TANFORAN REDEVELOPMENT PROJECT
DRAFT ENVIRONMENTAL IMPACT REPORT

SCH# 2023120409

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Acronyms and Abbreviations

Term	Definition
°C	degrees Celsius
µg/L	micrograms per liter
2017 Clean Air Plan	2017 *Clean Air Plan: Spare the Air, Cool the Climate*
2022 Scoping Plan	*2022 Scoping Plan for Achieving Carbon Neutrality*
AB	Assembly Bill
ABAG	Association of Bay Area Governments
ACM	asbestos-containing material
ADA	Americans with Disabilities Act
ADT	average daily traffic
AERMOD	Atmospheric Dispersion Modeling System
AFY	acre-feet per year
AIA	Airport Influence Area
Air District	Bay Area Air District
Alquist-Priolo Act	Alquist-Priolo Earthquake Fault Zoning Act of 1972
ALS-JPA	San Mateo County Pre-Hospital Emergency Medical Services Group Joint Powers Authority
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
AMSL	above mean sea level
ASTM	American Society for Testing and Materials
ATCM	Airborne Toxic Control Measure
BAAQMD	Bay Area Air Quality Management District
BART	Bay Area Rapid Transit
BART	San Bruno Bay Area Rapid Transit
Basin Plan	Water Quality Control Plan
BAT	best available technology
BAWSCA	Bay Area Water Supply & Conservation Agency
Bay-Delta Plan Amendment	San Francisco Bay/Sacramento-San Joaquin Delta Estuary
bgs	below ground surface
BMP	best management practice
BMPs	best management practices
BSL	biosafety level
BTU	British thermal unit
C/CAG	City/County Association of Governments
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAFE	Corporate Average Fuel Economy
CAFE	corporate average fuel economy

Term	Definition
CAL FIRE	California Department of Forestry and Fire Protection
Cal/OSHA	California Division of Occupational Safety and Health
CalEEMod	California Emissions Estimator Model
CalEnviroScreen	California Communities Environmental Health Screening Tool
CalEPA	California Environmental Protection Agency
CALGreen	California Green Building Standards Code
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CASQA	California Stormwater Quality Association
CBC	California Building Code
CCAA	California Clean Air Act
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA Guidelines	*California Environmental Quality Act Air Quality Guidelines*
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CESA	California Endangered Species Act
cfm	cubic feet per minute
CFR	Code of Federal Regulations
cfs	cubic feet per second
CGS	California Geological Survey
CH_4	methane
CHL	California Historical Landmark
City	City of San Bruno
CMP	Congestion Management Program
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNPPA	California Native Plant Protection Act of 1977
CNPS	California Native Plant Society
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
Construction General Permit	General Permit for Discharge of Stormwater Associated with Construction Activity
CPTED	Crime Prevention Through Environmental Design
CPUC	California Public Utilities Commission
CRHR	California Register of Historic Resources
CUPA	Certified Unified Program Agency
CWA	Clean Water Act

Term	Definition
dB	decibel
dBA	A-weighted decibel
DBH	diameter at breast height
DIB	Design Information Bulletin
DIF	Development Impact Fee
DPM	diesel particulate matter
DTSC	Department of Toxic Substances Control
DWR	Department of Water Resources
DWR	State of California Department of Water Resources
DX	direct expansion
EDR	Environmental Data Resources
EIR	Environmental Impact Report
EMFAC2021	EMissions FACtor 2021 Model
EO	Executive Order
EPA	U.S. Environmental Protection Agency
EPS	Economic & Planning Systems
ESA	Endangered Species Act
ESA	Environmental Site Assessment
EV	electric vehicle
EVCS	electric vehicle charging station
EVSE	electric vehicle supply equipment
FAA	Federal Aviation Administration
FAR	floor area ratio
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FIRM	Flood Insurance Rate Map
ft/s	feet per second
FY	Fiscal Year
g/L	grams per liter
GHG	greenhouse gas
GI Plan	Green Infrastructure Plan
GSA	Groundwater Sustainability Agencies
GSP	groundwater sustainability plan
GSR	Groundwater Storage and Recovery
GWMP	Groundwater Management Plan
GWP	global warming potential
H_2S	hydrogen sulfide
HCD	California Department of Housing and Community Development
HCM 7th	Highway Capacity Manual 7th Edition
HCP	habitat conservation plan
HDPE	high-density polyethylene

Term	Definition
HFC	hydrofluorocarbon
Hot Spots Act	Air Toxics 'Hot Spots' Information and Assessment Act of 1987
Housing Element Update IS/MND	*2023–2031 Housing Element Update Initial Study/Mitigated Negative Declaration*
HOV	high-occupancy vehicle
HRA	health risk assessment
HRE	historic resource evaluation
HVAC	heating, ventilation, and air conditioning
I-	Interstate
in/sec	inches per second
IPaC	Information for Planning and Consultation
IPCC	Intergovernmental Panel on Climate Change
IRP	Integrated Resource Plan
IS/MND	Initial Study/Mitigated Negative Declaration
KSFO	San Francisco International Airport monitoring station
kW	kilowatt
kWh/year	kilowatt hours per year
L_{dn}	day-night sound level
LED	light-emitting diode
LEED	Leadership in Energy and Environmental Design
L_{eq}	equivalent sound level
LID	Low Impact Development
L_{max}	maximum sound level
L_{min}	minimum sound level
LOS	level of service
LRSP	San Bruno Local Roadway Safety Plan
LTCP	Low-Threat Underground Storage Tank Case Closure Policy
LUST	Leaking Underground Storage Tank
LUST	leaking underground storage tank
MBTA	Migratory Bird Treaty Act
MERV	Minimum Efficiency Reporting Value
mgd	million gallons per day
MMRP	Mitigation Monitoring and Reporting Program
mpg	miles per gallon
mph	miles per hour
MPO	Metropolitan Planning Organization
MRP	Municipal Regional Permit
MS4	Municipal Separate Storm Sewer Systems
MTC	Metropolitan Transportation Commission
$MTCO_2e$	carbon dioxide equivalent
N_2O	nitrous oxide

Term	Definition
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NAVD88	North American Vertical Datum of 1998
NCCP	natural community conservation plan
NCCWD	North Coast County Water District
NFPA	National Fire Protection Association
NHPA	National Historic Preservation Act of 1966
NHTSA	National Highway Traffic Safety Administration
NO	nitric oxide
NO_2	nitrogen dioxide
NOP	Notice of Preparation
NO_X	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NWIC	Northwest Information Center
OBAG	One Bay Area Grant
OEHHA	Office of Environmental Health Hazard Assessment
OPR	Governor's Office of Planning and Research
OPR	Office of Planning and Research
OSHA	Occupational Safety and Health Administration
PCB	polychlorobiphenyl
PCE	Peninsula Clean Energy
pCi/L	picoCuries per liter
PD	Planned Development
P-D	Planned Development
PDA	Priority Development Area
PG&E	Pacific Gas and Electric Company
Phase I ESA	Phase I Environmental Site Assessment
PM	particulate matter
Porter-Cologne Act	Porter-Cologne Water Quality Control Act
pph	persons per household
PPV	peak particle velocity
PRC	Public Resources Code
project applicant	ARE-San Francisco No.96, LLC
project	Shops at Tanforan Shopping Center
project	Tanforan Redevelopment Project
PROWAG	Public Rights-of-Way Accessibility Guidelines
psi	pounds per square inch
R&D	Research and Development
RCRA	Resource Conservation and Recovery Act
REC	Recognized Environmental Condition

Term	Definition
Reclamation	U.S. Department of Interior, Bureau of Reclamation
Regional Water Board	Regional Water Quality Control Board
RHNA	Regional Housing Needs Allocation
RMS	root-mean-square
ROG	reactive organic gas
RPS	Renewable Portfolio Standard
RRFB	Rectangular Rapid Flashing Beacons
RTP	Regional Transportation Plan
RWS	Regional Water System
SamTrans	San Mateo County Transit District
SB	Senate Bill
SBFD	San Bruno Fire Department
SBPD	San Bruno Police Department
SBPSD	San Bruno Park School District
SCAQMD	South Coast Air Quality Management District
SCS	Sustainable Communities Strategy
SEL	sound equivalent level
SFBAAB	San Francisco Bay Area Air Basin
SFO	San Francisco International Airport
SFPUC	San Francisco Public Utilities Commission
SGMA	Sustainable Groundwater Management Act of 2014
SIP	State Implementation Plan
SLM	sound-level meter
SMCDEH	San Mateo County Health department
SMCEHD	San Mateo County Environmental Health Department
SMCWPPP	San Mateo Countywide Water Pollution Prevention Program
SMP	Soil Management Plans
SMUHSD	San Mateo Union High School District
SO_2	sulfur dioxide
SORE	small off-road engines
SO_X	sulfur oxides
SR	State Route
SRTP	SamTrans Short Range Transit Plan
SSFUSD	South San Francisco Unified School District
SSMP	*City of San Bruno Sewer System Management Plan*
State Water Board	State Water Resources Control Board
STC	Sound Transmission Class
SWPPP	stormwater pollution prevention plan
TAC	toxic air contaminant
Tanner Act	Toxic Air Contaminant Identification and Control Act
TCP	Transit Corridors Plan

Term	Definition
TDM	Transportation Demand Management
TMA	Transportation Management Association
TMDL	total maximum daily load
TNM	traffic noise model
TOC	Transit-Oriented Communities
TPA	Transit Priority Area
TPH	total petroleum hydrocarbon
TRA	Transit-Rich Area
UBC	Uniform Building Code
Unified Program	Unified Hazardous Waste and Hazardous Materials Management Regulatory Program
USACE	U.S. Army Corps of Engineers
USC	United States Code
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
UST	underground storage tank
UWMP	Urban Water Management Plan
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	vehicle miles traveled
VOC	volatile organic compound
WDR	Waste Discharge Requirement
WQCP	Water Quality Control Plan
WSA	Water Supply Assessment
WSCP	Water Shortage Contingency Plan
WSIP	Water System Improvement Program
WSMP	*2022 Water System Master Plan*
ZEV	zero-emissions vehicle

ES.1 Introduction

This Draft Environmental Impact Report (EIR) has been prepared in accordance with the California Environmental Quality Act (CEQA) to evaluate the proposed redevelopment of the Shops at Tanforan Shopping Center (project) in the City of San Bruno (City). This Draft EIR has been prepared in accordance with the provisions of CEQA and the CEQA Guidelines (Title 14 California Code of Regulations section 15000 et seq.).

As required by Section 15123 of the CEQA Guidelines, this summary presents the following information, including the major findings of this Draft EIR.

- Overview, including the location, a brief description, and objectives.
- Areas of known controversy and issues to be resolved.
- Summary of environmental impacts and mitigation measures, including significant and unavoidable impacts.
- Alternatives, including alternatives considered but rejected, alternatives evaluated in this Draft EIR, and identification of the environmentally superior alternative.

ES.2 Project Location and Overview

The project is located in the City, approximately 12 miles south of San Francisco, on the 44-acre Shops at Tanforan Shopping Center as well as a parcel north of Sneath Avenue (project site). The project site, known locally as the "Tanforan Mall," consists of a primary two-story mall building with three attached anchor stores (Hyundai, Target, and JCPenney), a three-level parking structure, a two-level steel structure, a Cinemark Century movie theater, and an automotive service building. The project site is generally bounded by Sneath Lane to the north, Huntington Avenue to the east, Interstate 380 (I-380) to the south, and El Camino Real (State Route 82) to the west. The project site also includes a vacant parcel north of Sneath Lane between Huntington Avenue and Maple Street.

This EIR provides a project-level review of the project. The project would establish a new Planned Development (P-D) zone on the project site to facilitate the redevelopment of the 44-acre Tanforan Mall and the parcel north of Sneath Lane. The new P-D zoning would allow for the development of a transit-oriented, mixed-use development including housing; retail uses; life-science laboratory uses; office uses; private and publicly accessible, privately owned open space; and potentially a hotel. The project would demolish the existing uses with the exception of the Century at Tanforan Theater and Target and their associated parking garages and construct approximately 1,000 to 1,514 multifamily residential units along with new and relocated retail space, life-science laboratory and office uses, amenity buildings, and underground and above-grade parking. The project would also establish two "flex zones," which would allow for the development of a range of alternative uses to provide flexibility to respond to changing market conditions. In total, the project would construct approximately 2,169,041 to 2,330,461 square feet of net new development on the project site.

ES.2.1 Project Objectives

The underlying purpose of the proposed project is to redevelop the 44-acre project site with an economically viable development that combines residential uses, community-serving retail uses, and employment opportunities near transit and freeway access.

Other objectives of the project include the following.

- Plan and develop a high-quality mixed-use redevelopment and revitalization of the Shops at Tanforan site.
- Provide a mix of uses including commercial office uses, research and development uses, residential uses, commercial retail uses, and/or a hotel use, and a mix of open space including publicly accessible open space, in a transit-oriented, urban infill location.
- Incorporate flexibility in the plan's phasing and buildout that would be accomplished through flex zones that allow for different mixes of uses resulting in a project that is responsive to tenant, customer, and expected user demands based on market conditions.
- Develop the site at an intensity and density that takes advantage of the transit resources in the area and allows the project to remain financially feasible while delivering onsite affordable housing, open space, community-serving retail and other public benefits and community amenities.
- Create a development plan that accommodates existing long-term ground-lease tenants.
- Establish vibrant gathering spaces and connected retail spaces to encourage neighborhood-serving retail, that provide shopping, eating and relaxing opportunities to residents and tenants of the project, as well as the larger San Bruno community.
- Increase the City of San Bruno's housing supply in support of its Regional Housing Needs Allocation (RHNA) obligations, through the creation of a mixed-use, mixed-income community that includes a minimum of approximately 1,000 residential units, consistent with the City of San Bruno's Housing Element, and a mix of market-rate and below-market-rate units.
- Create vibrant, state-of-the-art research and development and office facilities that support additional job growth, enhance property values, and generate property tax and development fees.
- Contribute to increased community recreation, and multimodal connectivity through inclusion of onsite privately owned, publicly accessible open spaces while enhancing linkages to the community's pedestrian and bicycle network, and improved pedestrian access to the San Bruno Bay Area Rapid Transit (BART) station.
- Produce high-quality architectural and landscape design that encourages variety and authenticity as well as compatible and or complementary with its surrounding context and will contribute to the San Bruno community.
- Create a transit-oriented development that is committed to sustainable design and programming through its transportation demand management, efficient building systems, and use of environmentally conscious construction materials and methods.

- Create a thriving mixed-use, transit-oriented project that locates housing near jobs and existing transit corridors and public transportation facilities that includes off-street parking for residential, retail, and office and research and development uses to meet the project's needs.
- Celebrate the site's history by providing for the appropriate relocation of historic and cultural elements.
- Create a cohesive campus-like environment by providing sufficient space for tenants to employ key scientific and business personnel in proximity to each other to foster efficient collaboration and productivity.
- Provide a development and infrastructure plan that can be built in phases to best respond to market demand and changing conditions.

ES.3 Areas of Known Controversy and Issues to be Resolved

Publication of the Notice of Preparation (NOP) for this EIR initiated a public comment and scoping period that began on December 18, 2023, and ended on January 17, 2024. During the NOP review and comment period, a total of ten letters were submitted to the City Manager's Office by interested parties. Environmental concerns specific to the project or the scope and contents of the EIR were received regarding hazards, hydrology, utilities, transportation, public services, cultural resources, biological resources, noise, aesthetics, air quality and greenhouse gases, and land use. Other comments were related to project design and the project's location within the airport land use compatibility planning area for the environs of San Francisco International Airport and related building heights, land use, noise, and safety issues. A public scoping meeting was held on Tuesday, January 16, 2024, at the San Bruno Senior Center (1555 Crystal Springs Road, San Bruno, California 94066). Environmental concerns raised during the public scoping meeting included concerns regarding the existing memorial at the project site and concerns regarding the condition of the project site during construction.

The City Manager's Office has considered the comments made by the public in response to both the NOP and scoping meeting for the project. Comments received during the scoping process are on file at the City of San Bruno Community Development Department (567 El Camino Real, San Bruno, California 94066). The NOP is provided in Appendix 1-1, *Notice of Preparation and Comments Received on the Notice of Preparation*, of this EIR.

ES.4 Project Impacts and Mitigation Measures

ES.4.1 Impacts Summary

The impacts described in this EIR are for the potential full buildout of the project. As described in more detail in Chapter 2, *Project Description*, to account for the variability resulting from the flex zones, each chapter of this EIR analyzes the buildout scenario (i.e., Scenario A (Maximum R&D) or Scenario B (Maximum Residential)) which represents the "worst-case" scenario for the resource area being analyzed. The worst-case scenario is the scenario with the greatest potential to result in significant impacts.

In addition, during the scoping process for this Draft EIR, the City determined that implementation of the project would not result in significant environmental impacts on aesthetics, agriculture and forestry resources, mineral resources, or wildfire. A detailed analysis of these topics is, therefore, not included in this Draft EIR; refer to Chapter 3, *Environmental Impact Analysis*, *Impacts Found Not to Be Significant*, for further discussion.

Table ES-1, presented at the end of this summary, presents a summary of the significant impacts of the project identified in the EIR and the proposed mitigation measures that reduce these impacts, including cumulative impacts that were found to be significant. Detailed discussions of the impacts, mitigation measures and proposed policies that would reduce impacts are in Chapter 3.

ES-4.2 Significant and Unavoidable Impacts

Significant and unavoidable impacts are those that cannot be reduced to a less-than-significant level with mitigation or for which no feasible mitigation is available. The project would result in significant and unavoidable impacts related to air quality, noise, and utilities, as shown below.

Impact AQ-3: Health Risks from Toxic Air Contaminants (TACs). The project would result in the exposure of sensitive receptors to substantial TAC concentrations from the combined effects of construction and operation.[1]

The project would result in the exposure of sensitive receptors to substantial TAC and criteria pollutant concentrations during construction and operation. Construction activities associated with the project would generate diesel particulate matter (DPM) and particulate matter with a diameter of 2.5 microns or less (PM2.5) that could expose adjacent receptors to significant health risks. Similarly, onsite receptors would experience a significant PM2.5 impact from exhaust and fugitive dust emissions. The causes of the cancer risk threshold exceedance for onsite receptors are from future residential receptors being exposed to DPM during construction at the site and then to TACs for nearly 30 years during operations, specifically DPM from generator testing and truck traffic and laboratory-related TACs from onsite laboratory uses. The primary causes of the PM2.5 concentration exceedances are onsite off-road equipment activity, earthmoving activities, and vehicle travel during construction, which generates fugitive PM2.5 from resuspended road dust. Thus, the health risk results and PM2.5 concentrations would exceed the Air District's thresholds after the incorporation of **Mitigation Measures AQ-2-A, AQ-2-B, AQ-2-C, AQ-2-D**, and **AQ-3-A** and the project would result in a significant and unavoidable impact with respect to health risks and PM2.5 impacts. Therefore, even with mitigation, this would result in a ***significant and unavoidable*** impact.

[1] As discussed in Section 3.1, *Air Quality*, the threshold language in Appendix G of the CEQA Guidelines, which is evaluated in the analysis, is: "Would the project expose sensitive receptors to substantial pollutant concentrations?" Additional language is included here to provide context for the significant impact.

Impact NOI-1-A: Non-Daytime Construction Noise. Project construction would generate 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.

Construction noise from concrete pour activities during non-daytime hours was modeled to be in excess of the applicable City of San Bruno criterion for nighttime construction noise (i.e., 60 A-weighted decibels [dBA] at 100 feet from the noise source between 10:00 p.m. and 7:00 a.m.). **Mitigation Measure NOI-1-A** requires the development of a Construction Noise Control Plan for nighttime construction, which would include specific measures to reduce noise from non-daytime construction activity (e.g., locating equipment as far as possible from noise-sensitive uses, equipping equipment with mufflers and sound control devices to reduce noise). While this mitigation measure would reduce construction noise effects, it may not be possible to reduce noise levels during all non-daytime construction activities to less-than-significant levels. In addition, because construction activities would occur during non-daytime hours for an estimated 100 days during project construction, the frequency of the nighttime construction noise would be somewhat substantial. **Mitigation Measure NOI-1-B** requires the installation of a temporary construction noise barrier along the length of the project construction site near residential uses before nighttime construction activities within approximately 500 feet of those residential uses. While the installation of such a barrier would reduce noise from construction activities, the barrier may not reduce noise levels from all concrete pour activities to below the applicable significance criterion levels, even if noise is somewhat reduced. Therefore, even with mitigation, this would result in a ***significant and unavoidable*** impact.

Impact C-NOI-1: Cumulative Non-Daytime Construction Noise. The project, in combination with past, present, and reasonably foreseeable future projects, would result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in a local general plan or noise ordinance or applicable standards of other agencies.

It is possible that future cumulative projects within 1,000 feet of the project site may require construction activities outside standard daytime hours. Of note, according to the Final EIR prepared for the Southline project (State Clearinghouse No. 2020050452), nighttime concrete pours are anticipated as part of that project. While Phase 1 of the Southline project is nearly complete at the time of this EIR analysis, construction of future phases could overlap with construction of the project. Therefore, for the reasons stated under Impact NOI-1-a, and given the potential for non-daytime construction for the project to occur concurrently with that of other nearby projects, particularly the Southline project, a ***significant and unavoidable*** impact would occur.

ES.5 Alternatives to the Proposed Project

CEQA Guidelines Section 15126.6 requires an EIR to evaluate a reasonable range of alternatives to the project that would feasibly attain most of the project's basic objectives but that would avoid or substantially lessen any identified significant environmental impacts of the project, as well as the no project alternative.

ES.5.1 Project Alternatives

The following three alternatives to the project are analyzed in this Draft EIR.

ES.5.1.1 No Project/No Build Alternative

CEQA requires the evaluation of a no project alternative (CEQA Guidelines Section 15126.6(e)). The analysis of the no project alternative is based on the assumption that the proposed project would not be approved. The purpose of evaluating the no project alternative is to allow decision-makers to compare the potential impacts of approving the project with the potential impacts of not approving the project. In certain instances, the no project alternative means "no build" wherein the existing environmental setting is maintained. The environmental setting is usually defined at the time of the NOP (in the case of the project, December 2023). However, where failure to proceed with the project would not result in preservation of existing environmental conditions, the no project alternative should identify the practical result of the project's non-approval rather than create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment.

Under the No Project/No Build Alternative, the mall would continue operation, but further erosion of mall tenancies could be anticipated based on regional and national trends in mall retail, and no new construction would occur at the project site. Existing land uses would remain unchanged and in their current physical state. No demolition of existing uses would occur, and no new housing, retail uses, life-science laboratory uses, office uses, or hotel uses would be built. No new streetscape, open space, or internal roadways would be constructed. Existing *San Bruno General Plan* land use classifications and zoning districts would be maintained on the project site.

ES.5.1.2 Existing Zoning Alternative

The Existing Zoning Alternative is based on what would be reasonably expected to occur in the foreseeable future if the project were not approved and the mall continued in operation. Under the Existing Zoning Alternative, the indoor mall would remain but would be converted to an entertainment center (e.g., arcade, TopGolf, or similar "fun zone"). Interior renovations would occur, but no demolition of existing uses or exterior construction would occur. Additional housing would be built out to the extent allowable under ordinances already processed under the Housing Element Update, and would be limited to the existing parking lot areas and the parcel north of Sneath Lane. Housing units would be built up to the 1,000 units allowed under the existing P-D zoning and would be constructed in the southeast corner of El Camino Real and Sneath Lane and on the parcel north of Sneath Lane. The existing 81,500-square-foot Century at Tanforan Theater would be remodeled and the existing Target would remain.

ES.5.1.3 Reduced Density Alternative

Under the Reduced Density Alternative, the overall density of the project would be reduced. The Reduced Density Alternative was considered for its potential to reduce vehicle trips, construction activities, and consumer product use, thereby reducing and potentially avoiding health risks and PM2.5 impacts. Recognizing the City's obligation under state housing law to demonstrate progress in meeting its RHNA goal, density reductions would be focused on non-residential uses.

Under the Reduced Density Alternative, the project would construct 1,014 multifamily residential units in the same locations and configurations proposed under the project. In Flex Zone II, the square footage of nonresidential (i.e., R&D/office, amenity, and retail) uses would be reduced, reducing the project's overall net new nonresidential development by approximately 20 percent. This would equate to a reduction of approximately 230,000–450,000 square feet of nonresidential floor area, depending on the development scenario. Approximately 3 acres (roughly half) of the flex zone would instead be developed with a public park providing active and passive recreation uses such as a playground, playing field, picnic/seating areas, and walking paths. With fewer buildings and more open space developed in Flex Zone II, less excavation would be required in this area under this alternative. All other components of the Reduced Density Alternative would be similar to the project.

ES.5.2 Alternatives Rejected as Infeasible

The following alternatives were under consideration but were rejected on the basis of infeasibility and inability to meet the basic objectives of the proposed project.

ES.5.2.1 Off-Site Alternative

Under the Off-Site Alternative, the Tanforan Redevelopment Project, or a project of similar scale and intensity, would be implemented at a different location in the City of San Bruno, and no changes would occur to the project site. Depending on the location and its proximity to the alternative transportation modes and sensitive receptors, implementing the project at a different site could reduce exposure of sensitive receptors to substantial pollutant concentrations and noise during non-daytime construction.

The Off-Site Alternative was rejected as infeasible because it would not meet the fundamental purpose of the Tanforan Redevelopment Project, and would not redevelop and revitalize the Shops at Tanforan site, take advantage of the transit resources in the area, or increase the City of San Bruno's housing supply in support of its RHNA obligations. The project site is included as housing opportunity Site 20 in the Housing Element, the largest opportunity site identified to provide the housing necessary to meet the City's RHNA obligations.[2] The Housing Element assumed that a minimum of 1,002 housing units would be included at the project site and as part of the Housing Element's implementation, the City amended the *San Bruno General Plan* and rezoned a portion of the project site to allow for multifamily residential uses. Thus, developing the project on this specific site fulfills citywide planning initiatives already identified in the Housing Element. Furthermore,

[2] The project site was evaluated as Housing Opportunity Site 14 as part of the Housing Element Initial Study/Mitigated Negative Declaration, and was subsequently renumbered to Housing Opportunity Site 20 as part of the adopted 2023-2031 Housing Element. This Draft EIR uses Housing Opportunity Site 20 to identify the project site consistent with how the site is referenced in the adopted Housing Element.

there are no other vacant or underutilized sites within the City that could accommodate the type and scale of redevelopment envisioned for the project site, which is why the project site was identified as the largest housing opportunity site in the Housing Element. Therefore, the Off-Site Alternative would hinder the City's ability to meet its RHNA obligations in accordance with California State housing law. For these reasons, the Off-Site Alternative was rejected from further consideration.

ES.5.2.2 No Residential Alternative

Under the No Residential Alternative, the Tanforan Redevelopment Project would not construct any residential units on the project site. The amount of laboratory and office uses, as well as retail and open space uses would be the same as the proposed project. This alternative was considered because it would not construct housing within the 70 dBA Community Noise Equivalent Level (CNEL) contour for San Francisco International Airport (SFO), which was identified as an issue of concern in comments received on the NOP.

The No Residential Alternative was rejected as infeasible because it would not meet the underlying purpose of the project or the majority of project objectives. As described in Chapter 4, Section 4.2.1, *Off-Site Alternative*, the project site was identified in the Housing Element as a housing opportunity site. San Bruno is a small, mostly built-out city, with relatively few areas where large-scale redevelopment can take place. The No Residential Alternative would substantially jeopardize the City's ability to fulfill its RHNA obligations, and would be inconsistent with the *San Bruno General Plan*. For these reasons, the No Residential Alternative was rejected from further consideration.

ES.5.2.3 Decreased Residential Alternative

Under the Decreased Residential Alternative, the development intensity of the project would be reduced in terms residential of development constructed at the project site. The Decreased Residential Alternative would construct 500 residential units, with the remaining project components the same. This alternative was considered for its potential to reduce the project's significant impacts related to TACs as it would reduce the overall scale of construction and future vehicle emissions, as well as the number of future onsite sensitive receptors.

The project's significant and unavoidable impact related to TAC and PM2.5 emissions are primarily the result of emissions generated during construction and the exposure of onsite sensitive receptors to those emissions. While reducing the number of residential units would reduce future onsite sensitive receptors and construction activities, construction of the alternative would still have the potential to expose receptors to criteria air pollutants and TACs. Without conducting detailed modeling, which is not required for Alternatives analysis under CEQA, it would be speculative to estimate how much mitigation would be needed to reduce impacts for future health risks—because reducing residential development would likely still result in the close proximity of on-site residences to TAC emissions and thus exposure of TACs during construction activities—or to conclude if they would be reduced below Air District threshold levels. Furthermore, as described in Chapter 4, Section 4.2.1, *Off-Site Alternative*, developing fewer than 1,002 residential units on the project site would be inconsistent with the *San Bruno General Plan* and Housing Element Update, and would substantially jeopardize the City's ability to fulfill its RHNA obligations. For these reasons, the Decreased Residential Alternative was rejected from further consideration.

ES.5.2.4 Increased Residential Alternative

Under the Increased Residential Alternative, the project would demolish all existing uses at the project site except for the Century at Tanforan Theater, the Target, and their associated parking garages, and construct up to 2,000 housing units along with landscaped areas and public and privately accessible open space. No retail, laboratory, hotel, or office uses would be constructed on the project site, nor would any restaurants, cafés, or market hall be constructed. The alternative would better support San Bruno's RHNA obligations by doubling the amount of residential units currently allowed at the site. The alternative would also reduce air quality impacts associated with nonresidential uses such as office, laboratory, and retail space.

The Increased Residential Only Alternative was rejected as infeasible because it would not meet the majority of project objectives: it would not create a mixed-use, transit-oriented project that locates housing near jobs, nor would it encourage neighborhood-serving retail, or create state-of-the-art research and development facilities to support job growth and generate property tax and development fees. For these reasons, the Increased Residential Alternative was rejected from further consideration.

ES.5.2.5 No Non-Daytime Construction Alternative

Under the No Non-Daytime Construction Alternative, concrete pours would be scheduled during daytime hours (7:00 a.m. to 10:00 p.m.) as defined by the San Bruno Municipal Code. This alternative was considered for its potential to reduce or avoid the project's significant and unavoidable impact related to non-daytime construction noise, and the corresponding cumulative impact.

The project cannot feasibly accommodate daytime concrete pours for several reasons. First, the pour is substantial in size, and the mat foundation is particularly thick, which means it requires a significant amount of time to complete. Typically, the pouring process takes between 8 to 12 hours. If this were to be done during the day, it would necessitate shutting down the entire construction site, as the amount of concrete trucks required would prohibit other materials and trucks from accessing the site, which would severely limit the movement of materials. Furthermore, weight cannot be put on concrete while it settles, limiting other actions at the project site. The curing of concrete also requires temperature controls, and the exposure to sunlight can result in water evaporating from the concrete, affecting the process. It would also disrupt access to the surrounding street network during peak traffic hours. This would cause considerable inconvenience and potential delays, making daytime pours impractical for this project. Furthermore, because it would shut down construction activities across the entire construction site for up to 100 separate days during the overall construction duration, the No Non-Daytime Construction Alternative would extend the overall construction duration. However, health risks associated with the No Non-Daytime Construction Alternative would be similar to the project since total TAC emissions from construction would be similar to the project. For these reasons, the No Non-Daytime Construction Alternative was rejected from further consideration.

ES.5.2.6 Revised Construction Phasing Alternative

Under the Revised Construction Phasing Alternative, the construction phasing schedule would be altered so that residential uses are constructed last. This alternative was considered for its potential to reduce or avoid the project's significant and unavoidable impact related to exposing on-site sensitive receptors to substantial TAC concentrations during construction and (later) operation. This alternative was rejected as infeasible because it would delay introduction of the mixed-use redevelopment, would reduce flexibility in the plan's phasing and buildout in a manner that is responsive to market conditions and demand, and the timing of housing production would delay achieving the City's housing goals.

ES.5.3 Environmentally Superior Alternative

The No Project/No Build Alternative would avoid all of the project's significant impacts. The Existing Zoning Alternative would avoid the project's significant air quality impact, and would reduce but would not avoid the project's significant impacts related to non-daytime construction noise. The Reduced Density Alternative would reduce, but not avoid, the project's significant air quality impact related to health risks from TACs. The Reduced Density Alternative would not reduce or avoid the project's significant impacts related to non-daytime construction noise. Therefore, the Existing Zoning Alternative is the environmentally superior alternative. However, it should be noted that although the Reduced Density Alternative would advance Plan Bay Area 2050 objectives to provide dense, mixed-use development in proximity to transit, with less density than the project, it would meet these objectives to a lesser extent than the project.

Table ES-1. Summary of Impacts under the Project

Impact	Significance before Mitigation	Mitigation	Significance after Mitigation
Air Quality			
Impact AQ-1: The project would not conflict with or obstruct implementation of the applicable air quality plan.	Less than Significant	None required	--
Impact AQ-2: The project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is a nonattainment area for an applicable federal or state ambient air quality standard during construction and operation.	Significant	• **Mitigation Measure AQ-2-A:** Use Clean Diesel-Powered or Electric Equipment During Construction to Control Construction-related Emissions. • **Mitigation Measure AQ-2-B:** Implement Modified Bay Area Air District Basic Construction Mitigation Measures to Reduce Dust Emissions. • **Mitigation Measure AQ-2-C:** Require Low-VOC Coatings During Project Operation. • **Mitigation Measure AQ-2-D:** Replace Gas-Powered Landscape Equipment with Zero-Emissions Landscape Equipment.	Less than Significant
Impact AQ-3: The project would expose sensitive receptors to substantial pollutant concentrations.	Significant	• **Mitigation Measure AQ-2-A:** Use Clean Diesel-Powered or Electric Equipment During Construction to Control Construction-related Emissions. • **Mitigation Measure AQ-2-B:** Implement Modified Bay Area Air District Basic Construction Mitigation Measures to Reduce Dust Emissions. • **Mitigation Measure AQ-2-C:** Require Low-VOC Coatings During Project Operation. • **Mitigation Measure AQ-2-D:** Replace Gas-Powered Landscape Equipment with Zero-Emissions Landscape Equipment. • **Mitigation Measure AQ-3-A:** Installation of High-Efficiency Air Filtration Systems	Significant and Unavoidable

Impact	Significance before Mitigation	Mitigation	Significance after Mitigation
Impact AQ-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	None required	--
Impact AQ-2-C:[a] The project, in combination with past, present, and reasonably foreseeable future projects, would result in a net increase in criteria pollutants for which the project region is classified as a nonattainment area under an applicable federal or state ambient air quality standard, but the project's contribution would be less than cumulatively considerable.	Significant	• **Mitigation Measure AQ-2-A:** Use Clean Diesel-Powered or Electric Equipment During Construction to Control Construction-related Emissions. • **Mitigation Measure AQ-2-B:** Implement Modified Bay Area Air District Basic Construction Mitigation Measures to Reduce Dust Emissions. • **Mitigation Measure AQ-2-C:** Require Low-VOC Coatings During Project Operation. • **Mitigation Measure AQ-2-D:** Replace Gas-Powered Landscape Equipment with Zero-Emissions Landscape Equipment.	Less Than Cumulatively Considerable
Biological Resources			
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 California Department of Fish and Wildlife or U.S. Fish and Wildlife.	Significant	• **Mitigation Measure BIO-1-A:** Preconstruction Nesting Bird Surveys and Buffer Areas.	Less than Significant
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, or regulations or by California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.	No Impact	None required	--
Impact BIO-3: The project would not have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct	No Impact	None required	--

Impact	Significance before Mitigation	Mitigation	Significance after Mitigation
removal, filling, hydrological interruption, or other means.			
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.	Significant	• **Mitigation Measure BIO-1-A:** Preconstruction Nesting Bird Surveys and Buffer Areas. • **Mitigation Measure BIO-4-A:** Lighting Measures to Reduce Impacts on Birds. • **Mitigation Measure BIO-4-B:** Building Design Measures to Minimize Bird-Strike Risk.	Less than Significant
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	None required	--
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	None required	--
Impact C-BIO-1:[a] The project, in combination with past, present, and reasonably foreseeable future projects, would result in a significant cumulative impact on biological resources, but the project's contribution would be less than cumulatively considerable with mitigation.	Significant	• **Mitigation Measure BIO-1-A:** Preconstruction Nesting Bird Surveys and Buffer Areas. • **Mitigation Measure BIO-4-A:** Lighting Measures to Reduce Impacts on Birds. • **Mitigation Measure BIO-4-B:** Building Design Measures to Minimize Bird-Strike Risk.	Less Than Cumulatively Considerable
Cultural Resources			
Impact CUL-1: The project would not cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.	Significant	• **Mitigation Measure CUL-1:** Relocate and Incorporate the Existing Memorial Plaque and Commemorative Garden on the Property.	Less than Significant
Impact CUL-2: The project would not cause a substantial adverse change in the significance of a known archaeological resource, pursuant to Section 15064.5.	Significant	• **Mitigation Measure CUL-2-A:** Conduct Cultural Resource Awareness Training Prior to Project-Related Ground Disturbance and Stop Work if Archaeological Deposits Are Encountered During Ground-Disturbing Activities.	Less than Significant

Impact	Significance before Mitigation	Mitigation	Significance after Mitigation
		• **Mitigation Measure CUL-2-B:** Stop Work if Buried Cultural Deposits are Encountered During Construction Activities.	
Impact CUL-3: The project would not have the potential to disturb or potentially disturb any undiscovered human remains, including those interred outside of formal cemeteries.	Less than Significant	None required	--
Impact C-CUL-2:[a] The project, in combination with past, present, and reasonably foreseeable future projects, would result in a significant cumulative impact on archaeological resources, but the project's contribution would be less than cumulatively considerable with mitigation.	Significant	• **Mitigation Measure CUL-2-A:** Conduct Cultural Resource Awareness Training Prior to Project-Related Ground Disturbance and Stop Work if Archaeological Deposits Are Encountered During Ground-Disturbing Activities. • **Mitigation Measure CUL-2-B:** Stop Work if Buried Cultural Deposits are Encountered During Construction Activities.	Less Than Cumulatively Considerable
Energy			
Impact EN-1: The project would not result in wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation.	Significant	• **Mitigation Measure AQ-2-A:** Use Clean Diesel-Powered or Electric Equipment during Construction to Control Construction-Related Emissions.	Less than Significant
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	None required	--
Geology, Soils, and Paleontology			
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, strong seismic ground shaking, seismic-related ground failure, including liquefaction, or landslides.	Less than Significant	None required	--
Impact GEO-2: The project would not result in substantial soil erosion or the loss of topsoil.	Less than Significant	None required	--

Impact	Significance before Mitigation	Mitigation	Significance after Mitigation
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.	Less than Significant	None required	--
Impact GEO-4: The project would not be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.	Less than Significant	None required	--
Impact GEO-5: The project would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.	No Impact	None required	--
Impact GEO-6: The project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	Significant	• **Mitigation Measure GEO-6:** Provide Construction Personnel Training and Follow Unanticipated Paleontological Resources Discovery Protocol.	Less than Significant
Impact C-GEO-2:[a] The project, in combination with past, present, and reasonably foreseeable future projects, would result in a significant cumulative impact on paleontological resources, but the project's contribution would be less than cumulatively considerable.	Significant	• **Mitigation Measure GEO-6**: Provide Construction Personnel Training and Follow Unanticipated Paleontological Resources Discovery Protocol.	Less Than Cumulatively Considerable
Greenhouse Gases	Greenhouse Gases	Greenhouse Gases	Greenhouse Gases
Impact GHG-1: The project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment during construction and operation.	Less than significant	None required	--
Impact GHG-2: The project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases during construction and operation.	Less than significant	None required	--

Impact	Significance before Mitigation	Mitigation	Significance after Mitigation
Hazards and Hazardous Materials			
Impact HAZ-1: The project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	Less than Significant	None required	--
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.	Significant	• **Mitigation Measure HAZ-2-A:** Prepare a Soil Management Plan Prior to Construction. • **Mitigation Measure HAZ-2-B:** Conduct a Hazardous Building Materials Survey prior to Demolition Activities and Hazardous Building Material Handling. • **Mitigation Measure HWQ-1:** Require Groundwater Monitoring and Sampling Prior to Dewatering Activity.	Less than Significant with Mitigation
Impact HAZ-3: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school.	No Impact	None required	--
Impact HAZ-4: Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment.	Significant	• **Mitigation Measure HAZ-2-A:** Prepare a Soil Management Plan Prior to Construction.	Less than Significant with Mitigation
Impact HAZ-5: For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 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.	Significant	• **Mitigation Measure HAZ-5:** Demonstrate Compliance with San Francisco International Airport Airspace Compatibility Policies.	Less than Significant with Mitigation
Impact HAZ-6: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	Less than Significant	None required	--
Impact HAZ-7: Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.	Less Than Significant	None required	--

Impact	Significance before Mitigation	Mitigation	Significance after Mitigation
Hydrology and Water Quality			
Impact HWQ-1: The project would not result in the violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.	Significant	• **Mitigation Measure HWQ-1:** Require Groundwater Monitoring Well Installation and Sampling Prior to Dewatering Activity	Less than Significant
Impact HWQ-2: The project would not substantially decrease groundwater supplies or substantially interfere with groundwater recharge such that the project may impeded sustainable groundwater management of the basin.	Less than Significant	None required	--
Impact HWQ-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 of-site; substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or offsite; create or contribute water that 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.	Significant	• **Mitigation Measure HWQ-3:** Require a Site Survey To Verify Existing Drainage Capacity	Less than Significant
Impact HWQ-4: The project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.	Less than Significant	None required	--
Impact C-HWQ-1:[a] The project, in combination with past, present, and reasonably foreseeable future projects, would result in a significant cumulative impact on hydrology and water quality, but the project's contribution would be less than cumulatively considerable.	Significant	• **Mitigation Measure HWQ-1:** Require Groundwater Monitoring Well Installation and Sampling Prior to Dewatering Activity	Less Than Cumulatively Considerable
Impact C-HWQ-3:[a] The project, in combination with past, present, and reasonably foreseeable future projects, would result in a significant cumulative	Significant	• **Mitigation Measure HWQ-2:** Require a Site Survey To Verify Existing Drainage Capacity	Less Than Cumulatively Considerable

Impact	Significance before Mitigation	Mitigation	Significance after Mitigation
impact on drainage patterns, but the project's contribution would be less than cumulatively considerable.			
Land Use			
Impact LU-1: The project would not physically divide an established community.	Less than Significant	None required	--
Impact LU-2: The project would not result in an environmental impact due to conflict with any land use plan, policy, or regulation for the purpose of avoiding or mitigating an environmental effect.	Significant	• **Mitigation Measure HAZ-5:** Demonstrate Compliance with San Francisco International Airport Airspace Compatibility Policies. • **Mitigation Measure NOI-3:** Develop Airport Noise Reduction Plan for Residential Dwellings	Less than Significant with Mitigation
Impacts C-LU-2:[a] The project, in combination with past, present, and reasonably foreseeable future projects, would result in an environmental impact due to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, but the project's contribution would be less than cumulatively considerable.	Less Than Cumulatively Considerable	None required	--
Noise			
Impact NOI-1-A: Project construction would generate 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.	Significant	• Best Management Practices for Construction Noise (All Hours): See Section 3.10, *Noise*. • **Mitigation Measure NOI-1-A:** Develop a Construction Noise Control Plan to Reduce Noise Outside Standard Construction Hours • **Mitigation Measure NOI-1-B:** Construct Temporary Noise Barrier along the Project Perimeter (where nighttime construction would occur within 500 feet of any sensitive receptor)	Significant and Unavoidable
Impact NOI-1-B: Project operation would not generate 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.	Significant	• **Mitigation Measure NOI-1-C:** Create a Mechanical Equipment Noise Reduction Plan • Mitigation Measure NOI-1-D: Develop Emergency Generator Noise Reduction Plan	Less than Significant with Mitigation

Impact	Significance before Mitigation	Mitigation	Significance after Mitigation
Impact NOI-2: The project would not result in the generation of excessive groundborne vibration or groundborne noise levels.	Less than Significant	None required	--
Impact NOI-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 2 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.	Significant	• **Mitigation Measure NOI-3:** Develop Airport Noise Reduction Plan for Residential Dwellings	Less than Significant with Mitigation
Impact C-NOI-1:[a] The project, in combination with past, present, and reasonably foreseeable future projects, would result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in a local general plan or noise ordinance or applicable standards of other agencies.	Significant	• **Mitigation Measure NOI-1-A:** Develop a Construction Noise Control Plan to Reduce Noise Outside Standard Construction Hours • **Mitigation Measure NOI-1-B:** Construct Temporary Noise Barrier along the Project Perimeter (where nighttime construction would occur within 500 feet of any sensitive receptor)	Significant and Unavoidable
Population and Housing			
Impact POP-1: The project would not induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads of other infrastructure).	Less than Significant	None required	--
Impact POP-2: The project would not displace substantial numbers of people or housing, necessitating the construction of replacement housing elsewhere.	Less than Significant	None required	--
Public Services			
Impact PS-1 (Fire): The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response	Less than Significant	None required	--

Impact	Significance before Mitigation	Mitigation	Significance after Mitigation
times or other performance objectives for fire protection.			
Impact PS-2 (Police): The project would not result in substantial adverse physical impacts associated with the provision of 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.	Less than Significant	None required	--
Impact PS-3 (Schools): The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable performance objectives for schools.	Less than Significant	None required	--
Impact PS-4 (Libraries): The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for libraries.	Less than Significant	None required	--
Recreation			
Impact REC-1: The project would not increase use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would not occur or be accelerated.	Less than Significant	None required	--
Impact REC-2: The project would not include recreational facilities or require construction or expansion of recreational facilities that would have an adverse physical effect on the environment.	Less than Significant	None required	--

Impact	Significance before Mitigation	Mitigation	Significance after Mitigation
Transportation			
Impact TRA-1: The project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.	Less than Significant	None required	--
Impact TRA-2: The project would not conflict or be inconsistent with State CEQA Guidelines Section 15064.3, subdivision (b).	Less than Significant	None required	--
Impact TRA-3: The project would not substantially increase hazards because of a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).	Less than Significant	None required	--
Impact TRA-4: The project would not result in inadequate emergency access.	Less than Significant	None required	--
Tribal Cultural Resources			
Impacts TCR-1 and TCR-2: The project would not cause a substantial adverse change in the significance of a Tribal cultural resource that is (a) 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), or (b) determined by the lead agency to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1.	Significant	• **Mitigation Measure CUL-2-A:** Conduct Cultural Resource Awareness Training Prior to Project-Related Ground Disturbance and Stop Work if Archaeological Deposits Are Encountered During Ground-Disturbing Activities. • **Mitigation Measure CUL-2-B:** Stop Work if Buried Cultural Deposits are Encountered During Construction Activities.	Less than Significant
Utilities			
Impact UT-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 would cause significant environmental effects.	Significant	• **Mitigation Measure UT-1-A:** Off-Site Water Facility Upgrades • **Mitigation Measure UT-1-B:** On-Site Water Facility Upgrades • **Mitigation Measure UT-1-C:** Wastewater Facility Upgrades • **Mitigation Measure HWQ-3:** Require a Site Survey To Verify Existing Drainage Capacity	Less than Significant

Impact	Significance before Mitigation	Mitigation	Significance after Mitigation
Impact UT-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	None required	--
Impact UT-3: The project would not result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected wastewater treatment demand in addition to the provider's existing commitments.	Less than Significant	None required	--
Impact UT-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. In addition, the project would not fail to comply with federal, state, and local management and reduction statutes and regulations related to solid waste.	Less than Significant	None required	--
Impact C-UT-1:[a] The project, in combination with past, present, and reasonably foreseeable future projects, would result in a significant cumulative impact on water, wastewater, storm drain, or electricity, natural gas, and telecommunication services facilities infrastructure, but the project's contribution would be less than cumulatively considerable.	Significant	• **Mitigation Measure UT-1-A:** Off-Site Water Facility Upgrades • **Mitigation Measure UT-1-B:** On-Site Water Facility Upgrades • **Mitigation Measure UT-1-C:** Wastewater Facility Upgrades • **Mitigation Measure HWQ-3:** Require a Site Survey To Verify Existing Drainage Capacity	Less than Significant

[a] Only cumulative impacts found to be significant are shown in this summary table. If not included in this table, impact is found to be less than significant.

Chapter 1
Introduction

1.1 California Environmental Quality Act

1.1.1 Purpose of this Environmental Impact Report

This Draft Environmental Impact Report (EIR) for the Shops at Tanforan Shopping Center (project) has been prepared by the project's lead agency, the City of San Bruno (City), in conformance with the provisions of the California Environmental Quality Act (CEQA) statute and CEQA Guidelines. The lead agency is the public agency with principal responsibility for carrying out or approving a project.

This Draft EIR assesses potentially significant impacts that could result from the project. As defined in CEQA Guidelines Section 15382, a significant effect on the environment is:

> …a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant.

As stated in the CEQA Guidelines, an EIR is an informational document. It is intended to inform public agency decision makers and the public of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to a project. The purpose of this Draft EIR is to provide the City, responsible and trustee agencies, other public agencies, and the public with detailed information about the environmental effects that could result from implementing the project; examine and set forth feasible methods of mitigating any adverse environmental impacts should the project be approved; and consider feasible alternatives to the project. The City will use the EIR, along with other information in the public record, to determine whether to approve, modify, or deny the project and specify any applicable environmental conditions or mitigation measures as part of the project approvals.

1.2 Intended Uses of the Environmental Impact Report

The purpose of this EIR is to assess and disclose the potential environmental impacts associated with the adoption and implementation of the project and to determine corresponding mitigation measures as necessary. The project is evaluated at a detailed project level in this EIR and is intended to be relied upon by the City of San Bruno to provide CEQA clearance for the approval and entitlement of the project. This EIR is also intended to provide CEQA clearance for review, approvals, or actions by other agencies or entities, as listed in Chapter 2, Section 2.8, *Other Potential Approvals*.

1.3 Project Overview

The 44-acre project site comprises the Tanforan Mall and a vacant parcel north of Sneath Lane. The mall property is currently developed with various retail uses, parking structures, and surface parking. The project site consists of a primary two-story mall building that includes three attached anchor stores. Two anchor stores are currently occupied by Hyundai of San Bruno (formerly Sears) and Target. The third anchor store is vacant as of May 2025 (formerly JC Penney). A three-level parking structure serving Target and a two-level steel structure are located in the southern portion of the project site. A Cinemark Century movie theater and an automotive service building are located in the northern portion of the project site. The movie theater sits atop a three-level parking structure. Directly east of and adjacent to the project site are the San Bruno Bay Area Rapid Transit (BART) station, a BART parking structure, and a joint BART/City police station.

The underlying purpose of the project is to redevelop the 44-acre project site with an economically viable development that combines residential uses, community-serving retail uses, and employment opportunities near transit and freeway access. As such, the project would redevelop the project site with a transit-oriented, mixed-use development including housing; retail uses; life-science laboratory uses; office uses; private and publicly accessible, privately owned open space; and potentially a hotel. The project would demolish all existing uses on the project site except for the Century at Tanforan Theater and its associated parking garage and the existing Target and associated parking garage. The project would construct new and relocated retail space, multifamily residential units, life-science laboratory and office uses, an amenity building, and underground and above-grade parking. The existing 81,500-square-foot Century at Tanforan Theater would be remodeled and incorporated into the project. The existing 189,600-square-foot Target facility and associated parking garage would also be incorporated into the project. In total, the project would construct approximately 2,169,041 to 2,330,461 square feet of net new development on the project site. Included in the project are 1,014 housing units with up to an additional 500 units in the project flex zones. The housing component would include up to 200 affordable housing units in a stand-alone building on the northern portion of the project site. If the additional 500 units are constructed, a percentage of those units would also be designated for affordable housing.

The project is organized with a programmed area and two “flex zones.” The programmed area would include 1,014 residential units in the northern portion of the project site, retail and community-serving uses in the central portion of the project site, and life-science, office, amenity, and parking uses in the southern portion of the project site. The flex zones would allow the development of a range of uses that may be constructed in these areas to provide flexibility for the multiyear project to respond to changing market conditions and user demand. The flex zones could be developed with a mix of life-science laboratory and office, residential, retail, and/or hotel uses. For purposes of the EIR analysis, two land use scenarios have been defined: Scenario A and Scenario B. Scenario A (Research and Development [R&D] Scenario) assumes the flex zones would be predominantly built out with life-science laboratory and office uses, with some amenity uses. Scenario B (Residential Scenario) assumes that the flex zones would be built out with up to 500 additional residential units with some life-science laboratory and office uses, some retail uses, some amenity uses, and potentially a hotel use. The programmed area (non-flex zone area) would remain the same in both scenarios. A detailed description of the project is provided in Chapter 2, *Project Description*.

1.4 California Environmental Quality Act Process

1.4.1 Notice of Preparation and Scoping Meeting

The term *scoping* refers to the process used to assist the lead agency in determining the focus and content of an EIR. Scoping solicits input on the potential topics to be addressed in an EIR, the range of project alternatives, and possible mitigation measures. Scoping is also helpful in establishing methods of assessment and selecting the environmental effects to be considered. The scoping process for this EIR was initiated on December 15, 2023, when the City submitted the Notice of Preparation (NOP) to the California State Clearinghouse for distribution to the necessary parties. The NOP is included as Appendix 1-1, *Notice of Preparation and Comments Received on the Notice of Preparation*, of this Draft EIR. The purpose of the NOP is to solicit participation from relevant agencies and from the public in determining the scope of an EIR. The scoping period for this EIR ended on January 17, 2024, and a public scoping meeting was held on January 16, 2024, at the San Bruno Senior Center (1555 Crystal Springs Road, San Bruno, California 94066).

The following agencies and organizations submitted written responses to the NOP.

- U.S. Department of Transportation, Federal Aviation Administration, Western-Pacific Region
- California Department of Toxic Substances Control
- California Native American Heritage Commission
- California Department of Fish and Wildlife, Bay Delta Region
- California Department of Transportation, District 4
- California Department of Transportation, Aeronautics Program
- City/County Association of Governments of San Mateo County
- San Francisco Public Utilities Commission, Water Enterprise
- San Francisco BART District
- San Francisco International Airport

In addition, verbal comments were received from San Bruno Planning Commission Vice Chair Rick Biasotti, Planning Commissioner Auros Ansbergs Harman, and Planning Commissioner Kelly Lethin at the scoping meeting.

Comments received during the scoping process, including a transcript of the scoping meeting, are included in Appendix 1-1, *Notice of Preparation and Comments Received on the Notice of Preparation*, and are on file at the City of San Bruno Community Development Department (567 El Camino Real, San Bruno, California 94066).

1.5 Content of this Draft Environmental Impact Report

Pursuant to CEQA (Public Resources Code [PRC] Section 21000 et seq.) and CEQA Guidelines Section 15064, the discussion of potential effects on the environment in the EIR are focused on those impacts that the City has determined may be potentially significant. The EIR also evaluates the cumulative impacts of the project when considered in conjunction with other related past, current, and reasonably foreseeable future projects. CEQA requires that the discussion of any significant effect on the environment be limited to substantial, or potentially substantial, adverse changes in physical conditions that exist within the affected area, as defined in PRC Section 21060.5 (statutory definition of "environment").

The City has determined that the project could result in potential environmental impacts in the following topic areas, which are evaluated in the EIR.

- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology, Soils, and Paleontology
- Greenhouse Gases
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use
- Noise and Vibration
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities

CEQA allows a lead agency to limit the detail of discussion of the environmental effects that are not considered potentially significant (PRC Section 21100, California Code of Regulations Sections 15126.2[a] and 15128). Environmental issue areas that were dismissed from further consideration in the EIR are aesthetics, agriculture and forestry resources, mineral resources, and wildfire. A detailed analysis of these topics is, therefore, not included in this Draft EIR. Refer to Chapter 3, *Environmental Impact Analysis*, for further discussion.

1.5.1 Draft Environmental Impact Report

1.5.1.1 Impact Analysis

This Draft EIR analyzes significant effects that could result from the project. As explained in CEQA Guidelines Section 15002(g), a significant effect on the environment is defined as a substantial adverse change in the physical conditions that exist in the area affected by a project. Pre-project environmental conditions (the environmental baseline) are considered in determining impact significance. The impact significance thresholds for each environmental resource area presented in this Draft EIR are based on CEQA Guidelines Appendix G, *Environmental Checklist Form* (supplemented or revised as appropriate to fit the project). Where significant impacts are identified, the Draft EIR recommends feasible mitigation measures to reduce, eliminate, or avoid the significant impacts and identifies which impacts remain significant and unavoidable despite the mitigation measures. Cumulative impacts (i.e., two or more individual effects, either from a single project or from two or more separate projects, that, when considered together, compound or increase other related environmental impacts) are discussed for each environmental resource area in Chapter 5, *Other CEQA Considerations*. Alternatives to the project are discussed in Chapter 4, *Alternatives*.

In accordance with CEQA Guidelines Section 15143, this Draft EIR analyzes the significant effects on the environment that could result from construction and operation of the project. CEQA Guidelines Section 15131 specifies that "…the intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes." Therefore, this Draft EIR does not treat economic or social effects of the project as significant effects on the environment, unless they result in physical changes to the environment. In addition, if it is determined that a potential impact is too speculative for evaluation, this condition is noted, and further discussion of the impact is not necessary.

1.5.1.2 Public Review

This Draft EIR is considered a draft under CEQA because it must be reviewed and commented upon by public agencies, organizations, and individuals before being finalized. This document is being distributed for a 45-day public review and comment period. Readers are invited to submit written comments on the document. Comments are most helpful when they suggest specific alternatives or measures that would mitigate significant environmental effects better or raise specific questions about the details in the Draft EIR. Hard copies of the Draft EIR are available for review at the below locations.

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

Monday through Friday
8:00 a.m.–5:00 p.m.

San Bruno Public Library
701 Angus Ave W
San Bruno, CA 94066

Monday through Thursday, 10:00 a.m.–8:00 p.m.
Friday, 10:00 a.m.–6:00 p.m.
Saturday, 10:00 a.m.–5:00 p.m.

Electronic copies of the Draft EIR are available for review online at https://tanforanforsanbruno.com/.

The 45-day public review period for the Draft EIR is from June 27, 2025 to August 11, 2025. Written comments should be submitted during this review period to the following address.

City of San Bruno Community Development Department
Attn: Peter Gilli
567 El Camino Real
San Bruno, CA 94066
Email: Tanforan@sanbruno.ca.gov

To receive comments on the Draft EIR, a public hearing will be held as noted below. Hearing notices will be mailed to responsible agencies and interested individuals.

Public Review Community Meeting
Tuesday, July 29, 2025, 6:00 p.m.

San Bruno City Hall, Conference Room 115
567 El Camino Real
San Bruno, CA 94066
Zoom Link: https://sanbruno-ca-gov.zoom.us/j/82819768157 (No public comment accepted via Zoom)

1.5.1.3 Final Environmental Impact Report and Project Approval

Following the close of the public review period, the City will prepare responses to all substantive comments related to potential physical changes to the environment. The Draft EIR, along with the written and oral substantive comments received during the review period, as well as responses to those comments, will make up the Final EIR. The Final EIR will be considered by the Planning Commission when making the decision whether to recommend that the City Council certify the Final EIR and then approve or deny the project. The City Council is the final decision-making body regarding the project-specific legislative actions (e.g., Development Agreement, General Plan Amendment, and Planned Development Zoning) and certification of the Final EIR for the project. Discretionary development entitlements (e.g., tentative map and Planned Development Permits) may be bundled with the legislative actions. Subsequent applications (e.g., subdivisions, Planned Development Permits, or amendments to prior subdivisions or Planned Development Permits) will be processed based on the Planned Development Zoning adopted by the City Council. Chapter 2, *Project Description*, provides a detailed description of the discretionary approvals and other permits by the City and responsible or other agencies that are anticipated to be required for implementation of the project. Certification of the Final EIR by the City Council as complete and adequate, in conformance with CEQA, does not grant any land use approvals or entitlements for the project. The merits of the project will be considered by the City Council following certification of the Final EIR. The CEQA Guidelines require that, for one or more significant and unavoidable impacts that cannot be substantially mitigated, a lead agency must prepare a Statement of Overriding Considerations that balances the social, economic, technological, and legal benefits of approving a project against the significant and unavoidable environmental impacts that would result from project implementation. If significant and unavoidable impacts are identified, the City Council will consider the Statement of Overriding Considerations for the project.

1.6 Draft Environmental Impact Report Organization

This Draft EIR is organized into the following chapters.

- **Executive Summary.** The Executive Summary provides a summary of the project and the impacts that would result from implementation of the project, along with mitigation measures recommended to reduce, eliminate, or avoid significant impacts. The Executive Summary also discusses alternatives to the project.
- **Chapter 1, *Introduction*.** Chapter 1 discusses the overall purpose of the EIR, provides a summary of the project and the CEQA process, and summarizes the organization of the EIR.
- **Chapter 2, *Project Description*.** Chapter 2 describes the project site, project objectives, required approvals process, and project characteristics (including the two land use scenarios identified and evaluated for EIR purposes).
- **Chapter 3, *Environmental Impact Analysis*.** Chapter 3 describes the existing conditions/setting, analyzes the environmental impacts, and provides mitigation measures (if applicable) for each environmental resource area. For each resource area studied, the EIR evaluates the "worst case" land use scenario (i.e., the scenario with the greatest potential to result in a significant environmental impact).
- **Chapter 4, *Alternatives*.** Chapter 4 evaluates alternatives to the project, in addition to the No-Project Alternative, and explains why various other alternatives that were considered were not carried forward for detailed evaluation in the EIR.
- **Chapter 5, *Other CEQA Considerations*.** Chapter 5 provides additional discussions required under CEQA, including significant and unavoidable impacts, significant irreversible changes (including energy and the consumption of non-renewable resources), growth-inducing impacts, and cumulative impacts.
- **Chapter 6, *List of Preparers*.** Chapter 6 lists the authors of the EIR, as well as persons and organizations that were consulted during the preparation of the EIR.
- **Draft EIR Appendices.** Appendices are referenced throughout the EIR and included as attachments..

Chapter 2
Project Description

2.1 Project Overview

This project description provides a general overview of the proposed redevelopment of the Shops at Tanforan Shopping Center (project), including the project location, project setting, intended uses of the Environmental Impact Report (EIR), project objectives, project characteristics, and required project approvals. As described in this project description, ARE-San Francisco No.96, LLC (project applicant) proposes to redevelop the 44-acre Shops at Tanforan Shopping Center (also referred to locally as the Tanforan Mall) including a parcel north of Sneath Lane (project site) with a transit-oriented, mixed-use development including housing; retail uses; life-science laboratory uses; office uses; private and publicly-accessible, privately-owned open space; and potentially a hotel. The project site is located in the City of San Bruno and the City is the lead agency for the project under the California Environmental Quality Act (CEQA).

2.2 Project Location

2.2.1 Regional Location

San Bruno is a 5.5 square-mile (3,500-acre) city located in San Mateo County on the eastern side of the San Francisco Peninsula. As shown in Figure 2-1, Regional Location Map, San Bruno is located approximately 12 miles south of San Francisco, immediately north of the City of Millbrae and west of the San Francisco International Airport (SFO), bounded by Highway 101 on the east and the Coast Range on the west. San Bruno is a largely residential city with a population of 42,405 (State of California Department of Finance 2023). Founded as a railroad suburb in 1914, San Bruno has grown to incorporate a variety of urban and commercial uses. The older, eastern half of San Bruno contains a diversity of land uses and residential types, while the western half is comprised mostly of single-family subdivisions. The City is connected to major transportation corridors by Highway 101, Interstates 280 (I-280) and 380 (I-380), and El Camino Real. The downtown area is centered along San Mateo Avenue from El Camino Real to San Bruno Avenue.

2.2.2 Project Site

As shown in Figure 2-2, Project Site Location, the project site is generally bounded by Sneath Lane to the north, Huntington Avenue to the east, Interstate 380 (I-380) to the south, and El Camino Real (State Route 82) to the west. The project site also includes a vacant parcel north of Sneath Lane between Huntington Avenue and Maple Avenue. Directly east of and adjacent to the project site are the San Bruno Bay Area Rapid Transit (BART) station, the SamTrans Transit Center, a BART parking structure, and a joint BART/City police station. Existing commercial uses are located north of the project site; single-family residential uses and commercial uses in the City of South San Francisco are located to the east; I-380 is located to the south, with residential uses on the south side of I-380; and commercial uses, multi-family residential uses, and the Golden Gate National Cemetery are located to the west.

2.3 Setting

2.3.1 Existing Land Use

The 44-acre project site includes six parcels (APNs 014-316-080, 014-316-300, 014-316-310, 014-316-360, 014-316-330, and 014-316-060) at the addresses 1122, 1150, 1178, 1188 El Camino Real and 300 Tanforan Shopping Center in San Bruno (see Figure 2-3, Existing Parcels). The project site is comprised of the Tanforan Mall and a vacant parcel north of Sneath Lane. The mall property is currently developed with various retail uses, parking structures, and surface parking. The project site consists of a primary two-story mall building that includes three attached anchor stores. Two are currently occupied by Hyundai of San Bruno (formerly Sears) and Target. The third anchor store is vacant as of May 2025 (formerly JCPenney). A three-level parking structure serving Target and a two-level steel structure are located in the southern portion of the project site. A Cinemark Century movie theater and an automotive service building are located in the northern portion of the project site. The movie theater sits atop a three-level parking structure. Table 2-1 summarizes key details of the existing uses on the project site.

Existing parking on the project site includes various surface parking lots surrounding the Tanforan Mall and three parking structures. A total of 4,034 parking spaces are provided, including 1,647 surface spaces and 2,387 structured spaces (including 743 spaces in the Cinemark parking structure, 1,378 spaces in the Target parking structure, and 266 spaces in the steel parking structure).

Table 2-1. Summary of Existing Land Uses on the Project Site

Address	APN	Lot Size (acres)	Land Use	Building Size (sf)	Year Built	Building Height (feet)[1]
1178 El Camino Real	014-316-330	11.46	Retail (Hyundai of San Bruno), automobile service center	234,191	1972	60
1122 El Camino Real	014-316-300	15.33	Retail (JC Penney)	186,016	1970-1975	42
N/A	014-316-060	1.42	Vacant Lot (north of Sneath Lane)	N/A	N/A	N/A
1150 El Camino Real/300 Tanforan Way	014-316-080	1.52	Retail (Target)	189,571	1970-1975	79.6
1188 El Camino Real	014-316-310	2.22	Retail (Cinemark Century Movie Theater)	75,800	2005-2009	79.6
1150 El Camino Real	014-316-360	12.04	Retail (Tanforan Mall)	365,282	1970-1975	60

[1] Building height is defined by the City's municipal code and is the distance from the highest surrounding grade within five feet of the building to the highest point of the coping of a flat roof.

sf = square feet, ft = feet, in = inches

Source: ARE San Francisco No.96, LLC, 2024.

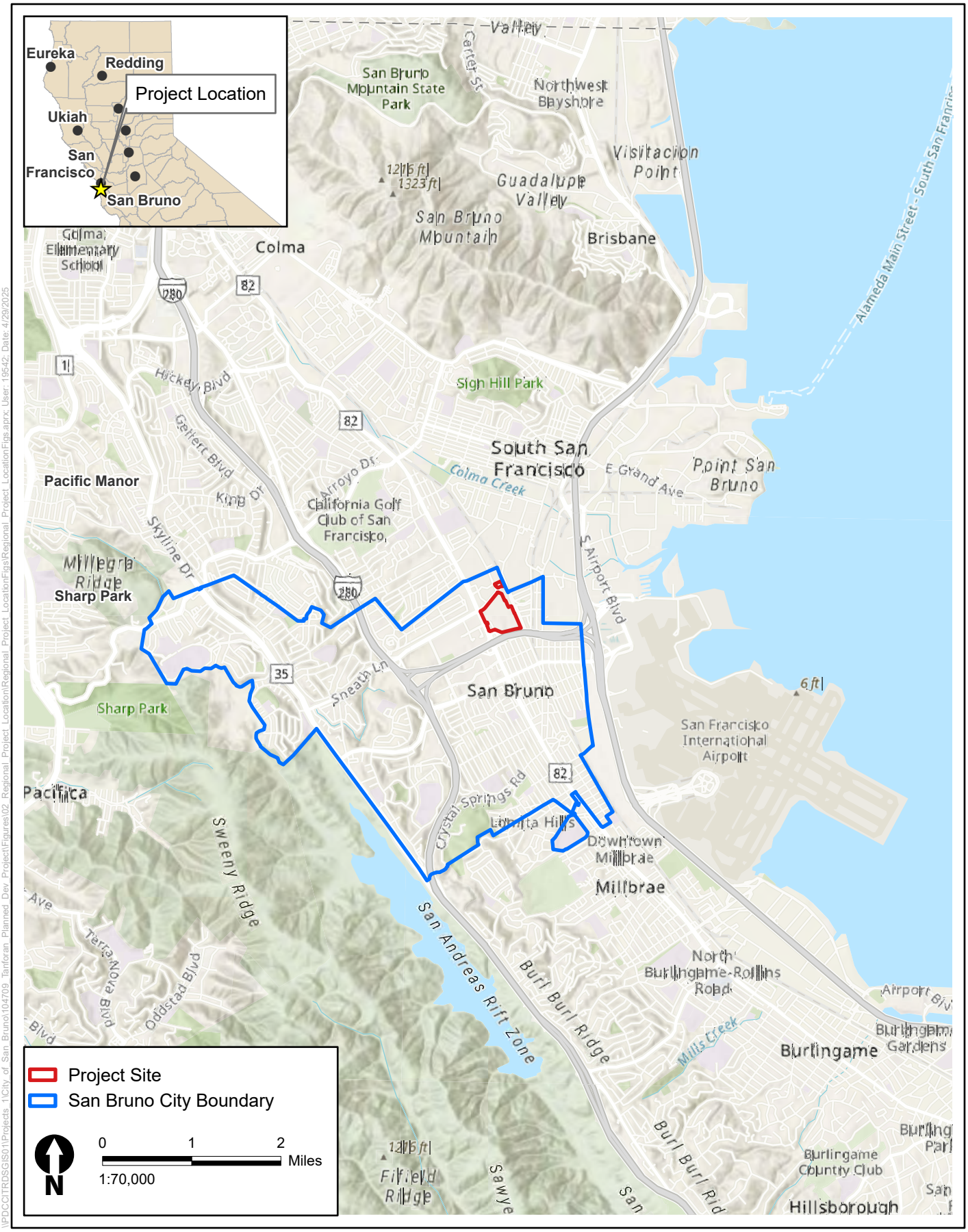

Figure 2-1
Regional Location Map

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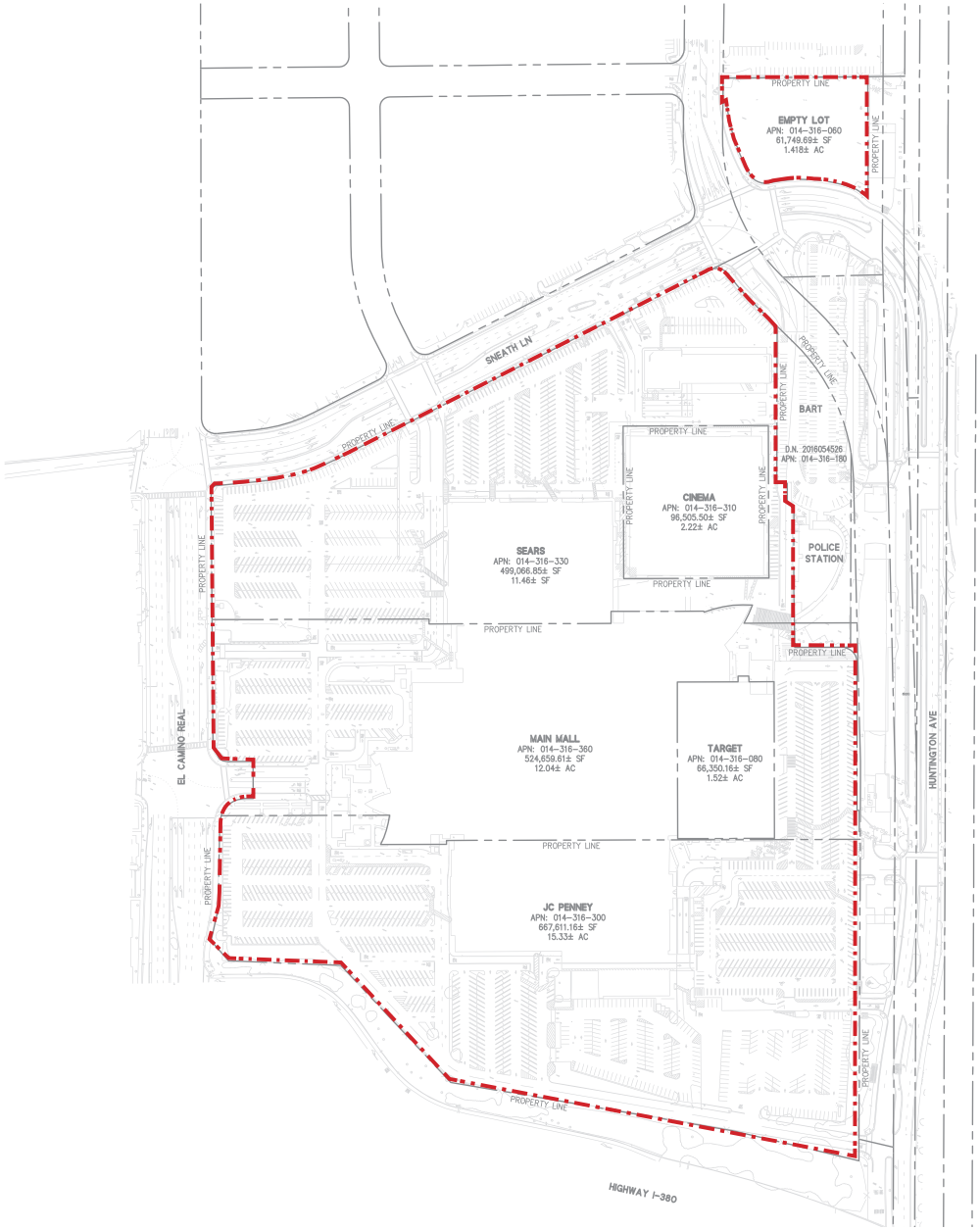
Figure 2-2
Project Site Location



Source: BFK Engineers, 2022

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Figure 2-3
Existing Parcels

A Japanese garden designed by landscape artists Isao Ogura and Shigeru Namba is adjacent to the existing mall's southwest entrance, as shown in Figure 3.3-1 in Section 3.3, *Cultural Resources*. The garden commemorates the signing of Executive Order 9066 and the resulting internment of people of Japanese ancestry in the United States. A plaque is located at the garden identifying the site as California Historical Landmark (CHL) No. 934 – Temporary Detention Camps for Japanese Americans-Tanforan Assembly Center in San Mateo County, one of 11 extant sites across 10 counties included in the CHL No. 934 designation and typically marked by state- or privately-funded plaques or other identifying markers. Plaques or markers identifying a registered historical resource are at the discretion of the property owner(s), and can be purchased using private funds or a request of an official State plaque. All sites associated with CHL No. 934 were registered to the California Historical Landmarks program through one nomination form in May 1980. CHLs No. 770 and above are automatically listed in the California Register of Historical Resources (California Historical Landmarks 2016; California Office of Historic Preservation 2025). As discussed in Section 3.3, *Cultural Resources*, Mitigation Measure CUL-1 requires the project to relocate and incorporate the existing memorial plaque and commemorative garden on the property.

