intersection design within and/or adjacent to the project;• Using reduced-noise pavement (rubberized asphalt); and• Incorporating state-of-the-art structural sound attenuation measures.
HS-33	Prevent the placement of new noise sensitive uses unless adequate mitigation is provided. Establish insulation requirements as mitigation measures for all development, per the standards in Table 7-1.
HS-34	Discourage noise sensitive uses such as hospitals, schools, and rest homes from locating in areas with high noise levels. Conversely, discourage new uses likely to produce high levels of noise from locating in areas where noise sensitive uses would be impacted.
HS-35	Require developers to comply with relevant noise insulation standards contained in Title 24 of the California Code of Regulations (Part 2, Appendix Chapter 12A).
HS-36	Encourage developers of new residential projects to provide noise buffers other than sound walls, such as vegetation, storage areas, or parking, as well as site planning and locating bedrooms away from noise sources.
HS-38	Require developers to mitigate noise exposure to sensitive receptors from construction activities. Mitigation may include a combination of techniques that reduce noise generated at the source, increase the noise insulation at the receptor, or increase the noise attenuation rate as noise travels from the source to the receptor.

Policies	Description
HS-45	Where feasible and appropriate, develop and implement noise reduction measures when undertaking improvements, extensions, or design changes to San Bruno streets.

City of San Bruno Municipal Code

Regulations pertaining to permitted noise levels and operational hours associated with construction as well as acceptable noise levels from stationary sources are provided in the San Bruno Municipal Code. Relevant portions of the Municipal Code regarding noise and hours of operation include:

- **Title 6 “Public Peace, Morals, and Welfare”, Chapter 6.16 “Noise Regulations”**

Ambient noise levels in residential zones are limited to forty-five decibels from ten p.m. to seven a.m. and sixty decibels from seven a.m. to ten p.m. Noise levels exceeding the ambient base level by more than ten decibels is a violation, except during the period seven a.m. to ten p.m. where the ambient base level may be exceeded by twenty decibels for a period not to exceed thirty minutes during any twenty-four-hour period. Construction noise levels are not permitted to exceed eighty-five decibels as measured at one hundred feet, or exceed between the hours of ten p.m. and seven a.m. a noise level of sixty decibels as measured at one hundred feet without a permit from the director of public works.

- **Title 9 “Parks and Recreation”, Chapter 9.20 “Use Regulations”**

Noise sources associated with demolition, construction, maintenance and/or repair upon a park, open space or recreation area property, building or other structure are exempt from noise regulations pertaining to disturbing the peace or quiet of any park, open space, or recreation area.

- **Title 12 “Land Use”, Article I. “Excavation and Grading”, Chapter 12.16 “Grading Regulations”**

All grading and noise therefrom, including but not limited to, warming of equipment motors in residential zones, or within one thousand feet of any residential occupancy, hotel, motel, or hospital shall be limited to those hours between seven a.m. and five-thirty p.m. on weekdays, unless other hours are approved by the city engineer based upon evidence that an emergency exists which would constitute a hazard to persons or property if grading at other times is not permitted.

4.13.1.3 *Existing Conditions*

The project site is located in a developed residential area approximately 1,300 feet southwest of State Route 82 (El Camino Real or SR82). Single family homes border the site to the east, south, and west. San Bruno City Park borders the site to the north. The primary noise sources at the site are traffic along local roadways, distant traffic from major roadways including Interstate 280 (I-280), El Camino Real (SR82), and U.S. Route 101 (US 101), and occasional jet flyovers from San Francisco International Airport. The site is currently vacant and is not generating any substantial noise.

Existing Noise Levels

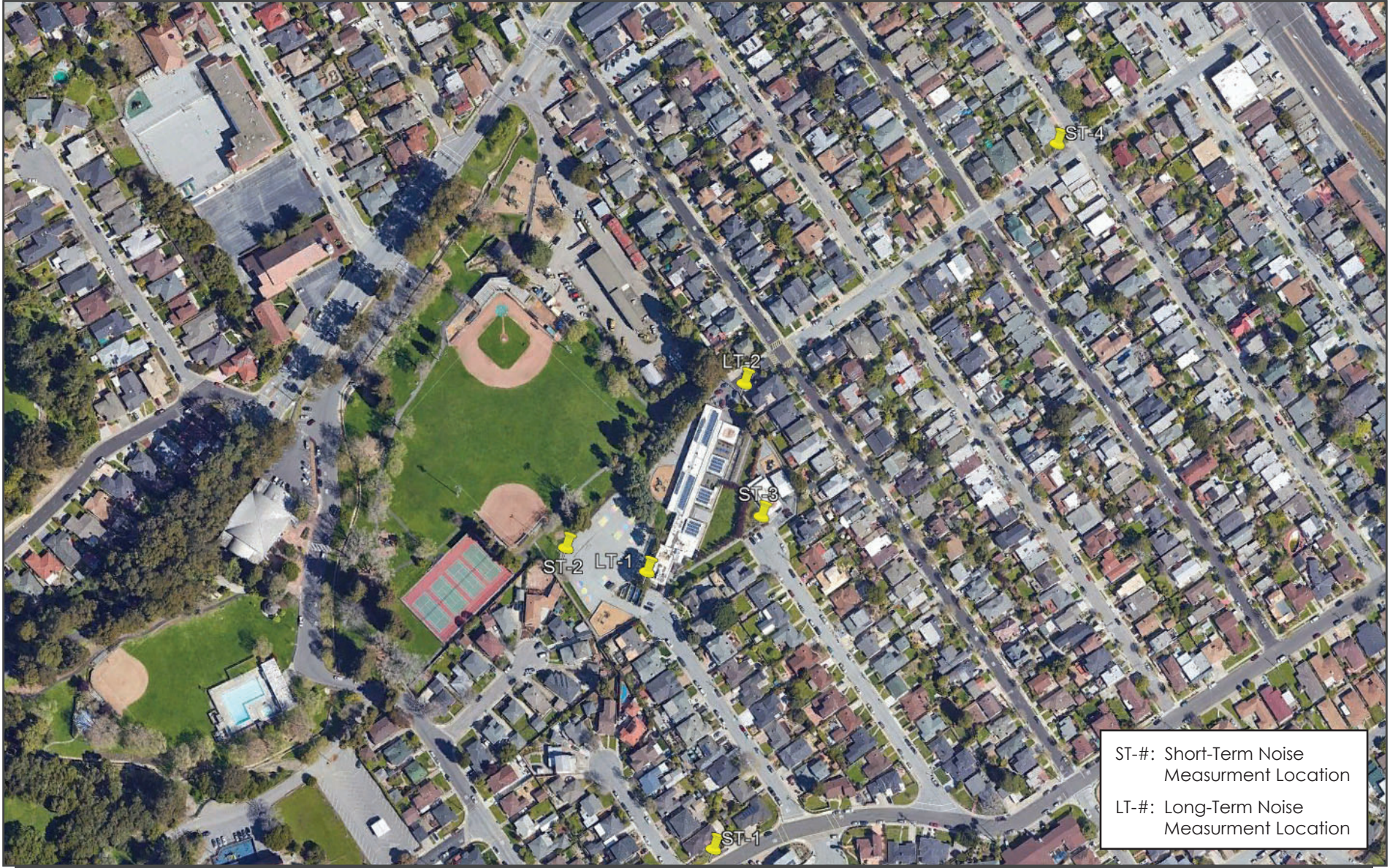
Existing noise levels were quantified by two long-term noise measurements (LT-1 and LT-2) that recorded noise levels between Thursday, February 13, 2020 and Tuesday, February 18, 2020 and four short-term, 10-minute, attended noise measurements.⁶⁸ These measurements predate the March 16, 2020 San Mateo County Shelter in Place Order and reflect normal conditions with typical traffic levels and noise conditions. The measurement locations are shown in Figure 4.13-1.

Locations ST-1 and ST-4 were selected to quantify noise levels in the residential areas to the south and northeast of the project site, both of which experienced an average noise level of 55 dBA L_{eq} . ST-2 was made at the southwest corner of the site, at the end of the parking lot near San Bruno City Park and recorded an average noise level of 55 dBA L_{eq} . ST-3 was made at the eastern property line of the site, adjacent to the existing parking spots at the end of Anza Way and recorded a slightly lower average noise level measured at 53 dBA L_{eq} . The primary noise source at this location was traffic along I-280, with jet flyovers acting as a secondary source. Jet flyovers generated maximum noise levels in the range of 60 to 66 dBA L_{max} .

LT-1 was located at the south end of the site, approximately 10 feet from the southwestern corner of the existing building. This location was adjacent to ST-2 and was selected to characterize ambient noise levels at the site originating from local activities, local traffic, and distant traffic along I-280. Daytime hourly-average noise levels at LT-1 ranged between 51 to 59 dBA. Nighttime hourly-average noise levels at LT-1 ranged between 38 to 57 dBA. LT-2 was located at the north end of the site approximately 45 feet from the existing building and was selected to characterize ambient noise levels at the site originating from local activities, local traffic, and distant traffic along SR 85 and US 101. Daytime hourly-average noise levels at LT-2 ranged between 50 to 61 dBA. Nighttime hourly-average noise levels at LT-2 ranged between 40 to 55 dBA.

Short- and long-term noise measurement summaries are provided in Table 4.13-2 and Table 4.13-3, respectively.

⁶⁸ Short-term noise measurements were conducted on Thursday, February 13, 2020 in ten-minute intervals between 10:40 a.m. and 1:00 p.m.



NOISE MEASUREMENT LOCATIONS

FIGURE 4.13-1

Table 4.13-2: Summary of Short-Term Noise Measurements (dBA)							
Noise Measurement Location	L_{max}	L₍₁₎	L₍₁₀₎	L₍₅₀₎	L₍₉₀₎	L_{eq(10)}	DNL¹
ST-1: Along Santa Lucia Avenue (2/13/2020 10:40-10:50 a.m.)	72	66	55	52	50	55	59
ST-2: Southwest Corner of Site (2/13/2020 11:20-11:30 a.m.)	69	65	56	51	59	55	59
ST-3: Parking Spots near Anza Way (2/13/2020 12:10-12:20 p.m.)	66	64	55	49	48	53	57
ST-4: Along San Felipe Avenue (2/13/2020 12:30-12:40 p.m.)	69	68	57	48	44	55	57
¹ DNL values are determined by correlating short-term measurements with long-term measurements.							

Table 4.13-3: Summary of Long-Term Noise Measurements (dBA)				
Location	Date	Hourly-Average Noise Level, L_{eq}		DNL
		Daytime	Nighttime	
LT-1, Southern portion of site near southwestern corner of existing building	Thursday ¹ , 02/13/2020	52 – 57	50 – 52	–
	Friday, 02/14/2020	52 – 57	40 – 55	58
	Saturday, 02/15/2020	52 – 58	45 – 55	59
	Sunday, 02/16/2020	52 – 61	48 – 54	60
	Monday, 02/17/2020	53 – 59	45 – 55	60
	Tuesday ¹ , 02/18/2020	50 – 54	43 – 53	–
LT-2, Northern portion of site near San Felipe Avenue	Thursday ¹ , 02/13/2020	52 – 58	52 – 55	–
	Friday, 02/14/2020	54 – 58	38 – 57	59
	Saturday, 02/15/2020	53 – 59	47 – 56	60
	Sunday, 02/16/2020	52 – 59	46 – 56	60
	Monday, 02/17/2020	53 – 58	48 – 57	61
	Tuesday ¹ , 02/18/2020	51 – 58	43 – 53	–
¹ Measurements taken on Thursday, February 13, 2020 and Tuesday, February 18, 2020 were not 24 hours in duration and therefore cannot be used to determine a 24-hour average level.				

4.13.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in:				
1) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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)**

Construction Noise

The San Bruno General Plan and Municipal Code requires developers to mitigate noise exposure to sensitive receptors from construction activities. A significant noise impact would be identified if construction-related noise would temporarily exceed 85 dBA L_{eq} as measured at 100 feet between the hours of 7:00 a.m. and 10:00 p.m., or 60 dBA L_{eq} at a distance of 100 feet between the hours of 10:00 p.m. and 7:00 a.m. Noise impacts from construction depend upon the noise generated by different pieces of construction equipment, the timing and duration of noise-generating activities, and the distance between construction noise sources and noise-sensitive areas. During each stage of construction, there would be a different mix of equipment operating, and noise levels would vary by stage and vary within stages, based on the amount of equipment in operation and the location at which the equipment is operating. Typical construction noise levels at a distance of 50 feet are shown in Table 4.13-4 and Table 4.13-5. Table 4.13-4 shows the average noise level ranges, by construction phase, and Table 4.13-5 shows the maximum noise level ranges for different construction equipment.

Table 4.13-4: Typical Ranges of Construction Noise Levels at 50 Feet, Leq (dBA)								
	Domestic Housing		Office Building, Hotel, Hospital, School, Public Works		Industrial Parking, Garage, Religious Amusement & Recreations, Store, Service Station		Public Works, Roads & Highways, Sewers and Trenches	
	I	II	I	II	I	II	I	II
Ground Clearing	83	83	84	84	84	83	84	84
Excavation	88	75	89	79	89	71	88	78
Foundations	81	81	78	78	77	77	88	88
Erection	81	65	87	75	84	72	79	78
Finishing	88	72	89	75	89	74	84	84
I – All pertinent equipment present at the site.								
II – Minimum required equipment present at the site.								
Source: U.S.E.P.A., Legal Compilation on Noise, Vol. 1, p. 2-104, 1973.								

Table 4.13-5: Construction Equipment 50-foot Noise Emission Limits		
Equipment Category	L _{max} Level (dBA) ^{1,2}	Impact/Continuous
Arc Welder	73	Continuous
Auger Drill Rig	85	Continuous
Backhoe	80	Continuous
Bar Bender	80	Continuous
Boring Jack Power Unit	80	Continuous
Chain Saw	85	Continuous
Compressor ³	70	Continuous
Compressor (other)	80	Continuous
Concrete Mixer	85	Continuous
Concrete Pump	82	Continuous
Concrete Saw	90	Continuous
Concrete Vibrator	80	Continuous
Crane	85	Continuous
Dozer	85	Continuous
Excavator	85	Continuous
Front End Loader	80	Continuous
Generator	82	Continuous
Generator (25 KVA or less)	70	Continuous
Gradall	85	Continuous
Grader	85	Continuous

Table 4.13-5: Construction Equipment 50-foot Noise Emission Limits		
Equipment Category	L _{max} Level (dBA) ^{1,2}	Impact/Continuous
Grinder Saw	85	Continuous
Horizontal Boring Hydro Jack	80	Continuous
Hydra Break Ram	90	Impact
Impact Pile Driver	105	Impact
Insitu Soil Sampling Rig	84	Continuous
Jackhammer	85	Impact
Mounted Impact Hammer (hoe ram)	90	Impact
Paver	85	Continuous
Pneumatic Tools	85	Continuous
Pumps	77	Continuous
Rock Drill	85	Continuous
Scraper	85	Continuous
Slurry Trenching Machine	82	Continuous
Soil Mix Drill Rig	80	Continuous
Street Sweeper	80	Continuous
Tractor	84	Continuous
Truck (dump, delivery)	84	Continuous
Vacuum Excavator Truck (vac-truck)	85	Continuous
Vibratory Compactor	80	Continuous
Vibratory Pile Driver	95	Continuous
All other equipment with engines larger than 5 HP	85	Continuous
Notes: ¹ Measured at 50 feet from the construction equipment, with a “slow” (1 sec.) time constant. ² Noise limits apply to total noise emitted from equipment and associated components operating at full power while engaged in its intended operation. ³ Portable Air Compressor rated at 75 cfm or greater and that operates at greater than 50 psi. Source: Mitigation of Nighttime Construction Noise, Vibrations and Other Nuisances, National Cooperative Highway Research Program, 1999.		

The overall duration of construction will be approximately eight months. Construction activities would take place during weekday daytime hours only (7:00 a.m. to 10:00 p.m.) and would include demolition of the existing structures in the eastern corner of the site, site preparation, building of the three additional classrooms, landscaping, and paving. Pile driving, which would have the potential to exceed permitted noise levels, is not proposed as a method of construction. Hourly average noise levels due to construction activities during busy outdoor construction periods would typically range from about 75 to 89 dBA L_{eq} at a distance of 50 feet. Construction-generated noise levels drop off at a rate of about 6 dBA per doubling of the distance between the source and receptor. This would reduce hourly average noise levels measured at a distance of 100 feet to between 69 to 83 dBA L_{eq}, which would not exceed the 85 dBA criterion for construction equipment noise set in the Municipal Code.

Construction noise levels are anticipated to meet the City of San Bruno's Municipal Code and would occur over a temporary period. Implementation of construction best management practices would further reduce the impact of construction activities, which would take place adjacent to residences along the northern, eastern, and southern sides of the site. Some residences to the south would be as close as 10 feet from construction activities taking place adjacent to shared property lines. With incorporation of the mitigation measures outlined below, the impact of construction noise on sensitive receptors in the site vicinity would be further reduced and would be in compliance with General Plan Policy HS-38.