As shown in Figure 2-4, Existing Land Use, and Figure 2-5, Existing Zoning, the southern portion of the main project site is designated as Regional Commercial, with the northern portion of the main project site and the adjacent parcel across Sneath Lane are designated as Transit-Oriented Development in the City's General Plan. The Regional Commercial designation corresponds with a Planned Development (P-D) zoning district. The P-D zoning[1] district allows a mixture of uses, or unusual density, building intensity, or design relationships which will produce an environment and use of land in each case superior to that which would result from the regulations of the standard districts or combination of districts. All uses within this district are conditional uses, therefore any and all compatible land uses consistent with the City's General Plan are conditional uses in a P-D district, provided such use or uses have been designated on a development plan and approved by the planning commission and city council pursuant to the provisions of this section. Conditional uses may be authorized by the approval of a planned development permit.

As discussed in Section 3.9, *Land Use*, the existing P-D zoning district on the project site was established in 1966 under Ordinance No. 1087 to allow for the existing mall uses currently on the site. As part of implementing its Housing Element Update in 2024, the City amended the P-D zoning district to extend it to the parcel north of Sneath Lane and allow for multi-family residential uses (Ordinance Nos. 1954 and 1955, adopted by the San Bruno City Council on September 10, 2024).

As shown in Figure 2-6, Priority Development Areas, the project site is located in the Transit Corridors Priority Development Area (PDA) as identified by the Metropolitan Transportation Commission (MTC) and Association of Bay Area Government's (ABAG) *Plan Bay Area 2050* (Metropolitan Transportation Commission 2021a). The project site is also in a Transit Priority Area (TPA) (Metropolitan Transportation Commission 2021b). A TPA is an area within 0.5 mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program or applicable regional transportation plan (PRC Section 21099 (a)(7)). These designations indicate that the project site is an appropriate location for infill development near transit. For further discussion, see Section 3.9, *Land Use*.

[1] San Bruno Municipal Code Section 12.96.190 established P-D zoning as allowing a mixture of uses, unusual density, building intensity, or design relationships which will produce a superior environment or use of land.

2.3.2 Existing Utilities and Easements

Existing utilities within and near the project site are shown in Figures 3.16-1 through 3.16-3 in Section 3.16, *Utilities and Service Systems*. The project site is served by a system of 10-inch and 12-inch pipes that supply potable water to the project site. These include 10-inch pipes in the northern portion of Huntington Avenue and 12-inch pipes in Sneath and the southern portion of Huntington Avenue. Water is then conveyed into the project site through water conveyance pipelines located on all sides of the site.

Regarding wastewater, the project site is served by City-owned sewers located within Sneath Lane and El Camino Real, which extend through the project site. In addition, an existing 24-inch trunk sewer runs north through the project site from the I-380 interchange to a 24-inch sewer in Sneath Lane, located approximately 300 feet east of El Camino Real. The existing 24-inch trunk sewer in Sneath Lane continues east to Huntington Avenue and then follows Tanforan Avenue. Sewer flows from the project site are currently conveyed northwest via several connection points that discharge into the 24-inch gravity pipe at Tanforan Avenue. The flows are then conveyed west into the Shaw Road Pump Station via 24-inch to 27-inch gravity pipes. Sewage is ultimately pumped into the South San Francisco/San Bruno Water Quality Control Plant via 28-inch and 42-inch force mains that run under Highway 101.

The existing storm drain network at the project site includes multiple connections to the City's storm drain system. The project site drains southeast into the City's storm drain under I-380 and northeast through Huntington Avenue towards the City of South San Francisco's storm drain. The existing storm drain network circles the project site and includes outlet connections in the southwest, southeast, and northeast corners of the site.

Electric and gas service is provided by Pacific Gas & Electric (PG&E). A network of 5-foot and 7-foot PG&E easements traverses the project site. Refer to Section 3.16, *Utilities and Service Systems*, for a detailed discussion of exiting utility infrastructure that serves the project site.

There are no San Francisco Public Utilities Commission (SFPUC) easements within the project site. However, adjacent to the project site within the El Camino Public Right of Way is SFPUC's San Andreas No. 1 water transmission pipeline easement. Any earthwork involving digging or excavation to this area would require additional review by SFPUC prior to construction. As shown in Figure 2-7, Existing Easements, several other easements are located in and around the project site. PG&E maintains a utility easement running north/south at the north eastern portion of the project site, as well as 10-foot, 7-foot, 5-foot, and 2.5-foot easements running through the mall structure. Public utility easements run north/south and the west side of the project site, just east of El Camino Real, and from Sneath Lane to the center of the existing mall structure. A BART Zone of Influence surrounds the BART tunnel along Huntington Ave.

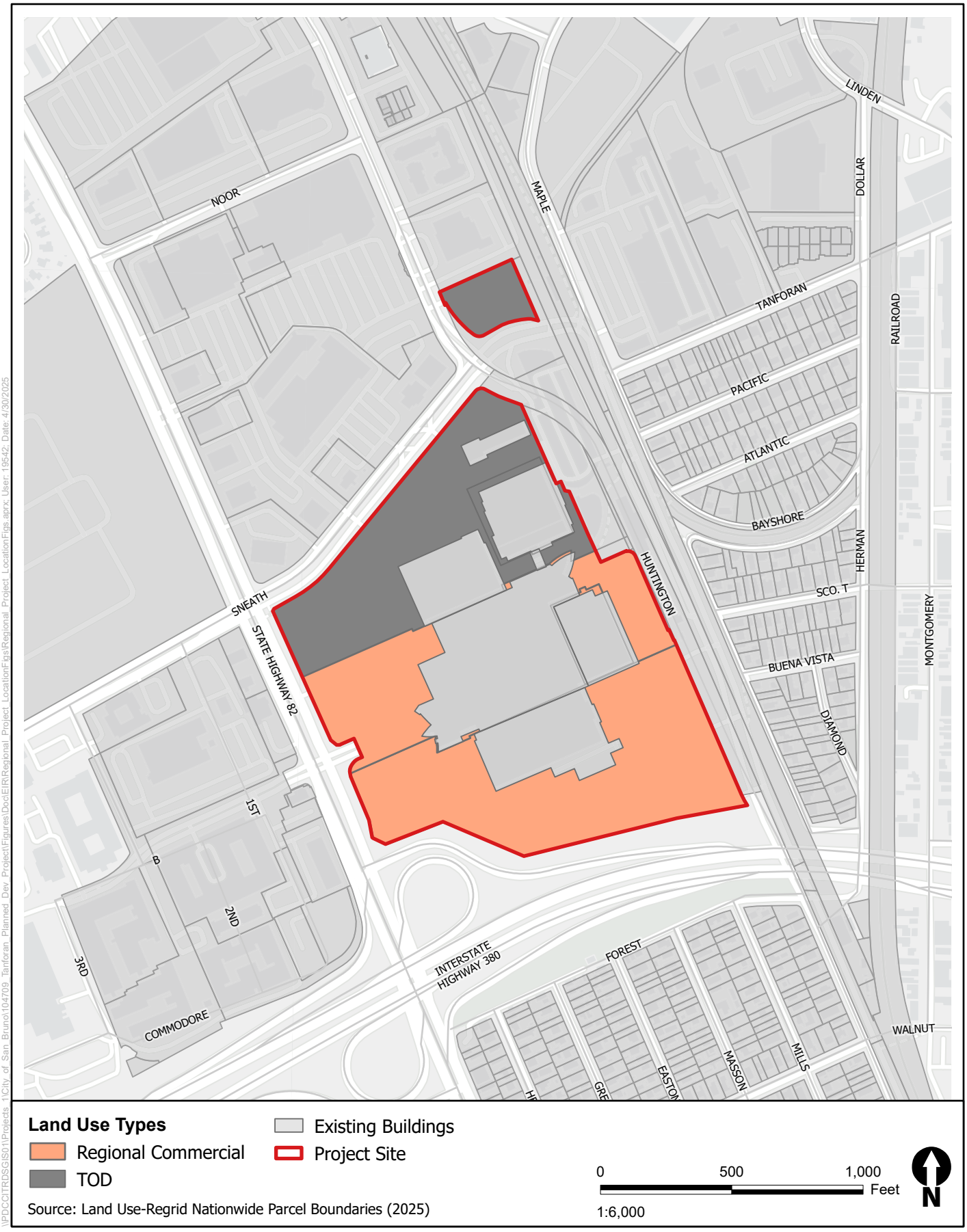

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Figure 2-4
Existing Land Use

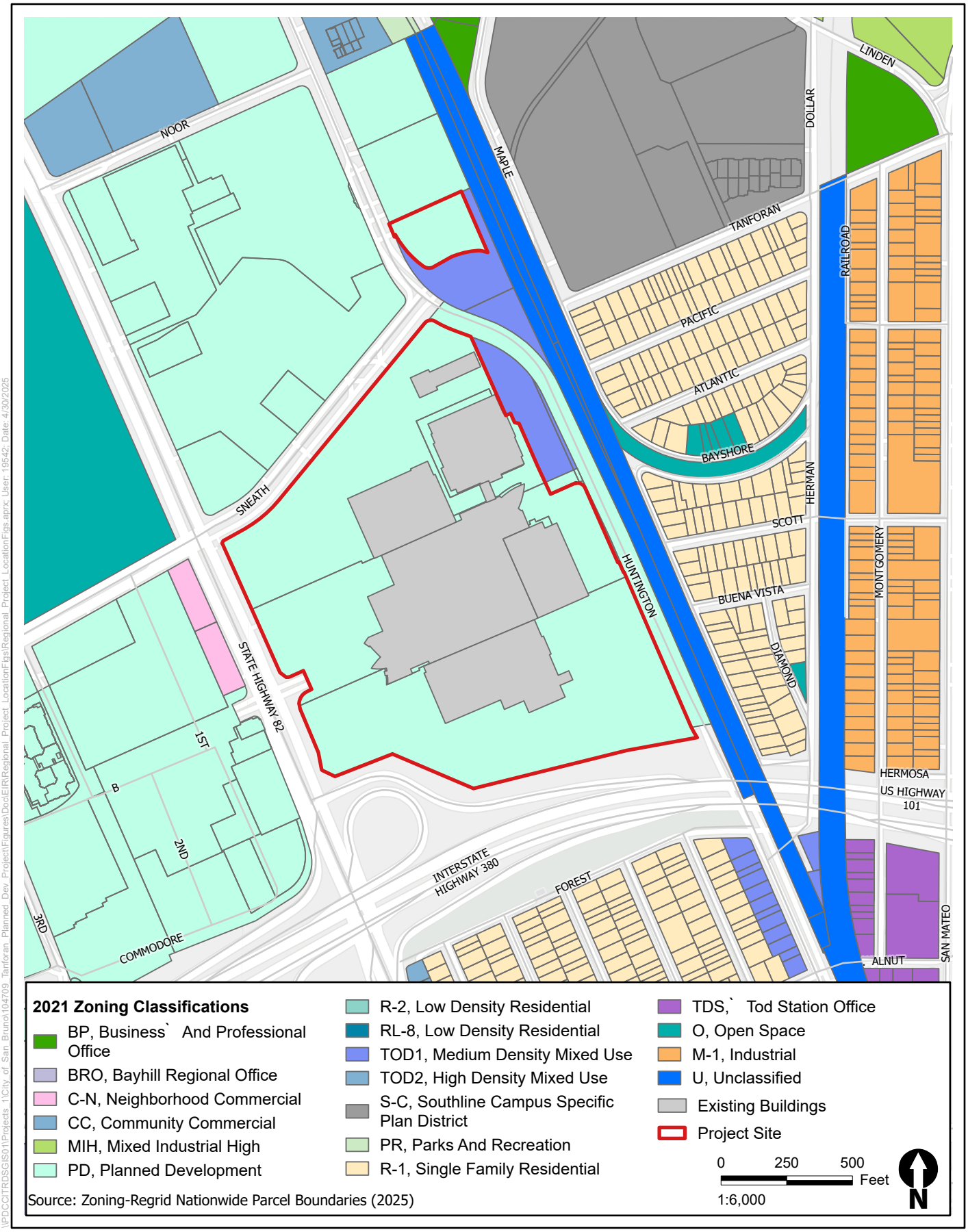

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Figure 2-5
Existing Zoning

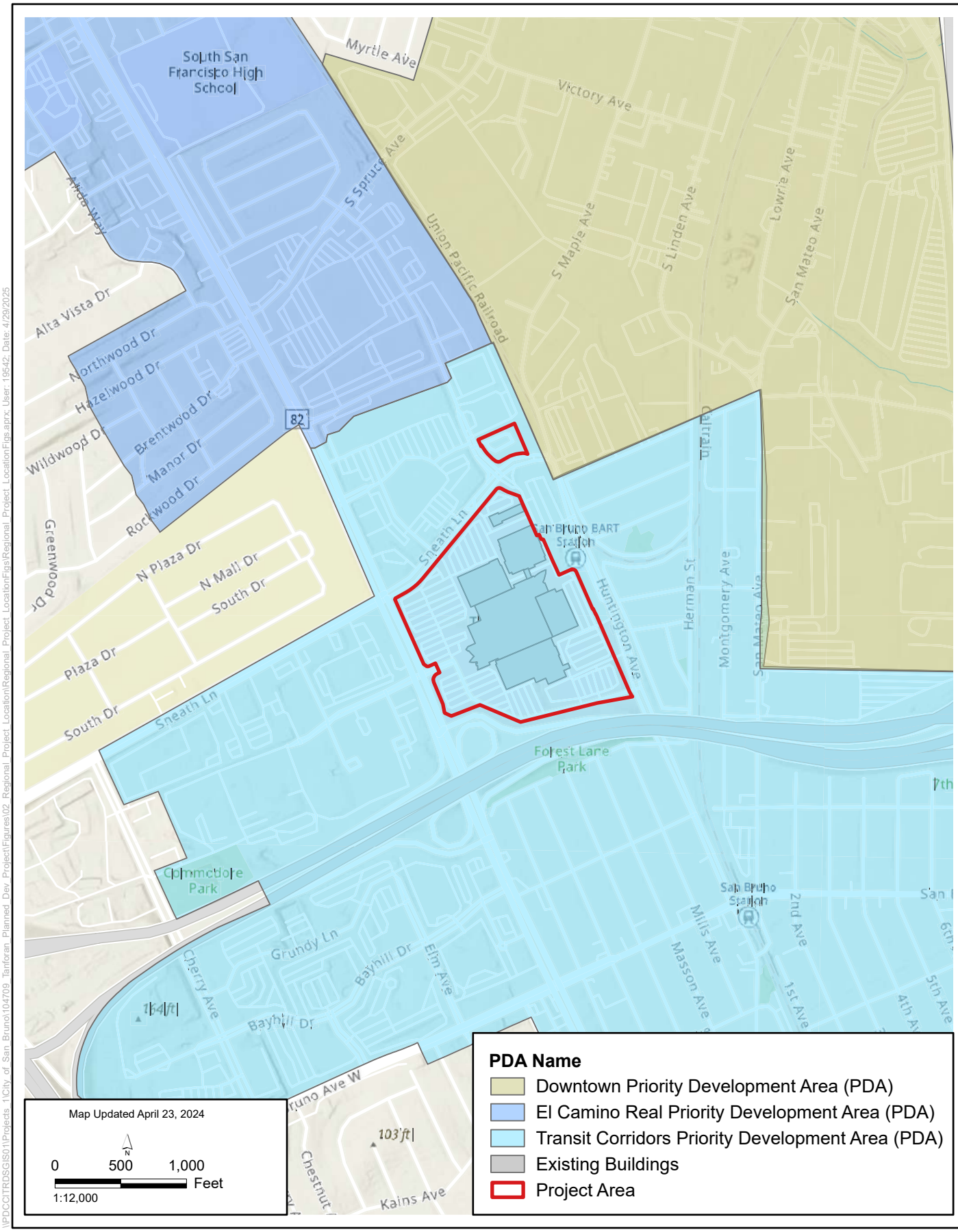
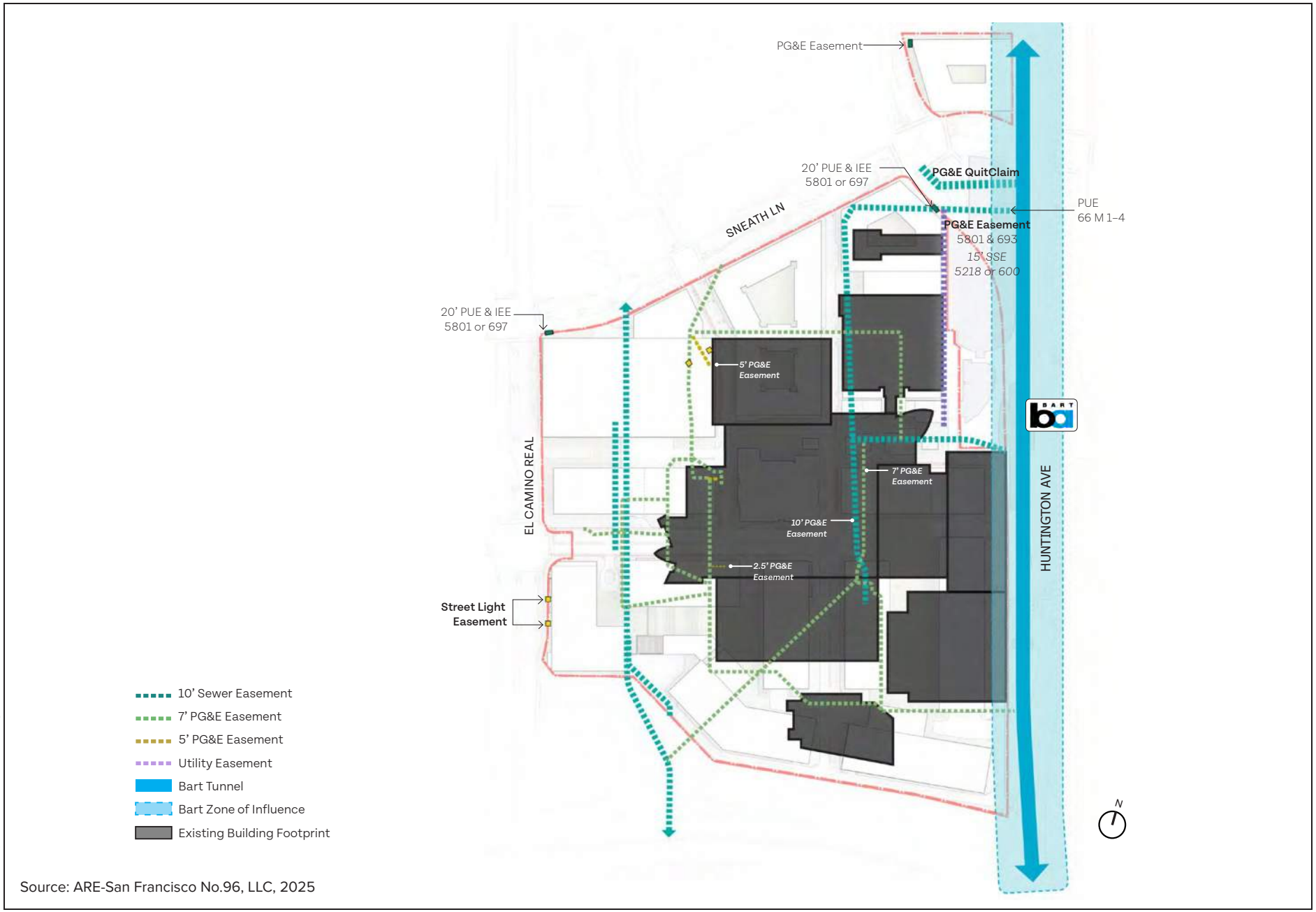


Figure 2-6
Priority Development Areas



Source: ARE-San Francisco No.96, LLC, 2025

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Figure 2-7
Existing Easements

2.3.3 Existing Circulation

Existing roadway circulation routes surrounding the project area include four prominent regional routes: US-101, I-280, I-380, and SR 82/El Camino Real. The local roadway circulation system serving the project site includes Sneath Lane, Huntington Avenue, Tanforan Way/Commodore Drive (privately-owned), and Seabiscuit Avenue (privately-owned). While there are no public transit stops within the project site, there are multiple public transit stops within a block of the site, including bidirectional stops on El Camino Real, Huntington Avenue, and Sneath Lane. The San Bruno BART station is directly adjacent to the project site and the San Bruno Caltrain station is a half mile walk from the southern edge of the project site. Bus service near the project site is provided along San Bruno Avenue, SR 82/El Camino Real, Sneath Lane, Huntington Avenue, and I-380. El Camino Real is an active bus corridor, particularly for regional bus travel. SamTrans' El Camino Real route, from Daly City BART to the Palo Alto Transit Center, is the most frequent route serving the project site. Sidewalks are provided on one side of Tanforan Way and partially on Seabiscuit Avenue within the project site, as well as on both sides of SR 82/El Camino Real, Huntington Avenue, and Sneath Lane. Class II bicycle lanes are provided along Sneath Lane east of Seabiscuit Avenue, and a small stretch of Commodore Drive, west of the project site.

2.3.4 Surrounding Uses

Existing commercial uses are located north of the project site; single-family residential uses and commercial uses in the City of South San Francisco are located to the east; I-380 is located to the south; and commercial uses, multi-family residential uses, and the Golden Gate National Cemetery are located to the west.

Existing land uses surrounding the project site are described below based on their general location near the project site:

- **North of Sneath Lane:** The area north of Sneath Lane, surrounding the project site is the San Bruno Towne Center which is a commercial/retail shopping area consisting of several large retailers (e.g. Marshalls and Lowes), other office uses (Chase Bank), retail establishments, and fast-food restaurant chains. The parcel directly north of the project site parcel contains a U.S. Post Office (1300 Huntington Ave). The entirety of this area is developed and includes small areas of landscaping (trees, shrubs, and groundcover).
- **West of El Camino Real/State Route 82 (SR-82):** The area west of the project site is surrounded by retail establishments and restaurants. West of El Camino Real is the Golden Gate National Cemetery, the San Bruno Pet Hospital, and a mix of multi-family, office, commercial, government, and religious buildings.
- **East and Northeast of Huntington Avenue:** The area east of the project site adjacent to Huntington Avenue primarily consists of single-family residences, community walking trails, and open space areas. The area northeast of Huntington Avenue includes large industrial warehouses and parking lots that will be demolished for construction of the approved Southline Project in the City of South San Francisco. Construction has commenced on Phase 1 of the Southline Project, which will include office, life science, and amenity uses.
- **South of Interstate 380 (I-380):** The area south of I-380 includes Forest Lane Park and single-family residential uses.

2.4 Intended Uses of the EIR

The purpose of this EIR is to assess and disclose the potential environmental impacts associated with the adoption and implementation of the proposed project and to determine corresponding mitigation measures as necessary. The proposed project is evaluated at a detailed project level in this EIR and is intended to be relied upon by the City of San Bruno to provide CEQA clearance for the approval and entitlement of the proposed project. At initial approvals, the proposed project would obtain a Planned Development Plan for the entire project site, and a Planned Development Permit for three life science laboratory and office buildings, and one residential building. If the project is approved, this EIR will be used for those initial approvals as well as future Planned Development Permits for additional buildings. This EIR is also intended to provide CEQA clearance for review and/or approvals or actions by other agencies or entities, as listed in Section 2.8, *Other Potential Approvals*, of this chapter.

2.5 Project Objectives

Section 15124(b) of the CEQA Guidelines requires that a project description contain a clear statement of the project objectives, including the underlying purpose of the project. The underlying purpose of the proposed project is to redevelop the 44-acre project site with an economically viable development that combines residential uses, community-serving retail uses, and employment opportunities near transit and freeway access. Project objectives include the following:

- Plan and develop a high-quality mixed-use redevelopment and revitalization of the Shops at Tanforan site.
- Provide a mix of uses including commercial office uses, research and development uses, residential uses, commercial retail uses, and/or a hotel use, and a mix of open space including publicly accessible open space, in a transit-oriented, urban infill location.
- Incorporate flexibility in the plan's phasing and buildout that would be accomplished through flex zones that allow for different mixes of uses resulting in a project that is responsive to tenant, customer, and expected user demands based on market conditions.
- Develop the site at an intensity and density that takes advantage of the transit resources in the area and allows the project to remain financially feasible while delivering onsite affordable housing, open space, community-serving retail and other public benefits and community amenities.
- Create a development plan that accommodates existing long-term ground-lease tenants.
- Establish vibrant gathering spaces and connected retail spaces to encourage neighborhood-serving retail, that provide shopping, eating and relaxing opportunities to residents and tenants of the project, as well as the larger San Bruno community.
- Increase the City of San Bruno's housing supply in support of its Regional Housing Needs Allocation (RHNA) obligations, through the creation of a mixed-use, mixed-income community that includes a minimum of approximately 1,000 residential units, consistent with the City of San Bruno's Housing Element, and a mix of market-rate and below-market-rate units.

- Create vibrant, state-of-the-art research and development and office facilities that support additional job growth, enhance property values, and generate property tax and development fees.
- Contribute to increased community recreation, and multi-modal connectivity through inclusion of on-site privately-owned, publicly accessible open spaces while enhancing linkages to the community's pedestrian and bicycle network, and improved pedestrian access to the San Bruno BART station.
- Produce high-quality architectural and landscape design that encourages variety and authenticity as well as compatible and or complementary with its surrounding context and will contribute to the San Bruno community.
- Create a transit-oriented development that is committed to sustainable design and programming through its transportation demand management, efficient building systems, and use of environmentally conscious construction materials and methods.
- Create a thriving mixed-use, transit-oriented project that locates housing near jobs and existing transit corridors and public transportation facilities that includes off-street parking for residential, retail, and office and research and development uses to meet the project's needs.
- Celebrate the site's history by providing for the appropriate relocation of historic and cultural elements.
- Create a cohesive campus-like environment by providing sufficient space for tenants to employ key scientific and business personnel in proximity to each other to foster efficient collaboration and productivity.
- Provide a development and infrastructure plan that can be built in phases to best respond to market demand and changing conditions.

2.6 Project Characteristics

2.6.1 Project Summary

The project would establish a new P-D zone on the project site to facilitate the redevelopment of the 44-acre Tanforan Mall and the parcel north of Sneath Lane. The new P-D zoning would allow for the development of a transit-oriented, mixed-use development including housing; retail uses; life-science laboratory uses; office uses; private and publicly-accessible, privately-owned open space; and potentially a hotel. The project would demolish all existing uses on the project site except for the Century at Tanforan Theater, the Target, and their associated parking garages. In total approximately 785,489 square feet of existing retail uses would be demolished. The project would construct approximately 111,950 to 211,950 square feet of new retail space with underground and above-grade parking, approximately 1,014 to 1,514 multi-family residential units with underground and above-grade parking, approximately 1,174,000 to 1,723,580 square feet of life-science laboratory and office uses, and approximately 55,000 to 69,000 square feet of amenity uses that would also include above-grade parking. The project could also construct a 125,000-square foot, 170-room hotel. The existing 75,800-square foot Century at Tanforan Theater would be remodeled and incorporated into the project, and the existing Target would remain. The above-ground parking structures serving the Century at Tanforan Theater and Target would also remain. The housing

component would include up to 200 affordable housing units in a stand-alone building on the northern portion of the project site. In total, the project would construct 2,169,041 to 2,330,461 square feet of net new development on the project site. A conceptual site plan is shown in Figure 2-8, Conceptual Site Plan. Artistic depictions of the project are shown in Figure 2-9, Conceptual Renderings.

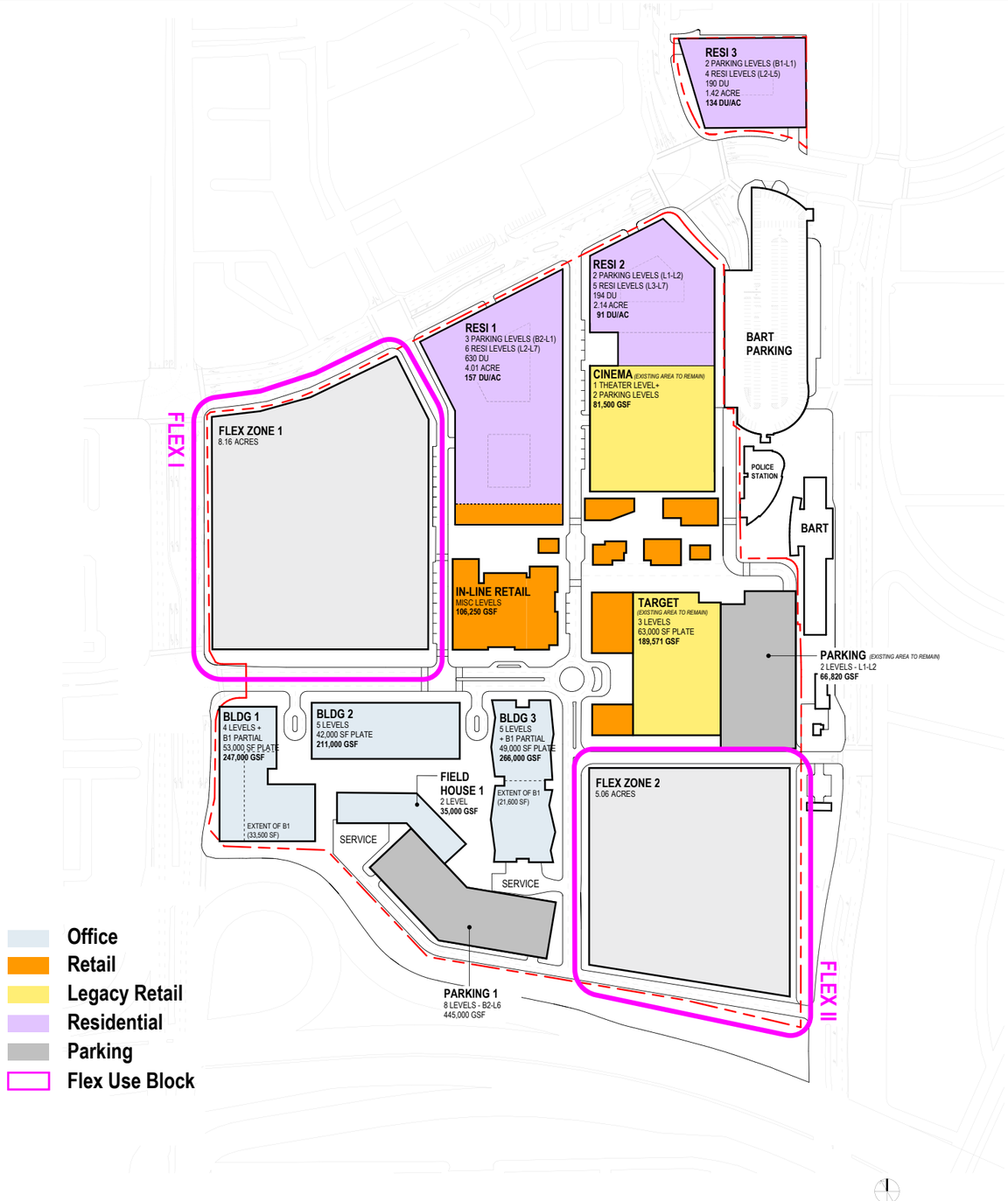
As discussed in Section 2.3.1, *Existing Land Use*, a portion of the project site is designated as Regional Commercial and a portion is designated as Transit-Oriented Development in the City's General Plan. A General Plan Amendment to designate the entire project site to Transit-Oriented Development is proposed as part of the project to ensure consistency between the project and the General Plan. The project would also amend the P-D zoning district on the project site, which was originally adopted in 1966 to allow for the current mall use, and approve a planned development plan to allow for the types of uses proposed by the project, up to the densities studied in this EIR. The zoning amendment and planned development plan would allow multi-family housing densities at a minimum of 75 dwelling units per acre, and a maximum number of 1,514 dwelling units in planning areas that allow residential uses. The proposed combined floor area ratio (FAR) maximum for all uses and planning areas within the P-D zoning district would be 4.5. Other permitted uses would include retail sales; eating and drinking establishments; personal and business services; professional and medical offices; financial, insurance, and real estate offices; hotels and motels; educational and social services; and government offices.

Development on the project site is also subject to the San Francisco International Airport (SFO)'s Airport Land Use Compatibility Plan (ALUCP), a state-mandated land use compatibility plan that addresses the compatibility of surrounding land uses in local jurisdictions with airport operations. The site is thus subject to land use criteria pertaining to safety and noise compatibility, and a referral must be made to the San Francisco Airport Land Use Commission (ALUC) for a determination of the project's consistency with the ALUCP. As further discussed in Section 3.9, *Land Use*, the project site falls within the Airport Influence Areas A and B and the 70 decibel (dB) Community Noise Equivalent Level (CNEL). In addition, most of the project site, with the exception of the southwest corner, falls within safety compatibility zone 4. Large child day care centers,[2] biosafety level (BSL) 3 and 4 facilities,[3] hospitals, nursing homes and children's schools[4] are incompatible with the site's location in safety zone 4 of the ALUCP. These uses would be prohibited in the portion of the project site within safety zone 4 under the proposed P-D zoning district. BSL level 1 and 2 facilities would be permitted throughout the project site, subject to ALUCP requirements regarding building exits. Residential uses are also incompatible with noise levels above 70 dB per the ALUCP. Residential uses would be permitted throughout the project site under the proposed P-D zoning district. Therefore, the San Bruno City Council would need to adopt a Local Agency Override of any ALUC determination precluding residential uses based on specific interior noise levels being met, as described in Section 2.7, *Required Project Approvals*. The environmental impacts of locating residential uses within the 70 dB CNEL zone are evaluated in Section 3.10, *Noise*.

[2] Defined in the ALUCP as "[c]ommercial facilities defined in accordance with Health and Safety Code, Section 1596.70, et seq., and licensed to serve 15 or more children. Family day care homes and noncommercial employer-sponsored facilities ancillary to place of business are allowed."

[3] Defined in the ALUCP as "[m]edical and biological research facilities involving the storage and processing of extremely toxic or infectious agents."

[4] Defined in the ALUCP as "[p]ublic and private schools serving preschool through grade 12, excluding commercial services."



Source: ARE-San Francisco No.96, LLC, 2025

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Figure 2-8
Conceptual Site Plan

A. Residential Conceptual View

B. Retail Village Conceptual View

C. Amenity Pavillion Conceptual View

D. Lab 1 Conceptual View

E. Lab 2 Conceptual View

F. Lab 3 Conceptual View

Source:
AARE-San Francisco No.96, LLC, 2025

Graphics ... City_San_Bruno/104709 (5-8-25).tag

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Figure 2-9
Conceptual Renderings

2.6.1.1 Programmed Area

As shown in Figure 2-8, Conceptual Site Plan, the project includes a programmed area with residential, retail, office/life science, theater, and parking uses. The three parcels located at the northern portion of the project site along Sneath Lane would be dedicated to residential uses and would provide 1,014 residential dwelling units. The central portion of the programmed area would include retail in the center of the project site, along with restaurants, cafes, and a market hall. The cinema abuts the BART parking garage on the east side of the project site along Huntington Avenue. The southwestern portion of the programmed area, located south of Tanforan Way, would include life science/office uses, an amenity pavilion, and a parking structure.

2.6.1.2 Flex Zones

As shown in Figure 2-8, Conceptual Site Plan, the project includes two "flex zones." The northern flex zone, referred to as Flex Zone I, would be located at the southeast corner of the El Camino Real/Sneath Lane intersection, in the northwestern corner of the project site. The southern flex zone, referred to as Flex Zone II, would be located in the southeastern corner of the project site, north of I-380 and west of Huntington Avenue. The flex zones would allow the development of a range of uses that may be constructed in these areas in order to provide flexibility for the multi-year project to respond to changing market conditions and user demand. The flex zones could be developed with a mix of life-science laboratory and office, residential, retail, grocer, amenity, and/or hotel uses. The exact amount and configuration of future development in the flex zones would depend on a number of market factors, and cannot be forecast with precision. However, the project re-zoning would establish design guidelines and maximum allowable uses for both commercial and residential development, and all development would be subject to separate development permits.

2.6.2 Buildout Projections

To ensure a conservative approach in analyzing environmental impacts under CEQA, EIRs typically analyze the most impactful scenario in order to disclose all potential significant impacts that could occur from implementation of a project. For the evaluation of a project with flexible land use areas, it is necessary to project buildout calculations in order to carry through the environmental review analysis. Therefore, for purposes of the EIR analysis, two land use scenarios have been defined: Scenario A (Research and Development [R&D] Scenario) and Scenario B (Residential Scenario). Scenario A assumes the flex zones would be predominantly built out with life science laboratory and office uses, with some amenity uses, while Scenario B assumes that the flex zones would be built out with a mix of residential uses, with some life-science laboratory and office uses, some retail uses, some amenity uses, and hotel uses. The programmed area would remain the same in both scenarios.

These two land use scenarios represent a reasonably foreseeable range of development that would be expected to occur in the flex zones. The intent of defining the land use scenarios is to capture the full range of possible land uses that could be developed on the project site. The land use scenarios are for EIR analysis purposes; the ultimate development within the flex zones will likely be a blend of the two scenarios. For each resource area studied, the EIR evaluates the scenario with the greatest potential to result in a significant impact. For example, the analysis of impacts on schools in Section 3.12, *Public Services* of this Draft EIR evaluates Scenario B (Residential Scenario), as it would generate the most school children. This approach ensures that the EIR identifies the maximum potential impacts of the project.

Table 2-2 and Table 2-3 provide a detailed breakdown of land uses for Scenario A and Scenario B, respectively, in terms of new, net new, and total square footage upon buildout. The term "buildout" refers to the future scenario in which development permitted under the project is fully implemented and buildings occupied.

Table 2-2. Projected Buildout Summary – Scenario A (R&D Scenario)

Land Use	Existing (sf)	Existing to be Removed (sf)	New Construction (sf)	Net New (sf)	Total Buildout (sf)
Retail: In-Line	785,489[a]	785,489	106,250	-679,239	106,250
Retail: Target	189,571	-	-	-	189,571
Retail: Movie Theater	75,800	-	5,700	5,700	81,500
Retail (Total)	1,050,860	785,489	111,950	-673,539	377,321
Residential (Total)	-	-	1,050,000 (1,014 DU)	1,050,000 (1,014 DU)	1,050,000 (1,014 DU)
Office	-	-	724,000	724,000	724,000
Amenity	-	-	35,000	35,000	35,000
Office: Flex Zones	-	-	999,580	999,580	999,580
Amenity: Flex Zones	-	-	34,000	34,000	34,000
Office/R&D (Total)	-	-	1,792,580	1,792,580	1,792,580
Total	**1,050,860**	**785,489**	**2,954,530**	**2,169,041**	**3,219,901**

Notes:
[a] Approximately 65,000 sf of existing retail use is vacant; remaining is occupied.
sf = square feet, DU = dwelling units
Source: ARE-San Francisco No. 96, LLC, 2024.

Table 2-3. Projected Buildout Summary – Scenario B (Residential Scenario)

Land Use	Existing (sf)	Existing to be Removed (sf)	New Construction (sf)	Net New (sf)	Total Buildout (sf)
Retail: In-Line	785,489[a]	785,489	106,250	-679,239	106,250
Retail: Target	189,571	-	-	-	189,571
Retail: Cinema	75,800	-	5,700	5,700	81,500
Retail: Flex Zones	-	-	100,000	100,000	100,000
Retail (Total)	1,050,860	785,489	211,950	-573,539	477,321
Residential	-	-	1,050,000	1,050,000	1,050,000
Residential: Flex Zones	-	-	500,000	500,000	500,000
Residential (Total)	-	-	1,550,000 (1,514 DU)	1,550,000 (1,514 DU)	1,550,000 (1,514 DU)
Office	-	-	724,000	724,000	724,000
Amenity	-	-	35,000	35,000	35,000
Office: Flex Zones	-	-	450,000	450,000	450,000
Amenity: Flex Zones	-	-	20,000	20,000	20,000

Land Use	Existing (sf)	Existing to be Removed (sf)	New Construction (sf)	Net New (sf)	Total Buildout (sf)
Office/R&D (Total)	-	-	1,229,000	1,229,000	1,229,000
Hotel - Flex Zones	-	-	125,000 (170 rooms)	125,000 (170 rooms)	125,000 (170 rooms)
Total	**1,050,860**	**785,489**	**3,115,950**	**2,330,461**	**3,381,321**

Notes:

[a] Approximately 65,000 sf of existing retail use is vacant; remaining is occupied.

sf = square feet, DU = dwelling units

Source: ARE-San Francisco No. 96, LLC 2024.

2.6.3 Proposed Building Heights

Proposed building heights would range from 1 to 7 stories (20 to 79 feet, 7 inches), with varying floor-to-floor heights. Maximum building heights would be within both the City's height limit maximum of 79 feet, 7 inches measured from grade, and the SFO-adopted safety height limits of 125 feet to 145 feet measured from AMSL, as defined from the origin of the North American Vertical Datum of 1988 (NAVD88). A conceptual building height plan is provided in Figure 2-10, Conceptual Building Height Plan.

2.6.4 Landscape and Trees

The project landscape plan would provide a contrast to the surrounding urban landscape, creating places to meet, work, lounge, gather in groups, or find respite from other uses on the site. Hard- and soft-scape elements are expected to include unique textural details, sound mitigating strategies, distinctive pavements, and lush and varied plantings. Proposed landscape, hardscape, and garden areas are shown in Figure 2-11, Conceptual Landscape and Open Space Plan.

A pre-demolition assessment of the trees at the project site determined that 114 tree specimens would be removed as part of the project (Walter Levison, Consulting Arborist 2024). This would include 49 (43% of the study population) Heritage Trees (protected-status trees), three of which are in very poor or dead condition, and 68 (59% of the study population) non-heritage trees, 13 of which are in very poor or dead condition. The City Municipal Code states that Heritage Trees include all trees that have a trunk diameter greater than or equal to 10 inches when measured at 54 inches above natural grade or any native bay tree, buckeye, oak, redwood, or pine tree with a diameter greater than or equal to six inches. Heritage trees proposed to be removed include London plane tree, Lombardy poplar, Italian stone pine, holly oak, coast live oak, Australian brush cherry, silk oak, Monterey pine, and blackwood acacia. In accordance with the City's Municipal Code requirements, new trees would be planted at a minimum 1:1 ratio to offset the trees that are being removed. As previously noted, the project expects to plant approximately 475 trees, all 24-inch box or larger, for a total net increase of 361 trees in the project site.

2.6.5 Design Guidelines

The proposed P-D zoning district would include Building Design Guidelines. New buildings would be required to provide human scale and visual interest at the pedestrian level; be complementary to one another in terms of overall form and massing, fenestration, rooflines, and other major architectural elements; and exhibit strong three-dimensional façades. Primary entrances would be prominent and scaled to the street and/or open spaces they face. Blank, windowless walls would be prohibited along entire street frontages. Interior and exterior lighting would be designed to direct and/or shield light fixtures to prevent night sky light pollution, glare, and light spillage onto adjacent buildings and properties. In addition, as described in Section 3.2, *Biological Resources*, the design of buildings must utilize approaches to minimize the risk of bird strikes. Required approaches would include minimizing glazing; using low-reflective glass and/or patterned or fritted glass; and the use of window treatments to break up large reflective surfaces. The Building Design Guidelines provide additional direction regarding architectural design and materials.

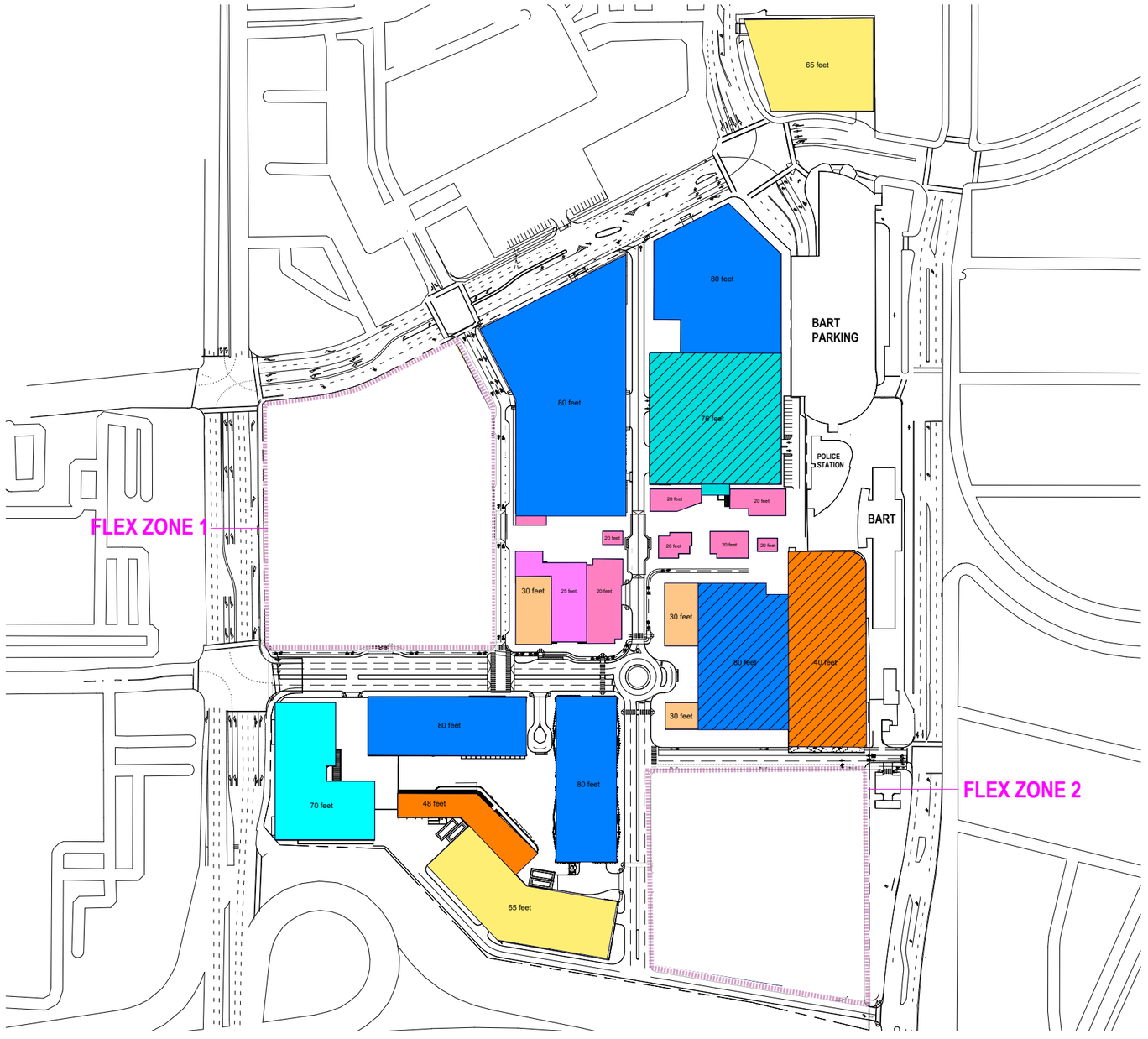
2.6.6 Public Realm Improvements

The project would implement public realm improvements which would benefit the San Bruno community widely, as well as the residents and workers in the residential and commercial components of the project. The public realm improvements include displays of public art in privately owned, publicly accessible common areas including medians, pathways, landscaped areas, outdoor gathering spaces and plazas. Other improvements would enhance bike and pedestrian safety, such as the installation of bike racks and fixed and removable bollards. Site furniture would also include built-in seating elements, picnic tables and benches, a fireplace area, and moveable outdoor furniture. The commercial plaza areas of the proposed retail village would be designated as publicly accessible. Under Scenario A, the project would include 98,500 sf of publicly accessible open space and 257,000 square feet of privately accessible open space, for a total of 356,000 sf (8.2 acres) of open space. Under Scenario B, the project would include 99,000 sf of publicly accessible open space and 251,000 sf of privately accessible open space, for a total of 350,000 sf (8 acres) of open space. The project would result in an estimated 0.8 acre (approximately 30 percent) increase in pervious surface, for both Scenario A and Scenario B on the project site. However, Scenario B would result in approximately 1,000 square feet more impervious cover than Scenario A.

2.6.7 Lighting, Signage, and Site Security

2.6.7.1 Lighting

Lighting for the project would enhance the safety and security of residents, employees, and customers by incorporating the principles of Crime Prevention Through Environmental Design (CPTED). CPTED principles would guide the design of the project in a manner that increases the responsible, positive use of property while decreasing the likelihood of criminal behavior. The project would provide appropriate levels of lighting and motion activated elements to support security while taking into consideration potential glare or impacts on scenic vistas. All lighting would comply with Title 24, CalGreen outdoor lighting requirements for non-residential occupancies, and all Dark Sky Initiatives applicable to San Bruno. Additionally, offsite roadway lighting would comply with San Bruno lighting standards for fixture selection and illumination requirements.



SB Planning Building Heights

- Existing Building
- 20 feet
- 25 feet
- 30 feet
- 35-50 feet
- 60 feet
- 65 feet
- 70 feet
- 76 feet
- 80 feet*

* The San Bruno regulations result in a 79'-7" building height limit measured from grade and these buildings will comply with this restriction.

Source: ARE-San Francisco No.96, LLC, 2025

Graphics ... City_San_Bruno\104709\(5-13-25).tag

Figure 2-10
Conceptual Building Height Plan

PUBLICLY ACCESSIBLE OPEN SPACE

PRIVATE TENANT/ RESIDENTIAL OPEN SPACE

Source: ARE-San Francisco No.96, LLC, 2025

fieldoperations ALEXANDRIA. Gensler

ICF

Figure 2-11
Conceptual Landscape and Open Space Plan

Graphics ... City_San_Bruno\104709\(6-24-25).tag

2.6.7.2 Signage

Signage would serve as a means of identification and wayfinding and would follow established regulations and procedures detailed in the San Bruno Municipal Code, the proposed Building Design Guidelines, the California Building Code, and the International Building Code. The design of project signage would be guided by consideration for all abilities and needs.

2.6.7.3 Site Security

Security at the project site is provided by the San Bruno Police Department (SBPD) which provides services within four geographically balanced "beats" within the city. The project site is within Beat One. The project design will be reviewed by the SBPD to ensure best design practices for Crime Prevention Through Environmental Design (CPTED), such as maintaining site lines, ensuring adequate access and egress for emergency vehicles, and the installation of security cameras. The construction and staging footprints will likewise be reviewed by SBPD during development and design to ensure emergency vehicle access and unobstructed ingress and egress to the Police Station at 1177 Huntington Avenue.

A sitewide security plan for the project site would be prepared by a professional consultant and reviewed and approved by the SBPD. Each life science property is expected to have its own security plan which will be subject to review and approval by the SBPD, with regular and ongoing coordination with the sitewide management team. Security plans may be required during the construction phase, subject to the determination of the Chief of Police.

Due to the nature of R&D uses, the possibility exists for hazards related to the handling of hazardous materials, including biomedical materials and waste, to occur. Laboratories associated with R&D uses are categorized as biosafety levels (BSLs) 1 through 4. It is anticipated that the project could accommodate BSL-1, BSL-2, and/or BSL-3 laboratories. BSL-4 laboratories, which are much less common (with only four operational BSL-4 labs existing in the United States)[5], would not be permitted under the proposed P-D zoning. As discussed in Section 2.6.1, *Project Summary*, BSL-3 laboratories would only be allowed within the small area in the southwestern portion of the project site that is outside SFO's Safety Zone 4, as BSL 3 and 4 facilities are incompatible uses in Safety Zone 4. Refer to Section 3.7, *Hazards and Hazardous Materials*, for a map and further discussion of the project in relation to SFO safety zones.

2.6.8 Transportation, Circulation, and Access

The project would include a revised internal roadway configuration along with amenities to enhance vehicular, emergency vehicle, pedestrian, and bicycle access in and to the project site. These improvements are detailed below. A conceptual vehicular circulation plan is provided in Figure 2-12, Conceptual Vehicle Circulation Plan. A conceptual bicycle and pedestrian circulation plan is provided in Figure 2-13, Conceptual Bicycle and Pedestrian Circulation Plan.

[5] National Institute of Allergy and Infectious Diseases. 2018. *The Need for Biosafety Labs*. Available: https://www.niaid.nih.gov/research/biosafety-labs-needed. Accessed: March 7, 2025.

2.6.8.1 Vehicular Circulation and Access

The project would have access and egress points on El Camino Real, Sneath Lane, and Huntington. On El Camino Real, Tanforan Way would be the only driveway into and out of the project site; this would likely be the busiest gateway for vehicle traffic. On Sneath Lane, the project would maintain access via Seabiscuit Avenue, B Street, and D Street, which align with the current driveways into the mall and BART garage today. On Huntington Avenue, the project would maintain two driveways – removing the southern entrance/exit from the mall parking garage – as C Street and E Street.[6] The pull through design for BART pick-up/drop-off and transit would remain unchanged. All access and egress streets would be designed to accommodate waste management collectors, service vehicles, and delivery trucks.

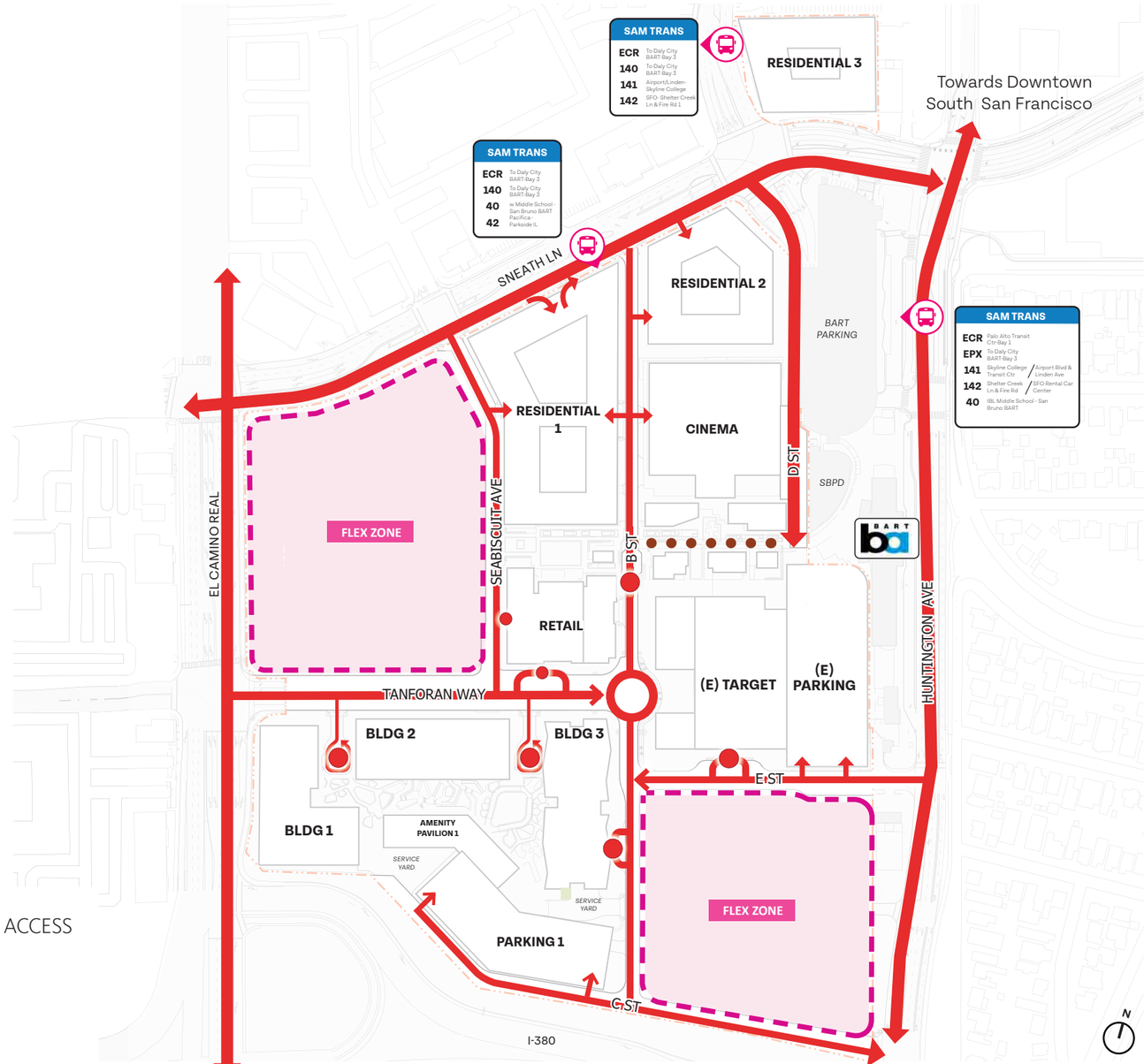
B Street would run the full length of the project site north to south and would intersect with Tanforan Way at a central roundabout. Seabiscuit Avenue would intersect Tanforan Way and would serve Flex Zone I, Residential 1, and the retail plaza. B Streets would serve all blocks of the site except Flex Zone I and is anticipated to serve many more vehicle trips than it does today given all the connection points throughout the site. D Street would primarily serve BART and the San Bruno Police Department. E Street would serve Target and Flex Zone II. C Street would serve Flex Zone II and the office amenity pavilion and parking.

The project includes a handful of changes to the gateway intersections and the surrounding circulation network, all aimed at improving multimodal access and safety. On El Camino Real, the project would adjust lane geometries and signal timing to better serve the increased peak period demand entering/exiting Tanforan Way. This could include adding a second westbound left turn lane from the project onto southbound El Camino Real and second dedicated northbound right turn lane from northbound El Camino Real into the project site. On Sneath Lane, the project may reduce excess vehicle lane capacity to make space for a protected two-way cycle track along the project frontage. One vehicle through or turn lane would be dropped west of B Street to free up adequate space for the bicycle facility. B Street and Sneath Lane would also be signalized to accommodate increased demand and safely manage the conflicting bicycle, pedestrian, and vehicle movements, all of which are expected to become more frequent with this multimodal, transit-oriented project. To support B Street being signalized, the City may require the offset driveway across the street to be made right-in, right-out. At Huntington Avenue and Maple Avenue, the project would adjust lane geometries and signal timing to better serve the increased peak period demand. No other vehicle network changes are proposed on Huntington Avenue.

2.6.8.2 Pedestrian and Bicycle Circulation and Access

The project would break up the project site with pedestrian-scale streets and blocks. All internal streets, except D Street, would have pedestrian sidewalk, crosswalk, and lighting improvements and create environments that encourage walking. On El Camino Real, the project may add a crosswalk to the southern leg of El Camino Real, serving as a gateway to a pedestrian pathway running through the project site. The project would install leading pedestrian intervals with all signals at project entry and exit points. At crossings that have longer crossing distances, the project would add pedestrian refuge islands.

[6] Note that street names included in the DEIR are placeholders and will be finalized in the Subdivision Map subject to all city standards and processes.

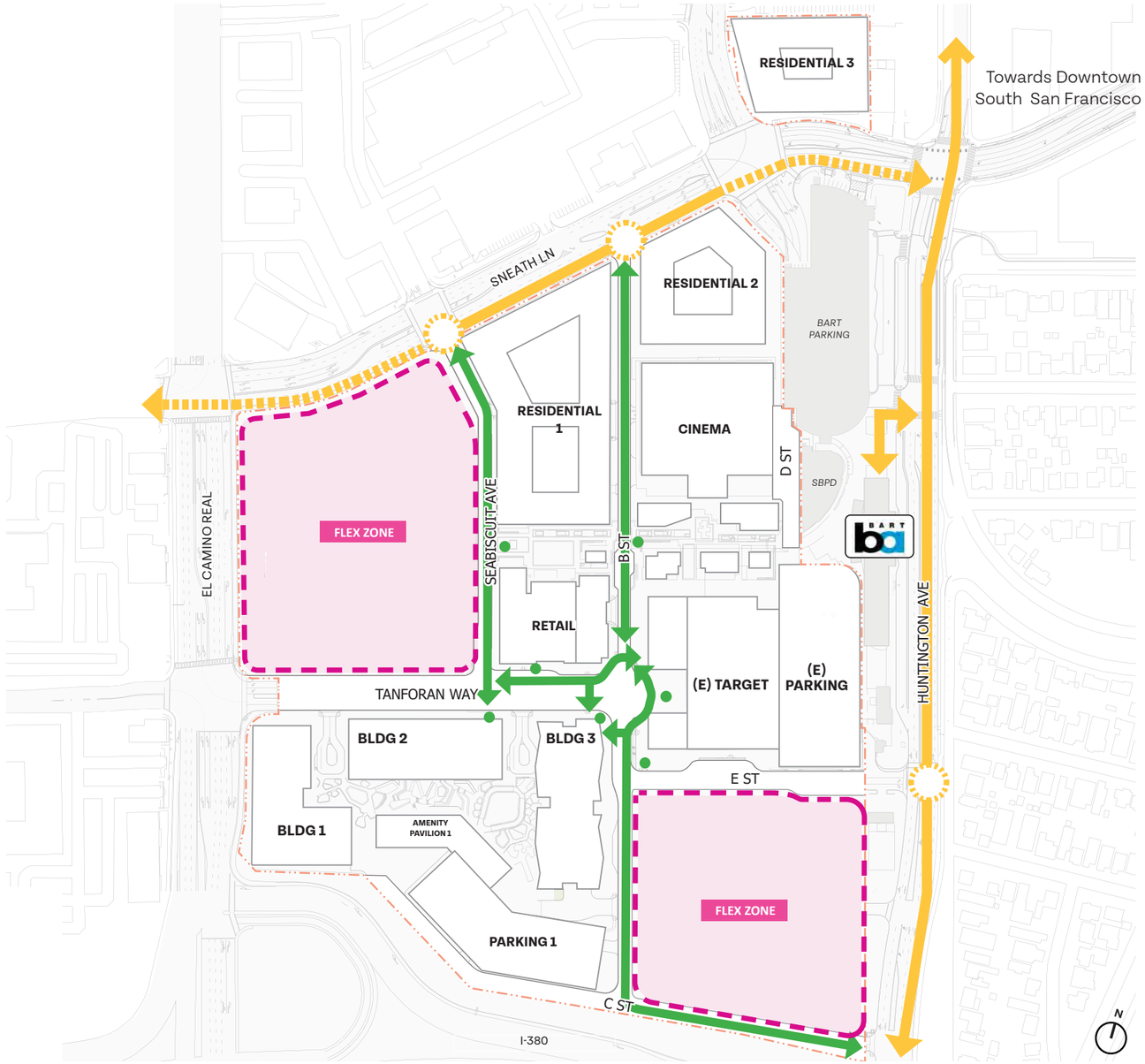


* Internal street names to be finalized at a later date

Source: ARE-San Francisco No.96, LLC, 2025

Graphics ... City_San_Bruno\104709 (5-13-25).jpg

Figure 2-12
Conceptual Vehicle Circulation Plan



EXISTING, EXTERNAL
PROPOSED, EXTERNAL
KEY INTERSECTIONS, EXTERNAL
PROPOSED, INTERNAL
DISMOUNTING ZONES

* Internal street names to be finalized at a later date

To Downtown
San Bruno

Source: ARE-San Francisco No.96, LLC, 2025

Graphics ... City_San_Bruno\104709\(5-13-25).tag

Figure 2-13
Conceptual Bicycle and Pedestrian Circulation Plan

The project would make substantial improvements to the bicycle circulation network within the project site and would contribute to low-stress options for getting to and from the site from the surrounding network. The project includes bicycle facilities on Seabiscuit, B Street, and C Street, including connections through the roundabout and along a stretch of Tanforan Way. These facilities would connect to the external network through key improvements at the gateway intersections and along Sneath Lane, which would serve as the only complete east-west bicycle travel option north of I-380.

On El Camino Real, the project would add bicycle markings connecting Commodore Drive and Tanforan Way. On Sneath Lane, the project would replace the one-block Class II bicycle lane with a more appropriate bicycle facility for the number of lanes and vehicle volumes on Sneath Lane, accounting for completion of the project. The current design provided in the City's Walk 'n Bike Plan includes a two-way cycle track on the south side of Sneath Lane for the full length of Sneath between El Camino Real and Huntington Avenue. On Huntington Avenue, the project would connect to the city's planned two-way cycle track on the east side of the street by constructing a protected intersection at either E Street or C Street, depending on the final project design. No changes are expected to transit facilities or routes as a result of the project. That said, the project would improve the site and surrounding network for all pedestrians, including BART and SamTrans transit riders.

2.6.9 Parking

2.6.9.1 Vehicle Parking

The project would provide parking within two large structures located at the south of the project site, as well as within the big box retail structure, the cinema, and the three residential buildings. Both scenarios would retain the parking structures serving the existing cinema and Target, which provide approximately 1,293 spaces, including 743 spaces serving the cinema and 550 spaces serving Target. Under Scenario A (R&D Scenario), approximately 6,221 parking stalls would be provided, including 3,600 stalls to serve the life science/office uses, 1,060 stalls to serve the residential uses, and 1,561 stalls to serve the retail uses (including the 1,293 existing retail spaces). Under Scenario B (Residential Scenario), approximately 5,864 parking stalls would be provided, including 2,662 stalls to serve the life science/office uses, 1,596 stalls to serve the residential uses, and 1,606 stalls to serve the retail/hotel uses (including the 1,293 existing retail spaces). Under both scenarios, 96 stalls would be Americans with Disabilities Act (ADA) accessible parking spaces. The project would adhere to CalGreen Tier 2 electric vehicle (EV) charging requirements for new nonresidential and residential development.[7] For nonresidential uses, CALGreen Tier 2 requires 45 percent of the total parking spaces to be EV Capable and 33% of EV Capable spaces to be EV charging stations (EVCS). For multifamily residential uses and hotels and motels, CALGreen Tier 2 requires 40 percent of the total parking spaces to be EV Ready and 15 percent of the total spaces to be equipped with Level 2 EV supply equipment (EVSE).

[7] Under the proposed P-D zoning, CalGreen Tier 2 EV parking requirements would govern over the City's EV parking requirements set forth in Section 4.106.4.2.2 of the San Bruno Municipal Code.

2.6.9.2 Bicycle Parking

The project would include publicly-accessible bicycle racks in dismounting zones located internally along Tanforan Way, D Street, and Seabiscuit Avenue. City development standards (Municipal Code Section 12.100.050) require one long-term (Class I) bike parking stall for each of the following: every 10,000 square feet of office/R&D use, every 12,000 square feet of retail use, and every 4 residential dwelling units. One short-term (Class II) bike parking stall is required for each of the following: every 20,000 square feet of office/R&D use, every 5,000 square feet of retail use, and every 15 residential dwelling units. The project would include up to 697 bicycle stalls under Scenario A (R&D Scenario), including 464 long-term Class I stalls and 233 short-term Class II stalls. Up to 799 bicycle stalls would be provided under Scenario B (Residential Scenario), including 542 long-term Class I stalls and 257 short-term Class II stalls.

2.6.10 Employment and Residential Population

As shown in Table 2-4, based on the study performed by Economic & Planning Systems (EPS 2025), Scenario A would result in 2,478 net new employees and 2,028 residents living in the 1,014 units at the project site. Scenario B would result in 1,574 net new employees and 3,028 residents living in the 1,514 units at the project site.

Table 2-4. Proposed Project Employee and Resident Generation

Dwelling Units (DU)	Employees	Residents
Scenario A (R&D Scenario) – Estimated Employment and Housing		
1,014	2,478	2,690
Scenario B (Residential Scenario) – Estimated Employment and Housing		
1,514	1,574	3,448

Source: Economic & Planning Systems, Tanforan Mall Redevelopment Fiscal Impact Analysis in press.

2.6.11 Environmental Sustainability Features

The design of the project is expected to incorporate environmentally sustainable design features using the latest feasible strategies while enhancing environmental conditions throughout the site. Exterior environmental elements proposed are increased trees and plantings to support the local environment, and the incorporation of on-site renewables (PV systems) on parking garages and other large roof surfaces. Other exterior design sustainability measures are elements that would create shade and wind protection. Increased energy efficiency measures would exceed California energy efficiency standards (Title 24, Part VI of the California Energy Code). The project targets a 40 percent reduction in indoor water use through the installation of efficient-flow and flush building fixtures, smart metering, leak detection systems and water re-use for low-maintenance, drought tolerant landscaping, and implementation of other water efficiency strategies throughout the site. Interior building sustainability features include all-electric buildings that consist of lighting and the heating, ventilation, and air conditioning (HVAC) systems, and other mechanical systems designed around maximizing energy efficiency using heat recovery systems, efficient building systems with variable exhaust or wind responsive exhaust, reductions in lighting power density, air change setbacks, and high-performance envelopes. With the incorporation of these environmentally sustainable features, the project would meet the United States Green Building Council's Leadership in Energy and Environmental Design (LEED) LEED Gold certification standards for life science

buildings. As noted above, the project would adhere to CalGreen Tier 2 electric vehicle (EV) charging requirements for new nonresidential and residential development. The project would also adopt waste minimization programs including recycling, composting, and reusable product use programs.

2.6.12 Transportation Demand Management

The City/County Association of Governments of San Mateo County (C/CAG) is authorized by California Government Code Section 65088 to prepare a Congestion Management Program (CMP) on a biennial basis. The goal of the CMP is to manage traffic congestion on the designated CMP Network within San Mateo County. The project is located within this network; therefore, C/CAG requires implementation of a Transportation Demand Management (TDM) program. Based on a project's proposed average daily traffic (ADT), the project would be required to implement a TDM program that includes a number of measures to build upon the proposed infrastructure and on-site facilities and reduce single-occupancy vehicle trips. The specific measures are still preliminary, but are anticipated to include:

- **Direct Access to Transit –** the project would provide direct access to the San Bruno BART station and SamTrans Transit Center, enabling convenient use of BART and bus service.
- **Design Streets to Encourage Bicycle/Pedestrian Access –** the project would design internal streets and roadways to facilitate multimodal travel.
- **Pedestrian Oriented Uses and Amenities on Ground Floor –** the project would provide on-site, visible amenities to tenants and guests.
- **Secure Bicycle Storage –** the project would provide secure bicycle storage and showers, lockers, and changing rooms for cyclists.
- **TDM Coordinator/Contact Person –** the project would provide a TDM coordinator/liaison for residential and commercial tenants.
- **Participate in Commute.org or Transportation Management Association (TMA) –** the project would obtain certification of registration from Commute.org or an equivalent TMA.
- **Carpool or Vanpool Program –** the project would establish a carpool/vanpool program for residential and commercial tenants.

2.6.13 Infrastructure Improvements

The project would utilize the existing public utility network to the extent feasible and would require demolition and re-routing of some existing utilities and the construction of new utility infrastructure to serve the project's demand for water, wastewater, storm drain, and dry utility services. Infrastructure and utilities would be designed to meet the standards of the City and other utility agencies with oversight authority. It is anticipated that the following infrastructure improvements would be required to serve the project. The proposed utility improvements are described below and shown in Figures 3.16-4 through Figure 3.16-6 in Section 3.16, *Utilities and Service Systems*.

2.6.13.1 Water

The project includes installation of a network of 12-inch diameter water mains on the project site. Existing 12-inch diameter pipelines along Sneath Lane and Huntington Avenue would not require upsizing and would supply the new water mains for the project.

2.6.13.2 Wastewater

The project would include construction of an on-site sewer system to serve the new buildings. The main on-site lines would generally run south to north and connect to the existing City trunk sewer in Sneath Lane at two locations intermediate between El Camino Real and Huntington Avenue. The project would abandon the existing 24-inch trunk sewer through the project site and route a new sewer west along the southern boundary of the site, starting at its upstream connection point (assumed to be at City manhole 895), and then north along El Camino Real to Sneath Lane. The existing trunk sewer in Sneath Lane from El Camino Real to Seabiscuit Avenue (City manhole 1349) would also be replaced as part of the project. The project proposes to install a 30-inch high-density polyethylene (HDPE) pipe to replace the existing trunk sewer lines.

2.6.13.3 Stormwater

The project proposes to install a network of storm drain pipelines throughout the project site. An 18-inch storm drain is proposed on the southern boundary and through the center of the project site and would convey runoff via 24-inch storm drains to existing storm drains north and east of the project site.

The proposed project includes the addition of landscape areas and bioretention planters throughout the development to manage stormwater. Site stormwater design measures would direct runoff onto vegetated areas and roof runoff would be directed into cisterns or rain barrels and use rainwater for irrigation or other non-potable use. Proposed conditions would resize the area of existing drainage basin areas within the project site to redistribute runoff conveyed to the City's storm drain system. The proposed onsite storm drain system would have connections to the San Bruno storm drain system.

2.6.13.4 Electricity, Natural Gas, and Telecommunications

The utility providers for the project site would be Peninsula Clean Energy (PCE) and Pacific Gas & Electric (PG&E) for electricity and Comcast[8] and AT&T for telecommunications service. No use of natural gas is anticipated for the project as buildings would be all electric. The project would install new connections to the surrounding PG&E electric grid to provide service to future buildings throughout the project site. The project would also install new connections to the surrounding communication lines along adjacent roadways. The project does not propose major upgrades to electricity and telecommunications infrastructure serving the project site.

2.6.14 Off-Site Improvements

The proposed circulation and utility improvements are described in Section 2.6.8, *Transportation, Circulation, and Access*, and Section 2.6.13, *Infrastructure Improvements*, above. Of those improvements, the following could occur in public right-of-ways adjacent to and outside the project site boundary:

[8] The City of San Bruno has entered into agreement with Comcast to acquire all existing CityNet Services.

- Lane reconfiguration, signal upgrades, crosswalk, and bicycle markings at El Camino Real and Tanforan Way;
- Lane reconfiguration and signal upgrades at El Camino Real and Sneath Lane;
- Two-way cycle track on the south side of Sneath Lane between El Camino Real and Huntington Avenue;
- Lane reconfiguration and pedestrian islands at Sneath Lane and Seabiscuit Avenue;
- New signal at Sneath Lane and B Street;
- Lane reconfiguration and pedestrian islands at Sneath Lane and Huntington Avenue/BART;
- Lane reconfiguration and signal upgrades at Huntington Avenue and Maple Avenue;
- Pedestrian islands at Huntington Avenue and E Street; and
- Install new 30-inch trunk sewer along El Camino Real and Sneath Lane.

2.6.15 Emergency Generators

It is anticipated that Scenario A would include the installation of approximately 19 emergency generators, ranging in capacity from 250 kilowatts (kW) to 2,250 kW. Under Scenario B, the project would be anticipated to include the installation of 17 emergency generators, also ranging in capacity from 250 kW to 2,250 kW. All generators would be located in outdoor service yards throughout the project site under both scenarios.

2.6.16 Project Construction and Phasing

Both project scenarios would be constructed in six main stages with initial project activities like demolition, grading, site preparation, and utility work occurring in the Make Ready phase and building construction activities, including basement excavation, occurring in the following phases, as described below.