Impact NOI-1.1: Construction of the project could result in temporary noise impacts to adjacent residents.

Mitigation Measures:

MM NOI-1.1: Implementation of the Best Management Practices below would reduce construction noise levels emanating from the site, limit construction hours, and minimize disruption and annoyance. With the inclusion of these practices and recognizing that noise and vibration generated by construction activities would occur over a temporary period, the temporary increase in ambient noise levels resulting from the project would be less than significant.

- Develop a construction noise control plan, including, but not limited to, the following available controls:
 - Limit construction hours to between 7:00 a.m. and 7:00 p.m., Monday through Friday
 - Construct temporary noise barriers to screen stationary noise-generating equipment. Temporary noise barriers shall be used during the heaviest periods of construction when there would be potential to exceed the Municipal Code limit of 85 dBA at 100 feet, or when heavy construction is occurring along shared property lines with residences. The temporary barriers shall be used during the:
 - demolition of existing structures on the eastern corner of the site and
 - when heavy ground clearing or excavation work is taking place within 50 feet of shared residential property lines.Temporary noise barrier fences would provide a 5 dBA noise reduction if the noise barrier interrupts the line-of-sight between the noise source and receiver and if the barrier is constructed in a manner that eliminates any cracks or gaps.
 - Equip all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment.
 - Unnecessary idling of internal combustion engines should be strictly prohibited.
 - Locate stationary noise-generating equipment, such as air compressors or portable power generators, as far as possible from sensitive receptors as

feasible. If they must be located near receptors, adequate muffling (with enclosures where feasible and appropriate) shall be used reduce noise levels at the adjacent sensitive receptors. Any enclosure openings or venting shall face away from sensitive receptors.

- Construction staging areas shall be established at locations that will create the greatest distance between the construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction.
- Control noise from construction workers' radios to a point where they are not audible at existing residential uses bordering the project site.
- The contractor shall prepare a detailed construction plan identifying the schedule for major noise-generating construction activities. The construction plan shall identify a procedure for coordination with adjacent land uses so that construction activities can be scheduled to minimize noise disturbance.
- Designate a "disturbance coordinator" who would be responsible for responding to any complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., bad muffler, etc.) and will require that reasonable measures be implemented to correct the problem. Conspicuously post a telephone number for the disturbance coordinator at the construction site and include in it the notice sent to neighbors regarding the construction schedule.

Implementation of the above best management practices would reduce construction noise levels and reduce the noise exposure of neighboring properties. With the implementation of these noise control measures and compliance with limitations and hours and construction equipment noise levels set forth in the Municipal Code, the project would have less than significant construction-noise impacts. **(Less than Significant Impact)**

Operational Noise

On-site noise-generating operational components when the school is occupied would include mechanical equipment such as heating, ventilation, air-conditioning, and refrigeration (HVAC) units, parking lot activities, and outdoor activities in the proposed playgrounds. The project includes installation of a retaining wall that would border portions of the property, including the staff parking lot to the north and east, the general parking lot to the south and west, the preschool play area to west, the kindergarten play area to the south and east, and the site access road leading to San Felipe Avenue on the east and west. The wall would vary in height between one foot and six feet, with most sections being four feet or lower. The wall would be constructed of concrete masonry blocks or poured-in concrete. Depending on height and location, the retaining wall could be expected to provide some noise attenuation.

Section 6.16.050 of the City's Municipal Code prohibits the generation of noise which would exceed ambient zone base levels by 10 dBA at the property plane of any property. The ambient zone base level of 60 dBA is used for residential zones such as those surrounding the site. This regulation allows for the ambient zone base level to be exceeded by 20 dBA for a period not to exceed 30 minutes during any 24-hour period.

Mechanical Equipment

The project does not propose any new mechanical equipment for the site. The school would continue to use the building's existing rooftop mechanical equipment. Since the school is not currently operational, noise levels generated by the existing system were not attained. Typical commercial HVAC units are anticipated to generate noise levels of 50 to 60 dBA at a distance of 30 feet. Existing HVAC equipment is located as close as approximately 60 feet from the nearest residence to the east of the school. At this distance, noise resulting from HVAC equipment would be around 44 to 54 dBA. This would be below the 60 dBA ambient zone base level established in the City's Municipal Code and would generally be below existing ambient daytime noise levels in the vicinity. HVAC equipment noise at other residences and sensitive receptors in the site vicinity would generally be indistinguishable from the ambient noise environment, which is mostly characterized by existing traffic. **(Less than Significant Impact)**

Parking Lot

Noise sources associated with the use of the proposed parking lot would include vehicular circulation, loud engines, car alarms, squealing tires, door slams, and human voices. The typical sound of a passing car at 15 mph would be about 50 to 60 dBA L_{max} at a distance of 50 feet. The noise of an engine start is similar. Door slams typically produce noise levels lower than engine starts. The hourly average noise level resulting from all these noise-generating activities in a small parking lot would reach 40 dBA L_{eq} at a distance of 50 feet from the parking area.

Residences are located approximately 50 feet from the center of the staff parking lot and 100 feet from the center of the general parking lot. The proposed retaining wall would separate both parking lots from the nearest sensitive receptors. Without any mitigation provided by the retaining wall, hourly average noise levels originating from the parking lots would reach 40 dBA L_{eq} at residences nearest the staff parking lot, and 34 dBA L_{eq} at residences nearest the general parking lot. Noise levels would generally be indistinguishable from existing ambient traffic noise sources. **(Less than Significant Impact)**

Play Areas

Use of the three proposed play areas is expected to generate noise from children yelling and playing and whistles during recess or physical education classes. Recess periods would occur from 9:50 a.m. to 10:20 a.m., from 2:20 p.m. to 2:55 p.m., and from 4:30 p.m. to 5:00 p.m., totaling one hour and thirty-five minutes of recess per school day. Average noise levels generated during playground activities typically range from 59 to 67 dBA L_{eq} at a distance of 50 feet. The larger kindergarten playground is located 200 feet from the nearest residence and shielded to the east by the school building. At a distance of approximately 200 feet from the nearest residence and considering shielding, noise levels resulting from the kindergarten playground could reach 42 to 50 dBA L_{eq} . The preschool play area is located approximately 250 feet from the nearest residence and considering shielding could result in noise levels reaching 40 to 48 dBA L_{eq} . The second kindergarten play area would be in a relatively unshielded location approximately 100 feet from the nearest residence. Noise levels resulting from activities at this play area could reach 53 to 62 dBA L_{eq} at the nearest residence.

Assuming worst-case prolonged play area activities occur continuously for an hour and 35 minutes per day in each play area, including use of the optional kindergarten play area, play area activities are

anticipated to result in an average day-night level of 50 dBA DNL at the nearest residence. This is 7 to 11 dBA DNL below measured ambient noise levels in the site vicinity. Noise levels without the use of the optional kindergarten play area would be even less. Play area activities are not anticipated to exceed the ambient zone base level of 60 dBA on an hourly (L_{eq}) or day-night average (DNL) level or result in a substantial increase above existing ambient noise levels (increase would be 1 dBA or less). **(Less than Significant Impact)**

Project Generated Traffic Noise

Based on the Transportation Impact Assessment discussed in Section 4.17, the most substantial traffic volume increases resulting from the project would occur during pick-up and drop-off periods. With the exception of areas adjacent to El Camino Real (SR 82), the ambient noise environment along local roadways is characterized primarily by vehicular traffic on more distant heavily trafficked highways (I-280, SR 82, and US 101). Project traffic would not be anticipated to result in measurable traffic noise increases along El Camino Real (noise increase would be less than 1 dBA). Existing noise levels at the site range between 58 and 61 dBA DNL. Traffic noise levels generated along local roadways under the existing plus project scenario would be in the range of 56 to 59 dBA L_{eq} . Existing plus project traffic noise levels generated along local roadways are similar to or below existing ambient levels that take into account noise levels from traffic on the nearby highways. Therefore, ambient traffic noise would not be anticipated to measurably increase above existing levels as a result of project-generated traffic. Noise increases on a DNL basis would be even lower. **(Less than Significant Impact)**

Impact NOI-2:	The project would not result in generation of excessive groundborne vibration or groundborne noise levels. (Less than Significant Impact with Mitigation Incorporated)
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The construction of the project may generate perceptible vibration when heavy equipment or impact tools (e.g. jackhammers, hoe rams) are used. Construction activities would include site demolition, preparation work, foundation work, and new building framing and finishing. As mentioned above, pile driving is not anticipated as a method of construction. Table 4.13-6 presents typical vibration levels that could be expected from construction equipment at a reference distance of 25 feet and calculated levels at other distances representative of sensitive receptors in the vicinity. Vibration levels would vary depending on soil conditions, construction methods, and equipment used.

The City of San Bruno does not specify a construction vibration limit. For structural damage, the California Department of Transportation recommends a vibration limit of 0.5 in/sec PPV for new residential and modern commercial/industrial structures which would be applicable to properties in the vicinity of the project site. The nearest sensitive receptors are residences located as close as 10 feet from the southern portion of the site. Other residences surrounding the site are within 25 to 100 feet.

Table 4.13-6: Vibration Source Levels for Construction Equipment					
Equipment		PPV at 10 ft. (in/sec)	PPV at 25 ft. (in/sec)	PPV at 50 ft. (in/sec)	PPV at 100 ft. (in/sec)
Clam shovel drop		0.553	0.202	0.094	0.044
Hydromill (slurry wall)	in soil	0.022	0.008	0.004	0.002
	in rock	0.047	0.017	0.008	0.004
Vibratory Roller		0.575	0.210	0.098	0.046
Hoe Ram		0.244	0.089	0.042	0.019
Large bulldozer		0.244	0.089	0.042	0.019
Caisson drilling		0.244	0.089	0.042	0.019
Loaded trucks		0.208	0.076	0.035	0.017
Jackhammer		0.096	0.035	0.016	0.008
Small bulldozer		0.008	0.003	0.001	0.001
Source: Transit Noise and Vibration Impact Assessment, United States Department of Transportation, Office of Planning and Environment, Federal Transit Administration, September 2018 as modified by Illingworth & Rodkin, Inc., March 2020.					

Vibration levels resulting from clam shovel drops and use of vibratory rollers have the potential to exceed the California Department of Transportation's recommended limit of 0.5 in/sec PPV for new residential structures at the nearest residences to the south when construction activities are occurring along shared property lines. Other residences as close as 25 feet from the site may experience perceptible vibration when heavy equipment is used but would not be at risk of architectural or structural damage. **(Significant Impact)**

Impact NOI-2.1: Groundborne vibration levels generated by construction equipment would result in a potentially significant impact at residences adjacent to the project site.

Mitigation Measures: The following mitigation measures would be implemented to reduce construction vibration impacts to a less than significant level:

MM NOI-2.1: The following mitigation measures would reduce this impact to a less-than-significant level at residential structures located within 15 feet of the shared property line.

- Avoid using vibratory rollers and tampers within 15 feet of residences on adjacent parcels.
- Avoid dropping heavy objects or materials within 15 feet of residences on adjacent parcels.

Implementation of the above measures would reduce this impact to a less than significant level. **(Less than Significant Impact with Mitigation Incorporated)**

Impact NOI-3: The project would not be located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport. The project would not expose people residing or working in the project area to excessive noise levels. **(No Impact)**

As discussed in Section 4.9, the proposed project would not be located within any aircraft noise contours identified in the SFO ALUCP, and overhead jet flyovers generate, at maximum, noise levels in the range of 60 to 66 dBA L_{max} based on recorded noise measurements. Therefore, people working in the project area would not be exposed to excessive aircraft noise levels. **(No Impact)**

4.13.3 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 the project are not considered CEQA impacts. The following discussion is included for informational purposes only because the City of San Bruno has policies that address existing noise conditions affecting a proposed project.

The future noise environment at the project site would continue to result primarily from traffic on local roadways and distant highways, including I-280, SR 82, and US 101. Existing noise levels at the site range between 58 and 61 dBA DNL. Based on the traffic noise contours provided in the San Bruno General Plan show, traffic noise levels in the site vicinity are anticipated to increase by 1 to 2 dBA under the future 2030 scenario. The following analysis assumes a future traffic noise increase of 2 dBA.

Exterior Noise

The project proposes two kindergarten play areas and one preschool play area. These areas would be located along the west side of the school building. Noise levels at these areas would be similar to those measured at ST-2. Factoring in a 2 dBA DNL increase under future traffic conditions, these outdoor areas would be exposed to a noise level of 61 dBA DNL. This would be within the San Bruno General Plan's "normally acceptable" threshold for outdoor use areas at schools of 70 dBA DNL.

Interior Noise

The Collaborative for High Performing Schools (CHPS) prerequisite criterion is 45 dBA L_{eq} or less indoors for core learning spaces. This criterion is 5 dBA below the 2019 Cal Green Code standard of 50 dBA L_{eq} for exterior-to-interior noise intrusion during hours of operation within non-residential uses.

Interior noise levels would vary depending upon the design of the building (relative window to wall area) and the selected construction materials and methods. Standard school construction provides approximately 15 dBA of exterior-to-interior noise reduction, assuming the windows are partially

open for ventilation. Standard construction with the windows closed provides approximately 20 to 25 dBA of noise reduction in interior spaces. Where exterior noise levels range from 60 to 65 dBA DNL, the inclusion of adequate forced-air mechanical ventilation can reduce interior noise levels to acceptable levels by allowing occupants the option of closing the windows to control noise. Where noise levels exceed 65 to 70 dBA DNL, forced-air mechanical ventilation systems and sound-rated construction methods are normally required. Such methods or materials may include a combination of sound-rated windows and doors, sound-rated exterior wall assemblies, and mechanical ventilation so windows may be kept closed at the occupant's discretion.

Taking into account a future traffic noise increase of 2 dBA, noise levels are not anticipated to exceed 61 dBA L_{eq} during school hours. Assuming standard construction with windows, both the Cal Green Code and the CHPS Prerequisite criterion would be met at all proposed classroom locations. CHPS additionally provides recommendations for Enhanced Acoustics, with levels of 35 dBA L_{eq} or less indoors for core learning spaces and 40 dBA L_{eq} or less for ancillary or assembly spaces. To achieve interior noise levels meeting Enhanced Acoustics recommendations, standard exterior wall construction with windows and doors meeting a Sound Transmission Class⁶⁹ (STC) of 28 or greater would be needed. For consistency with the Cal Green Code and CHPS criterion, the following Improvement Measures are recommended.

Improvement Measure:

- Building sound insulation requirements would need to include the provision of forced-air mechanical ventilation for all rooms so that windows could be kept closed at the occupant's discretion to control noise.
- If the CHPS standard for Enhanced Acoustics is desired, special building techniques should be used for construction of classrooms. Based on preliminary noise level analysis, standard exterior wall construction and windows and doors with STC ratings of 28 or greater would be required to be the 35 dBA L_{eq} CHPS Enhanced Acoustics goal in classrooms.

With incorporation of the above measures, interior noise levels would satisfy the Cal Green Code and the enhanced CHPS Prerequisite criterion.

⁶⁹ **Sound Transmission Class (STC)** A single figure rating designed to give an estimate of the sound insulation properties of a partition. Numerically, STC represents the number of decibels of speech sound reduction from one side of the partition to the other. The STC is intended for use when speech and office noise constitute the principal noise problem.

4.14 POPULATION AND HOUSING

4.14.1 Environmental Setting

4.14.1.1 *Regulatory Framework*

State

Housing-Element Law

State requirements mandating that housing be included as an element of each jurisdiction's general plan is known as housing-element law. The Regional Housing Need Allocation (RHNA) is the state-mandated process to identify the total number of housing units (by affordability level) that each jurisdiction must accommodate in its housing element. California housing-element law requires cities to: 1) zone adequate lands to accommodate its RHNA; 2) produce an inventory of sites that can accommodate its share of the RHNA; 3) identify governmental and non-governmental constraints to residential development; 4) develop strategies and a work plan to mitigate or eliminate those constraints; and 5) adopt a housing element and update it on a regular basis.⁷⁰ The City of San Bruno Housing Element and related land use policies were last updated on July 30, 2015.

Regional

Association of Bay Area Governments (ABAG)

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).

4.14.1.2 *Existing Conditions*

According to the California Department of Finance, the City of San Bruno had a population of 45,257 as of January 1, 2019, a zero percent increase from the previous year.⁷¹ The Association of Bay Area Governments (ABAG) projects the City's population will be 51,370 by 2040.⁷² As of 2010, there were 14,701 households with an average of 2.77 persons per household.⁷³

Historically, the site has not provided housing and there are no current residents, and the project is projected to add zero housing units while providing jobs for an estimated 35 employees.

⁷⁰ California Department of Housing and Community Development. "Regional Housing Needs Allocation and Housing Elements" Accessed January 8, 2020. <http://hcd.ca.gov/community-development/housing-element/index.shtml>.

⁷¹ California Department of Finance. "E-1 Population Estimates for Cities, Counties, and the State – January 1, 2018 and 2019." <http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-1/> Accessed January 8, 2020.

⁷² Association of Bay Area Governments. *Projections 2040, A Companion to Plan Bay Area 2040*. November 2018.

⁷³ City of San Bruno. *City of San Bruno Housing Element 2015-2023*. April 2015.

4.14.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
1) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input 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)**

A project can induce substantial population growth by proposing new housing beyond projected or planned development levels, generating demand for housing as a result of new businesses, extending roads or other infrastructure to previously undeveloped areas, or removing obstacles to population growth (e.g., expanding capacity of a wastewater treatment plant beyond that necessary to serve planned growth).

The proposed project involves the demolition of existing secondary structures (totaling 2,909 square feet) and construct 3,280 square feet of new classrooms at the site of the former El Crystal Elementary School. The San Bruno General Plan's projections for population and job growth in the City account for the operation of the El Crystal Elementary School at the project site. As such, the project does not propose a new use at the site that would induce unplanned population growth. **(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)**

There are no housing units or residences on-site, therefore, the project would not displace existing housing or people. **(No Impact)**

4.15 PUBLIC SERVICES
4.15.1 Environmental Setting
4.15.1.1 *Regulatory Framework*

State

Government Code Section 66477

The Quimby Act (included within Government Code Section 66477) requires local governments to set aside parkland and open space for recreational purposes. It provides provisions for the dedication of parkland and/or payment of fees in lieu of parkland dedication to help mitigate the impacts from new residential developments. The Quimby Act authorizes local governments to establish ordinances requiring developers of new residential subdivisions to dedicate parks, pay a fee in lieu of parkland dedication, or perform a combination of the two.

Regional and Local

County of San Mateo Trails Master Plan

Adopted in 2001, the County of San Mateo Trails Master Plan is intended to, among other objectives, provide policies and guidelines for trails planning and to define environmental issues and mitigation measures for trail management.

City of San Bruno General Plan

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

Policies	Description
LUD-76	Assure that new development mitigates impacts on existing public services, including transit services, water, sewer, and storm drainage systems, police and fire protection, libraries, and parks and recreation facilities.
PFS-39	Minimize risks to single-access residential neighborhoods by providing alternative access for fire and other emergency personnel.

City of San Bruno Municipal Code

Per Section 12.44 of the City's Municipal Code, San Bruno assesses a parkland dedication/in-lieu fees standard of 4.5 acres per 1,000 residents in accordance with the General Plan's parkland standards.

4.15.1.2 Existing Conditions

Fire Protection Services

Fire protection services are provided by the San Bruno Fire Department, which employs 35 full-time firefighters and 10 trained “Paid Call Reserves” operating out of two fire stations. Station 51 is located on the south side of the City Hall complex at 555 El Camino Real approximately 1.2 miles from the project site, and covers the area east of Interstate 280. Station 52 is located near the intersection of Sneath Lane and Earl Avenue at 1999 Earl Avenue, approximately 3.1 miles from the project site, and responds to emergency calls west of I-280.

Response times average two to three minutes measured against a countywide average of nearly seven minutes. Overall, on a scale from one (best) to ten (worst), based on the Public Protection Classifications (PPC) of the Insurance Services Office, Inc. (ISO), the San Bruno Fire Department has an overall rating of three, considered a top rating.⁷⁴

Police Protection Services

Police protection services are provided by the San Bruno Police Department (SBPD). Police headquarters are located at 1177 Huntington Avenue, approximately 2.5 miles from the project site, and share the facilities with Bay Area Rapid Transit (BART) police.

SBPD employs 45 full-time sworn officers, 19 civilian employees, 7 reserve police officers, and two police canines who provide police services and public safety dispatching to approximately 45,000 residents of the City of San Bruno. The Department deploys officers in a beat management system, which divides the City into three beats. Beat One covers an irregular area roughly bordered by San Bruno’s northern, eastern, and southern city limits, and a western perimeter that follows Huntington Avenue to San Bruno Avenue East, then follows San Bruno Avenue further west to I-280. Beat Two, which includes the project site, covers the area bounded by San Bruno Avenue East to the north, Huntington Avenue to the east, and I-280 to the west, and extends to the southern city limits. Beat Three covers the area west of I-280.⁷⁵

Schools

Four different school districts serve San Bruno residents from kindergarten through the community college level: San Bruno Park Elementary School District, South San Francisco Unified School District, San Mateo Union High School District, and the San Mateo Community College District. The project area is serviced by John Muir Elementary School (approximately 2.6 miles west of the subject site), Parkside Middle School (approximately 4,750 feet northwest of the subject site), and Capuchino High School (approximately 1 mile southeast of the subject site). School enrollment in San Bruno has been consistently decreasing since 2000, with a nine percent decrease from 4,515 students in 2005 to 4,103 students in 2009. Buildout of the San Bruno General Plan is projected to raise student enrollment to 5,100 students by 2025.

The project site is occupied by the former El Crystal Elementary School, which consists of existing primary and secondary structures (totaling 21,569 square feet), of primary and secondary structures,

⁷⁴ City of San Bruno. *San Bruno General Plan Draft EIR*. December 2008.

⁷⁵ City of San Bruno. *San Bruno General Plan Draft EIR*. December 2008.

paved outdoor play areas, three playgrounds, and three surface parking areas that were previously in operation as the El Crystal Elementary School until June 2018. Enrollment during the final year totaled 262 students from grades K through 6. Outdoor play areas were available to the public outside of school hours, with the parking lots and facilities closed to the public at all hours unless an event open to the public was occurring.

Parks

San Bruno currently provides its residents with a total of 72 acres of city parkland. There are five small pocket parks, 12 neighborhood parks, and one large community park. The Parks and Recreation Services Department maintains all developed municipal park sites, four school sites, street medians, and landscaping along San Mateo Avenue and at other City facilities. In addition to city parks, local recreation centers, school facilities, and a 108-acre regional park—San Mateo County’s Junipero Serra Park—provide recreational opportunities for San Bruno residents. Hiking and cycling trails are located west of the city boundary within the Golden Gate National Recreation Area and the San Francisco Peninsula Watershed, accessible from Sneath Lane and San Bruno Avenue.

The project site itself is bordered by San Bruno City Park, and is approximately 2,150 feet southwest of Junipero Serra Park, 3,000 feet northwest of Grundy Park, 3,250 feet northeast of Lions Park, and 1.25 miles southeast of Manor Park. City Park, Grundy Park, and Lion’s Field are the City’s most utilized parks.

Other Public Facilities

The San Bruno Public Library, located off of El Camino Real adjacent to City Hall at 701 Angus Ave W, is approximately 1.25 miles from the subject site. A member library of the Peninsula Library System, the San Bruno Public Library provides children and adult programming as well as Spanish and Japanese language materials, and has over 120,000 circulating items including books, magazines, videos, DVDs, CDs, and books on tape and CD. A shortage of materials and resources (book collection, public computers, parking, etc.) was identified in the City of San Bruno’s Facility Master Plan prepared in August 2000.

There are four different recreation centers in San Bruno: the Belle Air Community Center (approximately 3,900 feet northeast of the site), the Portola Performing Arts Center (approximately 2.25 miles northwest), the San Bruno Senior Center (approximately 1,700 feet southwest), and the Veterans Memorial Recreation Center (approximately 600 feet west).⁷⁶

⁷⁶ Demolition and reconstruction of the Veterans Memorial Recreation Center is currently being considered by the City of San Bruno.

4.15.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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)**

The proposed project involves remodeling of the former El Crystal Elementary School to facilitate operation of a private preschool and kindergarten. Enrollment for El Crystal Elementary School during the final year totaled 262 students from grades K through 6. The proposed project would have a maximum enrollment of 348 students (288 Pre-K and 60 Kindergarten), which is a net increase of 86 students. As a result, there would be an incremental increase in demand on the San Bruno Fire Department. This increase in demand would not prevent the San Bruno Fire Department from maintaining acceptable response times nor would it require the construction of new facilities to ensure adequate service to the surrounding areas. The proposed buildings would be constructed in compliance with the 2019 California Building Code and the 2019 California Fire code to ensure the building is fire safe. The project site is not located in an area designated as a wildland fire hazard. As part of the permitting process, the San Bruno 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. The moderate increase in enrollment is not anticipated to generate significant demand for fire protection services, and therefore would not result in the need for new or expanded facilities, the project's potential impact on fire protection services would not be substantial. **(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 have a maximum enrollment of 348 students (288 Pre-K and 60 Kindergarten), which is a net increase of 86 students when compared to El Crystal Elementary School's final year of operation. As a result, there would be an incremental increase in demand on the San Bruno Police Department. This increase is not expected to be substantial. The estimated increase of 86 students would not require new or expanded police facilities to retain acceptable service ratios and/or response times in the area. The San Bruno Police Department would be able to adequately service the proposed project and its surrounding areas without constructing new facilities or expanding current facilities, both of which could result in environmental impacts. **(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)**

The project itself is a school facility; the environmental effects of the proposed school facility are analyzed throughout this Initial Study. The project would have a maximum enrollment of 348 students (288 Pre-K and 60 Kindergarten). The project would likely decrease the demand for new or physically altered school facilities by providing an alternative option for preschool and kindergarten education. Therefore, the proposed project would not indirectly cause environmental impacts by requiring the construction or expansion of school facilities. **(Less than Significant Impact)**

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)**

The proposed project does not include residential development. It is reasonable to anticipate the future school students and staff may use nearby recreational facilities, such as parks and community centers, for after-school activities; however, the increase in use at these facilities would be marginal.

The proposed school includes recreational facilities including playgrounds. Students would predominantly use the on-campus facilities to meet their recreational needs; therefore, the project

would not increase demand upon off-site park facilities in the project area. **(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)
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The proposed project, as a school facility, would not substantially increase the demand for other public facilities, such as libraries and community centers. No new residences would be added to the area as a component of the project, therefore the project would not increase the local population.

Students of the proposed school could potentially utilize nearby public facilities in the City including the San Bruno Public Library, the Belle Air Community Center, the Portola Performing Arts Center, the San Bruno Senior Center, and the Veterans Memorial Recreation Center for after-school recreation and/or study. However, the increase in use is not expected to require expansion of existing facilities or construction of new facilities. **(Less than Significant Impact)**

4.16 RECREATION

4.16.1 Environmental Setting

4.16.1.1 *Regulatory Framework*

State

Government Code Section 66477

The Quimby Act (included within Government Code Section 66477) requires local governments to set aside parkland and open space for recreational purposes. It provides provisions for the dedication of parkland and/or payment of fees in lieu of parkland dedication to help mitigate the impacts from new residential developments. The Quimby Act authorizes local governments to establish ordinances requiring developers of new residential subdivisions to dedicate parks, pay a fee in lieu of parkland dedication, or perform a combination of the two.

Regional and Local

County of San Mateo Trails Master Plan

Adopted in 2001, the County of San Mateo Trails Master Plan is intended to, among other objectives, provide policies and guidelines for trails planning and to define environmental issues and mitigation measures for trail management.

City of San Bruno General Plan

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

Policies	Description
LUD-76	Assure that new development mitigates impacts on existing public services, including transit services, water, sewer, and storm drainage systems, police and fire protection, libraries, and parks and recreation facilities.
T-32	Encourage design of public and private development to frame vistas of the Downtown, public buildings, parks, and natural features.
OSR-1	Maintain a parkland dedication/in lieu fee standard of 4.5 acres/1,000 residents.

City of San Bruno Municipal Code

Per Section 12.44 of the City's Municipal Code, San Bruno assesses a parkland dedication/in-lieu fees standard of 4.5 acres per 1,000 residents in accordance with the General Plan's parkland standards.

4.16.1.2 *Existing Conditions*

Parks

San Bruno currently provides its residents with a total of 72 acres of city parkland. There are five small pocket parks, 12 neighborhood parks, and one large community park. The Parks and Recreation Services Department maintains all developed municipal park sites, four school sites, street medians, and landscaping along San Mateo Avenue and at other City facilities. The project site itself is bordered by San Bruno City Park, and approximately 2,150 feet southwest of Junipero Serra Park, 3,000 feet northwest of Grundy Park, 3,250 feet northeast of Lions Park, and 1.25 miles southeast of Manor Park. City Park, Grundy Park, and Lion's Field are the City's most utilized parks. Based on the projected increase in San Bruno's population from buildout of the General Plan, an additional 20 acres of new parkland will be needed within the City.

Recreation

In addition to city parks, local recreation centers, school facilities, and a 108-acre regional park—San Mateo County's Junipero Serra Park—provide recreational opportunities for San Bruno residents. Hiking and cycling trails are located west of the city boundary within the Golden Gate National Recreation Area and the San Francisco Peninsula Watershed, accessible from Sneath Lane and San Bruno Avenue. There are four different recreation centers in San Bruno: the Belle Air Community Center (approximately 3,900 feet northeast of the site), the Portola Performing Arts Center (approximately 2.25 miles northwest), the San Bruno Senior Center (approximately 1,700 feet southwest), and the Veterans Memorial Recreation Center (approximately 600 feet west). The project site itself provides recreational opportunities through use of its playground structures and paved play surfaces outside of school hours of operation.

4.16.2 **Impact Discussion**

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
1) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility 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 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 proposed project involves remodeling of the former El Crystal Elementary School to facilitate operation of a private preschool and kindergarten. The project does not include residential development and would not increase the local population. It is reasonable to anticipate the future school students and staff may use nearby recreational facilities, such as parks and community centers, for after-school activities; however, the increase in use at these facilities would be negligible.

The proposed school includes recreational facilities to serve the student needs. Students would predominantly use the on-campus facilities to meet their recreational needs, thereby reducing the demand placed on off-site recreational facilities in the area. For these reasons, the proposed project would not increase the use of parks or other recreational facilities to the extent that physical deterioration of the facilities would occur or be accelerated. **(Less than Significant Impact)**

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

As part of the proposed development, play areas in the northeast and southwest corner of the existing development would be removed, allowing for an expansion to the parking facilities on-site. Existing recreational space would be replaced with an expanded play area totaling 6,622 square feet that would be dedicated to preschoolers, and two new play areas totaling 4,170 square feet dedicated to kindergartners. The impacts of these recreational facilities are analyzed throughout this Initial Study in the context of the overall development proposed by the project. Therefore, the recreational facilities proposed by the project would not have an adverse physical effect on the environment. **(Less than Significant Impact)**

4.17 TRANSPORTATION

The following discussion is based in part on a Transportation Impact Analysis prepared by *Fehr & Peers*. A copy of this report dated April 2020 is included in Appendix D of this Initial Study.

4.17.1 Environmental Setting

4.17.1.1 *Regulatory Framework*

State

Senate Bill 743

SB 743 establishes criteria for determining the significance of transportation impacts using a vehicle miles traveled (VMT) metric intended to promote the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses. Specifically, SB 743 requires the analysis of VMT in determining the significance of transportation impacts. Local jurisdictions are required by Governor's Office of Planning and Research (OPR) to implement a VMT policy by July 1, 2020.

SB 743 did not authorize OPR to set specific VMT impact thresholds, but it did direct OPR to develop guidelines for jurisdictions to utilize. CEQA Guidelines Section 15064.3(b)(1) describes factors that might indicate whether a development project's VMT may be significant. Notably, projects located within 0.5 mile of transit should be considered to have a less than significant transportation impact based on OPR guidance.

Regional and Local

Regional Transportation Plan

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 a Regional Transportation Plan to guide regional transportation investment for revenues from federal, state, regional and local sources through 2040.

San Mateo County Comprehensive Bicycle Route Plan

The San Mateo County Comprehensive Bicycle Route Plan was written by the C/CAG, the Bicycle and Pedestrian Advisory Committee, and individual cities and agencies. The intent of the plan is to provide a comprehensive bicycle network for San Mateo County and adjacent communities, to improve inter-city and regional travel for bicycles. The plan includes existing roadways within San Mateo County, including roadways in the project area.

County of San Mateo Trails Master Plan

Adopted in 2001, the County of San Mateo Trails Master Plan is intended to, among other objectives, provide policies and guidelines for trails planning and to define environmental issues and mitigation measures for trail management.