2.6.16.1 Demolition

For both Scenario A and Scenario B, demolition of the existing mall and pedestrian bridge connecting the movie theater to the mall would occur in the first phase (Make Ready). The approximately 75,800 sf movie theater and 189,571 sf Target building, along with their associated parking garages, would remain on the project site and would not be demolished (APN 014-316-310 and APN 014-316-080, respectively). In total, approximately 785,489 sf of the existing building space (Tanforan mall) would be removed.

The anticipated haul route for both demolition waste and soil hauling includes traveling to the project site via I-380, exiting at El Camino Real, traveling northbound on El Camino real, turning right on Sneath Lane, and right again on Huntington Avenue, and entering the site near the southeast corner of the project site. To depart the project site, heavy trucks would use this route in reverse.

2.6.16.2 Grading, Excavation, and Dewatering

The project under both Scenario A and Scenario B would require major grading and excavation for the subterranean garages and basements. Both scenarios would require a total area of disturbance of approximately of 40 acres. Target, the Century movie theater, and the existing parking garages associated with those uses are not expected to be disturbed, with the exception of Target's southern parking garage, which will be removed. Scenario A would excavate approximately 886,000 cubic yards of soil, exporting approximately 597,000 cubic yards off the project site. Scenario B would excavate approximately 926,300 cubic yards of soil, exporting approximately 587,000 cubic yards off the project site. The maximum depth of excavation would be approximately 45 feet below grade under Scenario B and 40 feet below grade under Scenario A. All garages and basements would be waterproofed and would not require permanent dewatering systems. However, construction dewatering is anticipated to be needed in Phases 1, 3, and 4 of project construction under both scenarios (phasing is further described below).

2.6.16.3 Construction Activities and Schedule

For both Scenario A and Scenario B, the Make Ready phase is estimated to take approximately 1.3 years, and subject to market conditions could be completed as soon as 2027. Subject to market conditions, Phases 1, 2, and 3 could be completed in 2027, 2028, and 2029, respectively. For Scenario A, completion of Phase 4 Flex 2, which would be full build-out, could occur approximately 6 years after the end of Make Ready, by the fall of 2033. For Scenario B, completion of Phase 4 Flex 2 could occur by the end of 2033, also approximately 6 years from completion of the Make Ready phase.

Construction activities would include up to 100 individual instances of nighttime construction for concrete pour activities over the approximately 6-year construction period. Concrete pours often must occur during nighttime hours because cooler temperatures and higher humidity levels provide better conditions for concrete curing. Of the 100 individual instances of nighttime concrete pours, approximately 14 such events are expected to occur within 500 feet of existing residents.

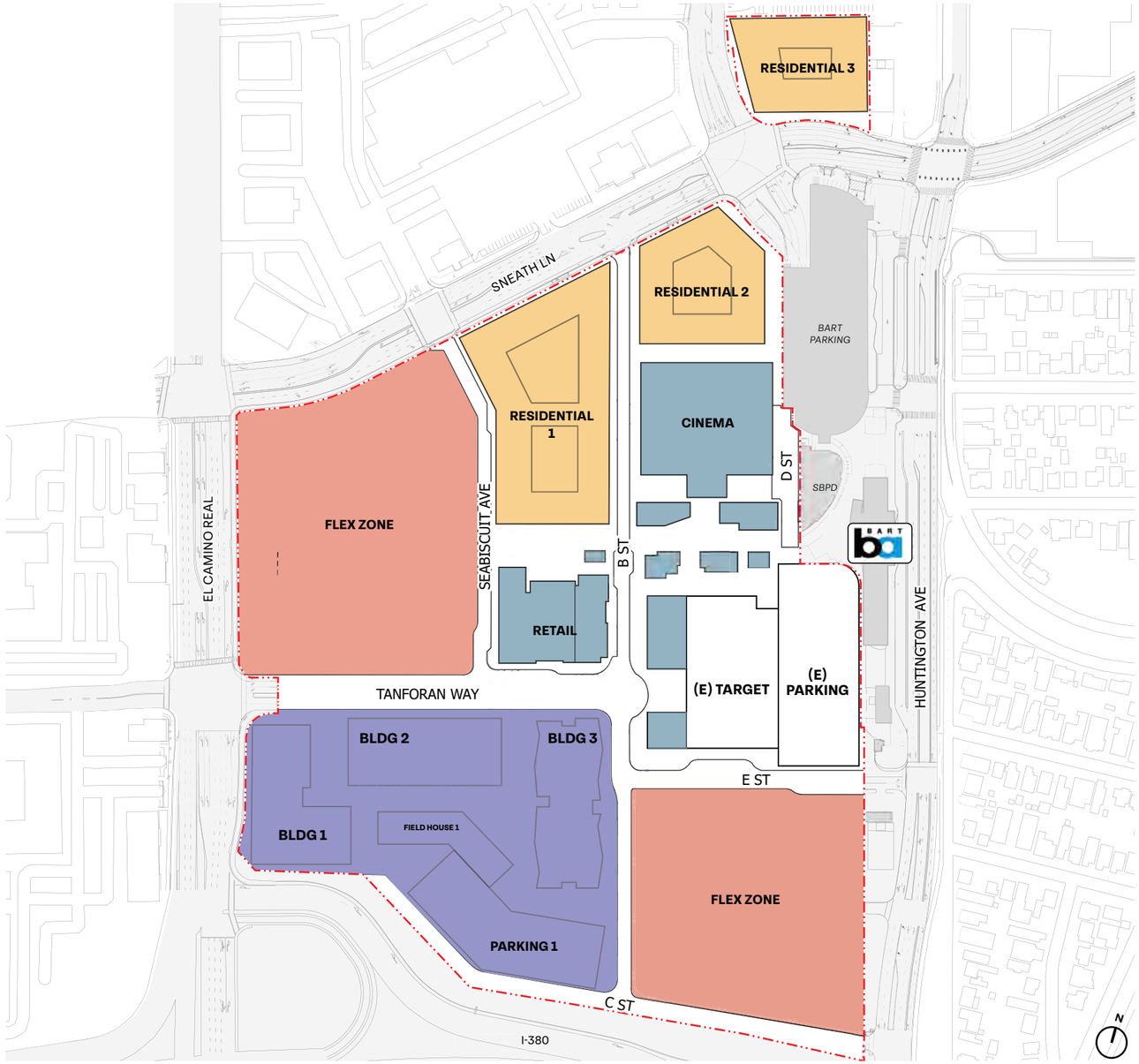
A construction phasing diagram is shown in Figure 2-14, Construction Phasing. The following schedule assumptions show construction activities and anticipated timelines for each scenario, with a potential for activities to overlap:

- **Scenario A**
    - **Make Ready** would take approximately 1.3 years.
        - Demolition of the movie theater bridge and improvements to movie theater entrance (approximately 8 months)
        - Relocation/termination of existing utilities and demolition of the existing mall (approximately 7 months)
        - Demolition of parking lots, grading, on-site utilities, and paving of new roads (approximately 8 months)

- **Phase 1** would take approximately 2.8 years.
  - Basement shoring, excavation, and construction of residential building 1 (approximately 32 months)
  - Construction of residential building 2 (approximately 22 months)
  - Basement shoring, excavation, and construction of residential building 3 (approximately 24 months)
- **Phase 2** would take approximately 1.6 years.
  - Construction of the retail area (approximately 20 months)
- **Phase 3** would take approximately 2.5 years.
  - Basement shoring, excavation, and construction of parking structure 1 (approximately 23 months)
  - Basement shoring, excavation, and construction of life-science/office building 1 (approximately 22 months)
  - Construction of life-science/office building 2 (approximately 20 months)
  - Basement shoring, excavation, and construction of life-science/office building 3 (approximately 23 months)
  - Construction of field house 1 (approximately 8 months)
- **Phase 4 Flex 1** would take approximately 2.7 years, including basement shoring, excavation, and construction of structures.
- **Phase 4 Flex 2** would take approximately 2.4 years, including basement shoring, excavation, and construction of structures.

- **Scenario B**
  - **Make Ready** would take approximately 1.3 years.
    - Demolition of the movie theater bridge and improvements to movie theater entrance (approximately 8 months)
    - Relocation/termination of existing utilities and demolition of the existing mall (approximately 7 months)
    - Demolition of parking lots, grading, on-site utilities, and paving of new roads (approximately 8 months)
  - **Phase 1** would take approximately 2.8 years.
    - Basement shoring, excavation, and construction of residential building 1 (approximately 32 months)
    - Construction of residential building 2 (approximately 22 months)
    - Basement shoring, excavation, and construction of residential building 3 (approximately 24 months)

- **Phase 2** would take approximately 1.6 years.
  - Construction of the retail area (approximately 20 months)
- **Phase 3** would take approximately 2.5 years.
  - Basement shoring, excavation, and construction of parking structure 1 (approximately 23 months)
  - Basement shoring, excavation, and construction of life-science/office building 1 (approximately 22 months)
  - Construction of life-science/office building 2 (approximately 20 months)
  - Basement shoring, excavation, and construction of life-science/office building 3 (approximately 23 months)
  - Construction of field house 1 (approximately 8 months)
- **Phase 4 Flex 1** would take approximately 2.8 years, including basement shoring, excavation, and construction of structures.
- **Phase 4 Flex 2** would take approximately 2.6 years, including basement shoring, excavation, and construction of structures.



Source: ARE-San Francisco No.96, LLC, 2025

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Figure 2-14
Construction Phasing

2.7 Required Project Approvals

The City anticipates the project would require the following entitlements and approvals:

- General Plan Amendment
- Planned Development Zoning and Development Plan
- Design Standards and Guidelines
- Planned Development Permits (including architectural review)
- Vesting Tentative Subdivision Map
- Development Agreement
- Override of Airport Land Use Commission Inconsistency Determination for Residential Uses
- EIR Certification and adoption of CEQA Findings and Statement of Overriding Considerations

2.8 Other Potential Approvals

- California Department of Transportation (Caltrans) for any actions or permits deemed necessary to implement any off-site improvements affecting its facilities
- California Regional Water Quality Control Board
    - Clean Water Act Section 402 National Pollutant Discharge Elimination System General Construction Stormwater Permit and Stormwater Pollution Prevention Plan
- Bay Area Air Quality Management District
    - Stationary-source permits (Authority to Construct and Permit to Operate) for any generators or similar equipment
- Bay Area Rapid Transit (BART) for any actions or permits deemed necessary to implement any off-site improvements affecting its facilities
- City/County Association of Governments Airport Land Use Commission
    - Determination of consistency or inconsistency with the Airport Land Use Compatibility Plan (ALUCP) for the Environs of San Francisco International Airport
- Federal Aviation Administration
    - Notice of Proposed Construction and Alteration and FAA Determination per Code of Federal Regulations Title 14, Part 77.9

2.9 References

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Walter Levison, Consulting Arborist. 2024. Letter of Transmittal / Tanforan Mall Tree Survey. February 15, 2024.

Chapter 3
Environmental Impact Analysis

3.0 Introduction

This chapter analyzes the potential impacts that the project could have on existing environmental conditions. The environmental analysis has been prepared in accordance with the California Environmental Quality Act (CEQA), as amended (Public Resources Code Section [PRC] 21000, et seq.), and the CEQA Guidelines.

3.0.1 Organization of This Chapter

Each chapter covers a CEQA resource area topic and has the following subsections.

- **Regulatory Setting.** The regulatory setting describes the federal, state, and local regulations regarding the impact topic that could be applicable to the construction and operation of the project.
- **Environmental Setting.** The environmental setting describes existing baseline conditions, including the environmental context and background, to the extent needed to understand the environmental impacts of the project.
- **Environmental Impact Analysis.** The environmental impact analysis identifies thresholds of significance and methods for analysis, and evaluates how the project would affect the baseline conditions. If the change to the baseline conditions would exceed the significance thresholds, this normally would constitute a significant impact, in which case mitigation measures to reduce, eliminate, or avoid the significant impacts are recommended.

3.0.2 California Environmental Quality Act Methodology

CEQA Guidelines Section 15151 provides guidance for the preparation of an adequate Environmental Impact Report (EIR).

- An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information that enables them to make a decision that intelligently takes into account the environmental consequences of a project.
- An evaluation of the environmental impacts of a project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible.
- Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. (The courts have looked not for perfection but for adequacy, completeness, and a good-faith effort at full disclosure.)

In practice, this guidance suggests that EIR preparers should adopt a reasonable methodology upon which to estimate impacts and make reasonable assumptions, using the best information reasonably available.

3.0.3 Type of California Environmental Quality Act Analysis

Pursuant to CEQA Guidelines Section 15161, this is a project-level EIR. It serves to provide environmental clearance for the project and support all necessary approvals and entitlements. For purposes of the EIR analysis, as described further below and in Chapter 2, *Project Description*, the project includes a programmed area and two "flex zones." The flex zones would allow the development of a range of uses that may be constructed in these areas to provide flexibility for the multiyear project to respond to changing market conditions and user demand. The flex zones could be developed with a mix of life-science laboratory and office, residential, retail, and/or hotel uses. The exact amount and configuration of future development in the flex zones would depend on various market factors and cannot be forecast with precision. However, the project entitlements would establish maximum allowable uses for both commercial and residential development scenarios. The EIR's approach to evaluating the potential environmental effects that could occur from development within the flex zones is described below.

3.0.3.1 Buildout Scenarios

CEQA Guidelines Section 15126.2 requires that an EIR focus on the significant "direct and indirect" and "short-term and long-term" effects of a project. To ensure a reasonably conservative approach in analyzing environmental impacts under CEQA, EIRs typically analyze what could be considered a reasonably foreseeable worst-case scenario with respect to potential physical impacts on the environment to disclose all potential significant impacts that could occur with implementation of a project.

The term *buildout* refers to a future scenario in which development permitted under project is fully implemented. Buildout of the project would depend on various factors, including market conditions, the availability of financing, and tenancy requirements. As described in Chapter 2, *Project Description*, for purposes of the EIR analysis, two land use scenarios have been defined: Scenario A and Scenario B. Scenario A (Research and Development [R&D] Scenario) assumes the flex zones would be predominantly built out with life-science laboratory and office uses, with some amenity uses. Scenario B (Residential Scenario) assumes that the flex zones would be built out with a mix of residential uses, with some life-science laboratory and office uses, some retail uses, some amenity uses, and a hotel use. The programmed area would remain the same in both scenarios. Refer to Section Chapter 2, Section 2.6.2, *Buildout Projections*, of this EIR for land use breakdowns and conceptual site plans for Scenario A and Scenario B.

For each resource area studied, the EIR evaluates the scenario with the greatest potential to result in a significant impact. This sometimes varies for each specific impact evaluated under the resource topic. In some cases, impacts would be the same regardless of the buildout scenario, so the analysis does not evaluate a specific buildout scenario. This approach ensures that the EIR identifies the maximum potential impacts of the project based on reasonably foreseeable development outcomes. The *Buildout Scenario Evaluated* subsection in each resource section of this chapter includes a table that describes the scenario that is evaluated for each impact threshold.

3.0.4 Mitigation Measures

If the Draft EIR analysis determines that a significant impact would occur, the impact is classified as significant, and mitigation measures are identified that would reduce, eliminate, or avoid the adverse effect. Mitigation measures identified in this Draft EIR were developed in accordance with CEQA Guidelines Section 15126.4(a)(1)(A), which states:

> The discussion of mitigation measures shall distinguish between measures that are proposed by project proponents to be included in a project and other measures proposed by the lead, responsible, or trustee agency or other persons that were not included but the agency determines could reasonably be expected to reduce adverse impacts if required as conditions of approving the project. This discussion shall identify mitigation measures for each significant environmental effect identified in the EIR.

In this Draft EIR, mitigation measures are provided immediately following each significant or potentially significant impact. Project-specific mitigation measures are alphanumerically numbered to correspond to the impacts they address. For example, project-specific Mitigation Measure BIO-1-A refers to the first mitigation measure for Impact BIO-1 in Section 3.2, *Biological Resources*.

If the project is approved by the City Council, a Mitigation Monitoring and Reporting Program (MMRP) must be adopted. Pursuant to CEQA Guidelines Section 15097, an MMRP is a mechanism for monitoring and reporting revisions to a project or conditions of approval that the public agency required as mitigation to lessen or avoid a significant environmental effect. The City can conduct the reporting or monitoring, or it can delegate the responsibilities to another public agency or private entity that accepts the delegation. The MMRP for the project will identify the specific monitoring actions that shall be completed, the various city departments or other entities that shall oversee completion of the mitigation, and a timeline for implementation of the measures. The responsible entities must ensure that due diligence is carried out during implementation of the measures. Implementation of the MMRP would eliminate or reduce the severity of the significant impacts identified in the EIR.

3.0.5 Classification of Impacts

In accordance with CEQA Guidelines Section 15022(a), the City of San Bruno uses the impact significance criteria designated by CEQA and suggested by CEQA Guidelines Appendix G. These criteria, as well as the Office of Planning and Research Technical Advisory on Evaluating Transportation Impacts in CEQA (December 2018), are used to evaluate the impacts of the project throughout this document. These criteria are listed at the beginning of the *Environmental Impacts* subsection under *Thresholds of Significance* throughout this chapter.

In determining whether impacts are significant, an EIR compares the potential impacts of a project with pre-project environmental conditions. CEQA Guidelines Sections 15125(a) and 15126.2(a) specify that the baseline normally consists of physical conditions that existed at the time the Notice of Preparation (NOP) was published or the time the environmental analysis began. With the project, the NOP release date of December 14, 2023, serves as the environmental baseline from which impacts of the project are generally measured. However, for some resource areas with data gathered at a later date, this later date is considered the baseline and noted in each resource section, as needed.

For each impact identified, a level of significance is determined, using the following listed classifications. Significance determinations are indicated in ***bold, italicized*** text.

- ***No Impact.*** No impact denotes situations in which there is no possibility of an adverse effect on the environment.
- ***Less than Significant.*** Less-than-significant impacts are effects that are noticeable but not at a level that would exceed established or defined thresholds or effects that are already reduced to a level below such thresholds (e.g., through compliance with applicable laws or features of the project).
- ***Less than Significant with Mitigation.*** Less than significant with mitigation is the conclusion when impacts would be significant or potentially significant, but implementation of project-specific mitigation measures would reduce impacts to a level of less than significant.
- ***Significant and Unavoidable.*** Significant and unavoidable is the conclusion if impacts are identified as significant or potentially significant, and mitigation measures would not diminish the effects to less-than-significant levels.

In this chapter, impacts are defined using an alphanumeric system that identifies the environmental topic associated with the impact. For example, NOI-1 denotes the first impact in Section 3.10, *Noise*. The abbreviated codes used to identify the environmental issues discussed in this chapter are listed below.

- AQ – Air Quality
- BIO – Biological Resources
- CUL – Cultural Resources
- EN – Energy
- GEO – Geology, Soils, and Paleontology
- GHG – Greenhouse Gases
- HAZ – Hazards and Hazardous Materials
- HWY – Hydrology and Water Quality
- LU – Land Use
- NOI – Noise and Vibration
- POP – Population and Housing
- PS – Public Services
- REC - Recreation
- TRA – Transportation
- TCR – Tribal Cultural Resources
- UT – Utilities

3.0.6 Information Incorporated by Reference

The project site was evaluated as Housing Opportunity Site 14 in the *2023–2031 Housing Element Update Initial Study/Mitigated Negative Declaration* (Housing Element Update IS/MND), which was adopted by the City of San Bruno on January 24, 2023 per City Council Resolution No. 2023-08 (State Clearinghouse No. 2022120217).[1] The Housing Element Update IS/MND evaluated the development of up to 1,000 residential dwelling units on the project site at a program level. This EIR incorporates by reference information or analysis from the Housing Element Update IS/MND. As required in CEQA Guidelines Section 15150, where an EIR uses incorporation by reference, the incorporated part of the reference document shall be briefly summarized or described. Where information from the above-listed documents is incorporated into this EIR, the incorporated information is briefly summarized or described in the corresponding topic section in this chapter.

[1] The adopted Housing Element includes the project site as Housing Opportunity Site 20.

Copies of the Housing Element Update IS/MND are available to the public at this location:

San Bruno Community Development Department
567 El Camino Real
San Bruno, CA 94066

An electronic copy is available at: https://sanbruno.ca.gov/568/2023-2031-Housing-Element-Update (accessed May 8, 2025).

3.0.7 Impacts Found Not to Be Significant

CEQA Guidelines Section 15128 states, "An EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR." During the scoping process for this Draft EIR, the City determined that implementation of the project would not result in significant environmental impacts on aesthetics, agriculture and forestry resources, mineral resources, and wildfire. Therefore, these issues are not discussed in detail in this Draft EIR. The following discussion describes the basis for the City's determination with regard to each of these topics.

3.0.7.1 Aesthetics

In accordance with PRC Section 21099, Modernization of Transportation Analysis for Transit-Oriented Projects, aesthetics and parking shall not be considered in determining if a project has the potential to result in significant environmental effects, provided the project meets all of the following criteria under PRC Section 21099.

- The project is on an infill site.[2]
- The project is in a Transit Priority Area (TPA).[3]
- The project is a residential, mixed-use residential, or employment center project.[4]

The project meets the above criteria as a qualifying mixed-use residential project on an infill site within a TPA for purposes of PRC Section 21099; therefore, aesthetics is not further analyzed in this EIR. The project site is a qualifying infill site that is currently developed with existing commercial facilities. The entire perimeter of the project site adjoins urban uses or public rights-of-way. The Metropolitan Transportation Commission (MTC) has identified locations of TPAs within the Bay Area (Metropolitan Transportation Commission 2021). MTC mapping indicates that the entire project site is within a TPA due to its proximity to the San Bruno Bay Area Rapid Transit (BART) station and qualifying SamTrans bus routes. The project site is zoned Planned Development (PD) under the City's Zoning Code. The project would rezone the site to a new Planned Development (PD) zoning to allow redevelopment of the project site with a transit-oriented, mixed-use development including housing; retail uses; life-science laboratory uses; office uses; private and publicly

[2] An *infill site* is a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses (PRC section 21099 (a)(4)).

[3] A TPA is an area within 0.5 mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program or applicable regional transportation plan (PRC Section 21099 (a)(7)).

[4] An *employment-center project* is a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a TPA (PRC Section 21099 (a)(1)).

accessible uses, privately owned open space; and potentially a hotel. The project would construct approximately 2,169,041 to 2,330,461 square feet of net new development on the project site. The proposed floor area ratio would range from 0.4 to 3.7, with an average site-wide floor area ratio at full build in excess of 0.75. Therefore, the project qualifies as an employment center project.

Because the project meets the three criteria above, this EIR does not consider aesthetics in determining the significance of impacts under CEQA.

3.0.7.2 Agriculture and Forestry Resources

The project site is in a developed portion of San Mateo County, which is classified as Urban and Built-Up Land by the California State Department of Conservation (DOC 2020). There is no designated important farmland (including Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Important) within or adjacent to the project site (DOC 2020). There is no grazing land within or adjacent to the project site. The project site does not contain Williamson Act land or other land zoned for agricultural uses (DOC 2024a). For these reasons, the project would have no impact on farmland or agricultural resources. No mitigation is required.

PRC Section 12220(g) defines forest land 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, visual resources, fish and wildlife, biodiversity, water quality, recreation, and other public benefits. The project site is in an urban environment and has been developed. None of the landscaped areas on the project site support 10 percent native tree cover under natural conditions that would allow for the management of the forest resources included in the PRC definition of forest land. Therefore, the project would have no impact on forestry resources. No mitigation is required.

3.0.7.3 Mineral Resources

The project site is in a developed urbanized portion of San Bruno that has been disturbed by development. The project site is not within a City-designated Mineral Resource Zone or in an area classified by the California Geologic Survey as having significant mineral deposits (DOC 2024b). The list of mines from the Office of Mine Reclamation (the Assembly Bill [AB] 3098 List), which lists mines that are regulated under the Surface Mining and Reclamation Act, does not include any mines within the area of the project site (DOC 2024c). In addition, the project site has not been designated as a locally important mineral resource recovery site in the *San Bruno General Plan*, any specific plan, or other land use plan. Therefore, the project would have no impact on the loss of availability of a known statewide or regionally important mineral resource or a locally important mineral resource recovery site. No mitigation is required.

3.0.7.4 Wildfire

The project site is in a developed urban environment. The topography of the project site and the surrounding area is relatively flat. There is no wildland vegetation cover on the project site or in the surrounding area. According to the California Department of Forestry and Fire Protection (CAL FIRE), the entire City, including the project site, is in a non-Very High Fire Hazard Severity Zone (VHFHSZ) (CAL FIRE 2007). In addition, there are no mapped State Responsibility Areas in the city (CAL FIRE 2007). The nearest VHFHSZ in a State Responsibility Area is approximately 2 miles southwest of the project site, near the City of Millbrae. Therefore, there would be no impact with respect to exacerbating wildfire risks. No mitigation is required.

3.0.8 References

California Department of Conservation (DOC). 2020. *San Mateo County Important Farmland 2020.* Available: https://www.conservation.ca.gov/dlrp/fmmp/Pages/SanMateo.aspx. Accessed: December 2, 2024.

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Metropolitan Transportation Commission. 2021. *Open Data Catalog, Transit Priority Areas.* Available: https://opendata.mtc.ca.gov/search?q=transit%20priority%20areas. Accessed: December 2, 2024.

3.1 Air Quality

3.1.1 Introduction

This section evaluates the potential impacts on air quality that could result from construction and operation of the Tanforan Redevelopment Project (project). It also outlines existing conditions at the project site and the regulatory framework for this analysis. Additionally, it describes the impacts resulting from implementation of the project and feasible mitigation measures, where applicable.

Relevant technical documentation used in this analysis including air quality modeling files and other data are included in Appendix 3.1-1, *Air Quality and Greenhouse Gas Technical Appendix*.

Issues identified in response to the Notice of Preparation (NOP) (Appendix 1-1, *Notice of Preparation and Comments Received on the Notice of Preparation*) were considered in preparing this analysis. The NOP comments pertaining to air quality include a recommendation by the San Francisco International Airport (SFO) Bureau of Planning and Environmental Affairs to quantify construction and operational air pollutant emissions; mitigate impacts to the maximum feasible extent; assess health risks for all existing and future sensitive receptors within 1,000 feet of the site; and evaluate cumulative impacts, accounting for all existing and planned sources of toxic air contaminants (TACs) and fine particulate matter (PM) within 1,000 feet of the site. These issues are addressed in Section 3.1.3.4, *Impacts and Mitigation Measures*.

3.1.2 Existing Conditions

3.1.2.1 Regulatory Setting

This section summarizes regulations and policies that are relevant to the analysis of the project's potential impacts on air quality.

Federal

The federal Clean Air Act (CAA) and its subsequent amendments form the basis for the nation's air pollution control effort. The U.S. Environmental Protection Agency (EPA) is responsible for implementing most aspects of the CAA. The National Ambient Air Quality Standards (NAAQS) for criteria pollutants are a key element of the CAA, which delegates enforcement of the NAAQS to the states. The CAA requires that a State Implementation Plan (SIP) or an air quality control plan be prepared for areas with air quality that violates the NAAQS. The SIP sets forth the strategies and pollution control measures that states will use to attain the NAAQS. The CAA requires attainment plans to demonstrate a 5 percent reduction per year in nonattainment air pollutants or their precursors, averaged every consecutive 3-year period, unless an approved alternative measure of progress is developed. Air quality attainment plans outline emissions limits and control measures for achieving and maintaining the standards by the earliest practical date. In California, the California Air Resources Board (CARB) is responsible for reviewing and approving SIP elements prepared by local air districts and other agencies, as well as submitting SIP revisions to EPA for approval and publication in the *Federal Register*. CARB delegates regulatory authority for stationary

sources and other air quality management responsibilities to local air agencies. The Bay Area Air District (Air District)[1] is the local air agency for the project area.

Clean Air Act and National Ambient Air Quality Standards

The federal CAA was enacted in 1963 and amended numerous times in subsequent years (1965, 1967, 1970, 1977, and 1990). The federal CAA establishes federal air quality standards, known as NAAQS, and specifies future dates for achieving compliance. The federal CAA also requires each state to submit and implement a SIP for local areas that fail to meet the standards. The plan must include pollution control measures that demonstrate how the standards will be met.

The 1990 amendments to the federal CAA identify specific emissions reduction goals for areas that fail to meet the NAAQS. These amendments require both a demonstration of reasonable progress toward attainment and incorporation of additional sanctions for failure to attain or meet interim milestones. Table 3.1-1 shows the NAAQS that are currently in effect for each criteria pollutant. The California Ambient Air Quality Standards (CAAQS) (discussed below) are provided for reference.

Table 3.1-1. Federal and State Ambient Air Quality Standards

Criteria Pollutant	Average Time	California Standards	National Standards [a]	
			Primary	Secondary
Ozone	1 hour	0.09 ppm	None [b]	None [b]
	8 hours	0.070 ppm	0.070 ppm	0.070 ppm
Particulate matter (PM_{10})	24 hours	50 mg/m^3	150 mg/m^3	150 mg/m^3
	Annual mean	20 mg/m^3	None	None
Fine particulate matter ($PM_{2.5}$)	24 hours	None	35 mg/m^3	35 mg/m^3
	Annual mean	12 mg/m^3	9.0 mg/m^3	15.0 mg/m^3
Carbon monoxide	8 hours	9.0 ppm	9 ppm	None
	1 hour	20 ppm	35 ppm	None
Nitrogen dioxide	Annual mean	0.030 ppm	0.053 ppm	0.053 ppm
	1 hour	0.18 ppm	0.100 ppm	None
Sulfur dioxide [c]	Annual mean	None	0.030 ppm	None
	24 hours	0.04 ppm	0.14 ppm	None
	3 hours	None	None	0.5 ppm
	1 hour	0.25 ppm	0.075 ppm	None
Lead	30-day average	1.5 mg/m^3	None	None
	Calendar quarter	None	1.5 mg/m^3	1.5 mg/m^3
	3-month average	None	0.15 mg/m^3	0.15 mg/m^3
Sulfates	24 hours	25 mg/m^3	None	None
Visibility-reducing particles	8 hours	—[d]	None	None
Hydrogen sulfide	1 hour	0.03 ppm	None	None
Vinyl chloride	24 hours	0.01 ppm	None	None

[1] The Bay Area Air Quality Management District changed its name to the Bay Area Air District in January 2025 and will be referred to as the Bay Area Air District or simply the Air District herein.

Source: CARB 2024f.

CAAQS = California Ambient Air Quality Standards; NAAQS = National Ambient Air Quality Standards; ppm = parts per million; mg/m^3 = micrograms per cubic meter

[a] National standards are divided into primary and secondary standards. Primary standards are intended to protect public health, whereas secondary standards are intended to protect public welfare and the environment.

[b] The federal 1-hour standard of 12 parts per hundred million was in effect from 1979 through June 15, 2005. The revoked standard is referenced because it was employed for such a long period and is a benchmark for SIPs.

[c] The annual and 24-hour NAAQS for sulfur dioxide apply for only 1 year after designation of the new 1-hour standard in areas that were previously nonattainment areas for the 24-hour and annual NAAQS.

[d] The CAAQS for visibility-reducing particles is defined by an extinction coefficient of 0.23 per kilometer (visibility of 10 miles or more due to particles when relative humidity is less than 70 percent).

Corporate Average Fuel Economy Standards

The National Highway Traffic Safety Administration (NHTSA) Corporate Average Fuel Economy (CAFE) standards require substantial improvements in fuel economy and reductions in greenhouse gas (GHG) emissions generated by passenger cars and light-duty trucks sold in the United States. The current CAFE standards require an industry-wide fleet average of approximately 49 miles per gallon (mpg) for passenger cars and light trucks in model year 2026, by increasing fuel efficiency by 8 percent annually for model years 2024 and 2025, and 10 percent annually for model year 2026. Phase 2 of the Greenhouse Gas Emissions Standards and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles applies to model years 2019 through 2027 for medium- and heavy-duty vehicles.

In June 2024, NHTSA issued the final CAFE standards for passenger cars and light trucks and fuel efficiency standards for model years 2027 through 2031 that increase at a rate of 2 percent per year for passenger cars and light trucks. The proposal also includes new fuel efficiency standards for heavy-duty pickup trucks and vans for model years 2030 through 2032 and 2033 through 2035 that increase at a rate of 10 percent per year and 8 percent per year, respectively.

With the change in federal administration in January 2025, it is likely that NHTSA will propose changes to the CAFE standards. However, no revisions have been formally proposed yet, and revisions will need to go through a lengthy rule-making process.

Emissions Standards for Non-Road Diesel Engines

EPA has established a series of increasingly strict emissions standards for new off-road diesel equipment and on-road diesel trucks. Tier 1 standards were phased in on newly manufactured equipment from model years 1996 through 2000, depending on the engine horsepower category. Tier 2 standards were phased in on newly manufactured equipment from model years 2001 through 2006. Tier 3 standards were phased in on newly manufactured equipment from model years 2006 through 2008. Tier 4 standards, which require advanced emissions control technology, were phased in from model years 2008 through 2015. New construction equipment used for the project, including heavy-duty trucks and off-road construction equipment, would be required to comply with the emissions standards.

State

California Clean Air Act and California Ambient Air Quality Standards

The California Clean Air Act (CCAA) established a statewide air pollution control program in 1988. The CCAA requires all air districts in the state to endeavor to meet the CAAQS by the earliest practical date. Unlike the federal CAA, the CCAA does not set precise attainment deadlines. Instead, the CCAA establishes increasingly stringent requirements for areas that require more time to achieve the standards. The CAAQS are generally more stringent than the NAAQS and incorporate additional standards for sulfates, hydrogen sulfide, visibility-reducing particles, and vinyl chloride. The CAAQS and NAAQS are both listed in Table 3.1-1.

CARB and local air districts are responsible for achieving California's air quality standards. The standards are to be achieved through district-level air quality management plans, which are incorporated into the SIP. In California, EPA has delegated authority to prepare SIPs to CARB, which has delegated that authority to individual air districts (CARB reviews and approves SIP elements prepared by air districts before submitting SIP revisions to EPA for approval and publication in the *Federal Register*). CARB has traditionally established state air quality standards, maintained oversight authority for air quality planning, developed programs to reduce emissions from mobile sources, developed air emissions inventories, collected air quality and meteorological data, and approved SIPs.

The CCAA substantially increases the authority and responsibilities of air districts. It designates air districts as lead air quality planning agencies, requires air districts to prepare air quality plans, and grants air districts the authority to implement transportation control measures.

The CCAA also emphasizes control of "indirect and area-wide sources" of air pollutant emissions. It gives local air pollution control districts explicit authority to regulate indirect sources of air pollution and establish traffic control measures.

Statewide Truck and Bus Regulation

Originally adopted in 2005, the on-road truck and bus regulation requires heavy trucks to be retrofitted with PM filters. The regulation applies to all diesel-fueled trucks operating in California with a gross vehicle weight rating greater than 14,000 pounds. Compliance with the regulation can be reached through one of two paths: (1) vehicle retrofits, according to engine year, or (2) a phase-in schedule. Compliance paths were established to ensure that, by January 2023, nearly all trucks and buses would have 2010 model year engines or newer.

Small Off-Road Engines Program

CARB first adopted emissions standards for small off-road engines (SORE) in 1990. SORE are spark-ignition engines rated at or below 19 kilowatts primarily used for lawn, garden, and other small off-road equipment. In December 2021, CARB approved an amendment to the 1990 SORE regulations requiring most newly manufactured SORE, including landscaping equipment, to be zero emission starting in 2024 (CARB 2021).

Vehicle Efficiency and Zero-Emissions Standards

Assembly Bill (AB) 1493 (Pavley I) required CARB to develop and implement regulations to reduce automobile and light-truck emissions. These stricter emissions standards apply to automobiles and light trucks beginning with model year 2009. Additional strengthening of the Pavley standards (referred to previously as Pavley II and now referred to as the Advanced Clean Cars measure) was adopted for vehicle model years 2017–2025 in 2012. Together, the two standards are expected to increase average fuel economy to roughly 54.5 mpg in 2025.

In August 2022, CARB voted to approve the Advanced Clean Cars II proposal, which would dramatically reduce emissions from passenger cars for model years 2026 through 2035. This requires an increasing proportion of new vehicles to be zero-emissions vehicles (ZEVs), with the goal of 100 percent ZEVs for new vehicles sold by 2035 (CARB 2024a). However, the future of this proposal is uncertain because of the change in the federal administration.

CARB also adopted the Advanced Clean Truck Regulation to accelerate a large-scale transition of medium- and heavy-duty ZEVs. The regulation requires the sale of medium- and heavy-duty ZEVs as an increasing percentage of total annual California sales from 2024 to 2035. By 2035, zero-emissions truck/chassis sales would need to be 55 percent of Class 2b–3 truck sales, 75 percent of Class 4–8 straight truck sales, and 40 percent of truck tractor sales. By 2045, every new medium- and heavy-duty truck sold in California would be ZEVs. Large employers including retailers, manufacturers, brokers, and others are required to report information about shipments and shuttle services to better ensure that fleets purchase available zero-emissions trucks. However, due to the change in the federal administration, this regulation was withdrawn by CARB in January 2025 (CalMatters 2025).

Toxic Air Contaminant Regulation

California regulates TACs primarily through the Toxic Air Contaminant Identification and Control Act (Tanner Act) and the Air Toxics "Hot Spots" Information and Assessment Act of 1987 (Hot Spots Act). In the early 1980s, CARB established a statewide comprehensive air toxics program to reduce exposure to air toxics. The Tanner Act created California's program to reduce exposure to air toxics. The "Hot Spots" Act supplements the Tanner Act by requiring a statewide air toxics inventory, notification of people exposed to a significant health risk, and facility plans to reduce these risks.

CARB identified diesel particulate matter (DPM) as a TAC and approved a comprehensive Diesel Risk Reduction Plan to reduce emissions from both new and existing diesel-fueled engines and vehicles (CARB 2000). CARB plans to continue its efforts to reduce DPM emissions and estimates that by 2035 DPM emissions will be less than half of what they were in 2010 (CARB 2024e).

Building Energy Efficiency Standards (Title 24, Parts 6 and 11)

The energy consumption of new residential and nonresidential buildings in California is regulated by the California Code of Regulations (CCR), Title 24, Part 6, Building Energy Efficiency Standards (California Energy Code), and Part 11, California Green Building Standards Code (CALGreen). The California Energy Commission updates the California Energy Code every 3 years with more stringent design requirements to reduce energy consumption, resulting in lower GHG emissions. The 2022 California Energy Code, which took effect on January 1, 2023, requires builders to use more energy-efficient building technologies than those required by the 2019 version of the California Energy Code to comply with requirements regarding energy use. Similarly, CALGreen is updated every

3 years; the 2022 version of CALGreen took effect on January 1, 2023, with a supplemental edition taking effect on July 1, 2024. CALGreen contains mandatory and voluntary provisions for energy efficiency, water efficiency and conservation, material conservation, and resource efficiency.

Airborne Toxic Control Measure for Construction, Grading, Quarrying, and Surface Mining Operations

Asbestos is a naturally occurring mineral that was previously used in building construction because of its heat resistance and strong insulating properties. In 2001, CARB adopted an Airborne Toxic Control Measure (ATCM) for Construction, Grading, Quarrying, and Surface Mining Operations to minimize the release of asbestos fibers during activities involving the handling of asbestos (CARB 2024d). The ATCM requires work practices to minimize asbestos emissions from such activities where naturally occurring asbestos is found or is likely to be found (CARB 2024d).

Air Pollution and Health and Equity Regulation

California has advanced several policies and regulations to address and center health and equity as part of public planning. Many of these regulations have a nexus with air quality. Senate Bill (SB) 535 recognizes that environmental pollution has had a disproportionate effect on disadvantaged communities, and requires these areas be prioritized for emissions reduction projects funded by California's cap-and-trade program. AB 1550 expanded funding prioritization from cap-and-trade proceeds to include low-income communities. AB 617 requires the state to monitor and report criteria pollutant and TAC emissions for certain stationary sources. The bill also requires development of a statewide plan to reduce these emissions in communities that experience a high cumulative exposure burden. In response to AB 617, CARB developed the Community Air Protection Program, which includes air monitoring and emissions reductions programs, initially focused on ten designated communities throughout California.

Regional and Local

Bay Area Air District

At the local level, responsibilities of air quality districts include overseeing stationary-source emissions, approving permits, maintaining emissions inventories, maintaining air quality stations, overseeing agricultural burning permits, and reviewing air quality–related sections of environmental documents required by the California Environmental Quality Act (CEQA). The air quality districts are also responsible for establishing and enforcing local air quality rules and regulations that address the requirements of federal and state air quality laws and for ensuring that the NAAQS and CAAQS are met.

The project site falls within the geographic jurisdiction of the Bay Area Air District, which has local air quality jurisdiction over certain stationary sources in the San Francisco Bay Area Air Basin (SFBAAB) including San Mateo County. The project is a land use development, and while it proposes some individual emissions sources requiring permits from the Air District, such as emergency generators, its overall construction and operation are not directly regulated by the Air District. However, the Air District has also developed advisory emissions thresholds to assist CEQA lead agencies in determining the level of significance of a project's emissions, which are outlined in its *California Environmental Quality Act Air Quality Guidelines*, as described here.

Air Quality Plans

The Air District has also adopted air quality plans to improve air quality, protect public health, and protect the climate, including the 2017 *Clean Air Plan: Spare the Air, Cool the Climate* (2017 Clean Air Plan). As described in the above discussion regarding federal air pollution regulations, the CAA requires a SIP or an air quality control plan to be prepared for areas with air quality that violates the NAAQS. The Air District's 2017 Clean Air Plan, adopted on April 19, 2017, is the current air quality attainment plan for the SFBAAB (BAAQMD 2017b). It defines control strategies to reduce emissions and ambient concentrations of air pollutants; safeguards public health by reducing exposure to air pollutants that pose the greatest health risk, with an emphasis on protecting the communities most heavily affected by air pollution; and reduces GHG emissions to protect the climate. In addition, the 2017 Clean Air Plan updates the prior 2010 Bay Area ozone plan and outlines feasible measures to reduce ozone; provides a control strategy for reducing PM, air toxics, and GHGs in a single integrated plan; and establishes emissions control measures that can be adopted or implemented.

Specifically, the 2017 Clean Air Plan does the following.

- Describes the Bay Area Air District's plan for attaining all state and federal air quality standards and eliminating health risk disparities from exposure to air pollution among Bay Area communities.
- Defines a vision for transitioning the region to the post-carbon economy needed to achieve ambitious GHG reduction targets for 2030 and 2050.
- Provides a regional climate protection strategy that will put the Bay Area on a pathway to achieving GHG reduction targets.
- Includes a wide range of control measures to decrease emissions of the air pollutants that are most harmful to Bay Area residents, such as PM, ozone, and TACs; reduce emissions of methane and other GHGs with high global warming potential that are potent climate pollutants in the near term; and decrease emissions of carbon monoxide (CO) by reducing fossil fuel combustion.

In addition to air quality plans, the Air District also adopts rules and regulations to improve existing and future air quality. The project may be subject to the following Air District rules.

- Regulation 2, Rule 2 (New Source Review)—This regulation contains requirements for best available control technology and emissions offsets.
- Regulation 2, Rule 5 (New Source Review of Toxic Air Contaminant)—This regulation outlines guidance for evaluating TAC emissions and their potential health risks.
- Regulation 6, Rule 1 (Particulate Matter)—This regulation restricts emissions of PM darker than a 1 on the Ringlemann Chart to less than 3 minutes in any 1 hour.
- Regulation 7 (Odorous Substances). This regulation establishes general odor limitations on odorous substances and specific emissions limitations on certain odorous compounds.
- Regulation 8, Rule 3 (Architectural Coatings). This regulation limits the quantity of reactive organic gas (ROG) in architectural coatings.
- Regulation 9, Rule 8 (Stationary Internal-Combustion Engines). This regulation limits emissions of nitrogen oxides (NO_X) and carbon monoxide (CO) from stationary internal-combustion engines of more than 50 horsepower.

- Regulation 11, Rule 2 (Hazardous Pollutants – Asbestos Demolition, Renovation, and Manufacturing). This regulation, which incorporates EPA's National Emissions Standards for Hazardous Air Pollutants, controls emissions of asbestos to the atmosphere during demolition, renovation, and manufacturing.

Bay Area Air District California Environmental Quality Act, Air Quality Guidelines

The Air District's *California Environmental Quality Act, Air Quality Guidelines* (CEQA Air Quality Guidelines) were prepared to assist in the evaluation of the air quality impacts of projects and plans proposed within the Bay Area. The CEQA Air Quality Guidelines provide recommended procedures for evaluating potential air impacts during the environmental review process, consistent with CEQA requirements, and include recommended thresholds of significance, mitigation measures, and background air quality information. They also include recommended assessment methodologies for air toxics and odors.

The Air District published the most recent version of the CEQA Air Quality Guidelines in April 2023 (BAAQMD 2023). The 2022 CEQA Air Quality Guidelines include guidance for evaluating plan- and project-level air quality and climate impacts, as well as best practices for centering environmental justice, health, and equity thresholds for evaluating a project's impact on air quality. This analysis was prepared consistent with guidance and recommendations from the most recent 2022 CEQA Guidelines.

San Bruno General Plan

The *San Bruno General Plan*, adopted in 2009, includes goals and policies that relate to air quality and emissions reduction (City of San Bruno 2009). These goals and policies include continuing to improve air quality by reducing emissions from construction activities, coordinating air quality planning efforts locally and regionally, and focusing improvements on non-motorized modes of transportation. The project's consistency with applicable air quality general plan policies is evaluated in Section 3.10, *Land Use and Planning*.

The *San Bruno General Plan* includes the following goals and policies, adopted for the purpose of avoiding or minimizing an environmental effect, that are associated with air quality and relevant to the project.[2]

- **ERC-25** Maintain and improve air quality by requiring project mitigation, such as Transportation Demand Management (TDM) techniques, where air quality impacts are unavoidable.
- **ERC-26** Require dust abatement actions for all new construction and redevelopment projects.
- **ERC-28** Incorporate air quality beneficial programs and policies into local planning and development activities, with a particular focus on subdivision, zoning, and site design measures that reduce the number and length of single-occupant automobile trips.
- **ERC-30** Encourage new residential developments to incorporate measures such as shuttle services to major employment centers, commercial areas and transit areas, and provision of adequate transit facilities.

[2] The *San Bruno General Plan* also includes policies associated with Transportation, encouraging transportation alternatives, such as walking, bicycling, carpooling, transit-ridership, and flex-scheduling, which reduce transportation-related air pollutant emissions.

- **ERC-32** Coordinate air quality planning efforts with local, regional, and State agencies. Support the Bay Area Air Quality Management District's efforts to monitor and control air pollutants from stationary sources.
- **ERC-33** Require all large construction projects to mitigate diesel exhaust emissions through use of alternate fuels and control devices.
- **ERC-34** Require that adequate buffer distances be provided between odor sources and sensitive receptors, such as schools, hospitals, and community centers.

3.1.2.2 Environmental Setting

This section provides a discussion of existing conditions related to air quality in the study area. The project site is located within the SFBAAB. Ambient air quality is affected by climatological conditions, topography, and the types and amounts of pollutants emitted. The following discussion summarizes relevant characteristics of the SFBAAB, key pollutants of concern, and existing ambient pollutant concentrations. This section also describes regional and local climate conditions, existing air quality conditions, and sensitive receptors that may be affected by project-generated emissions.

The following information is drawn from the relevant oversight agencies, which are the Bay Area Air District, CARB, and EPA.

Regional Setting

Pollutants of Concern

Criteria Air Pollutants

The following provides a discussion of the primary and secondary criteria air pollutants of key concern. In general, primary pollutants are directly emitted into the atmosphere, and secondary pollutants are formed by chemical reactions in the atmosphere. The principal characteristics of the primary criteria pollutants and the possible health and environmental effects from exposure are summarized in Table 3.1-2 and described in more detail in this section.

Table 3.1-2. Sources and Health Effects of Air Pollutants

Pollutant	Sources	Primary Effects
Ozone	• Precursor sources: motor vehicles, industrial emissions, and consumer products. [a]	• Respiratory symptoms. • Worsening of lung disease, leading to premature death. • Damage to lung tissue. • Crop, forest, and ecosystem damage. • Damage to a variety of materials, including rubber, plastics, fabrics, paints, and metals.
Particulate matter less than 2.5 microns in aerodynamic diameter ($PM_{2.5}$)	• Cars and trucks (especially diesel vehicles). • Fireplaces and wood stoves. • Windblown dust from roadways, agriculture, and construction.	• Premature death. • Hospitalization for worsening of cardiovascular disease. • Hospitalization for respiratory disease. • Asthma-related emergency room visits. • Increased asthma symptoms and increased inhaler usage.

Pollutant	Sources	Primary Effects
Particulate matter less than 10 microns in aerodynamic diameter (PM_{10})	• Cars and trucks (especially diesel vehicles). • Fireplaces and wood stoves. • Windblown dust from roadways, agriculture, and construction.	• Premature death and hospitalization, primarily from worsening of respiratory disease. • Reduced visibility and material soiling.
Nitrogen oxide (NO_X)	• Any source that burns fuel, such as cars, trucks, construction and farming equipment, and residential heaters and stoves.	• Lung irritation. • Enhanced allergic responses.
Carbon monoxide (CO)	• Any source that burns fuel, such as cars, trucks, construction and farming equipment, and residential heaters and stoves.	• Chest pain in patients with heart disease. • Headaches. • Light-headedness. • Reduced mental alertness.
Sulfur oxide (SO_X)	• Combustion of sulfur-containing fossil fuels. • Smelting of sulfur-bearing ores. • Industrial processes.	• Worsening of asthma (e.g., increased symptoms, increased medication usage, emergency room visits).
Lead (Pb)	• Contaminated soil. • Lead-based paints.	• Impaired mental functioning in children. • Learning disabilities in children. • Brain and kidney damage.
Toxic air contaminants (TACs)	• Cars and trucks (especially diesel vehicles). • Industrial sources, such as chrome platers. • Neighborhood businesses, such as dry cleaners and service stations. • Building materials and products.	• Cancer. • Reproductive and developmental effects. • Neurological effects.

Source: CARB 2025.

[a] Ozone is not generated directly by these sources. Rather, precursor pollutants from these sources (reactive organic gases and nitrogen oxides) react with sunlight to form ozone in the atmosphere.

Ozone

Ozone, the main ingredient in urban smog, is not emitted directly into the air but, rather, created by chemical reactions between hydrocarbons and NO_X, both byproducts of the internal-combustion engine, in the presence of sunlight. The CARB definition for ROGs includes all hydrocarbons except those exempted by CARB that contribute to smog formation, whereas the EPA definition for volatile organic compounds (VOCs) includes all hydrocarbons except those exempted by EPA. ROGs and VOCs are similar but not identical; although the terms are used interchangeably, ROG is used for purposes of this analysis. There are no separate NAAQS and CAAQS for ROGs. Carcinogenic forms of ROGs are TACs (e.g., benzene).

ROG consists of compounds made up primarily of hydrogen and carbon atoms. Internal combustion associated with motor vehicles is the major source of hydrocarbons. Other sources of ROGs are emissions associated with the use of paints and solvents, the application of asphalt paving, and the use of household consumer products, such as aerosols.

The two major forms of NO_X are nitric oxide (NO) and nitrogen dioxide (NO_2). NO is a colorless, odorless gas that forms from atmospheric nitrogen and oxygen when combustion takes place under high temperatures and/or high pressure. NO_2 is a reddish-brown, irritating gas formed by the combination of NO and oxygen. In addition to serving as an integral participant in ozone formation, NO_X also acts as an acute respiratory irritant and increases susceptibility to respiratory pathogens.

Ozone poses a higher risk to those who already suffer from respiratory diseases (e.g., asthma), children, older adults, and people who are active outdoors. Exposure to ozone at certain concentrations can make breathing more difficult, cause shortness of breath and coughing, inflame and damage the airways, aggregate lung diseases, increase the frequency of asthma attacks, and cause chronic obstructive pulmonary disease. Studies show associations between short-term ozone exposure and nonaccidental mortality, including deaths from respiratory issues. Studies also suggest that long-term exposure to ozone may increase the risk of respiratory-related deaths (EPA 2024a). The concentration of ozone at which health effects are observed depends on an individual's sensitivity, level of exertion (i.e., breathing rate), and duration of exposure. Studies show large individual differences in the intensity of symptomatic responses, with one study finding no symptoms to the least-responsive individual after a 2-hour exposure to 400 parts per billion of ozone and a 50 percent decrement in forced airway volume in the most responsive individual. Although the results vary, evidence suggests that sensitive populations (e.g., asthmatics) may be affected on days when the 8-hour maximum ozone concentration reaches 80 parts per billion (EPA 2024b).

In addition to human health effects, ozone has been tied to crop damage, typically in the form of stunted growth, leaf discoloration, cell damage, and premature death. Ozone can also act as corrosives and oxidants, resulting in property damage, such as the degradation of rubber products and other materials.

Carbon Monoxide

CO is a colorless, odorless, and toxic gas produced by incomplete combustion of carbon substances, such as gasoline or diesel fuel. CO is considered a local pollutant because it tends to accumulate in the air locally. The primary adverse health effect associated with CO is interference with normal oxygen transfer to the blood, which may result in tissue oxygen deprivation. Exposure to CO at high concentrations can also cause fatigue, headaches, confusion, dizziness, and chest pain. There are no ecological or environmental effects for ambient CO (CARB 2024b).

Particulate Matter

PM consists of finely divided solids or liquids, such as soot, dust, aerosols, fumes, and mists. Two forms of fine particulates are now recognized: respirable coarse particles with an aerodynamic diameter of 10 micrometers or less, or PM_{10}, and respirable fine particles with an aerodynamic diameter of 2.5 micrometers or less, or $PM_{2.5}$. Particulate discharge into the atmosphere results primarily from industrial, agricultural, construction, and transportation activities. However, wind on arid landscapes also contributes substantially to local particulate loading. PM is considered both a local and a regional pollutant.

Particulate pollution can be transported over long distances and may adversely affect humans, especially people who are naturally sensitive or susceptible to breathing problems (i.e., asthmatics). Numerous studies have linked PM exposure to premature death in people with preexisting heart or lung disease. Other symptoms of exposure may include nonfatal heart attacks, irregular heartbeats,

aggravated asthma, decreased lung function, and increased respiratory symptoms. Depending on composition, PM_{10} and $PM_{2.5}$ can also affect water quality and acidity, deplete soil nutrients, damage sensitive forests and crops, affect ecosystem diversity, and contribute to acid rain (EPA 2024c).

Sulfur Dioxide

Sulfur dioxide (SO_2) is a colorless, irritating gas with a rotten egg smell. It forms primarily from the combustion of fossil fuels containing sulfur. SO_2 is considered a local pollutant because it tends to accumulate in the air locally. High concentrations of SO_2 can result in temporary breathing impairment for asthmatic children and adults who are active outdoors. Short-term exposure of asthmatic individuals to elevated SO_2 levels during moderate activity may result in breathing difficulties that can be accompanied by symptoms such as wheezing, chest tightness, or shortness of breath. Other effects that have been associated with longer-term exposures to high concentrations of SO_2, in conjunction with high levels of PM, include aggravation of existing cardiovascular disease, respiratory illness, and alterations in lung defenses. SO_2 also is a major precursor to $PM_{2.5}$, which is a significant health concern and a main contributor to poor visibility (see also the previous discussion of health effects from PM).

Lead

Lead is a naturally occurring metal that can be a constituent of air, water, and the biosphere. It is considered a local pollutant because it tends to accumulate in the air locally. This highly toxic metal, which was used for many years in everyday products, has been found to cause a range of health effects, from behavioral problems and learning disabilities to seizures and death. Effects on children's nervous systems are one of the primary health risk concerns from lead. When lead is present in high concentrations, children can even suffer irreversible brain damage and death. Children 6 years old and under are most at risk because their bodies are growing quickly.

Since the 1980s, lead has been phased out in gasoline, reduced in drinking water, reduced in industrial air pollution, and banned or limited in consumer products. Gasoline-powered automobile engines were a major source of airborne lead through the use of leaded fuels; however, the use of leaded fuel has been mostly phased out. Since this has occurred, the ambient lead levels have dropped dramatically.

Other Criteria Pollutants

CARB has also established CAAQS for hydrogen sulfide (H_2S), sulfates, vinyl chloride, and visibility-reducing particles. These pollutants are not addressed by federal standards. Below is a summary of these pollutants and a description of their physical properties, health and other effects, sources, and the extent of the problems.

Hydrogen sulfide emissions often are associated with geothermal activity, oil and gas production, refining, sewage treatment plants, and confined animal-feeding operations. H_2S in the atmosphere would most likely oxidize into SO_2, which can lead to acid rain. At low concentrations, H_2S may cause dizziness, headaches, and irritation to the eyes, mucous membranes, and respiratory system. In high concentrations, H_2S is extremely hazardous (i.e., 800 parts per million can cause death), especially in enclosed spaces. The Occupational Safety and Health Administration has the primary responsibility for regulating workplace exposure to H_2S.

Sulfates are another particulate product that result from the combustion of sulfur-containing fossil fuels; however, the majority of ambient sulfates are formed in the atmosphere. When SO_2 comes in contact with oxygen, it precipitates out into sulfates. The health effects associated with SO_2 and sulfates, more commonly known as sulfur oxides (SO_X), include respiratory illnesses, decreased pulmonary-disease resistance, and aggravation of cardiovascular diseases. When acidic pollutants and particulates are also present, SO_2 tends to have an even more toxic effect. Increased PM derived from SO_2 emissions also contributes to impaired visibility. In addition to particulates, sulfur trioxide and sulfate ion are precursors to acid rain; SO_X and NO_X are the leading precursors to acid rain, which can lead to corrosion of human-made structures and cause acidification of water bodies.

Visibility-reducing particles consist of PM generated from a variety of natural and human-made sources. They vary greatly in shape, size, and chemical composition. Some haze-causing particles (e.g., windblown dust and soot) are directly emitted into the air, whereas others are formed in the air from the chemical transformation of gaseous pollutants (e.g., sulfates, nitrates, organic carbon particles), which are the major constituents of fine PM. These fine particles, caused largely by the combustion of fuel, can travel hundreds of miles and cause visibility impairment. California has been labeled unclassified for visibility—CARB has not established a method for measuring visibility with the precision and accuracy needed to designate areas as attainment or nonattainment areas.

Vinyl chloride is a colorless, sweet-smelling gas at ambient temperature. Landfills, publicly owned treatment works, and polyvinyl chloride production are the major identified sources of vinyl chloride emissions in California. Polyvinyl chloride can be fabricated into several products, such as pipes, pipe fittings, and plastic materials. In humans, epidemiological studies of occupationally exposed workers have linked vinyl chloride exposure to development of liver angiosarcoma, a rare cancer, and have suggested a relationship between exposure and lung and brain cancers.

Toxic Air Contaminants

Although ambient air quality standards have been established for criteria pollutants, no ambient standards exist for TACs. Many pollutants are identified as TACs because of their potential to increase the risk of developing cancer or because of their acute or chronic health risks. For TACs that are known or suspected carcinogens, CARB has consistently found that there are no levels or thresholds below which exposure is risk free. Individual TACs vary greatly in the risks they present. At a given level of exposure, one TAC may pose a hazard that is many times greater than another. TACs are identified and their toxicity is studied by the Office of Environmental Health Hazard Assessment (OEHHA).

Diesel Particulate Matter

DPM is generated by diesel-fueled equipment and vehicles. Within the Bay Area, the Bay Area Air District has found that of all controlled TACs, emissions of DPM are responsible for about 82 percent of the total ambient cancer risk (BAAQMD 2017b). Short-term exposure to DPM can cause acute irritation (e.g., eye, throat, bronchial), neurophysiological symptoms (e.g., lightheadedness, nausea), and respiratory symptoms (e.g., cough, phlegm). EPA has determined that diesel exhaust is “likely to be carcinogenic to humans by inhalation” (EPA 2003).

Laboratory Toxic Air Contaminants

According to the *Health Risk Assessment conducted for the University of California, Davis 2017 Long-Range Development Plan* by Yorke Engineering (Yorke Engineering 2018), research laboratories are known to emit a variety of TAC emissions. Such emissions would occur with the use of the different solvents, preservatives, acids, and other chemicals that are typically found in a laboratory setting.

Naturally Occurring Asbestos

Asbestos is the name given to several naturally occurring fibrous silicate minerals. Before the adverse health effects of asbestos were identified, asbestos was widely used as insulation and fireproofing in buildings, and it can still be found in some older buildings. It is also found in its natural state in rock or soil. The inhalation of asbestos fibers into the lungs can result in a variety of adverse health effects, including inflammation of the lungs, respiratory ailments (e.g., asbestosis, a scarring of lung tissue that results in constricted breathing), and cancer (e.g., lung cancer and mesothelioma, a cancer of the linings of the lungs and abdomen).

Odors

Although offensive odors rarely cause physical harm, they can be unpleasant and lead to considerable distress among the public. This distress often generates citizen complaints to local governments and air districts. The Air District's 2022 CEQA Guidelines identify several types of land uses as being commonly associated with odors, such as landfills, wastewater treatment facilities, food-processing facilities, painting/coating operations, and metal-smelting plants (BAAQMD 2023). Odor impacts on nearby residential areas and other sensitive receptors, such as hospitals, worker sites, day care centers, and schools, warrant the closest scrutiny, but consideration should also be given to other land uses where people may congregate, such as recreational facilities, work sites, and commercial areas.

Climate and Meteorology

Although the primary factors that determine air quality are the locations of air pollutant sources and the amount of pollutants emitted from those sources, meteorological conditions and topography are also important factors. Atmospheric conditions, such as wind speed, wind direction, and air temperature gradients interact with the physical features of the landscape to determine the movement and dispersal of air pollutants. Unique geographic features throughout California define 15 air basins with distinctive regional climates. The air quality study area is located in the peninsula region of the SFBAAB (BAAQMD 2017a).

The peninsula region extends from northwest of San Jose to the Golden Gate Bridge. The Santa Cruz Mountains run up the center of the peninsula, with elevations exceeding 2,000 feet at the southern end, decreasing to 500 feet in South San Francisco. Coastal towns experience a high incidence of cool, foggy weather in the summer. Cities in the southeastern peninsula experience warmer temperatures and fewer foggy days because the marine layer is blocked by the ridgeline to the west. San Francisco lies at the northern end of the peninsula. Because most of San Francisco's topography is below 200 feet, marine air is able to flow easily across most of the City, making its climate cool and windy.

The blocking effect of the Santa Cruz Mountains results in variations in summertime maximum temperatures in different parts of the peninsula. For example, in coastal areas and San Francisco the mean maximum summer temperatures are in the mid-60s, while in Redwood City the mean maximum summer temperatures are in the low-80s. Mean minimum temperatures during the winter months are in the high-30s to low-40s on the eastern side of the peninsula and in the low 40s on the coast.

Two important gaps in the Santa Cruz Mountains occur on the peninsula. The larger of the two is the San Bruno Gap, extending from Fort Funston on the ocean to SFO. Because the gap is oriented in the same northwest-to-southeast direction as the prevailing winds, and because the elevations along the gap are less than 200 feet, marine air is easily able to penetrate into the bay. The other gap is the Crystal Springs Gap, between Half Moon Bay and San Carlos. As the sea breeze strengthens on summer afternoons, the gap permits maritime air to pass across the mountains, and its cooling effect is commonly seen from San Mateo to Redwood City.

Annual average wind speeds range from 5 to 10 miles per hour throughout the peninsula, with higher wind speeds usually found along the coast. Winds on the eastern side of the peninsula are often high in certain areas, such as near the San Bruno Gap and the Crystal Springs Gap.

The prevailing winds along the peninsula's coast are from the west, although individual sites can show significant differences. For example, Fort Funston in western San Francisco shows a southwest wind pattern while Pillar Point in San Mateo County shows a northwest wind pattern. On the east side of the mountains winds are generally from the west, although wind patterns in this area are often influenced greatly by local topographic features.

Air pollution potential is highest along the southeastern portion of the peninsula. This is the area most protected from the high winds and fog of the marine layer. Pollutant transport from upwind sites is common. In the southeastern portion of the peninsula, air pollutant emissions are relatively high due to motor vehicle traffic as well as stationary sources. At the northern end of the peninsula in San Francisco, pollutant emissions are high, especially from motor vehicle congestion. Localized pollutants, such as CO, can build up in "urban canyons." Winds are generally fast enough to carry the pollutants away before they can accumulate (BAAQMD 2017a).

Regional Attainment Status

Local monitoring data are used to designate areas as nonattainment, maintenance, attainment, or unclassified areas for ambient air quality standards. The four designations are defined below. Table 3.1-3 summarizes the attainment status of San Mateo County.

- **Nonattainment.** Assigned to areas where monitored pollutant concentrations consistently violate the standard in question.
- **Maintenance.** Assigned to areas where monitored pollutant concentrations exceeded the standard in question in the past but are no longer in violation of that standard.
- **Attainment.** Assigned to areas where pollutant concentrations meet the standard in question over a designated period of time.
- **Unclassified.** Assigned to areas where data are insufficient to determine whether a pollutant is violating the standard in question.

Table 3.1-3. Federal and State Attainment Status for San Mateo County Portion of the San Francisco Bay Area Air Basin

Criteria Pollutant	Federal Designation	State Designation
Ozone (8-hour)	Marginal Nonattainment	Nonattainment
Carbon monoxide (CO)	Attainment	Attainment
Particulate matter (PM_{10})	Unclassified	Nonattainment
Fine particulate matter ($PM_{2.5}$)	Moderate Nonattainment (2006)	Nonattainment
Nitrogen dioxide (NO_2)	Attainment	Attainment
Sulfur dioxide (SO_2)	Attainment	Attainment
Lead	Attainment	Attainment
Sulfates	(No Federal Standard)	Attainment
Hydrogen sulfide	(No Federal Standard)	Unclassified
Visibility-reducing particles	(No Federal Standard)	Unclassified

Sources: CARB 2022; EPA 2024d.

Project Site

Existing Air Quality Conditions

CARB and EPA maintain ambient air quality monitoring stations within California. There are no monitoring stations in the City of San Bruno. The air quality monitoring station closest to the project site is the Arkansas Street monitoring station in the City of San Francisco, which monitors criteria air pollutants. The air quality trends from this station are used to represent ambient air quality in the project area. Ambient air quality in the project area from 2021 to 2023 (the most recent available period) is shown in Table 3.1-4. The pollutants monitored at the Arkansas Street station are ozone, CO, NO_2, PM_{10}, and $PM_{2.5}$. Monitoring data for lead and SO_2 are not provided, as the Arkansas Street station does not monitor these pollutants. Moreover, the Air District has not adopted lead and SO_2 thresholds because these pollutants are not emitted in appreciable quantities for most projects, and the SFBAAB is in attainment for these pollutants.

Table 3.1-4. Ambient Air Quality Data for the Project Area (2021–2023)

Pollutant Standards	2021	2022	2023
Ozone at San Francisco-Arkansas Station			
Maximum 1-hour concentration (ppm)	0.074	0.070	0.057
Maximum 8-hour concentration (ppm)	0.054	0.060	0.046
Fourth highest 8-hour concentration (ppm)	0.051	0.044	0.041
Number of days standard exceeded			
CAAQS 1-hour standard (> 0.09 ppm)	0	0	0
CAAQS 8-hour standard (> 0.070 ppm)	0	0	0
NAAQS 8-hour standard (> 0.070 ppm)	0	0	0
Carbon Monoxide (CO) at San Francisco-Arkansas Station			
Maximum 8-hour concentration (ppm)	0.9	1	1.9
Maximum 1-hour concentration (ppm)	1.2	1.5	4.4
Number of days standard exceeded			

Pollutant Standards	2021	2022	2023
NAAQS 8-hour standard (> 9 ppm)	0	0	0
CAAQS 8-hour standard (> 9.0 ppm)	0	0	0
NAAQS 1-hour standard (> 35 ppm)	0	0	0
CAAQS 1-hour standard (> 20 ppm)	0	0	0
Nitrogen Dioxide (NO_2) from San Francisco-Arkansas Station			
Maximum state 1-hour concentration (ppm)	0.049	0.046	0.043
Annual average concentration (ppm)	0.007	0.008	0.007
Number of days standard exceeded			
CAAQS 1-hour standard (0.18 ppm)	0	0	0
NAAQS 1-hour standard (0.100 ppm)	0	0	0
Particulate Matter (PM_{10}) at San Francisco-Arkansas Station			
Maximum state 24-hour concentration (mg/m^3)	33.0	36.0	44.9
Maximum national 24-hour concentration (mg/m^3)	32.2	34.2	43.8
National annual average concentration	8.2	7.7	7.4
Measured number of days standard exceeded			
CAAQS 24-hour standard (50 $\mu g/m^3$)	0	0	0
NAAQS 24-hour standard (150 $\mu g/m^3$)	0	0	0
Particulate Matter ($PM_{2.5}$) at San Francisco-Arkansas Station			
Maximum state 24-hour concentration (mg/m^3)	22.4	29.0	16.7
Maximum national 24-hour concentration (mg/m^3)	22.4	29.0	16.7
National annual average concentration	7.1	6.7	No data
Measured number of days standard exceeded			
NAAQS 24-hour standard (> 35 $\mu g/m^3$)	0	0	0

Sources: CARB 2024c; EPA 2024e.

NAAQS = National Ambient Air Quality Standard; CAAQS = California Ambient Air Quality Standard; ppm = parts per million; $\mu g/m^3$ = micrograms per cubic meter

An exceedance is not necessarily a violation.

State statistics are based on local conditions data; state statistics are based on California-approved samplers.

National statistics are based on standard conditions data. In addition, national statistics are based on samplers, using federal reference or equivalent methods.

State criteria for ensuring data are adequate for calculating valid annual averages are more stringent than national criteria.

Existing Toxic Air Contaminant Sources and Health Risks

The Air District maintains an inventory of health risks associated with all permitted stationary sources within the SFBAAB, which is available online (BAAQMD 2024b). Within 1,000 feet of the project site there are nine permitted facilities that have associated background health risks. Detailed information on this facility is included in Appendix 3.1-1. Aside from stationary sources, emissions of TACs around the project site are also generated from mobile sources and railways. The Air District considers roadways with an average daily traffic level of more than 10,000 to be "high-volume roadways" and recommends they be included in the analysis of health risks.

Environmental Burdens

OEHHA maintains the California Communities Environmental Health Screening Tool (CalEnviroScreen), which provides relative rankings of census tracts based on 21 environmental, health, demographic, and socioeconomic indicators (e.g., ozone concentrations, groundwater threats, education levels). Ranking scores are provided for each indicator, which are also combined to provide an overall ranking score for the census tract. The scores are not a measure of health risk; rather, they reflect the relative pollution burden and vulnerabilities in one census tract compared to other census tracts in the state. Scores are given on a scale of 0 to 100, with larger numbers representing areas with relatively high existing pollution burdens and population sensitivities.

Disadvantaged communities are defined as the census tracts ranking in the top 25th percentile for environmental burdens and socioeconomic conditions (i.e., CalEnviroScreen score of 75 or higher). Low-income communities are defined as the census tracts that are either at or below 80 percent of the statewide median income, or at or below the threshold designated as low-income by the California Department of Housing and Community Development's state income limits.

The project site is located within census tract 6081604102, which has a CalEnviroScreen percentile score of 53. This score indicates that the census tract experiences relatively minor pollution and secondary effects than the rest of the state (OEHHA 2023). As the census tract has a CalEnviroScreen percentile score lower than 70 percent, it is not considered an overburdened community per Air District guidance (BAAQMD 2023).

Sensitive Receptors

Sensitive land uses are generally considered to include those land uses where exposure to pollutants could result in health-related risks to sensitive individuals, including children and the elderly. Per the Air District,

> …sensitive receptors include children, the elderly, offsite workers, students, and those with preexisting medical conditions. They are typically found in residences, schools, parks and playgrounds, daycare centers, nursing homes, and medical facilities, but some receptors are overlooked because they are found in an unlikely location…encampments for the unhoused, warehouses with indoor sports facilities for children and youth, privately operated indoor playgrounds for young children, and privately operated youth-serving facilities (BAAQMD 2023).

Existing sensitive receptors near the project site include the residences southeast of Forest Lane, located as close as approximately 300 feet from the project site, and the residences east of Huntington Avenue, located as close as approximately 150 feet away. There are also offsite workers at commercial buildings surrounding the project site, including those southwest of El Camino Real and northwest of Sneath Lane, located as close as approximately 100 feet from the project site. Herman Park, Centennial Way Park, and Forest Lane Park are located within 1,000 feet of the project site. There are no schools within 1,000 feet of the project site. The project would also site new sensitive receptors, including future residents and workers housed or employed at the proposed uses, who could be exposed to pollutants from ongoing construction and operational sources of TACs and $PM_{2.5}$.

3.1.3 Environmental Impact Analysis

This section describes the environmental impacts of the project on air quality. It describes the thresholds used to determine whether an impact would be significant and methods used to evaluate the impacts. Measures to mitigate significant impacts are provided, where appropriate.

3.1.3.1 Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, the project would have the potential to have a significant effect on air quality if it would result in any of the following conditions.

a. Conflict with or obstruct implementation of the applicable air quality plan?

b. 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?

c. Expose sensitive receptors to substantial pollutant concentrations?

d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Local Air District Thresholds

Regional Thresholds for Air Basin Attainment of State and Federal Ambient Air Quality Standards

This analysis evaluates the impacts of regional emissions generated by the project using a two-tiered approach that considers guidance recommended by the Air District in the agency's CEQA Air Quality Guidelines (BAAQMD 2023). First, this analysis considers whether the project would conflict with the most recent air quality plan (BAAQMD 2017b). Specifically, the impact analysis evaluates whether the project would support the primary goals of the 2017 Clean Air Plan, including applicable control measures, and whether it would disrupt or hinder implementation of any control measures. Secondly, calculated regional criteria pollutant emissions are compared with the Air District's project-level thresholds (BAAQMD 2023). The Air District's thresholds, as summarized in Table 3.1-5, are recommended by the agency to evaluate the significance of a project's regional criteria pollutant emissions. According to the Air District, projects with emissions in excess of the project-level thresholds, shown in Table 3.1-5, would be expected to have a significant cumulative impact on regional air quality because an exceedance of the thresholds is anticipated to contribute to NAAQS and CAAQS violations.

Significance thresholds established by an air district are used to manage total regional and local emissions within an air basin, based on the air basin's attainment status for criteria air pollutants. The project-level emissions thresholds, shown in Table 3.1-5, were established for individual development projects that could contribute to regional and local emissions and adversely affect or delay the air basin's projected attainment target goals for nonattainment criteria air pollutants.

Table 3.1-5. Bay Area Air District Project-Level Regional Criteria Pollutant Emissions Thresholds

Analysis	Thresholds
Regional criteria pollutants (Construction)	• Reactive organic gases (ROGs): 54 pounds/day • Nitrogen oxides (NO_X): 54 pounds/day • Particulate matter (PM_{10}): 82 pounds/day (exhaust only); compliance with best management practices (fugitive dust) • Fine particulate matter ($PM_{2.5}$): 54 pounds/day (exhaust only); compliance with best management practices (fugitive dust)
Regional criteria pollutants (Operations)	• Reactive organic gases (ROGs): Same as construction • Nitrogen oxides (NO_X): Same as construction • Particulate matter (PM_{10}): 82 pounds/day • Fine particulate matter ($PM_{2.5}$): 54 pounds/day

Source: BAAQMD 2023.

Due to the conservative nature of the significance thresholds and the basin-wide context of individual development project emissions, there is no direct correlation between a single project and localized air quality–related health effects. One individual project that generates emissions that exceed a threshold does not necessarily result in adverse health effects for residents in the vicinity. This condition is especially true when the criteria air pollutants that exceed thresholds are those with regional effects, such as ozone precursors (e.g., NO_X and ROGs). Furthermore, by its very nature, air pollution is largely a cumulative impact. No single project is large enough by itself to result in nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project's contribution to the cumulative impact is considerable, then the project's impact on air quality is considered significant. In developing thresholds of significance for air pollutants, the air districts have considered the emissions levels at which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts on the region's existing air quality conditions.

Health-Based Thresholds for Project-Generated Pollutants of Human Health Concern

All criteria pollutants generated by the project are associated with some form of health risk (e.g., asthma, lower respiratory problems). Criteria pollutants can be classified as either regional pollutants or localized pollutants. Regional pollutants can be transported over long distances and affect ambient air quality far from the emissions source. Localized pollutants affect ambient air quality near the emissions source. Ozone is considered a regional criteria pollutant, whereas CO, NO_2, SO_2, and lead are localized pollutants. PM can be both a local and a regional pollutant, depending on its composition. The primary criteria pollutants of concern generated by the project would be ozone precursors (i.e., ROGs and NO_X), CO, and PM, including DPM.

The sections that follow discuss thresholds and analysis considerations for regional and local project-generated criteria pollutants with respect to their human health implications.

Regional Project-Generated Criteria Pollutants (Ozone Precursors and Regional Particulate Matter)

The Air District's CEQA Guidelines note that, to comply with the Friant Ranch decision,[3]

> lead agencies need to sufficiently explain the nature and magnitude of significant impacts identified by criteria air pollutant and precursor air quality analyses such that readers can meaningfully understand them. Moreover, lead agencies must make a reasonable effort to connect a project's emissions, where significant, to foreseeable health impacts or provide evidence as to why such an analysis is not scientifically possible (BAAQMD 2023).

As discussed previously, air districts develop region-specific CEQA thresholds of significance in consideration of existing air quality concentrations as well as attainment or nonattainment designations under the NAAQS and CAAQS. The NAAQS and CAAQS are informed by a wide range of scientific evidence that demonstrates that there are known safe concentrations of criteria pollutants. Although recognizing that air quality is a cumulative problem, air districts typically consider projects that generate criteria pollutant and ozone precursor emissions that are below the thresholds to be minor in nature. Such projects would not adversely affect air quality or exceed the NAAQS or CAAQS. For projects generating emissions that exceed the mass emissions thresholds, the Air District recommends tying the project emissions to potential negative health consequences if scientifically feasible.

Localized Project-Generated Criteria Pollutant Emissions (Carbon Monoxide and Particulate Matter) and Air Toxics (Diesel Particulate Matter and Asbestos)

Localized pollutants generated by a project can be deposited near the emissions source, potentially affecting the nearby population. Although these pollutants dissipate with distance, emissions from individual projects can result in direct and material health impacts on adjacent sensitive receptors. The localized pollutants of concern that would be generated by the project are CO, PM, DPM, and asbestos. The applicable thresholds for each pollutant are described below.

Carbon Monoxide

Heavy traffic congestion can contribute to high levels of CO. Individuals exposed to such "hot spots" may have a greater likelihood of developing adverse health effects. The Air District has adopted screening criteria that provide a conservative indication of whether project-generated traffic would cause a potential CO hot spot. If the screening criteria are not met, a quantitative analysis, through site-specific dispersion modeling of project-related CO concentrations, would not be necessary. A project would not cause localized violations of the CAAQS for CO if the Air District's CO screening criteria, summarized below, are met (BAAQMD 2023).

- The project is consistent with an applicable congestion management program established by the county congestion management agency for designated roads or highways, the regional transportation plan, and local congestion management agency plans.
- Project-generated traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour.

[3] The California Supreme Court's 2018 decision in *Sierra Club v. County of Fresno* (6 Cal.5th 502), also referred to as the Friant Ranch Decision, included review of the long-term regional air quality analysis contained in the EIR for the proposed Community Plan Update and Friant Ranch Specific Plan. The court found that the EIR's air quality analysis was inadequate because it failed to provide enough detail "for the public to translate the bare [criteria pollutant emissions] numbers provided into adverse health impacts or to understand why such a translation is not possible at this time."

- Project-generated traffic 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).

Particulate Matter

The Air District adopted an incremental $PM_{2.5}$ concentration-based significance threshold in which a "substantial" contribution at the project level for an individual source is defined as total (i.e., exhaust and fugitive) $PM_{2.5}$ concentrations exceeding 0.3 $\mu g/m^3$. In addition, the Air District considers projects to have a cumulatively considerable $PM_{2.5}$ impact if sensitive receptors are exposed to $PM_{2.5}$ concentrations from local sources within 1,000 feet, including existing sources, project-related sources, and reasonably foreseeable future sources, that exceed 0.8 $\mu g/m^3$ (BAAQMD 2023). The $PM_{2.5}$ thresholds apply to both new receptors and new sources.

The Air District has not established concentration-based PM_{10} thresholds of significance. Rather, the Air District considers impacts related to fugitive PM_{10} from earthmoving activities to be less than significant with application of the Air District's basic construction measures.

Diesel Particle Matter

DPM has been identified as a TAC. It is particularly concerning because long-term exposure can lead to cancer, birth defects, and damage to the brain and nervous systems. The Air District has adopted incremental cancer and hazard thresholds to evaluate receptor exposure to single sources of DPM emissions. The "substantial" DPM threshold defined by the Air District is exposure of a sensitive receptor to an individual emissions source, resulting in an excess cancer risk level of more than 10 in 1 million or a non-cancer (i.e., chronic or acute) hazard index greater than 1.0 (BAAQMD 2023). The Air District also considers projects to have a cumulatively considerable DPM impact if they contribute to DPM emissions that, when combined with cumulative sources within 1,000 feet of sensitive receptors, result in excess cancer risk levels of more than 100 in 1 million or a hazard index greater than 10.0. The Air District considers projects to have a significant cumulative impact if they worsen an existing health risk impact at a location where the combined exposure to all cumulative sources, including all past, present, and foreseeable future sources, within 1,000 feet (or greater where appropriate) is in excess of cumulative thresholds (BAAQMD 2023).

Asbestos

The Air District's CEQA Guidelines state that projects that have the potential to disturb asbestos (from soil or building material) must comply with all the requirements of CARB's ATCM for Construction, Grading, Quarrying, and Surface Mining Operations and Bay Area Air District Regulation 11, Rule 2: Asbestos Demolition, Renovation and Manufacturing (BAAQMD 2023). As described above under *Regulatory Setting*, CARB's ATCM for Construction, Grading, Quarrying, and Surface Mining Operations requires work practices that minimize asbestos emissions from activities where naturally occurring asbestos is found or is likely to be found. Bay Area Air District Regulation 11, Rule 2, controls emissions of asbestos to the atmosphere during demolition, renovation, and transportation. The rule requires lead agencies and their contractors to notify the Air District of any regulated renovation or demolition activity and provide a description of structures and methods utilized to determine whether asbestos-containing materials are potentially present. In addition, Regulation 11, Rule 2, requires any asbestos-containing material found on a site to be removed prior to demolition or renovation, thereby minimizing the release of airborne asbestos emissions. Thus,

projects that comply with the requirements of CARB's ATCM for Construction, Grading, Quarrying, and Surface Mining Operations and Bay Area Air District Regulation 11, Rule 2 would not have a significant air quality impact with respect to asbestos emissions.

Odors

According to the Air District's CEQA Guidelines, odor impacts could occur if a project proposes a new odor source near existing receptors. For projects proposing new odor-generating facilities (e.g., wastewater treatment plants, landfills, and food manufacturing plants), the Air District recommends that projects identify the location of planned odor sources and include policies to reduce potential odor impacts on existing receptors and provides recommended screening distances for siting new receptors near existing odor sources. The Air District has not adopted a threshold for construction-related odors and considers operational odor impacts to be significant if they result in five confirmed complaints per year averaged over three years.

3.1.3.2 Methodology and Approach

Construction

Construction of the project would generate ROGs, NO_X, PM_{10}, and $PM_{2.5}$ emissions that could result in short-term air quality effects. Emissions would be released in the form of exhaust from off-road equipment; exhaust from employee vehicles, vendor trucks, and haul trucks; fugitive dust from site grading and earthmoving; suspended road dust from vehicle travel; and off-gassing from architectural coatings and paving. Short-term emissions generated by project construction were calculated using the California Emissions Estimator Model (CalEEMod), version 2022.1, as recommended by the Bay Area Air District and other air districts in California (CAPCOA 2022). Modeling was based on project-specific information where available, including demolition and earthwork quantities, building sizes and use types, a construction equipment inventory, construction phase durations, vehicle trip lengths and quantities, and paved area quantities. Default values from CalEEMod, which are generated by the model based on a project's location and land uses, were also used for some parameters. For criteria pollutant emissions from on-road vehicles, CalEEMod uses vehicle emissions factors from CARB's EMFAC2021 model.

The daily emissions generated will vary based on the type and intensity of construction activities occurring simultaneously. Consistent with Air District guidance, average daily emissions have been calculated to assess construction impacts (BAAQMD 2023). Detailed model assumptions, inputs, and output files can be found in Appendix 3.1-1, *Air Quality and Greenhouse Gas Technical Appendix*.

Operation

Project operation would generate emissions of ROGs, NO_X, PM_{10}, and $PM_{2.5}$ that could result in long-term air quality effects. It would generate long-term air pollutant emissions from fugitive gases escaping to the atmosphere from proposed laboratory uses, motor vehicles traveling to and from the project site, operation of landscape maintenance equipment, off-gassing emissions from the use of cleaning supplies and the reapplication of architectural coatings, and the proposed diesel-fueled emergency generators. The project would not result in any direct building energy emissions because the proposed uses would be all-electric and no natural gas infrastructure would be constructed to provide service to the project site. The project is expected to be fully operational by 2034.

Emissions associated with the proposed laboratory uses were quantified external to CalEEMod, based on TAC emissions rates derived from the University of California, Davis Health Risk Assessment (HRA) (Yorke Engineering 2018).[4] These emissions rates, calculated in pounds per hour per square foot, were then multiplied by the proposed laboratory building square footage. This analysis conservatively assumes that laboratory activities would occur approximately 12 hours per day, 5 days per week, 260 days per year.

Emissions from all other sources were calculated using CalEEMod Version 2022.1. Like construction, operational modeling was based on project-specific information where available, including building sizes and use types, trip generation estimates, utility usage data, and stationary equipment data. As with construction, default values from CalEEMod were used for some parameters.

During operations, the largest source of emissions would be motor vehicles traveling to and from the project site. These emissions were estimated using traffic data provided by Fehr & Peers and CalEEMod. The traffic data comprised daily vehicle trip and vehicle miles traveled quantities, which may be conservative given the project's compliance with CalGreen Tier 2 electric vehicle (EV) parking and the anticipated increase in EVs in the market. The traffic data were entered into the mobile-source module of CalEEMod to estimate GHG emissions resulting from project-related vehicle trips.

Area-source emissions would result from the reapplication of architectural coatings as part of ongoing building maintenance, the use of consumer products, and the use of landscaping equipment. CalEEMod default values were used to estimate the project's emissions from these area sources.

Stationary-source emissions would result from the operation of 19 and 17 diesel-powered emergency generators under Scenario A and Scenario B, respectively. Each generator is anticipated to operate up to 30 hours per year, with approximately 8 hours for testing and maintenance and 22 hours for emergency use.[5] Generators equal to or greater than 1,000 horsepower are subject to Bay Area Air District permit conditions requiring the use of Tier 4 certified engines (BAAQMD 2024a). As a result, Tier 4 emissions factors were applied for generators equal to or greater than 1,000 horsepower, and CalEEMod default emissions factors were used for those under 1,000 horsepower, consistent with Bay Area Air District, CARB, and EPA guidance (BAAQMD 2009; CARB 2011; EPA 2006, 2023).

The project would remove existing uses on the site that currently generate emissions. As such, the net effect of the project would be the difference between existing uses and project uses. Emissions generated by the existing uses were also estimated using CalEEMod, based on project-specific information such as building sizes and use types and trip generation data from Fehr & Peers. Default values from CalEEMod, which are generated based on the project's location and land use type, were also used. There are currently two emergency generators on the site, including a 500-kilowatt unit and a 45-kilowatt unit, that would be decommissioned as part of the project. These generators were not included in the analysis of existing emissions due to a lack of detailed operational data at the

[4] The modeling conservatively assumes that 100 percent of these TAC emissions would also be ROG emissions.

[5] The 30-hour annual usage estimate is based on data provided by the applicant. To inform this assumption, the applicant surveyed emergency generator usage, both planned (testing) and unplanned (emergency), across approximately 30 comparable life science and technology office projects in the region over a three-year period (Hofstetter pers. comm.). While most facilities indicated minimal emergency use, with 10 hours per year representing the upper range, this analysis conservatively assumes 22 hours of emergency operation and 8 hours of scheduled testing annually.

time of modeling. Because the existing generator emissions were not quantified for the existing scenario, the project's net emissions estimate is conservative, and the actual net emissions from the project are likely to be lower than presented in this analysis due to the removal of the existing generators.

Net project emissions are calculated by subtracting existing year 2025 operational criteria pollutant emissions from full buildout year 2034 conditions. Detailed model assumptions, inputs, and output files can be found in Appendix 3.1-1, *Air Quality and Greenhouse Gas Technical Appendix*.

Health Risk Analysis

An HRA was prepared to quantify the levels of exposure from emissions of DPM, ROGs, and $PM_{2.5}$ at existing offsite sensitive receptors and future onsite receptors, for both project construction and operation. The HRA methods are described here, and all HRA modeling assumptions and results can be found in Appendix 3.1-1, *Air Quality and Greenhouse Gas Technical Appendix*.

Diesel Particulate Matter, Reactive Organic Gases, and Particulate Matter$_{2.5}$

The project would generate DPM, ROGs, and $PM_{2.5}$ emissions from construction and operational activities. Because the project would introduce TAC emissions in an area near existing sensitive receptors, a construction and operational HRA was conducted. The HRA used EPA's most recent air dispersion model, Atmospheric Dispersion Modeling System (AERMOD) (version 24142); cancer and chronic risk assessment values for DPM provided by OEHHA; and assumptions for model inputs recommended in the Air District's CEQA Air Quality Guidelines: Appendix E, *Recommended Methods for Screening and Modeling Local Risks and Hazards* (BAAQMD 2023). The HRA also applies the most recent guidance and calculation methods from OEHHA's *Air Toxics Hot Spots Program Guidance Manual for the Preparation of Risk Assessments* (OEHHA 2015). An HRA consists of three parts—an emissions inventory, air dispersion modeling, and risk calculations—and a description of each of these parts as applied to the project is discussed here. Refer to Appendix 3.1-1, *Air Quality and Greenhouse Gas Technical Appendix*, for detailed model assumptions, output files, and risk calculations.

Emissions Inventory

The construction emissions inventory includes PM_{10} exhaust emissions from off-road equipment, onsite trucks, and on-road trucks and $PM_{2.5}$ emissions from onsite soil movement and the travel of trucks and construction worker vehicles on roadways. PM_{10} exhaust emissions are assumed to be representative of DPM in this analysis, per Air District guidance.

The operational emissions inventory comprises emissions from vehicles, including PM_{10} exhaust emissions and $PM_{2.5}$ exhaust, brake wear, tire wear, and re-entrained fugitive dust emissions. The inventory also includes PM_{10} and $PM_{2.5}$ exhaust emissions from maintenance, testing, and emergency use of the proposed diesel-fueled generators. The inventory and analysis also includes the potential acute risks from the several ROG-based TACs that would be fugitively emitted from the laboratory uses. The emissions rates for the sources of PM_{10}, $PM_{2.5}$, and ROGs included in the HRA were quantified using CalEEMod and other methodologies described previously, and the specific emissions rate values used in the analysis are provided in Appendix 3.1-1, *Air Quality and Greenhouse Gas Technical Appendix*.

Air Dispersion Modeling

The HRA used EPA's AERMOD model, version 24142, to model DPM concentrations and annual average $PM_{2.5}$ concentrations at nearby receptors. Modeling inputs, including emissions rates of pollutants emitted per second and source characteristics (e.g., release height, stack diameter, plume width) were based on guidance provided by OEHHA, Bay Area Air District, and the South Coast Air Quality Management District (SCAQMD).[6] The San Francisco International Airport monitoring station (KSFO) is the closest station to project site; thus, meteorological data from KSFO for 2013 to 2017 were used to model pollutant concentrations at sensitive-receptor locations (BAAQMD 2022).[7]

Emissions from off-road equipment and onsite trucks during project construction were characterized as polygon area sources to outline the footprint of the areas in which activities would occur. A release height[8] of 5.0 meters represented exhaust emissions from off-road equipment and onsite trucks (SCAQMD 2008). A release height of 0 meters represented fugitive dust $PM_{2.5}$ emissions from off-road equipment and onsite and on-road vehicles. On-road travel emissions from construction-related vehicles were characterized as line-volume sources[9] with a release height of 3.4 meters (BAAQMD 2023).

To account for plume rise associated with mechanically generated air turbulence from emissions sources for the AERMOD run, the initial vertical dimension for the line-volume exhaust sources was set as 3.16 meters. The initial vertical dimension for the area exhaust sources was set as 4.65 meters. Plume rise is the height that pollutants rise above a release height. For exhaust, plume rise occurs because of the temperature of the exhaust gas. Exhaust gas temperatures can be high, which causes the plume to rise. For fugitive dust, plume rise accounts for the mechanical entrainment of dust in the wheels of equipment and trucks and was set as 0.9 meter.

Sources of operational emissions, including the proposed diesel-fueled generators and laboratory uses, were modeled as point sources consistent with their location on the site and Air District-recommended input parameters and from the University of California, Davis HRA (Yorke Engineering 2018). On-road travel emissions from vehicles during operations were characterized using the same parameters as construction-related vehicles described above. Refer to Appendix 3.1-1, *Air Quality and Greenhouse Gas Technical Appendix*, for detailed source parameters used in the construction and operational HRA.

Modeling Domain and Receptor Network

Construction activities were modeled assuming construction would typically occur Monday through Friday between 7:00 a.m. and 3:00 p.m. (8 hours per day, 5 days per week). The urban dispersion option was used because of the site's characteristics and because surrounding areas are developed with buildings and paved surfaces that can influence how pollutants are dispersed in the area. Receptor markers were placed in the modeling domain to represent the actual locations of all sensitive-receptor locations within approximately 1,000 feet of the project site using a 20-by 20-

[6] Certain information necessary for modeling, such as source parameters (e.g., source heights), is not available from the Air District but is provided by SCAQMD. These parameters do not depend on a project's geographic location and are appropriate to use in areas outside of SCAQMD's jurisdiction.

[7] The Air District maintains processed meteorological data for use in air quality dispersion models for 2013 through 2017. Additional years can be obtained by submitting a public records request. This analysis uses 2013–2017 data, which remain representative of current conditions.

[8] The release height represents the height above the ground at which pollutants are emitted.

[9] Line volume sources represent a series of individual volumes sources.

meter receptor grid. Receptors were given a height of 1.5 meters to represent the average human breathing zone (BAAQMD 2023).

Risk Calculations

The risk calculations incorporate OEHHA's age sensitivity factors, which account for increased sensitivity to carcinogens during early-in-life exposure. The approach for estimating cancer risk from long-term inhalation, including exposure to carcinogens, requires calculating a range of potential doses and multiplying by cancer potency factors in units corresponding to the inverse dose to obtain a range of cancer risks. For cancer risk, the risk for each age group is calculated using the appropriate daily breathing rates, age sensitivity factors, and exposure durations. The cancer risks calculated for individual age groups are summed to estimate the cancer risk for each receptor. Chronic cancer and hazard risks were calculated using values from OEHHA's 2015 HRA guidance as well as the Air District's Appendix E, *Recommended Methods for Screening and Modeling Local Risks and Hazards* (OEHHA 2015; BAAQMD 2023).

Emissions and exposure to sensitive populations would vary across the construction period. Therefore, multiple exposure scenarios were evaluated to capture the period of maximum impact on each sensitive population and location. The maximum impact from each of these scenarios was reported.

The proposed construction phases are described in Section 2.6.16, *Project Construction and Phasing*, in Chapter 2, *Project Description*. Health impacts were evaluated in within the following six exposure scenarios.

- **Scenario 1.** Offsite receptors' exposure beginning at the start of Make Ready Phase construction.
- **Scenario 2.** Offsite receptors' exposure beginning at the start of Phase 1 construction.
- **Scenario 3.** Offsite receptors' exposure beginning at the start of Phase 2 construction.
- **Scenario 4.** Offsite and onsite Phase 1 and Phase 2 receptors' exposure beginning at the start of Phase 3 construction.
- **Scenario 5.** Offsite and onsite Phase 1, Phase 2, and Phase 3 receptors' exposure beginning at the start of Phase 4 construction.
- **Scenario 6.** Offsite and onsite Phase 1, Phase 2, Phase3, and Phase 4 receptors' exposure to Project Buildout operations.

Refer to Appendix 3.1-1, *Air Quality and Greenhouse Gas Technical Appendix*, for the risk calculations and additional assumptions.

3.1.3.3 Buildout Scenario Evaluated

As discussed in Section 3.0.3.1, *Buildout Scenarios*, for each resource area studied, the EIR evaluates the scenario with the greatest potential to result in a significant impact. In some cases, impacts would be the same regardless of the buildout scenario, so the analysis does not evaluate a specific buildout scenario. This approach ensures that the EIR identifies the maximum potential impacts of the project based on reasonably foreseeable development outcomes. Table 3.1-6 summarizes the approach used for each impact analysis related to air quality.

Table 3.1-6. Impact Analysis Approach for Air Quality

Impact Criteria	Scenario A	Scenario B	EIR Approach
Impact AQ-1: Conflict with or obstruct implementation of the applicable air quality plan?	Scenario A includes 1,000 dwelling units.	Scenario B includes 1,500 dwelling units.	Same for both scenarios. It is probable that each scenario would support 2017 Clean Air Plan goals as transit-oriented development and that the same 2017 Clean Air Plan control measures would be implemented. Therefore, the analysis approach is not based on one scenario or the other, and accounts for any future development that could occur under the project.
Impact AQ-2: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is a nonattainment area for an applicable federal or state ambient air quality standard?	Scenario A has more life-science laboratory and office uses and more amenity uses.	Scenario B has more residential and hotel uses.	Scenario A. Construction emissions are expected to be similar between Scenario A and Scenario B. Both scenarios would involve equally intensive construction activities, resulting in comparable criteria air pollutant emissions. During the operational phase, Scenario B would generate greater criteria pollutant emissions from on-road vehicle trips, while Scenario A would produce higher emissions from laboratory uses and stationary sources. Scenario A would generate higher emissions from overlapping construction and operation. This is because, under Scenario A, a greater number of phases would be operational while still coinciding with ongoing construction activities compared to Scenario B. As a result, detailed operational criteria air pollutant emissions for Scenario A are provided below, with emissions for both scenarios available in Appendix 3.1-1, *Air Quality and Greenhouse Gas Technical Appendix*.
Impact AQ-3: Expose sensitive receptors to substantial pollutant concentrations?	Residences are clustered on the east side of the project site; Scenario A contains retail and office buildings, along with residential buildings located in the northeast area of the site.	Residences are clustered on the east side of the project site; Scenario B contains retail and office buildings, along with a hotel and residential buildings located in the northeast and east areas of the site.	Both scenarios. Construction emissions are expected to be similar between Scenario A and Scenario B. Both scenarios would involve similarly intensive construction activities, resulting in comparable TAC and $PM_{2.5}$ emissions. During the operational phase, Scenario B would generate greater TAC and $PM_{2.5}$ emissions from on-road vehicle trips, while Scenario A would produce higher TAC and $PM_{2.5}$ emissions from laboratory uses and

Impact Criteria	Scenario A	Scenario B	EIR Approach
			stationary sources. Conservatively, on-road emissions from vehicle trips were used from Scenario B and emissions from laboratory and stationary sources were used from Scenario A. As a result, detailed operational health risks for Scenario A and B are provided below and in Appendix 3.1-1, *Air Quality and Greenhouse Gas Technical Appendix*.
Impact AQ-4: Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	Scenario A has more life-science laboratory and office uses and more amenity uses. The life-science laboratory use is close to residences east of the project site.	Scenario B has more residential and hotel uses.	Scenario A. The most conservative scenario would be Scenario A, because of the potential odors associated with the life-science laboratory use close to residential receptors east of the project site.

3.1.3.4 Impacts and Mitigation Measures

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

As described in Section 3.1.2.1, *Regulatory Setting*, the current air quality attainment plan for the SFBAAB is Bay Area Air District's 2017 Clean Air Plan, which defines control strategies to reduce emissions and ambient concentrations of air pollutants; safeguards public health by reducing exposure to air pollutants that pose the greatest health risk, with an emphasis on protecting the communities most heavily affected by air pollution; and reduces GHG emissions to protect the climate (BAAQMD 2017b). According to the Air District's CEQA Guidelines, the determination of 2017 Clean Air Plan consistency should consider the following for project-level analyses (BAAQMD 2023).

- Does the project support the primary goals of the 2017 Clean Air Plan?
- Does the project include all applicable control measures from the 2017 Clean Air Plan?
- Does the project disrupt or hinder implementation of any 2017 Clean Air Plan control measures?

Each of these questions is addressed below for the project.

Support of 2017 Clean Air Plan Goals

The primary goals of the 2017 Clean Air Plan are to reduce emissions and decrease concentrations of harmful pollutants, safeguard public health by reducing exposure to air pollutants that pose the greatest health risk, and reduce GHG emissions and protect the climate.

As described in Chapter 2, *Project Description*, the project would minimize air pollutant and GHG emissions by incorporating onsite renewables, including photovoltaic systems on parking garages and other large roof surfaces, and exceeding California's energy efficiency standards (Title 24, Part VI of the California Energy Code). The project would be all-electric, leading to a reduction in emissions from natural gas use compared to the existing uses, with lighting and heating, ventilation, and air conditioning (HVAC) systems designed to maximize energy efficiency. Furthermore, the project would adhere to the voluntary CALGreen Tier 2 EV charging requirements for the proposed residential and nonresidential parking spaces. The project is targeting a 40 percent reduction in indoor water use through the installation of efficient flow and flush building fixtures, smart metering, leak detection systems and water reuse for low-maintenance, drought tolerant landscaping, and implementation of other water efficiency strategies throughout the site. These water-saving strategies would reduce energy use and GHG emissions associated with water conveyance. The project would also adopt waste minimization programs, including recycling, composting, and reusable product initiatives. These programs would be implemented throughout the site in compliance with Recology San Bruno standards and City of San Bruno Disposable Food Service Ware Ordinance, serving to reduce indirect emissions from waste generation. By incorporating conservation and efficiency design features, the project would meet the United States Green Building Council's Leadership in Energy and Environmental Design (LEED) LEED Gold certification standards for life-science buildings.

Based on the above analysis, the project would support the primary goals of the 2017 Clean Air Plan.

Include Applicable 2017 Clean Air Plan Control Measures

Control strategies in the 2017 Clean Air Plan include measures in the following categories: stationary-source control measures, transportation control measures, energy control measures, building control measures, agriculture control measures, natural and working lands control measures, waste management control measures, and water control measures. The project's consistency with each of these strategies is discussed below.

Stationary-Source Control Measures

The stationary-source control measures, which are designed to reduce emissions from stationary sources such as metal melting facilities, cement kilns, refineries, and glass furnaces, are incorporated into rules adopted by the Air District and then enforced by Air District permit and inspection programs.

The project would include diesel-powered emergency generators, which are stationary sources that would require a permit to operate from the Air District. Specifically, Scenario A and Scenario B would include 19 and 17 diesel-powered emergency generators, respectively. As part of the permit review process, operation of the emergency generators would be required to comply with Air District permitting requirements, which incorporate stationary-source control measures from the 2017 Clean Air Plan; therefore, the project would be consistent with the stationary-source control measures of the 2017 Clean Air Plan through compliance with the current regulatory process.

Transportation Control Measures

As part of the 2017 Clean Air Plan, the Air District identifies transportation control measures to decrease emissions of criteria pollutants, TACs, and GHGs by reducing demand for motor vehicle travel, promoting efficient vehicles and transit service, decarbonizing transportation fuels, and electrifying motor vehicles and equipment. The 2017 Clean Air Plan also recognizes that community design dictates individual travel mode and that a key long-term control strategy to reduce emissions of criteria pollutants, TACs, and GHGs from motor vehicles is to channel future Bay Area growth into vibrant urban communities where goods and services are close at hand and people have a range of viable transportation options.

The project would support efforts to decarbonize transportation fuels by exceeding the mandatory CALGreen EV charging requirements for new nonresidential and residential development. The project would also support efforts to reduce emissions from motor vehicle travel by siting new residential dwelling units in San Mateo County, enabling new residents to live closer to where they work and promoting a more balanced distribution of jobs and housing across the region. Moreover, the project site is adjacent to an existing Bay Area Rapid Transit (BART) station and within 0.5 mile of a Caltrain station, which will encourage the use of transit as an alternate method of transportation. Finally, the project would include several TDM measures, such as amenities for pedestrians and bicyclists, reduced parking, and active transportation subsidies, in accordance with the City/County Association of Governments of San Mateo County (C/CAG) Congestion Management Program.

Energy Control Measures

The 2017 Clean Air Plan also includes energy control measures, which are designed to reduce emissions of criteria air pollutants, TACs, and GHGs by decreasing the amount of electricity consumed in the Bay Area, as well as the carbon intensity of electricity used by switching to less GHG-intensive fuel sources for electricity generation. Because these measures apply to electrical utility providers and local government agencies and not individual projects, the energy control measures of the 2017 Clean Air Plan are not applicable to the project.

While the energy control measures are not directly applicable to the project, the project would nonetheless support efforts to decrease electricity consumption by exceeding California's energy efficiency standards (Title 24, Part VI of the California Energy Code). Additionally, the project is designed to leverage efficient building systems with features like heat recovery, variable exhaust or wind responsive exhaust, reductions in lighting power density, air change setbacks, and high-performance envelopes. Finally, the project would support efforts to utilize less GHG-intensive fuel sources for electricity generation by developing all-electric buildings and incorporating onsite renewables, including photovoltaic systems on parking garages and other large roof surfaces.

Building Control Measures

The Air District has authority to regulate emissions from certain sources in buildings, such as boilers and water heaters, but has limited authority to regulate buildings themselves. Therefore, the strategies in the control measures for this sector focus on working with local governments that do have authority over local building codes to facilitate adoption of best management practices and policies related to GHGs. Therefore, the building control measures of the 2017 Clean Air Plan are not applicable to the project.

While the building control measures are not applicable to the project, the project would nonetheless be built to achieve an LEED Gold rating, which requires an efficient and environmentally sustainable building design.

Agriculture Control Measures

The agriculture control measures are designed to reduce primarily emissions of methane. Because the project would not include any agricultural activities, the agriculture control measures of the 2017 Clean Air Plan are not applicable to the project.

Natural and Working Lands Control Measures

The natural and working lands control measures focus on increasing carbon sequestration on rangelands and wetlands. They also encourage local governments to adopt ordinances that promote urban tree planting. Because the project would not directly disturb rangelands or wetlands, the natural and working lands control measures of the 2017 Clean Air Plan are not applicable to the project. Although the natural and working lands control measures do not apply to the project, the project would still support urban tree planting efforts by planting approximately 475 trees in 24-inch boxes or larger.

Waste Management Control Measures

The waste management control measures focus on reducing or capturing methane emissions from landfills and composting facilities, diverting organic materials away from landfills, and increasing waste diversion rates through efforts to reduce, reuse, and recycle.

The project would adopt waste minimization programs, including recycling, composting, and reusable product initiatives. These programs would be implemented throughout the site in compliance with Recology San Bruno standards and City of San Bruno Disposable Food Service Ware Ordinance, serving to reduce emissions from waste generation.

Water Control Measures

The water control measures focus on reducing emissions of criteria pollutants, TACs, and GHGs by encouraging water conservation, limiting GHG emissions from publicly owned treatment works, and promoting the use of biogas recovery systems. Because these measures apply to publicly owned treatment works and local government agencies, and not individual projects, the water control measures do not apply to the project.

The project would include several strategies to reduce indoor water use, including efficient flow and flush fixtures, smart metering, and leak detection, resulting in a 40 percent reduction in indoor water use. The project would also reuse non-potable water to meet water demand for landscaping uses.

Disrupt or Hinder Implementation of 2017 Clean Air Plan Control Measures

As discussed previously, the project would incorporate a variety of sustainable design features to reduce emissions associated with transportation, energy, buildings, waste generation, and water usage. As a result, the project would not disrupt, delay, or otherwise hinder implementation of any applicable control measures from the 2017 Clean Air Plan. Rather, the project would support and facilitate implementation.

Accordingly, the project would not conflict with or obstruct implementation of the 2017 Clean Air Plan and would have a ***less-than-significant*** impact.

Impact AQ-2: The project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is a nonattainment area for an applicable federal or state ambient air quality standard (Less Than Significant With Mitigation).

According to the Air District's CEQA Guidelines, to meet air quality standards for criteria air pollutant and air precursor impacts, the project must not generate construction or operational emissions in excess of the thresholds shown in Table 3.1-5. The project's construction and operational emissions are evaluated in this section.

Construction

As discussed in Section 3.1.3.2, *Methodology and Approach*, emissions from project construction activities were calculated using CalEEMod and data provided by the applicant. Table 3.1-7 shows the average daily criteria air pollutant emissions resulting from project construction with and without mitigation. Though the estimates provided pertain to Scenario A, emissions for both scenarios can be found in Appendix 3.1-1, *Air Quality and Greenhouse Gas Technical Appendix*, and as detailed in Section 3.1.3.3, *Buildout Scenario Evaluated*.[10] Detailed model assumptions, inputs, and output files can also be found in Appendix 3.1-1.

As shown in Table 3.1-7, average daily unmitigated emissions would exceed the NO_X threshold by about 10 pounds per day during the second year of construction, 2027, but would not exceed the thresholds for any other pollutants. An exceedance would not necessarily occur on every day of construction in 2027; rather, emissions may be below the threshold on some days and above on others. On average, however, emissions in 2027 would be above the threshold. Thus, **Mitigation Measure AQ-2-A** would be implemented to reduce the project NO_X emissions by requiring EPA Tier 4 Final diesel equipment. As shown in Table 3.1-7 for the mitigated scenario, implementation of **Mitigation Measure AQ-2-A** would reduce NO_X emissions below the threshold. Thus, with the incorporation of **Mitigation Measure AQ-2-A**, the project's impact associated with mass emissions of criteria pollutants resulting from construction would be ***less than significant with mitigation***.

The Air District considers fugitive dust impacts to be less than significant when best management practice (BMP) are applied to control dust (BAAQMD 2023). If BMPs are not implemented, dust impacts could be potentially significant. Therefore, BMPs are required to reduce impacts from construction-related fugitive dust emissions. As a result, **Mitigation Measure AQ-2-B** would be incorporated to ensure that the Air District's BMPs are implemented during project construction.

Therefore, the project's impact associated with construction emissions would be ***less than significant with mitigation***.

[10] While the most conservative scenario varies based on the construction year and pollutant, the overall significance level and exceedances remain consistent across both scenarios.

Table 3.1-7. Estimated Average Daily Construction Emissions of Criteria Air Pollutants and Precursors

	Average Daily Emissions (lb/day) [a,b]					
Construction Year	**ROGs**	**NO_X**	**PM_{10} Fugitive Dust**	**PM_{10} Exhaust**	**$PM_{2.5}$ Fugitive Dust**	**$PM_{2.5}$ Exhaust**
Unmitigated Scenario [a]						
2026	1.0	10.1	13.4	0.2	2.7	0.2
2027	2.0	64.0	43.0	0.6	10.5	0.6
2028	24.1	14.6	25.5	0.1	6.3	0.1
2029	45.4	35.3	44.7	0.3	11.1	0.3
2030	26.5	36.8	44.1	0.4	10.9	0.4
2031	26.1	35.6	48.0	0.4	11.8	0.4
2032	27.8	28.5	38.9	0.3	9.6	0.2
2033	15.5	11.6	13.9	0.1	3.4	0.1
Highest Average Daily Emissions	**45.4**	**64.0**	**48.0**	**0.6**	**11.8**	**0.6**
Significance Thresholds	54	54	NA	82	NA	54
Exceeds Threshold?	***No***	***Yes***	**--**	***No***	**--**	***No***
Mitigated Scenario [b]						
2026	1.0	8.7	13.4	0.1	2.7	0.1
2027	1.9	53.3	42.1	0.6	10.1	0.6
2028	24.0	8.0	25.4	0.1	6.3	0.1
2029	45.2	23.7	44.5	0.3	10.9	0.3
2030	26.4	23.7	43.8	0.3	10.8	0.3
2031	25.9	19.9	47.8	0.2	11.7	0.2
2032	27.5	11.9	38.9	0.2	9.6	0.2
2033	15.4	3.6	13.9	0.1	3.4	0.1
Highest Average Daily Emissions	**45.2**	**53.3**	**47.8**	**0.6**	**11.7**	**0.6**
Significance Thresholds	54	54	NA	82	NA	54
Exceeds Threshold?	*No*	*No*	--	*No*	--	*No*

Source: Appendix 3.1-1.

Exceedances are underlined.

lb/day = pounds per day; ROGs = reactive organic gases; NO_X = oxides of nitrogen; PM_{10} = particulate matter with an aerodynamic diameter of 10 microns or less; $PM_{2.5}$ = particulate matter with an aerodynamic diameter of 2.5 or less; NA = The Air District has not developed a mass emissions threshold for this pollutant.

[a] The Air District's construction thresholds for PM_{10} and $PM_{2.5}$ evaluate only exhaust emissions.

[b] The mitigated scenario includes the Air District's BMPs to reduce dust and off-road equipment fitted with Tier 4 Final engines.

Operation

Emissions from project operations were calculated using CalEEMod and data provided by the applicant, as discussed in Section 3.1.3.2, *Methodology and Approach*. Net project emissions were calculated by subtracting existing year 2025 operational criteria pollutant emissions from full buildout year 2034 conditions, as previously described. The estimated unmitigated average daily operational emissions for existing year 2025, full buildout year 2034, and net emissions are presented in Table 3.1-8, and compared to the Air District's recommended mass emissions thresholds. Though the estimates provided below pertain to Scenario A, emissions for both scenarios can be found in Appendix 3.1-1, *Air Quality and Greenhouse Gas Technical Appendix*, and as detailed in Section 3.1.3.3, *Buildout Scenario Evaluated*.[11] Detailed model assumptions, inputs, and output files can also be found in Appendix 3.1-1.

Table 3.1-8. Estimated Average Daily Operational Emissions Existing Conditions, Project Uses, and Net Emissions

	Average Daily Emissions (lb/day)			
Condition and Emissions Source	**ROGs**	**NO_X**	**PM_{10} [a]**	**$PM_{2.5}$ [a]**
Existing Uses				
Mobile Sources	93.9	55.2	117.5	30.3
Area Sources	32.5	0.4	0.1	0.1
Energy Sources	0.1	2.4	0.2	0.2
Total – Existing Uses [b]	**127**	**58**	**118**	**31**
Project Buildout				
Mobile Sources [c]	74.7	45.2	175.2	44.9
Area Sources	92.8	1.0	0.2	0.1
Energy Sources [d]	--	--	--	--
Stationary Sources	0.7	2.5	0.1	0.1
Lab Sources	22.5	--	--	--
Total – Project	**191**	**49**	**175**	**45**
Net Emissions	**64**	**-9**	**58**	**15**
Significance Threshold	54	54	82	54
Exceeds Threshold?	***Yes***	***No***	***No***	***No***

Modeling files are provided in Appendix 3.1-1, *Air Quality and Greenhouse Gas Technical Appendix*. Exceedances are underlined.

Individual rows may not add up to the totals shown due to rounding.

lb/day = pounds per day; ROGs= reactive organic gases; NO_X = nitrogen oxide; PM_{10} = particulate matter no more than 10 microns in diameter; $PM_{2.5}$ = particulate matter no more than 2.5 microns in diameter.

[a] The Air District's operational thresholds for PM_{10} and $PM_{2.5}$ include both fugitive dust and exhaust emissions.

[b] As previously described, emissions from the two existing emergency generators were excluded from the baseline analysis due to insufficient operational data at the time of modeling, resulting in a conservative estimate of net project emissions.

[c] Mobile sources consist of emissions from employee, resident, and visitor vehicles traveling to and from the project site.

[d] The project would not result in any direct building energy emissions because the buildings would be all-electric and no natural gas infrastructure would be constructed, as detailed in Section 3.1.3.2, *Methodology and Approach*.

[11] While the most conservative scenario varies based on the pollutant, the overall significance level and exceedances remain consistent across both scenarios.

As shown in Table 3.1-8, operation of the project would generate ROG emissions that would exceed the applicable mass emissions threshold. After subtracting existing emissions, the project's net ROG emissions would be about 10 pounds per day above the threshold. The greatest contribution of ROG emissions is from area sources, primarily from the use of consumer products and the periodic reapplication of architectural coatings. Vehicle trips to and from the site contribute the second largest share to total emissions, while laboratory and stationary sources contribute a relatively small portion to the project's total ROG emissions. Moreover, this analysis is conservative, because emissions from the existing emergency generators have not been quantified and are not subtracted from the project emissions, as previously described. With respect to NO_X, the project would result in a net benefit because the NO_X emissions associated with the existing uses are greater than the NO_X emissions that the project will generate. Emissions of PM_{10} and $PM_{2.5}$ for the project are greater than those of the existing uses, but net emissions of these pollutants would be below the thresholds.

Because of the exceedance of ROGs, unmitigated operation of the project would result in a cumulatively considerable net increase in criteria air pollutants for which the SFBAAB is designated as a nonattainment area with respect to the federal or state ambient air quality standards. This impact is potentially significant and mitigation is required.

Mitigation Measures AQ-2-C would be implemented to reduce operational ROG emissions through the use of low-VOC architectural coatings. By requiring the use of low-VOC products, implementing **Mitigation Measures AQ-2-C** would reduce the off-gassing of ROG emissions during operations. **Mitigation Measure AQ-2-D** would reduce operational ROGs, as well as NO_X, PM_{10}, $PM_{2.5}$, emissions by requiring the replacement of gas-powered landscape equipment with zero-emissions landscape equipment, reducing emissions of ROGs, NO_X, PM_{10}, and $PM_{2.5}$ by eliminating the use of combustion engines for landscaping activities. Table 3.1-9 illustrates the project's operational emissions after applying these mitigation measures.

As shown in Table 3.1-9, with **Mitigation Measures AQ-2-C** through **AQ-2-D**, the project's net mitigated operational emissions would not exceed any of the applicable thresholds. Therefore, operation of the project with mitigation would not result in a cumulatively considerable net increase in criteria air pollutants for which the SFBAAB is designated as a nonattainment area with respect to the federal or state ambient air quality standards. This impact would be ***less than significant with mitigation***.

Table 3.1-9. Estimated Net Mitigated Average Daily Operational Emissions (Year 2034)

	Average Daily Emissions (lb/day)			
Condition and Emissions Source	**ROGs**	**NO_X**	**PM_{10} [a]**	**$PM_{2.5}$ [a]**
Existing Uses				
Mobile Sources	93.9	55.2	117.5	30.3
Area Sources	32.5	0.4	0.1	0.1
Energy Sources	0.1	2.4	0.2	0.2
Total – Existing Uses [b]	**127**	**58**	**118**	**31**
Project Buildout				
Mobile Sources [c]	74.7	45.2	175.2	44.9
Area Sources	69.6	--	--	--
Energy Sources [d]	--	--	--	--
Stationary Sources	0.7	2.5	0.1	0.1
Lab Sources	22.5	--	--	--
Total – Project	167	48	175	45
Net Emissions	41	-10	58	14
Significance Threshold	54	54	82	54
Exceeds Threshold?	***No***	***No***	***No***	***No***

Modeling files provided in Appendix 3.1-1, Air Quality and Greenhouse Gas Technical Appendix.

Individual rows may not add up to the totals shown due to rounding.

lb/day = pounds per day; ROGs= reactive organic gases; NO_X = nitrogen oxide; PM_{10} = particulate matter no more than 10 microns in diameter; $PM_{2.5}$ = particulate matter no more than 2.5 microns in diameter.

[a] The Air District's operational thresholds for PM_{10} and $PM_{2.5}$ include both fugitive dust and exhaust emissions.

[b] As described previously, emissions from the two existing emergency generators were excluded from the baseline analysis due to insufficient operational data at the time of modeling, resulting in a conservative estimate of net project emissions.

[c] Mobile sources consist of emissions from employee, resident, and visitor vehicles traveling to and from the project site.

[d] The project would not result in any direct building energy emissions because the buildings would be all-electric and no natural gas infrastructure would be constructed, as detailed in Section 3.1.3.2, Methodology and Approach.

Construction and Operation

Because the project will be developed and become operational in stages over a period of more than 7 years, certain construction phases are expected to overlap with the operation of already completed phases. For both Scenarios A and B, project construction activities in 2030 would overlap with the operation of Phases 1 and 2. Similarly, in 2031, the operation of Phases 1, 2, and 3 would coincide with ongoing construction activities. Under Scenario A, ongoing construction activities would occur concurrently with the operation of Phases 1, 2, 3, and 4 (Flex Zone 1) in 2032.[12] During the years when construction coincides with project operations (2030, 2031, and 2032), construction emissions were combined with operational emissions to provide a comprehensive estimate of the project's total emissions. This analysis conservatively assumes that buildings constructed each year would be occupied and fully operational upon completion, although, in reality, occupancy and operation of each phase may not occur immediately after construction.

[12] Under Scenario B, ongoing construction activities would continue to occur concurrently with the operation of Phases 1, 2, and 3 in 2032. Detailed emissions for Scenario B are provided in Appendix 3.1-1, *Air Quality and Greenhouse Gas Technical Appendix*.

The combined average daily construction and operational emissions were compared with average daily emissions thresholds, as shown in Table 3.1-10 and Table 3.1-11. Though the estimates provided below pertain to Scenario A, emissions for both scenarios can be found in Appendix 3.1-1, *Air Quality and Greenhouse Gas Technical Appendix*, and as detailed in Section 3.1.3.3, *Buildout Scenario Evaluated*. Detailed model assumptions, inputs, and output files can also be found in Appendix 3.1-1.

Table 3.1-10. Estimated Unmitigated Average Daily Construction plus Operational Emissions of Criteria Air Pollutants and Precursors

	Average Daily Emissions (lb/day)[a]			
Construction Year	**ROGs**	**NO_X**	**PM_{10}**	**$PM_{2.5}$**
2030				
Construction	27	37	45	11
Operation	85	22	78	20
Existing [b]	-127	-58	-118	-31
Combined Total	**-16**	**1**	**5**	**1**
Significance Thresholds	54	54	82	54
Exceeds Threshold?	***No***	***No***	***No***	***No***
2031				
Construction	26	36	48	12
Operation	130	33	119	31
Existing [b]	-127	-58	-118	-31
Combined Total	**29**	**11**	**50**	**12**
Significance Thresholds	54	54	82	54
Exceeds Threshold?	***No***	***No***	***No***	***No***
2032				
Construction	28	28	39	10
Operation	164	42	151	39
Existing [b]	-127	-58	-118	-31
Combined Total	**65**	**12**	**72**	**18**
Significance Thresholds	54	54	82	54
Exceeds Threshold?	***Yes***	***No***	***No***	***No***

Source: Modeling files provided in Appendix 3.1-1, *Air Quality and Greenhouse Gas Technical Appendix*. Exceedances are underlined.

Totals may not add up because of rounding.

lb/day = pounds per day; ROGs= reactive organic gases; NO_X = nitrogen oxide; PM_{10} = particulate matter no more than 10 microns in diameter; $PM_{2.5}$ = particulate matter no more than 2.5 microns in diameter.

[a] The Air District's operational thresholds for PM_{10} and $PM_{2.5}$ include both fugitive dust and exhaust emissions.

[b] As previously described, emissions from the two existing emergency generators were excluded from the baseline analysis due to insufficient operational data at the time of modeling, resulting in a conservative estimate of net project emissions.

As shown in Table 3.1-10, overlapping construction and operational activities in 2032 would generate unmitigated ROG emissions that exceed the Air District's recommended threshold.[13] Similar to the operational-only discussion above, the primary contributors to the exceedance of ROG are area and mobile sources. While area and mobile sources will generate fewer ROG emissions during the interim years compared to full buildout, ongoing construction activities will also contribute to the project's net ROG emissions during interim years. With the implementation of **Mitigation Measures AQ-2-A** through **AQ-2-D**, which have been introduced previously, emissions of both construction and operations would be reduced through multiple methods. Table 3.1-11 presents the construction and operational emissions during the interim years when the overlap occurs with implementation of these mitigation measures.

Table 3.1-11. Estimated Mitigated Average Daily Construction plus Operational Emissions of Criteria Air Pollutants and Precursors

	Average Daily Emissions (lb/day) [a]			
Construction Year	**ROGs**	**NO_X**	**PM_{10}**	**$PM_{2.5}$**
2030				
Construction	26	24	44	11
Operation	74	21	78	20
Existing [b]	-127	-58	-118	-31
Combined Total	**-26**	**-13**	**4**	**<1**
Significance Thresholds	54	54	82	54
Exceeds Threshold?	***No***	***No***	***No***	***No***
2031				
Construction	26	20	48	12
Operation	114	32	119	31
Existing [b]	-127	-58	-118	-31
Combined Total	**13**	**-6**	**49**	**12**
Significance Thresholds	54	54	82	54
Exceeds Threshold?	***No***	***No***	***No***	***No***
2032				
Construction	28	12	39	10
Operation	144	41	150	39
Existing [b]	-127	-58	-118	-31
Combined Total	**45**	**-5**	**72**	**18**
Significance Thresholds	54	54	82	54
Exceeds Threshold?	***No***	***No***	***No***	***No***

Source: Modeling files provided in Appendix 3.1-1, *Air Quality and Greenhouse Gas Technical Appendix*.
Totals may not add up because of rounding.
lb/day = pounds per day; ROGs= reactive organic gases; NO_X = nitrogen oxide; PM_{10} = particulate matter no more than 10 microns in diameter; $PM_{2.5}$ = particulate matter no more than 2.5 microns in diameter.
[a] The Air District's operational thresholds for PM_{10} and $PM_{2.5}$ include both fugitive dust and exhaust emissions.

[13] Under Scenario B, there were no exceedances related to overlapping construction and operational emissions. Detailed emissions for Scenario B are provided in Appendix 3.1-1, *Air Quality and Greenhouse Gas Technical Appendix*.

[b] As previously described, emissions from the two existing emergency generators were excluded from the baseline analysis due to insufficient operational data at the time of modeling, resulting in a conservative estimate of net project emissions.

As shown in Table 3.1-11, implementation of **Mitigation Measures AQ-2-A** through **AQ-2-D** would result in the combined construction and operational emissions being below the Air District's recommended thresholds. Therefore, mitigated emissions resulting from overlapping construction and operational activities would not result in a cumulatively considerable net increase in criteria air pollutants for which the SFBAAB is designated as a nonattainment area with respect to the federal or state ambient air quality standards. This impact would be ***less than significant with mitigation***.

Mitigation Measures

Mitigation Measure AQ-2-A: Use Clean Diesel-Powered or Electric Equipment During Construction to Control Construction-related Emissions.

The project applicant shall require its contractor(s), as a condition of contracts (e.g., standard specifications), to ensure that all off-road diesel-powered equipment greater than 50 horsepower used during construction is equipped with EPA-approved Tier 4 Final engines or cleaner[14] to reduce exhaust $PM_{2.5}$ emissions. The construction contractor shall submit evidence of the use of EPA-approved Tier 4 Final engines or cleaner to the City of San Bruno Department of Community Development prior to the commencement of project construction activities. Exceptions can be made in limited circumstances for equipment where Tier 4 Final engines are not available or otherwise cannot be feasibly obtained. The project applicant or construction contractor must identify these pieces of equipment that would not have Tier 4 Final engines, submit evidence documenting the unavailability or infeasibility, and ensure that the equipment has an engine that meets the cleanest feasible emission standard. The project applicant shall submit evidence that the equipment substitution(s) would not cause an exceedance of the Bay Area Air District average daily threshold for any pollutant.

Mitigation Measure AQ-2-B: Implement Modified Bay Area Air District Basic Construction Mitigation Measures to Reduce Dust Emissions.

The project applicant shall require its contractor(s), as a condition of contracts (e.g., standard specifications), to reduce construction-related fugitive dust emissions by implementing the following modified Bay Area Air District basic BMPs.

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, unpaved access roads) shall be watered three times per day.[15]
- All haul trucks transporting soil, sand, or other loose material offsite shall be covered.
- All visible mud or dirt trackout 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.

[14] Cleaner engine technology includes electric equipment and CARB Tier 5 engine standards, which are expected to begin in 2028.

[15] This component of the mitigation measure modifies the Air District's BMPs by increasing the watering frequency from two to three times per day. The increased frequency is necessary to reduce the impact of Impact AQ-3 but would also apply to Impact AQ-2.

- 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.
- All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.
- All trucks and equipment, including their tires, shall be washed off prior to leaving the project site.
- Unpaved roads providing access to sites located 100 feet or more from a paved road shall be treated with a 6- to 12-inch layer of compacted layer of wood chips, mulch, or gravel.
- Publicly visible signs shall be posted with the telephone number and name of the 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 general air pollution complaints number shall also be visible to ensure compliance with applicable regulations.

The project applicant shall submit evidence of compliance to the City Department of Community Development prior to grading permit issuance.

Mitigation Measure AQ-2-C: Require Low-VOC Coatings During Project Operation.

The project applicant shall ensure that low-VOC coatings with a VOC content of 50 grams/liter (g/L) or less are used during project operation to reduce ROG emissions. The project applicant shall submit evidence of compliance to the City Department of Community Development prior to certificate of occupancy.

Mitigation Measure AQ-2-D: Replace Gas-Powered Landscape Equipment with Zero-Emissions Landscape Equipment.

The project applicant shall provide education for tenants concerning zero-emissions landscape equipment. The project applicant, as a condition of contract, shall require that all tenants only use electric landscaping equipment throughout project operation, to reduce ROGs, NO_X, PM_{10}, and $PM_{2.5}$ emissions. By the time the project is operational, new internal-combustion engine landscaping equipment will not be available for purchase in California and, thus, electric landscaping equipment will be the only commercially available landscaping equipment for purchase.

Impact AQ-3: The project would expose sensitive receptors to substantial pollutant concentrations (Significant and Unavoidable).

Sensitive land uses are generally considered to include those uses where exposure to pollutants could result in health-related risks for sensitive individuals. The nearest offsite sensitive land uses are the residences east and southeast of the project site across Huntington Avenue.

The primary pollutants of concern for health risks for sensitive receptors are criteria pollutants, specifically CO at potential intersection hot spots, asbestos, DPM, and localized $PM_{2.5}$. Each of these topics is analyzed in the paragraphs that follow.

Regional Health Impacts of Criteria Air Pollutants

Adverse health effects induced by regional criteria pollutant emissions generated by the project (ozone precursors and PM) are highly dependent on a multitude of interconnected variables (e.g., cumulative concentrations, local meteorology and atmospheric conditions, the number and character of exposed individuals [e.g., age, gender]). Ozone precursors (ROGs and NO_X) contribute to the formation of ground-borne ozone on a regional scale. Emissions of ROGs and NO_X generated in one area may not equate to a specific ozone concentration in that same area. Similarly, some types of particulate pollution may be transported over long distances or formed through atmospheric reactions. As such, the magnitudes and locations of specific health effects from exposure to increased ozone or regional PM concentrations are the product of emissions generated by numerous sources throughout a region, as opposed to a single individual project. Moreover, exposure to regional air pollution does not guarantee that an individual will experience an adverse health effect—as discussed previously, there are large individual differences in the intensity of symptomatic responses to air pollutants. These differences are influenced, in part, by the underlying health condition of an individual, which cannot be known.

Models and tools have been developed to correlate regional criteria pollutant emissions to potential community health impacts. While there are models capable of quantifying ozone and secondary PM formation and associated health effects, these tools were developed to support regional planning and policy analysis and have limited sensitivity to small changes in criteria pollutant concentrations induced by individual projects.

As discussed previously, the Air District's regional thresholds consider existing air quality concentrations and attainment or nonattainment designations under the NAAQS and CAAQS. The NAAQS and CAAQS are informed by a wide range of scientific evidence that demonstrates there are known safe concentrations of criteria pollutants. Although the Air District recognizes that air quality is a cumulative problem, it considers projects that generate criteria pollutant and ozone precursor emissions that fall below the thresholds to be minor in nature; therefore, such projects would not adversely affect air quality to the extent that the health-protective NAAQS or CAAQS would be exceeded.

As shown in Table 3.1-7, construction activities in 2027 would generate NOx emissions that exceed the applicable threshold of significance. However, with the incorporation of **Mitigation Measures AQ-2-A** and **AQ-2-B**, mass emissions of fugitive dust and criteria pollutants associated with project construction would be reduced to less-than-significant levels. Similarly, the project would result in an exceedance of ROGs during the overlap of construction and operations and during operations alone. However, as shown in Table 3.1-9, operation of the project would not generate regional criteria pollutants in excess of the applicable thresholds with the incorporation of **Mitigation Measures AQ-2-C** through **AQ-2-D**. As such, the project would not be expected to contribute a significant level of air pollution that would degrade air quality within the SFBAAB.

Because the project would not be expected to contribute a significant level of air pollution that would degrade air quality within the SFBAAB, and any health outcomes resulting from the project would be minor compared to the background occurrences of health outcomes, the project's health impacts related to regional criterial pollutants would be ***less than significant***.

Localized Carbon Monoxide Hot Spots

Continuous engine exhaust may elevate localized CO concentrations, resulting in hot spots. Receptors exposed to these CO hot spots may have a greater likelihood of developing adverse health effects. CO hot spots are typically observed at heavily congested intersections where a substantial number of gasoline-powered vehicles idle for prolonged durations throughout the day. As discussed previously, the Air District has developed screening criteria to assist lead agencies in evaluating potential impacts from localized CO. The Air District's screening criteria for CO hot spots is 44,000 vehicles per hour at affected intersections and 24,000 vehicles per hour at affected intersections where vertical or horizontal mixing is limited (i.e., a tunnel).

To use the Air District's quantitative screening criteria to evaluate CO hot spots, a project must be consistent with an applicable congestion management plan. The project would be consistent with the applicable congestion management plan by complying with the C/CAG Congestion Management Program TDM, as described in the *Tanforan Transportation Analysis Summary* (Fehr & Peers 2025). As a result, the Air District's quantitative screening values were used to evaluate the project's potential to create CO hot spots.

As demonstrated by the predicted traffic volumes, based on the number of net new trips provided in the *Tanforan Transportation Analysis Summary*, the project would not increase traffic volumes at any intersection to more than 44,000 vehicles per hour or 24,000 vehicles per hour in areas where vertical or horizontal mixing is limited, as specified by the Air District. Accordingly, sensitive receptors would not be exposed to substantial concentrations of CO. This impact would be ***less than significant***.

Diesel Particulate Matter, Laboratory Toxic Air Contaminants, and Localized Particulate Matter$_{2.5}$

DPM is a carcinogen contained in the exhaust of diesel internal-combustion engines. Project-related construction activities would generate DPM (i.e., PM_{10} exhaust from diesel vehicles)[16] from the use of off-road equipment and heavy-duty trucks. PM_{10} exhaust and $PM_{2.5}$ exhaust and fugitive dust emissions would be generated from the use of off-road equipment, onsite soil movement, and heavy-duty trucks and worker vehicles traveling on paved and unpaved roads.

Operational activities would generate DPM from the use of delivery trucks and other heavy vehicles traveling to and from the site, and the testing of emergency generators. $PM_{2.5}$ emissions would be generated by all vehicles traveling to and from the site, and the testing of emergency generators. Laboratories would generate fugitive ROG-based TACs. All these activities could expose offsite and onsite receptors to incremental increases in health risks.

Health impacts from exposure to DPM include cancer risks and chronic non-cancer risks. Health impacts from exposure to ROG-based TACs include cancer risks, chronic non-cancer risks, and acute non-cancer risks. Additionally, the HRA includes an evaluation of annual concentrations of PM_{10} exhaust and total $PM_{2.5}$.

[16] Per Air District guidance, PM_{10} exhaust is used as a surrogate for DPM.

As discussed in Impact AQ-2, unmitigated project emissions would exceed Bay Area Air District regional thresholds for construction and operations, and mitigation would be required. Therefore, because mitigation would be required to reduce regional criteria pollutant emissions, only mitigated health risks for offsite and onsite receptors were analyzed. Table 3.1-12 presents the maximum health risks for offsite and onsite receptors under the six scenarios discussed in Section 3.1.3.2, *Methodology and Approach.*

Table 3.1-12. Estimated Project-Level Health Risk Results from Modeled Scenarios

Receptor Type	Cancer Risk (cases per million)	Non-Cancer Chronic Risk [g]	Non-Cancer Acute Risk [g]	Annual $PM_{2.5}$ Concentrations ($\mu g/m^3$) (unmitigated/mitigated) [g,h]
Scenario 1 – Exposure Starting at Beginning of Construction Phase Make Ready [a]				
MEIR – offsite	7.4	< 0.01	NA	0.23/0.21
MEIR - onsite	NA	NA	NA	NA
Significance Threshold	10.0	1.0	1.0	0.3
Exceeds Threshold?	**No**	**No**	**No**	**No**
Scenario 2 – Exposure Starting at Beginning of Construction Phase 1 [b]				
MEIR – offsite	5.8	< 0.01	NA	0.23/0.21
MEIR - onsite	NA	NA	NA	NA
Significance Threshold	10.0	1.0	1.0	0.3
Exceeds Threshold?	**No**	**No**	**No**	**No**
Scenario 3 – Exposure Starting at Beginning of Construction Phase 2 [c]				
MEIR - offsite	6.1	< 0.01	N/A	0.23/0.21
MEIR - onsite	NA	NA	NA	NA
Significance Threshold	10.0	1.0	1.0	0.3
Exceeds Threshold?	**No**	**No**	**No**	**No**
Scenario 4 – Exposure Starting at Beginning of Construction Phase 3 [d]				
MEIR – offsite	7.3	< 0.01	NA	0.23/0.21
MEIR – onsite	**12.2**	0.01	NA	**0.38/0.34**
Significance Threshold	10.0	1.0	1.0	0.3
Exceeds Threshold?	**Yes**	**No**	**No**	**Yes**
Scenario 5 – Exposure Starting at Beginning of Construction Phase 4 [e]				
MEIR – offsite	8.4	< 0.01	NA	0.23/0.21
MEIR – onsite	**12.5**	0.01	NA	**0.38/0.34**
Significance Threshold	10.0	1.0	1.0	0.3
Exceeds Threshold?	**Yes**	**No**	**No**	**Yes**
Scenario 6 – Exposure to Project Buildout Operations [f]				
MEIR – offsite	9.4	0.02	0.01	0.23/0.23
MEIR – onsite	7.1	0.08	0.01	0.20/0.20
Significance Threshold	10.0	1.0	1.0	0.3
Exceeds Threshold?	**No**	**No**	**No**	**No**

Exceedances of thresholds are indicated with bold and underlined text.

MEIR = Maximally Exposed Individual Receptor; $\mu g/m^3$ = micrograms per cubic meter; $PM_{2.5}$ = particulate matter with an aerodynamic diameter of 2.5 or less.

[a] For Scenario 1, the evaluation of cancer risk was modeled for an exposure duration with 7.4 years of construction and 22.9 years of operations for an offsite resident. For an offsite worker, the evaluation of cancer risk was modeled for an exposure duration with 7.4 years of construction and 17.6 years for operations.

[b] For Scenario 2, the evaluation of cancer risk was modeled for an exposure duration with 6.3 years of construction and 23.9 years of operations for an offsite resident. For an offsite worker, the evaluation of cancer risk was modeled for an exposure duration with 6.3 years of construction and 18.7 years for operations.

[c] For Scenario 3, the evaluation of cancer risk was modeled for an exposure duration with 5.3 years of construction and 24.9 years of operations for an offsite resident. For an offsite worker, the evaluation of cancer risk was modeled for an exposure duration with 5.3 years of construction and 19.7 years for operations.

[d] For Scenario 4, the evaluation of cancer risk was modeled for an exposure duration with 4.4 years of construction and 25.8 years of operations for an offsite resident and 3.7 years of construction and 26.6 years of operation for an onsite resident. For offsite and onsite workers, the evaluation of cancer risk was modeled for an exposure duration with 4.4 years and 3.7 years of construction, respectively, and 20.6 years and 21.3 years, respectively, for operations.

[e] For Scenario 5, the evaluation of cancer risk was modeled for an exposure duration with 3.2 years of construction and 27.0 years of operations for offsite and onsite residents. For offsite and onsite workers, the evaluation of cancer risk was modeled for an exposure duration with 3.2 years of construction and 21.8 years for operations.

[f] For Scenario 6, the evaluation of cancer risk was modeled for an exposure duration with 30 years of operations for offsite and onsite residents. For offsite and onsite workers, the evaluation of cancer risk was modeled for an exposure duration with 25 years for operations.

[g] Only construction emissions contributions to hazard indices and annual $PM_{2.5}$ concentrations are shown for Scenarios 1 through 5. Operational emissions contributions to hazard indices and annual $PM_{2.5}$ concentrations are shown for Scenario 6.

[h] Mitigated emissions are only shown for $PM_{2.5}$, because there is only one mitigation measure (Mitigation Measure AQ-2-B) that is required as a result of a potentially significant impact discussed under Impact AQ-3. The other mitigation measures in this section are required as a result of potentially significant impacts discussed under Impact AQ-2. Since those measures are already required per Impact AQ-2, they are included in the HRA regardless of whether they may be needed to mitigate an impact for Impact AQ-3.

As shown in Table 3.1-12, there would be exceedances of the cancer risk threshold and $PM_{2.5}$ threshold in Scenarios 4 and 5 for future onsite receptors. For offsite receptors, there would be no exceedances of any Air District project-level health risk threshold.

For future onsite residential receptors, as modeled in Scenarios 4 and 5, cancer risk would be above the threshold from TAC emissions generated during ongoing construction at later phases of development. Similarly, onsite residential and worker receptors would experience a significant $PM_{2.5}$ impact in the same scenarios from exhaust and fugitive dust emissions.

The causes of the cancer risk threshold exceedance for onsite receptors are from future residential receptors being exposed to DPM during construction at the site and then to TACs for nearly 30 years during operations, specifically DPM from generator testing and truck traffic and laboratory-related TACs from onsite laboratory uses. The primary causes of the $PM_{2.5}$ concentration exceedances are onsite off-road equipment activity, earthmoving activities, and vehicle travel, which generates fugitive $PM_{2.5}$ from resuspended road dust.

Mitigation Measure AQ-3-A would be implemented to reduce exposure of future onsite receptors to emissions associated with construction and operational activities by requiring the installation of Minimum Efficiency Reporting Value (MERV) 13 air filters, or equivalent. However, the effectiveness of installing filters to reduce health risks is difficult to quantify, as the HVAC system must be running for the filters to work and efficacy is limited when windows are open or residents are outdoors. Therefore, health risks and $PM_{2.5}$ concentrations are conservatively assumed to exceed the Air District's thresholds after the incorporation of **Mitigation Measures AQ-2-A**, **AQ-2-B**, **AQ-2-D**, and **AQ-3-A**, and no further mitigation is available. The project would result in a ***significant and unavoidable impact*** with respect to health risks and $PM_{2.5}$ impacts.

Asbestos

Asbestos is a naturally occurring mineral that was previously used in building construction because of its heat resistance and strong insulating properties. Exposure to asbestos, however, has been shown to cause many disabling and fatal diseases, including lung cancer, mesothelioma, and pleural plaques. Demolition of the existing hardscape (asphalt and concrete) and buildings on the project site may expose workers and nearby receptors to asbestos if it was used during construction of the original hardscape and buildings. However, the project would comply with Bay Area Air District Regulation 11, Rule 2, Asbestos, Demolition, Renovation, and Manufacturing. The purpose of this rule is to control emissions of asbestos to the atmosphere during demolition and building renovation. Because the project would be required to control asbestos emissions according to Air District regulations, receptors would not be exposed to substantial asbestos risks, and impacts associated with asbestos emissions would be ***less than significant***.

Mitigation Measures

Mitigation Measure AQ-3-A: Installation of High-Efficiency Air Filtration Systems

The project applicant shall ensure that all heating, ventilation, and air conditioning (HVAC) systems installed in new residential units within the project site utilize Minimum Efficiency Reporting Value (MERV) 13 air filters, or equivalent. The project applicant shall demonstrate compliance with this requirement by providing documentation confirming installation of compliant filters prior to the issuance of a certificate of occupancy for any residential building.

Impact AQ-4: Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people (Less than Significant).

As previously discussed, odor impacts could occur if a project proposes a new odor source near existing receptors. There are many sensitive receptors within 1,000 feet of the project site. However, the project does not include any new odor-generating facilities (e.g., wastewater treatment plants, landfills, and food manufacturing plants).

Minor odors may result from construction activities generating diesel exhaust, asphalt paving, and the use of architectural coatings and solvents. Construction-related activities would be temporary and intermittent, and any odors emitted would not affect a substantial number of people. During operation, odors could arise from emergency generator testing and maintenance, activities at the proposed laboratory uses, and vehicle exhaust and the reapplication of architectural coatings. These odors would be limited to areas adjacent to the building. Although such brief exhaust- and paint-related odors may be considered adverse, they would not affect a substantial number of people. Consequently, odors from project operation are not expected to exceed the Air District threshold of five confirmed complaints per year averaged over three years. Additionally, the project would comply with Bay Area Air District Regulation 7, ensuring that any odors from construction and operation would not exceed the Air District's general odor limitations or specific limitations on odorous compounds.

Thus, the project does not propose any odor-generating facilities, such as those identified by the Air District in its CEQA Guidelines (BAAQMD 2023: Table 5-4), and would not be expected to exceed the applicable Air District threshold. Therefore, odor impacts for the project would be ***less than significant***.

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3.1.5 Personal Communications

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3.2 Biological Resources

3.2.1 Introduction

This section evaluates the potential impacts on biological resources that could result from construction and operation of the Tanforan Redevelopment Project (project). This section also describes existing conditions at the project site as well as the regulatory framework for this analysis. Impacts resulting from implementation of the project, and feasible mitigation measures, where applicable, are described.

Relevant technical documentation used in this analysis includes the following technical studies prepared for the project.

- Biological database queries conducted for the project site by ICF in January 2025 (Appendix 3.2-1, *Biological Database Queries*).
- Tanforan Mall Tree Survey dated February 15, 2024 (Appendix 3.2-2, *Tree Inventory*).

Issues identified in response to the Notice of Preparation (NOP) (Appendix 1-1, *Notice of Preparation and Comments Received on the Notice of Preparation*) were considered in preparing this analysis. The NOP comments pertaining to biological resources include a recommendation by the California Department of Fish and Wildlife (CDFW) Bay Delta Region to incorporate mitigation for special-status species, which may be present on the project site. This issue is addressed in Section 3.2.3.4, *Impacts and Mitigation Measures*, under Impact BIO-1. CDFW also provided comments pertaining to the incorporation of regulatory requirements; these are addressed in Section 3.2.2.1, *Regulatory Setting*. CDFW also provided comments pertaining to the use of environmental data related to special-status species and environmental communities; these are addressed under Impact BIO-1 and in Appendix 3.2-1, *Biological Database Queries*. Lastly, CDFW provided comments related to cumulative impacts, which are discussed in Chapter 5, *Other CEQA Considerations*.

3.2.2 Existing Conditions

3.2.2.1 Regulatory Setting

This section summarizes regulations and policies that are relevant to the analysis of the project's potential impacts on biological resources.

Federal

Federal Endangered Species Act

Pursuant to the federal Endangered Species Act (ESA) (16 United States Code, Title 16, Section 1531 et seq.), the U.S. Fish and Wildlife Service (USFWS) regulates the taking of species listed in the ESA as threatened or endangered. In general, persons subject to ESA (including private parties) are prohibited from "taking" endangered or threatened fish and wildlife species on private property, and from "taking" endangered or threatened plants in areas under federal jurisdiction or in violation of state law. Under Section 9 of the ESA, the definition of "take" is to "harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct." USFWS has also interpreted the definition of "harm" to include significant habitat modification that could result

in take. Section 10 of the ESA applies if a nonfederal agency is the lead agency for an action that results in take and no other federal agencies are involved in permitting the action. Section 7 of the ESA applies if a federal discretionary action is required (e.g., a federal agency must issue a permit), in which case the involved federal agency consults with USFWS.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA), first enacted in 1918, provides for protection of international migratory birds and authorizes the Secretary of the Interior to regulate the taking of migratory birds. The MBTA provides that it will be unlawful, except as permitted by regulations, to pursue, take, or kill any migratory bird, or any part, nest, or egg of any such bird. Under the MBTA, "take" is defined as "to pursue, hunt, shoot, wound, kill, trap, capture, or collect, or any attempt to carry out these activities." A take does not include habitat destruction or alteration, as long as there is not a direct taking of birds, nests, eggs, or parts thereof. The current list of species protected by the MBTA can be found in Title 50 of the Code of Federal Regulations (CFR), Section 10.13. The list includes nearly all birds that are native to the United States.

State

California Native Plant Protection Act

The California Native Plant Protection Act of 1977 (CNPPA) prohibits the importation of rare and endangered plants into California, take of rare and endangered plants, and sale of rare and endangered plants. The California Endangered Species Act (CESA) defers to the CNPPA, ensuring that state-listed plant species are protected when state agencies are involved in projects that are subject to the California Environmental Quality Act (CEQA). In this case, plants that are listed as rare under the CNPPA are not protected under the CESA but rather under CEQA.

California Endangered Species Act

Pursuant to the CESA, a permit from CDFW is required for projects that could result in the "take" of a plant or animal species that is listed by the state as threatened or endangered. Under CESA, "take" is defined as an activity that would directly or indirectly kill an individual of a species but does not include "harm" or "harass," as does the federal definition. As a result, the threshold for take is higher under CESA than under the federal ESA. Authorization for take of state-listed species can be obtained through a California Fish and Game Code Section 2081 incidental take permit.

California Fish and Game Code Sections 3503 and 3503.5—Protection of Bird Nests and Raptors

Section 3503 of the Fish and Game Code states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird. Section 3503.5 of the California Fish and Game Code states that it is unlawful to take, possess, or destroy any raptors (i.e., species in the orders Falconiformes and Strigiformes), including their nests or eggs. Typical violations include destruction of active nests as a result of tree removal or disturbance caused by project construction or other activities that cause the adults to abandon the nest, resulting in loss of eggs and/or young.

Fully Protected Species (California Fish and Game Code)

A fully protected species is one that cannot be taken or possessed at any time. Protection of fully protected species is described in Sections 3511, 4700, 5050, and 5515 of the California Fish and Game Code. These sections of the code prohibit take or possession of fully protected species and do not provide for authorization of incidental take. Senate Bill 147 was signed into law on July 10, 2023, to amend the fully protected species statutes and create a temporary 10-year period where proponents of a limited set of activities can receive project approval even if there could be take of fully protected species.