City of San Bruno General Plan

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

Policies	Description
LUD-9	Provide safe and comfortable pedestrian routes through residential areas by requiring sidewalks on both sides of streets, planting street trees adjacent to the curb, allowing on-street parking, and minimizing curb cuts.
LUD-76	Assure that new development mitigates impacts on existing public services, including transit services, water, sewer, and storm drainage systems, police and fire protection, libraries, and parks and recreation facilities.
T-A	Provide for efficient, safe, and pleasant movement for all transportation modes—vehicles, bicycles, transit, and pedestrians.
T-B	Maintain acceptable levels of service for vehicular movement along the city's street network. Acceptable level of service could vary based on characteristics of the area under consideration.
T-F	Provide efficient local transit—such as a shuttle system—to the BART and Caltrain stations to avoid dependence on individual motor vehicles.
T-G	Protect residential areas from congestion and associated noise resulting from BART and Caltrain spillover traffic.
T-2	Ensure that all transportation improvements—roadway, transit, bicycle, and pedestrian—are designed and constructed according to Americans with Disabilities Act standards. Improve existing facilities so they are compliant with American Disability Act standards.
T-3	Encourage provision of bicycle facilities such as weather protected bicycle parking, direct and safe access for pedestrians and bicyclists to adjacent bicycle routes and transit stations, showers and lockers for employees at the worksite, secure short-term parking for bicycles, etc.
T-6	Maintain LOS standards for intersections for AM and PM peak periods as shown in Figure 4-2.
T-7	Undertake improvements to intersections shown T-7 in Table 4-8 and in Figure 4-7 to ensure their operation at the LOS shown in Figure 4-2. Determine costs for these improvements and establish an impact fee program to assess improvement costs to new development, proportionate to the impacts created by such development.
T-22	Apply turning restrictions to major arterials during peak hours to improve general traffic flow.
T-37	Require provisions and marking of handicapped parking spaces in conformance with California Vehicle Code to allow enforcement by public agencies or private interests.
T-42	Do not allow parking lots to dominate the frontage of mixed-use streets, interrupt pedestrian routes, or negatively impact surrounding neighborhoods.
T-71	Provide bicycle parking facilities in Downtown, Bayhill Office Park, BART and Caltrain Stations, The Shops at Tanforan and Towne Center, parks, schools, and other key destinations. Review bicycle standards as part of the Zoning Ordinance Update.
T-74	Ensure maintenance of vegetation along bicycle routes within the city. Ensure that overgrown vegetation does not push bicyclists into vehicular travel lanes and cause potential accidents.
T-77	Create a pedestrian-oriented setting along the Pedestrian Emphasis Zones (see Figure 4-6) through potential construction of the following public improvements: <ul style="list-style-type: none">• Brick pavers to make sidewalks look more distinct;• Street trees to soften the environment and provide color and shade;• Human-scale street lights for enhanced aesthetics and illumination;

Policies	Description
	<ul style="list-style-type: none"> • Banners and flags to make the area look more festive and cheerful; and • Benches to give people a place to sit, rest, and watch what goes on around them.
T-79	Prioritize improvements to sidewalks and other walking paths adjacent to public school facilities where children and youth are likely to use them on a daily basis.
T-81	Provide for public safety and efficient operation in the planning, construction, and maintenance of transportation facilities.
HS-18	Require right-of-way landscaping to be maintained at an appropriate scale, so as to not reduce visibility at intersections.

City of San Bruno Transportation Element

The transportation element of the San Bruno General Plan describes San Bruno’s existing transportation network, including roadway and highway system, scenic corridors, transit systems, and pedestrian and bicycle facilities, and provides policies that address all modes of transportation, as well as the interrelationship between the modes. Circulation and traffic within the City specifically are analyzed by examining roadway and intersection operations in terms of “level of service” (LOS), which is a measure of driving conditions and vehicle delay. Levels of service range from A (best) to F (poorest). LOS A, B and C indicate conditions where traffic can move relatively freely. LOS D describes conditions where delay is more noticeable. LOS E indicates conditions where traffic volumes are at or close to capacity, resulting in significant delays and average travel speeds that are one-third the uncongested speeds or lower. LOS F characterizes conditions where traffic demand exceeds available capacity, with very slow speeds (stop-and-go), long delays (over a minute) and queuing at signalized intersections.

4.17.1.2 *Existing Conditions*

The 2.73-acre site is currently occupied by the former El Crystal Elementary School, which consists of existing primary and secondary structures which total approximately 18,602 square feet. The project site is bordered on the northwest by San Bruno City Park and residential uses to the north, east, south, and southwest.

Regional Access

Regional access to the project site is provided by El Camino Real and Crystal Springs Road which provide connections to US Highway 101 (US 101) and Interstate 280 (I-280), respectively. These facilities are described below.

US 101 is an eight-lane north-south freeway that extends northward through San Francisco and southward through San Jose. US 101 is connected to the project site via the El Camino Real - Interstate 380 (I-380) interchange.

I-280 is an eight-lane north-south freeway that terminates in San Francisco to the north and transitions into Interstate 680 (I-680) in San Jose. I-280 is connected to the project site via the interchange on Crystal Springs Road west of the project site.

El Camino Real is a two-way north-south street with three travel lanes in each direction and includes left-turn lanes at most intersections. The roadway has on-street parking and sidewalks on each side of

the street. The roadway is approximately 95 feet wide and each sidewalk is approximately seven feet wide. El Camino Real meets San Felipe to the west of the project site at a signalized intersection. El Camino Real connects to Interstate-380 (I-380) to the north of the project site, which connects travelers to I-280 and US-101.

Crystal Springs Road is a two-way east-west street with one travel lane in each direction and on street parking and sidewalks on each side of the street. The roadway is approximately 30 feet wide. The northside sidewalk ranges from approximately four to nine feet wide, while the southside sidewalk ranges from approximately four to six feet wide. Crystal Springs Road intersects with Cypress Avenue to the north of the Project Site, and connects to I-280 to the west of the project site.

Local Access

Local access to the project site is provided via Anza Way, Balboa Way, Cypress Avenue, and San Felipe Avenue. These roadways are described below.

Anza Way is a two-way north-south street with one travel lane in each direction and on-street parking and sidewalks on each side of the street. The roadway is approximately 28 feet wide, and each sidewalk is approximately five feet wide. Anza Way intersects Santa Lucia Avenue to the south of the project site, with side-street stop control for Anza Way, and terminates at the project site in a roundabout with 90-degree street parking. Anza Way has a steep grade adjacent to the project site.

Balboa Way is a two-way, north-south street with one travel lane in each direction and on-street parking and sidewalks on each side of the street. The roadway is approximately 28 feet wide, and each sidewalk is approximately five feet wide. Balboa Way intersects Santa Lucia Avenue to the south of the project site and is all-way stop controlled. The roadway terminates at the project site in a roundabout with angled street parking and has a steep grade adjacent to the project site.

Cypress Avenue is a two-way north-south street with one travel lane in each direction and on street parking and sidewalks on each side of the street. The roadway is approximately 22 feet wide and each sidewalk is approximately five feet wide. Cypress Avenue intersects with San Felipe Avenue and is all-way stop controlled, and includes yellow, high-visibility zebra-striped crosswalks, which indicate the presence of a school nearby. Cypress Avenue has multiple traffic calming speed bumps to the north and south of the intersection with San Felipe Avenue. Cypress Avenue also has a steep grade adjacent to the project site.

San Felipe Avenue is a two-way east-west street with one travel lane in each direction and on-street parking and sidewalks on each side of the street. The roadway is approximately 25 feet wide and each sidewalk is approximately five feet wide. To the east of the project site, San Felipe terminates at the project site. To the west, San Felipe eventually intersects with El Camino Real. San Felipe Avenue has a steep grade adjacent to the project site.

Existing Transit Facilities

SamTrans is the primary regional and local transit provider within San Mateo County, serving all rail stations within the County and major transit transfer points for Santa Clara and San Francisco counties. SamTrans' ECR bus route provides service in both directions along El Camino Real and

stops at El Camino Real and San Felipe Avenue. These stops are within a 5-minute walk of the project site. The ECR route provides a connection to the San Bruno BART station, as well as a connection to the Daly City BART station to the north and the Palo Alto Transit Center to the south. SamTrans bus route 141 provides limited service to the San Bruno Senior Center near the project site and connects to San Bruno BART. The nearest rail station, the San Bruno Caltrain station, is located a little over a mile from the project site. San Bruno BART is located a half mile beyond the Caltrain station. Existing transit service in the project vicinity is shown in Figure 4.17-1.

Existing Pedestrian and Bicycle Facilities

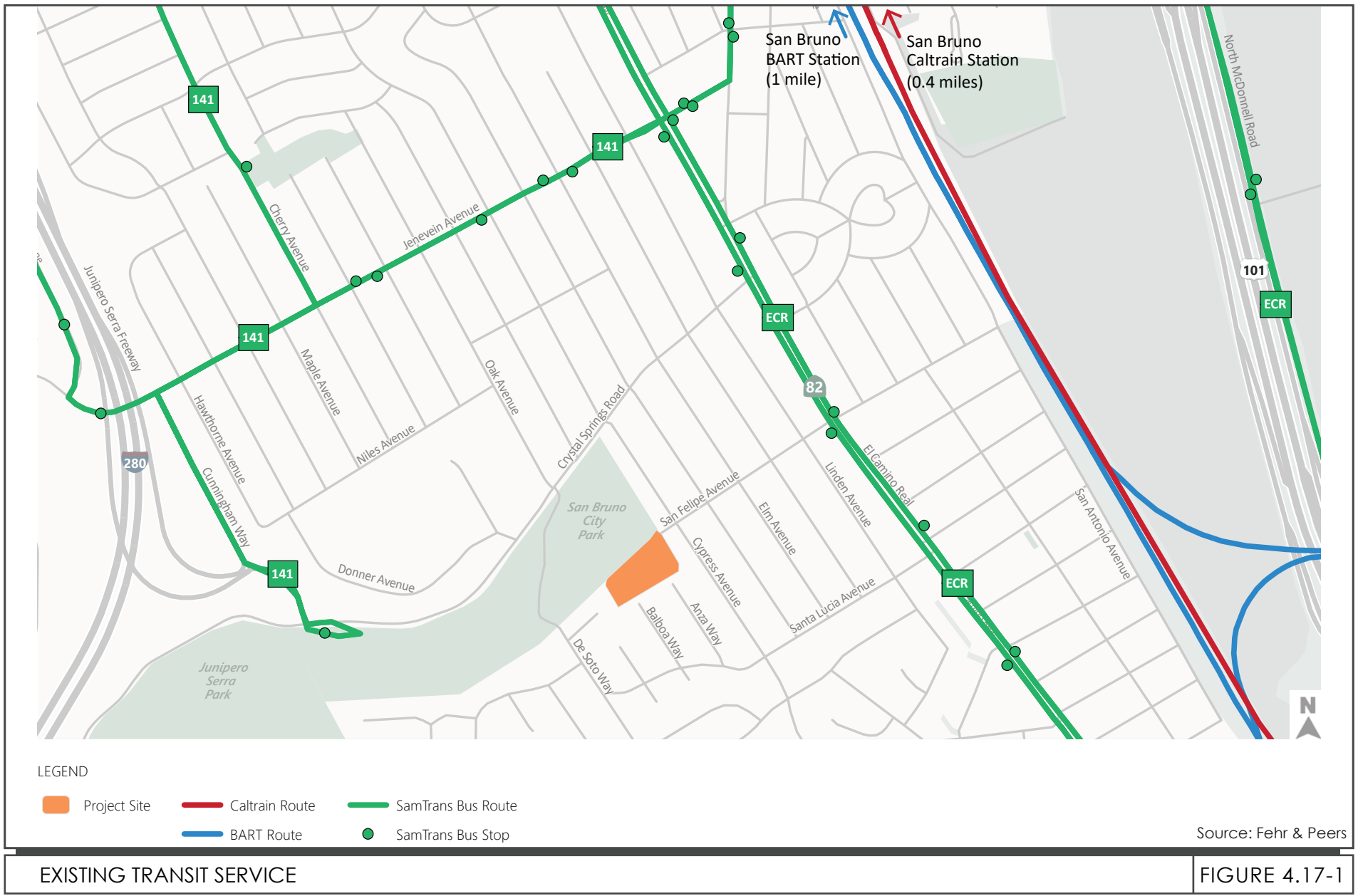
The all-way stop-controlled intersection of Balboa Way and Santa Lucia Avenue has yellow standard striped crosswalks at each intersection approach. Most but not all of the street corners have curb ramps.

There is a marked crosswalk at the intersection of Anza Way and Santa Lucia Avenue to cross Anza Way on the north side of the intersection, but no crosswalks across Santa Lucia Avenue. There are no curb ramps at the intersection.

The San Felipe Avenue and Cypress Avenue intersection is all-way stop-controlled and includes yellow, high visibility zebra-striped crosswalks at each intersection approach. Each corner has a diagonal curb ramp. Other intersections on San Felipe Avenue leading up to El Camino Real (i.e. intersections with Acacia Avenue, Elm Avenue, Poplar Avenue, and Linden Avenue) are all side street stop-controlled and do not include marked crosswalks. Most intersections on Santa Lucia Avenue leading up to El Camino Real are uncontrolled and do not include marked crosswalks.

Pedestrians can also access the project site via a multi-use path. The path circles the project site and connects San Felipe Avenue to Anza Way, Balboa Way, Cabrillo Way, and San Bruno City Park. The multi-use path is approximately three feet wide and paved but in poor condition.

Currently, there are no bicycle facilities adjacent to the project site. However, the City of San Bruno has adopted the *San Bruno Walk 'n Bike Plan*, which includes a proposal for several nearby Class III bike routes, as illustrated in Figure 4.17-2 below.



EXISTING TRANSIT SERVICE

FIGURE 4.17-1



LEGEND

- Project Site
- Waln 'n Bike Plan Proposed Class III Bicycle Routes

Source: Fehr & Peers

PROPOSED BICYCLE FACILITIES

FIGURE 4.17-2

4.17.1.1 *Study Methodology*

The *Transportation Impact Assessment* conducted by Fehr & Peers is intended to identify any potentially significant impacts from the proposed project on the surrounding transportation system and to review site access and circulation. Potential impacts were evaluated following the standards and methodologies set forth by the City of San Bruno and C/CAG of San Mateo County.

Traffic conditions were evaluated for the following scenarios:

Scenario 1 – Existing Conditions: Existing traffic volumes were obtained by collecting turning movement counts at selected intersections adjacent to the project site.

Scenario 2 – Existing Plus Project Conditions: Existing plus project traffic volumes were estimated by adding to existing traffic volumes the trips associated with the proposed project. Existing plus project conditions were evaluated relative to existing conditions in order to determine potential project impacts.

The data required for the analysis was obtained from field observations, traffic counts, applicant-provided materials, the County of San Mateo, the California Household Travel Survey, and the Institute of Transportation Engineers (ITE) Trip Generation, 10th Edition. This study also utilized the Transportation Research Board of the National Academies of Science's 2010 Highway Capacity Manual (HCM 6th Edition) methodology for signalized intersections, implemented with Synchro. This method evaluates intersection operations based on average control delay time for all vehicles at the intersection. This average delay can then be correlated to a LOS level. Typical LOS criteria are defined in Table 4.17-1.

Table 4.17-1: Intersection LOS Criteria			
Description	LOS	Average Control Delay (seconds per vehicle)	
		Unsignalized Intersections	Signalized Intersections
Represents free flow. Individual users are virtually unaffected by others in the traffic stream.	A	≤ 10	≤ 10
Stable flow, but the presence of other users in the traffic stream begins to be noticeable.	B	> 10 to 15	> 10 to 20
Stable flow, but the operation of individual users becomes significantly affected by interactions with	C	> 15 to 25	> 20 to 35

Table 4.17-1: Intersection LOS Criteria			
Description	LOS	Average Control Delay (seconds per vehicle)	
		Unsignalized Intersections	Signalized Intersections
others in the traffic stream.			
Represents high-density, but stable flow.	D	> 25 to 35	> 35 to 55
Represents operating conditions at or near the capacity level.	E	> 35 to 50	> 55 to 80
Represents forced or breakdown flow.	F	> 50	> 80
Source: Transportation Research Board of the National Academies of Science, <i>Highway Capacity Manual 6th Edition</i> , 2017.			

The General Plan establishes LOS for specific intersections listed in the Transportation Element, but it does not establish citywide LOS standards that apply to all City intersections. LOS D is required to be maintained at the El Camino Real/San Felipe Avenue intersection, but no other intersections near the project have specified acceptable LOS. For the purposes of this analysis, acceptable LOS will be defined as LOS D for both signalized and unsignalized intersections around the project. At unsignalized intersections, LOS is defined by the intersection approach that operates the “worst” rather than overall, average intersection LOS, which is the standard for signalized intersections. Descriptions of levels of service for signalized intersections, together with their corresponding volume-to-capacity ratios (V/Cs), are presented in Table 4.17-2. Table 4.17.3 presents Level of Service definitions for unsignalized intersections.

Table 4.17-2: Level of Service Definitions – Signalized Intersections		
Level of Service	Volume to Capacity Ratio	Description
A	≤ 0.60	Uncongested operations; all queues clear in a single signal cycle
B	0.61-0.70	Very light congestion; an occasional approach phase is fully utilized.
C	0.71-0.80	Light congestion; occasional backups on critical approaches.
D	0.81-0.90	Significant congestion on critical approaches, but intersection functional. Cars required to wait through more than one cycle during short peaks. No long-standing queues formed.
E	0.91-1.00	Severe congestion with long-standing queues on critical approaches. Blockage of intersection may occur if traffic signal does not provide for protected turning movements. Traffic queue may block nearby intersection(s) upstream of critical approach(es).
F	>1.00	Total breakdown, stop-and-go operation.
Source: City of San Bruno. <i>San Bruno General Plan</i> . March 2009.		

Table 4.17-3: Level of Service Definitions – Unsignalized Intersections		
Level of Service	Expected Delay Average	Total Delay (Seconds)
A	Little or no delay	≤ 5
B	Short traffic delay	>5 and ≤ 10
C	Average traffic delays	>10 and ≤ 20
D	Long traffic delays	>20 and ≤ 30
E	Very long traffic delays	> 30 and ≤ 45
F	Extreme delays potentially affecting other traffic movements in the intersection	>45
Source: City of San Bruno. <i>San Bruno General Plan</i> . March 2009.		