Local

San Bruno General Plan

The *San Bruno General Plan* (City of San Bruno 2009) outlines a vision for the long-range physical and economic development of the community through 2025. This vision includes balanced development, conservation of residential neighborhoods, and revitalization of downtown and other aging commercial and industrial areas. The *San Bruno General Plan* land use designations, policies, and implementing actions guides City of San Bruno officials in making decisions on private development proposals and public facilities. The plan contains an Environmental Resources and Conservation Element, which outlines policies relating to biological resources and habitat, water quality, air quality, global climate change, historical and cultural resources, and environmental resources and conservation policies. The *San Bruno General Plan* includes the following policies that were adopted to avoid or mitigate environmental impacts on biological resources and are applicable to the proposed project (City of San Bruno 2009).

- **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. 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. If no special status species are detected during these surveys, then construction-related activities may proceed. If listed special status species are found with the construction zone, then avoid these species and their habitat or consult with U.S. Fish and Wildlife Service and/or California Department of Fish and Game.
- **ERC-17:** If construction activities, including tree removal activities, are required adjacent to or within natural areas, 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.

San Bruno Municipal Code

Chapter 8.24, Street Trees and Other Plantings, and Chapter 8.25, Heritage Trees, in Title 8, Streets, Sidewalks, and Rights-of-Way, of the San Bruno Municipal Code concern the preservation of trees. Chapter 8.24 provides a plan to regulate the planting and maintenance of trees and other plantings in and along the public streets, ways, and public easements within San Bruno and to provide for orderly development and promote the health, safety, comfort, and general welfare of the public. (Ordinance 1668, Section 2, 2002). Chapter 8.25 notes that the majority of trees in San Bruno are on private property, and the provisions in Chapter 8.24 for the protection of street trees are inadequate to fully protect and preserve San Bruno's urban forest canopy against the unregulated pruning and removal of mature trees on private property. Chapter 8.25 regulates the removal of heritage trees in San Bruno to retain as many trees as possible.

Protected trees, which include street trees and heritage trees, are defined by San Bruno Municipal Code, Title 8, as follows.

- Street tree: any tree planted after the adoption of Ordinance No. 1320 within any street, right-of way, or easement adjacent thereto. (Municipal Code Section 8.04.120, Ordinance 1320, Section 1, 1979 [prior code: Sections 25-2.1–25-2.6]). The director of public works or designee shall be solely responsible for determining whether existing trees planted in or adjacent to the public right-of-way are to be deemed official street trees for purposes of the application of this chapter (Municipal Code Section 8.24.020, Ord. 1668 § 2, 2002; Ord. 1944, 12/12/2024).
- Heritage tree (Municipal Code Section 8.25.020):
    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 6 inches or more measured 54 inches above natural grade;
    2. Any tree or stand of trees designated by resolution of the San Bruno 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 10 inches or more, measured 54 inches above natural grade.

Pursuant to San Bruno Municipal Code Chapter 8.24, a permit is required prior to pruning, removal, or interference with street trees and tree stakes. Pursuant to Chapter 8.25, a permit is required for the removal or certain types of pruning of heritage trees. Protected trees cannot be removed, pruned, or otherwise materially altered without a permit from the City of San Bruno and must be protected from development-related impacts. Removed protected trees are required to be replaced in accordance with San Bruno Municipal Code requirements (in the case of street trees, in-lieu fees may be paid). In addition, new developments must conform to a series of tree planting requirements.

3.2.2.2 Environmental Setting

Regional Setting

San Bruno is a 5.5 square-mile (3,500-acre) city in San Mateo County on the eastern side of the San Francisco Peninsula, which includes a diversity of natural resources and hosts a variety of habitats, including diverse vegetative communities (freshwater wetlands, willow riparian, mixed oak woodlands, nonnative annual grassland) and sensitive species habitats. The City is approximately 12 miles south of San Francisco, immediately north of the City of Millbrae and west of the San Francisco

International Airport, bounded by Highway 101 on the east and the Coast Range on the west. The older, eastern half of San Bruno contains a diversity of land uses and residential types, while the western half comprises mostly single family subdivisions. The City is connected to major transportation corridors by Highway 101, Interstates 280 and 380, and El Camino Real.

Project Site

The project site is in an urban environment and is currently developed as a shopping center. The mall property is currently developed with various retail uses, parking structures, and surface parking. The project site consists of a primary two-story building that includes three attached anchor stores. Two are currently occupied by Hyundai of San Bruno (formerly Sears) and Target. The third anchor store is vacant as of May 2025 (formerly JC Penney). A three-level parking structure serving Target and a two-level steel structure exist in the southern portion of the project site. A Cinemark Century movie theater and an automotive service building exist in the northern portion of the project site. The movie theater sits atop a three-level parking structure. Existing parking on the project site includes various surface parking lots surrounding the Tanforan Mall and three parking structures.

Review of the CDFW California Natural Diversity Database (CNDDB) list, USFWS Information for Planning and Consultation (IPaC) list, and the California Native Plant Society (CNPS) list show special-status species that have the potential to occur in the project area. CNDDB shows 77 special-status species (CDFW 2025), the IPaC list shows 17 special-status species (USFWS 2025a), and the CNPS list (CNPS 2025) shows two special-status plant species. They include, but are not limited to, the species shown in Table 3.2-1. The complete lists are included in Appendix 3.2-1, *Biological Database Queries*.

Table 3.2-1. Special-Status Species with Potential to Occur on the Project Site

Common Name	Scientific Name	Federal Status	State Status	CDFW Status
California Ridgway's rail	*Rallus obsoletus obsoletus*	Endangered	Endangered	FP
Alameda song sparrow	*Melospiza melodia pusillula*	None	None	SSC
American peregrine falcon	*Falco peregrinus anatum*	Delisted	Delisted	--
California red-legged frog	*Rana draytonii*	Threatened	None	SSC
San Francisco gartersnake	*Thamnophis sirtalis tetrataenia*	Endangered	Endangered	FP
Hoary bat	*Lasiurus cinereus*	None	None	--
Townsend's big-eared bat	*Corynorhinus townsendii*	None	None	SSC
Stage's dufourine bee	*Dufourea stagei*	None	None	--
Mission blue butterfly	*Icaricia icarioides missionensis*	Endangered	None	--
Callippe silverspot butterfly	*Speyeria callippe callippe*	Endangered	None	--

Source: CDFW 2025.

On July 19, 2024, an ICF biologist conducted a pedestrian field survey of the project site to assess land cover types and the site's suitability to contain sensitive biological resources or habitat. The field survey did not identify any sensitive habitat at the project site. Landscape trees and minimal vegetation exist in planter areas throughout the project site, predominantly along the site perimeters. A tree inventory was performed by Walter Levison, Consulting Arborist in February 2024 (Appendix 3.2-2, *Tree Inventory*). A total of 117 trees were documented in the tree inventory,

49 of which are protected under the City's ordinance. During the July 2024 field survey, it was determined that three trees were no longer onsite; therefore, the total number of onsite trees is 114 (still including 49 protected trees). No drainages or waterways are present on the site.

3.2.3 Environmental Impact Analysis

This section describes the environmental impacts of the project on biological resources. It describes the thresholds used to determine whether an impact would be significant and methods used to evaluate the impacts. Measures to mitigate significant impacts are provided, where appropriate.

3.2.3.1 Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, the project would have the potential to have a significant effect on biological resources if it would result in any of the following conditions.

a. 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 CDFW or USFWS.

b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by CDFW or USFWS.

c. 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.

d. 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.

e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

f. Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan.

3.2.3.2 Methodology and Approach

The evaluation of the proposed project's impacts on biological resources is based on a desktop review of the following sources, all of which are included in Appendix 3.2-1, *Biological Database Queries*.

- CNDDB species list query for a 1-mile buffer around the project site (CDFW 2025).
- CNPS species list query for the U.S. Geological Survey South San Francisco (3712264) 7.5-minute quadrangle (CNPS 2025).
- USFWS IPaC query of the project site (USFWS 2025a).
- USFWS wetlands mapper query of project site (USFWS 2025b).
- Tree survey data for Tanforan Mall (Walter Levison, Consulting Arborist 2024).

The evaluation of the proposed project's impacts on biological resources is also based on the pedestrian field survey of the project site conducted by an ICF biologist on July 19, 2024. Due to the lack of suitable habitat onsite, focused surveys for special-status plant or animal species were not conducted.

3.2.3.3 Buildout Scenario Evaluated

As discussed in Section 3.0.3.1, *Buildout Scenarios*, for each resource area studied, the EIR evaluates the buildout scenario with the greatest potential to result in a significant impact. In some cases, impacts would be the same regardless of the buildout scenario, so the analysis does not evaluate a specific buildout scenario. This approach ensures that the EIR identifies the maximum potential impacts of the project based on reasonably foreseeable development outcomes. Table 3.2-2 summarizes the approach used for each impact analysis related to biological resources.

Table 3.2-2. Impact Analysis Approach for Biological Resources

Impact Criteria	Scenario A	Scenario B	EIR Approach
Impact BIO-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 or U.S. Fish and Wildlife Service?	--	--	Same for both scenarios. The project footprint, the presence or absence of habitat and special-status species, and the project's general characteristics dictate the impacts on habitat and special-status species. The project area, existing conditions, and general project characteristics are the same under both scenarios; therefore, the analysis approach is not based on one scenario or the other, and accounts for any future development that could occur under the project.
Impact BIO-2: Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	--	--	Same for both scenarios. The project footprint, the presence or absence of riparian habitat and sensitive natural communities, and the project's general characteristics dictate the impacts on riparian habitat and sensitive natural communities. The project area, existing conditions, and general project characteristics are the same under both scenarios; therefore, the analysis approach is not based on one scenario or the other, and accounts for any future development that could occur under the project.
Impact BIO-3: Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means?	--	--	Same for both scenarios. The project footprint, the presence or absence of wetlands, and the project's general characteristics dictate the impacts on state and federal wetlands. The project area, existing conditions, and general project characteristics are the same under both scenarios; therefore, the analysis approach is not based on one scenario or the other, and accounts for any future development that could occur under the project.

Impact Criteria	Scenario A	Scenario B	EIR Approach
Impact BIO-4: Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	--	--	Same for both scenarios. The project footprint, the presence or absence of wildlife movement corridors and nursery sites, and the project's general characteristics dictate the impacts on wildlife movement corridors and nursery sites. The project area, existing conditions, and general project characteristics are the same under both scenarios; therefore, the analysis approach is not based on one scenario or the other, and accounts for any future development that could occur under the project.
Impact BIO-5: Conflict with any local policies or ordinances protecting biological resources, such as a tree-preservation policy or ordinance?	--	--	Same for both scenarios. The project footprint and general characteristics dictate the potential conflicts with local policies and ordinances. The project area and general project characteristics are the same under both scenarios; therefore, the analysis approach is not based on one scenario or the other, and accounts for any future development that could occur under the project.
Impact BIO-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?	--	--	Same for both scenarios. There is no applicable habitat conservation plan covering the project site; therefore, the analysis approach is not based on one scenario or the other, and accounts for any future development that could occur under the project.

3.2.3.4 Impacts and Mitigation Measures

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 California Department of Fish and Wildlife or U.S. Fish and Wildlife Service (Less than Significant with Mitigation).

As previously noted, review of the CDFW CNDDB list, USFWS IPaC list, and the CNPS list show special-status species that have the potential to occur in the project area. CNDDB shows 77 special-status species (CDFW 2025), the IPaC list shows 17 special-status species (USFWS 2025a), and the CNPS list (CNPS 2025) shows two special-status plant species. The lists include, but are not limited to: California Ridgway's rail, Alameda song sparrow, American peregrine falcon, California red-legged frog, San Francisco gartersnake, hoary bat, Townsend's big-eared bat, Stage's dufourine bee, Mission blue butterfly, and callippe silverspot butterfly. The complete lists are included as Appendix 3.2-1, *Biological Database Queries*.

The project site and surrounding area are characterized by dense urban development and are void of natural land cover or communities. There are no critical habitats in the project site under USFWS jurisdiction (USFWS 2025a), nor wetlands (USFWS 2025b). On July 19, 2024, an ICF biologist conducted a pedestrian field survey of the project site to assess land cover types and the site's suitability to contain sensitive biological resources or habitat. The field survey indicated that there is no habitat at the project site or in the immediately surrounding areas for any of the listed plant and animal species, with the exception of the American peregrine falcon (discussed below). The CNDDB list includes the quadrangle for South San Francisco, which includes San Bruno Mountain, an open space area with native habitat for sensitive species such as the San Bruno Mountain manzanita (*Arctostaphylos imbricata*). The project would have no impact on San Bruno Mountain. The IPaC list includes wetland habitat and the San Francisco Bay, and there would be no impact near or on wetlands or the San Francisco Bay from the project. The closest wetland is approximately 0.67 mile southeast of the project site. As such, the project site does not support any special-status species or habitat.

As noted above, the CNDDB database indicates that special-status bats known to occur in the region include Townsend's big-eared bat and hoary bat (CDFW 2025). Pallid bat, which CDFW designates as a species of special concern, is also known to occur in the region (Appendix 1-1, *Notice of Preparation and Comments Received on the Notice of Preparation, CDFW Comment Letter*). No evidence of bats was observed during the July 2024 site visit. Typical bat roosting habitat includes older, vacant buildings and large trees with cavities, neither of which occur on the project site. Furthermore, as an active shopping mall adjacent to a Bay Area Rapid Transit (BART) station and a major freeway, the project site is characterized by a high level of human activity and disturbance, which typically deters bats from roosting onsite. As such, the project site is not expected to support roosting habitat for special-status bats.

Onsite buildings and vegetation, including trees, may provide suitable nesting habitat for American peregrine falcon as well as resident and migratory birds that are protected under state (California Fish and Game Code Sections 3503, 3503.5, and 3513) and federal (e.g., MBTA) laws. The project proposes to demolish most of the existing onsite structures and remove all of the 114 existing trees onsite, including some mature trees (Walter Levison, Consulting Biologist 2024). If the proposed project is implemented during the nesting season (February 15–Sept 15), construction activities including tree removal and structure demolition could affect nesting birds, resulting in take (i.e., direct mortality of adult or young, the destruction of active nests, disturbance of nesting adults, with associated nest abandonment and/or loss of reproductive effort), which would be a significant impact.

Implementation of **Mitigation Measure BIO-1** would reduce these potentially significant impacts on nesting birds by ensuring that project activities would not significantly affect nesting resident or migratory birds. Mitigation Measure BIO-1 supersedes Mitigation Measure BIO-1.1 in the Housing Element Initial Study/Mitigated Negative Declaration (IS/MND) and is equally as effective in mitigating impacts on nesting birds at the project site. Therefore, this impact would be ***less than significant with mitigation***.

Mitigation Measures

Mitigation Measure BIO-1-A: Preconstruction Nesting Bird Surveys and Buffer Areas.

The applicant shall implement the following measures prior to the commencement of any demolition or construction activities on the project site that meet the criteria set forth below.

a. To the extent feasible, conduct initial activities, including, but not limited to, vegetation removal, tree removal, ground disturbance, building or parking lot demolition, site grading, and other construction activities, which may compromise breeding birds or the success of their nests outside the nesting season (February 15–September 15).

b. If construction occurs during the bird-nesting season, a qualified wildlife biologist[1] shall conduct a nesting bird preconstruction survey within 14 days prior to the start of construction or demolition at areas within the project site where construction or demolition activities have not previously occurred, or after any pause in construction or demolition activities of 14 days or more in areas where construction or demolition activities have not previously occurred. The survey shall be performed within the following radii of the applicable construction area in order to locate any active nests: 100 feet for passerine species, 300 feet for raptor (birds of prey) species, 500 feet for peregrine falcon, and shall be in areas that constitute suitable habitat for these species.

c. If active nests are located during the preconstruction nesting bird survey, a qualified biologist shall determine if the schedule of construction activities could affect the active nests; if so, the following measures would apply:

    1. If the qualified biologist determines that construction is not likely to affect an active nest, construction may proceed without restriction; however, a qualified biologist shall regularly monitor the nest at a frequency determined appropriate for the surrounding construction activity to confirm there is no adverse effect. Spot-check monitoring frequency would be determined on a nest-by-nest basis, considering the particular construction activity, duration, proximity to the nest, and physical barriers that may screen activity from the nest.

    2. If it is determined that construction may cause abandonment of an active nest, the qualified biologist shall establish a no-disturbance buffer around the nest(s), and all project work shall halt within the buffer to avoid disturbance or destruction until a qualified biologist determines that the nest is no longer active. Typically, buffer distances are a minimum of 100 feet for passerines and 300 feet for raptors; however, the buffers may be decreased if an obstruction, such as a building, is within line-of-sight between the nest and construction.

    3. Modifying nest buffer distances, allowing certain construction activities within the buffer, and/or modifying construction methods in proximity to active nests shall be approved by the qualified biologist and in coordination with the Planning Division. To the extent necessary to remove or relocate an active nest, such removal or relocation shall be coordinated with the Planning Division, and the removal or relocation shall be in compliance with the California Fish and Game Code and other applicable laws.

[1] The experience requirements for a qualified biologist shall include a minimum of 4 years of academic training and professional experience in biological sciences and related resource management activities, and a minimum of 2 years of experience conducting surveys for each species that may be present within the project site.

4. Any work that must occur within established no-disturbance buffers around active nests shall be monitored by a qualified biologist. If adverse effects in response to project work within the buffer are observed and could compromise the nest, work within the no-disturbance buffer(s) shall halt until the nest occupants have fledged.
5. Any birds that begin nesting within the project site and survey buffers amid construction activities are assumed to be habituated to construction-related or similar noise and disturbance levels. Work may proceed around these active nests subject to Measure C.2 above.

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, or regulations or by California Department of Fish and Wildlife or U.S. Fish and Wildlife Service (No Impact).

The project site and surrounding area are completely developed, composed entirely of retail, industrial, warehouse, and residential uses; surface parking lots; and roadways. No riparian habitat or other sensitive natural community are present on the project site or in the immediate vicinity. The nearest wetland is 0.67 mile southeast of the project site and appears to be a freshwater emergent wetland (USFWS 2025b). The project site is separated from this habitat by dense urban development, including multiple paved roads, buildings, and railroad tracks; thus, the proposed project would not affect tidal wetlands. Therefore, the proposed project would have ***no impact*** on riparian habitat or other sensitive natural communities. No mitigation is required.

Impact BIO-3: The project would not 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 (No Impact).

As discussed previously, no state or federally protected wetlands or other jurisdictional waters are present on the project site or in the immediate vicinity. Therefore, the proposed project would have ***no impact*** on state or federally protected wetlands. No mitigation is required.

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 with Mitigation).

No wetlands or running waters are present on or within the vicinity of the project site; therefore, the proposed project would have no impact on the movement of fish species. As discussed under Impact BIO-1, existing buildings, structures, and trees on the project site could provide nesting habitat for resident and migratory birds; therefore, the proposed project has the potential to affect a native wildlife nursery site, which would be a potentially significant impact. Implementation of **Mitigation Measure BIO-1** would reduce this potentially significant impact on nesting resident and migratory birds by ensuring that project activities would not significantly affect the use of native wildlife nursery sites. Therefore, this impact would be ***less than significant with mitigation***.

Wildlife corridors are described as pathways or habitat linkages that connect discrete areas of natural open space that would otherwise be separated or fragmented by topography, changes in vegetation, or natural or human-made obstacles, such as urbanization. Because the project site and surrounding area are developed, it does not connect directly to areas of natural open space. Given that the area surrounding the project site is heavily urbanized, large numbers of birds are not expected to be flying over the project site at altitudes low enough for substantial bird-strike mortality to occur. Any common urban-adapted species that currently move through the project site would continue to be able to do so during and following project construction. Notwithstanding, operation of the proposed project would include the use of new lighting and construction of buildings with potentially reflective surfaces. Although the proposed project would remove and replace existing structures, the new lighting and new surfaces could misdirect or confuse migratory birds, resulting in disruption of natural behavioral patterns and possible injury or death from exhaustion or collisions with buildings, which would be a significant impact. The potential for these types of impacts could be heightened because of the project site's proximity to San Bruno Mountain and the San Francisco Bay. Implementation of **Mitigation Measure BIO-4-A** and **Mitigation Measure BIO-4-B** would reduce potentially significant impacts on the native resident or migratory birds by ensuring that project activities would not significantly affect resident or migratory bird movement or use of the project site as a wildlife corridor. Therefore, this impact would be ***less than significant with mitigation***.

Mitigation Measures

Mitigation Measure BIO-4-A: Lighting Measures to Reduce Impacts on Birds.

During design, the applicant shall ensure that a qualified biologist experienced with bird strikes and building/lighting design issues shall identify lighting-related recommended measures to minimize the effects of the building's lighting on birds, which may include the following and/or other measures.

a. Use strobe or flashing lights in place of continuously burning lights for obstruction lighting (lighting designed to illuminate tall buildings or high-rise structures that may interfere with air traffic). Use flashing white lights rather than continuous light, red light, or rotating beams.

b. Install shields onto light sources not necessary for air traffic to direct light toward the ground.

c. Extinguish all exterior lighting (i.e., rooftop floods, perimeter spots) not required for public safety as determined by the City.

d. When interior or exterior lights must be left on at night, the operator of the buildings shall examine and adopt feasible alternatives to bright, all-night, floor-wide lighting, which may include installing motion-sensitive lighting, using desk lamps and task lighting, reprogramming timers, or using lower-intensity lighting.

e. Windows or window treatments that reduce transmission of light out of the building shall be implemented to the extent feasible.

The applicant shall incorporate such measures into the building's design and operation to the extent feasible, subject to design review and approval by the City.

Mitigation Measure BIO-4-B: Building Design Measures to Minimize Bird-Strike Risk.

During design, the applicant shall ensure that a qualified biologist experienced with bird strikes and building/lighting design issues identify recommended measures related to the external appearance of the building to minimize the risk of bird strikes, which may include the following and/or other measures.

a. Minimize the extent of glazing.

b. Use low-reflective glass and/or patterned or fritted glass.

c. Use window films, mullions, blinds, or other internal or external features to "break up" reflective surfaces rather than having large, uninterrupted areas of surfaces that reflect and, thus, to a bird may not appear noticeably different from, vegetation or the sky.

The applicant shall incorporate such measures into the building's design and operation to the extent feasible, subject to design review and approval by the City.

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).

The proposed project would be consistent with local general plan policies applicable to biological resources, including applicable policies in the *San Bruno General Plan*, provided in Section 3.2.2.1, *Regulatory Setting*. With the implementation of Mitigation Measure BIO-1-A, as discussed above, the project would be compliant with Policy ERC-17, regarding tree removal and bird surveys; analysis included in this EIR provides the results of presence/absence biological surveys for sensitive plant and animal species in compliance with Policy ERC-16; and Policies ERC-10 and ERC-11 relate to landscaping and planting at the project site; the project design guidelines prioritize the use of native and drought-tolerant plants and the avoidance of invasive plant species.

Local policies and ordinances for protecting biological resources located within the City of San Bruno include the Streets, Sidewalks, and Rights-of-Way Ordinance (Title 8) in the San Bruno Municipal Code, which addresses heritage trees, street trees and other plantings. A tree inventory was performed by Walter Levison, Consulting Arborist in February 2024. See Appendix 3.2-2, *Tree Inventory*. A total of 117 trees were documented in the tree inventory, 49 of which are protected (native tree species) under the City's ordinance. During the field survey conducted by an ICF biologist on July 19, 2024, it was determined that three trees were no longer onsite; therefore, the total number of onsite trees is 114 (including the 49 protected trees). The definition of heritage trees for the City of San Bruno is defined as 6-inch diameter at breast height (DBH) of oak (*Quercus*) species, Monterey pine (*Pinus radiata*), coast redwood (*Sequoia sempervirens*), California bay laurel (*Umbellularia californica*), and California buckeye (*Aesculus californica*) and 10-inch DBH of all other tree species.

The proposed project would remove all 114 trees on the project site, including the 49 protected trees. However, if any of the trees are salvageable, they would not be removed. Of the 49 protected trees, there are 10 holly oaks (*Quercus ilex*), five coast live oaks (*Quercus agrifolia*), one oak hybrid (*Quercus* spp.), and two Monterey pines (*Pinus radiata*). All the rest of the trees are nonnative trees, which include London plane tree (*Platanus x hispanica*), Lombardy poplar (*Populus nigra 'Italica'*), Italian stone pine (*Pinus pinea*), Australian brush cherry (*Syzygium paniculatum*), silk oak (*Gravillea robusta*), and blackwood acacia (*Acacia melanozylon*). The applicant would be required to abide by all regulations specified in the San Bruno Municipal Code, which would require the applicant to

obtain permits to remove protected trees, including street trees, and compensate for their removal by planting replacement trees of certain sizes and species or paying in-lieu fees. Street trees removed would require a permit in accordance with San Bruno Municipal Code Section 8.24.070, which protects street trees designated by the director of public works. The project expects to plant approximately 475 trees, all 24-inch box or larger, for a total net increase of 361 trees in the project site.

Based on the above analysis, the proposed project would comply with local policies and ordinances for protecting biological resources, such as a tree-preservation policy or ordinance, ensuring that project activities would not result in an unauthorized impact on a protected tree. Therefore, this impact would be ***less than significant***. No mitigation measures are required.

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 project site is not part of an existing habitat conservation plan (HCP), natural community conservation plan (NCCP), or any other local, regional, or state habitat conservation plan. The nearest area covered by an HCP, the *San Bruno Mountain Habitat Conservation Plan*, is approximately 2.0 miles north of the project site, and construction and operation of the proposed project would have no direct or foreseeable indirect effects on the area covered by that HCP. Therefore, the proposed project would have ***no impact*** on the provisions of an adopted HCP, NCCP, or other approved local, regional, or state habitat. No mitigation is required.

3.2.4 References Cited

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3.3 Cultural Resources

3.3.1 Introduction

This section evaluates the potential impacts on cultural resources that could result from construction and operation of the Tanforan Redevelopment Project (project). This section also describes existing conditions at the project site as well as the regulatory framework for this analysis. Impacts resulting from implementation of the project are also evaluated and feasible mitigation measures, where applicable, are described.

Relevant technical documentation used in this analysis includes the following technical study prepared for the project.

- *The Shops at Tanforan, San Bruno, California, Historic Resource Evaluation*, prepared by ICF, January 2025 (Appendix 3.3-1, *Historic Resource Evaluation*)

No questions or concerns related to cultural resources were raised in the Notice of Preparation (NOP) (Appendix 1-1, *Notice of Preparation and Comments Received on the Notice of Preparation*). The Native American Heritage Commission (NAHC) submitted a comment letter confirming its receipt of the NOP and summarizing general requirements for cultural resource analysis under the California Environmental Quality Act (CEQA). The letter did not raise specific questions or concerns related to the scope of the Draft EIR analysis.

The following definitions are common terms used to discuss regulatory requirements and the treatment of cultural resources.

- *Cultural resources* comprise historical and archaeological resources. It is the term used to describe several different types of places, sites, and objects and includes both precolonial (Native American Indigenous contexts) and historical (postcolonial, diasporas, and Euro-American settler-colonial contexts) archaeological sites; architectural properties such as buildings, bridges, and infrastructure; and resources of importance to Native Americans or other groups of people.
- *Historic properties* is a term defined by the National Historic Preservation Act of 1966 (NHPA) as any precontact site or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places (NRHP), including artifacts, records, and material remains related to such a property.
- *Historical resources* are defined in Public Resources Code (PRC) 5021.1(j) and include, but are not limited to any "object, building, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California." This term is further defined CEQA, for the purposes of determining the significance to archaeological and historical resources, as addressed in Section 3.3.2.1, R*egulatory Setting*, *California Environmental Quality Act*.

3.3.2 Existing Conditions

3.3.2.1 Regulatory Setting

This section summarizes regulations and policies that are relevant to the analysis of the project's potential impacts on cultural resources.

Federal

National Historic Preservation Act

The NRHP was established by the NHPA to help identify and protect properties that are significant cultural resources and is administered by the National Park Service. It is the official comprehensive inventory or list of the nation's historic places worthy of preservation. As defined in 36 CFR 800.16[l][1], the term historic property means "any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the [NRHP] maintained by the Secretary of the Interior. This term includes artifacts, records, and remains that are related to and located within such properties."

Properties that are listed in or eligible for listing in the NRHP are considered eligible for listing in the California Register of Historic Resources (CRHR) and, thus, are significant historical resources for the purpose of CEQA (Guidelines Section 15064.5). Properties may be found eligible for listing or listed in the NRHP if they possess integrity of location, design, setting, materials, workmanship, feeling, and association and that:

A. Are associated with events that have made a significant contribution to the broad patterns of our history; or

B. Are associated with the lives of persons significant in our past; or

C. Embody the distinctive characteristics of a type, period, or method of construction or represent the work of a master or possess artistic value or represent a significant and distinguishable entity whose components may lack individual distinction; or

D. Have yielded, or may be likely to yield, information important regarding prehistory or history (36 CFR Section 60.4).

State

California Register of Historical Resources

PRC Section 5024.1 establishes the CRHR and in 5024.1(a) describes it as "an authoritative guide in California to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change." The CRHR automatically includes all properties listed in or determined eligible for listing in the NRHP, as well as some California Historical Landmarks and California Points of Historical Interest. Title 14 of the California Code of Regulations (CCR) Section 4852, governs eligibility for listing in the CRHR and its sets forth the criteria for evaluating significance and the historical integrity of that significance.

To be eligible for listing in the CRHR, a resource must have significance at the local, state, or national level under one or more of the following four criteria.

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

If a resource is found to have significance through application of one of the four associative criteria, then the integrity of that significance must be evaluated. Integrity is defined in CCR Section 4852(c) 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." Resources are required to "retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance" [CCR Section 4852(c)]. Integrity is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association; it must be judged with reference to its particular criterion or criteria of significance.

California Environmental Quality Act

CEQA requires a lead state agency to consider the impacts of a project on both historical resources and unique archaeological resources. Under CEQA Guidelines Section 15064.5(a), the following resources are considered historical resources.

1. A resource listed in or determined by the State Historical Resources Commission to be eligible for listing in the [CRHR] (PRC Section 5024.1);
2. A resource included in a local register of historical resources, as defined in section 5020.1(k) of the [PRC] or identified as significant in a historical resource survey meeting the requirements of section 5024.1(g) of the [PRC], shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant;
3. Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be 'historically significant' if the resource meets the criteria for listing on the [CRHR];
4. The fact that a resource is not listed in, or determined to be eligible for listing in the [CRHR], not included in a local register of historical resources (pursuant to section 5020.1[k] of the [PRC]), or identified in an historical resources survey (meeting the criteria in section 5024.1[g] of the [PRC]) does not preclude a lead agency from determining that the resource may be a historical resource, as defined in PRC Section 5020.1(j) or 5024.1.

CEQA Guidelines Section 15064.5(b) provides specific guidance for determining the significance of impacts on historical resources. CEQA Guidelines Section 15064.5(b) states that "a project with an effect that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment." This section provides specific guidance for determining the significance of impacts on historical resources. Substantial adverse changes include physical changes to both a historical resource and its immediate surroundings.

CEQA Statutes Section 21083.2, Archaeological Resources: Determination of Effect of Project; EIR or Negative Declaration; Mitigation Measures, and CEQA Guidelines Section 15064.5(c), Determining the Significance of Impacts to Archaeological and Historical Resources, provide further definitions and guidance for archaeological sites and their treatment. CEQA Guidelines Section 15064.5(c) and CEQA Statutes Section 21083.2 require agencies to determine whether projects would have effects on "unique archaeological resources."

CEQA Guidelines Section 15064.5(c) specifies how CEQA applies to archaeological sites and distinguishes between archaeological sites that are historical resources, unique archaeological resources, or neither. CEQA Statutes Section 21083.2(g) defines a unique archaeological resource as

> …an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:
>
> 1. Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information;
> 2. Has a special and particular quality, such as being the oldest of its type or the best available example of its type; or
> 3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

CEQA Guidelines Sections 15064.5(d) and (e) specify responsibilities in the event of an accidental discovery of human remains, and the treatment of Native American human remains, that are found or likely to be found within a project site.

Tribal Cultural Resources

Tribal cultural resources were identified as a distinct CEQA environmental category with the adoption of Assembly Bill (AB) 52 (CEQA Statutes Section 21074). AB 52 sets up an expanded consultation process, following CEQA Statutes Section 21080.3.1(b). Archaeological sites, including those that qualify as historical resources (PRC 5021.1[j]), unique archaeological resources (PRC Section 21083.2[g]), and non-unique archaeological resources (CEQA Statutes Section 21083.2[h]), may qualify as Tribal cultural resources, if they conform with the criteria of CEQA Statutes Section 21074(a). Tribal cultural resources are analyzed in Section 3.15, *Tribal Cultural Resources*, of this EIR.

Health and Safety Code Section 7050.5: Human Remains

In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, Section 7050.5 of the California Health and Safety Code states that "there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the remains were discovered has determined" whether they are subject to the coroner's authority. Further in the section states that "the coroner shall make his or her determination within two working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains." Additionally, the code states that "If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes the human remains to those of a Native American, or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission."

Public Resources Code Section 5097.98(a): Notification of Most Likely Descendant

PRC Section 5097.98 states that the NAHC, upon notification of the discovery of Native American human remains, pursuant to Health and Safety Code Section 7050.5(c),

> …shall immediately notify those persons it believes to be most likely descended from the deceased. With permission of the landowner or a designated representative, the most likely descendant may inspect the site of the discovery of the Native American human remains and may recommend to the owner or the person responsible for the excavation work means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods.

The most likely descendants "shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site."

Public Resources Code Section 5097.993: Native American Historic Resource Protection Act

PRC Section 5097.993(a)(1) establishes that, unless it is an action listed in PRC 5097.993(b).

> …a person who unlawfully and maliciously excavates upon, removes, destroys, injures, or defaces a Native American historic, cultural, or scared site, that is listed or may be eligible for listing in the [CRHR] pursuant to Section 5024.1... is guilty of a misdemeanor if the act was committed with specific intent to vandalize, deface, destroy, steal, convert, possess, collect, or sell a Native American historic, cultural, or sacred artifact, art object, inscription, feature, or site, and the act was committee as follows: (A) On public land. (B) On private land, by a person, other than the landowner…

Per PRC 5097.994(a) a person who violates PRC Section 5097.993(a) "is subject to a civil penalty not to exceed fifty thousand dollars ($50,000) per violation."

Local

The City of San Bruno does not maintain a citywide historic resource inventory, nor is a local historic preservation ordinance currently in effect.

San Bruno General Plan

The *San Bruno General Plan* (City of San Bruno 2009), adopted March 24, 2009, outlines a vision for the long-range physical and economic development of the community through 2025. The General Plan land use designations, policies, and implementing actions will guide local officials in making decisions on private development proposals and public facilities. The Land Use Element states that the City is participating in the Grand Boulevard Initiative, an initiative to revitalize communities along the El Camino Real corridor into vibrant, people-friendly places (Joint Venture Silicon Valley 2025). As part of this program, "cities are encouraged to design for neighborhoods that include high quality building designs and diverse land uses, preserve historic buildings and places, and enhance our economic and cultural diversity, with the broad involvement of residents, workers and location businesses." The following guiding policy from the Land Use Element is relevant to cultural resources and the project.

- **Grand Boulevard Initiative: 7.** Preserve and accentuate unique and desirable community character and the existing quality of life in adjacent neighborhoods.

The *San Bruno General Plan* includes the following policies that were adopted to avoid or mitigate environmental impacts on cultural resources and are applicable to the project (City of San Bruno 2009).

- **ERC-F:** Preserve and enhance historic and cultural resources within the city, particularly within the historic Downtown area.
- **ERC-35:** Develop criteria for designation of local historic or cultural resources. Designation may not be based solely on the age of a resource, but rather special qualities, detailing, people, or events associated with it. Resources may also include special signage and/or landmarks known to city residents.
- **ERC-36:** Preserve historic structures and resources during reuse and intensification within the city's older neighborhoods.
- **ERC-37:** Designate the vicinity of Taylor Avenue, San Mateo Avenue, and El Camino Real as the beginning of the State Highway System as a historic landmark with a marker.
- **ERC-38:** Work cooperatively with the developers of The Shops at Tanforan to identify the site as the former Tanforan Racetrack as a historic landmark with a marker.
- **ERC-39:** Continue to protect archaeological sites and resources from damage. Require that areas found to contain significant indigenous artifacts be examined by a qualified archaeologist for recommendations concerning protection and preservation.
- **ERC-40:** Ensure that new development adjacent to historic structures is compatible with the character of the structure and the surrounding neighborhood.

3.3.2.2 Environmental Setting

This section describes the environmental setting related to cultural resources for the project. Because of the relationship between cultural resources and Tribal cultural resources, some information presented in this discussion is also relevant to Tribal cultural resources and, therefore, is referenced in Section 3.15, *Tribal Cultural Resources*.

Historic Setting

Precontact Setting

Human occupation in Northern California extends back to time immemorial, and the archaeological record extends to at least 9,000 to 11,500 years, with Native American occupation and use of the Bay Area extending back within the archaeological record more than 5,000 to 8,000 years and possibly longer. Rising sea levels about 5,000 to 7,000 years ago and marshland infilling along estuary margins from about 7,000 years ago onward have obscured evidence of early occupation. The extent of shorelines and the locations of marshlands and creeks within the region have changed over the past 6,000 years because of natural factors, urban development, agriculture, and other settler-colonial projects. It has been proposed that the absence of sites is largely a function of urban and agricultural development, long-term trends in sea-level rise, shoreline erosion, and localized subsidence in the region, which are likely to have obscured or destroyed early coastal sites with datable materials (Byrd et al. 2010).

Archaeological research in the Bay Area has been interpreted with the use of several chronological schemes, based on stratigraphic differences and cultural traits. The initial classification sequence used three horizons, Early, Middle, and Late Horizon, to designate both chronological periods and social change, based on stratigraphic patterns and an analysis of grave goods to explain local and regional cultural change from about 4,500 years ago to European contact. This classification scheme has been revised, although the prior nomenclature (Early, Middle, and Late Horizon) is still in common use (Fredrickson 1994). Moratto (1984) suggests that the Early Horizon dates from circa

3,000/3,500 to 4,500 years ago, the Middle Horizon dates from circa 1,500 to 3,500 years ago, and the Late Horizon dates from circa 250 to 1,500 years ago (Moratto 1984).

Hylkema (2002) has presented a four-period chronological framework for the northern Santa Clara Valley/southern Bay Area and provided details regarding the environment and chronology for selected archaeological sites from the southern Bay Area and peninsula (Hylkema 2002). Early Native American use of the project area was heavily influenced by the presence of various seasonal creeks and marshlands around San Francisco Bay as well as the foothills to the east. Creeks provided a year-round source of freshwater and riparian resources, while the foothills provided access to nuts, seeds, game, tool stones, and other resources. San Francisco Bay and seasonal bodies of water would have been sources of fish, waterfowl, and riparian vegetation.

Precolonial archaeological sites in the general vicinity represent habitation sites, including villages; temporary campsites; stone tool and other manufacturing areas; quarries for stone procurement; cemeteries, typically associated with large villages; isolated burial sites; rock art locations; bedrock mortars or other milling feature sites; and trails. Sites in the general area appear to have been selected for relative accessibility, protection from seasonal flooding, and proximity to a diversified resource base. Most of the precontact shellmounds and associated sites in the area are situated at the ecotone (boundary) between salt marsh and alluvial plain ecozones.

Ethnographic Setting

The project site is within the ancestral homelands of Indigenous people who spoke the Urebure Ramaytush dialect of the Ohlone (also called Costanoan) language group. The Tribes located around the San Francisco Bay spoke dialects of at least five languages. While most ethnographers have treated these languages as separate cultural groups, this approach has also been criticized as being too simplistic (Milliken 1995:24). The territory of the Ohlone people, who were referred to as the Costanoans by the Spanish because they lived along the coast, extended from the Golden Gate Bridge to just below the City of Carmel. They also occupied several inland valleys (Levy 1978). While living within the mission system, the Ohlone commingled with other groups, including the Esselen, Yokuts, Miwok, and Patwin. Mission life was devastating to the Ohlone population (Milliken 1995). By the time of secularization of the California missions, the Ohlone population numbered less than 2,000 due to European settler-colonial pressures and genocide (Cook et al. 1943).

Spanish-Period Setting

The Spanish Period in the San Francisco Bay Area began in 1769 with the initial historic exploration of the region and ended in 1821 when the area became part of newly independent Mexico. Between 1769 and 1776, several Spanish expeditions passed through Ohlone territory in the region, including the Fages (1770 and 1772) and Juan Bautista de Anza (1775/1776) expeditions. On November 4, 1769, a Spanish expedition led by Gaspàr de Portolà crossed the Coast Ranges on its way north from Monterey. This party encountered Indigenous Californians in the Bay Area for the first time at the village of Ssalson (near modern-day San Mateo). According to Juan de Crespì, a diarist, this meeting was amicable, and the people of Ssalson took them into their village and feasted with them (Milliken 1995:32). Captain Bruno Heceta traveled along the western shore of the San Francisco Bay in 1775 and named the mountain at the northern end of the Santa Cruz range Mount San Bruno, after his patron saint. The City of San Bruno was later named after that mountain (City of San Bruno 2024a). Government policy in northwestern New Spain focused on establishing presidios (forts), missions, and pueblos (secular towns). No Spanish-Period structures or features are known to have been present on or adjacent to the project site (Hendry and Bowman 1940).

Mexican-Period Setting

The Mexican Period in the San Francisco Bay Area began in 1822 when Mexico gained control of the region from Spain and ended in 1848, with the conclusion of the Mexican–American War. Under the Mexican government, secularization of the mission lands began in earnest in 1834. The Indigenous Californians moved away from the mission centers, some were given rancherias from the mission lands, many were assimilated into Californio and later American society, and still more "worked against and within colonial systems to maintain residency and autonomy in their ancestral homelands in central California" (Schneider and Panich 2019:21). Most of the former mission land was divided among loyal Mexican subjects (Californios) through land grants from the Mexican governor. Ranchos were established with agriculture and cattle ranching taking place by the citizens of the new Mexican state. Some Indigenous Californians were given jobs as manual laborers (vaqueros) or domestic servants on Mexican ranchos or, later, American cattle ranches (Schneider and Panich 2019).

During the Mexican Period, in the 1820s the land of what is now the City of San Bruno was granted to José Antonio Sanchez by Governor José Castro. The 14,639-acre Mexican land grant was termed the Buri Buri (a reference to the Urebure village, which was located along the banks of San Bruno Creek) or Sanchez Rancho. Cattle ranching and farming in the area continued. The Rancho was inherited by his children, who later sold or otherwise lost the land due to the legal process that existed at the time after California became a part of the United States (City of San Bruno 2024b). No Mexican-period structures or features are known to have been present on or adjacent to the project site.

American-Period Setting

California became a United States territory following the conclusion of the Mexican–American War in 1848 and the Treaty of Guadalupe Hidalgo. California was admitted as a state in 1850. The gold rush, beginning in 1848, brought a massive influx of immigrants to California. Rancho Buri Buri/Sanchez was largely purchased by Darius Mills, who was the founder of the Bank of California. A railroad was constructed through the San Bruno area in 1863, connecting San Francisco and San Jose.

Historic Context

This section presents the historic context for the potential historic properties in the project area. The historic context explores the major historic events and development trends of the site and surrounding area of San Bruno, as well as the extant built resources typology. Material for this section was also included in the associated historic resource evaluation (HRE) included in Appendix 3.3-1, *The Shops at Tanforan, San Bruno, California, Historic Resource Evaluation*.

As discussed in the introduction to Chapter 3, the Housing Element Update IS/MND evaluated the development of up to 1,000 residential dwelling units on the project site at a program level. Mitigation Measure CUL-1.1 requires any future project-level CEQA analysis of the project site to prepare an HRE for the project site. This analysis and the associated HRE included in Appendix 3.3-1 fulfill that mitigation requirement.

Site History

In 1899, the first Tanforan Racetrack viewing stands and racetrack was built between El Camino Real and the Southern Pacific railroad tracks in San Bruno. The racetrack was connected to transit systems. The #40 Interurban Trolley Line was adjacent to the racetrack's first viewing stands, which were then on the east side of the racetrack, facing west. The #40 Interurban Trolley Line ran from San Francisco to San Mateo from 1903 to 1949 (Fredericks 2003:23,28).

The Tanforan Racetrack attracted horse racing seasonally and was an economic boost for the City and residents of San Bruno. In 1917, the grounds were used to pitch tents and train the California Grizzlies (a regiment of the 144th Field Artillery of the U.S. Army) for their anticipated deployment in World War I (San Bruno Public Library 1917). Gambling was outlawed in the 1910s, and the racetrack stands were torn down in 1918. Not long after, in 1923, the second viewing stands of the Tanforan Racetrack were constructed on the west side of the track along El Camino Real, and horse racing began again. Adolph R. Spreckels, a notable California businessman, also financed the construction of a large grandstand and clubhouse. In the late 1930s, the racehorse Seabiscuit was moved to the West Coast, where he began to achieve racing success at the Tanforan Racetrack and other West Coast racetracks (*San Mateo Daily Journal* 2017; Fredericks 2003:24). Seabiscuit became the highest money-winning horse in horseracing in the 1930s and 1940s. Seabiscuit's owner, Charles Howard, used the Tanforan Racetrack as the horse's training track and lived on a ranch in Willits (Fredericks 2003:24).

The Tanforan Racetrack was also the site of notable Bay Area aviation achievements. In January 1910, during an air promotion event, Louis Paulhan attempted the first airplane flight in the San Francisco Bay Area at the Tanforan Racetrack. Thousands watched as Paulhan flew for 8 minutes, soaring to an altitude of 700 feet. Eugene Ely took off from the Tanforan Racetrack in January of the following year. He landed on a 30-by-130-foot platform constructed on the armored cruiser USS Pennsylvania, anchored in San Francisco Bay. Ely's historic flight marked the first carrier landing and take-off, a triumph in the early history of naval aviation (Fredericks 2003:23).

During World War II, the Tanforan Racetrack was closed and used to detain approximately 8,000 Japanese and Japanese-American internees from Northern California before they were moved to more permanent incarceration camps. The Tanforan site was one of 17 temporary "assembly centers" or "detention centers," established by Lieutenant General John L. DeWitt's Public Proclamation No. 4 pursuant to President Franklin D. Roosevelt's Executive Order 9066 in 1942 to remove and imprison anyone deemed a threat on the West Coast and was applied to civilian Japanese-Americans. Existing horse stalls and new, impermanent barracks were used to temporarily detain internees before their relocation to more isolated internment camps (Tanforan Memorial 2023). In 1943, the U.S. Navy took over the facility and used it as a naval base for barracks and sailor assignments in the war effort. Also, during wartime, the Golden Gate National Cemetery developed to the northwest of The Shops at Tanforan complex (Fredericks 2003:29). Congress established the Golden Gate National Cemetery in 1937. The War Department purchased the 161.5-acre tract in 1938 as a cemetery for American veterans. The first burial occurred in 1941, and the official dedication was on Memorial Day in 1942 (Fredericks 2003:28).

Following World War II, John Marchbank, owner of the Tanforan Racetrack since the 1920s, led the remodeling of the track and stands and reopened the racetrack. Seasonal horse racing resumed in the 1940s and 1950s (Fredericks 2003:25). In 1964, a fire destroyed the Tanforan Racetrack.

The site was vacant in the late 1960s as developers and City officials engaged in disputes over the land and the development of a new shopping center. As early as March 1965, developers were in front of the City Planning Department with plans to rezone and redevelop the racetrack property for a commercial and residential complex (San Mateo Times 1965:4, 1966b:31). In 1966, San Bruno officials approved final subdivision maps of the (then called) Tanforan Shopping Center, effectively accepting proposed dedicated streets and a general layout of commercial-only development (San Mateo Times 1966a:79). However, there was debate between the planning commissioners and private developers over issues such as a change to commercial zoning and height variances on the property. The lots were sold among development companies multiple times during the course of the argument (San Mateo Times 1965:4). The final sale to the Hapsmith Company (see below) occurred in March 1968, and the first anchor store—Sears, Roebuck, and Co.—was secured for planned construction by June of the same year (Redwood City Tribune 1965:14; Palo Alto Times 1968:3; San Mateo Times 1968a:25). The Sears, Roebuck, and Co. retail store opened in October 1970, comprising 180,000 square feet of space in a main retail unit, a garden shop, and an automotive center (San Francisco Examiner 1970:57). In 1972, the Tanforan Shopping Center celebrated its grand opening.

History of Modern San Bruno

In 1863, the San Francisco and San Jose Railroad was built along the peninsula through San Bruno. The Southern Pacific Railroad acquired it in 1868. Around this time, the first roadhouse was constructed, the 14-Mile House (later named Uncle Tom's Cabin). The founder of the Bank of California, Darius Ogden Mills, acquired thousands of acres in San Bruno for his estate. The Sneath, Tanfaran (original spelling), and Silva families developed the remaining acreage beyond Mills' land for farms, dairies, and horses.

In the early 1900s, real estate developers began platting land into 25-foot lots for housing sites; San Bruno began developing as a rural community that was accessible to surrounding communities via the El Camino Real, the railroad, the #40 Interurban Line of streetcars, and the slow introduction of the automobile (Fredericks 2003:7). Over 1,400 people moved onto the primarily undeveloped vacant landscape of San Bruno following the earthquake and fire in San Francisco in 1906. In 1914, the City was incorporated as a sixth-class city. San Mateo Avenue became a popular business avenue until the Great Depression stagnated development.

Industry was revitalized in San Bruno with the United States' involvement in World War II: the Tanforan Racetrack was turned into U.S. Navy facilities, the local airport became a U.S. Army airbase, and the only large business manufacturer based in the city, Eitel-McCullough, Inc. (abbreviated as Eimac), became critical to the war effort for the production of vacuum tubes for military equipment (World Radio History 1944:4). In addition to the Tanforan Racetrack, the Navy developed land to the west for personnel barracks and office barracks, and a large recreational complex were constructed at the corner of San Bruno Avenue and El Camino Real. They also constructed ancillary hospital buildings throughout the area (Fredericks 2003:118). Industry and factory work to support the war effort drew thousands of people to San Bruno, thus inundating the housing market and catalyzing a building boom in the city beyond the war years that extended across the peninsula. San Bruno grew from 2 square miles of incorporated area to over 6 square miles of potential homeowners, primarily in the undeveloped western hills. Developers Perry Liebman, George Williams, and Andres Oddstad were among the few who platted and developed the remaining Mills land, in part creating the Crestmoor, Rollingwood, Portolà Highlands, and Pacific Heights neighborhoods (Fredericks 2003:8).

Commercial development increased in San Bruno during the 1970s in tandem with the residential and industrial growth. In particular, many small service businesses, including grocery stores, drug stores, theaters, and light industries increased in the area (Fredericks 2003:8). Larger commercial development followed the rezoning of large lots by private developers, including the Tanforan Shopping Center (now known as The Shops at Tanforan) and the Bayhill Shopping Center. The Bayhill Shopping Center opened in 1974 as the retailing segment of an 80-acre office-hotel-shopping complex at the corner of San Bruno Avenue and Interstate 280 (San Mateo Times 1974:24). A. Epstein and Sons from San Bruno was the architect of the project (San Mateo Times 1973:57). In the 1970s, the subject property and the Bayhill Shopping Center expanded within a period of increased commercial development that included regional shopping centers on redeveloped large land plots and small service businesses on historically commercial corridors.

In December 1997, the railroad dating to the 1860s was removed, and the Bay Area Rapid Transit (BART) system was constructed through San Bruno (Fredericks 2003:123). In June 2000, construction began on a BART tunnel for electric trains. In June 2003, the San Bruno BART station commenced operation (Fredericks 2003:124).

Regional Shopping Center Property Type

Regional shopping centers are a product of American retail's evolution in the twentieth century. Regional shopping centers are typically plotted on large lots, cater to automotive convenience, and are located near residential areas. The construction of the regional shopping centers generally paralleled residential patterns of suburban sprawl in suburban areas across the country. The historical roots of this property type can be found in nineteenth-century department stores located in urban areas.

The first department stores emerged in nineteenth-century cities as large stores selling a variety of goods in specialty sections. Introducing light, color, and music to traditional dry goods and retail stores, department stores transformed ordinary trade into occasions for pleasure and spectacle, concentrated at big retail stores in urban areas (Howard 2015:6). The construction of ornate department stores began in the late nineteenth century and continued through the early twentieth century, as retail remained centers of social activity in local communities and a growing middle class with increased spending power shopped more excessively.

By World War I, a national department store industry was in place, comprising individual merchants, department store executives, and their trade organizations. The development of department stores as major economic drivers and one-stop shops benefited from and helped drive urban growth from the late nineteenth to early twentieth centuries (Howard 2015:3). In addition, as early as the 1930s, standardization of department stores transformed local retail stores into national chains (large companies with numerous retail locations across the country) with product and aesthetic uniformity (Hardwick 2004:3).

Department stores evolved with the major suburbanization movements that occurred after World War II. Department store popularity helped shift shopping, a reflection of economic prosperity, from downtown cores (Howard 2015:3). After World War II, retail developments increased in size and scale as malls and urban renewal plans used larger areas of land, and retail shopping among middle class Americans grew exponentially. In the 1950s, suburban growth and the ubiquity of automobiles shifted the seat of economic prosperity from department stores located in urban areas to suburban areas, and the development of the regional shopping center typology began. With the 1956 opening of the Southdale Center in Edina, Minnesota, the architect Victor Gruen's designs developed the

concept of what came to be the suburban mall: indoor, climate-controlled retail "anchored" by department stores and adjacent to a variety of stores. (Gruen's contributions to the property type and role as the subject property's architect are described in more detail below.) Anchor department stores, as they came to be known, were popular national department stores meant to draw their existing consumer base to the regional shopping center (Lange 2022:44). Regional shopping centers of the 1950s and 1960s were characterized by enormous complexes (often 60 or more acres), buildings encircled by parking lots capable of holding anywhere between 3,000 and 8,000 cars, and unorthodox building configurations with stores opening outward toward landscaped, pedestrian walkways (Longstreth 2010:186). Following Gruen's prototype, the shopping center typology was copied and evolved in suburban areas across the country from the mid-1950s to the 1970s. By the 1970s, the regional shopping center typology was developing into the "mall" with a multi-level, inward-facing enclosed space with an average of two-anchor department stores and a mix of commercial tenants (Comras 2018). As a regional shopping center constructed in the mid-1970s, The Shops at Tanforan is a late example of this regional shopping center type.

A substantial number of large-scale mergers of department store chains took place in the 1980s, following the expansion of department store national chains and the development of the regional shopping center typology. The consolidation of companies coincided with the loss of historic department stores in both small towns and urban centers throughout the late twentieth century. San Francisco and New York are among the few cities that maintained historic central commercial districts with long-standing department stores. Most other downtowns have lost their department stores and have transitioned into leisure and tourism centers. Generally, the number of department stores in urban areas lessened as the number of regional shopping centers in suburban areas rose in the mid-twentieth century. By the late twentieth century, regional shopping centers, like its predecessors, were eclipsed by a new retail building typology in American retail's evolution: the discount big-box store (Howard 2015:3-4).

Developer History: Hapsmith Company

After a complex turnover of landownership and rejected project proposals and permits, the Hapsmith Company purchased the vacant site that became The Shops at Tanforan. Hap Smith was a well-known Beverly Hills developer and President of the Hapsmith Company. The Shops at Tanforan was the fifth of Hapsmith's 10 planned major shopping centers in Northern California. Others included Fremont, Santa Clara, Sacramento, and San Jose (San Mateo Times 1968b:40). Smith employed the services of architect Victor Gruen and the Ernest W. Hahn Construction Company for contracting work (San Mateo Times 1968b:40). The first anchor store to commit was Sears, Roebuck, and Co. (San Mateo Times 1968b:40). JC Penney and Emporium department stores were the other two department stores to commit soon after 1970 (San Mateo Times 1970:29).

Architect History: Victor Gruen

Victor Gruen (1903–1980) was born Viktor David Grünbaum in Vienna, Austria, and changed his name to Victor David Gruen in late 1938 after emigrating to the United States (Pacific Coast Architecture Database 2023). Victor Gruen's architectural career in the United States spanned from his arrival in Manhattan in 1938 to his return to Vienna in 1968, consistently traveling between New York, Vienna, and Los Angeles in the interim decades (Hardwick 2004:6). In addition to his architectural career, Gruen published three books regarding design and retail—Shopping Towns USA (1960), The Heart of Our Cities (1964), and Centers for the Urban Environment (1973)— and wrote hundreds of articles and presented numerous speeches on consumerism, architecture, urban

planning, and more (Hardwick 2004:5). Gruen's first architectural commission in the United States was completed in association with architect Morris Ketchum. The project was a design for a new department store for the Lederer Company in New York City and was completed in 1939 (Comras 2018; Heiss 2010). Throughout the 1940s, Gruen partnered with his wife Elsie Krummeck, an interior designer, on retail designs in Los Angeles. The pair designed 11 branches of the California clothing chain Grayson's, several department stores for R. H. Macy's, Joseph Magnin, and Milliron's, and commercial buildings for Tishman (Comras 2018). The office of Gruen-Krummeck dissolved with the couple's divorce in 1951, and Gruen founded his own architecture and planning firm, Victor Gruen Associates, the same year (Pacific Coast Architecture Database 2023).

Following World War II, Gruen and his store-modernization theories proliferated across the country and facilitated a new standardization of commercial aesthetics. Gruen's national catalog included large regional shopping centers in suburban areas and, later, ambitious urban renewal projects. The latter projects were in opposition to his earlier work as a result of his distaste for the realities of suburban sprawl and the ubiquitous regional shopping center typology's transformation by developers and various economic and cultural factors (Hardwick 2004:3). In the early 1950s, Gruen designed an open-air shopping center called Northland near Detroit, Michigan. J. L. Hudson, a local, upscale department store chain, developed the shopping center. Northland was designed to be the physical center within surrounding homes, offices, hotels, and stores. J. L. Hudson enforced controls over Gruen's design and quality assurance of an original sculpture installation (Comras 2018).

Gruen's developing vision for the regional shopping center concept in the 1950s was more than just retail stores. He imagined them as mixed-use facilities, with apartments, offices, medical centers, childcare facilities, libraries, and even bomb shelters. In 1952, the Dayton Company commissioned Gruen to build the first indoor, climate-controlled shopping center in Edina, Minnesota. The resulting Southdale Center opened in 1956 and featured a massive center court covered in a skylight and a mix of local stores. The resulting design did not feature the mixed-use ideals of Gruen's theories nor the ornate storefronts and window displays of his early career. Instead, the Southdale Center had an amorphous, boxy massing, only a few exterior windows, and unadorned exterior walls, drawing focus to a pedestrian-focused interior space. Gruen's subsequent malls were mostly based on the Southdale Center design, and features like the center court became a standard feature of the shopping mall building typology (99% Invisible 2015).

During Gruen's active decades as a professional architect, retail and commercial architecture evolved substantially. Gruen's designs exploited this commercial environment to draw in customers and keep them in the store for as long as possible, theorizing that the longer a consumer spent entertained in a retail space, the more money they would spend. Thus, Gruen's store designs used artificial lights, large windows, and contained displays and opulent facades; Gruen's larger regional shopping center typology included grand fountains, intricate sculptures, and gardens (Hardwick 2004:4).

Summary of Known California Environmental Quality Act Historical Resources and Unevaluated Resources

Built-Environment Survey

An ICF architectural historian who meets who the U.S. Secretary of the Interior's Professional Qualifications Standards (36 CFR Part 61) conducted a field survey of the project area to identify historic properties and photograph the existing conditions on September 8, 2023.

ICF prepared an HRE (Appendix 3.3-1, *The Shops at Tanforan, San Bruno, California, Historic Resource Evaluation*) to identify historical resources in the project area. All built resources were also evaluated in accordance with CEQA Guidelines Section 15064.5(a)(2)–(3), using the criteria outlined in PCR Section 5024.1. One designated resource was identified in the project area: California Historical Landmark (CHL) No. 934, Temporary Detention Camps for Japanese Americans-Tanforan Assembly Center in San Mateo County. CHLs No. 770 and above are automatically listed in the California Register of Historical Resources. The analysis also evaluates whether The Shops at Tanforan qualifies as a historical resource under CEQA.

California Historical Landmark No. 934 – Temporary Detention Camps for Japanese Americans-Tanforan Assembly Center in San Mateo County

CHL No. 934, Temporary Detention Camps for Japanese Americans-Tanforan Assembly Center in San Mateo County, is on the project site. Quoting the CHL registration information:

> The temporary detention camps (also known as 'assembly centers') represent the first phase of the mass incarceration of 97,785 Californians of Japanese ancestry during World War II. Pursuant to Executive Order 9066 signed by President Franklin D. Roosevelt on February 19, 1942, thirteen makeshift detention facilities were constructed at various California racetracks, fairgrounds, and labor camps. These facilities were intended to confine Japanese Americans until more permanent concentration camps, such as those at Manzanar and Tule Lake in California, could be built in isolated areas of the country. Beginning on March 30, 1942, all native-born Americans and long-time legal residents of Japanese ancestry living in California were ordered to surrender themselves for detention.

The detention camp at Tanforan was occupied from April 28 to October 13, 1942. The peak population was 7,816 people, and in all, 8,303 Americans of Japanese ancestry were incarcerated at Tanforan (Densho 2024). Based on the documentation, the detention camp is significant under CRHR Criterion 1 as one of the sites of the first phase of Japanese-American internment in California during World War II and the civil rights violations perpetrated by the government against the Japanese-American population. In 1943, the U.S. Navy transformed the site into a base for barracks and sailor assignments, and in the 1940s, John Marchbank remodeled and reopened the site as a seasonal horse racing track (Densho 2024). In 1964, a fire destroyed all remnants of the Tanforan Racetrack. The site was vacant in the mid-to-late 1960s before being redeveloped as a shopping center. At the time of nomination in 1980, the site looked much as it does today. In 1980, there was little extant historic fabric from the period of significance since nearly all of the detention camp had been demolished. As shown in Figure 3.3-1, two memorials are located on the complex's property. Emile Hons and Don Frate, managers of the Tanforan Shopping Center, installed a large bronze statue of Seabiscuit, a racehorse, adjacent to the shopping center building's west elevation in October 1972 (San Mateo Daily Journal 2017; Fredericks 2003:28). The commemorative garden with a bronze plaque is the second.

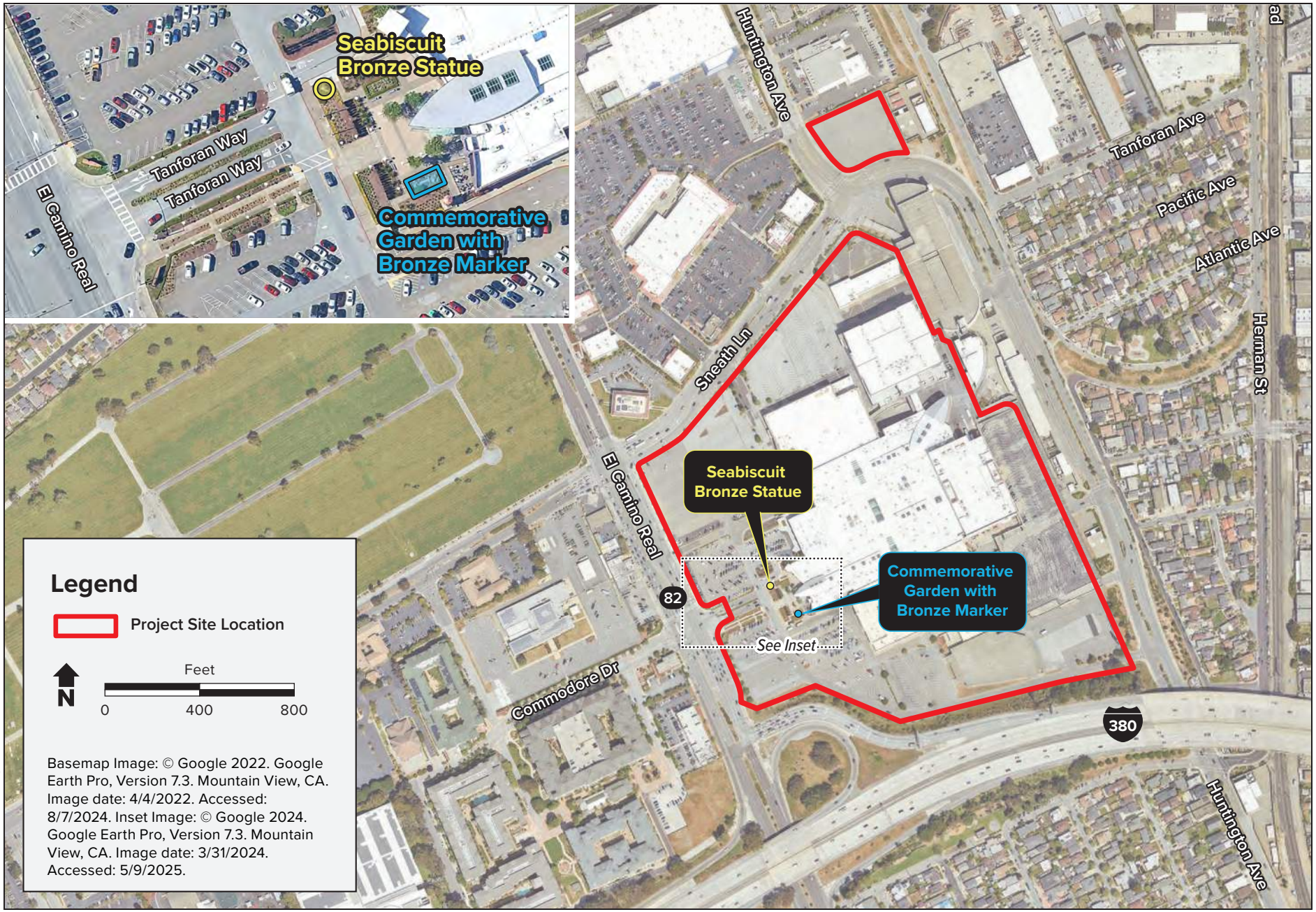

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Figure 3.3-1
Location of Existing On-Site Memorial and Commemorative Garden

Between 2006 and 2007, Breevast U.S., then-property owners, dedicated a 16-by-36-foot plot of land adjacent to the building's southwest entrance for a commemorative Japanese garden designed by renowned landscape artists Isao Ogura and Shigeru Namba. In September 2007, a groundbreaking ceremony for the Tanforan Assembly Center Commemorative Garden took place, aligning with the 65th anniversary of the signing of Executive Order 9066 and the resulting internment of people of Japanese ancestry in the United States (Japanese Cultural and Community Center of Northern California 2007:1). A bronze plaque memorializing the history of the site and its transformation into the Tanforan Assembly Center sits in the commemorative garden.

All sites associated with CHL No. 934 were registered to the California Historical Landmarks program through one nomination form in May 1980, quoted above. The CHL No. 934 designation includes 12 total sites across 10 counties, each with state-funded and privately funded bronze markers to memorialize the extant or demolished remnants of temporary detention camps for Japanese Americans from the historical resource's period of significance. Plaques or markers identifying a registered CHL are at the discretion of the property owner(s) and can be purchased using private funds or a request of an official State plaque. The Temporary Detention Camps for Japanese Americans-Tanforan Assembly Center in San Mateo County was the only CHL No. 934 site in San Mateo County (California Historical Landmarks 2016; California Office of Historic Preservation 2025).

The historical resource retains integrity of location, which is the key aspect of integrity for this type of historical resource in particular—a memorial plaque in a commemorative garden—to convey its significance. However, no visible features of the temporary detention camps remain on the site. The ephemeral nature of the site means other aspects of integrity including that design, materials, workmanship, feeling, association, and setting are not key aspects of integrity for this resource to convey its significance. The character-defining features include its proximity to transportation, its open spaces embodying desirable locations for establishing temporary detention centers, and its relative isolation from other large population centers within California in 1942. The period of significance for the property is April 1942 through October 1942.

The Shops at Tanforan

ICF evaluated the site's current condition from October 2023 to August 2024. A summary of the eligibility evaluation is included below. The entire evaluation on a Department of Parks and Recreation 523 form set is included in Appendix 3.3-1, *The Shops at Tanforan, San Bruno, California, Historic Resource Evaluation*, of this EIR.

The Shops at Tanforan does not appear to be associated with any event(s) significant to the twentieth-century history and commercial development of San Bruno, the regional shopping center property type, the evolution of the Tanforan site, or local state, or national history more broadly (Criteria A/1). The Shops at Tanforan was one of numerous commercial enterprises in San Bruno and one of at least two regional shopping centers of its kind—including the Bayhill Shopping Center, which had its grand opening in 1974. The Shops at Tanforan was one of 10 planned developments by the Hapsmith Company in Northern California and one of many in a national construction boom of regional shopping centers in the 1960s and 1970s (San Mateo Times 1968b:40). The Shops at Tanforan does not appear to be associated with the lives of persons important in our past. The site has a broad and unremarkable association with local community life and economic patterns through a series of revolving tenants with food and general commercial storefronts. Through the range of tenants, no associations were made to rise to a level of significance as most were one among many

locations of regional or national companies (Criteria B/2). The Shops at Tanforan does not appear to embody the distinctive characteristics of a type, period, region, or method of construction, represent the work of an important creative individual, or possess high artistic value. The Shops at Tanforan was one of many regional shopping centers with generic form and aesthetics of the property type. It was neither the first nor the most representative of a new building typology. Similarly, The Shops at Tanforan does not best represent the work of master architect Victor Gruen, as they were constructed late in his career in the United States and neither preeminent nor innovative among his designs. With a utilitarian form, common materials, and lack of style or ornamentation, The Shops at Tanforan does not possess high artistic value (Criteria C/3). Lastly, The Shops at Tanforan does not appear to be significant as a source, or likely source, of important historical information on the history of San Bruno or California, and it does not appear likely to yield important information about 1970s construction methods, materials, or technologies (Criteria D/4).

As such, The Shops at Tanforan does not meet the criteria for listing in the NRHP or CRHR (Appendix 3.3-1, *The Shops at Tanforan, San Bruno, California, Historic Resource Evaluation*) and is not a historical resource for the purposes of CEQA.

Archaeological Setting

The project site is located in the southwest area of San Francisco Bay. It is in the Coast Ranges physiographic province, characterized by a series of northwest-to-southeast-trending mountain ranges and valleys. It is situated along the eastern margin of an uplifted ridge whose southern extent includes the Santa Cruz Mountains. Natural habitats on the San Francisco Peninsula prior to historic development included grasslands and pockets of oak woodland that were populated by a variety of mammals, shorebirds, and marine invertebrates, including the native California oyster (*Ostrea lurida*), bay mussel (*Mytilus edulis*), and bent-nosed clam (*Macoma nasuta*), among others (Broughton 1999). The project site and vicinity would have included small freshwater marshes, tidal sloughs, and salt marshes along the bay margin. Freshwater sources, often linked to human habitation sites, in the project site include San Bruno Creek, which is about 1,000 feet southeast of the project site.

The past or current presence of moist grasslands and riparian forests/willow groves, coupled with tidal marshes in association with existing and former stream channels, appears to be a key element for predicting pre-European contact sites. Researchers have noted that precontact archaeological resources are often within 0.25 mile of flowing water in the Bay Area. The project site is underlain by the Colma Formation (Qc). The Colma Formation is composed of primarily beach sand, colluvium, and alluvium that overly bedrock and has an estimated age of latest Pleistocene, between about 130,000 and 11,000 years old (U.S. Geological Survey 1983; Association Engineering Geologists 2018:55).

As discussed in the introduction to Chapter 3, the Housing Element Update IS/MND evaluated the development of up to 1,000 residential dwelling units on the project site at a program level.[1] As part of that analysis, the Housing Element IS/MND identified areas of archaeological sensitivity on the project site. Those areas are shown in Figure 3.3-2. As shown, the archaeologically sensitive areas generally comprise the areas around the east and west perimeter of the project site, and the parcel north of Sneath Lane.

[1] The project site is Housing Opportunity Site 20 in the adopted Housing Element, and was analyzed as Housing Opportunity Site in the Housing Element IS/MND.

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Figure 3.3-2
Areas Sensitive for Historic-Era Archaeological Resources

3.3.3 Environmental Impact Analysis

This section describes the environmental impacts of the project on cultural resources. It describes the thresholds used to determine whether an impact would be significant and methods used to evaluate the impacts. Measures to mitigate significant impacts are provided, where appropriate.

3.3.3.1 Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, the project would have the potential to have a significant effect on cultural resources if it would result in any of the conditions listed below.

a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

c. Disturb any human remains, including those interred outside of dedicated cemeteries?

3.3.3.2 Methodology and Approach

The methods used to evaluate potential impacts on cultural resources consisted of studying the surrounding area to determine if cultural resources are potentially present and, if so, the potential impacts of the project on those resources. Several methodologies were employed for the purpose of determining the potential presence of cultural resources, such as conducting a records search; analyzing the environmental setting, including proximity to water sources; reviewing the project site's geoarchaeological sensitivity; and reviewing an overview of the historic contexts associated with the project site's development history and existing use.

Records Search

On August 15, 2023, an ICF archaeologist conducted a records search for the project site and a 0.25-mile radius at the Northwest Information Center (NWIC) (NWIC File #23-0214). The NWIC, an affiliate of the Office of Historic Preservation, is the official state repository of cultural resources records and reports for San Mateo County.

The records search conducted for the project site found that no archaeological sites have been identified on the project site or within 0.25 mile of the project site. One previously recorded built-environment resource was recorded within the project site, CHL No. 934 (P-41-000207), as discussed above. Thirty-two previously recorded built-environment resources were recorded within the 0.25-mile radius of the project site. Table 3.3-1 summarizes the previously recorded built-environment resources in the records search project area. A complete list of California historical resource status codes, along with their meaning, is maintained by the Office of Historic Preservation.

Geoarchaeological Sensitivity

ICF conducted a geoarchaeological sensitivity analysis to assess the project site's potential to contain buried precontact archaeological resources. For the purpose of this analysis, the phrase *archaeological sensitivity* is used to characterize a given area's likelihood to contain buried archaeological resources. For example, if an area is defined as having a high degree of buried archaeological sensitivity, it is considered an area with high likelihood for containing archaeological resources.

Table 3.3-1. NWIC Results of Resources in the Project Area

Primary Number	Trinomial	Resource Name	Resource Attributes
P-41-000207	CA-SMA-000209H	Tanforan Assembly Center, Temporary Detention Camp	HP36
P-41-000354		1028 Huntington Avenue East	HP02
P-41-000355		1034 Huntington Avenue East	HP02
P-41-000356		1040 Huntington	HP02
P-41-000357		1052 Huntington	HP02
P-41-000358		1060 Huntington	HP02
P-41-000359		1066 Huntington	HP02
P-41-000360		1074 Huntington	HP02
P-41-000361		1082 Huntington	HP02
P-41-000362		1090 Huntington	HP02
P-41-000363		1140 Huntington	HP02
P-41-000364		1208 Huntington	HP02
P-41-000365		1218 Huntington Avenue East	HP02
P-41-000366		1250 Huntington	HP02
P-41-000367		1262 Huntington Avenue East	HP02
P-41-000368		4 Atlantic Ave	HP02
P-41-000369		8 Buena Vista	HP02
P-41-000393		Poetsch and Peterson Tannery	HP08
P-41-000497	CA-SMA-000357H	C-San Francisco South-C	AH07
P-41-001557		967 Montgomery St	HP02
P-41-001558		957 Montgomery St	HP02
P-41-001559		949 Montgomery St	HP02
P-41-001560		133 Walnut St	HP02
P-41-001562		973 Huntington Ave	HP02
P-41-001563		933 Huntington Street	HP02
P-41-001564		122 Euclid St	HP02
P-41-001565		111 Euclid Ave	HP02
P-41-001566		891 Huntington Ave	HP02
P-41-001567		883 Huntington Ave	HP02
P-41-001568		875 Huntington Avenue; Gobbe Grocery Store	HP06
P-41-002429		Caltrain tracks	HP39
P-41-002441		Four San Mateo Caltrain Concrete Headwall Culverts M.P. 10.44 to 27.90	HP74

ICF reviewed geologic maps, which indicate that the project site consists of Pleistocene-age Colma Formation (Qc), with a total thickness that is unknown, but may extend as much as 60 meters below the ground surface (U.S. Geological Survey 1983). This deposit is friable to loose, fine-to medium-grained sand with subordinate amounts of gravel, silt, and clay. Terminal or late Pleistocene is considered to have an age of between 13,500 and 11,600 Before Present. The general scientific consensus regarding the timing of human occupation in North America is that humans arrived

around 13,500 years ago, or just before the end of the Pleistocene epoch. This indicates that landforms created before this period have limited sensitivity with respect to containing buried archaeological resources.

Based on the above geoarchaeological sensitivity analysis, the project site is considered to have low sensitivity for containing buried precontact archaeological resources.

3.3.3.3 Buildout Scenario Evaluated

As discussed in Section 3.0.3.1, *Buildout Scenarios*, for each resource area studied, the EIR evaluates the buildout scenario with the greatest potential to result in a significant impact. In some cases, impacts would be the same regardless of the buildout scenario, so the analysis does not evaluate a specific buildout scenario. This approach ensures that the EIR identifies the maximum potential impacts of the project based on reasonably foreseeable development outcomes. Table 3.3-2 summarizes the approach used for each impact analysis related to cultural resources.

Table 3.3-2. Impact Analysis Approach for Cultural Resources

Impact Criteria	Scenario A	Scenario B	EIR Approach
Impact CUL-1: Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	--	--	Same for both scenarios. The project footprint, the presence or absence of historical resources, and the project's general characteristics dictate the impacts on historical resources. The project area, existing conditions, and general project characteristics are the same under both scenarios; therefore, the analysis approach is not based on one scenario or the other, and accounts for any future development that could occur under the project.
Impact CUL-2: Cause a substantial adverse change in the significance of a known archaeological resource pursuant to Section 15064.5?	--	--	Same for both scenarios. The project footprint, the presence or absence of archaeological resources, and the project's general characteristics dictate the impacts on archaeological resources. The project area, existing conditions, and general project characteristics are the same under both scenarios; therefore, the analysis approach is not based on one scenario or the other, and accounts for any future development that could occur under the project.
Impact CUL-3: Disturb any human remains, including those interred outside of dedicated cemeteries?	--	--	Same for both scenarios. The project footprint, the presence or absence of human remains, and the project's general characteristics dictate the impacts on human remains. The project area, existing conditions, and general project characteristics are the same under both scenarios; therefore, the analysis approach is not based on one scenario or the other, and accounts for any future development that could occur under the project.

3.3.3.4 Impacts and Mitigation Measures

Impact CUL-1: The project would not cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5 (Less Than Significant With Mitigation).

The project would demolish all buildings and structures on the project site except for the Century at Tanforan Theater and the Target, both of which would be incorporated into the new transit-oriented, mixed-use development. As discussed above, ICF evaluated The Shops at Tanforan to determine whether the on-site uses meet the criteria for listing in the NRHP or CRHR and thus could qualify as a historical resource for the purposes of CEQA (see Appendix 3.3-1, *The Shops at Tanforan, San Bruno, California, Historic Resource Evaluation*). The evaluation determined that The Shops at Tanforan are not a historical resource. Therefore, the proposed demolition of The Shops at Tanforan would not constitute a significant impact on a historical resource.

The project would also develop a vacant parcel north of Sneath Lane between Huntington Avenue and Maple Street. There are no buildings or structures on the parcel. Furthermore, the records search results do not reveal any other individual historical resources (including archaeological resources) located within the additional northern parcel. Therefore, the project would not cause a substantial adverse change to any individual historical resources within this portion of the project site.

As discussed above, the project site includes a previously identified historical resource: CHL No. 934 Temporary Detention Camps for Japanese Americans-Tanforan Assembly Center in San Mateo County. No aboveground features of this CHL No. 934 site remain on the project site since the detention camp has been demolished. After the temporary facilities were demolished, the resource's setting was further altered with post-World War II development around the property and with the construction of The Shops at Tanforan. Property owners in the early 2000s added a contemporary memorial plaque and a commemorative garden to the site, marking the location of former Tanforan Assembly Center—a physical recognition similar to those on other CHL No. 934 sites.

At the time of nomination to the CRHR in 1980, the site looked much as it does today, and there was no visible above-grade extant historic fabric from the period of significance. The ephemeral and temporary nature of the site means that design, materials, workmanship, feeling, association, and setting are not key aspects of integrity for this resource to convey its significance. However, the resource retains integrity of location, which is the key aspect of integrity for this historical resource to convey its significance. The character-defining features include the resource's proximity to transportation, its once-open spaces embodying desirable locations for establishing temporary detention centers, and its then relative isolation from other large population centers within California. The period of significance for the property is April 1942 through October 1942.

A review of the project design under both Scenario A and Scenario B indicates that the memorial plaque and garden commemorating CHL No. 934 may need to be removed to accommodate future structures. The removal of the memorial plaque and garden would diminish the integrity of the historical resource's association, resulting in a significant impact. However, this impact could be reduced to less than significant with the implementation of **Mitigation Measure CUL-1.** This mitigation measure differs from Mitigation Measure CUL-1.1 of the Housing Element Update IS/MND, which requires preservation of the memorial plaque and commemorative garden in place. However, **Mitigation Measure CUL-1** still ensures the existence and retention of a physical marker of the historical resource. The continued presence of a memorial plaque and commemorative garden

on the project site would serve as a physical identifier of the CHL No. 934 site and effectively convey the original historical resource's integrity of location in a publicly visible and accessible location. Therefore, **Mitigation Measure CUL-1** is equally or more protective of the environmental resource as the corresponding mitigation measure in the Housing Element IS/MND. With implementation of **Mitigation Measure CUL-1**, the project would not cause a substantial adverse change to any individual buildings or structures that qualify as historical resources within the project site, and impacts would be ***less than significant with mitigation***.

Mitigation Measures

Mitigation Measure CUL-1: Relocate and Incorporate the Existing Memorial Plaque and Commemorative Garden on the Property.

The applicant shall incorporate the existing onsite memorial plaque and commemorative garden for CHL No. 934 Temporary Detention Camps for Japanese Americans-Tanforan Assembly Center in San Mateo County into the project design. The memorial plaque and commemorative garden may be temporarily removed, protected, and securely stored during construction activities before being permanently relocated to a publicly visible and publicly accessible location within the project's retail village. The memorial plaque and commemorative garden shall be permanently installed in its new location prior to the completion of construction of the retail village.

Impact CUL-2: The project would not cause a substantial adverse change in the significance of a known archaeological resource, pursuant to Section 15064.5 (Less Than Significant With Mitigation).

The records search conducted at the NWIC for the project site found that no archaeological sites have been identified on the project site or within 0.25 mile of the project site. Therefore, no known archaeological sites would be affected by the project, and the project would not result in a substantial adverse change to a known archaeological resource. Furthermore, based on the geoarchaeological sensitivity analysis described above, the project site is considered to have low sensitivity for containing buried precontact archaeological resources. However, it may still be possible that the geologic layer contains such resources. Intact historical archaeological resources that remain from CHL No. 934 Temporary Detention Camps for Japanese Americans-Tanforan Assembly Center in San Mateo County could also be present below the ground surface, particularly in the archaeologically sensitive areas shown in Figure 3.3-2. If construction activities associated with the project were to encounter such resources, a significant impact could occur. With implementation of **Mitigation Measure CUL-2-A** and **Mitigation Measure CUL-2-B**, which reflect requirements for future development on the project site outlined in Mitigation Measure CUL-2.2 and Mitigation Measure CUL-2.3 in the Housing Element Update IS/MND, this impact would be ***less than significant with mitigation***.

Mitigation Measures

Mitigation Measure CUL-2-A: Conduct Cultural Resource Awareness Training and Exploratory Trenching Prior to Project-Related Ground Disturbance.

Prior to ground-disturbing activities (e.g., grading, trenching, excavation) within the nonsensitive areas mapped on Figure 3.3-2, the project applicant shall hire a qualified archaeologist to develop a Worker's Environmental Awareness Program to train the construction crew on the legal requirements for the treatment of cultural resources as well as procedures to follow in the event of a cultural resources discovery. This training program shall be given to the crew before ground-disturbing work commences and shall include handouts to be given to new workers. The applicant shall note on all construction plans that require ground-disturbing activities that there is a potential for exposing buried cultural resources including prehistoric Native American burials.

Prior to ground-disturbing activities (e.g., grading, trenching, excavation) in the archaeologically sensitive areas shown on Figure 3.3-2, exploratory trenching shall be conducted by a qualified archaeologist trained in both local prehistoric and historical archaeology within the proposed area of effect to determine if precolonial- or historic-era archaeological resources are present. Explorations shall consist of at least one mechanically dug trench with excavation depths commensurate with the depth of proposed ground-disturbing activities. If any archaeological resources are exposed, these should be briefly documented, tarped for protection, and left in place. The results of the exploratory trenching shall be submitted to the Director of Community Development or the Director's designee. If it is determined by the project archaeologist that the proposed activities could damage an archaeological resource or that indications of other suspected archaeological resources are present (i.e., darkened soil "midden" representing past human activity), an Archaeological Resources Treatment Plan shall be prepared as described below.

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

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

A qualified archaeologist shall be present for any ground-disturbing activities in the sensitive areas shown in Figure 3.3-2.

Mitigation Measure CUL-2-B: Stop Work if Buried Cultural Deposits are Encountered During Construction Activities.

In the event that potentially significant archaeological resources are encountered during ground-disturbing activities at the project site, all activity within a 50-foot radius of the find shall be stopped, the Director of Community Development or the Director's designee shall be notified, and a qualified professional (cultural resources specialist, archaeologist, or Tribal representative, depending on the nature of the resource) shall examine the find. The qualified cultural resources specialist shall follow the following procedures if the resource cannot be completely avoided.

- **Determine if the resource is an historical resource.** The qualified cultural resources specialist or archaeologist shall determine if there is a potential for the resource to be a historical resource. Work can resume if there is no potential for the resource to qualify as a historical resource. If there is a potential for the resource to be a historical resource, the qualified cultural resources specialist or archaeologist shall prepare an Evaluation Plan.
- **Prepare an Evaluation Plan.** The Evaluation Plan shall be prepared specific to the resource and shall contain procedures used to determine if the discovered resource is an historical resource. The Evaluation Plan shall include enough discussion of background and context to provide for evaluation of the resource under the historical resource criteria. It shall include a description of procedures that will be used to gather information for the evaluation, which may include but not be limited to excavation, written documentation, interviews, and photography. For any archaeological resource testing, the Evaluation Plan shall describe testing procedures, such as surface collection, test excavations, analysis methods, and reporting procedure.
- **Implement Evaluation Plan.** The Evaluation Plan shall be implemented in the field, and the subsequent report shall evaluate the resource based on the criteria contained in the Evaluation Plan, making a conclusion whether the resource is historical. If the resource is not historical, protective barriers can be removed and work can continue in the area. If the resource is historical, the qualified cultural resources specialist or archaeologist shall prepare a Data Recovery Plan.
- **Prepare a Data Recovery Plan.** A Data Recovery Plan shall be prepared consistent with CEQA Guidelines Section 15126.4(b)(3)(C) and PRC Section 21083.2. The Data Recovery Plan will contain a description of how data recovery will mitigate impacts on the resource to less than significant. It shall contain a description of level of effort (e.g., quantity of excavation units), excavation procedures, laboratory methods, types of samples to be collected (e.g., sediment), and the techniques that will be used to obtain information about the features of the site that make it a historical resource. Additionally, the Data Recovery

Plan shall include a description of the reporting procedure. Once the Data Recovery Plan is completed, fieldwork can commence. Work can resume in the area once the qualified cultural resources specialist/archaeologist determines that no additional information needs to be recovered to satisfy fieldwork, reporting, and documentation requirements to reduce impacts to less than significant.

- **Prepare a Data Recovery Report.** A Data Recovery Report shall be prepared following completion of data recovery fieldwork. The report shall present results of data recovery, including field methods used, location and size of excavations, and analysis of materials recovered. It shall contain conclusions made based on the fieldwork, as well as where any recovered artifacts, samples, and documentation will be curated. Curation facilities must meet requirements of 36 CFR 79. The Data Recovery Report shall be submitted to NWIC, with all impacted known resources recorded on Department of Parks and Recreation 523 forms.

Impact CUL-3: The project would not have the potential to disturb or potentially disturb any undiscovered human remains, including those interred outside of formal cemeteries (Less than Significant).

As stated previously, no previously identified archaeological resources have been recorded in the project site or identified within 0.25 mile of the project site. No known previously recorded dedicated cemeteries or cultural resources that include human remains are located in or adjacent to the project site. However, there is a potential for exposing buried cultural resources including prehistoric Native American burials. If human remains or suspected human remains are identified, the applicant and City would comply with relevant California law, including, but not limited to CEQA Guidelines Section 15064.5(e); PRC Sections 5097.94, 5097.98, and 5097.99; and California Health and Safety Code Section 7050.5. These statutes require that, if human remains are discovered during construction activities, potentially damaging ground-disturbing activities in the area of the remains shall be halted immediately and the county coroner shall be immediately notified. As the statutory and regulatory processes unfold, significant impacts could occur if the remains are further disturbed.

Therefore, construction of the project has the potential to encounter as-yet undocumented human remains. No additional ground disturbance would occur during operation, and so there would be no additional impact. For construction, the laws discussed above would be implemented in the case of such an encounter, and impacts would be ***less than significant***.

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3.4 Energy

3.4.1 Introduction

This section evaluates the potential impacts on energy that could result from construction and operation of the Tanforan Redevelopment Project (project). This section also describes existing conditions at the project site as well as the regulatory framework for this analysis. Impacts resulting from implementation of the project, and feasible mitigation measures, where applicable, are also described.

No questions or concerns related to energy were raised in the Notice of Preparation (NOP) (Appendix 1-1, *Notice of Preparation and Comments Received on the Notice of Preparation*).

3.4.2 Existing Conditions

3.4.2.1 Regulatory Setting

This section summarizes regulations and policies that are relevant to the analysis of the project's potential impacts on energy resources.

Federal

Corporate Average Fuel Economy Standards

As discussed in Section 3.1, *Air Quality*, and Section 3.6, *Greenhouse Gases*, the National Highway Traffic Safety Administration (NHTSA) sets Corporate Average Fuel Economy (CAFE) standards to improve average fuel economy (i.e., reduce fuel consumption) and reduce greenhouse gas (GHG) emissions generated by passenger cars and light-duty trucks (collectively, light-duty vehicles) and medium- and heavy-duty trucks and engines. The existing CAFE standards require an industry-wide fleet average of approximately 49 miles per gallon for passenger cars and light trucks in model year 2026; this will be accomplished by increasing fuel efficiency by 8 percent in model years 2024 and 2025 and 10 percent in model year 2026. Phase 2 of the Greenhouse Gas Emissions Standards and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles applies to medium- and heavy-duty vehicles from model years 2019 through 2027. On April 12, 2023, the U.S. Environmental Protection Agency (EPA) proposed two new federal vehicle standards that will build on the existing CAFE and Phase 2 standards. The Multi-Pollutant Emissions Standards for Model Years 2027 and Later Light-Duty and Medium-Duty Vehicles proposes more stringent emissions standards for light- and medium-duty vehicles in model years 2027 through 2032 and accelerates deployment of electric and clean vehicles. The Greenhouse Gas Standards for Heavy-Duty Vehicles—Phase 3 establishes fleet mix performance standards for vocational vehicles (e.g., delivery trucks) and trucks that are typically used to haul freight.

In June 2024, NHTSA published updated CAFE standards for passenger cars and light trucks, including fuel efficiency standards for model years 2027 through 2032 that increase at a rate of 2 percent per year for passenger cars and 4 percent per year for light trucks. The proposal also includes new fuel efficiency standards for heavy-duty pickup trucks and vans in model years 2030 through 2035 that increase at a rate of 10 percent per year and 8 percent per year, respectively.

With the change in federal administration in January 2025, it is likely that NHTSA will propose changes to the CAFE standards. However, no revisions have been formally proposed yet, and revisions will need to go through the lengthy rule-making process.

State

Assembly Bill 1493, Pavley Rules (2002 and 2009 Amendments)/Advanced Clean Cars (2011)

Known as Pavley I, Assembly Bill (AB) 1493 provided the nation's first GHG standards for automobiles. AB 1493 required the California Air Resources Board (CARB) to adopt vehicle standards that will lower GHG emissions from new light-duty autos to the maximum extent feasible beginning in 2009. Additional strengthening of the Pavley standards (referred to previously as Pavley II and now referred to as the Advanced Clean Cars II regulations) was adopted for vehicle model years 2017 through 2025. Together, the two standards are expected to increase average fuel economy to roughly 54.5 miles per gallon by 2025. The increase in fuel economy will help lower the demand for fossil fuels.

In August 2022, CARB board members voted to approve the Advanced Clean Cars II proposal, which aimed to dramatically reduce emissions from passenger cars (model years 2026 through 2035). This will require an increasing proportion of new vehicles to be zero-emissions vehicles. The goal is to have 100 percent of new vehicles sold by 2035 classified as zero-emissions vehicles.

CARB also adopted the Advanced Clean Truck Regulation to accelerate a large-scale transition to zero-emissions medium- and heavy-duty vehicles. The regulation requires zero-emissions medium- and heavy-duty vehicles to make up an increasing percentage of the total annual vehicle sales in California between 2024 and 2035. By 2035, zero-emissions truck/chassis sales would need to amount to 55 percent of Class 2b-3 truck sales, 75 percent of Class 4-8 straight truck sales, and 40 prevent of truck tractor sales. By 2045, every new medium- and heavy-duty truck sold in California will be a zero-emissions vehicle. Large employers, including retailers, manufacturers, brokers, and others, will be required to report information about shipments and shuttle services to ensure that fleets purchase available zero-emissions trucks.

California Energy Efficiency Standards for Residential and Nonresidential Buildings—Green Building Code (2011), Title 24 Updates

The California Green Building Standards Code (Part 11, Title 24) (CALGreen) was adopted as part of the California Building Standards Code (24 California Code of Regulations [CCR]). CALGreen applies to the planning, design, operation, construction, use, and occupancy of newly constructed buildings, and requires the installation of energy- and water-efficient indoor infrastructure for all new projects beginning after January 1, 2011. CALGreen also requires newly constructed buildings to develop a waste management plan and divert at least 50 percent of the construction materials generated during project construction.

The current 2022 Building Energy Efficiency Standards for Residential and Nonresidential Buildings were adopted in 2021 and took effect on January 1, 2023. The 2025 Building Energy Efficiency Standards are currently in the pre-rulemaking phase. The 2022 Energy Code encourages efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, and strengthens ventilation standards among other requirements.

CALGreen Sections A5.106.5.3 and A4.106.4.2 include electric vehicle (EV) charging requirements for new nonresidential and residential development, respectively. For nonresidential uses, CALGreen Tier 2 requires 45 percent of the total parking spaces to be EV Capable and 33 percent of EV Capable spaces to be EV charging stations. For multifamily residential uses and hotels and motels, CALGreen Tier 2 requires 40 percent of the total parking spaces to be EV Ready and 15 percent of the total spaces to be equipped with Level 2 EV supply equipment.

Senate Bill 350 (2015), Chapter 547—Clean Energy and Pollution Reduction Act of 2015

Senate Bill (SB) 350 DeLeon, also known as the Clean Energy and Pollution Reduction Act of 2015, was approved by the California legislature in September 2015 and signed by Governor Brown in October 2015. Its key provisions are to require the following by 2030: (1) a Renewable Portfolio Standard (RPS)[1] of 50 percent and (2) to double statewide energy efficiency savings in natural gas and electricity end uses. In order to help meet these provisions, SB 350 requires that large utilities develop and submit integrated resource plans to detail how the utility will reduce GHG emissions and increase use of clean energy resources, while meeting the customers' needs.

Senate Bill 1020—The Clean Energy, Jobs, and Affordability Act of 2022

SB 1020 requires eligible renewable energy resources and zero-carbon resources to supply 90 percent of all retail sales of electricity to California end-use customers by December 31, 2035; 95 percent of all retail sales of electricity to California end-use customers by December 31, 2040; and 100 percent of all retail sales of electricity to California end-use customers by December 31, 2045. In addition, 100 percent of electricity procured to serve state agencies must be provided by eligible renewable energy resources and zero-carbon resources by December 31, 2035.

Senate Bill 1389, Chapter 568, Statutes of 2002

The California Energy Commission (CEC) is responsible for, among other things, forecasting future energy needs of the state and developing renewable energy resources and alternative renewable energy technologies for buildings, industry, and transportation. SB 1389 (Chapter 568, Statutes of 2002) requires CEC to prepare a biennial integrated energy policy report that assess major energy trends and issues facing the state's electricity, natural gas, and transportation fuel sectors. The report is also intended to provide policy recommendations to conserve resources, protect the environment, and ensure reliable, secure, and diverse energy supplies. The 2023 Integrated Energy Policy Report, the most recent report required under SB 1389, was adopted in February 2024.

Senate Bill 100—The 100 Percent Clean Energy Act of 2018 (2018)

SB 100 builds on SB 350, increasing the 2030 RPS target set in SB 350 to 60 percent and requires 100 percent of retail sales of electricity to California end-user customers and 100 percent of electricity procured to serve state agencies to be from renewable and other zero-carbon resources by 2045.

[1] The RPS is one of California's key programs for promoting renewable energy use within the state. The program sets forth continuous procurement of renewable energy for load-serving entities with California (California Energy Commission 2024a).

Executive Order B-16-12 (2012)

Executive Order (EO) B-16-12 orders state entities, under the direction of the governor, including CARB, CEC, and the California Public Utilities Commission (CPUC), to support rapid commercialization of zero-emissions vehicles. It also directs these entities to achieve various benchmarks related to zero-emissions vehicles.

Executive Order N-79-20 (2020)

On September 23, 2020, Governor Newsom issued EO N-70-20, directing the state to require all new cars and passenger trucks sold in California be zero-emissions vehicles by 2035. The EO also directs state agencies to develop strategies for building an integrated transit network that provides affordable multimodal transportation options for all.

California Energy Action Plan

CEC is responsible for preparing the State Energy Action Plan, which identifies emerging trends related to the energy supply, demand, conservation, public health and safety, and maintenance of a healthy economy. The State Energy Action Plan calls for the state to assist in the transformation of its transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the fewest environmental costs. The first-priority actions to address California's increasing energy demands are energy efficiency and demand response (i.e., reductions in customer electricity usage during peak periods to support system reliability and the best use of energy infrastructure.) Additional priorities include the use of renewable sources of power and distributed generation (i.e., the use of relatively small power plants near or at centers of high demand). To further this policy, the State Energy Action Plan identifies several strategies, including aiding public agencies and fleet operators.

Regional and Local

Peninsula Clean Energy 2022 Integrated Resource Plan

Peninsula Clean Energy (PCE) is a community choice energy program that serves the entirety of San Mateo County, including the City of San Bruno. PCE adopted the 2022 Integrated Resource Plan (IRP) on November 1, 2022, to provide guidance for serving the electricity needs of the residents and businesses in the county while fulfilling regulations requirements, along with achieving PCE's overall goal of providing 100 percent GHG-free electricity on a 24/7 basis by 2025 (PCE 2025).

The plan contains the following strategic goals that are relevant to the project.

- Secure sufficient, low-cost clean sources of electricity that achieve PCE's priorities while ensuring reliability and meeting regulatory mandates.
- Strongly advocate for public policies that support PCE's organizational priorities.
- Implement robust energy programs that reduce GHG emissions, align energy supply and demand, and provide benefits to community stakeholders.

Pacific Gas and Electric Company 2022 Integrated Resource Plan

Pacific Gas and Electric Company (PG&E) adopted the 2022 IRP on November 1, 2022, to provide guidance for serving the electricity and natural gas needs of residents and businesses within its serve area while fulfilling regulatory requirements. As mentioned previously, because PCE is the default electricity provider for customers in San Bruno, this plan applies to the approximately 2.5 percent of PCE customers who opt out of PCE service, and to natural gas customers.

The IRP contains the following objectives that are relevant to the project.

- **Clean energy.** In 2021, PG&E delivered nearly 48 percent of its electricity from RPS-eligible renewable resources, such as solar, wind, geothermal, biomass, and small hydropower. In addition, PG&E's GHG-free energy production, which includes renewable resources, large hydropower, and nuclear energy generation, satisfied 91 percent of PG&E's bundled retail sales in 2021.
- **Reliability.** PG&E's IRP analysis includes PG&E's contribution to system and local reliability, in compliance with CPUC's resource adequacy requirements, especially as California transitions toward higher shares of GHG-free generation resources.
- **Affordability.** PG&E's IRP analysis selects resources that meet the state's clean energy and reliability goals and provides a system average rate forecast in compliance with CPUC's requirements for investor-owned utilities.

San Bruno General Plan

The *San Bruno General Plan* (City of San Bruno 2009), adopted in 2009, includes goals and policies that relate to energy use and reduction. The *San Bruno General Plan* has identified Public Facilities and Services policies related to energy use and reduction. These policies include, but are not limited to, measures such as implementing the City's design guidelines that promote energy efficiency and requiring all new development to comply with Title 24 (CALGreen) standards. These measures contribute to energy reduction and use throughout the City, while promoting the use of renewable energy resources.

San Bruno Municipal Code

In addition to meeting all applicable regulations specified in Title 11 (Buildings, Construction, and Fire Protection), the following provisions shall apply to the construction of any new building incorporating residential and hotel uses.

> *Section 4.106.4.2.2 Electric Vehicle (EV) charging for new construction—Multifamily development projects with 20 or more dwelling units, hotels, and motels with 20 or more sleeping units or guest rooms.*[2]
>
> When parking is provided, parking spaces for new multifamily dwellings, hotels and motels shall meet the requirements of Section 4.106.4.2.1 or 4.106.4.2.2. Calculations for spaces shall be rounded up to the nearest whole number. A parking space served by electric vehicle supply equipment or designed as a future EV charging space shall count as at least one standard automobile parking space only for the purpose of complying with any applicable minimum parking space requirements established by a local jurisdiction.

[2] The number of dwelling units, sleeping units, or guest rooms shall be based on all buildings on a project site.

1. **EV Capable.** Thirty percent of the total number of parking spaces on a building site, provided for all types of parking facilities, shall be electric vehicle charging spaces (EV spaces) capable of supporting future Level two EVSE. Electrical load calculations shall demonstrate that the electrical panel service capacity and electrical system, including any on-site distribution transformer(s), have sufficient capacity to simultaneously charge all EVs at all required EV spaces at a minimum of 40 amperes.
2. **EV Ready.** Twenty-five percent of the total number of parking spaces shall have lower power Level two EV charging receptacles. For multifamily parking facilities, no more than one receptacle is required per dwelling unit when more than one parking space is provided for use by a single dwelling unit.
3. **EV Chargers.** Ten percent of the total number of parking spaces shall be equipped with Level two EVSE. Where common use parking is provided, at least one EV charger shall be located in the common use parking area and shall be available for use by all residents and guests.

Section 11.06.030—Energy Code Amendments

The City of San Bruno has amended the 2022 California Energy Code as follows:

a. All newly constructed buildings. Sections 110.0 through 110.12 apply to all newly constructed buildings within the scope of Section 100.0 (a). In addition, all newly constructed buildings shall meet the requirements of Subsections B, C, D, or E, as applicable; and shall be an All-Electric Building, as defined in San Bruno Code Section 11.06.020.

b. Section 100.1 (b) of the Energy Code has been amended as follows by the City of San Bruno to add definitions for "All-Electric Building," and "Scientific Laboratory Area"

c. All-Electric Building is a building that has no natural gas or propane plumbing installed within the building and that uses electricity as the source of energy for its space-conditioning, water-heating (including pools and spas), cooking appliances, and clothes drying appliances. All-Electric Buildings may include solar thermal pool heating.

3.4.2.2 Environmental Setting

Energy resources in the state include natural gas, electricity, water, wind, oil, coal, solar, geothermal, and nuclear. Both energy production and use can deplete nonrenewable resources, such as oil, natural gas, and coal, and result in the emissions of pollutants. This section discusses the existing conditions related to energy statewide, regionally, and at the project site.

Regional Setting

State Energy Resources and Use

California's diverse portfolio of energy resources produced approximately 1,591.0 trillion British thermal units (BTUs) in 2022 (U.S. EIA 2024a). According to CEC, total electric generation for California in 2022 (the most recent year for which data are available) was approximately 287,220 gigawatt hours. California's renewable and non-GHG resources (i.e., nuclear and large hydroelectric) accounted for approximately 54.2 percent of total generation, compared to 52.1 percent in 2021. California's in-state electric generation was approximately 203,257 gigawatt hours (CEC 2024). Excluding offshore areas, the state ranked seventh in the nation in crude oil production in 2022 (the most recent year for which data are available), producing the equivalent of approximately 708.9 trillion BTUs (U.S. EIA 2024b). Other energy sources in the state include natural gas (155.3 trillion BTUs), nuclear (183.5 trillion BTUs), and biofuel (36.8 trillion BTUs) (U.S. EIA 2024a and 2024b).[3]

[3] No coal production occurs in California.

With a relatively mild Mediterranean climate and strict energy efficiency requirements, California has lower energy consumption rates than other parts of the United States. According to U.S. EIA, California consumed approximately 6,882.4 trillion BTUs of energy in 2022 (U.S. EIA 2024c).[4] California's per capita energy consumption of approximately 176.3 million BTUs was ranked second lowest in the nation as of 2022 (U.S. EIA 2024d).

In 2022, the transportation sector consumed the greatest amount of energy (2,915.8 trillion BTUs, or 42 percent), followed by the industrial (1,539.3 trillion BTUs, or 22 percent), residential (1,203.7 trillion BTUs, or 18 percent), and commercial (1,193.1 trillion BTUs, or 17 percent) sectors (U.S. EIA 2024c). Natural gas accounted for the majority of energy consumption (2,130.9 trillion BTUs, or 30 percent), followed by gasoline (1,479.7 trillion BTUs, or 21 percent); renewable energy, including nuclear electric power, hydroelectric power, biomass, and other renewables (1,065.4 trillion BTUs, or 15 percent); distillates and jet fuel (1,033.8 trillion BTUs, or 15 percent); and interstate electricity (600.4 trillion BTUs, or 8 percent), with the remaining 11 percent coming from a variety of other sources (U.S. EIA 2024e). Of the natural gas consumed, industrial uses consumed approximately 30 percent, followed by residential uses (22 percent) and commercial uses (12 percent), among many other uses (U.S. EIA 2024f).

Per capita energy consumption, in general, is declining because of improvements in energy efficiency and design. However, despite this reduction in per capita energy use, the state's total overall energy consumption (i.e., non–per capita energy consumption) is expected to increase over the next several decades as a result of growth in vehicle travel.

Regional Energy Resources and Use

Electricity

PG&E provides electricity to San Mateo County through its distribution system. Historically, PG&E has provided natural gas and electricity services to the vast majority of Northern California, including San Mateo County and the project site. PG&E is a publicly traded utility company that, under contract with the CPUC, generates, purchases, and distributes energy. PG&E's service area covers 70,000 square miles, roughly extending north to south from Eureka to Bakersfield and east to west from the Sierra Nevada to the Pacific Ocean. PG&E's electricity distribution system consists of 106,681 circuit miles of electric distribution lines and 18,466 circuit miles of interconnected transmission lines (PG&E 2024a).

PG&E's, electricity is generated from a combination of traditional sources, such as coal-fired plants, nuclear power plants, and hydroelectric dams, as well as newer sources of energy, such as wind turbines and photovoltaic plants, or "solar farms." "The grid," or bulk electric grid, is a network of high-voltage transmission lines that link power plants to the PG&E system. The distribution system, comprising lower-voltage secondary lines, is at the street and neighborhood level. It consists of overhead or underground distribution lines, transformers, and individual service "drops" that connect to individual customers.

[4] One BTU is the amount of energy required to heat 1 pound of water by 1°F at sea level. BTU is the standard unit of energy used in the United States and based on the English system of units (foot-pound-second system).

As discussed previously, PCE is San Mateo County's default electricity provider. Individuals can opt out of PCE and switch to PG&E at any time, and in 2019 it was reported that approximately 2.5 percent of PCE customers opted out of PCE service (Moody's Investor Service 2019). Nonetheless, PCE is the county's default provider, and their rates are lower or comparable to PG&E, depending on the selected PCE rate plan. PCE provides electricity to the City of San Bruno, including the project site. Its power comes from a mix of various sources, including solar, wind, geothermal, biomass and biowaste, and hydroelectric generation resources. PCE delivers power to its customers via existing PG&E utility infrastructure. The company allows customers to choose between three different electricity product operations: ECOplus, which contains 50 percent of renewable resources as electricity sources, ECO100, which is 100 percent renewable resources as electricity sources, and Green Access, which is 100 percent solar power as the electricity source (PCE 2025). PCE intends to provide 100 percent clean and renewable energy by 2030.

Electricity usage for different land uses varies substantially by the type of uses in a building, the type of construction materials used, and the efficiency of the electricity-consuming devices used. In 2022, San Mateo County consumed approximately 4,177 million kilowatts of electricity. In San Mateo County, electricity was consumed primarily by the nonresidential sector (62 percent), followed by the residential sector (38 percent) (CEC 2023a).

Table 3.4-1 outlines PCE's power mix in 2023 compared to the power mix for the state and identifies the renewable and nonrenewable energy sources for PCE and the state. Some GHG-free sources are not considered renewable (e.g., nuclear is GHG-free but not renewable).

Table 3.4-1. Peninsula Clean Energy and the State of California Power Mix in 2023

Energy Resources	PCE Option: ECOplus	PCE Option: ECO100	PCE Option: Green Access	2023 California Power Mix
Eligible renewable	51.7%	100%	100%	36.9%
Biomass & biowaste	0%	0%	0%	2.1%
Geothermal	14.4%	0%	0%	4.8%
Eligible hydroelectric	1%	0%	0%	1.8%
Solar	17.1%	50%	100%	17%
Wind	19.3%	50%	0%	11.2%
Coal	0%	0%	0%	1.8%
Large hydroelectric	48.3%	0%	0%	11.7%
Natural gas	0%	0%	0%	36.6%
Nuclear	0%	0%	0%	9.3%
Other	0%	0%	0%	0.1%
Unspecified sources	0%	0%	0%	3.7%
Total	**100%**	**100%**	**100%**	**100%**

Source: PCE 2025.

Natural Gas

PG&E's natural gas (i.e., methane) delivery system includes 42,141 miles of natural gas distribution pipelines and 6,438 miles of transmission pipelines (PG&E 2024a). PG&E's gas transmission system is operated under an inspection and monitoring program in real time on a 24-hour basis, with leak inspections, surveys, and patrols continuously taking place along the pipelines. Gas delivered by PG&E originates in gas fields in California, the Southwest, the Rocky Mountains, and Canada. Transmission pipelines send natural gas from the fields and storage facilities. The smaller distribution pipelines deliver gas to individual businesses or residences (PG&E 2024b).

In San Mateo County, approximately 204 million therms of natural gas were consumed in 2022 (the most recent year for which data are available). In 2022, natural gas in San Mateo County was consumed primarily by the residential sector (56 percent), followed by the nonresidential sector (44 percent) (CEC 2023b).

Project Site

The project site currently comprises the Tanforan Mall and a vacant parcel north of Sneath Lane. The mall property is developed with various retails uses (Hyundai of San Bruno [formerly Sears], Target, and JCPenney), parking structures, and surface parking lots. The Target and two parking structures exist in the southern portion of the project site, and a Cinemark Century movie theater, parking structure, and an automotive service building exist in the northern portion of the project site. Table 3.4-2 provides the existing energy usage at the project site.

As stated previously, PG&E and PCE provide natural gas and electricity, respectively, to the City of San Bruno; thus, the project site via right-of-way electric and natural gas lines. A network of 5-foot and 7-foot PG&E easements traverse the project site. Natural gas pipelines are below ground in public rights-of-way. The gas transmission pipelines adjacent to U.S. 101 and Interstate 280 are approximately 0.85 mile east and 1 mile west of the project site (U.S. Department of Transportation N.D).

Table 3.4-2. Existing Operational Energy Resource Consumption at the Project Site (2025)

Energy Resources (million BTU/year)	Project Site
Electricity	43,278
Natural Gas	8,876
On-road Mobile Sources [a]	301,250
Total	**353,403**

Source: CalEEMod. See Appendix 3.1-1, *Air Quality and Greenhouse Gas Technical Appendix*.
BTU= British thermal units
[a] On-road mobile sources includes energy consumed by diesel, gasoline, natural gas, electricity, and hybrid-fueled cars, trucks, buses, and delivery vehicles.

3.4.3 Environmental Impact Analysis

This section describes the environmental impacts of the project on energy resources. It describes the thresholds used to determine whether an impact would be significant and methods used to evaluate the impacts. Measures to mitigate significant impacts are provided, where appropriate.

3.4.3.1 Thresholds of Significance

In accordance with Appendix G of the California Environmental Quality Act (CEQA) Guidelines, the project would have the potential to have a significant effect on energy resources if it would result in any of the following conditions.

a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

3.4.3.2 Methodology and Approach

Energy impacts associated with construction and operation of the project were assessed and quantified, using standard and accepted software tools and techniques. The analysis also considered the list of energy impact possibilities and potential conservation measures included in Appendix F of the CEQA Guidelines for determining whether a project would result in the wasteful, inefficient, or unnecessary consumption of energy resources.

Construction

Construction activities for the project would use energy, such as electricity for off-road construction equipment and fuel for off-road construction equipment, haul trucks, vendor trips, and workers' trips. The construction schedule, equipment operating details, trip numbers and lengths, and material quantities were based on project-specific information provided by the project applicant. Assumptions regarding typical construction activities and default values from the California Emissions Estimator Model (CalEEMod) Version 2022.1, which considers a project's location and land use type, were also used. The calculation of energy consumption from vehicles, in the form of fuel use, was based on the quantity and length of trips provided by the project applicant, which was peer reviewed by the City's consultant team, along with emission factors from CARB's EMissions FACtor 2021 Model (EMFAC2021).

Detailed model assumptions and inputs for the project's construction and operational energy usage are provided in Appendix 3.1-1, *Air Quality and Greenhouse Gas Technical Appendix*.

Operations

The project would remove existing uses on the site that currently use energy. As such, the net effect of the project would be the difference between existing uses and project uses. Energy consumption associated with operation of the existing uses and the project includes building natural gas (existing uses only) and electricity use; diesel, electricity, gasoline, and natural gas use for mobile sources (i.e., vehicles); and fuel for diesel-fueled emergency generators.

Project energy usage would depend on the mix of land uses ultimately constructed (refer to Section 3.4.3.3, *Buildout Scenarios Evaluated*, for a discussion of the buildout scenarios identified for EIR analysis purposes). For existing (2025) conditions, natural gas and electricity use was quantified using CalEEMod Version 2022.1 based on the existing land use types and building. Defaults reflecting implementation of state measures to reduce energy use and resulting GHG emissions (e.g., SB 100, compliance with Title 24) were assumed for full buildout (2034) conditions. For full buildout (2034) conditions applicant-provided estimates of approximately 111,000,000 and 91,000,000 kilowatt hours per year under Scenario A and Scenario B, respectively, were used. The project would not result in any building natural gas use because the proposed uses would be all-electric, as described in Chapter 2, *Project Description*.

Fuel consumption associated with vehicle trips to and from the project site was quantified using trip generation data from Fehr & Peers, trip length assumptions from CalEEMod Version 2022.1, and emissions factors from CARB's EMFAC2021 dataset. Fuel consumption associated with the diesel-powered emergency generators proposed under Scenario A and Scenario B (19 and 17 generators, respectively) was estimated using the CalEEMod emissions estimates and conversion factors applicable to diesel fuel (The Climate Registry 2023). There are currently two emergency generators on the site, including a 500-kilowatt unit and a 45-kilowatt unit, that would be decommissioned as part of the project. These generators were not included in the analysis of existing energy use due to a lack of detailed operational data at the time of modeling. Because the existing generator energy use was not quantified for the existing scenario, the project's net energy use estimates are conservative, and the actual net energy consumption is likely to be lower than presented in this analysis due to the removal of the existing generators.

Please refer to Appendix 3.1-1, *Air Quality and Greenhouse Gas Technical Appendix*, for the CalEEMod output files and fuel use calculations.

3.4.3.3 Buildout Scenario Evaluated

As discussed in Section 3.0.3.1, *Buildout Scenarios*, for each resource area studied, the EIR evaluates the scenario with the greatest potential to result in a significant impact. In some cases, impacts would be the same regardless of the buildout scenario, so the analysis does not evaluate a specific buildout scenario. This approach ensures that the EIR identifies the maximum potential impacts of the project based on reasonable foreseeable development outcomes. Table 3.4-3 summarizes the approach used for each impact analysis related to energy resources.

Table 3.4-3. Impact Analysis Approach for Energy

Impact Criteria	Scenario A	Scenario B	EIR Approach
Impact EN-1: Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	Scenario A has more Life Science Lab & Office and more Amenity use.	Scenario B has more Residential and Hotel use.	Both scenarios evaluated. While it is probable that each scenario would implement similar efficiency measures, energy use would be different under either scenario. Air quality modeling outputs conducted for both scenarios indicated that Scenario B would consume more energy during construction, and Scenario A would consume more energy during operation. Therefore, the construction portion of the analysis assumes Scenario B and the operational portion of the analysis assumes Scenario A.
Impact EN-2: Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	--	--	Same for both scenarios. It is probable that each scenario would implement similar efficiency measures and have the same general characteristics such that they would have similar impacts related to energy plans. Therefore, the analysis approach is not based on one scenario or the other, and accounts for any future development that could occur under the project.

3.4.3.4 Impacts and Mitigation Measures

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

Construction

Construction of the project would result in the temporary usage and consumption of energy resources on the project site. Construction energy use would include electricity used to power electric construction equipment, mobile offices, or water delivered to construction sites; gasoline and diesel fuel used for transportation of workers and haul trucks to and from construction sites; and fuel used for operation of off-road equipment. Construction-related energy usage and consumption would occur intermittently throughout the course of project buildout and would vary substantially depending on the level of activity, length of construction period, specific construction operations, types of equipment, and number of personnel. Approximately 225,234 million BTUs would be consumed over the project's approximately 7.5-year construction period under Scenario B, which (as discussed in Section 3.4.3.2, *Methodology and Approach*) would consume more energy during construction than Scenario A. This could result in a significant impact if construction measures or practices are not implemented to improve the energy efficiency of construction equipment (and subsequent construction activities) and reduce overall energy consumption to the greatest extent feasible.

As discussed in Section 3.16, *Utilities*, the project would require the installation of new connections to the surrounding PG&E electric grid to provide service to future buildings throughout the project site. The construction of the proposed electricity infrastructure improvements incorporated within the project, and associated ground disturbing activities, would have the potential to cause significant adverse environmental impacts such as fugitive dust generation, noise generation, sedimentation, and erosion. The proposed utility expansions are part of the Project Description, and the potential impacts that would result from the construction of these facilities, and associated ground disturbing activities are evaluated throughout this EIR (e.g., refer to Section 3.1, *Air Quality*, Section 3.8, *Hydrology and Water Quality*, Section 3.10, *Noise and Vibration*, and Section 3.16 *Utilities*, etc.). As detailed in Section 3.16, *Utilities*, the construction of new or expanded electrical infrastructure required to serve the project, and described in Chapter 2, *Project Description*, would not result in significant environmental effects; impacts would be less than significant.

The types of land uses envisioned for the project would involve construction activities typical of development within the planning area, and no land uses are expected to require an extraordinary amount of energy consumption during construction, as may occur with large, industrial facilities, like new power plants or dams, because no such land uses are proposed or permitted within the project site. In addition, as discussed in Section 3.6, *Greenhouse Gases*, the project would be required to comply with, and implement, the Bay Area Air District's (Air District) recommended best management practices (BMPs) during project construction including, but not limited to, the use of zero-emissions and hybrid-powered equipment to the greatest extent feasible, the use of CARB-approved renewable diesel fuel in off-road construction equipment and on-road trucks, and encouraging and providing carpools, shuttle vans, transit passes, and/or secure bicycle parking to construction workers. Furthermore, as discussed in Section 3.1, *Air Quality*, **Mitigation Measure AQ-2-A** would require all off-road diesel-powered equipment greater than 50 horsepower during construction activities to be equipped with Tier 4 Final engines, which are fuel-efficient. The Air

District's BMPs and **Mitigation Measure AQ-2-A** would reduce the amount of energy consumed in the form of fossil fuel during construction activities and the energy intensiveness associated with new building materials and disposed construction and demolition waste. As such, project construction would not result in the wasteful, inefficient, or unnecessary consumption of energy resources. This impact is ***less than significant with mitigation***.

Operation

Once operational, the project would generate vehicle trips, which would consume gasoline and diesel. The project would also result in the consumption of electricity for operational uses such as power, emergency generators, heating, cooling, research and development, life science lab, and landscaping activities. As discussed in Section 3.4.3.2, *Methodology and Approach*, the project's operational energy consumption is evaluated for Scenario A (worst-case scenario) under existing (2025) and buildout year (2034) conditions. The project would achieve additional reductions in energy consumption and usage through other sustainability features such as alternative transportation, LEED Gold certification, and on-site renewables. However, these strategies were not quantified because the exact number of installed systems and affected structures are currently unknown. Thus, this analysis may overstate the project's actual operational energy impacts. Table 3.4-4 presents the results of the operational energy analysis (expressed in terms of million BTU or MMBtu). The project's net energy consumption is determined by taking the difference in operational energy consumption between "project buildout (2034)" conditions and "existing (2025)" conditions of the project site.

Table 3.4-4. Estimated Operational Energy Consumption (Scenario A)

Analysis Condition/Source	Million BTU/Year
Existing (2025)	
Electricity	43,278
Natural gas	8,876
On-road mobile sources [a]	301,250
Total Existing [b]	***353,403***
Project Buildout (2034)	
Electricity	378,748
Natural gas	0
On-road mobile sources [a]	398,511
Stationary sources [c]	6,014
Total Project Buildout	***783,273***
Net Change with Project	
Existing vs. proposed	+429,870
Energy per Square Foot (Million BTU/sf)	
Existing	0.36
Proposed	0.24

Source: CalEEMod. See Appendix 3.1-1, *Air Quality and Greenhouse Gas Technical Appendix*.
BTUs= British thermal units
[a] On-Road Mobile sources includes energy consumed by diesel, gasoline, natural gas, electricity, and hybrid-fueled cars, trucks, buses, and delivery vehicles.

[b] As previously described, emissions from the two existing emergency generators were excluded from the baseline analysis due to insufficient operational data at the time of modeling, resulting in a conservative estimate of net project emissions.
[c] Stationary sources include energy consumed by the proposed diesel-fueled emergency generators.

As shown, buildout of the project (assuming Scenario A) would increase operational energy consumption on the project site by approximately 429,870 million BTUs when compared to existing conditions. However, energy use per square foot would decrease from approximately 0.36 million BTU per square foot under existing conditions to 0.24 million BTU per square foot under the project despite the threefold increase in building square footage. This is attributable to the energy efficiency measures to be incorporated as part of the project, as further described below.

The project would be designed to incorporate environmentally sustainable features using the latest strategies while improving environmental conditions throughout the site. Specifically, the project would incorporate on-site renewable energy resources, such as photovoltaic systems on parking garages and other large structures throughout the site, and would incorporate increased energy efficiency measures into building designs that would exceed the California energy efficiency standards (i.e., Title 24). The project would also target a 40 percent reduction in indoor water use through the use of efficient-flow and flush fixtures, smart metering, leak detection systems, and water re-use for low-maintenance and drought tolerant landscaping. Proposed buildings would be all-electric and include lighting, and the heating, ventilation, and air conditioning (HVAC) systems, along with other mechanical systems, that would be designed around maximizing energy efficiency and natural lighting. Additionally, the project would meet LEED Gold certification for life sciences buildings, and provide EV charging stations for residential and nonresidential development in accordance with CALGreen Tier 2 requirements.[5] Furthermore, as discussed in Chapter 2, Section 2.6.12, *Transportation Demand Management*, the project would include a Transportation Demand Management (TDM) program in accordance with City/County Association of Governments of San Mateo County (C/CAG) requirements. The TDM program would reduce vehicle miles traveled (VMT) and, consequently, the amount of energy consumed through mobile gasoline and diesel usage. The TDM program would include a number of measures to build upon the proposed infrastructure and on-site facilities and reduce single-occupancy vehicle trips. The specific measures are still preliminary, but are anticipated to include direct access to transit, streets that are designed to encourage bicycle/pedestrian access, pedestrian oriented uses and amenities on the ground floor, secure bicycle storage, a TDM coordinator/contact person, participation in commute.org or an equivalent Transportation Management Association, and a carpool or vanpool program.

Based on the above, buildout of the project would not result in the wasteful, inefficient, or unnecessary consumption of energy resources. This impact is ***less than significant***. No mitigation measures are required.

Mitigation Measures

Mitigation Measure AQ-2-A: Use Clean Diesel-Powered or Electric Equipment during Construction to Control Construction-Related Emissions.

Refer to Section 3.1, *Air Quality*.

[5] Under the proposed P-D zoning, CalGreen Tier 2 EV parking requirements would govern over the City's EV parking requirements set forth in Section 4.106.4.2.2 of the San Bruno Municipal Code.

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).

State and local renewable energy and energy efficiency plans applicable to the project are discussed in Section 3.4.2.1, *Regulatory Setting*. State plans include AB 1493 Pavley Rules, California Title 24 energy efficiency standards, EO B-16-12, SB 350, and SB 100. Each of these contain required standards related to energy efficiency and renewable energy development. Local plans that address energy efficiency and are designed to achieve the state's RPS mandates include PCE's and PG&E's 2022 Integrated Resource Plans. The *San Bruno General Plan* also includes goals and policies that relate to energy use and reduction.

As discussed under **Impact EN-1**, the project would encourage implementation of sustainability and transportation features, and energy use by square foot would decrease compared to existing conditions despite the threefold increase in building area that would occur. Development under the project would be required to comply with state and local renewable energy and energy efficiency plans, and would benefit from the resulting increases in energy efficiency and renewable energy development. Vehicles and energy use from increased VMT and average daily trips within the area are expected to become increasingly more efficient as a result of the regulations included in Pavley and EO B-16-12, which address average fuel economy and commercialization of zero-emissions vehicles, respectively. Building energy efficiency is also expected to increase as a result of compliance with Title 24 Building Codes, which are expected to move toward zero net energy for newly constructed buildings, and the shift toward 100 percent renewable energy under SB 350 and SB 100 regulations. With implementation of the project, PG&E and PCE would continue to pursue the procurement of renewable energy sources to meet their RPS portfolio goals and comply with state regulations. Therefore, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and the impact would be ***less than significant***. No mitigation measures are required.

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3.5 Geology, Soils, and Paleontology

3.5.1 Introduction

This section evaluates the potential impacts on geology, soils, and paleontology that could result from construction and operation of the Tanforan Redevelopment Project (project). This section also describes existing conditions at the project site as well as the regulatory framework for this analysis. Impacts resulting from implementation of the project, and feasible mitigation measures, where applicable, are described.

Relevant technical documentation used in this analysis includes the following technical study prepared for the project.

- *Preliminary Geotechnical Investigation Tanforan Mall Redevelopment San Bruno, California* (Preliminary Geotechnical Investigation) prepared by Langan, October 2022 (included as Appendix 3.5-1, *Preliminary Geotechnical Investigation*)

No questions or concerns related to geology, soils, and paleontology were raised in the Notice of Preparation (NOP) (Appendix 1-1, *Notice of Preparation and Comments Received on the Notice of Preparation*).

3.5.2 Existing Conditions

3.5.2.1 Regulatory Setting

This section summarizes regulations and policies that are relevant to the analysis of the project's potential impacts on geology, soils, and paleontology.

Federal

Earthquake Hazard Reduction Act of 1977

Federal laws codified in 42 USC 86 were enacted to reduce risks to life and property from earthquakes in the United States through the establishment and maintenance of an effective earthquake hazards reduction program. Implementation of the requirements are regulated, monitored, and enforced at the state and local levels.

State

Alquist-Priolo Earthquake Fault Zoning Act of 1972

The Alquist-Priolo Earthquake Fault Zoning Act of 1972 (Alquist-Priolo Act) (PRC Section 2621 et seq.) is intended to reduce the risk to life and property from surface fault rupture during earthquakes. The Alquist-Priolo Act prohibits the location and construction of most types of structures intended for human occupancy[1] over active fault traces and strictly regulates

[1] With reference to the Alquist-Priolo Act, a structure for human occupancy is defined as one "used or intended for supporting or sheltering any use or occupancy that is expected to have a human occupancy rate of more than 2,000 person-hours per year" (CCR, Title 14, Division 2, Section 3601[e]).

construction in corridors along active faults. The California State Geologist has established regulatory zones along active faults,[2] called "earthquake fault zones," and published maps that identify areas where surface traces of active faults are present (CGS 2024a).

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act of 1990 (PRC Sections 2690–2699.6) directs the California Geological Survey (CGS) to identify and map areas that are prone to liquefaction and landslides resulting from seismic events. The act mandates project applicants to have a site-specific geotechnical investigation performed to identify potential seismic hazards and formulate mitigation measures prior to permitting most developments within specific zoned areas.

California Building Standards Code

The California Building Standards Code, or state building code, is codified in Title 24 of the California Code of Regulations. The state building code provides standards that must be met to safeguard life or limb, health, property, and public welfare by regulating and controlling the design, construction, quality of materials, use and occupancy, location, and maintenance of all buildings and structures within the state. The state building code generally applies to all occupancies in California, with modifications adopted in some instances by state agencies or local governing bodies. The current state building code incorporates, by adoption, the 2021 edition of the International Building Code of the International Code Council, with the California amendments. These amendments include building design and construction criteria that have been tailored for California earthquake conditions.

Chapter 16 of the state building code deals with structural design requirements governing seismically resistant construction (Section 1604), including, but not limited to, factors and coefficients used to establish a seismic site class and seismic occupancy category appropriate for the soil/rock at the building location and the proposed building design (Sections 1613.5–1613.7). Chapter 18 includes, but is not limited to, the requirements for foundation and soil investigations (Section 1803); excavation, grading, and fill (Section 1804); allowable load-bearing values of soils (Section 1806); foundation and retaining walls (Section 1807); and foundation support systems (Sections 1808–1810). Chapter 33 includes, but is not limited to, requirements for safeguards at work sites to ensure stable excavations and cut-and-fill slopes (Section 3304) as well as the protection of adjacent properties, including requirements for noticing (Section 3307). Appendix J of the state building code includes, but is not limited to, grading requirements for the design of excavation and fill (Sections J106 and J107), specifying maximum limits on the slope of cut-and-fill surfaces and other criteria, required setbacks and slope protection for cut-and-fill slopes (Section J108), and erosion control through the provision of drainage facilities and terracing (Sections J109 and J110).

California Division of Occupational Safety and Health Regulations

Construction activities are subject to occupational safety standards pertaining to excavation, shoring, and trenching, as specified in California Division of Occupational Safety and Health regulations (Title 8).

[2] An active fault, for the purposes of the Alquist-Priolo Act, is one that has ruptured in the past 11,000 years.

State Historic Significance Criteria

As discussed under *Impacts and Mitigation Measures*, Appendix G of the California Environmental Quality Act (CEQA) Guidelines includes the following question: "Would the project directly or indirectly destroy a unique paleontological resource or site?" Although CEQA does not define what constitutes "a unique paleontological resource or site," Section 21083.2 defines unique archaeological resources as

> …an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:
>
> - Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
> - Has a special and particular quality, such as being the oldest of its type or the best available example of its type.
> - Is directly associated with a scientifically recognized important prehistoric or historic event or person.

This definition is equally applicable to recognizing a unique paleontological resource or site. CEQA Section 15064.5(a)(3)(D) provides additional guidance, indicating that, generally, a resource shall be considered historically significant if it has yielded, or may be likely to yield, information important in prehistory or history.

The CEQA lead agency having jurisdiction over a project is responsible for ensuring that paleontological resources are protected in compliance with CEQA and other applicable statutes. PRC Section 21081.6, Mitigation Monitoring Compliance and Reporting, requires the CEQA lead agency to demonstrate project compliance with the mitigation measures developed during the environmental impact review process.

Regional and Local

San Bruno General Plan

The 2009 *San Bruno General Plan* outlines a vision for the long-range physical and economic development of the community through 2025. The *San Bruno General Plan* contains a Health & Safety Element, which acknowledges and mitigates the risks posed by hazards (e.g., earthquake) (City of San Bruno 2009a).

The *San Bruno General Plan* includes the following policies that were adopted to avoid or mitigate environmental impacts on seismic and geologic hazards (City of San Bruno 2009a).

- **HS-A:** Reduce the risk of loss of life, injuries, loss of property, or resources due to natural hazards. Recognize the interrelationship between potential land use plans and land capacity constraints.
- **HS-B:** Reduce the potential for damage from geologic hazards through appropriate site design and erosion control.
- **HS-C:** Reduce the potential for damage from seismic hazards through geotechnical analysis, hazard abatement, emergency preparedness, and recovery planning.
- **HS-1:** Regulate development … to assure adequate mitigation of safety hazards on sites having a history of threat of slope instability, erosion, subsidence, seismic dangers (including those resulting from liquefaction, ground failure, ground rupture)[…]

- **HS-2:** Review and revise the City's Building Code, Zoning Ordinance, and Subdivision requirements to safeguard against seismic, geologic, and safety hazards.
    - Mitigation should include: Minimal grading and removal of natural vegetation to prevent erosion and slope instability. Cleared slopes should be replanted with vegetation.
    - Proper drainage control to prevent erosion of the site and affected properties.
    - Careful siting and structural engineering in unstable areas.
    - Consideration of flooding and fire hazards in siting and designing new development.
- **HS-3:** Require geotechnical investigation of all sites, except single-family dwellings, proposed for development in areas where geologic conditions or soil types are subject to landslide risk, slippage, erosion, liquefaction, or expansive soils[…]
- **HS-4:** Prevent soil erosion by retaining and replanting vegetation and by siting development to minimize grading and land form alterations.
- **HS-5:** Require preparation of a drainage and erosion control plan for land alteration and vegetation removal on sites greater than 10,000 sq. ft. in size.
- **HS-7:** Development in areas subject to seismic hazards, including ground shaking, liquefaction, and seismically induced landslides (Figure 7-2) will comply with guidelines set forth in the most recent version of the California Division of Mines and Geology Special Publication 117.
- **HS-9:** In accordance with the Alquist-Priolo Special Studies Zones Act, do not permit structures across an active fault (Figure 7-2) or within 50 feet of an active fault, except single family wood frame dwellings where no other location on a lot is feasible. Require any new development to contract with geotechnical engineers to reduce potential damage from seismic activity.
- **HS-10:** Recommend a geologic report by a qualified geologist for construction or remodeling of all structures, including single-family dwellings, proposed within 100 feet of a historically active or known active fault (Figure 7-2). Geologic reports should recommend minimum setbacks, siting and structural safety standards, to reduce potential seismic hazards. Geologic reports must be filed with the State Geologist by the City of San Bruno within 30 days of receipt.
- **HS-18:** Require developers to implement erosion and sedimentation control measures to maintain an operational drainage system, preserve drainage capacity, and protect water quality.
- **HS-22:** Require that construction-related grading and other activities comply with the Association of Bay Area Governments' (ABAG) Manual of Standards for Erosion and Sediment Control Measures and with the California Stormwater Quality Association (CASQA), Stormwater Best Management Practice Handbook for Construction.

The *San Bruno General Plan* also contains an Environmental Resources and Conservation Element, which prescribes mitigation for grading or construction on geologic units sensitive for paleontological resources (City of San Bruno 2009b).

- **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.

City of San Bruno Building Code

The Building Division of the City of San Bruno enforces the minimum standards found in the various codes adopted by the state through the Building Standards Commission and as adopted and amended by the San Bruno City Council. In particular, the City of San Bruno adopted by reference the California Building Standards Code (2022 edition) as the building code for the City (City of San Bruno 2024).

San Bruno Municipal Code

The San Bruno Municipal Code does not reference paleontological resources or fossil resources except for those that may occur in recreational facilities such as parks and trails (San Bruno Municipal Code 9.20.040).

3.5.2.2 Environmental Setting

Regional Setting

The City of San Bruno is a 5.5 square-mile (3,500-acre) city located in San Mateo County on the eastern side of the San Francisco Peninsula within the Coast Ranges Geomorphic Province, a relatively geologically young and seismically active region on the western margin of the North American plate (CGS 2002). The Coast Ranges province is characterized by rugged northwest-trending mountain chains, valleys, and ridges. The predominant geologic structure and these topographic features are controlled by folds and faults that resulted from the collision of the Farallon plate and North American plate, and subsequent strike-slip faulting along the San Andreas fault system. The San Andreas fault is more than 600 miles long, from Point Arena in the north to the Gulf of California in the south. The Coast Ranges province is bordered on the east by the Great Valley and on the west by the Pacific Ocean. It is 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.

Project Site

Physiography

The topography of the project site (including the main site and the northern parcel) slope from west to east. The elevation of the sites ranges from approximately 36.5 to 66 feet (NAVD88)[3] at the main site and 38.5 to 44.5 feet (NAVD88) at the north parcel.

Subsurface Conditions

Generally, the project site is underlain by moderately compressible medium stiff to hard clay and silt with variable amounts of sand and gravel, interbedded with layers of loose to very dense sands with variable amounts of gravel, clay, and silt, to the maximum explored depth of 110 feet below ground surface (bgs). On the west side of the project site, near El Camino Real, medium-dense clayey sand

[3] The North American Vertical Datum of 1988 (NAVD 88) is the vertical control datum established in 1991 by the minimum-constraint adjustment of the Canadian-Mexican-United States leveling observations. It held fixed the height of the primary tidal benchmark, referenced to the new International Great Lakes Datum of 1985 local mean sea level height value, at Father Point/Rimouski, Quebec, Canada.

fill was encountered, extending to a depth of 7 feet bgs (Langan 2022). Depth to groundwater at the main project site ranges from approximately 12 to 39 feet bgs, with historic monitoring well data indicating high groundwater between 5.5 and 24.1 feet bgs. At the north parcel, depth to groundwater was encountered at 13.3 feet bgs, with historic monitoring well data indicating high groundwater between 8.0 and 8.3 feet bgs. Seasonal and ambient changes in water availability can result in changes to the groundwater level (Langan 2022). Sediments above the water table include loose to dense sand. Sediments below the water table include discontinuous layers of medium-dense silty sand and clayey sand (Langan 2022).

Primary Seismic Hazards

Surface Fault Rupture

The project site is not within a state-designated Alquist-Priolo Earthquake Fault Zone, and no known active or potentially active surface expression of fault traces crosses the site (CGS 2024b). Therefore, the likelihood of surface fault rupture within the project site area is low. However, as shown in Figure 3.5-1 the project site is located in a seismically active region, with major active faults in the areas including the San Andreas, Pilarcitos, San Gregorio, Monte Vista-Shannon, and Hayward-Rodgers Creek faults. In a seismically active area such as the San Francisco Bay Area, the possibility of future surface fault rupture occurring in areas where faults have not been mapped is small, but the possibility exists. Table 3.5-1 lists the active faults within 30 miles of the project site, their direction from the project site, and the estimated mean characteristic moment magnitude.

Table 3.5-1. Regional Faults and Seismicity

Fault Segment	Approx. Distance from Fault (miles)	Direction from Site	Mean Characteristic Moment Magnitude
San Andreas 1906 event	1.7	West	8.1
Pilarcitos	5.6	Southwest	6.7
Total San Gregorio	7.5	West	7.6
Monte Vista – Shannon	12.4	Southeast	7.0
Total Hayward-Rodgers Creek Healdsburg	16.8	East	7.6
Mission (connected)	20.5	East	6.1
Butano	23.0	South	6.7
Contra Costa (Lafayette)	23.0	Northeast	6.1
Total Calaveras	24.9	East	7.5
Franklin	24.9	Northeast	6.7
Contra Costa (Larkey)	24.9	Northeast	6.0
Contra Costa Shear Zone (connector)	25.5	Northeast	6.6
Mount Diablo Thrust	26.7	Northeast	6.6
Contra Costa (Dillon Point)	28.6	Northeast	6.1
Concord	29.8	Northeast	6.4

Source: Langan 2022.

Legend

County Boundary Earthquake Epicenter

Magnitude

- Magnitude 5 to 5.9
- Magnitude 6 to 6.9
- Magnitude 7 to 7.4
- Magnitude 7.5 to 8

Notes:

1. Quaternary fault data displayed are provided by the CGS Map Sheet 48: Fault-based seismic sources used in the Uniform California Earthquake Rupture Forecast, Version (UCERF3).
2. The Earthquake Epicenter (Magnitude) data is provided by the U.S Geological Survey (USGS) and is current through 2015.
3. Basemap hillshade and County boundaries provided by USGS and California Department of Transportation.
4. Map displayed in California State Coordinate System, California (Teale) Albers, North American Datum of 1983 (NAD83), Meters.

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Miles

Source: Langan Engineering and Environmental Services, Inc., October 2022.

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Figure 3.5-1
Regional Fault Map

Seismic Ground Shaking

Ground shaking is the most widespread hazardous phenomenon associated with seismic activity. As shown in Figure 3.5-1, the project site is close to several active faults, each of which is capable of generating a large earthquake. Because the project site is within a seismically active area, it will most likely experience periodic minor earthquakes and a major earthquake (i.e., moment magnitude greater than 6) during the operational life of the project. The 2016 U.S. Geological Survey (USGS) predicted a 72 percent chance of a magnitude 6.7 or greater earthquake occurring in the San Francisco Bay Area in 30 years (Aagaard et al. 2016). During a seismic event, the project site could experience strong to very strong shaking (Langan 2022). The intensity of earthquake ground motion at the project site would depend on the characteristics of the generating fault, the distance to the earthquake epicenter, the magnitude, and the duration of the earthquake.

Secondary Seismic Hazards

Liquefaction

Liquefaction occurs when saturated soils lose cohesion, strength, and stiffness with applied shaking, such as that from an earthquake. The lack of cohesion causes solid soil to behave like a liquid, resulting in ground failure. When a load such as a structure is placed on ground that is subject to liquefaction, ground failure can result in the structure sinking and soil being displaced. Ground failure can take on many forms, including flow failures, lateral spreading, lowering of the ground surface, ground settlement, loss of bearing strength, ground fissures, and sand boils. Liquefaction within subsurface layers, which can occur during ground shaking associated with an earthquake, can also result in ground settlement.

The project site is within a liquefaction hazard zone as identified on the CGS-prepared map titled State of California Seismic Hazard Zones, San Francisco South Quadrangle Official Map, dated 23 September 2021 (Langan 2022). According to the Preliminary Geotechnical Investigation, discontinuous layers of medium-dense silty sand and clayey sand were encountered below the groundwater table between 10 and 42 feet bgs. These layers could potentially liquefy during a major earthquake.

Lateral Spreading

Lateral spreading is a phenomenon in which a surficial soil displaces along a shear zone that formed within an underlying liquefied layer. The surficial blocks are transported downslope or in the direction of a free face, such as a bay or creek, by earthquake and gravitational forces. Lateral spreading is generally the most pervasive and damaging type of liquefaction-induced ground failure generated by earthquakes. The main project site has a significant downslope toward a free face at the eastern boundary of the site; however, the potentially liquefiable soils underlying the site are not continuous beneath the main site and the northern parcel is relatively flat with low liquefaction potential (Langan 2022). Therefore, the potential risk of lateral spreading is considered low.

Seismic Settlement

Loose unsaturated sandy soils can settle during strong seismic shaking. As discussed previously under *Subsurface Conditions*, the soils encountered at the project site above the water table included loose to dense sand, which could result in seismic densification. Analysis of project site borings concluded that seismic densification could occur in the loose to dense sand above the water table, resulting in up to 3 inches of seismic-induced settlement.

However, the Preliminary Geotechnical Report found that some of these layers are within planned excavation areas, which would reduce the potential for seismic settlement. Therefore, the potential for differential seismic settlement affecting the project site is considered low.

Expansive Soils

Expansive soils can undergo significant volume change with changes in moisture content. Where these soils lie in the zone of seasonal moisture fluctuation,[4] they shrink and harden when dried and expand and soften when wetted. According to the Preliminary Geotechnical Investigation, low to moderately expansive soils underly the project site, and one sample near Sneath Lane and Huntington Avenue contains clay that was found to be highly expansive (Langan 2022). Therefore, potential exists for increased risk of injury as a result of construction on expansive soils.

Landslide

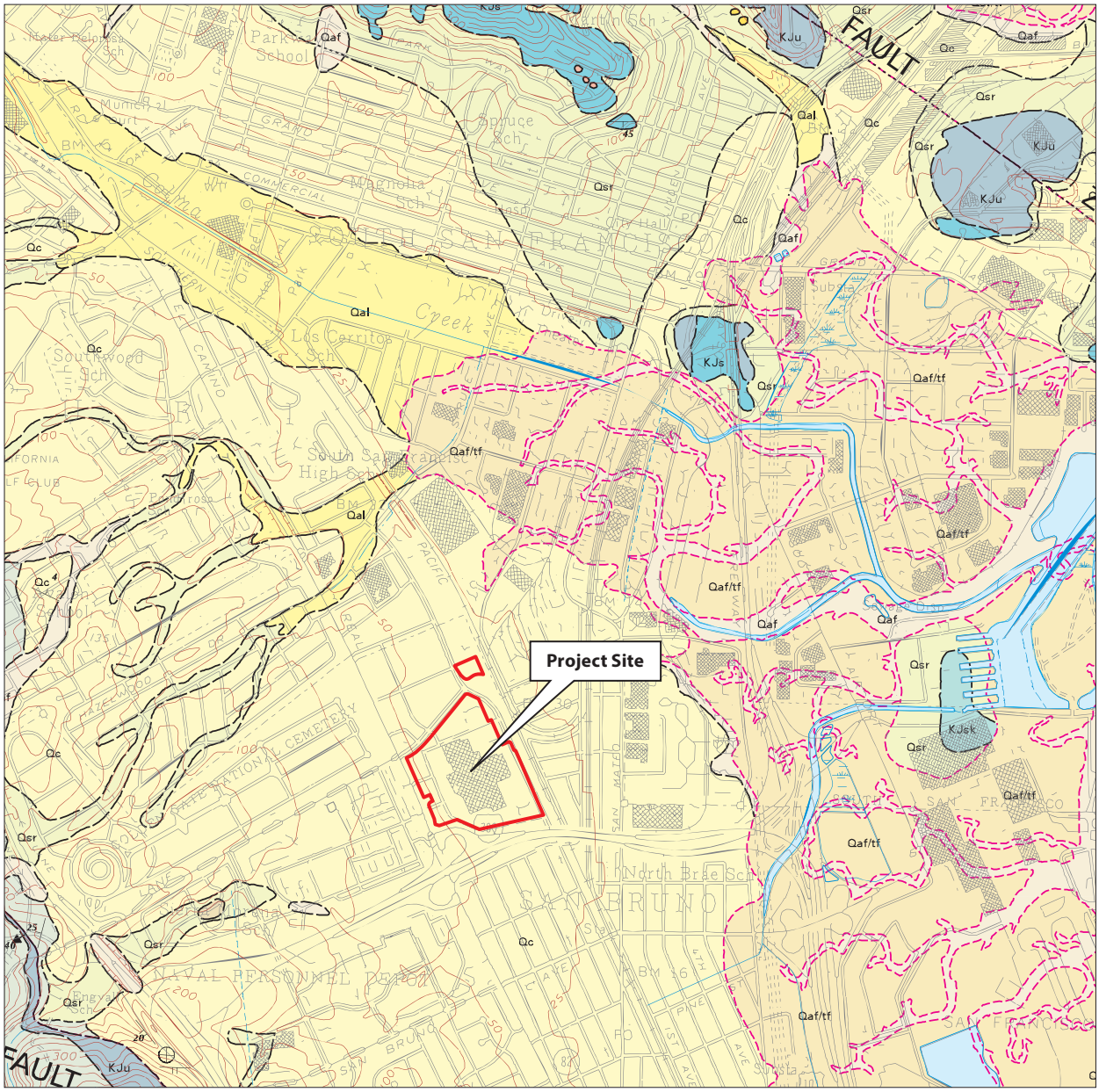
Landslides occur when the stability of a slope changes from a stable to an unstable condition. The stability of a slope is affected by the following primary factors: inclination, material type, moisture content, orientation of layering, and vegetative cover. In general, steeper slopes are less stable than more gently inclined slopes. The topography of the project site is relatively flat and the nearest landslide zone is located at Signal Hill Park, approximately 1.5 miles north of the project site (CGS 2024a). Therefore, the likelihood of a landslide at the project site is low.

Paleontological Resources

Paleontological resources are found within geologic units, which can sometimes extend large distances. The relevant unit for identifying likelihood of discovering paleontological resources is the geologic unit rather than proximity.

As shown in Figure 3.5-2, the project site is underlain by Colma Foundation (Qc) (Pleistocene) (USGS 1998). The Colma Formation is known to have yielded vertebrate fossils (Rodda and Baghai 1993). At a site on Pacific Avenue in San Francisco, Mammuthus (an extinct genus that belongs to the order of trunked mammals, including mammoth) and Bison (bison) fossils were recovered. University of California Museum of Paleontology records indicate that remains of Equus (horse) have been recovered in South San Francisco (University of California Museum of Paleontology 2020). In addition, other sensitive geologic units (such as Franciscan Complex) may underlay the Colma Formation, but were not described in the Preliminary Geotechnical Investigation. The future design-level geotechnical investigation should describe all sensitive formations underlying the project site.

[4] The zone of seasonal fluctuation is the depth of soil to which moisture penetrates, varying by season.