Vehicle Miles Traveled

VMT is a measurement of the amount and distance that a person drives, accounting for the number of passengers within a vehicle. VMT is calculated by multiplying the number of trips generated by a project by the total distance of each of those trips. Since the City of San Bruno has yet to adopt a VMT methodology and threshold, a project-specific methodology and threshold was determined for the project.

Level of Service

Existing intersection LOS conditions in the surrounding area were established by collecting turning movement counts and measuring the average delay per vehicle during the weekday morning (7:00 to 9:00 AM) and weekday afternoon school peak period (2:00 PM to 4:00 PM) at the six selected intersections shown below. Counts were taken on October 1, 2019, February 26, 2020 and March 3, 2020, prior to the San Mateo County Shelter in Place Order issued March 16, 2020, and therefore reflect normal traffic conditions. Traffic conditions have substantially lightened since the Shelter Order.

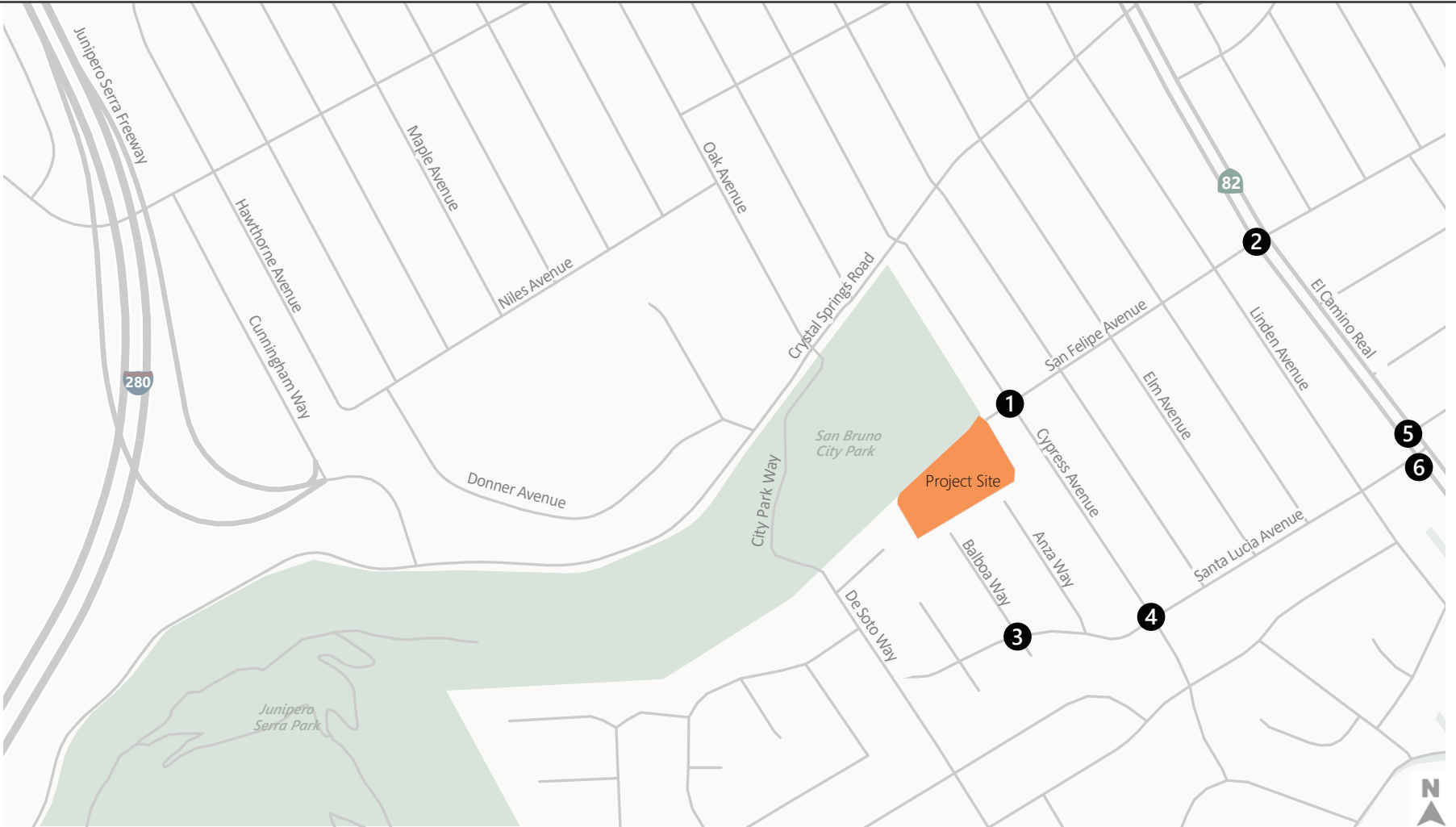
- San Felipe Avenue / Cypress Avenue
- San Felipe Avenue / El Camino Real
- Santa Lucia Avenue / Balboa Way
- Santa Lucia Avenue / Cypress Avenue
- Santa Dominga Avenue / El Camino Real
- Santa Lucia Avenue (west) / El Camino Real

The project site and study locations are shown in Figure 4.17-3. Existing lane configurations and traffic volumes for these six intersections are shown in Figure 4.17-4.

To determine the effect of the project on intersection LOS, project vehicle volumes obtained during the VMT analysis were assigned to the local roadway network and individual intersection turning movement volumes based on trip distribution calculations.

Site Circulation and Access

Project circulation and access was evaluated by assessing the adequacy of the design of the drop-off/pick-up aisles and one-way flow of traffic from Balboa Way to San Felipe Avenue. The scope of review for site circulation included required pedestrian facilities, street throat depths, student drop-off circulation, and parking location and design. Access to the project site via pedestrian, bicycling, and existing and future transit stops was also considered. As part of the analysis of the project's compliance with City standards, an evaluation of the project's proposed vehicle and bicycle parking supply was conducted.



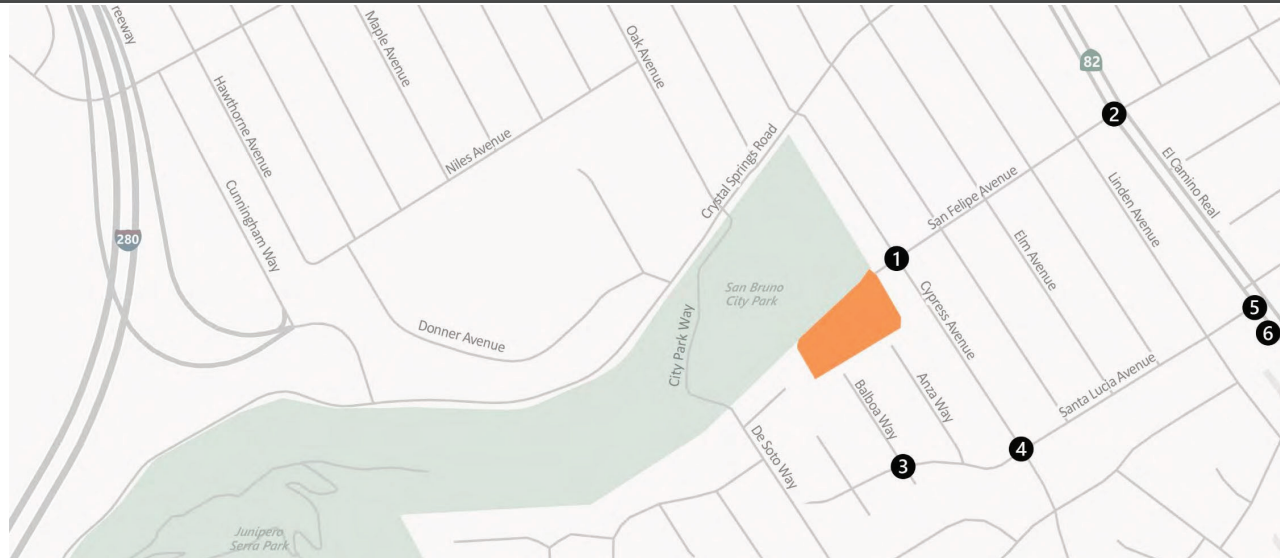
LEGEND

- Project Site
- Study Intersection

Source: Fehr & Peers

PROJECT SITE AND STUDY LOCATIONS

FIGURE 4.17-3



<div>1. Cypress Avenue/San Felipe Avenue</div> <div><p>Cypress Avenue</p><p>San Felipe Avenue</p></div>	<div>2. El Camino Real/San Felipe Avenue</div> <div><p>El Camino Real</p><p>San Felipe Avenue</p></div>	<div>3. Balboa Way/Santa Lucia Avenue</div> <div><p>Balboa Way</p><p>Santa Lucia Avenue</p></div>	<div>4. Cypress Avenue/Santa Lucia Avenue</div> <div><p>Cypress Avenue</p><p>Santa Lucia Avenue</p></div>
<div>5. El Camino Real/Santa Dominga Ave</div> <div><p>El Camino Real</p></div>	<div>6. El Camino Real/Santa Lucia Avenue</div> <div><p>El Camino Real</p><p>Santa Lucia Avenue</p></div>	<div>LEGEND</div> <div><div>#</div>Study Intersection</div> <div><div>AM (MD)</div>Peak Hour Traffic Volume</div> <div><div></div>Lane Configuration</div> <div><div>stop</div>Stop Sign</div> <div><div></div>Signalized</div>	

Source: Fehr & Peers

EXISTING LANE CONFIGURATIONS AND VEHICLE VOLUMES

FIGURE 4.17-4

4.17.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
1) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle lanes, and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible 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 type="checkbox"/>	<input checked="" type="checkbox"/>

4.17.2.1 *Project Impacts*

The City has traditionally used level of service or LOS (i.e. vehicle delay or congestion) as the basis for determining a project's traffic impacts. Per General Plan Policy T-B noted below, the LOS effects of the project are evaluated against the following criteria to determine whether the increased delay is significant. However, with the passage of SB 743 and the adoption of related Guidelines implementing SB 743, the City's approach to evaluating project traffic impacts under CEQA must change. SB 743, amending state law (CEQA), takes precedence over the City's General Plan, and now requires that LOS no longer be used, and that as of December 28, 2018, LOS traffic impacts (i.e. increased vehicle delay) are required to be considered insignificant (CA PRC 21099(b)(2)). Accordingly, the discussion that follows presents the degree to which the project's trips will comply with City General Plan Policy T-B or contribute to substantial additional delay, and whether roadway improvements are available to reduce the delay and restore acceptable levels of service. The relevant question under CEQA, as amended by SB 743, is whether any physical roadway improvements required of a project to maintain or restore acceptable LOS conditions would have negative environmental consequences from construction or operation of the modified roadway.

Trip Generation, Distribution, and Assignment

The magnitude of 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, the magnitude of 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 and intersections.

Trip Generation

Trip generation rates were determined using the Institute of Transportation Engineers (ITE) Trip Generation Manual, 10th Edition. The ITE rate for “Day Care Center” is used for Pre-K students and the ITE rate for “Private School K-8” is used for Kindergarten students. The trip generation rates documented for these ITE land use categories were qualitatively confirmed by Fehr & Peers’ field visit at Stratford School’s Crestmoor Canyon campus, which enrolls both Pre-K and Kindergarten populations.⁷⁷

ITE rates for schools are based on the number of students enrolled. However, they also account for trips made by teachers, staff, visitors, and delivery vehicles. The project proposes 288 Pre-K and 60 Kindergarten students. Not all students are on campus at the same time, however. Families may enroll in a morning-only, afternoon-only, or full day program. ‘Extended Care’ options are also available for families that need to bring their children before the morning session begins or pick them up after the afternoon session ends. Extended Care is available to students enrolled in both full-day and half-day programs. The anticipated project enrollment is included in Table 4.17-4 and expected student arrivals and departures are shown graphically over the course of a typical day in Figure 4.17-5.

Table 4.17-4: Project Enrollment by Program					
Student Group	Morning Only	Afternoon Only	Full Day	Total	Extended Care
<i>Pre-K</i>	48	24	216	288	100
<i>Kindergarten</i>	0	0	60	60	20
Source: Stratford School, Inc.					

Vehicle trip generation estimates for the project are therefore based on the expected enrollment and student arrival/departure activity during each period of the day (AM period, afternoon⁷⁸, and PM⁷⁹ period). Vehicle trip generation results are presented in Table 4.17-5 on the following page.

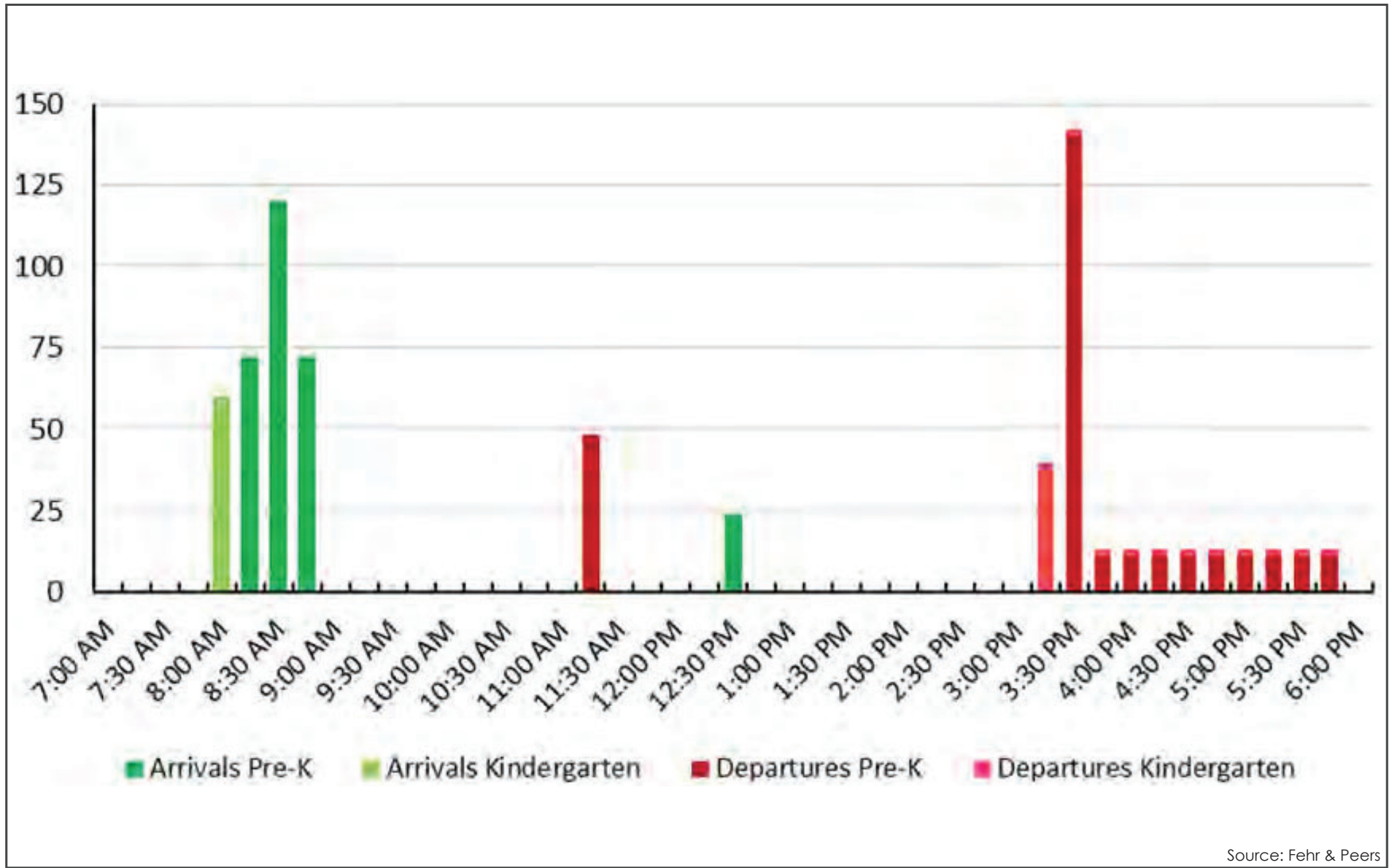
It is important to note that every pick-up or drop-off event at the project would generate two vehicle trips – one entering the site and one leaving the site – which results in four vehicle trips per student per day for a student who arrives by private vehicle. Vehicle trip generation also considers the effect of carpooling and staff who drive to campus.

⁷⁷ Crestmoor Canyon Stratford School field visit was completed on October 24, 2019.

⁷⁸ Afternoon school pick up is between 2:00 and 4:00 pm.

⁷⁹ PM peak period is between 4:00 to 6:00 pm.