Geologic Units

Qaf/tf	Artificial fill over tidal flat (Holocene)
Qal	Alluvium (Holocene)
Qsr	Slope debris and ravine fill (Pleistocene)
Qc	Colma Formation (Pleistocene)
KJs	Sandstone and shale, Franciscan Complex (Cretaceous and Jurassic)

Explanation

Contact- dashed where approximate, dotted where concealed

N

0 2000 4000

APPROXIMATE SCALE (FEET)

Base: USGS, Preliminary Geologic Map of the San Francisco South 7.5' Quadrangle and Part of the Hunter's Point 7.5' Quadrangle, San Francisco Bay Area, California, by M.G. Bonilla, 1998

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Figure 3.5-2
Vicinity Geologic Map

3.5.3 Environmental Impact Analysis

This section describes the environmental impacts of the project on geology, soils, and paleontology. It describes the thresholds used to determine whether an impact would be significant and methods used to evaluate the impacts. Measures to mitigate significant impacts are provided, where appropriate.

3.5.3.1 Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, the project would have the potential to have a significant effect on geology, soils, and paleontology if it would result in any of the following conditions.

a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
   i. 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.
   ii. Strong seismic ground shaking.
   iii. Seismic-related ground failure, including liquefaction.
   iv. Landslides.
b. Result in substantial soil erosion or the loss of topsoil.
c. 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.
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.
e. 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.
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

3.5.3.2 Methodology and Approach

Geology, Soils, and Seismicity

Evaluation of the proposed project is based on the Preliminary Geotechnical Investigation prepared for the project, unless otherwise noted (Langan 2022). The Preliminary Geotechnical Investigation provided preliminary analysis for the parcels comprising the project area inclusive of the northern parcel. The Preliminary Geotechnical Investigation included field and laboratory programs to evaluate physical and engineering properties of the subsurface soils, as well as engineering analysis to prepare recommendations for site work and grading, building foundations, temporary shoring and dewatering, and other construction considerations. The Preliminary Geotechnical Investigation concluded that the proposed project is feasible from a geotechnical standpoint, but added that the conclusions and recommendations should be confirmed as part of the design-level geotechnical investigation. The Preliminary Geotechnical Investigation is included in Appendix 3.5-1.

In the *California Building Industry Association v. Bay Area Air Quality Management District* case, decided in 2015,[5] the California Supreme Court held that CEQA does not generally require lead agencies to consider how existing environmental conditions might affect a project, except where the project would significantly exacerbate an existing environmental condition. Accordingly, placing new development in an existing or future seismic hazard area or an area with unstable soils is not considered an impact under CEQA unless the project would significantly exacerbate the seismic hazard or unstable soil conditions. Therefore, the following analysis evaluates whether the proposed project would exacerbate existing or future seismic hazards or unstable soils at the project site and result in a substantial risk of loss, injury, or death.

Paleontology

The *Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources* (Society of Vertebrate Paleontology 2010) of the Impact Mitigation Guidelines Revision Committee of the Society of Vertebrate Paleontology include procedures for the investigation, collection, preservation, and cataloging of fossil-bearing sites. This includes the designation of paleontological sensitivity. The procedures are widely accepted among paleontologists and followed by most investigators. The procedures identify two key phases of paleontological resource protection: 1) assessment, and 2) implementation. Assessment involves identifying the potential for a project site or area to contain significant, nonrenewable paleontological resources that could be damaged or destroyed by project excavation or construction. Implementation involves formulating and applying measures to reduce such adverse effects.

For the assessment phase, the Society of Vertebrate Paleontology uses one of the following four sensitivity categories for sedimentary rocks (i.e., high, undetermined, low, no potential) to define the level of potential (Society of Vertebrate Paleontology 2010).

- **High Potential.** Assigned to geologic units from which vertebrate or significant invertebrate, plant, or trace fossils have been recovered as well as sedimentary rock units suitable for the preservation of fossils (middle Holocene and older fine-grained fluvial sandstones, fine-grained marine sandstones, etc.). Paleontological potential refers to the potential for yielding abundant fossils, a few significant fossils, or recovered evidence for new and significant taxonomic, phylogenetic, paleoecologic, taphonomic, biochronologic, or stratigraphic data.
- **Undetermined Potential.** Assigned to geologic units for which little information is available concerning their paleontological content, geologic age, and depositional environment. In cases where no subsurface data already exist, paleontological potential can sometimes be assessed by subsurface site investigations.
- **Low Potential.** Field surveys or paleontological research may determine that a geologic unit has low potential for yielding significant fossils (e.g., basalt flows).
- **No Potential.** Some geologic units have no potential to contain significant paleontological resources (e.g., high-grade metamorphic rocks [gneisses and schists] and plutonic igneous rocks [granites and diorites]).

[5] *California Building Industry Association v. Bay Area Air Quality Management District*, 62 Cal.4th 369. Opinion filed December 17, 2015. Available: https://caselaw.findlaw.com/ca-supreme-court/1721100.html. Accessed: January 3, 2025.

The methods used to analyze potential impacts on paleontological resources and develop mitigation for the identified impacts followed the Society of Vertebrate Paleontology's Procedures.

- **Assessment**
    - Identify the geologic units that would be affected by the project, based on the project's depth of excavation—either at the ground surface or below the ground surface, defined as at least 5 feet bgs.
    - Evaluate the potential of the identified geologic units to contain significant fossils (paleontological sensitivity).
    - Identify impacts on paleontologically sensitive geologic units as a result of near-term and longer-term construction and operation that involve ground disturbance.
    - Evaluate impact significance.
- **Implementation**
    - According to the identified degree of sensitivity, formulate and implement measures to mitigate potential impacts.

The potential of the project to affect paleontological resources is related to ground disturbance. Geologic units at the project site were identified through CGS regional maps (Wagner et al. 1991). A determination regarding the presence of paleontological resources in the units was based on the fossil record, as documented by the University of California Museum of Paleontology (University of California Museum of Paleontology 2025).

After the records search, the paleontological sensitivity of the units was assessed according to the procedures (Society of Vertebrate Paleontology 2010). For the purposes of this analysis, an impact on paleontological resources was considered significant, thereby requiring mitigation, if it would result in any of the following.

- Damage to, or destruction of, vertebrate paleontological resources.
- Damage to, or destruction of, any paleontological resource that:
    - Provides important information about evolutionary trends, including the development of biological communities;
    - Demonstrates unusual circumstances in the history of life;
    - Represents a rare taxon or a rare or unique occurrence;
    - Is in short supply and in danger of being destroyed or depleted;
    - Has a special and particular quality, such as being the oldest of its type or the best available example of its type; or
    - Provides information used to correlate strata for which it may be difficult to obtain other types of age information.

3.5.3.3 Buildout Scenario Evaluated

As discussed in Section 3.0.3.1, *Buildout Scenarios*, for each resources area studied, the EIR evaluates the buildout scenario with the greatest potential to result in a significant impact. In some cases, impacts would be the same regardless of the buildout scenario, so the analysis does not evaluate a specific buildout scenario. This approach ensures that the EIR identifies the maximum potential impacts of the project based on reasonably foreseeable development outcomes. Table 3.5-2 summarizes the approach used for each impact analysis related to geology, soils, and paleontology.

Table 3.5-2. Impact Analysis Approach for Geology, Soils, and Paleontology

Impact Criteria	Scenario A	Scenario B	EIR Approach
Impact GEO-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.** • **Strong seismic ground shaking.** • **Seismic-related ground failure, including liquefaction.** • **Landslides.**	--	--	Same for both scenarios. The project area, existing conditions, and general project characteristics dictate the impacts on seismic hazards. The project area, existing conditions, and general project characteristics are the same under both scenarios; therefore, the analysis approach is not based on one scenario or the other, and accounts for any future development that could occur under the project.
Impact GEO-2: Result in substantial soil erosion or the loss of topsoil.	--	--	Scenario B. The project area, existing conditions, and general project characteristics dictate the impacts related to soil erosion and the loss of topsoil. The project area, existing conditions, and general project characteristics are the same under both scenarios. Scenario B would result in more ground disturbance (approximately 926,300 cubic yards of excavation at a maximum depth of 45 feet below grade level). Therefore, the analysis approach is based on Scenario B.

Impact Criteria	Scenario A	Scenario B	EIR Approach
Impact GEO-3: Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project and potentially result in an onsite or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse.	--	--	Same for both scenarios. The project area, existing conditions, and general project characteristics dictate the impacts on soil stability hazards. The project area, existing conditions, and general project characteristics are the same under both scenarios. Scenario B would result in more ground disturbance (approximately 926,300 cubic yards of excavation at a maximum depth of 45 feet below grade level). Therefore, the analysis approach is based on Scenario B.
Impact GEO-4: Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.	--	--	Scenario B. The project area, existing conditions, and general project characteristics dictate the impacts from expansive soils. The project area, existing conditions, and general project characteristics are the same under both scenarios. Scenario B would result in more ground disturbance (approximately 926,300 cubic yards of excavation at a maximum depth of 45 feet below grade level). Therefore, the analysis approach is based on Scenario B.
Impact GEO-5: Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems in areas where sewers are not available for the disposal of wastewater.	--	--	Same for both scenarios. Neither scenario proposed the use of septic tanks.
Impact GEO-6: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	--	--	Scenario B. The project area, existing conditions, and general project characteristics dictate the impacts on paleontological resources. The project area, existing conditions, and general project characteristics are the same under both scenarios. Scenario B would result in more ground disturbance (approximately 926,300 cubic yards of excavation at a maximum depth of 45 feet below grade level). Therefore, the analysis approach is based on Scenario B.

3.5.3.4 Impacts and Mitigation Measures

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, strong seismic ground shaking, seismic-related ground failure, including liquefaction, or landslides (Less Than Significant).

Fault Rupture

As discussed previously under *Surface Fault Rupture*, the project site is not within the Alquist-Priolo Earthquake Fault Zone, and no known potentially active fault exists in the vicinity of the project site. Therefore, the project would not exacerbate the risk of surface fault rupture. This impact would be ***less than significant***. No mitigation is required.

Ground Shaking

As discussed above under *Seismic Ground Shaking*, the project site is in a seismically active area and the project site is expected to experience periodic minor earthquakes and a major earthquake (i.e., moment magnitude greater than 6) during the operational life of the project.[6] The proposed project would comply with the California Building Standards Code's seismic requirements, as enforced through the San Bruno Building Code. These requirements were established to reduce risks to life from damage to newly constructed buildings due to seismic hazards. Therefore, the project would not exacerbate the risk of ground shaking resulting from a seismic event. This impact would be ***less than significant***. No mitigation is required.

Liquefaction

As stated previously under *Liquefaction*, the project site is within a liquefaction hazard zone and layers of liquefiable soils were identified beneath the project site; however, the Preliminary Geotechnical Investigation noted that the layers of liquefiable material are relatively thin and discontinuous (Langan 2022). A design-level geotechnical report will include detailed analysis and provide recommendations regarding liquefiable soils; compliance with the recommendations in the design-level geotechnical report would be required as a condition of approval consistent with the City's design review and permitting process. In addition, adherence to *San Bruno General Plan* policies (HS-1, HS-3, and HS-7), as well as San Bruno Building Code requirements, would reduce impacts related to liquefaction to ***less than significant***.

Lateral Spreading

As stated previously under *Lateral Spreading*, the project site has a significant downslope toward a free face on the eastern boundary of the site, which could result in potential lateral spread. However, the potentially liquefiable soils underlying the project site are not continuous beneath the main site, and the northern parcel is relatively flat with low liquefaction potential (Langan 2022). In addition, the project would comply with the California Building Standards Code's seismic requirements as well as San Bruno Building Code requirements established to reduce risks to life from damage to

[6] A *strong* earthquake is defined on the Modified Mercalli Intensity scale as an VI. It would be felt by all and cause damage to weak plaster, adobe buildings, and some masonry buildings. A *violent* earthquake is defined on the Modified Mercalli Intensity scale as a IX. It could cause some masonry buildings to collapse and other buildings shift off their foundations (http://resilience.abag.ca.gov/shaking/mmi/).

newly constructed buildings due to seismic hazards. Therefore, the potential risk of lateral spreading is considered low and impacts related to lateral spreading would be ***less than significant***.

Seismic Settlement

As stated previously under *Seismic Settlement*, while loose to dense sand encountered underlying the project site could be subject to seismic densification during strong ground shaking, these soils are mostly located in planned excavation areas; therefore, the Preliminary Geotechnical Investigation considered the risk of seismic settlement at the project site to be low (Langan 2022). Furthermore, a design-level geotechnical report will include detailed analysis and provide recommendations regarding seismic settlement. With adherence to *San Bruno General Plan* policies, San Bruno Building Code requirements, and recommendations of the design-level geotechnical report, impacts related to seismic settlement would be reduced to ***less than significant***.

Seismically Induced Landslide

As stated previously under *Landslide*, the project site is relatively flat with a gentle slope from east to west. The nearest landslide zone is approximately 1.5 miles north of the project site. Therefore, the likelihood of a landslide at the project site is low, and the project would result in ***no impact*** related to landslides. No mitigation is required.

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

Construction

The project site slopes from west to east and lies with elevations ranging from approximately 36.5 to 66 feet (NAVD88)[7] at the main site and 38.5 to 44.5 feet (NAVD88) at the north parcel. Construction of the proposed project would require grading or disturbing an area of approximately 40 acres and excavating up to approximately 926,300 cubic yards of soil to a maximum depth of 45 feet below grade level under Scenario B. While the proposed project would involve changes to the existing grade, no unprotected, exposed soils at risk of substantial erosion would remain on the project site.

As discussed in Section 3.8, *Hydrology and Water Quality*, construction activities associated with the proposed project must comply with the National Pollutant Discharge Elimination System Construction General Permit, Municipal Regional Permit, and *San Bruno General Plan* and Municipal Code. These requirements include preparation and implementation of a stormwater pollution prevention plan (SWPPP) that incorporates best management practices (BMPs), such as the installation of erosion control measures (e.g., silt fences, staked straw bales/wattles, silt/sediment basins or traps), geofabric, sandbag dikes, covers for stockpiles, or storage precautions for outdoor material storage areas.

[7] The North American Vertical Datum of 1988 (NAVD 88) is the vertical control datum established in 1991 by the minimum-constraint adjustment of the Canadian-Mexican-United States leveling observations. It held fixed the height of the primary tidal benchmark, referenced to the new International Great Lakes Datum of 1985 local mean sea level height value, at Father Point/Rimouski, Quebec, Canada.

Therefore, with adherence to the BMPs included in the SWPPP, compliance with the City of San Bruno's conditions of approval regarding grading, compliance with the City of San Bruno's requirements for grading permits, adherence to standard construction BMPs, and compliance with the California Building Standards Code, construction impacts related to the proposed project's potential to result in substantial soil erosion would be ***less than significant***. No mitigation is required.

Operation

Implementation of the proposed project would involve a change in the proportion of impervious and pervious surfaces in both scenarios. The project would result in an estimated 0.8 acre (approximately 30 percent) increase in pervious surface, for both Scenario A and Scenario B on the project site. Both scenarios would therefore result in an increase in pervious surface area across the project site (Section 3.8, *Hydrology and Water Quality*). Consistent with C.3 requirements in the Municipal Regional Stormwater Permit (MRP), stormwater runoff from the project site would be treated through low impact development methods, which may consist of bioretention basins, pervious permeable pavements, and other site design features intended to manage stormwater runoff flow rates and volumes from the project site and to reduce stormwater pollution. These project features would avoid substantial soil erosion by implementing measures that would provide adequate drainage and stormwater runoff flow management for surface water.

Therefore, with adherence to C.3 requirements in the MRP, operational impacts related to the proposed project's potential to result in substantial soil erosion would be ***less than significant***. No mitigation is required.

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 (Less than Significant).

As stated previously under *Seismic Settlement*, analysis of project site borings concluded seismic densification could potentially occur in the loose to dense sand above the water table, resulting in up to 3 inches of seismic-induced settlement.

Weak soils can compress or subside under the weight of buildings and fill, causing settlement relative to the thickness of the weak soil. Usually the thickness of weak soil will vary and differential settlement will occur. Weak soils also tend to amplify shaking during an earthquake and can be susceptible to liquefaction. However, while the Preliminary Geotechnical Investigation determined that portions of the project site are underlain by moderately compressible medium stiff to hard clay, the report recommended ground improvements or the use of deep foundations to reduce impacts related to compressible soils. Therefore, the potential for settlement resulting from soil compression at the project site is low.

Sand boils and liquefaction-related ground fissure can occur when surface layers above the liquefiable soils are thin. The Preliminary Geotechnical Investigation concluded that liquefiable layers underlying the project site are not continuous and are relatively thin. Consequently, the project site should behave like a stiff soil site; therefore, the potential of sand boils or fissures during a seismic event is low.

Lateral spreading is a phenomenon in which a surficial soil displaces along a shear zone that has formed within an underlying liquefied layer. The Preliminary Geotechnical Investigation concluded that as the north parcel is relatively level, and while the main site has a significant downslope toward a free face as the underlying liquefiable soils are not continuous, the potential for lateral spreading at both sites is low.

As discussed under Impact GEO-1, the project site is relatively flat with a gentle slope from east to west and is approximately 1.5 miles from the nearest landslide zone; therefore, the proposed project would have no impacts with respect to landslides.

The Preliminary Geotechnical Investigation provides recommendations regarding design of foundations, floor slabs, and other geotechnical aspects of this project, which would reduce impacts related to unstable soils to be less than significant. A design-level geotechnical report will incorporate the recommendations in the Preliminary Geotechnical Investigation; compliance with the recommendations in the design-level geotechnical report would be required as a condition of approval consistent with the City's design review and permitting process. With the implementation of these recommendations, as well as compliance with the California Building Standards Code, impacts would be ***less than significant***. No mitigation measures are necessary.

Impact GEO-4: The project would not be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property (Less than Significant).

As stated previously under *Expansive Soils*, the project site is underlain with low to moderately expansive soils, with potentially highly expansive soils in the area near Sneath Lane and Huntington Avenue. The Preliminary Geotechnical Investigation recommends deepened footings or a thickened floor slab, along with possible subgrade preparation under foundations and slabs where these soils are present. A further detailed design-level geotechnical report will also be required and will contain specific recommendations for dealing with expansive soils. Compliance with the recommendations in the design-level geotechnical report would be required as a condition of approval consistent with the City's design review and permitting process. The project would comply with standard regulatory requirements, including completion of a detailed design-level geotechnical investigation as may be required for issuance of grading permits, and compliance with the California Building Code, which is adopted by reference under the City of San Bruno Building Code. Therefore, impacts would be ***less than significant*** related to expansive soils. No mitigation is required.

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

The proposed project would connect to San Bruno's existing sewer and stormwater collection and treatment system, including certain upgrades and modification to that system, as described in Chapter 2, *Project Description*. Therefore, the proposed project would not use a septic or alternative water disposal system and would have ***no impact*** relating to such systems. No mitigation is required.

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

As stated previously under *Paleontological Resources*, geologic units underlying the project site, specifically the Colma Formation, are known to have yielded significant vertebrate fossils. Therefore, the paleontological sensitivity of this geologic unit is considered to be high and has the potential to contain significant fossils at the project site.

Because paleontological resources exist below the ground surface, ground disturbances such as excavating, grading, and resurfacing could affect any paleontological resources that may be present. Therefore, it is possible for construction activities to directly or indirectly destroy any paleontological resources in the project site.

Excavation for the proposed project would vary in depth depending on area from 6 to 22 feet bgs.[8] Across the project site, an estimated 40 acres of ground surface would be disturbed. An estimated 926,300 cubic yards of soil would be excavated to a maximum depth of 45 feet below grade level under Scenario B. In addition, utility and circulation improvements would also require surface grading and trenching for utilities.

Destruction of any paleontological resources present in the project site would constitute a significant impact; however, implementation of **Mitigation Measure GEO-6** would reduce this potentially significant impact on paleontological resources to less than significant with mitigation by providing training for construction personnel related to the possibility of encountering fossils, requiring work to halt within 25 feet of any potential fossil find, and requiring a qualified paleontologist to evaluate and excavate any such find. Therefore, the impact would be ***less than significant with mitigation***.

Mitigation Measures

Mitigation Measure GEO-6: Provide Construction Personnel Training and Follow Unanticipated Paleontological Resources Discovery Protocol.

Prior to commencement of ground-disturbing activities, project personnel conducting ground-disturbing activities shall receive training regarding the potential for uncovering subsurface paleontological resources (a fossilized bone or other preserved plant or animal remains), work practices for implementing mitigation measures and complying with applicable laws and regulations, and how to recognize possible buried resources. The training shall include a presentation of procedures to follow upon discovery or suspected discovery of paleontological resources, their treatment (described below) and actions that may be taken if there is violation of applicable laws.

[8] The North American Vertical Datum of 1988 (NAVD 88) is the vertical control datum established in 1991 by the minimum-constraint adjustment of the Canadian-Mexican-United States leveling observations. It held fixed the height of the primary tidal benchmark, referenced to the new International Great Lakes Datum of 1985 local mean sea level height value, at Father Point/Rimouski, Quebec, Canada.

If a previously undiscovered paleontological resource is encountered during construction, ground-disturbing activity within 25 feet of the resource shall be stopped. A qualified paleontological resource specialist shall be retained to assess the significance of the find. An exclusion area shall be established with signage and protective barriers. Entry into the area shall be limited to authorized personnel and a qualified paleontological resource specialist, and the contractor shall immediately notify the City of San Bruno. Preservation in place (avoidance) is preferred mitigation for impacts on unique paleontological resources. No additional mitigation is necessary if the resource can be avoided, but the qualified paleontological resource specialist shall document the resource in accordance with professional standards such as *the Society of Vertebrate Paleontology Standard of Procedures for the Assessment of Adverse Impacts to Paleontological Resources* (SVP 2010). A significant paleontological resource under these standards is defined as follows.

> Significant paleontological resources are fossils and fossiliferous deposits, here defined as consisting of identifiable vertebrate fossils, large or small, uncommon invertebrate, plant, and trace fossils, and other data that provide taphonomic, taxonomic, phylogenetic, paleoecologic, stratigraphic, and/or biochronologic information. Paleontological resources are considered to be older than recorded human history and/or older than middle Holocene (i.e., older than about 5,000 radiocarbon years).

Work can resume if there is no potential for the resource to be a unique paleontological resource. If there is a potential for the resource to be a unique paleontological resource and it cannot be avoided, the qualified paleontological resource specialist shall identify mitigation measures, which may include ensuring that fossils are recovered, prepared, identified, catalogued, and analyzed consistent with current professional standards. Methods of recovery, testing, and evaluation shall adhere to current professional standards such as the *Society of Vertebrate Paleontology Standard of Procedures for the Assessment of Adverse Impacts to Paleontological Resources* (SVP 2010). Work can commence after data recovery.

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3.6 Greenhouse Gases

3.6.1 Introduction

This section evaluates the potential impacts on greenhouse gases (GHGs) that could result from construction and operation of the Tanforan Redevelopment Project (project). It also outlines existing conditions at the project site and the regulatory framework for this analysis. Additionally, it describes the impacts resulting from implementation of the project and feasible mitigation measures, where applicable.

Issues identified in response to the Notice of Preparation (NOP) (Appendix 1-1, *Notice of Preparation and Comments Received on the Notice of Preparation*) were considered in preparing this analysis. One NOP comment pertaining to greenhouse gases was received. The comment included a recommendation by Bay Area Rapid Transit to incorporate the Station Access Policy that is consistent with Bike/Ped Master Plans and Climate Action Plan. This issue is addressed in Section 3.6.3.4, *Impacts and Mitigation Measures*, under **Impact GHG-2**.

3.6.2 Existing Conditions

3.6.2.1 Regulatory Setting

This section summarizes regulations and policies that are relevant to the analysis of the project's potential impacts on GHGs.

Federal

Several federal executive orders (EOs) were signed by former President Joe Biden related to GHG emissions and climate resiliency. EO 13990, signed in January 2021, set a national goal to achieve a 50 to 52 percent reduction from 2005 levels in economy wide net GHG pollution in 2030. EO 14057, signed in December 2021, requires federal agencies to develop strategic processes for achieving, among other things, carbon-free electricity by 2030 and 100 percent zero-emissions vehicle (ZEV) acquisitions by 2035. Former President Biden also signed two bills, the Infrastructure Investment and Jobs Act (2021) and Inflation Reduction Act (2022), that provide funding for infrastructure improvements that will reduce GHG emissions and bolster resilience to climate change.

Recent actions by President Donald Trump have significantly altered the federal climate policy landscape. On January 20, 2025, Trump signed EO 14154, which includes pausing the disbursement of funds appropriated through the Inflation Reduction Act, targeting incentives for electric vehicles and other clean energy technologies. While some of the former administration's policies remain, the new EOs represent a shift away from the previous focus on reducing GHG emissions and increasing climate resiliency.

There is currently no federal law or legislatively mandated national GHG reduction target.

Corporate Average Fuel Economy Standards

The National Highway Traffic Safety Administration (NHTSA) and U.S. Environmental Protection Agency (EPA) set corporate average fuel economy (CAFE) standards for passenger cars and light trucks (collectively, light-duty vehicles), and separately sets fuel consumption standards for medium- and heavy-duty trucks and engines. The current CAFE standards require an industry-wide fleet average of approximately 49 miles per gallon (mpg) for passenger cars and light trucks in model year 2026, by increasing fuel efficiency by 8 percent annually for model years 2024 and 2025, and 10 percent annually for model year 2026. Phase 2 of the Greenhouse Gas Emissions Standards and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles applies to model years 2019 through 2027 medium- and heavy-duty vehicles.

In June 2024, NHTSA issued the final CAFE standards for passenger cars and light trucks and fuel efficiency standards for model years 2027 through 2031 that increase at a rate of 2 percent per year for passenger cars and light trucks. The proposal also includes new fuel efficiency standards for heavy-duty pickup trucks and vans for model years 2030 through 2032 and 2033 through 2035 that increase at a rate of 10 percent per year and 8 percent per year, respectively.

With the change in federal administration in January 2025, it is likely that NHTSA will propose changes to the CAFE standards. However, no revisions have been formally proposed yet, and revisions will need to go through the lengthy rule-making process.

State

Statewide Greenhouse Gas Emissions Targets and the Climate Change Scoping Plan

California has adopted statewide legislation addressing various aspects of climate change and GHG emissions mitigation. Much of this legislation establishes a broad framework for the state's long-term GHG reduction and climate change adaptation program. Senate Bill (SB) 32 requires the state to reduce emissions to 40 percent below the 1990 level by 2030. Assembly Bill (AB) 1279 requires California to achieve net-zero GHG emissions (i.e., reach a balance between the GHGs emitted and removed from the atmosphere) no later than 2045 and to achieve and maintain net negative GHG emissions from then on. It also mandates an 85 percent reduction in statewide anthropogenic GHG emissions (from 1990 levels) by 2045. AB 1279 requires state agencies aim to achieve net-zero GHG emissions resulting from their operations no later than 2035, or as soon as feasible thereafter.

The state's plan to reach these targets is presented in periodic scoping plans. The California Air Resources Board (CARB) (2017a) adopted the *2017 Climate Change Scoping Plan* in November 2017 to meet the GHG reduction requirement set forth in SB 32. It proposes continuing the major programs of the previous scoping plan, including Cap-and-Trade Regulation; low-carbon fuel standards; more efficient cars, trucks, and freight movement; Renewables Portfolio Standard; and a reduction of methane emissions from agricultural and other wastes. CARB (2022a) finalized the *2022 Scoping Plan for Achieving Carbon Neutrality* (2022 Scoping Plan) in November 2022 to identify a technologically feasible, cost-effective, and equity-focused path to achieve carbon neutrality by 2045, pursuant to AB 1279. The plan also assesses the state's progress toward meeting the GHG emissions reduction goal called for in SB 32.

The state has also passed the following more detailed legislation to address GHG emissions associated with transportation, electricity generation, and energy consumption.

Vehicle Efficiency and Zero-Emissions Standards

AB 1493 (Pavley I) required CARB to develop and implement regulations to reduce automobile and light-truck GHG emissions. These stricter emissions standards were designed to apply to automobiles and light trucks beginning with model year 2009. Additional strengthening of the Pavley standards (referred to previously as Pavley II and now referred to as the Advanced Clean Cars measure) was adopted for vehicle model years 2017 through 2025 in 2012. Together, the two standards are expected to increase average fuel economy to roughly 54.5 mpg in 2025.

In August 2022, CARB voted to approve the Advanced Clean Cars II proposal, which would dramatically reduce emissions from passenger cars for model years 2026 through 2035. This requires an increasing proportion of new vehicles to be ZEVs, with the goal of 100 percent ZEVs for new vehicles sold by 2035 (CARB 2024d). The future of this proposal is uncertain, however, because of the change in the federal administration.

CARB also adopted the Advanced Clean Truck Regulation to accelerate a large-scale transition of medium- and heavy-duty ZEVs. The regulation requires the sale of medium- and heavy-duty ZEVs as an increasing percentage of total annual California sales from 2024 to 2035. By 2035, zero-emissions truck/chassis sales would need to be 55 percent of Class 2b–3 truck sales, 75 percent of Class 4–8 straight truck sales, and 40 percent of truck tractor sales. By 2045, every new medium- and heavy-duty truck sold in California would be zero-emissions. Large employers including retailers, manufacturers, brokers, and others are required to report information about shipments and shuttle services to better ensure that fleets purchase available zero-emissions trucks. This regulation was withdrawn by CARB in January 2025 (CalMatters 2025) because of the change in the federal administration.

Low-Carbon Fuel Standard

With EO S-01-07, Governor Schwarzenegger set forth the low-carbon fuel standard for California in 2007, leading to approval of the low-carbon fuel standard regulation in 2009. In 2018, CARB–approved amendments to the regulation strengthening the carbon intensity benchmarks through 2030 in line with California's 2030 SB 32 GHG emissions reduction target (CARB 2024c). Under the low-carbon fuel standard, the carbon intensity of California’s transportation fuels is to be reduced by at least 20 percent by 2030.

Legislation Associated with Electricity Generation

The state passed legislation that requires increasing use of renewables to produce electricity for consumers. Specifically, California utilities are required to generate 44 percent of their electricity from renewables by 2024 (SB 100[1]), 50 percent by 2026 (SB 100), 52 percent by 2027 (SB 100), 60 percent by 2030 (SB 100), 90 percent by 2035 (SB 1020), 95 percent by 2040 (SB 1020[2]), and 100 percent by 2045 (SB 100/SB 1020). SB 1020 also requires state agencies to rely on 100 percent renewable energy and zero-carbon resources to serve their own facilities by 2035.

[1] De León, Statutes of 2018, Public Utilities Code sections 399.11, 399.15, and 399.30.

[2] Clean Energy, Jobs, and Affordability Act of 2022, Statutes of 2022, Public Utilities Code sections 454.59 and 739.13.

Building Energy Efficiency Standards (Title 24, Part 6)

As mentioned in Section 3.1, *Air Quality*, the energy consumption of new residential and nonresidential buildings in California is regulated by the California Code of Regulations (CCR), Title 24, Part 6, the California Energy Code, and Part 11, California Green Building Standards Code (CALGreen). The California Energy Commission updates the California Energy Code every 3 years with more stringent design requirements to reduce energy consumption, resulting in lower GHG emissions. The 2022 California Energy Code, which took effect on January 1, 2023, requires builders to use more energy-efficient building technologies to comply with requirements regarding energy use than required by the 2019 version of the Energy Code. Similarly, CALGreen is updated every 3 years; the 2022 version of CALGreen took effect on January 1, 2023, with a supplemental edition taking effect on July 1, 2024. CALGreen includes regulations for energy efficiency, water efficiency and conservation, material conservation, and resource efficiency.

CALGreen Sections A5.106.5.3 and A4.106.4.2 include electric-vehicle (EV) charging requirements for new nonresidential and residential development, respectively. For nonresidential uses, CALGreen Tier 2 requires 45 percent of the total parking spaces to be EV Capable and 33 percent of EV Capable spaces to be EV charging stations. For multifamily residential uses and hotels and motels, CALGreen Tier 2 requires 40 percent of the total parking spaces to be EV Ready and 15 percent of the total spaces to be equipped with Level 2 EV supply equipment.

Regional and Local

Metropolitan Transportation Commission

The Metropolitan Transportation Commission (MTC) is the metropolitan planning organization for the nine counties that make up the San Francisco Bay Area and the San Francisco Bay Area Air Basin (SFBAAB), including the City of San Bruno. The first per capita GHG emissions reduction targets for the SFBAAB were 7 percent by 2020 and 15 percent by 2035 relative to 2005 levels. In 2013, MTC adopted a Sustainable Communities Strategy (SCS) as part of its Regional Transportation Plan (RTP) for the SFBAAB. This was known as *Plan Bay Area*, and it went beyond regional per capita targets, calling for 10 and 16 percent reductions in per capita GHG emissions by 2020 and 2035, respectively (MTC/ABAG 2013). On July 26, 2017, the strategic update to this plan, known as *Plan Bay Area 2040*, was adopted by the Association of Bay Area Governments (ABAG) and the MTC. As a limited and focused update, *Plan Bay Area 2040* builds upon the growth pattern and strategies developed in *Plan Bay Area* but with updated planning assumptions that incorporate the key economic, demographic, and financial trends since 2013 (MTC/ABAG 2017). As required by SB 375, CARB updated the per capita GHG emissions reduction targets in 2018. The new targets (i.e., reductions in per capita GHG emissions of 10 percent by 2020 and 19 percent by 2035 relative to 2005 levels) are addressed in the latest update to *Plan Bay Area*, *Plan Bay Area 2050*, which was approved by ABAG and the MTC in October 2021. *Plan Bay Area 2050* carries forward many of the development and funding strategies of Plan Bay Area 2040 (MTC/ABAG 2021a).

Bay Area Air District

The Bay Area Air District (Air District)[3] is the primary agency responsible for addressing air quality concerns in the San Francisco Bay Area, including San Mateo County. Its role is discussed further in Section 3.1, *Air Quality*. The Air District also recommends methods for analyzing project-related GHGs in California Environmental Quality Act (CEQA) analyses as well as multiple GHG reduction measures for land use development projects.

The Air District has formally adopted updated CEQA GHG thresholds, which serve as an update to the CEQA GHG thresholds from the Air District's previous CEQA Guidelines released in 2017. The updated CEQA GHG thresholds are presented in the Air District's *California Environmental Quality Act Air Quality Guidelines* (CEQA Guidelines) (BAAQMD 2023). The GHG significance thresholds were updated to consider the 2030 state reduction target (e.g., SB 32) and 2045 carbon neutrality target (e.g., EO B-55-18), as well as evolving case law. In summary, the updated thresholds emphasize (1) avoiding wasting electricity and developing fossil fuel infrastructure in new buildings that will be in place for decades and, thus, conflict with carbon neutrality by 2045; (2) compliance with the 2022 California Green Building Standards Code, Title 24, Part 11 (CALGreen) Tier 2 electric vehicle requirements and per capita vehicle miles traveled (VMT) reductions consistent with SB 743; and (3) consistency with a qualified greenhouse reduction strategy (also known as a Climate Action Plan).

Overall, the Air District's CEQA Guidelines include guidance for evaluating plan- and project-level air quality and climate impacts, as well as best practices for centering environmental justice, health, and equity thresholds for evaluating a project's impact on air quality (BAAQMD 2023). The evidence for use of the updated GHG thresholds is provided in Appendix B of the Air District's CEQA Guidelines. The evidence provided in Appendix B underpins the use of the Air District's updated GHG thresholds and the recommendations for assessing project-level climate impacts. This analysis was prepared to be consistent with guidance and recommendations from the Air District's CEQA Guidelines.

City of San Bruno General Plan

The *San Bruno General Plan*, adopted in 2009, includes goals and policies that relate to climate change and GHG emissions reduction (City of San Bruno 2009). The plan includes the following goals and policies, adopted for the purpose of avoiding or minimizing environmental effects, that are associated with climate change and GHG emissions reductions and relevant to the project.[4]

- **ERC-28.** Incorporate air quality beneficial programs and policies into local planning and development activities, with a particular focus on subdivision, zoning, and site design measures that reduce the number and length of single-occupant automobile trips.
- **ERC-30.** Encourage new residential developments to incorporate measures such as shuttle services to major employment centers, commercial areas and transit areas, and provision of adequate transit facilities.
- **ERC-33.** Require all large construction projects to mitigate diesel exhaust emissions through use of alternate fuels and control devices.

[3] The Bay Area Air Quality Management District changed its name to the Bay Area Air District in January 2025 and will be referred to as the Bay Area Air District or simply the Air District herein.

[4] The *San Bruno General Plan* also includes policies associated with transportation, such as encouraging transportation alternatives, such as walking, bicycling, carpooling, transit-ridership, and flex-scheduling, which reduce transportation-related GHG emissions.

In addition, the City has identified policies relevant to climate change and sustainability in the Land Use and Urban Design; Transportation; Open Space and Recreation; Environmental Resources and Conservation; Health and Safety; and Public Facilities and Services elements of the general plan. Though these policies do not directly address GHG emissions, they aim to promote sustainable development practices such as protecting the natural environment, encouraging mixed-used development, and implementing best management practices (e.g., water conservation). These sustainability practices may contribute to GHG emissions reduction. The project's consistency with applicable goals and policies in the *San Bruno General Plan* is evaluated in Section 3.9, *Land Use*.

City of San Bruno Reach Code

As part of the 2022 California Energy Code update, as described above, the City has adopted local amendments related to building electrification and electric vehicle infrastructure that are more stringent than the state's adopted standards. These amendments are codified in the City's Municipal Code, Chapters 11.06 and 11.07.

3.6.2.2 Environmental Setting

Regional Setting

Global Climate Change

The process known as the *greenhouse effect* keeps the atmosphere near Earth's surface warm enough for the successful habitation of humans and other life forms. The greenhouse effect is created by sunlight that passes through the atmosphere. Some of the sunlight striking Earth is absorbed and converted to heat, which warms the surface. The surface emits a portion of this heat as infrared radiation, some of which is re-emitted toward the atmosphere by GHGs. Human activities that generate GHGs increase the amount of infrared radiation absorbed by the atmosphere, thereby enhancing the greenhouse effect and amplifying the warming of Earth.

Increases in fossil fuel combustion and deforestation have exponentially increased concentrations of GHGs in the atmosphere since the Industrial Revolution (IPCC 2007). Rising atmospheric concentrations of GHGs, in excess of natural levels, have resulted in increasing global surface temperatures—a process commonly referred to as *global warming*. Higher global surface temperatures have, in turn, resulted in changes to Earth's climate system, including increases in ocean temperature and acidity, reduced sea ice, variable precipitation, and increases in the frequency and intensity of extreme weather events (IPCC 2018a). Large-scale changes to Earth's system are collectively referred to as *climate change*.

The Intergovernmental Panel on Climate Change (IPCC) was established by the World Meteorological Organization and United Nations Environment Programme to assess scientific, technical, and socioeconomic information relevant to the understanding of climate change, its potential impacts, and options for adaptation and mitigation. The IPCC estimates that human-induced warming resulted in an increase of approximately 1.07 degree Celsius (°C) above pre-industrial levels from 2010 to 2019 and is increasing at a rate of 0.2°C per decade. Under the current nationally determined contributions of mitigation from each country until 2030, global warming is expected to rise to 3°C by 2100 and continue afterward (IPCC 2018a, 2021). Large increases in global temperatures could have substantial adverse effects on the natural and human environments in California and worldwide.

Climate change is a global problem. GHGs are global pollutants, unlike criteria air pollutants and toxic air contaminants, which are pollutants of regional and local concern. Whereas most pollutants with localized air quality effects have relatively short atmospheric lifetimes (approximately 1 day), GHGs have long atmospheric lifetimes (1 year to several thousand years). GHGs persist in the atmosphere long enough to be dispersed around the globe. Although the lifetime of any GHG molecule depends on multiple variables and cannot be determined with any certainty, it is understood that more carbon dioxide (CO_2) is emitted into the atmosphere than is removed from the atmosphere (i.e., sequestered) by ocean uptake, vegetation, and other forms of sequestration.

No single project alone would measurably contribute to an incremental change in the global average temperature or to global or local climates or microclimates. From the standpoint of CEQA, GHG impacts relative to global climate change are inherently cumulative.

Principal Greenhouse Gases

The principle anthropogenic (human-made) GHGs are CO_2, methane (CH_4), nitrous oxide (N_2O), and fluorinated compounds, including sulfur hexafluoride, hydrofluorocarbons (HFCs), and perfluorocarbons. The primary GHGs that would be emitted by project-related construction and operations include CO_2, CH_4, and N_2O. The principal characteristics of these pollutants are discussed here.

CO_2 enters the atmosphere through the combustion of fossil fuel (i.e., oil, natural gas, coal), solid waste decomposition, plant and animal respiration, and chemical reactions (e.g., from manufacturing cement). CO_2 is also removed from the atmosphere, or sequestered, when it is absorbed by plants as part of the biological carbon cycle.

CH_4 is emitted during the production and transport of coal, natural gas, and oil. CH_4 emissions also result from livestock and agricultural practices as well as the anaerobic decay of organic waste in municipal solid waste landfills.

N_2O is emitted by agricultural and industrial activities as well as the combustion of fossil fuels and solid waste.

Methods have been established to describe emissions of GHGs in terms of a single gas to simplify reporting and analysis. The most commonly accepted method for comparing GHG emissions is the global warming potential (GWP) methodology defined in IPCC reference documents. IPCC defines the GWP of various GHG emissions on a normalized scale that recasts all GHG emissions in terms of carbon dioxide equivalent (CO_2e), which compares the gas in question to that of the same mass of CO_2. By definition, CO_2 has a GWP of 1.

Table 3.6-1 lists the GWP of CO_2, CH_4, and N_2O and their lifetimes in the atmosphere.

Table 3.6-1. Lifetimes and Global Warming Potentials of Key Greenhouse Gases

Greenhouse Gas	Global Warming Potential (100 years)	Lifetime (years)
Carbon dioxide (CO_2)	1	-- [a]
Methane (CH_4)	25	12
Nitrous oxide (N_2O)	298	114

Source: CARB 2024b.

[a] No lifetime (years) for CO_2 was presented by CARB.

CARB recognizes the importance of reducing emissions of short-lived climate pollutants to achieve the state's overall climate change goals. Short-lived climate pollutants have atmospheric lifetimes on the order of a few days to a few decades, and their relative climate-forcing impacts, when measured in terms of how they heat the atmosphere, can be tens, hundreds, or even thousands of times greater than that of CO_2 (CARB 2017b). Given their short-term lifespan and warming impact, short-lived climate pollutants are measured in terms of CO_2e using a 20-year period. The use of GWPs with a time horizon of 20 years captures the importance of the short-lived climate pollutants and gives a better perspective as to the speed at which emissions controls will affect the atmosphere relative to CO_2 emissions controls. CH_4 has a lifetime of 12 years and a 20-year GWP of 72. HFC gases have lifetimes of 1.4 to 52 years and a 20-year GWP of 437 to 6,350. Anthropogenic black carbon has a lifetime of a few days to weeks and a 20-year GWP of 3,200 (CARB 2017b).

Greenhouse Gas Reporting

A GHG inventory is a quantification of all GHG emissions and sinks[5] within a selected physical and/or economic boundary. GHG inventories can be performed on a large scale (e.g., for global and national entities) or on a small scale (e.g., for a building or person). Several agencies have developed emissions inventories, which provide comprehensive accounts of total GHG emissions at varying scales, and tools for quantifying emissions from specific sources. Table 3.6-2 shows results of the most current emissions inventories at the international, national, state, regional, and city levels, as quantified by the IPCC, EPA, CARB, Bay Area Air District, and the City of San Bruno, respectively.

Table 3.6-2. Global, National, State, and Local Greenhouse Gas Emissions Inventories

Emissions Inventory	CO^2e (metric tons)
2017 IPCC Global GHG Emissions Inventory	53,500,000,000
2022 EPA National GHG Emissions Inventory	6,343,200,000
2022 CARB State GHG Emissions Inventory	371,100,000
2015 Bay Area Air District GHG Emissions Inventory	84,700,000
2015 City of San Bruno GHG Emissions Inventory	248,098

Sources: IPCC 2018b; EPA 2024; CARB 2024a; BAAQMD 2017; County of San Mateo 2019.

Potential Climate Change Effects

Climate change is a complex process that has the potential to alter local climatic patterns and meteorology. Although modeling indicates that climate change will result in sea level rise, both globally and in San Francisco Bay, as well as changes in climate and rainfall, among other effects, there remains uncertainty about characterizing precise local climate characteristics and predicting precisely how various ecological and social systems will react to changes in the existing climate at the local level. Regardless of this uncertainty, it is widely understood that substantial climate change has occurred and will continue to occur in the future, although the precise extent will take further research to define.

[5] A GHG sink is a process, activity, or mechanism that removes a GHG from the atmosphere.

The effects from global climate change in California specifically and worldwide include the following.

- Declining sea ice and mountain snowpack levels, thereby increasing sea levels and sea surface evaporation rates, with a corresponding increase in atmospheric water vapor due to the atmosphere's ability to hold more water vapor at higher temperatures (CNRA 2018).
- Rising average global sea levels, due primarily to thermal expansion in the oceans and the melting of glaciers, ice caps, and the Greenland and Antarctic ice sheets (IPCC 2018a).
- Changing weather patterns, including changes in precipitation and wind patterns, and more energetic episodes of extreme weather, including droughts, heavy precipitation, heat waves, extreme cold, and intense tropical cyclones (IPCC 2018a).
- Declining Sierra Nevada snowpack levels, which account for approximately half of the surface water storage in California. Snow levels could decline by 70 to as much as 90 percent over the next 100 years (CNRA 2018).
- Increases in the number of days that could be conducive to ground-level ozone formation (e.g., clear days with intense sunlight) by the end of the 21st century in areas with high levels of ozone. The number of days could increase by 25 to 85 percent, depending on the future temperature scenario (CNRA 2018).
- Increases in the potential for erosion of California's coastlines as well as seawater intrusion into the Sacramento Delta and associated levee systems due to the rise in sea level (CNRA 2018).
- Exacerbation of the severity of drought conditions in California (e.g., durations and intensities could be amplified, ultimately increasing the risk of wildfires and consequential damage) (CNRA 2018).
- Under changing climate conditions, lower agricultural crop yields due to extreme heat waves, heat stress, increased water needs of crops and livestock (particularly during dry and warm years), and new and changing pest and disease threats (CNRA 2018).

The impacts of climate change, such as increases in the number of heat-related events, droughts, and wildfires, pose direct and indirect risks to public health, with people experiencing worsening episodes of illness and earlier deaths. Indirect impacts on public health include increases in incidents of vector-borne diseases, stress, and mental trauma due to extreme events and disasters, economic disruptions, and residential displacement (CNRA 2018).

Project Site

The existing retail uses on the project site contribute to GHG emissions, primarily from motor vehicles traveling to and from the project site. Operational activities at the existing uses also generate direct and indirect GHG emissions associated with water consumption, energy use, solid waste generation, landscape maintenance, refrigerant use, and stationary sources.

3.6.3 Environmental Impact Analysis

This section describes the environmental impacts of the project on GHGs. It describes the thresholds used to determine whether an impact would be significant and methods used to evaluate the impacts. Measures to mitigate significant impacts are provided, where appropriate.

3.6.3.1 Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, the project would have the potential to result in a significant effect on greenhouse gases if it would result in any of the following conditions.

a. Impact GHG-1: Generation of greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

b. Impact GHG-2: Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

CEQA Guidelines Section 15064.4(b) also states that, when assessing the significance of impacts from GHG emissions, a lead agency should consider (1) the extent to which a project may increase or reduce GHG emissions compared with existing conditions, (2) whether a project's GHG emissions would exceed a threshold of significance that the lead agency has determined to be applicable to the project, and (3) the extent to which a project would comply with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. These three factors are considered when identifying an appropriate approach to determine the significance of the project's construction and operational GHG emissions.

Construction-Generated Emissions of Greenhouse Gases

The Air District's CEQA Guidelines do not identify a threshold for construction-related GHG emissions (BAAQMD 2023). However, they still recommend quantifying and disclosing construction GHG emissions. Even though the Air District's CEQA Guidelines do not determine a significance threshold for construction GHG emissions, they do recommend best management practices (BMPs) that projects should incorporate to reduce construction GHG emissions (BAAQMD 2023).

Operational Emissions of Greenhouse Gases

According to the CEQA Guidelines, the Air District recommends that a GHG analysis focus on a project's impact on the state's efforts to meet long-term climate goals. If a project would contribute its "fair share"[6] of what will be required to achieve those long-term climate goals, then a reviewing agency can find that the impact would not be significant because the project would help to solve the problem of global climate change (BAAQMD 2022). Applying this approach, the Air District has found that a new land use development project being built today needs to incorporate the design elements in Table 3.6-3 to do its fair share toward meeting the SB 32 2030 target and the goal of carbon neutrality by 2045.

[6] Bay Area Air District defines "fair share" as the design elements that need to be incorporated into a project to lay the foundation for achieving carbon neutrality by 2045. These design elements are elements over which the project has influence or control. For example, becoming carbon neutral by 2045 will require California's electrical power generators to shift to 100-percent carbon-free energy resources, which is not something that can be controlled through the design of new land use projects, and would not be a part of a project's fair share. Other sources that would not be part of the fair share are the types of vehicles that will be used onsite or indirect offsite emissions (e.g., methane emissions from wastewater or solid waste).

Table 3.6-3. Bay Area Air District Greenhouse Gas Thresholds for Land Use Projects

Thresholds for Land Use Projects (Must Include A or B)
A. Projects must include, at a minimum, the following project design elements: 1. Buildings a. The project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development). b. The project will not result in any wasteful, inefficient, or unnecessary electrical usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the CEQA Guidelines. 2. Transportation a. Achieve a reduction in project-generated VMT below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted Senate Bill 743 VMT target, reflecting the recommendations provided in the Governor's Office of Planning and Research's Technical Advisory on Evaluating Transportation Impacts in CEQA: i. Residential projects: 15 percent below the existing VMT per capita ii. Office projects: 15 percent below the existing VMT per employee iii. Retail projects: no net increase in existing VMT b. Achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.
B. Projects must be consistent with a local GHG reduction strategy that meets the criteria under CEQA Guidelines Section 15183.5(b).

Source: BAAQMD 2023.
CEQA = California Environmental Policy Act; VMT = vehicle miles traveled; CALGreen = California Green Building Standards Code; GHG = greenhouse gas.

If a project is designed and built to incorporate the design elements listed in Table 3.6-3 (Threshold Option A) or is consistent with a local GHG reduction strategy under CEQA Guidelines Section 15183.5 (Threshold Option B), then it would contribute its portion of what is necessary to achieve California's long-term climate goals—its fair share—and would not make a cumulatively considerable contribution to global climate change. If the project does not incorporate these design elements and is not consistent with a local GHG reduction strategy, then it should be found to have a significant climate impact because it would hinder the state's efforts to address climate change.

Because the City of San Bruno does not have a Climate Action Plan that is considered a local GHG reduction strategy per CEQA Guidelines Section 15183.5, this analysis evaluates the project's consistency with the design elements (Threshold Option A) to determine the significance of the project's GHG emissions.

3.6.3.2 Methodology and Approach

Construction

During project construction, emissions would be released in the form of exhaust from off-road equipment; exhaust from employee vehicles, vendor trucks, and haul trucks. Short-term GHG emissions generated by project construction were calculated using CalEEMod Version 2022.1.1.28, as recommended by Bay Area Air District and other air districts in California (CAPCOA 2022). Modeling was based on project-specific information where available, including demolition and earthwork quantities, building sizes and use types, a construction equipment inventory and construction phase durations, and vehicle trip lengths and quantities. Default values from CalEEMod,

which are generated by the model based on a project's location and proposed land uses, were also used for some parameters. For GHG emissions from on-road vehicles, CalEEMod uses vehicle emission factors from CARB's EMFAC2021 model. Detailed model assumptions and inputs for the calculations can be found in Appendix 3.1-1, *Air Quality and Greenhouse Gas Technical Appendix*.

Operations

During operations, the largest source of GHG emissions would be motor vehicles traveling to and from the project site. These emissions were estimated using traffic data provided by Fehr & Peers (Appendix 3.14-1, *Transportation Analysis Summary*) and emissions factors from CARB's EMFAC2021 (via CalEEMod). Traffic data were entered into the mobile-source module of CalEEMod to estimate GHG emissions resulting from project-related vehicle trips.

GHG emissions associated with water consumption, electricity use, solid waste generation, landscape maintenance, refrigerant use, and stationary sources were estimated using the corresponding modules of CalEEMod. Emissions associated with onsite water consumption were estimated using data provided by West Yost (Appendix 3.16-1, *Water Supply Assessment*) and default assumptions from CalEEMod. Default waste generation rates in CalEEMod were used to estimate GHG emissions from waste generation. For the project's electricity consumption, applicant-provided estimates of approximately 111,000,000 and 91,000,000 kilowatt hours per year under Scenario A (Research and Development [R&D] Scenario) and Scenario B (Residential Scenario), respectively, were used (Hofstetter pers. comm.). Carbon intensity factors for Peninsula Clean Energy (PCE), which would supply electricity to the project site, are included in CalEEMod for multiple years.[7] For the project analysis, the PCE GHG intensity factors used to model emissions represent the first year of full buildout (2034). As PCE's electricity products will be carbon free in 2034, the corresponding GHG intensity factors are zero, so the project's electricity consumption would not be a source of GHG emissions (PCE 2023).

Stationary-source emissions associated with the diesel-powered emergency generators proposed under Scenario A and Scenario B (19 and 17 generators, respectively) were also estimated using CalEEMod. Each generator is expected to operate up to 50 hours per year, including 8 hours for testing and maintenance and 42 hours for emergency use. As detailed in Section 3.1, *Air Quality*, default emissions factors were applied for generators under 1,000 horsepower, while Tier 4 emissions factors were used for those equal to or greater than 1,000 horsepower.

There are existing uses on the project site that generate emissions, which would be removed with implementation of the project. As such, the net effect of the project would be the difference between existing uses and project uses. Emissions generated by the existing uses were also estimated using CalEEMod. Modeling was based on project-specific information where available, including existing building sizes and use types, water consumption data provided by West Yost (Appendix 3.16-1, *Water Supply Assessment*), and trip generation data from Fehr & Peers (Appendix 3.14-1, *Transportation Analysis Summary*). As with the analysis of the project, default values from CalEEMod

[7] Since PCE is the default electricity provider for San Mateo County, as discussed in Section 3.4, *Energy*, it is reasonable to assume that PCE would supply electricity to the project site. Although PCE's customer opt-out rate was reported to be 2.5 percent in 2019, recent opt-out rates are not available (Moody's Investor's Service 2019). Nevertheless, customer opt-out rates are expected to remain very low, and without more current data from PCE, the number of customers opting out over the project's buildout period is not reasonably foreseeable. Furthermore, even if some customers do opt out, the difference in emissions would be minimal, given that state legislation requires California utilities to generate 90 percent of their electricity from renewables by 2035 (SB 1020).

were used for some parameters. Net project emissions were calculated by subtracting existing year 2025 operational GHG emissions from full buildout year 2034 emissions.

Detailed model assumptions and inputs for the calculations can be found in Appendix 3.1-1, *Air Quality and Greenhouse Gas Technical Appendix*.

3.6.3.3 Buildout Scenario Evaluated

As discussed in Section 3.0.3.1, *Buildout Scenarios*, for each resource area studied, the EIR evaluates the scenario with the greatest potential to result in a significant impact. In some cases, impacts would be the same regardless of the buildout scenario, so the analysis does not evaluate a specific buildout scenario. This approach ensures that the EIR identifies the maximum potential impacts of the project based on reasonably foreseeable development outcomes. Table 3.6-4 summarizes the approach used for each impact analysis related to GHGs.

Table 3.6-4. Impact Analysis Approach for Greenhouse Gases

Impact Criteria	Scenario A	Scenario B	EIR Approach
Impact GHG-1: Generation of greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Scenario A has more life science laboratory and office and more amenity use.	Scenario B has more residential and hotel use.	Same for both scenarios. Both scenarios have the potential to conflict with the Air District's land use threshold design elements related to transportation electrification, VMT reduction, and building decarbonization. Though the quantity of GHG emissions is not used to determine significance, Scenario B would generate slightly higher GHG emissions due to its greater number of daily vehicle trips. As a result, GHG emissions for Scenario B are detailed below, with emissions for both scenarios available in Appendix 3.1-1. However, the evaluation regarding consistency with the Air District's land use threshold design elements, which is used to determine significance, applies to both scenarios. Therefore, the analysis approach is not based on one scenario or the other, and accounts for any future development that could occur under the project.
Impact GHG-2: Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Scenario A has more life science laboratory and office and more amenity use.	Scenario B has more residential and hotel use.	Same for both scenarios. Both scenarios have the potential to conflict with state and regional GHG plans and strategies. The evaluation regarding consistency with CARB's 2022 Scoping Plan and MTC/ABAG's Plan Bay Area 2050 is not based on one scenario or the other, and accounts for any future development that could occur under the project.

ABAG = Association of Bay Area Governments; CARB = California Air Resources Board; GHG = greenhouse gas; MTC = Metropolitan Transportation Commission; VMT = vehicle miles traveled

3.6.3.4 Impacts and Mitigation Measures

Impact GHG-1: The project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment (Less Than Significant).

Construction

Project construction activities would require the operation of mobile and stationary construction equipment and on-road vehicles, including haul trucks for demolition debris removal, vendor trucks for deliveries, and employee vehicles for workers to commute to the site. Construction GHG emissions from each source vary substantially depending on the specific construction phase, daily construction operations, types of equipment, and number of personnel at the site. Based on modeling conducted with CalEEMod, it is estimated that project-related construction would generate approximately 16,718 metric tons of carbon dioxide equivalent ($MTCO_2e$) over the construction period (2026–2033) under Scenario B. Emissions for Scenario B would be higher than Scenario A, and detailed emissions for both scenarios can be found in Appendix 3.1-1, *Air Quality and Greenhouse Gas Technical Appendix*. The model assumptions, inputs, and output files are also provided in Appendix 3.1-1.

As mentioned previously, the Air District has not established a quantitative threshold for assessing construction GHG emissions, noting that the emissions are temporary and variable (BAAQMD 2023). Thus, the significance of the project's GHG impact is determined based on the potential for project operations to generate GHG emissions that may have a significant impact on the environment. Nonetheless, the project would incorporate the following Air District-recommended BMPs to reduce GHG emissions associated with construction.

- Use zero-emissions and hybrid-powered equipment to the greatest extent possible, particularly if emissions are occurring near sensitive receptors or located within a Bay Area Air District-designated Community Air Risk Evaluation area or AB 617 community.
- Require all diesel-fueled off-road construction equipment be equipped with EPA Tier 4 Final compliant engines or better as a condition of contract (see **Mitigation Measure AQ-2-A** in Section 3.1, *Air Quality*).
- Require all on-road heavy-duty trucks to be zero-emissions or meet the most stringent emissions standard, such as model years 2024 to 2026, to the extent feasible, as a condition of contract.
- Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to no more than 2 minutes (a 5-minute limit is required by the state airborne toxics control measure [13, CCR 2449(d)(3) and 2485]). Provide clear signage that posts this requirement for workers at the entrances to the site and develop an enforceable mechanism to monitor idling time to ensure compliance with this measure (see **Mitigation Measure AQ-2-C** in Section 3.1, *Air Quality*).
- Prohibit off-road diesel-powered equipment from being in the "on" position for more than 10 hours per day.
- Use CARB–approved renewable diesel fuel in off-road construction equipment and on-road trucks.
- Use EPA SmartWay-certified trucks for deliveries and equipment transport.

- Require all construction equipment be maintained and properly tuned in accordance with manufacturer's specifications. Equipment should be checked by a certified mechanic and determined to be running in proper condition prior to operation (see **Mitigation Measure AQ-2-C** in Section 3.1, *Air Quality*).
- Where grid power is available, prohibit portable diesel engines and provide electrical hookups for electric construction tools, such as saws, drills and compressors, and using electric tools whenever feasible.
- Where grid power is not available, use alternative fuels, such as propane or solar electrical power, for generators at construction sites as feasible.
- Encourage and provide carpools, shuttle vans, transit passes, and/or secure bicycle parking to construction workers and offer meal options onsite or shuttles to nearby meal destinations for construction employees.
- Reduce electricity use in the construction office by using light-emitting diode (LED) bulbs, powering off computers every day, and replacing heating and cooling units with more efficient ones.
- Minimize energy used during site preparation by deconstructing existing structures to the greatest extent feasible.
- Recycle or salvage nonhazardous construction and demolition debris, with a goal of recycling at least 15 percent more by weight than the diversion requirement in Title 24.
- Use locally sourced or recycled materials for construction materials (goal of at least 20 percent based on costs for building materials and based on volume for roadway, parking lot, sidewalk and curb materials). Wood products used should be certified through a sustainable forestry program.
- Develop a plan to efficiently use water for adequate dust control since substantial amounts of energy can be consumed during the pumping of water.
- Include all requirements in applicable bid documents, purchase orders, and contracts, with successful contractors demonstrating the ability to supply the compliant on- or off-road construction equipment for use prior to any ground-disturbing and construction activities.

Operation

As discussed in Section 3.6.3.2, *Methodology and Approach*, emissions from project operations were calculated using CalEEMod and data provided by the applicant. Table 3.6-5 shows the estimated net annual GHG emissions associated with operational activities in 2034 under Scenario B, which has higher total GHG emissions than Scenario A. Emissions for both scenarios can be found in Appendix 3.1-1, *Air Quality and Greenhouse Gas Technical Appendix*, and as detailed in Section 3.6.3.3. The model assumptions, inputs, and output files are also provided in Appendix 3.1-1.

Table 3.6-5. Operational Greenhouse Emissions by Sector for 2034

Emissions Source	Annual GHG Emissions [a] ($MTCO_2e$)
Existing	
Mobile Sources [b]	21,498
Area Sources	29
Energy Use	1,657
Water Use	49
Solid Waste Generation	648
Stationary Equipment	--
Refrigerants	1
Total – Existing Uses	**23,882**
Project [c]	
Mobile Sources [b]	28,564
Area Sources [d]	--
Energy Use [e]	--
Water Use	225
Solid Waste Generation	1,225
Stationary Equipment	310
Refrigerants	40
Total – Project	**30,364**
Net Emissions	**6,482**

Source: Appendix 3.1-1, *Air Quality and Greenhouse Gases Technical Appendix*.

[a] Values may not sum due to rounding.

[b] Mobile sources consist of GHGs emitted from employee, resident, and visitor vehicles traveling to and from the project site.

[c] Estimated net annual GHG emissions account for **Mitigation Measures AQ-2-A** through **AQ-2-F**, which are necessary to reduce criteria pollutant emissions to less-than-significant levels, as described in Section 3.1, *Air Quality*.

[d] **Mitigation Measure AQ-2-F** would eliminate emissions from landscaping equipment, the only area source with the potential to generate GHG emissions. Consequently, emissions from area sources would be zero.

[e] The project's electricity consumption would not be a source of GHG emissions because PCE's electricity products will be carbon free in 2034, as detailed in Section 3.6.3.2, *Methodology and Approach*. As previously described, PCE is the default electricity provider for San Mateo County, and it is assumed to supply electricity to the project site. Although recent data is unavailable, opt-out rates are expected to remain low, and any change in emissions from customers opting out would be minimal due to state legislation requiring 90 percent renewable electricity by 2035.

As shown in Table 3.6-5, the project would generate approximately 6,482 $MTCO_2e$ during its first year of full buildout operation. The primary source of emissions during project operation would be mobile-source GHG emissions from vehicles traveling to and from the project site (mobile sources). Other sources of emissions include emergency generators (stationary equipment) and landscaping equipment (area sources – existing only), electricity consumption associated with providing power to buildings (energy use – existing only) and processing water and wastewater (water use), and the generation of solid waste. Refrigerant emissions occur because the gases used in certain equipment, such as heating, ventilation, and air conditioning (HVAC) and refrigeration equipment, inadvertently leaks into the atmosphere.

Operational activities would generate the greatest annual emissions in the first year of full buildout, which is anticipated to be 2034, and thus the emissions shown in Table 3.6-5 represent the worst-case year of project operations. Emissions in subsequent years would continually decrease, as the statewide vehicle fleet transitions to new, lower-carbon emitting vehicles. As noted previously, there are existing uses on the project site that generate emissions, and those uses would be removed with implementation of the project. As such, net project emissions were calculated by subtracting existing year 2025 operational emissions from full buildout year 2034 emissions.

The emissions quantities in Table 3.6-5 are not directly used to evaluate the significance of the project's GHG emissions, but annual operational emissions were estimated and presented here to provide a fully comprehensive assessment of the project's effects on the environment. A discussion of the project's consistency with the Air District's land use thresholds used to evaluate the significance of the project's GHG impact is provided below.

Bay Area Air District Land Use Thresholds

This analysis evaluates the project's consistency with the Air District's land use Threshold Option A to determine the significance of the project's GHG emissions. Table 3.6-6 provides the project's consistency with these requirements.

Table 3.6-6. Project Consistency with Bay Area Air District Greenhouse Gas Land Use Thresholds

Threshold	Project Consistency
Sector - Buildings	
The project will not include natural gas appliances or natural gas plumbing (in either residential and nonresidential development).	**Consistent.** As noted in Chapter 2, *Project Description*, the project would be all-electric and would not include natural gas appliances or natural gas plumbing. As such, the project would be consistent with this design element.
The project will not result in any wasteful, inefficient, or unnecessary electrical usage as determined by the analysis required under CEQA Section 21100(b)(2) and Section 15126.2(b) of the CEQA Guidelines.	**Consistent.** As determined in Section 3.4, *Energy*, the project was found not to result in wasteful, inefficient, or unnecessary consumption of energy resources with the inclusion of the Air District-recommended BMPs described above and **Mitigation Measure AQ-2-A**. In addition, the project proposes efficient building systems, including heat recovery systems and reduced light power density, and would achieve a 25% reduction in annual energy use from the ASHRAE Baseline. Finally, the proposed parking garages and other large roof surfaces would be used for onsite solar energy generation. The project, thus, includes several design features that would minimize wasteful or inefficient energy use and would be consistent with this design element.

Threshold		Project Consistency
Sector - Transportation		
a.	Achieve compliance with electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.	**Consistent.** To evaluate consistency with this design element, the project is compared to the CALGreen Sections A5.106.5.3 and A4.106.8.2, EV charging requirements for new nonresidential and residential development, respectively. For nonresidential uses, CALGreen Tier 2 requires 45% of the total parking spaces to be EV Capable and 33% of EV Capable spaces to be EV charging stations. For multifamily residential uses and hotels and motels, CALGreen Tier 2 requires 40% of the total parking spaces to be EV Ready and 15% of the total spaces to be equipped with Level 2 EV supply equipment. As part of the project design, the project would include sufficient EV parking, including EV Capable, EV Ready, and EV supply equipment, to meet the CALGreen Tier 2 EV standards. As such, the project would be consistent with this design element.
b.	Achieve a reduction in project-generated VMT below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted SB 743 VMT Target, reflecting the recommendations provided in the Governor's Office of Planning and Research's Technical Advisory on Evaluating Transportation Impacts in CEQA: i. Residential projects: 15 percent below the existing VMT per capita. ii. Office projects: 15 percent below the existing VMT per employee iii. Retail projects: no net increase in existing VMT	**Consistent.** As detailed in Section 3.14, *Transportation*, the project would not exceed the parking minimums listed in the City of San Bruno's parking code. Rather, the project reduces parking requirements by proposing maximum allowable parking ratios lower than those for residential uses in the City of San Bruno's parking code, which would be codified through the project's P-D zoning. Because the project is located adjacent to the San Bruno BART station and would not exceed the parking minimums listed in the City of San Bruno's parking code, the project can be assumed to have a less-than-significant VMT impact without a detailed analysis comparing the project's per capita VMT to the regional average, in accordance with the Governor's Office of Planning and Research's Technical Advisory on Evaluating Transportation Impacts in CEQA (OPR 2018). Furthermore, by redeveloping the site to include more housing and job opportunities directly adjacent to the San Bruno BART station, the project promotes transit use and supports sustainable land use, aligning with SB 743's goals of lowering VMT, reducing GHG emissions, and fostering more efficient development patterns. As a result, the project would be consistent with this design element.

Source: BAAQMD 2023.

ASHRAE = American Society of Heating, Refrigerating, and Air-Conditioning Engineers; BART = Bay Area Rapid Transit; CALGreen = California Green Building Standards Code; CEQA = California Environmental Quality Act; EV = electric vehicle; GHG = greenhouse gas; OPR = Governor's Office of Planning and Research; SB = Senate Bill; VMT = vehicle miles traveled

As demonstrated in Table 3.6-6, the project would be consistent with all land use Threshold Option A design elements. As a result, the project would not result in a cumulatively considerable impact with respect to GHG emissions. This impact would be ***less than significant***.

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

CARB 2022 Scoping Plan

As explained in Section 3.6.2.1, *Regulatory Setting*, CARB's 2022 Scoping Plan outlines the main strategies for California to keep California on track to meet its SB 32 GHG reduction target of at least 40 percent below 1990 emissions by 2030, as well as to achieve carbon neutrality by 2045 and a reduction in anthropogenic emissions by 85 percent below 1990 levels (CARB 2022). Appendix D to CARB's 2022 Scoping Plan, *Local Actions*, (Appendix D) notes that a lead agency can analyze the GHG impact of a project by employing a threshold of significance recommended by the applicable air district, provided the threshold aligns with the state's most recent GHG reduction goals and is supported by substantial evidence.

As stated previously, the project would be consistent with all land use Threshold Option A design elements, which were developed by Bay Area Air District to ensure that projects align with the state's most recent GHG targets, including the SB 32 2030 target and the goal of carbon neutrality by 2045. The Air District provides substantial evidence for this threshold in Appendix B of its CEQA Guidelines (BAAQMD 2023). By including all land use Threshold Option A design elements, the project would contribute its fair share of what will be required to achieve the state's most recent long-term climate goals, consistent with CARB's 2022 Scoping Plan.

In addition, Appendix D identifies key project attributes that empirical evidence shows reduce operational GHG emissions while simultaneously advancing fair housing. CARB concludes that "[r]esidential and mixed-use projects that have all of the key project attributes in Table 3 [Key Residential and Mixed-Use Project Attributes that Reduce GHGs] should accommodate growth in a manner consistent with state GHG reduction and equity prioritization goals" (CARB 2022). Table 3.6-7 provides the project's consistency with these attributes.

Table 3.6-7. Project Consistency with the California Air Resources Board 2022 Scoping Plan Key Project Attributes

Project Attribute	Project Consistency
Transportation Electrification	
Provides EV charging infrastructure that, at minimum, meets the most ambitious voluntary standard in the California Green Building Standards Code at the time of project approval.	**Consistent.** As discussed under **Impact GHG-1**, the project would achieve the voluntary Tier 2 standards for EV charging infrastructure under the 2022 CALGreen code. As such, the project would be consistent with this attribute.
VMT Reduction	
Is located on infill sites that are surrounded by existing urban uses and reuses or redevelops previously undeveloped or underutilized land that is presently served by existing utilities and essential public services (e.g., transit, streets, water, sewer).	**Consistent.** The project site is currently developed with a shopping mall, including numerous shops and restaurants, as well as Target and The Century at Tanforan movie theater. The project would redevelop previously underutilized land that is presently served by existing utilities and essential public services, including an adjacent BART station. As such, the project would be consistent with this attribute.
Does not result in the loss or conversion of natural and working lands.	**Consistent.** As described previously, the project site is currently developed with a shopping mall, Target, and The Century at Tanforan movie theater. As such, the

Project Attribute	Project Consistency
	project would not result in the loss or conversion of natural and working lands and would be consistent with this attribute.
• Consists of transit-supportive densities (minimum of 20 residential dwelling units per acre); or • Is in proximity to existing transit stops (within 0.5 mile); or • Satisfies more detailed and stringent criteria specified in the region's SCS.	**Consistent.** By developing the 44-acre site with 1,014 to 1,514 new residential dwelling units, the project would consist of transit-supportive densities exceeding the minimum of 20 dwelling units per acre. The project site is also well-served by transit, with an adjacent BART station and a Caltrain station within 0.5 mile. Thus, the project would be in proximity of an existing transit stop. Finally, as discussed below, the project would be consistent *Plan Bay Area 2050*, the RTP/SCS for the San Francisco Bay Area. As such, the project would be consistent with this attribute.
Reduces parking requirements by: • Eliminating parking requirements or including maximum allowable parking ratios (i.e., the ratio of parking spaces to residential units or square feet); or • Providing residential parking supply at a ratio of less than one parking space per dwelling unit; or • For multifamily residential development, requiring parking costs to be unbundled from costs to rent or own a residential unit.	**Consistent.** As detailed in Section 3.14, *Transportation*, the project would not exceed the parking minimums listed in the City of San Bruno's parking code (Appendix 3.14-1, *Transportation Analysis Summary*). Rather, the project reduces parking requirements by proposing maximum allowable parking ratios lower than those for residential uses in the City of San Bruno's parking code, which would be enforced through the project's P-D zoning. As such, the project would be consistent with this attribute.
At least 20 percent of units included are affordable for lower-income residents.	**Inconsistent.** As described in Section 3.11, *Population and Housing*, the project would comply with the City's Affordable Housing Program, which states that all new residential development projects of five or more units shall include at least 15% of the total units as affordable housing units. By including 15% affordable housing units, the project would not meet the threshold of 20%. However, the project would be consistent with the City's Affordable Housing Program, thus, incorporating a level of affordable housing that the City has determined to be appropriate for its local conditions. Nonetheless, the project would be inconsistent with this attribute.
Results in no net loss of existing affordable units.	**Consistent.** As described previously, the project site is currently developed with a shopping mall, Target, and The Century at Tanforan movie theater and does not currently provide any affordable units. The project proposes 15% affordable residential dwelling units, thus, resulting in a net increase in affordable units. As such, the project would be consistent with this attribute.
Building Decarbonization	
Uses all-electric appliances without any natural gas connections and does not use propane or other fossil fuels for space heating, water heating, or indoor cooking.	**Consistent.** As discussed under Impact GHG-1, the project would not include natural gas appliances or natural gas plumbing. As such, the project would be consistent with this attribute.

Source: CARB 2022.

As discussed in Table 3.6-7, the project would not meet the standard of 20 percent affordable units as identified in Appendix D. However, Appendix D notes that "Lead agencies may determine, with adequate additional supporting evidence, that projects that incorporate some, but not all, of the key project attributes are consistent with the State's climate goals" (CARB 2022).

Though the project would not meet the standard of 20 percent affordable units, it would be consistent with the City's Affordable Housing Program by including 15 percent affordable housing units. The project would, thus, incorporate a level of affordable housing that is appropriate for local conditions and supports the state's fair housing efforts. Further, the project would result in a net increase in and no loss of any affordable units. Moreover, as discussed in Table 3.6-7, the project would incorporate all other scoping plan-identified key project attributes, and as a transit-oriented project immediately adjacent to a BART station, the project is consistent with CARB's 2022 Scoping Plan and aligns with the state's climate goals.

Because the project would contribute its fair share of what will be required to achieve the state's most recent long-term climate goals per Air District guidance and align with the state's climate strategies as defined in Appendix D, the project would not conflict with implementation of CARB's 2022 Scoping Plan or attainment of the statewide GHG targets for 2030 and 2045 mandated by SB 32 and AB 1279, respectively.