Table 4.17-5: Project Vehicle Trip Generation by Time of Day								
Land Use – ITE (Project)	ITE Code	Students			Vehicle Trips			
		AM	Afternoon	PM	Daily	AM Peak Hour	Afternoon²	PM Peak Hour¹
<i>Day-Care Center (Pre- K)</i>	565	264	240	100 ³	1,073	183	142	73
<i>Private School K-8 (Kindergarten)</i>	534	60	60	60	247	73	36	16
Total Trip Generation					1,319	256	178	89
<p>Sources: Fehr & Peers; ITE <i>Trip Generation Manual</i>, 10th Edition.</p> <p>¹ Calculated using the ITE rate for peak hour of adjacent street traffic.</p> <p>² Calculated using the ITE rate for peak hour of generator.</p> <p>³ The ITE Day Care rate assumes a later pick-up time than presented for Pre-K in the Project description provided by the Project sponsor. For this reason, the PM Pre-K enrollment is adjusted to reflect only Pre-K students enrolled in Extended Care. The ITE Private School (K-8) rate assumes the same pick-up time as presented for Kindergarten in the Project Description. For this reason, the PM Kindergarten enrollment is listed as the full enrollment value. If the pick-up schedule in the Project description were to shift to a later time, the PM Peak Hour vehicle trip generation would increase.</p>								



Source: Fehr & Peers

PROJECT ENROLLMENT ARRIVAL AND DEPARTURE SCHEDULE

FIGURE 4.17-5

Trip Distribution

Trip distribution is based on expected student and teacher home zip code data provided by Stratford School. The zip code distribution is based on the home locations of existing students and teachers at Stratford School's Crestmoor Canyon campus, some of whom will transfer to the City Park campus (proposed project) when it is complete and serves as a proxy for the Project. This zip code distribution is expected to be similar for future years of operation.

Home zip codes and shortest-travel time calculations in Google Maps were used to determine overall trip distribution patterns for the project site. The results are illustrated in Figure 4.17-6 on the next page. As illustrated, most trips will enter and depart the project site via El Camino Real, which provides access to local neighborhoods as well as to more regional locations via US-101. Approximately 30 percent of trips will access and depart the project site and surrounding neighborhood via I-280 and Crystal Springs Avenue. The remaining trips will use local streets to access home locations that are within a mile of the project site.

Impact TRN-1: The project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle lanes, and pedestrian facilities. **(Less than Significant Impact)**

Potential Conflict with the General Plan

The San Bruno General Plan, through “Transportation Policy T-B,” requires the City to maintain acceptable levels of service for vehicular movement along the city’s street network. In order to evaluate this policy, the City uses the LOS metric which is a qualitative description of driver comfort and convenience (refer to Table 4.17-1). The General Plan establishes LOS for specific intersections listed in the Transportation Element, but does not establish citywide LOS standards. LOS D is required to be maintained for the El Camino Real/San Felipe Avenue intersection. For the purposes of this analysis, acceptable LOS will be defined as LOS D for both signalized and unsignalized intersections. At unsignalized intersections, LOS is defined by the intersection approach that operates the “worst” rather than overall, average intersection LOS, which is the standard for signalized intersections. Descriptions of levels of service for signalized intersections, together with their corresponding volume-to-capacity ratios (V/Cs), are presented in Table 4.17-2. Table 4.17.3 presents Level of Service definitions for unsignalized intersections.

However, in accordance with CEQA Guidelines Section 15064.3(a) level of service can no longer be used as a metric to identify traffic impacts under CEQA. Therefore, the project traffic impacts related to the City’s General Plan are considered less than significant, and the relevant question for CEQA is whether the project would be required to improve or modify an intersection or roadway to bring project traffic into conformance with General Plan Policy T-B, which would represent a physical change to the environment associated with the project requiring analysis under CEQA.

The project’s effects on intersection levels of service are discussed in a separate General Plan Conformance Transportation Analysis report, which indicate no physical roadway improvements are needed to bring the project’s traffic into conformance with General Plan Policy T-B.

Pedestrian Facilities

A significant impact to pedestrian facilities would occur if the project would not provide or eliminate access, conflict with existing or planned pedestrian facilities, or would create hazardous conditions for pedestrians. Pedestrian conditions on surrounding streets are not expected to change substantially with the project. No improvements are proposed for surrounding streets or intersections, however, parts of the pathway surrounding the project site will be repaved as part of project construction. The Transportation Impact Analysis determined that this pathway is expected to experience much heavier pedestrian foot traffic once the project begins operating. To accommodate this increased demand, the following Improvement Measure will be required.

Improvement Measure:

- Pavement quality of the paths circulating the perimeter of the project site shall be improved to the greatest extent possible, including the repairing of cracks and the smoothing of bumps present in the existing walkways.

With implementation of the above measure, the project would not have a significant impact on pedestrian access and the conditions on surrounding streets. This minor pavement enhancement and repair will require minimal work and not cause any substantial impacts, as such work would normally fall within CEQA Guidelines Categorical Exemption Class 15301(c) Existing Facilities.

Bicycle Facilities

A significant impact on bicycle facilities would occur if the project would not provide or eliminate bicycle access, conflict with existing or planned facilities, or created hazardous conditions for bicyclists. The proposed bicycle facilities described below would enhance bicycle access, and as redevelopment of the project site would be limited to the parcel boundaries, the facilities shown in Figure 4.17-2 would not be impacted. The transportation demand management measures described below, and the vehicle queuing measures included under Impact TRN-3, would ensure that no hazardous conditions for bicyclists are created.

Section 12.100.050 of the City of San Bruno *Zoning Code Parking Ordinance* (effective March 26, 2020) does not include bicycle parking requirements for daycare centers, and the adequacy of bicycle parking provided is determined by the Community and Economic Development Director. The project would not result in a significant impact on bicycle facilities in the City.

Transit Facilities

Existing regional and local transit services are provided by SamTrans. SamTrans' ECR bus route, which provides connections to BART and Caltrain stations, has stops located on El Camino Real and San Felipe Avenue within a 5-minute walk of the project site.

A significant impact on transit services would occur if the project generated a substantial increase in transit riders that could not be adequately served, or if the project conflicted with transit facilities. Neither public transit conditions nor public transit access are expected to change with the project. The project could generate a small number of peak hour transit trips, likely associated with staff commutes, which could be accommodated by existing nearby transit routes and services including SamTrans, Caltrain, and BART. As there would be no physical changes to existing facilities and only a minor increase in transit trips, transit facilities would not be significantly impacted.

Impact TRN-2:	The project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). (Less than Significant Impact)
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VMT Threshold

This question pertains specifically to VMT as the means of analyzing transportation impacts of a project. Per CEQA Guidelines Section 15064.3(c), agencies can wait as late as July 1, 2020 to adopt a VMT policy. The City of San Bruno has not yet adopted a VMT policy. Therefore, the most appropriate approach for assessing VMT is to apply a project-specific methodology and threshold based on the project's trip distribution data and geographic location. Working within OPR's assumption that most schools are local serving and reduce VMT, the VMT threshold for this project was determined to be the current San Mateo County average school-based VMT for students in Pre-

K and Kindergarten. Therefore, the project would result in less-than-significant VMT impacts if the project VMT is equal to or less than the San Mateo County average school-based VMT for students in Pre-K and Kindergarten.

Project-Generated VMT

VMT for the project was calculated by multiplying the daily trip generation associated with the project by the average trip length for students and teachers.⁸⁰ Average trip length is based on the home zip code data provided for current students and teachers at Stratford School's existing Crestmoor Canyon campus, as it is anticipated that future students and teachers would come from the same general catchment area. Trip lengths are then weighted by the number of students and/or teachers traveling from each home zip-code. For this analysis, VMT is evaluated for the sum of daily weekday trips associated with the project. This can be reported as total VMT or as an efficiency metric such as VMT per capita. VMT analysis results are presented in Table 4.17-8 below for both total daily VMT and average VMT per student (a per capita metric).

Table 4.17-8: Daily and Per Capita Project VMT					
Land Use – ITE (Project)	Daily Enrollment	Daily Trip Generation	Average Trip Length	Daily Total VMT	Average Daily VMT / Student
<i>Day Care Center (Pre-K)</i>	288	1,073	Approximately 5.3 miles	5,727	20.2
<i>Private School K-8 (Kindergarten)</i>	60	247		1,317	
Total	348	1,320	--	7,044	--

VMT Impact Analysis

In order to determine whether the project results in VMT impacts, it was necessary to calculate and compare against the current San Mateo County average school-based VMT for students in Pre-K and Kindergarten. Results from the California Household Travel Survey (CHTS) were used to calculate average trip length (in miles) for school trips for Pre-K and Kindergarten-aged children. Since trip generation rates are expected to be consistent on a per student basis across the county, the relevant comparison variable for student VMT is trip length. Table 4.17-9 below presents the average one-way trip length for the project as compared to the county average.

⁸⁰ Another approach explored to calculate Project VMT was using the City/County Association of Governments of San Mateo (CCAG) Travel Demand Model; however, it was determined that this model is not sensitive enough to accurately reflect the difference in total countywide VMT related to a project of this size.

Table 4.17-9: Average Pre-K and Kindergarten School Trip Length		
Data Source	Average One-Way Vehicle Trip Length (Home-to-School)	Methodology Notes
<i>Project: Crestmoor Canyon Stratford School Home Zip Code Data</i>	5.3 miles	Represents current enrollment of Pre-K and K students at Stratford's Crestmoor Canyon campus
<i>San Mateo County: CHTS (2010 – 2012)</i>	5.6 miles	Represents all home-to-school vehicle trips for families with children ages 3-4 or 5-14 (weighted to match Stratford San Bruno City Park's Pre-K vs. K enrollment split) with at least one trip end in San Mateo County

This comparison reveals that the project trip length, and therefore, the project VMT per capita is expected to be slightly lower than the San Mateo County average. Therefore, the project is expected to have a less-than-significant impact on VMT. However, it is important to note that the average trip distance for the project is close to the County average (less than 0.5 mile difference) and that in any given year the average trip-distance for enrolled students may be slightly shorter or longer than what has been estimated (based on zip-code data for students currently enrolled at Stratford School's Crestmoor Canyon campus). For this reason, the Stratford School San Bruno City Park Campus would be required to implement a travel demand management (TDM) program, described in the following section, as an Improvement Measure to further reduce overall VMT.

Improvement Measures:

TDM is a combination of services, incentives, facilities, and actions that reduce single-occupant vehicle trips to help relieve traffic congestion, parking demand, and air pollution. The purpose of a TDM Program is to propose trip reduction strategies with the goal of reducing overall vehicular trip making activity in the area. Stratford School shall submit an annual report to the City of San Bruno summarizing the number of families and staff participating in each of the programs listed below in order to monitor their TDM efforts.

- School Pool Program (families and staff) – provide an online carpool portal, bulletin board, and/or face-to-face meetings to connect parents and staff with adjacent home locations. Carpooling will reduce overall vehicle trips by both reducing school-related vehicle trips, and by freeing parents to take alternative modes for their work commutes.
- Transit and Biking Subsidy Program (staff only) – subsidizing transit and biking encourages teachers and staff to explore alternatives to driving to work. These subsidies can be provided in the form of pre-tax benefits or direct deposits onto an employee's transit card or into their bank account. These subsidies offset the cost of transit fares and

bike maintenance and provide a financial incentive to commute using an alternative to driving to reduce overall vehicle trips.

- Emergency Ride Home Program (staff only) – register for San Mateo County’s free Emergency Ride Home Program. Once registered, any Stratford employee who works in San Mateo County may use the program. If an employee uses an alternative form of transportation to get to work, they are eligible for a free ride home in case of a personal emergency.

Implementation of the above Improvement Measure would further reduce overall VMT, thus ensuring the project’s VMT impact is 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)**

No geometric design changes to the surrounding roadway network are proposed. Since project-generated increases in traffic volume would not substantially reduce intersection LOS, these intersections would continue to perform at acceptable levels and therefore would not be dangerous.

Portions of the existing paved play area would be converted into a new 83-space surface parking lot, which vehicles would enter from Balboa Way and exit onto San Felipe Avenue. An additional 29-space staff parking area with ingress and egress via Anza Way would supplant the demolished secondary structures. As discussed under Impact HAZ-6, the geometric dimensions of the proposed development meet the San Bruno Fire Department standards regarding lane widths, vertical clearance, and turning radii coverage. Sight distances for vehicles exiting onto San Felipe Avenue would meet Caltrans stopping sight standards. Potential safety hazards to pedestrians posed by vehicle queuing on Balboa Way would be addressed by traffic monitoring and overflow parking.

Based on observed parking activity at Stratford’s Crestmoor Canyon campus and arrival and departure schedule, the proposed parking supply in the main lot off Balboa Way is expected to accommodate student pick-up and drop-off parking demand. The 29-space staff parking lot off Anza Way combined with surplus stalls in the main lot are expected to accommodate the parking demand generated by the anticipated 35 staff members. Therefore, no spillover parking is anticipated on the surrounding streets. The proposed parking supply exceeds the parking required by Section 12.100.030 of the City of San Bruno *Zoning Code Parking Ordinance* (effective March 26, 2020) which requires a minimum provision of two parking spaces per classroom. The project proposes 13 classrooms and over 100 parking spaces between the main lot and the staff lot.

The current design of the proposed loading zone in front of the Kindergarten play area can only accommodate one vehicle at a time. During the morning drop-off period between 8:00 and 8:15 AM, 60 vehicles transporting Kindergarten students are expected to arrive. Even if only one quarter of these vehicles arrives and/or is present at the same time, a vehicle queue is expected to form that would extend beyond the available queue space in the parking lot and back up onto Balboa Way. This could pose a safety hazard to pedestrians on Balboa Way and the pedestrian pathway surrounding the project site. To minimize the hazards associated with vehicle queuing, the following condition of approval would be required.

Improvement Measure:

- School staff will serve as traffic monitors and enforce strict time limits on dwell time in the drop-off zone during the pre-K and Kindergarten 15-minute drop-off periods. Once queue spillback approaches the limits of the parking lot, staff monitors will direct parents to park their vehicle and walk their child inside of the school instead of joining the vehicle queue.

As described above, there is surplus parking supply to accommodate parking during the morning drop-off and afternoon pick-up periods. This parking supply can accommodate overflow loading queues.

The proposed use of the project site as a preschool and kindergarten would be consistent with past uses at the site and would not substantially conflict with surrounding land uses. The project site has a General Plan land use designation of *Low-Density Residential* and is zoned *R-1, Single-Family Residential*, which, with a Conditional Use Permit, is compatible with school uses.

Based on the above discussion regarding the geometric dimensions of the proposed development and the compatibility of its proposed use, the project would not substantially increase hazards. **(Less than Significant Impact)**

Impact TRN-4: The project would not result in inadequate emergency access. **(No Impact)**

As discussed under Impact HAZ-6, the project would not impair or interfere with an adopted emergency response or evacuation plan. During construction and operation of the proposed project, streets, roadways, and trails would not be permanently blocked such that emergency vehicles would be unable to access the site or surrounding sites. In accordance with San Bruno Fire Department requirements, the project is within 150 feet of a fire apparatus access road. Emergency vehicles would be able to access the project site via the surrounding roadways (Anza Way, Balboa Way, San Felipe Avenue). Driveways and drive aisles are at least 20 feet wide with a vertical clearance greater than 13.6 feet, allow 150-degree radii coverage, are fully paved, and capable of supporting 34 tons in weight as required by the San Bruno Fire Department. Emergency access would not be inhibited by the proposed project. **(No Impact)**

4.18 TRIBAL CULTURAL RESOURCES

4.18.1 Environmental Setting

4.18.1.1 *Regulatory Framework*

State

Assembly Bill 52

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

Under AB 52, TCRs are defined as follows:

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

Regional and Local

City of San Bruno General Plan

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

Policies	Description
ERC-39	Continue to protect archaeological sites and resources from damage. Require that areas found to contain significant indigenous artifacts be examined by a qualified archaeologist for recommendations concerning protection and preservation.

4.18.1.2 *Existing Conditions*

The project site has been previously developed and is surrounded by existing developments. Since Native Americans at the time of Euro-American contact tended to live along the alluvial terraces and along historic Bay margins, potential exists for the discovery of Native American cultural resources within the city as the project is located in the San Francisco Bay Area, and is in the vicinity of the Crystal Springs Creek and San Andreas Reservoir. The City of San Bruno has not received any requests for notification and consultation from Native American tribes pursuant to AB 52.

4.18.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
1) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?	<input type="checkbox"/>	<input 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 the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<hr/>				
Impact TCR-1:	The project would not cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k). (Less than Significant Impact with Mitigation Incorporated)			
<hr/>				
Impact TCR-2:	The project would not cause a substantial adverse change in the significance of a tribal cultural resource that is determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. (Less than Significant Impact with Mitigation Incorporated)			

No Native American tribes have formally requested to be put on the City's notification list for projects undergoing review pursuant to AB 52, and no known tribal cultural resources are associated with the project site at this time. However, since the time of Euro-American contact, Native Americans in the Bay Area have typically lived along the alluvial terraces and along historic bay margins. Because of San Bruno's location along the San Francisco Bay, potential exists for identifying Native American cultural resources within the city. Since the project site has been previously disturbed and extensively developed with the former El Crystal Elementary School, there is a low possibility for uncovering buried objects with tribal cultural value. Project-related grading and excavation during construction could however result in significant impacts, if any unknown

buried resources were discovered. In the event that an inadvertent discovery of a tribal cultural resource is made, mitigation measures MM CUL-2.1 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)**

4.19 UTILITIES AND SERVICE SYSTEMS

4.19.1 Environmental Setting

4.19.1.1 *Regulatory Framework*

State

Assembly Bill 939

The California Integrated Waste Management Act of 1989, or AB 939, established the Integrated Waste Management Board, required the implementation of integrated waste management plans, and mandated that local jurisdictions divert at least 50 percent of solid waste generated (from 1990 levels), beginning January 1, 2000, and divert at least 75 percent by 2010. Projects that would have an adverse effect on waste diversion goals are required to include waste diversion mitigation measures.

Assembly Bill 341

AB 341 sets forth the requirements of the statewide mandatory commercial recycling program. Businesses that generate four or more cubic yards of garbage per week and multi-family dwellings with five or more units in California are required to recycle. AB 341 sets a statewide goal for 75 percent disposal reduction by the year 2020.

Senate Bill 1383

SB 1383 establishes targets to achieve a 50 percent reduction in the level of the statewide disposal of organic waste from the 2014 level by 2020 and a 75 percent reduction by 2025. The bill grants CalRecycle the regulatory authority required to achieve the organic waste disposal reduction targets and establishes an additional target that at least 20 percent of currently disposed edible food is recovered for human consumption by 2025.

California Green Building Standards Code

In January 2010, the State of California adopted the California Green Building Standards Code, establishing mandatory green building standards for all buildings in California. A recent update of these standards was published in July 2019 and went into effect on January 1, 2020. The code covers five categories: planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and indoor environmental quality. These standards include the following mandatory set of measures, as well as more rigorous voluntary guidelines, for new construction projects to achieve specific green building performance levels:

- Reducing indoor water use by 20 percent;
- Reducing wastewater by 20 percent;
- Recycling and/or salvaging 50 percent of nonhazardous construction and demolition debris; and
- Providing readily accessible areas for recycling by occupants.

Regional and Local

City of San Bruno General Plan

Various policies in the City's General Plan have been adopted for the purpose of avoiding or mitigating impacts on utilities and service systems resulting from planned development within the City including the following:

Policies	Description
PFS-C	Ensure that the City's water supply systems are adequate to serve the city's present and anticipated needs, and that water conservation is implemented in all residences and businesses.
PFS-D	Ensure that the City's wastewater collection and treatment systems are adequate to serve the city's present and anticipated needs, are safe, and are environmentally sound.
PFS-E	Ensure that the City's solid waste collection agency provides clean and convenient garbage and recycling service.
PFS-8	Require expansion of the City's water distribution system proportionate with new development's fair share of demand.
PFS-9	Upgrade the water distribution system as necessary to provide adequate water pressure to meet fire safety standards and to respond to emergency peak water supply needs.
PFS-17	Ensure that new or expanded water supply and transmission facilities are constructed in a manner in which construction and operation impacts are minimized or avoided.
PFS-20	Require expansion of the City's sewer collection system proportionate with new development's fair share of demand.
PFS-21	Upgrade or replace sewer lines to accommodate anticipated flows and to prevent overflows. Upgrade sewer lift stations as needed.
PFS-31	Ensure adequate fire water pressure as a condition of approval for all new development projects.
PFS-72	Work with utility providers to ensure that adequate electrical and natural gas facilities and services are available to meet the demands of existing and future development.
PFS-73	Provide for utility access and prevent easement encroachments that might impair the safe and reliable maintenance and operation of utility facilities.

City of San Bruno Water Master Plan / Urban Water Management Plan

To meet existing and future water demands, the City of San Bruno has developed a *Water System Master Plan* which provides strategies for maintaining and improving water system performance and guiding capital expenditures for the City's water system. As San Bruno supplies approximately 3.14 million gallons per day (MGD) (equivalent to 3,512 AFA of potable water to 11,425 water customers located within its service area, it is also required by the Urban Water Management Planning Act to submit an Urban Water Management Plan. San Bruno's 2015 Urban Water Management Plan describes the City's water system, historical and projected water use, water supply sources, and a comparison of projected water supply to water demands during normal, single-dry, and multiple-dry years in five-year increments from 2020 to 2040. The City's 2015 and 2020 water use targets, compliance with the interim 2015 per capita water use target, and implementation plan for meeting the City's final 2020 per capita water use target are outlined as well.

City of San Bruno Sanitary Sewer Management Plan / Sewer Master Plan

Two documents govern San Bruno's sewer systems, the 1), *City of San Bruno Sewer Master Plan*, dated February 2014, and; 2) *City of San Bruno Sewer System Management Plan*, dated October

2019. The February 2014 Sewer Master Plan was a legally mandated update to the 2000 Master Plan, and provides a sewer system condition assessment, a Capacity Assurance Plan, and a long-range Capital Improvement Program for the City's sewer system. The Sewer System Management Plan complements the Sewer Master Plan by providing policies, procedures, and activities related to the planning, management, operation, and maintenance of the City's sanitary sewer system.

City of San Bruno Storm Drain Master Plan

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

4.19.1.2 *Existing Conditions*

Water Service

Water service to the project site comes from four local wells that draw water from a deep aquifer—Westside Groundwater Basin—located between 250 feet and 500 feet below ground surface, and from water purchased by San Bruno from the San Francisco Public Utilities Commission (SFPUC) originating from the Hetch Hetchy system in the Sierra Nevada Mountains. The City's service area, which is approximately 5.5 square miles, includes 11 pressure zones and is served by approximately 120 miles of distribution pipelines, five surface water supply turnouts, four active groundwater wells, eight storage tanks, eight booster pump station, and 26 pressure regulating stations.⁸¹

The City of San Bruno uses approximately 4.2 million gallons of water per day (mgd). Per capita consumption averages approximately 75 gallons per day (gpd) in the wet season and 125 gpd in dry weather. According to the Public Work's Department, San Bruno has adequate water storage capacity to meet current demands. Based on potential buildout of the General Plan Land Use Diagram, San Bruno could add approximately 647 new housing units and 1.7 million square feet worth of non-residential building area by 2025. Assuming 75 gpd per capita during the wet season and 125 gpd per capita during the dry season, water demand in San Bruno could increase by 141,276 to 235,459 gpd by year 2025. This would bring the city's total 2025 demand to between 4.5–4.7 mgd of domestic water supply, an increase of seven to twelve percent over existing levels. Two projects in the Department's 10-Year Plan will increase storage capacity 25 to 30 percent, which will be adequate to accommodate future population growth.⁸²

Existing water lines are located on Balboa Way, Anza Way, and San Felipe Avenue, and in the easement bordering San Bruno City Park and the subject site.⁸³

⁸¹ City of San Bruno. *Water System Master Plan*. November 2012.

⁸² City of San Bruno. *San Bruno General Plan*. March 2009

⁸³ City of San Bruno. *Water System Master Plan*. November 2012.

Sanitary Sewer/Wastewater Treatment

The Public Works Department's Wastewater Division is responsible for the wastewater collection system in San Bruno, which consists of approximately 90 miles of pipeline and six lift stations. Currently, 2.8 mgd of effluent goes to the South San Francisco-San Bruno Water Quality Control Plant (SSF/SB WQCP) treatment plant that the City of San Bruno owns jointly with the City of South San Francisco. Buildout of the General Plan would result in an increase of approximately 105,400 gpd of wastewater created. Together with existing and pending flows, the city's 2025 flows are projected at 3.1 mgd of wastewater, which is still only a third of plant dry season capacity.

The City is subject to infiltration and inflow of extraneous groundwater and stormwater into the sanitary sewer system, resulting in high wet weather flows during storm events. As a result, sanitary sewer overflows (SSOs) have occurred at several locations in the system during large storms. SSOs in dry weather also occur due to pipe blockages from debris, roots, and grease. Furthermore, the average age of the sewer system is more than 60 years, with a substantial portion over 80 years. In some areas of the system, conditions such as flat pipe slopes and difficult access present difficult challenges for the City's operation and maintenance crews. In 2014, the capacity of the sewer system was assessed using a hydraulic model, which identified gravity pipeline capacity deficiencies in a number of areas of the sewer system, including the Crystal Springs Road system.⁸⁴

Existing sewer mains are located on Balboa Way, Anza Way, San Felipe Avenue, and along the subject site's southwest easement.

Storm Drainage

San Bruno's Public Works Department Streets and Stormwater Division operates and maintains the storm drainage system in the City. The City of San Bruno contains six watersheds that drain the city. The city's primary drainage basins—Crystal Springs Creek, Huntington Creek, and San Bruno Creek—encompass 80 percent of San Bruno's land area. The subject site is within the Crystal Springs Creek watershed.

Currently, the project site is 65 percent impervious and 35 percent pervious (85,336 square feet and 45,373 square feet, respectively). Existing storm drains on-site connect to a larger system of storm drains that collects and channels surface water (mostly from rainfall) into a series of pipes, trenches, culverts, detention basins, and open channels, managed by the San Mateo Flood Control District, which transport and empty it into San Francisco Bay. The system is based upon the natural drainage pattern determined by topography. Because of the high relief (steep slopes) in the western third of San Bruno and the more gradual eastward slope east of I-280, a gravity-flow system is used. Two pump stations are critical to the movement of stormwater in this District; one at Angus Avenue and one at Walnut Street. The discharge point for these watersheds is the San Bruno Channel, maintained by the Flood Control District, located next to the South San Francisco-San Bruno Water Quality Control Plant just north of SFO.

⁸⁴ City of San Bruno. *City of San Bruno Sewer Master Plan*. February 2014.

Solid Waste

San Bruno Garbage Company (SBGC), provides solid waste disposal services to the City. Garbage is taken to SBGC's transfer station, where recyclable materials and refuse are processed, sorted, and loaded into long-haul trucks for transfer to recycling facilities or the Ox Mountain Landfill. The Ox Mountain landfill is permitted by the California Integrated Waste Management Board to receive 3,598 tons per day or 1.3 million tons per year. The landfill's maximum capacity is 60.5 million cubic yards, with an estimated closure year of 2034.⁸⁵ The remaining capacity at this facility is 22,180,000 cubic yards.⁸⁶ Since 1995, San Bruno has deposited between 42,000 and 49,000 tons of waste at the Ox Mountain Landfill each year. Buildout of land uses according to the General Plan would result in an additional 23,901 pounds per day, or 4,362 tons per year, of solid waste. The city's total 2025 waste stream is projected at 44,654 tons per year. These solid waste projections are within the City's historical disposal tonnage to Ox Mountain Landfill.⁸⁷

4.19.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
1) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2) Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3) Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

⁸⁵ CalRecycle. Solid Waste Facility Permit – Corinda Los Trancos Landfill (Ox Mountain). April 12, 2017. <https://www2.calrecycle.ca.gov/PublicNotices/Details/2078>

⁸⁶ California's Department of Resources Recycling and Recovery (CalRecycle). SWIS Facility Detail: Corinda Los Trancos Landfill (Ox Mtn) (41-AA-0002). Date accessed February 24, 2020. <https://www2.calrecycle.ca.gov/SWFacilities/Directory/41-AA-0002/Detail/>

⁸⁷ City of San Bruno. *San Bruno General Plan Draft Environmental Impact Report*. December 2008.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
5) Be noncompliant with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Impact UTL-1: The project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. **(Less than Significant Impact)**

Water Facilities

The project would connect to existing water mains and lateral connections running from San Felipe Avenue. As discussed in Impact UTL-2, the proposed development's water demand is not a substantial increase compared with the water demand of the former El Crystal Elementary School and is accounted for in the San Bruno General Plan. As such, no new or expanded water facilities are required. **(Less than Significant Impact)**

Wastewater Treatment Facilities

Wastewater generated by the project would be handled by South San Francisco-San Bruno Water Quality Control Plant (SSF/SB WQCP) treatment plant. As discussed under Impact UTL-1, Existing sewer mains and lateral connections as described under Existing Conditions would handle disposal of wastewater produced by the project. As covered below in Impact UTL-3, the City is currently expanding the capacity of the Crystal Springs Road system that will service the proposed development. When completed, the Crystal Springs Road system will have adequate capacity to serve the project's anticipated wastewater flows. More broadly, San Bruno's existing and pending wastewater flows during dry season will form only a third of total plant capacity as of 2025. No additional wastewater facilities are proposed or required to accommodate the proposed development's incremental increase in wastewater production. **(Less than Significant Impact)**

Stormwater Drainage Facilities

As discussed in Impact HYD-1, the proposed project would marginally reduce the level of stormwater runoff generated at the site. Despite adding 10,400 square feet of impervious surface, the project's bioretention areas would treat an additional 14,464 square feet of impervious surface compared to existing conditions. As discussed in Section 4.10, Hydrology and Water Quality, implementation of MRP-mandated treatment controls would provide reductions in the rate and volume of post-construction stormwater runoff discharged to the public storm drain system. Additionally, the project would install approximately 200 linear feet of six-inch and 10-inch storm drain that would connect to the existing storm drain network on-site, which would assist in capturing the additional runoff generated by new impervious surfaces and buildings. The construction of new

storm drainage infrastructure would occur during grading and would not significantly impact the environment. **(Less than Significant Impact)**

Electric Power, Natural Gas, & Telecommunication Facilities

The project would connect to existing electric utility, natural gas, and telecommunication facilities within the project area. The project would not result in the relocation or construction of new electrical, natural gas, or telecommunication facilities. Construction of lateral connections between building additions and existing utility lines would occur during grading and would not result in significant environmental effects. **(Less than Significant Impact)**

Impact UTL-2: The project would not have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years. **(Less than Significant Impact)**

San Bruno's yearly water supply is approximately 4,075 acre-feet⁸⁸, or 1,327,850,750 gallons.⁸⁹ The San Bruno General Plan estimated that the City's water supplies could support approximately 647 new housing units and 1.7 million square feet worth of non-residential building area by 2025.

The water demand for the proposed development was estimated using water demand rates for an "Elementary School" land use.⁹⁰ The proposed 22,065-square foot Stratford School would have a water demand of approximately 6,260 gpd. Based on San Bruno General Plan projections above, there are sufficient water supplies available to support the increased water demand generated by the proposed development. In addition, the proposed project would be required to comply with the City's Water Conservation Plan outlined in the City's Municipal Code (SBMC §10.16), Demand Management Measures prescribed in the City's Urban Water Management Plan, and CalGreen's building standards. Adherence to these ordinances and measures would prevent excessive use of water and ensure the proposed project incorporates water saving measures into its building design. Therefore, the proposed project would not significantly impact water supplies. **(Less than Significant Impact)**

Impact UTL-3: The project would not result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments. **(Less than Significant Impact)**

Wastewater flows produced by the proposed development would empty into the Crystal Springs Road system, which is currently undergoing a capital improvement project to improve capacity that will be completed before the Stratford School is operational.⁹¹ When completed, the Crystal Springs Road system will have adequate capacity to serve the project's anticipated wastewater flows.

⁸⁸ City of San Bruno. *Water System Master Plan*. November 2012.

⁸⁹ One acre-foot is equivalent to 325,850 gallons. 4,075 multiplied by 325,850 equals 1,327,838,750.

⁹⁰ California Emissions Estimator Model. Appendix D – Default Data Tables – Table 9.1 Water Use Rates. September 2016.

⁹¹ City of San Bruno. *Sewer System Management Plan*. October 2019.

Using indoor water demand rates for an “Elementary School” land use⁹², the proposed 22,065-square foot Stratford School would produce approximately 1,753 gallons of wastewater per day.⁹³ San Bruno is currently producing 2.8 million gallons per day (mgd) of wastewater. Comparatively, the incremental increase in effluent production generated by the proposed development would not exceed the capacity of the SSF/SB WQCP treatment plant, which is capable of treating 13 mgd during dry weather and 62 mgd during wet weather.⁹⁴ **(Less than Significant Impact)**

Impact UTL-4: The project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. **(Less than Significant Impact)**

Buildout under the General Plan would result in an additional 23,901 pounds per day, or 4,362 tons per year, of solid waste. The City’s total 2025 waste stream is projected at 44,654 tons per year. These solid waste projections are within the City’s historical disposal tonnage to Ox Mountain Landfill. Additionally, San Bruno’s waste diversion program, which includes composting, facility recovery, household hazardous waste, recycling, source reduction, special waste materials, and transformation, has met the State’s 50 percent requirement for waste diversion. The City expects to continue high levels of waste diversion through the year 2025.

Using solid waste disposal rates for an “Elementary School” land use, the proposed 22,065-square foot Stratford School would generate 28.68 tons of solid waste per year.⁹⁵ Comparatively, the incremental increase in solid waste produced by the proposed development would not generate solid waste in excess of the Ox Mountain Landfill’s remaining capacity (22,180,000 cubic yards) or impair San Bruno’s solid waste reduction goals. **(Less than Significant Impact)**

Impact UTL-5: The project would be compliant with federal, state, and local management and reduction statutes and regulations related to solid waste. **(Less than Significant Impact)**

In addition to the solid waste generated by operation of the proposed building, large amounts of construction waste would be generated during construction and demolition activities. At least 50 percent of this construction waste will be recycled, in compliance with the City’s Recycling and Diversion of Debris from Construction and Demolition Ordinance (Section 10.23 of the San Bruno Municipal Code). Implementation of recycling measures during the construction and post-construction phases of the project would contribute to the City’s compliance with the waste diversion requirements under state law. **(Less than Significant Impact)**

⁹² California Emissions Estimator Model. Appendix D – Default Data Tables – Table 9.1 Water Use Rates. September 2016.

⁹³ Based upon the CalEEMod standard estimate of wastewater comprising 85 percent of indoor water use.

⁹⁴ City of San Bruno. *San Bruno General Plan*. March 2009.

⁹⁵ California Emissions Estimator Model. Appendix D – Default Data Tables – Table 10.1 Solid Waste Disposal Rates. September 2016.

4.20 WILDFIRE

4.20.1 Environmental Setting

4.20.1.1 *Regulatory Framework*

State

Fire Hazard Severity Zones

CAL FIRE is required by law to map areas of significant fire hazards based on fuels, terrain, weather, and other relevant factors. Referred to as Fire Hazard Severity Zones (FHSZs), these maps influence how people construct buildings and protect property to reduce risk associated with wildland fires. FHSZs are divided into areas where the state has financial responsibility for wildland fire protection, known as state responsibility areas (SRAs), and areas where local governments have financial responsibility for wildland fire protection, known as local responsibility areas (LRAs). Homeowners living in an SRA are responsible for ensuring that their property is in compliance with California's building and fire codes. Only lands zoned for very high fire hazard are identified within LRAs.

California Fire Code Chapter 47

Chapter 47 of the California Fire Code sets requirements for wildland-urban interface fire areas that increase the ability of buildings to resist the intrusion of flame or burning embers being projected by a vegetation fire, in addition to systematically reducing conflagration losses through the use of performance and prescriptive requirements.

California Public Resources Code Section 4442 through 4431

The California Public Resources Code includes fire safety regulations that restrict the use of equipment that may produce a spark, flame, or fire; require the use of spark arrestors on construction equipment that uses an internal combustion engine; specify requirements for the safe use of gasoline-powered tools on forest-covered land, brush-covered land, or grass-covered land; and specify fire suppression equipment that must be provided onsite for various types of work in fire-prone areas. These regulations include the following:

- Earthmoving and portable equipment with internal combustion engines would be equipped with a spark arrestor to reduce the potential for igniting a wildland fire (Public Resources Code Section 4442);
- Appropriate fire suppression equipment would be maintained during the highest fire danger period, from April 1 to December 1 (Public Resources Code Section 4428);
- On days when a burning permit is required, flammable materials would be removed to a distance of 10 feet from any equipment that could produce a spark, fire, or flame, and the construction contractor would maintain appropriate fire suppression equipment (Public Resources Code Section 4427); and
- On days when a burning permit is required, portable tools powered by gasoline-fueled internal combustion engines would not be used within 25 feet of any flammable materials (Public Resources Code Section 4431).

California Code of Regulations Title 14

The California Board of Forestry and Fire Protection has adopted regulations, known as SRA Fire Safe Regulations, which apply basic wildland fire protection standards for building, construction, and development occurring in a SRA. The future design and construction of structures, subdivisions and developments in SRAs are required to provide for the basic emergency access and perimeter wildfire protection measures discussed in Title 14.

Fire Management Plans

CAL FIRE has developed an individual Unit Fire Management Plan for each of its 21 units and six contract counties. CAL FIRE has developed a strategic fire management plan for the San Mateo-Santa Cruz Unit, which covers the project area and addresses citizen and firefighter safety, watersheds and water, timber, wildlife and habitat (including rare and endangered species), unique areas (scenic, cultural, and historic), recreation, range, structures, and air quality. The plan includes stakeholder contributions and priorities and identifies strategic areas for pre-fire planning and fuel treatment as defined by the people who live and work with the local fire issues.

Regional and Local

City of San Bruno General Plan

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

Policies	Description
OSR-B	Recognize the balance between maintenance and preservation of open space uses and the potential for wildland fires and flooding.
OSR-33	Balance Fire preventions goals with the preservation of the mature tree stands along the city's scenic corridors, including Sneath Lane, Skyline Boulevard, I-280, and Crystal Springs Road, consistent with the Tree Preservation Ordinance and Ordinance 1284. Landscaping of public rights-of-way along these corridors should complement the natural state.
ERC-12	Balance the need for fire safety and invasive plant species management with new considerations along the city's scenic corridors. Encourage buildings to be locked outside of the tree's drip-line or 12 feet from the tree trunk, whichever is greater, and/or incorporating special techniques to minimize root damage, etc.
HS-1	Regulate development, including remodeling or structural rehabilitation, to assure adequate mitigation of safety hazards on sites having a history or threat of slope instability, erosion, subsidence, seismic dangers (including those resulting from liquefactions, ground failure, ground rupture), flooding, and/or fire hazards.
PFS-9	Upgrade the water distribution system as necessary to provide adequate water pressure to meet fire safety standards and to respond to emergency peak water supply needs.
PFS-30	Require installation and maintenance of fire protection measures in high-risk and urban-interface areas, including but not limited to: <ul style="list-style-type: none">• Proper siting, road and building clearances, and access;• Brush clearance (non-fire resistant landscaping 50 feet from structures);• Use of fire resistive materials (pressure-impregnated, fire resistive shingles or shakes);• Landscaping with fire resistive species; and• Installation of early warning systems (alarms and sprinklers).
PFS-31	Ensure adequate fire water pressure as a condition of approval for all new development projects.

Policies	Description
PFS-34	Identify and remove mature and/or diseased Eucalyptus trees in rights-of-way and other open areas, if they pose a fire hazard or other threat to health and safety.
PFS-39	Minimize risks to single-access residential neighborhoods by providing alternative access for fire and other emergency personnel.

4.20.1.2 *Existing Conditions*

San Bruno is located in a Local Responsibility Area (LRA) in the CAL FIRE *San Mateo – Santa Cruz* Administrative Unit and contains no very high fire hazard severity zones (VHFHSZs).⁹⁶

The greatest potential for fire hazards in the City of San Bruno occurs in designated Wildland Fire Hazard Areas near extensive natural vegetation, specifically Crestmoor Canyon, Junipero Serra County Park, and San Francisco Water Department’s Peninsula Watershed. Dense stands of eucalyptus trees within the Rollingwood and Crestmoor neighborhoods also pose fire hazard potential. Urban-interface hazard areas are developed areas near Wildland Fire Hazard Areas potentially at risk of damage should a wildland fire occur. In these areas, highly flammable vegetation mixed with steep topography and long, dry summers create potential for wildland fires.

4.20.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
1) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input 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"/>

⁹⁶ California Department of Forestry and Fire Protection. *Fire Hazard Severity Zone Viewer*. Date accessed January 10, 2020. <https://egis.fire.ca.gov/FHSZ/>

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

The project site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. Furthermore, the project site, while adjacent to the San Bruno City Park Wildland/Urban Interface Hazard Area, is mapped outside the City’s wildland fire hazard areas in the San Bruno General Plan. Accordingly, the project would not result in wildfire impacts. **(No Impact)**

4.21

MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
1) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact MFS-1: The project does not have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory. **(Less than Significant Impact with Mitigation Incorporated)**

As discussed in prior sections of this Initial Study, the proposed project would not degrade the quality of the environment, substantially affect biological resources, or eliminate important examples of California history or prehistory with implementation of the identified conditions of approval, best management practices, and mitigation measures. As discussed in Section 4.3, Air Quality, implementation of BAAQMD Best Management Practices and Mitigation Measure AIR-3.1, would reduce potentially significant impacts from fugitive dust and toxic air contaminants to a less than significant level. As discussed in Section 4.4, Biological Resources, implementing the recommendations of the arborist report and mitigation measures BIO-1.1 through BIO-1.3 would reduce impacts to biological resources to a less than significant level. As discussed in Section 4.5, Cultural Resources, with implementation of the mitigation measures (CUL-2.1 and CUL-3.1), the project would result in a less than significant impact on cultural and tribal cultural resources would

be. As discussed in Section 4.6, Geology and Soils, the project's potential effects on geology and soils would be reduced to less than significant with implementation of conditions of approval and mitigation measures GEO-6.1. As described in Section 4.9, Hazards and Hazardous Materials, impacts associated with exposure of construction workers and sensitive receptors to asbestos-containing materials and lead-based paint would be reduced to a less than significant level with implementation of mitigation measure HAZ-2.1. Temporary water quality impacts and post-construction water quality impacts would be reduced to less than significant with adherence to conditions of approval identified in Section 4.10, Hydrology and Water Quality. Groundborne vibration generated by construction equipment would be reduced to a less than significant level with implementation of mitigation measure NOI-2.1. All significant project-level impacts can be mitigated to a less than significant level. **(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 San Bruno 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 of project criteria pollutant impacts presented in Section 4.3 also reflects cumulative conditions, and the project would not contribute to significant cumulative impacts. The project's contribution to cumulative climate change impacts was presented in Section 4.7 as less than cumulatively considerable. Therefore, the proposed project would not make a substantial contribution to cumulative air quality or GHG emissions impacts.

With the implementation of the identified conditions of approval, best management practices, and mitigation measures, the proposed development would not result in significant geological, hydrological, or noise impacts. Therefore the project would not contribute to cumulative impacts to these resources, as these are specific to the site, and do not have the potential to contribute to or combine with localized, specific conditions on other development sites across the City over the planning horizon of the General Plan.

The project would result in less than significant impacts to aesthetics, energy use, land use, population and housing, public services, and recreation without the imposition of conditions of approval, best management practices, or mitigation measures. Furthermore, potential impacts associated with these resource areas are accounted for in the San Bruno General Plan and the San

Bruno General Plan EIR. Under Section 15152(f) of the CEQA Guidelines, where a lead agency has determined that a cumulative effect has been adequately addressed in a prior EIR, the effect is not treated as significant for purposes of later environmental review and need not be discussed in detail. Additionally, the project would not impact agricultural or forestry resources or mineral resources, therefore there is no potential for cumulative impacts to these resources. Nor are there any cumulative impacts associated with wildfire risk, as the project site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones.

The proposed project, in conjunction with cumulative projects, would not result in the loss of sensitive habitat. The project proposes the removal of 29 existing heritage trees. The project would be required to obtain a Heritage Tree Removal Permit and comply with the City's reforestation requirements. Additional tree preservation guidelines as recommended by the arborist report are required as conditions of approval, further protecting the area's biological resources. Pre-construction nesting bird surveys are required as mitigation, therefore, the project would not contribute to a significant cumulative impact on migratory birds.

The proposed project would result in temporary cultural and hazardous materials impacts during construction. With implementation of the conditions of approval, BMPs, and mitigation measures identified in this Initial Study, construction-level impacts would be mitigated to a less than significant level and would not be considered cumulatively considerable.

Given the above considerations, impacts associated with the proposed development would not result in a significant cumulative 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)
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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 air quality, hazardous materials, and noise. Implementation of conditions of approval and mitigation measures, and adherence to General Plan, City Code, and state and federal regulations described in this document, would avoid significant impacts. No other direct or indirect adverse effects on human beings have been identified.

SECTION 5.0 REFERENCES

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SECTION 6.0 LEAD AGENCY AND CONSULTANTS

6.1 LEAD AGENCY

City of San Bruno

Darcy Smith, Community and Economic Development Director

6.2 CONSULTANTS

David J. Powers & Associates, Inc.

Environmental Consultants and Planners

Oakland, CA

Akoni Danielsen, President / Principal Project Manager

Natalie Noyes, Project Manager

Matthew Moore, Researcher

Ryan Osako, Graphic Artist

Fehr & Peers

Transportation Consultants

Illingworth & Rodkin, Inc.

Acoustical & Air Quality Consultants

SECTION 7.0 ACRONYMS AND ABBREVIATIONS

2017 CAP	Bay Area 2017 Clean Air Plan
AB	Assembly Bill
ABAG	Association of Bay Area Governments
ACM	Asbestos Containing Materials
ADA	Americans with Disabilities Act
AFA	Acre-Feet Annually
AICP	American Institute of Certified Planners
ALUCP	Airport Land Use Compatibility Plan
APN	Assessor Parcel Number
BAAQMD	Bay Area Air Quality Management District
BART	Bay Area Rapid Transit
Basin Plan	Water Quality Control Plan for the San Francisco Bay Basin
Bgs	Below the ground surface
BIA	California Building Industry Association
BMPs	Best Management Practices
Btu	British thermal units
CA	California
CalARP	California Accidental Release Prevention
Cal Fire	California Department of Forestry and Fire Protection
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CALGreen	California Green Building Standards Code
Caltrans	California Department of Transportation
Cal/OSHA	California Occupational Safety and Health Administration
CARB	California Air Resources Board
CBC	California Building Standards Code
C/CAG	San Mateo City and County Association of Governments
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act

CFCs	Chlorofluorocarbons
CFR	Code of Federal Regulations
CGS	California Geological Survey
CH ₄	Methane
CHPS	Collaborative for High-Performance Schools
CLUP	San Mateo Comprehensive Land Use Plan
CNEL	Community Noise Equivalent Level
CO	Carbon monoxide
CO ₂	Carbon dioxide
CO ₂ e	Carbon dioxide equivalent
CRECs	Controlled Recognized Environmental Conditions
CRHR	California Register of Historical Resources
dBA	A-weighted decibel
DNL	Day-Night Level
DPM	Diesel particulate matter
DTSC	Department of Toxic Substances Control
EIR	Environmental Impact Report
EPA	U.S. Environmental Protection Agency
ESA	Environmental Site Assessment
EZRI	Earthquake Zones of Required Investigation
FAA	Federal Aviation Administration
FAR	Federal Aviation Regulations
FEMA	Federal Emergency Management Agency
FHSZs	Fire Hazard Severity Zones
FIRM	Flood Insurance Rate Maps
FMMP	Farmland Mapping and Monitoring Program
FTA	United States Department of Transportation's Federal Transit Administration
General Plan	San Bruno General Plan
GHGs	Greenhouse gases
GPD	Gallons per day
GWh	Gigawatt hours
HCP	Habitat Conservation Plan
HFCs	Hydrofluorocarbons

HRECs	Historically Recognized Environmental Conditions
IS	Initial Study
ISO	Insurance Services Office, Inc.
LBP's	Lead-Based Paints
LED	Light-Emitting Diode
LEED	Leadership in Energy and Environmental Design
L _{eq}	Equivalent noise level
LID	Low-Impact Development
L _{max}	Maximum A-weighted
LOS	Level of Service
LRA	Local Responsibility Area
MBTA	Migratory Bird Treaty Act
Mgd	Million gallons per day
MM	Mitigation Measure
MND	Mitigated Negative Declaration
Mpg	Miles per gallon
Mph	Miles per hour
MRP	NPDES Permit
MRZs	Mineral Resource Zones
MTC	Metropolitan Transportation Commission
MT CO _{2e}	Metric tons of carbon dioxide equivalent
NAHC	Native American Heritage Commission
NESHAP	National Emission Standards for Hazardous Air Pollutants
NFIP	National Flood Insurance Program
NHPA	National Historic Preservation Act
NOD	Notice of Determination
NOI	Notice of Intent
NO _x	Nitrogen oxides
NO ₂	Nitrogen dioxide
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NWIC	Northwest Information Center
O ₃	Ground-level ozone

OITC	Outdoor/Indoor Transmission Class
OPR	Office of Planning and Research
PCB	Polychlorinated biphenyls
PCE	Peninsula Clean Energy
PG&E	Pacific Gas & Electricity
PM	Particulate matter
PM _{2.5}	Fine particulate matter
PM ₁₀	Coarse particulate matter
PPC	Public Protection Classification
PPV	Peak Particle Velocity
REC	Recognized environmental condition
RHNA	Regional Housing Need Allocation
ROG	Reactive organic gases
RPS	Renewable Portfolio Standards
RWQCB	Regional Water Quality Control Board
SamTrans	San Mateo County Transit District
SSOs	Sanitary Sewer Overflows
SB	Senate Bill
SBGC	San Bruno Garbage Company
SBFD	San Bruno Fire Department
SBPD	San Bruno Police Department
SFHA	Special Flood Hazard Areas
SFO	San Francisco International Airport
SFPUC	San Francisco Public Utilities Commission
SHMA	Seismic Hazards Mapping Act
SMARA	Surface Mining and Reclamation Act
SMCWPPP	San Mateo Countywide Water Pollution Prevention Program
SMBG	State Mining and Geology Board
SO _x	Sulfur oxides
SR	State Route
SRA	State Responsibility Area
SSF/SB WQCP	South San Francisco-San Bruno Water Quality Control Plant
STC	Sound Transmission Class

SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TACs	Toxic air contaminants
TCR	Tribal Cultural Resources
TDM	Transportation Demand Management
TIA	Transportation Impact Analysis
USACE	United States Army Corps of Engineers
USFWS	United States Fish and Wildlife Service
UST	Underground storage tank
VHFHSZs	Very High Fire Hazard Severity Zones
VMT	Vehicle Miles Traveled
VOCs	Volatile Organic Compounds