California Senate Bill 375/Plan Bay Area 2050

Plan Bay Area 2050, the RTP/SCS for the San Francisco Bay Area, was prepared by MTC pursuant to the requirements of SB 375, as discussed in the Section 3.6.2.1, *Regulatory Setting*. *Plan Bay Area 2050* is a state-mandated, integrated long-range transportation and land use plan that demonstrates reductions in GHG emissions from passenger cars and light-duty trucks (CARB 2024e).

Plan Bay Area 2050 highlights the importance of achieving a more balanced distribution of jobs and housing across the region. In San Mateo County, where the project site is located, there are more jobs than housing, intensified growth in the county would make it possible for more people to live near their workplaces (MTC/ABAG 2021a). The project would advance the *Plan Bay Area 2050* objectives by siting new residential dwelling units in San Mateo County, promoting a more balanced distribution of jobs and housing across the region. Moreover, the project site is adjacent to an existing BART station and within 0.5 mile of a Caltrain station. The project would, thus, be in proximity (i.e., within 0.5 mile) of an existing transit stop, consistent with *Plan Bay Area 2050* efforts to encourage the use of transit as an alternative method of transportation. Additionally, the project would encourage more sustainable modes of accessing BART by establishing a new mixed-use, transit-oriented development near the station and placing more riders within walking distance, in line with the BART Station Access Policy goals A3 and D2 (BART 2016). As described in more detail in Chapter 3.14, *Transportation*, the project would not conflict with any program, plan, ordinance, or policy addressing transit, roadway, bicycle, and pedestrian facilities, including the currently adopted transportation goals and policies in the City's General Plan.

The project would also support several *Plan Bay Area 2050* strategies, as described below.

H3. Allow a greater mix of housing densities and types in Growth Geographies.

The project would redevelop the site with a mixed-use transit village, including new residential dwelling units, within a Priority Development Area, a type of *Plan Bay Area 2050* Growth Geography as defined by MTC/ABAG (MTC/ABAG 2021b). Thus, the project would support *Plan Bay Area 2050* strategy H3 in developing a greater mix of housing densities and types in Growth Geographies.

H6: Transform aging malls and office parks into neighborhoods.

The project would redevelop the existing mall with a mixed-use transit village offering places to live, work, shop, and enjoy recreation. Thus, the project would support *Plan Bay Area 2050* strategy H6 by transforming an aging mall into a mixed-use neighborhood.

EC4. Allow greater commercial densities in Growth Geographies.

The project would be within a Priority Development Area, a type of *Plan Bay Area 2050* Growth Geography as defined by MTC/ABAG (MTC/ABAG 2021b). Thus, the project would support Plan Bay Area 2050 strategy EC4 by developing a mix of commercial uses within one of the Plan Bay Area 2050 Growth Geographies.

EN4. Maintain urban growth boundaries.

The project site falls within the Rural Urban Boundary, as defined by MTC/ABAG (MTC/ABAG 2020). Thus, the project would support *Plan Bay Area 2050* strategy EN4 by maintaining urban growth boundaries.

EN6. Modernize and expand parks, trails and recreation facilities.

The project would include open spaces in the form of courtyards, plazas, and avenues. These open spaces that will form a new neighborhood center, with improved walkability and inclusive recreational opportunities. Thus, the project would support *Plan Bay Area 2050* strategy EN6 by modernizing recreation facilities.

Conclusion

As described above, the project would not conflict with implementation of CARB's 2022 Scoping Plan or MTC/ABAG's *Plan Bay Area 2050*. As a result, the project's impact with respect to applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions would be ***less than significant***.

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3.6.5 Personal Communications

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3.7 Hazards and Hazardous Materials

3.7.1 Introduction

This section evaluates the potential impacts on hazards and hazardous materials that could result from construction and operation of the Tanforan Redevelopment Project (project) including impacts from the routine transport, use, or disposal of hazardous materials; upset or accident conditions involving the release of hazardous materials into the environment; and hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school. This section also describes existing conditions at the project site as well as the regulatory framework for this analysis. Impacts resulting from implementation of the project are also evaluated, and feasible mitigation measures, where applicable, are described.

Relevant technical documentation used in this analysis includes the following technical studies prepared for the project.

- *Phase I Environmental Site Assessments* (Appendix 3.7-1)
    - *1122 El Camino Real – San Bruno, California* prepared by Ramboll US Consulting, July 2021
    - *Phase I Environmental Site Assessment 1150 and 1178 El Camino Real – San Bruno, California* prepared by Ramboll US Consulting, October 2021
    - *Phase I Environmental Site Assessment The Shops at Tanforan 1122-1198 El Camino Real and 300 Tanforan Park – San Bruno, California* prepared by Ramboll US Consulting, February 2025

Issues identified in response to the Notice of Preparation (NOP) (Appendix 1-1, *Notice of Preparation and Comments Received on the Notice of Preparation*) were considered in preparing this analysis. The NOP comments pertaining to hazards and hazardous materials include recommendations by the Department of Toxic Substances Control (DTSC) to work with the County of San Mateo to evaluate potential hazards related to historic on-site uses, conduct surveys for hazardous building materials, and conduct testing of any imported soil or fill material. Comments were also received from the San Francisco International Airport (SFO), Caltrans, and the City/County Association of Governments of San Mateo County (C/CAG) requesting an evaluation of consistency with relevant safety policies in the applicable airport land use plan. Comments were also received from the SFO, the Federal Aviation Administration (FAA), and others regarding the potential for building heights to affect navigable airspace. These issues are addressed in Section 3.7.3.4, *Impacts and Mitigation Measures*, under Impact HAZ-2 (evaluates potential hazardous materials impacts related to historic on-site uses, discusses surveys for potential hazardous building materials, and discusses testing of imported soils or fill) and Impact HAZ-5 (discusses consistency with airport safety requirements, including height restrictions).

A *hazardous material* is any substance that, because of its quantity, concentration, or physical or chemical properties, may pose a hazard to human health or the environment. Under California Code of Regulations (CCR) Title 22, the term *hazardous substance* refers to both hazardous materials and hazardous wastes. Both of these are classified according to four properties: (1) toxicity, (2) ignitability, (3) corrosivity, and (4) reactivity (CCR Title 22, Chapter 11, and Article 3). A hazardous material is defined in CCR Title 22 as:

> [a] substance or combination of substances which, because of its quantity, concentration, or physical, chemical or infectious characteristics, may either (1) cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness; or (2) pose a substantial present or potential hazard to human health or environment when improperly treated, stored, transported or disposed of or otherwise managed (CCR Title 22 Section 66260.10).

Hazardous materials in various forms can result in death, serious injury, long-lasting health effects, or damage to buildings, homes, and other property. Hazards to human health and the environment can occur during the production, storage, transportation, use, or disposal of hazardous materials.

3.7.2 Existing Conditions

3.7.2.1 Regulatory Setting

This section summarizes regulations and policies that are relevant to the analysis of the project's potential impacts on hazards and hazardous materials.

Federal

Hazardous Waste Handling

The federal Toxic Substances Control Act and the Resource Conservation and Recovery Act (RCRA) established a program to be administered by the U.S. Environmental Protection Agency (EPA) to regulate the generation, transport, treatment, storage, and disposal of hazardous waste. The RCRA was amended in 1984 by the Hazardous and Solid Waste Act, which specifically prohibits the use of certain techniques for the disposal of hazardous waste.

Comprehensive Environmental Response, Compensation, and Liability Act

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as Superfund, was enacted by Congress on December 11, 1980, and amended by the Superfund Amendments and Reauthorization Act on October 17, 1986. This law (42 United States Code [USC] 103) provides broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA establishes requirements concerning closed and abandoned hazardous waste sites, provides for liability of persons responsible for releases of hazardous waste at these sites, and establishes a trust fund to provide for cleanup when no responsible party can be identified. CERCLA also enabled revision of the National Contingency Plan. The National Contingency Plan (40 CFR 300) provides the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, and contaminants. The National Contingency Plan also established the National Priorities List, which is the list of Superfund sites.

Occupational Safety and Health Administration

The Occupational Safety and Health Act of 1970, administered by the Occupational Safety and Health Administration (OSHA), is intended to ensure the safety and health of American workers by setting and enforcing standards; providing training, outreach, and education; establishing partnerships; and encouraging continual improvement in workplace safety and health. OSHA establishes and enforces protective standards and reaches out to employers and employees through technical assistance and consultation programs. OSHA standards are listed in Title 29 of the CFR.

Toxic Substances Control Act

The Toxic Substances Control Act of 1976 authorized EPA to secure information on all new and existing chemical substances and control those substances with unreasonable risks related to public health and the environment.

U.S. Department of Transportation Hazardous Materials Regulations (49 CFR 100–185)

U.S. Department of Transportation regulations cover all aspects of hazardous materials packaging, handling, and transport. Some of the topics covered include Parts 107 (Hazard Materials Program), 130 (Oil Spill Prevention and Response), 172 (Emergency Response), 173 (Packaging Requirements), 174 (Rail Transportation), 176 (Vessel Transportation), 177 (Highway Transportation), 178 (Packaging Specifications), and 180 (Packaging Maintenance).

State

California Environmental Protection Agency

The California Environmental Protection Agency (CalEPA) was created in 1991. It unified California's environmental authority in a single cabinet-level agency and brought the California Air Resources Board, State Water Board, RWQCBs, California Department of Resources Recycling and Recovery (CalRecycle), DTSC, Office of Environmental Health Hazard Assessment, and Department of Pesticide Regulation under one agency. These agencies were placed under the CalEPA "umbrella" for the protection of human health and the environment to ensure the coordinated deployment of state resources. Their mission is to restore, protect, and enhance the environment and ensure public health, environmental quality, and economic vitality.

Department of Toxic Substances Control

DTSC, a department of CalEPA, is the primary agency in California for regulating hazardous waste, cleaning up existing contamination, and finding ways to reduce the amount of hazardous waste produced in California. DTSC regulates hazardous waste primarily under the authority of the federal RCRA and the California Health and Safety Code (primarily Division 20, Chapters 6.5 through 10.6, and Title 22, Division 4.5). Other laws that affect hazardous waste are specific to handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning.

Cortese List

CalEPA maintains the Hazardous Wastes and Substances Site List (Cortese List), which is a planning document used by state and local agencies as well as developers to comply with California Environmental Quality Act (CEQA) requirements for providing information about the locations of hazardous material releases. Per Government Code Section 65962.5, the Cortese List must be updated at least once annually. DTSC, the State Water Board, and CalRecycle contribute to the hazardous material release site listings.

Hazardous Waste Control Act (Section 25100 et seq.)

DTSC is responsible for enforcing the Hazardous Waste Control Act (California Health and Safety Code Section 25100 et seq.), a framework under which hazardous wastes are managed in California. The law provides for the development of a state hazardous waste program that administers and implements the provisions of the federal RCRA with regard to the waste management system in

California. It also provides for the designation of California-only hazardous waste and development of standards that are equal to or, in some cases, more stringent than federal requirements.

Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

In January 1996, CalEPA adopted regulations for implementing the Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program) (California Health and Safety Code, Chapter 6.11, Sections 25404–25404.9). The Unified Program is implemented at the local level. The Certified Unified Program Agency (CUPA) is the local agency responsible for implementation of the Unified Program. San Mateo County Environmental Health Services is the designated CUPA for the Project Site.

The Unified Program consolidates, coordinates, and makes consistent the administrative requirements, permits, inspections, and enforcement activities of hazardous materials programs, including the HazMat Business Plan Program, California Accidental Release Prevention Program, Underground Storage Tank Program, Aboveground Storage Tank Program, and Hazardous Waste Generator Program; it also addresses incident response.

California Code of Regulations, Title 8—Industrial Relations

Occupational safety standards exist in federal and state laws to minimize safety risks for workers from both physical and chemical hazards in the workplace. The California Division of Occupational Safety and Health (known as Cal/OSHA) and the federal OSHA are the agencies responsible for ensuring worker safety in the workplace. Cal/OSHA assumes primary responsibility for developing and enforcing standards for safe workplaces and work practices. These standards apply to construction activities.

California Labor Code (Division 5, Parts 1, 6, 7, and 7.5)

The California Labor Code is a collection of regulations for the workplace that ensure appropriate training on the use and handling of hazardous materials, as well as the operation of equipment and machines that use, store, transport, or dispose of hazardous materials. Division 5, Part 1, Chapter 2.5 ensures that employees who are in charge of handling hazardous materials are appropriately trained and informed with respect to the materials they handle. Division 5, Part 7 ensures that employees who work with volatile flammable liquids are outfitted with appropriate safety gear and clothing.

CUPA Hazardous Materials Release Response Plans and Inventory Program Business Plans

State and federal community right-to-know laws were passed in 1986. These laws allow public access to information about the types and amounts of chemicals being used at local businesses. The laws also require businesses to plan and prepare for a chemical emergency through preparation of Hazardous Materials Release Response Plans and Inventory Program Business Plans, which are certified annually. Hazardous Materials Release Response Plans and Inventory Program Business Plans are required of any facility that handles hazardous materials or hazardous waste in amounts greater than 55 gallons for liquids, 500 pounds for solids, and 200 cubic feet for compressed gases.

Under this program, businesses are inspected at least once every 3 years by a CUPA inspector to verify compliance with the California Health and Safety Code and CCR. Hazardous materials business plans must include the following.

- A floor plan of the facility in question and details regarding the business conducted at the site.
- An inventory of hazardous materials handled or stored onsite.
- An emergency response plan.
- A training program for new employees regarding safety and emergency response, along with annual refresher courses.

Regional and Local

San Mateo County Health Department, Environmental Health Division

As discussed above, the San Mateo County Health Department, Environmental Health Division is the primary local agency approved as the CUPA with responsibility for implementing federal and state laws and regulations pertaining to hazardous materials management. The Unified Program is described under Section 4.8.3.2, above. As the local CUPA, the San Mateo County Health Department, Environmental Health Division maintains the records regarding location and status of hazardous materials sites in the county, and administers programs that regulate and enforce the transport, use, storage, manufacturing and remediation of hazardous materials.

County of San Mateo Emergency Operations Plan

The 2015 County of San Mateo Emergency Operations Plan (County of San Mateo 2015) establishes policies and procedures and assigns responsibilities to ensure effective management of emergency response operations within the San Mateo County Operational Area. The emergency management organization in San Mateo County identifies potential threats to life, property, and the environment. It also develops plans and procedures to protect assets from potential hazards and prevent or mitigate threats (e.g., hazardous materials spills).

Comprehensive Airport Land Use Compatibility Plan

State law requires Airport Land Use Commissions (ALUCs) to prepare and adopt an Airport Land Use Compatibility Plan (ALUCP) for each public use and military airport within their jurisdiction. Further, ALUCs are required to review the plans, regulations, and other actions of local agencies and airport operators within each commission's jurisdiction. The SFO runway is approximately 0.7 mile (3,500 feet) east of the project site. The 2012 Comprehensive ALUCP prepared for SFO has four primary areas of concern.

- **Aircraft Noise Impact Reduction.** To reduce the potential number of future airport area residents who could be exposed to noise impacts from airport and aircraft operations.
- **Safety of Persons on the Ground and in Aircraft in Flight.** To minimize the potential number of future residents and land use occupants exposed to hazards related to aircraft operations and accidents.
- **Height Restrictions/Airspace Protection.** To protect the navigable airspace around SFO for the safe and efficient operation of aircraft in flight.
- **Overflight Notification.** To establish an area within which aircraft flights to and from SFO occur frequently enough and at a low enough altitude to be noticeable by sensitive residents. Within this area, real estate disclosure notices shall be required, pursuant to state law.

The 2012 SFO ALUCP contains airport/land use compatibility policies and criteria that apply to all land uses except those considered as existing land uses. ALUCs were given authority to (1) specify how land near airports is to be used, based on safety and noise compatibility considerations; (2) develop height restrictions for new development to protect airspace in the vicinity of the airport; and (3) establish construction standards for new buildings near airports, including sound insulation requirements. As identified in the 2012 SFO ALUCP, the project site is located within the Federal Aviation Regulation Part 77 sphere of influence, which is the boundary established to regulate obstructions to airspace navigation, including building heights, and within SFO's Airport Influence Areas A and B, requiring ALUC review for consistency with ALUCP policies.

ALUCP Policy SP-1 identifies Safety Compatibility Zones within certain distances from an airport to minimize potential hazards and improve public safety. Policy SP-2 defines incompatible land uses within each Safety Compatibility Zone. There are five Safety Compatibility Zones in the vicinity of SFO; these range from Zone 1, which is a broad area surrounding airport facilities, to Zone 5, which is the area immediately surrounding airport runways. As shown in Figure 3.7-1, *ALUCP Safety Compatibility Zones*, the majority of the project site is within Safety Zone 4, the Outer Approach/Departure Zone. Incompatible uses within Safety Zone 4 include large child day care centers,[1] Biosafety level (BSL) 3 and 4 facilities,[2] and children's schools. Incompatible uses are not compatible in the Safety Zone and should not be permitted. Uses to be avoided, including hazardous uses[3] other than BSL 3 and 4 facilities and critical public utilities,[4] should not be allowed in the Safety Zone unless no feasible alternative is available, as determined by the City. Where these uses are allowed, habitable structures should be provided with at least 50 percent more exits than required by applicable codes.

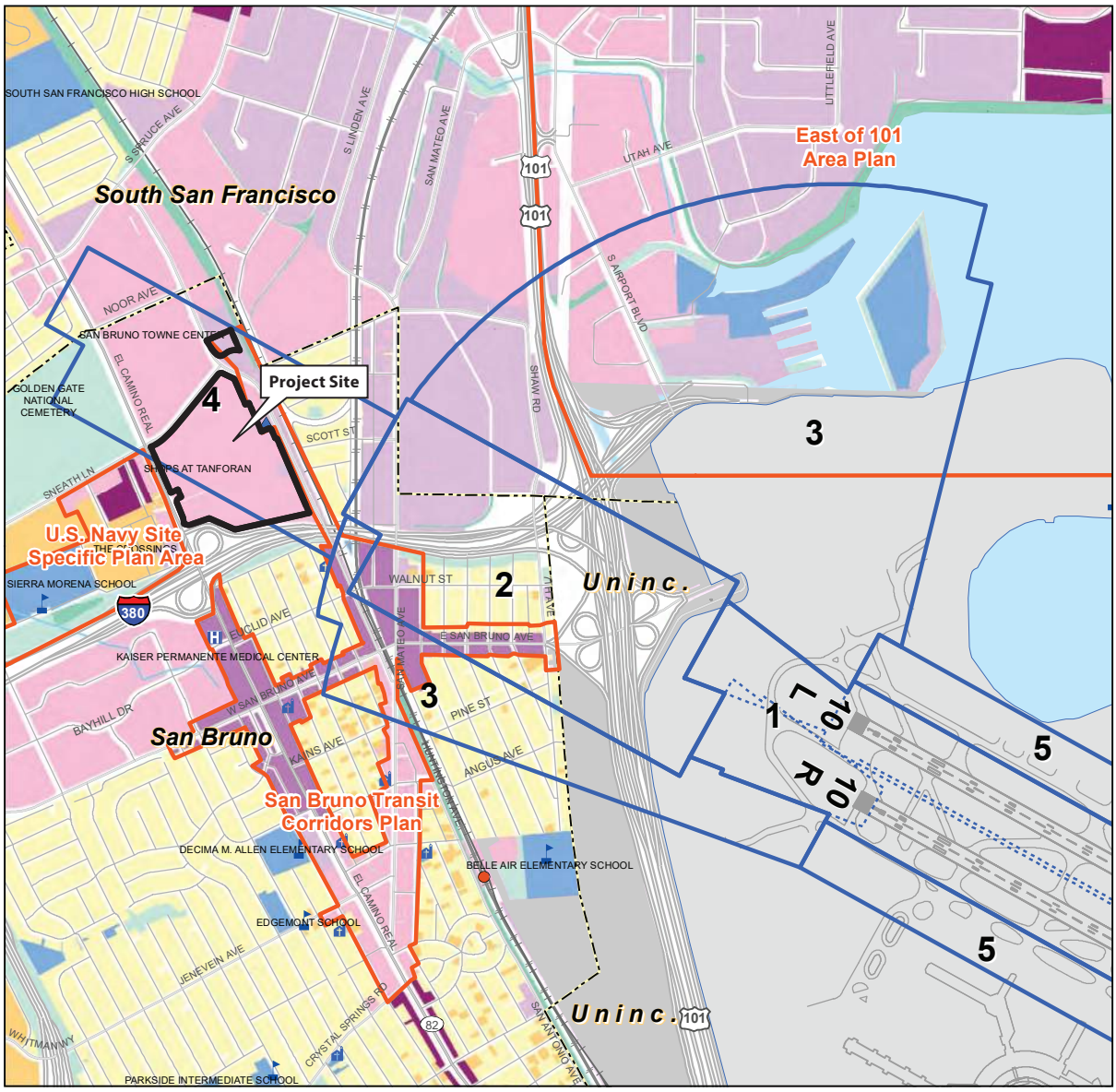
The ALUCP also establishes airport vicinity height limitations to protect public safety, health, and welfare by ensuring that aircraft can safely fly in the airspace around an airport and to protect the operational capability of airports. The criteria used in establishing these policies are based on the Title 14 of the CFR, Part 77, Safe, Efficient Use and Preservation of the Navigable Airspace, which governs the FAA's review of proposed construction exceeding certain height limits, defines airspace obstruction criteria, and provides for FAA aeronautical studies of proposed construction. The ALUCP incorporates the provisions in Title 14 CFR Part 77; Appendix F of the ALUCP describes the FAA airspace review process and the extent of FAA authority related to airspace protection. As noted in the ALUCP, the height of new development must be maintained below defined obstacle clearance surfaces, referred to as critical aeronautical surfaces.

[1] Large child day care centers are commercial facilities defined in accordance with Health and Safety Code, Section 1596.70, et seq., and licensed to serve 15 or more children. Family day care homes and noncommercial employer-sponsored facilities ancillary to place of business are allowed (C/CAG 2012).

[2] Biosafety Level 3 and 4 facilities are medical and biological research facilities involving the storage and processing of extremely toxic or infectious agents (C/CAG 2012).

[3] Hazardous uses are uses involving the manufacture, storage, or processing of flammable, explosive, or toxic materials that would substantially aggravate the consequences of an aircraft accident (C/CAG 2012).

[4] Critical public utilities are facilities that, if disabled by an aircraft accident, could lead to public safety or health emergencies. They include the following: electrical power generation plants, electrical substations, wastewater treatment plants, and public water treatment facilities (C/CAG 2012).



LEGEND

Safety Compatibility Zones

- 1 - Runway Protection Zone-Object Free Area
- 2 - Inner Approach/Departure Zone
- 3 - Inner Turning Zone
- 4 - Outer Approach/Departure Zone
- 5 - Sideline Zones
- Internal boundaries of ALP-defined areas
- Specific Plan Area
- Airport Property
- BART Station
- CALTRAIN Station
- School
- Place of Worship
- Hospital
- Municipal Boundary
- Railroad
- Freeway
- Major Road
- Road

Planned Land Use Per General Plans

- Public
- Multi-Family Residential
- Single Family Residential
- Mixed Use
- Transit Oriented Development
- Commercial
- Industrial, Transportation, and Utilities
- Local Park, Golf Course, Cemetery
- Regional Park or Recreation Area
- Open Space

NORTH

0 0.125 0.25 0.5 Miles

Sources:

Local Plans:
- San Bruno General Plan, December 2008
- South San Francisco General Plan, 1998

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Figure 3.7-1
ALUCP Safety Compatibility Zones

As identified in the ALUCP, the project site is located within the Federal Aviation Regulation Part 77 sphere of influence, which is the boundary established to regulate obstructions to airspace navigation, including building heights. Based on these requirements, the ALUCP establishes height restrictions within specific contours of airport facilities throughout Area A and Area B in which the project site is located; specifically, as shown in Figure IV-17 in the ALUCP, the project site falls within a range of 125 to 145 feet above mean sea level (AMSL) as defined by the North American Vertical Datum of 1998 (NAVD88[5]) on the airport's critical aeronautical surfaces.

Since ground elevation at the project site ranges from 36 to 66 feet AMSL NAVD88 and assuming ground elevation would not change, the heights of the proposed buildings could be no higher than approximately 55 and 90 feet above ground level, depending on horizontal location, to be compatible with the Airspace Protection Policies of the SFO ALUCP. Such compatibility would also be contingent on the issuance of a Determination of No Hazard from the FAA for any proposed structures and determinations from C/CAG as the designated ALUC. Pertinent ALUCP policies are summarized below.

ALUCP Policy AP-3 requires that the maximum height of a new building be the lower of (1) the height shown on the SFO critical aeronautical surfaces map in the SFO ALUCP, or (2) the maximum height determined not to be a "hazard to air navigation" by the FAA (via an aeronautical study and pursuant to the filing of Form 7460-1). Compliance with applicable zoning district height and the SFO critical aeronautical surfaces map, however, does not relieve the construction sponsor of the obligation to file a FAA Form 7460-1 *Notice of Proposed Construction or Alteration*, if required, and to comply with the determinations resulting from the FAA's aeronautical study. Local agency development permits would not be issued for any proposed structure that would penetrate the aeronautical surfaces (as noted in the SFO ALUCP) or construction that has not received a Determination of No Hazard from the FAA, or construction, which would cause the FAA to increase the minimum visibility requirements for any instrument approach or departure procedure at SFO.

ALUCP Policy AP-4 Establishes incompatibility within Area B of the Airport Influence Area with land uses that may cause visual, electronic, or wildlife hazards (particularly bird strike hazards), to aircraft taking off or landing at the airport or in flight. Land use is permitted only if they are consistent with FAA rules and regulations. Proof of consistency with FAA rules and regulations and with performance standards (cited on page IV-59 of the SFO ALUCP) must be provided to the Airport Land Use Commission (C/CAG Board) by the sponsor of the proposed land use action.

As previously discussed, the ALUCP also establishes noise compatibility criteria. Refer to Section 3.10, *Noise*, for further discussion of this topic.

San Bruno General Plan

The *San Bruno General Plan*, adopted in 2009, includes goals and policies associated with hazards and hazardous materials in the Health and Safety Element (City of San Bruno 2009). These goals and policies include requiring appropriate use, disposal, and transport of hazardous materials; ensuring that all development heeds safety precautions from SFO; and regulating development on sites with known or suspected contamination of soil or groundwater.

[5] The North American Vertical Datum of 1988 (NAVD 88) is the vertical control datum established in 1991 by the minimum-constraint adjustment of the Canadian-Mexican-United States leveling observations. It consists of a leveling network on the North American Continent, ranging from Alaska, through Canada, across the United States, affixed to a single origin point on the continent.

Specifically, the *San Bruno General Plan* includes the following goals and policies associated with hazards and hazardous materials that are relevant to the project.

- **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.

3.7.2.2 Environmental Setting

Regional Setting

The City of San Bruno is in San Mateo County on the eastern side of the San Francisco Peninsula. It is approximately 12 miles south of San Francisco, immediately north of the City of Millbrae and west of SFO. The City is developed mostly with residential uses but also incorporates a variety of urban and commercial uses. Hazardous materials sites in the City include State Water Resources Control Board (State Water Board) Leaking Underground Storage Tank (LUST) Cleanup Sites, Cleanup Program Sites and DTSC Cleanup Sites, among others.

Project Site

The project site comprises the Tanforan Mall along with a vacant parcel to the north, and is currently developed with various retail uses and surface parking. Existing commercial uses are located north of the project site; single-family residential uses and commercial uses (within the City of South San Francisco) are located to the east; Interstate 380 (I-380) is to the south, with single-family residential uses on the south side and beyond I-380; and commercial uses, multifamily residential uses, and the Golden Gate National Cemetery are to the west. Surface topography across the project site is generally flat, with a slight downward slope to the east/northeast.

Prior Environmental Investigations

Phase I Environmental Site Assessment 1150 and 1178 El Camino Real, San Bruno, California.

A Phase I Environmental Site Assessment (Phase I ESA) was conducted by Ramboll US Consulting, Inc. in October of 2021 with the objective of identifying Recognized Environmental Conditions (RECs)[6] onsite.

According to the Phase I ESA, 1150 and 1178 El Camino Real were developed as part of the Tanforan Racetrack in 1899, which was temporarily converted into a military training center from 1914 to 1918 and then again, from 1941 to 1950 (including an internment camp in 1942). A fire destroyed the racetrack structures in 1964. A Sears department store building was constructed in 1969 onsite and its associated automotive center was constructed in 1972. They remained in operation until vacating the site in 2020. Several environmental investigations have occurred onsite over the years following the removal of multiple underground storage tanks (USTs) between 1985 and 1987.

[6] ASTM defines a REC as the presence or likely presence of hazardous substances or petroleum products on a property: 1. due to a release to the environment; 2. under conditions that indicate a past release; or 3. under conditions that pose a material threat of a future release.

The Phase I ESA identified one REC in connection with the sites at 1150 and 1178 El Camino Real. It was associated with the presence of petroleum hydrocarbons and benzene above regulatory screening criteria in onsite groundwater (associated with historical UST releases onsite).

Other notable findings (not considered RECs but denote areas of contingent risk not defined by the American Society for Testing and Materials [ASTM] standard) were identified as *Past operations onsite*. Former site uses may have included the use of hazardous materials and historical operations conducted onsite predate the enactment of robust environmental regulations related to the use of hazardous materials.

Non-scope considerations were also identified and included the potential availability of asbestos-containing materials (ACMs) and lead-based paint.

Phase I Environmental Site Assessment 1122 El Camino Real, San Bruno, California.

The Phase I ESA was conducted by Ramboll US Consulting, Inc. in July of 2021.

Similar to the properties at 1150 and 1178 El Camino Real (described above), the 1122 El Camino Real site was part of the southern portion of the Tanforan Racetrack and has a similar history. A JC Penney department store has operated onsite since 1972. The existing parking structures onsite were built in the 2000s. An automotive shop operations building (associated with 1110 and 1112 El Camino Real) was formerly located on the southeast corner of the site and was demolished in 2005.

The Phase I ESA did not identify any RECs associated with the 1122 El Camino Real site.

Other findings (not considered RECs but denote areas of contingent risk not defined by the ASTM standard) were identified as *Former USTs without closure documentation*. Five USTs were formerly located onsite (associated with the former automotive shop). Facility personnel had no knowledge regarding historical USTs closure activities prior to or during the demolition of the onsite building in 2005. As such, no closure documentation was available and was not obtained via any other sources consulted during the preparation of the Phase I ESA. As no release, suspected release, or potential material threat of a release was identified associated with the former USTs, this was not identified as a REC. A second finding was noted as *Past operations onsite*. Former site uses may have included the use of hazardous materials and historical operations conducted onsite predate the enactment of robust environmental regulations related to the use of hazardous materials. In addition, no subsurface characterization are known to have been conducted onsite (related to the aforementioned former USTs).

Non-scope considerations also included the potential availability of ACMs and lead-based paint.

Phase I Environmental Site Assessment The Shops at Tanforan 1122-1198 El Camino Real and 300 Tanforan Park, San Bruno, California

The Phase I ESA was conducted by Ramboll Americas Engineering Solutions, Inc. in February of 2025.

The study area analyzed in this Phase I ESA consisted of the footprints analyzed in the prior two Phase I ESAs listed above (as a result, there is some overlap in the analysis), in addition to the parcels denoted in Figure 2 of the Phase I ESA as the *Central Shops*, and the vacant site at 300 Tanforan Park. The complete footprint evaluated consisted of six parcels totaling approximately 43.8 acres.

Similar to what was described previously for 1150 and 1178 El Camino Real and 1122 El Camino Real, the site was developed as a portion of the larger Tanforan Racetrack (1899), which was temporarily converted into a military training center from 1914 to 1918 and then again, from 1941 to 1950. As previously mentioned, a fire destroyed the racetrack structures in 1964. Subsequent construction of the Tanforan Mall was completed from 1969 to 1972 and was later renovated from 2004 to 2006. The last expansion of the site included a parking garage and cinemas from 2007 to 2008.

The Phase I ESA identified one REC in connection with the site (specifically with the 1178 El Camino Real address and the San Bruno Police Station location[7]). It was associated with onsite groundwater and soil contamination as a result of historical uses. Impacts associated with the 1178 El Camino Real address included petroleum hydrocarbons in soils and groundwater due to historical onsite USTs. Several investigations have been conducted onsite and have included soil, groundwater and soil vapor sampling. In a letter dated March 15, 2013, the San Mateo County Health Department (SMCDEH) stated that active remediation was no longer required to address the UST impacts and has not requested additional investigations onsite since.

Impacts associated with the San Bruno Police Station included petroleum hydrocarbons and benzene related to a 100-gallon UST. Several investigations along with monitoring and remediation activities have occurred onsite, and results of a final groundwater sampling event indicated that benzene and ethylbenzene were detected above commercial and industrial screening levels and petroleum hydrocarbons (as gasoline) exceeded the maximum contaminant levels for drinking water. However, in 2023, the SMCDEH indicated that the site met the State Water Board's Low-Threat Underground Storage Tank Case Closure Policy (LTCP). The SMCDEH stated that an unknown amount of hydrocarbon-impacted soil and groundwater remained in the subsurface and required that the SMCDEH be notified if excavation or development occurs onsite. The current site status is listed as *eligible for case closure* pending closure of onsite groundwater wells used during groundwater monitoring.

Other findings (not considered RECs or Controlled RECs) were identified in the Phase I ESA as: *Former USTs without closure documentation*. A total of four USTs (associated with the former JC Penney/Firestone automotive building) were formerly located on the southeast portion of the site. Facility personnel could not provide evidence of the removal of any of the onsite USTs prior to or during the demolition of the onsite building in 2005. As no release, suspected release, or potential material threat of a release was identified associated with the former USTs, this was not identified as a REC. A second finding was noted as *Past operations onsite*. Former site uses may have included the use of various hazardous materials and historical operations conducted onsite predate the enactment of robust environmental regulations related to the handling, storage and disposal of hazardous materials. A third finding was noted as *Limited pavement and floor staining*. Petroleum releases or stains were observed in various interior pavement areas. However, the releases and stains were identified as limited in extent, underlying pavement and flooring appeared to be intact, and releases have been cleaned up, are in the process of being cleaned up and are contained to the interior of buildings. The Phase I ESA classified these findings as *de minimis*.

[7] The San Bruno Police Station site was not within the Phase I ESA's study area footprint (nor is it part of the project site, as both the ESA's study area and the project site footprints are the same). However, it was noted as a REC due to its immediate proximity to the Phase I ESA's study area footprint and the environmental conditions associated with it.

Additional screening level reviews (not part of the ASTM standard scope) were conducted during the preparation of the Phase I ESA and included asbestos-containing materials (ACMs), lead-based-paint, water intrusion and mold, and radon. Upon reviewing available information, the Phase I ESA concluded that various materials (were assumed to) contain asbestos, including drywall and joint compound, roofing systems, and carpet/flooring adhesives; ceramic floor tiles in the *Central Shops* and JC Penney; floor tiles in Target; and ceiling tiles in Target and JC Penney. A 2022 Asbestos Operation and Maintenance Program was prepared to safely manage these materials. Also, the Phase I ESA noted that based on the construction date of onsite structures, it is likely that lead-based paint has been used onsite. Onsite sampling for polychlorobiphenyls (PCBs) was not conducted during preparation of the Phase I ESA, however, the Phase I ESA noted that during the site reconnaissance, onsite equipment (including electrical transformers and hydraulic elevators) was observed without labeling for PCBs and also noted the possibility that equipment could have been installed prior to 1979 (year the federal ban on the manufacture of PCBs was implemented). A mold survey was not performed onsite and no information confirming the existence (or lack thereof) of mold was obtained during the preparation of the Phase I ESA. Lastly, the site is located in an area categorized as Zone 2, which has an average indoor basement radon level between 2 and 4 picoCuries per liter (pCi/L). Moreover, a radon survey conducted in the same zip code as the site resulted in a concentration of 0.100 pCi/L. Radon was not considered an exposure concern.

Hazardous Materials Database Results

An environmental database search was conducted via Environmental Data Resources (EDR). Table 3.7-1 contains one onsite and several off-site listings (within a 0.25-mile radius of the project site) with a history of releases. Sites within a 0.25-mile radius were analyzed and listed in Table 3.7-1 because they are the most likely to have an effect on the project site. All off-site properties identified as having received closure by their respective oversight agencies are considered unlikely to affect the project.

Table 3.7-1. Hazardous Materials Database Results

Site	Address	Databases	Site Status Summary and Location
Sears Automotive Center, Sears #1478	1178 El Camino Real	LUST, HIST UST, San Mateo Co. BI, Cortese, CERS, EMI, HIST CORTESE	Located within the project site. The site is listed as a LUST site with an *Open - Eligible for Closure* status. The site was listed with groundwater impacted by gasoline and with remediation activities occurring onsite since 2006. The site is undergoing closure under the SWRCB's LTCP. According to a San Mateo County Case Closure Summary form (County of San Mateo 2023) identified on GeoTracker in January 2025, an unknown amount of hydrocarbon-affected soil and groundwater remain onsite. If excavation or redevelopment is to occur onsite, the San Mateo County Environmental Health Division would require notification.
Shell Station	1199 El Camino Real	LUST, HIST UST, San Mateo Co. BI, Cortese, CERS	Located 197 feet west (and upgradient) of the project site. The site is listed as a LUST site with a *Completed - Case Closed* status. The site was listed with benzene, MTBE/TBA/other fuel oxygenates, and gasoline impacted groundwater. The case was opened in September 2002 and was closed in May 2017.

Site	Address	Databases	Site Status Summary and Location
Camp Tanforan	Not disclosed	ENVIROSTOR	Located 0.08 mile to the north, northwest (and upgradient) of the project site. The site is listed as a Military Evaluation site with a *No Further Action* status as of September 2012. No contaminants and affected media disclosed. Historically, the site was briefly used as an airfield and during World War I, the site was used as a military training center. In 1942, it was used as a temporary assembly center for persons of Japanese ancestry. The assembly center closed in October of the same year. The property then became property of the U.S. Navy in 1944. Following its military use, the site reopened as a racetrack until the early 1960s, and it was destroyed by a fire in 1964.
Malaspina Property, All West Containers Corp	30 Tanforan Avenue	CPS-SLIC, CERS, LUST, San Mateo Co. BI, Cortese, CERS	Located 0.09 mile north, northeast (and downgradient) of the project site. The site is listed as a LUST site with a *Completed - Case Closed* status. The site was listed with dichloroethane, nickel, benzene, gasoline, MTBE/TBA impacted soil and groundwater. The case was opened in January 2014 and was closed in December 2017.
Barbara Butler Artist-Builder Inc	325 S Maple Avenue #37	CPS-SLIC, CERS PFAS, HWTS, ENVIROSTOR	Located 0.10 mile north (and downgradient) of the project site. The site is listed as a Spills, Leaks, Investigations, and Cleanups site with a *Completed - Case Closed* status as of January 2023. No contaminants or affected media disclosed.
Hoffman Brothers	306 S Maple Avenue	LUST, San Mateo Co. BI, Cortese, HIST CORTESE, CERS	Located 0.13 mile north (and downgradient) of the project site. The site is listed as a LUST site with a *Completed - Case Closed* status. The site was listed with gasoline-affected groundwater. The case was opened in June 1990 and was closed in April 2000.
Vince's Shellfish	1063 Montgomery Avenue	LUST, San Mateo Co. BI, HIST CORTESE	Located 0.14 mile east (and downgradient) of the project site. The site is listed as a LUST site with a *Completed - Case Closed* status. The site was listed with diesel-affected groundwater. The case was opened in January 1998 and was closed in January 2002.
Peninsula Tow Service	1071 Montgomery Avenue	LUST, San Mateo Co. BI, Cortese, CERS	Located 0.14 mile east (and downgradient) of the project site. The site is listed as a LUST site with a *Completed - Case Closed* status and a gasoline release to onsite soils. The case was opened in December 1986 and was closed in June 2002.
EFL Transportation	50 Tanforan Avenue	LUST, SWEEPS UST, HIST UST, San Mateo Co. BI, Cortese, HIST CORTESE, CERS	Located 0.15 mile north, northeast (and downgradient) of the project site. The site is listed as an Evaluation site with a *Completed - Case Closed* status and a diesel release to onsite groundwater. The case was opened in May 1994 and was closed in December 1996.

Site	Address	Databases	Site Status Summary and Location
1089 Montgomery Avenue, San Bruno	1089 Montgomery Avenue	ENVIROSTOR	Located 0.16 mile east (and downgradient) of the project site. The site is listed as an Evaluation site with an *Inactive - Needs Evaluation* status and an undisclosed release to onsite soils. The status date is listed as October 2018. No additional information provided.
SF Parking Inc DBA SFO Shuttle Bus	54 Tanforan Avenue	CPS-SLIC, HWTS, HAZNET, CERS	Located 0.17 mile northeast (and downgradient) of the project site. Spills, Leaks, Investigations, and Cleanups site with an *Open - Site Assessment* status as of January 2019. Contaminants of concern include lead and polycyclic aromatic hydrocarbons. Impacts are on soil only.
416 Browning (Former Goss-Jewett Facility)	416 Browning Way	CPS-SLIC, EMI, HWTS, CERS	Located 0.18 mile north (and downgradient) of the project site. Spills, Leaks, Investigations, and Cleanups site with an *Open - Assessment & Interim Remedial Action* status as of April 2021. Contaminants of concern include tetrachloroethylene. Impacts are on soil, soil vapor, and groundwater. Goss-Jewett owned the site from 1957–2011 and operated a dry-cleaning supply distribution business from 1957–2000 onsite. According to a *Response to Groundwater Monitoring Report - 416 Browning Way, South San Francisco, San Mateo County* (SFBRWQCB 2024) reviewed via GeoTracker, groundwater flow is to the northeast (away from the project site).
Maryatt Industries	290 S Maple Avenue	RCRA-SQG, CPS-SLIC, HIST UST, FINDS, ECHO, HWTS, HAZNET, CERS	Located 0.18 mile north (and downgradient) of the project site. Spills, Leaks, Investigations, and Cleanups site with an *Open - Assessment & Interim Remedial Action* status as of May 2019. Contaminants of concern include PCE. Impacts are on soil, soil vapor, and groundwater. The site was developed in 1958 by the American Linen Supply Company, which operated a commercial laundry and dry-cleaning business. The dry-cleaning business operated until 1992. Onsite contamination appears to be connected to a release at 416 Browning Way. According to a *Response to Groundwater Monitoring Report - 290 S Maple Avenue, South San Francisco, San Mateo County* (SFBRWQCB 2025) reviewed via GeoTracker, groundwater flow is to the north, northeast (away from the project site).
Pacific Bell	1465 Huntington Avenue	RCRA-SQG, LUST, HIST UST, FINDS, ECHO, Cortese, HIST CORTESE, CERS	Located 0.19 mile north, northwest (and downgradient) of the project site. The site is listed as a LUST site with a *Completed - Case Closed* status and a gasoline release to onsite groundwater. The case was opened in December 1985 and was closed in August 2010.

Site	Address	Databases	Site Status Summary and Location
H.S. Crocker Co.	1000 San Mateo Avenue	LUST, San Mateo Co. BI, Cortese, HIST CORTESE, CERS	Located 0.19 mile east, southeast (and downgradient) of the project site. The site is listed as a LUST site with a *Completed - Case Closed* status and a gasoline release to onsite groundwater. The case was opened in February 1988 and was closed in October 1998.
SBC	1101 San Mateo Avenue	RCRA-VSQG, LUST, SWEEPS UST, FINDS, San Mateo Co., Cortese EMI, HIST CORTESE, CERS	Located 0.22 mile east, northeast (and downgradient) of the project site. The site is listed as a LUST site with a *Completed - Case Closed* status and a gasoline release to onsite soils. The case was opened in May 1985 and was closed in November 2000.
Federal Supply Warehouse	1070 San Mateo Avenue	LUST, HAULERS, SWEEPS UST, San Mateo Co. BI, Cortese, HIST CORTESE, NPDES, CIWQS, CERS	Located 0.23 mile east (and downgradient) of the project site. The site is listed as a LUST site with a *Completed - Case Closed* status and a gasoline release to onsite groundwater. The case was opened in September 1990 and was closed in April 1997.
Cycle Shack, Inc.	1104 San Mateo Avenue	ENVIROSTOR, LUST, SWEEPS UST, HIST UST, CA FID UST, Cortese, EMI, HIST CORTESE, CERS	Located 0.23 mile east, northeast (and downgradient) of the project site. The site is listed as a LUST site with a *Completed - Case Closed* status and a gasoline release to onsite groundwater. The case was opened in June 1993 and was closed in November 2000. The site is also listed as a Tiered Permit site under EnviroStor. No violations or history of releases were identified as part of this listing.
The Crossing	900 Commodore Drive	ENVIROSTOR, LUST, VCP, San Mateo Co. BI, Cortese, CERS	Located 0.24 mile southwest (and upgradient) of the project site. The site is listed as a LUST site with a *Completed - Case Closed* status and a heating oil/fuel oil release to onsite groundwater. The case was opened in September 2003 and was closed in February 2004. The site is also listed as a Voluntary Cleanup site under EnviroStor. The site was listed as *Certified* as of September 2002 for a chlordane lead dieldrin release to onsite soils (associated with historical agricultural use).
Dupont	160 S Linden Avenue	RESPONSE, ENVIROSTOR, LUST, San Mateo Co. BI, Cortese, HIST CORTESE, NPDES, CIWQS, CERS, ENVIROSTOR, HIST Cal-Sites, HWP, HWTS, HAZNET	Located 0.25 mile north, northeast (and downgradient) of the project site. The site is listed as a LUST site with a *Completed - Case Closed* status and an arsenic, stoddard solvent/mineral spirits/distillates release to onsite groundwater. The case was opened in April 1987 and was closed in October 2011. Also listed as a Corrective Action site under EnviroStor with an *Inactive - Needs Evaluation* status as of March 2011. No additional information related to additional releases or violations was provided via EnviroStor. Also listed as a State Response site in RESPONSE and EnviroStor databases with a *Certified* status as of 1983. Contaminants and affected media were not disclosed.

Source: EDR 2024.
San Mateo Co. BI = San Mateo County Business Inventory; HIST CORTESE = Hazardous Waste & Substance Site List; LUST = Leaking Underground Fuel Tank Report; LTCP = Low-Threat Closure Policy; DCA = dichloroethane; PHA = polynuclear aromatic hydrocarbon; PCE = tetrachloroethylene; SWRCB = State Water Resources Control Board; PFAS = PFAS Contamination Site Location Listing; HWTS = Hazardous Waste Tracking System; HIST CORTESE = Hazardous Waste & Substance Site List; HAULERS = Registered Waste Tire Haulers Listing; CA FID UST = Facility Inventory Database; HAZNET = Facility and Manifest Data; FINDS = Facility Index System/Facility Registry System; CERS = California Environmental Reporting System; ECHO = Enforcement and Compliance History Information; CPS-SLIC = Cleanup Program Sites; SWEEPS UST = Statewide Environmental Evaluation and Planning System Underground Storage Tanks; HIST UST = Hazardous Substance Storage Container Database; EMI = Emissions Inventory Data; NPDES = National Pollutant Elimination System; CIWQS = California Integrated Water Quality System; RCRA-SQG = RCRA – Small-Quantity Generator; RCRA-VSQG = RCRA - Very Small Quantity Generators; RESPONSE = State Response Sites; CORTESE = Hazardous Waste and Substances Sites List; ENVIROSTOR = EnviroStor Database; HIST CAL-SITES = Calsites Database; HWP = EnviroStor Permitted Facilities Listing; VCP = Voluntary Cleanup Program Properties

Supplemental Environmental Database Review

As the environmental database information found in the Phase I ESAs is from July and October of 2021 and the environmental database search conducted and presented in Table 3.7-1 is from March 2024, ICF conducted a supplemental environmental database review in January 2025 via the SWRCB's *GeoTracker* and the DTSC's *EnviroStor* websites. The objective of the supplemental review was to search for sites that may have been newly listed between the preparation/publishing of the aforementioned reports and the preparation of this section. No newly listed sites were identified.

The February 2025 Phase I ESA listed above was provided subsequent to the 2021 Phase I ESAs, the environmental database search presented in Table 3.7-1, and the supplemental database review from January 2025. The February 2025 Phase I ESA did not identify any new listings as potential RECs.

Schools

There are no schools within 0.25 mile of the project site. The closest schools are El Portal School, 1280 Commodore Drive, San Bruno approximately 0.40 mile west, southwest of the project site, South San Francisco High School, 400 B St, South San Francisco approximately 0.58 mile to the north, northwest of the project site and Allen Elementary School, 875 Angus Ave W, San Bruno approximately 0.65 mile to the south.

Airports

SFO is approximately 0.7 mile east of the project site, as measured from the closest point on the project site to the runway. The project site is within the Federal Aviation Regulation Part 77 sphere of influence and within the boundaries of Airport Influence Area A and B of the SFO ALUCP. Refer to Section 3.9, *Land Use*, for further discussion of these designations.

3.7.3 Environmental Impact Analysis

This section describes the environmental impacts of the project on hazards and hazardous materials. It describes thresholds used to determine whether an impact would be significant and the methods used to evaluate the impacts. Measures to mitigate significant impacts are provided, where appropriate.

3.7.3.1 Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, the project would have the potential to have a significant effect on hazards and hazardous materials if it would result in any of the conditions listed below.

a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;

b. 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;

c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school;

d. 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;

e. 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;

f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan;

g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

3.7.3.2 Methodology and Approach

As described in Section 3.7.2.1, *Regulatory Setting*, the use of hazardous materials is subject to numerous laws and regulations. In most cases, the laws and regulations pertaining to hazardous materials management minimize risks to human health and the environment. The impact analysis identifies areas where impacts related to the use of hazardous materials during project construction and operation would be subject to applicable laws and regulations. To assess the project's potential to create a significant hazard for the public or environment related to subsurface hazardous materials, the impact analysis considers the potential pathways through which exposure to hazards could occur.

3.7.3.3 Buildout Scenario Evaluated

As discussed in Section 3.0.3.1, *Buildout Scenarios*, for each resource area studied, the EIR evaluates the scenario with the greatest potential to result in a significant impact. In some cases, impacts would be the same regardless of the buildout scenario, so the analysis does not evaluate a specific buildout scenario. This approach ensures that the EIR identifies the maximum potential impacts of the project based on reasonably foreseeable development outcomes. Table 3.7-2 summarizes the approach used for each impact analysis related to hazards and hazardous materials.

Table 3.7-2. Impact Analysis Approach for Hazards and Hazardous Materials

Impact Criteria	Scenario A	Scenario B	EIR Approach
Impact HAZ-1: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Scenario A has more Life Science Lab & Office use.	Scenario B has more residential use.	Scenario A. Both scenarios involve similar demolition and construction activities; therefore, the approach for addressing the use of hazards during construction is the same under both scenarios. The life science lab use would be greater under Scenario A and could involve more use of hazardous chemicals. Therefore, the operational analysis evaluates Scenario A.
Impact HAZ-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?	-	-	Same for both scenarios. The project footprint, the presence or absence of site contamination and hazardous conditions, and the project's general characteristics dictate impacts related to the release of hazardous materials. The project area, existing conditions, and general project characteristics are the same under both scenarios; therefore, the analysis approach is not based on one scenario or the other, and accounts for any future development that could occur under the project.
Impact HAZ-3: Emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Scenario A has more Life Science Lab & Office use.	Scenario B has more residential use.	Same for both scenarios. There are no schools within 0.25 mile of the project site.
Impact HAZ-4: Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	—	—	Same for both scenarios. The project site location and project footprint dictate impacts related to hazardous materials sites. The project site location and project footprint are the same under both scenarios; therefore, the analysis approach is not based on one scenario or the other, and accounts for any future development that could occur under the project.
Impact HAZ-5: Be located within an airport land use plan area or, where such a plan has not been adopted, be within 2 miles of a public airport or public use airport, and result in a safety hazard or excessive noise for people residing or working in the project area?	Scenario A has more Life Science Lab & Office use.	Scenario B has more residential use.	Both scenarios evaluated separately. The ALUCP includes compatibility standards specific to both R&D and residential uses. Therefore, both scenarios are evaluated separately.

Impact Criteria	Scenario A	Scenario B	EIR Approach
Impact HAZ-6: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	—	—	Both scenarios. Both scenarios have similar design features and uses; therefore, the approach for evaluating incompatible uses and physical design features is the same. As discussed in Section 3.14, *Transportation*, vehicle volumes would be greater under Scenario A in the morning and greater under Scenario B in the afternoon. Both scenarios would increase traffic volumes above what is present on the surrounding roadways today as well as concentrate volumes differently. Therefore, the emergency response/evacuation analysis evaluates the AM peak using Scenario A and the PM peak using Scenario B.
Impact HAZ-7: Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	—	—	Same for both scenarios. Both scenarios involve the same project area, which is not prone to wildfires. The project area, existing conditions, and general project characteristics are the same under both scenarios; therefore, the analysis approach is not based on one scenario or the other, and accounts for any future development that could occur under the project.

3.7.3.4 Impacts and Mitigation Measures

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

Construction

Project construction would involve routine transport, use, and disposal of hazardous materials such as solvents, paints, oils, grease, and caulking. Such transport, use, and disposal must comply with applicable regulations discussed under Section 3.7.2.1, *Regulatory Setting*. Although solvents, paints, oils, grease, and caulking would be transported, used, and disposed of during the construction phase, these materials are handled on a temporary basis and are typically used in construction projects and, thus, would not represent the routine transport, use, and disposal of acutely hazardous materials. Any spills or releases involving these materials are expected to be small, localized, and cleaned as they occur. In addition, a Stormwater Pollution Prevention Plan (SWPPP) would be prepared and implemented during project construction for coverage under the required Construction General Permit, in accordance with the requirements of the State Water Board. An SWPPP requires implementation of best management practices for hazardous materials storage and soil stockpiles, inspections, maintenance, employee training, and the containment of releases to prevent runoff to stormwater collection systems or waterways.

As discussed in Section 3.7.2, *Existing Conditions*, structures within the project site may contain hazardous building materials such as ACMs or lead-based paint. As mentioned, the project would demolish all existing uses on the project site with exception of the Century at Tanforan Theater and the Target. As such, demolition of existing structures may expose construction workers, the public,

or the environment to hazardous materials such as lead-based paint, asbestos, and polychlorinated biphenyls (PCBs). The level of potential impact depends on the age, construction, and building materials of each building. Any activity that involves cutting, grinding, or drilling during building renovation or demolition, or relocation of underground utilities, could release friable asbestos fibers or lead dust, unless proper precautions are taken. Potential exposure to hazardous building materials would be reduced through appropriate identification, removal, and disposal according to applicable regulations, such as the Bay Area Air Quality Management District's (BAAQMD), Regulation 11 Hazardous Pollutants. Buildings to be demolished that have not been previously surveyed would require a Hazardous Building Materials Survey as described under **Mitigation Measure HAZ-2-B**. If hazardous building materials are identified, the materials would require proper abatement and disposal.

Therefore, project construction would not create a significant hazard for the public or the environment through the routine transport, use, or disposal of hazardous materials during construction, and this impact would be ***less than significant***. No mitigation is required.

Operation

Under Scenario A, the project would be developed with R&D uses, including life science laboratory space, and office and amenity space. Due to the nature of R&D uses, the possibility exists for hazards related to the handling of hazardous materials, including biomedical materials and waste, to occur. Laboratories associated with R&D uses are categorized as biosafety levels (BSLs) 1 through 4. It is anticipated that the project could accommodate BSL-1, BSL-2, and/or BSL-3 laboratories.[8] BSL-4 laboratories,[9] which are much less common (with only four operational BSL-4 labs existing in the United States),[10] would not be permitted under the proposed PD zoning. As discussed in Impact HAZ-5, BSL-3 laboratories would only be allowed within the small portion of the project site that is outside SFO's Safety Zone 4. Any R&D tenant(s) handling qualifying hazardous materials would be required to adhere to all applicable federal, state and local regulations for qualifying hazardous materials, seek consultation with the San Mateo County Environmental Health Department (SMCEHD), and apply for applicable permits for any regulated substance that may pose a threat to

[8] **BSL-1** labs are used to study infectious agents or toxins not known to consistently cause disease in healthy adults. They follow basic safety procedures, called Standard Microbiological Practices and require no special equipment or design features.

BSL-2 laboratories are used to study moderate-risk infectious agents or toxins that pose a risk if accidentally inhaled, swallowed, or exposed to the skin. Design requirements for BSL-2 laboratories include hand washing sinks, eye washing stations in case of accidents, and doors that close automatically and lock. BSL-2 labs must also have access to equipment that can decontaminate laboratory waste, including an incinerator, an autoclave, and/or another method, depending on the biological risk assessment.

BSL-3 laboratories are used to study infectious agents or toxins that may be transmitted through the air and cause potentially lethal infection through inhalation exposure. Researchers perform all experiments in biosafety cabinets that use carefully controlled air flow or sealed enclosures to prevent infection. BSL-3 laboratories are designed to be easily decontaminated. These laboratories must use controlled, or "directional," air flow to ensure that air flows from non-laboratory areas (such as the hallway) into laboratory areas as an additional safety measure (ASPR 2025).

[9] **BSL-4** laboratories are used to study infectious agents or toxins that pose a high risk of aerosol-transmitted laboratory infections and life-threatening disease for which no vaccine or therapy is available. The laboratories incorporate all BSL 3 features and occupy safe, isolated zones within a larger building or may be housed in a separate, dedicated building. Access to BSL-4 laboratories is carefully controlled and requires significant training (ASPR 2025).

[10] National Institute of Allergy and Infectious Diseases. 2018. *The Need for Biosafety Labs*. Available: https://www.niaid.nih.gov/research/biosafety-labs-needed. Accessed: March 7, 2025.

public health and safety or the environment because they are highly toxic, flammable, or explosive. Tenants must comply with the safety procedures mandated by applicable federal, state, and local laws and regulations (e.g., RCRA, California Hazardous Waste Control Law, CCR Title 8) to ensure that risks resulting from the routine use of hazardous materials and disposal of hazardous wastes remain less than significant. In accordance with standard industry practice, R&D laboratories would also meet relevant Biosafety in Microbiological and Biomedical Laboratories and National Institute of Health guidelines applicable to the BSL, ensuring safe operating conditions and minimizing any risk of upset. In addition, registration of the hazardous materials through the SMCEHD Hazardous Material Business Plan Program would be required to ensure safe and responsible handling of those qualifying materials. Moreover, compliance with state and local regulations (e.g., City's Fire Code and National Fire Protection Association requirements) would ensure that buildings are equipped with safety measures to minimize potential impacts of the presence of hazardous materials.

Support office and related amenity uses included in Scenario A would involve the use of hazardous chemicals that are typical in retail, meeting space, and office settings (e.g., toners, paints, kitchen and restroom cleaners, other maintenance materials). Landscape maintenance on the project site would require the use of a wide variety of commercial products that are formulated with hazardous materials (e.g., fuels, cleaners and degreasers, solvents, paints, lubricants, adhesives, sealers, and pesticides/herbicides). Such materials are considered common and are unlikely to be stored or used in large quantities. Any spills involving these materials would be small and localized and would be cleaned up as they occur.

Finally, compliance with the California Department of Transportation (Caltrans) regulations would ensure that all necessary safety precautions would be taken during transport of hazardous materials during all phases of the project. Therefore, mandatory compliance with all applicable federal, state, and local regulations pertaining to the safe use, storage, transport and disposal of hazardous materials would ensure that the project would not create a significant hazard for the public or the environment through the routine transport, use, or disposal of hazardous materials during operation, and this impact would be ***less than significant***. No mitigation is required.

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 with Mitigation).

As discussed in Section 3.7.2, *Existing Conditions*, multiple site-specific Phase I ESA investigations were prepared in 2021 for the majority of the project site (certain reports cover select portions of the project site). Subsequently, a Phase I ESA (dated February 2025) covering the full footprint of the project site was prepared in March of 2025. The technical reports are included in full in Appendix 3.7-1, *Phase I Environmental Site Assessments*.

As discussed in the introduction to Chapter 3, the Housing Element Update IS/MND evaluated the development of up to 1,000 residential dwelling units on the project site at a program level. Mitigation Measure HAZ-2.2 requires any future project-level CEQA analysis of the project site to prepare a Phase I ESA and, if required based on the results of the Phase 1, a Phase II ESA. This analysis and the associated Phase I ESAs included in Appendix 3.7-1 fulfill that mitigation requirement.

The Phase I ESA associated with the 1150 and 1178 El Camino Real sites concluded that historical UST releases resulted in petroleum hydrocarbons and benzene concentrations above regulatory screening criteria in onsite groundwater; this was characterized as a REC. Other environmental considerations (not considered RECs) identified in the investigation were listed as 1) the sites' former uses, which may have included the use of hazardous materials, and 2) historical operations (associated with the use of hazardous materials) predating robust environmental regulations. In addition, non-ASTM Standard scope considerations were identified and listed as 3) the potential for ACMs and lead-based paint in onsite structures.

The Phase I ESA associated with the 1122 El Camino Real site did not identify any RECs. However, similar to the 1150 and 1178 El Camino Real Phase I ESA, other findings not considered RECs included 1) the sites' former uses, which may have included the use of hazardous materials, and 2) historical operations predating robust environmental regulations. Additionally, 3) former onsite USTs (without available closure documentation) were also listed as *other findings*. However, no release, suspected release, or potential material threat of a release was identified associated with the former USTs.

The Phase I ESA associated with the Shops at Tanforan (1122-1198 El Camino Real) and 300 Tanforan Park identified one REC. The REC consisted of onsite groundwater and soil contamination related to historical onsite uses. Impacts associated with the 1178 El Camino Real address included petroleum hydrocarbons in soils and groundwater as a result of historical USTs. According to the SMCDEH, active remediation was no longer required to address the UST impacts. Groundwater impacts associated with the San Bruno Police Station included petroleum hydrocarbons and benzene related to a UST onsite. Results of a final groundwater sampling event indicated that benzene and ethylbenzene were detected above commercial and industrial screening levels and petroleum hydrocarbons (as gasoline) exceeded the maximum contaminant levels for drinking water. The SMCDEH indicated that the site met the State Water Board's LTCP but noted that an unknown amount of hydrocarbon-impacted soil and groundwater remain in the subsurface. Future excavation and development of the site would require that the SMCDEH be notified.

As presented in Table 3.7-1, there were several hazardous materials release sites identified (within a 0.25-mile radius) with the potential to affect the project. The Sears Automotive Center/Sears #1478 site located at 1178 El Camino Real was identified as a LUST site within the project footprint with an *Open - Eligible for Closure* status. However, as noted previously, an unknown amount of hydrocarbon-affected soil and groundwater remain onsite and could expose construction personnel and the surrounding environment to affected media. Other open and active sites were also identified within the specified radius (Table 3.7-1), but either involved soil impacts only or groundwater flow away from the project site. As such, potential impacts on the project site associated with those off-site open and active sites are considered unlikely.

As mentioned, the potential for contaminated onsite soil or groundwater exists within the project site. Depending on the contaminant characteristics and extent of contamination in particular locations, ground disturbance and excavation activities conducted during construction are likely to encounter contaminated soil. Additionally, dewatering within the project site could result in the withdrawal of contaminated groundwater. If the groundwater contains contaminants above regulatory levels, a release of the water could present a hazard to people or the environment unless properly managed. Encountering contaminated soil or groundwater would create an exposure risk to construction personnel and the surrounding environment, resulting in a potentially significant impact.

To further address these risks, the project applicant would need to implement a Soil Management Plan (described in **Mitigation Measure HAZ-2-A**) to minimize the potential exposure of construction personnel to contaminated soils, unknown environmental conditions or subsurface features. Implementation of the Soil Management Plan would require coordination with the San Mateo County Environmental Health Division, which requires notification if soils or groundwater on or near the 1178 El Camino Real site or the San Bruno Police Station would be disturbed. In addition, to further address potential risks associated with contaminated groundwater, the project applicant would be required to conduct groundwater profiling to ensure adequate treatment and disposal of contaminated groundwater, if encountered, pursuant to **Mitigation Measure HWQ-1**. As construction would be conducted in coordination with the SMCDEH, the applicant would be subject to additional actions (to **Mitigation Measure HAZ-2-A** and **Mitigation Measure HWQ-1**) to further mitigate the potential exposure to, or release of residual, contaminated media onsite. If deemed necessary, these actions would be determined upon notification and consultation with the SMCDEH. With implementation of the identified mitigation measures and the standard regulatory compliance measures, potentially contaminated soils and groundwater would be handled, transported, and disposed of in accordance with applicable local, state, and federal regulations and requirements.

It is also reasonably foreseeable that potential upset and accident conditions involving the release of hazardous materials could occur resulting from previously unknown soil or groundwater contamination, such as encountering a previously unidentified UST. This potential risk would also be addressed in coordination and under oversight of the applicable oversight federal, state, or local agency (e.g., EPA, SWRCB, DTSC, or local Environmental Health or Fire Department). The type and extent of the contamination will dictate the appropriate response and remediation appropriate for the site and the agencies to be notified. Moreover, the aforementioned Soil Management Plan would provide protocols on how to identify and handle previously undocumented contaminants and unidentified subsurface features such as a previously undocumented UST. Additional details are provided under the *Mitigation Measures* section below.

Refer to Impact HAZ-1 and Impact HAZ-5 regarding the potential risk of upset of hazardous materials associated with the operation of R&D laboratories on-site.

With compliance with regulatory requirements and implementation of the mitigation measures described, impacts associated with the potential upset and accident conditions involving the release of hazardous materials into the environment would be ***less than significant with mitigation***.

Mitigation Measures

Mitigation Measure HAZ-2-A: Prepare a Soil Management Plan Prior to Construction.

Prior to issuance of any grading permit, the applicant shall retain the services of a qualified environmental engineering firm to prepare and implement, during site preparation, grading, and excavation activities, the necessary Soil Management Plans (SMP) for the area covered by the grading permit. The SMPs must be submitted to the City of San Bruno for review and approval (also prior to issuance of a grading permit). The SMPs shall be designed to protect human health of construction workers, the public, and the environment during site preparation, grading, and excavation activities by including protocols, measures, and techniques for the proper handling, management, and disposition of affected soils found on the site and any areas of off-site work during site preparation and grading activities. The SMPs shall also ensure the proper characterization, management, and/or disposal of contaminated environmental media that is above applicable Environmental Screening Levels by recommending additional sampling

activities (as necessary), including profile sampling for proper disposal. The SMPs shall be prepared by a commercial environmental engineering firm with demonstrated expertise and experience in the preparation of SMPs and shall be stamped by an appropriately licensed professional. The SMPs shall be implemented by the applicant and the applicable construction contractor throughout all ground-disturbing work.

The SMPs shall establish protocols and measures for addressing the discovery of presently unknown environmental conditions or subsurface structures such as USTs, sumps, or wells. These protocols and measures could include (but are not limited to):

- Notification of applicable oversight agency such as the City of San Bruno, the State Water Board, etc.
- Decontamination and decommissioning of the subsurface structure under guidance of the applicable oversight agency.
- Sampling (soil, soil vapor, and/or groundwater) to evaluate potential impacts to subsurface and to determine proper disposal of impacted materials.

If the environmental engineering firm subsequently identifies the need for further sampling, the project applicant shall implement this and any other requirements identified in the SMPs. The project applicant shall notify and coordinate implementation of the SMP with SMCEHD. If directed by SMCEHD, the project applicant shall conduct additional site investigation and characterization prior to construction to ensure that hazardous materials in onsite media do not exceed applicable regulatory thresholds.

Mitigation Measure HAZ-2-B: Conduct a Hazardous Building Materials Survey prior to Demolition Activities and Hazardous Building Material Handling.

Prior to the issuance of any demolition permit, the applicant shall ensure that a Hazardous Building Materials Survey is conducted by a licensed contractor on structures that will be demolished and have not been surveyed previously. The Hazardous Building Materials Survey shall identify the presence of hazardous building materials including ACMs, lead-based paint, and PCBs. Should this survey determine that ACMs, lead-based paint, or other hazardous building materials are present, the following actions shall be implemented by the applicant.

- A health and safety plan shall be developed by a certified industrial hygienist for potential ACMs, lead-based paint, or other hazardous building materials risks present during demolition. The health and safety plan shall then be implemented by a licensed contractor. The health and safety plan shall comply with federal OSHA and Cal/OSHA requirements.
- Necessary approvals shall be acquired from the City of San Bruno or County of San Mateo (by the licensed contractor) for specifications or commencement of abatement activities. Abatement activities shall be conducted by a licensed contractor.
- Prior to demolition of building materials containing asbestos, the BAAQMD shall be notified ten days prior to initiating construction and demolition activities. Section 19827.5 of the California Health and Safety Code requires that local agencies not issue demolition or alteration permits until an applicant has demonstrated compliance with notification requirements under applicable federal regulations regarding hazardous air pollutants, including asbestos. In addition:

  - Asbestos shall be disposed of at a licensed disposal facility to be identified by the licensed contractor.
  - The local office of the Cal/OSHA shall be notified of asbestos abatement activities.
  - Asbestos abatement contractors shall follow state regulations contained in 8 CCR 1529 and 8 CCR 341.6 through 341.14 where there is asbestos-related work involving 100 square feet or more of ACMs.
- Asbestos removal contractors shall be certified as such by the Contractors Licensing Board of the State of California.
- The contractor and hauler of hazardous building materials shall file a Hazardous Waste Manifest that details the hauling of the material from the site and the disposal of it. Pursuant to California law, the City of San Bruno shall not issue the required permit until the applicant has complied with the notice requirements described above.

Mitigation Measure HWQ-1: Require Groundwater Monitoring and Sampling Prior to Dewatering Activity.

Refer to Section 3.8, *Hydrology*, of this EIR.

Impact HAZ-3: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school (No Impact).

There are no existing schools within 0.25 mile of the project site. The nearest school is the El Portal School located approximately 0.35 mile to the west, southwest of the project site. Thus, the project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of a school. ***No impact*** would occur.

Impact HAZ-4: Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment (Less than Significant with Mitigation).

The Sears Automotive Center/Sears #1478 site listed in Table 3.7-1 is located on the project site. This site was identified in the LUST database, and therefore meets the requirements of a Cortese List site. The site is listed with an *Open - Eligible for Closure* status and is undergoing closure under SWRCB's LTCP, with the San Mateo County Environmental Health Division overseeing the closure. According to information reviewed during the preparation of this analysis, an unknown amount of hydrocarbon-affected soil and groundwater remain onsite. The project applicant is required to notify the San Mateo County Environmental Health Division of any excavation or redevelopment on the site. Additionally, implementation of a Soil Management Plan (**Mitigation Measure HAZ-2-A**) would further minimize the potential exposure of construction personnel to contaminated soils, unknown environmental conditions, or subsurface features associated with the site. Potential impacts associated with being located on a Cortese List site would be ***less than significant with mitigation***. For additional details, please refer to Impact HAZ-2.

Impact HAZ-5: For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 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 (Less than Significant with Mitigation).

SFO is approximately 0.7 mile east of the project site, as measured from the closest point on the project site to the runway. The project site is located within the Federal Aviation Regulation Part 77 sphere of influence and within the boundaries of Airport Influence Area A and B of the SFO ALUCP. As such, the compatibility criteria contained within the ALUCP are applicable to development within the project site. The comprehensive SFO ALUCP is used by the City/County Association of Governments of San Mateo County (C/CAG) to promote compatibility between SFO and surrounding land uses. The ALUCP compatibility criteria, as derived from the Federal Aviation Administration (FAA), are used to safeguard the general welfare of the public.

In general, height limitations and restrictions in the area are defined by the SFO Airport Influence Area. According to the 2012 SFO ALUCP, notification and consultation with the FAA under CFR Part 77.9 would be required for implementation of the project. Building heights under the project would be subject to maximum height limits in accordance with the FAA and SFO ALUCP Land Use Compatibility Plan requirements; maximum heights would depend on the applicable height contours under these regulations. As mentioned previously, the ground elevation at the project site ranges from 36 to 66 feet AMSL NAVD88. Assuming ground elevations do not change, the heights of the proposed buildings (i.e., critical aeronautical surfaces) could be no higher than approximately 55 and 90 feet above ground level to be compatible with the SFO ALUCP (equivalent to 125 to 145 feet AMSL). Such compatibility would also be contingent on the issuance of a Determination of No Hazard from the FAA for any proposed structures and determinations from C/CAG as the designated ALUC. As shown in Figure 2-10 in Chapter 2, *Project Description*, proposed building heights would range from 20 to 80 feet above ground level, depending on the location within the project site. The use of construction equipment (such as building cranes) or the construction of buildings with heights in excess of 55 feet above ground level could also pose a safety hazard to construction workers and future residents. **Mitigation Measure HAZ-5** requires the applicant to submit a plan with a list of equipment to be used during construction that includes their height and proposed area of operation to the City for review and approval. The mitigation measure also requires compliance with SFO building height requirements. Mitigation Measure HAZ-5 supersedes Mitigation Measure HAZ-5.1 in the Housing Element Initial Study/Mitigated Negative Declaration (IS/MND) and is equally as effective in mitigating impacts on aviation safety at the project site. With issuance of a Determination of No Hazard from the FAA, and compliance with **Mitigation Measure HAZ-5**, project construction and operation would comply with SFO ALUCP safety guidelines and would not pose a risk to aviation safety.

As previously discussed, the ALUCP identifies five Safety Compatibility Zones in the vicinity of SFO. As shown in Figure 3.7-1, *ALUCP Safety Compatibility Zones*, the majority of the project site is within Safety Zone 4, the Outer Approach/Departure Zone. Incompatible uses within Safety Zone 4 include large child day care centers, BSL 3 and 4 facilities, and children's schools. The proposed P-D zoning would not allow for the development of large child day care centers, BSL 4 facilities, or children's schools anywhere on the site. BSL-3 laboratories would only be allowed within the small portion of the project site that is outside Safety Zone 4. Uses to be avoided in Safety Zone 4 include hazardous uses other than BSL 3 and 4 facilities (which include BSL 1 and 2 facilities) and critical public utilities. Such uses are determined to be "not incompatible", but are classified as uses that should be avoided "unless no feasible alternative is available." In addition, the safety compatibility criteria

state that where such uses are allowed, habitable structures shall be provided with at least 50 percent more exits than required by applicable codes.[11] Where the 50 percent factor results in a fraction, the number of additional exits shall be rounded to the next highest whole number. The project does not propose critical public utilities. BSL 1 and 2 facilities would be allowed throughout the project site, including in Safety Zone 4. BSL 1 and 2 facilities in Safety Zone 4 would be required under the P-D zoning to provide exits in accordance with ALUCP requirements. As such, the project would be consistent with the ALUCP's Safety Compatibility Policies SP-1 and SP-2. As discussed in Section 3.10, *Noise*, of this EIR, with mitigation, impacts related to aircraft noise would be considered less than significant.

As discussed in Section 2.6.4, *Landscape and Trees*, in Chapter 2, *Project Description*, the project would remove approximately 114 trees and plant approximately 475 trees, for a net increase of 361 trees on the project site. The increased landscaping could potentially attract more birds to the project site, which could in turn increase the potential for aircraft-involved bird strike due to the project site's proximity to SFO. However, as described in Section 3.2 *Biological Resources*, the project site and surrounding area are fully developed and do not connect directly to areas of natural open space. Given that the area surrounding the project site is heavily urbanized, large numbers of birds are not expected to be flying over the project site for substantial bird strikes to occur. While more birds may be present on the site compared to existing conditions, given the heavily urbanized nature of the area, the introduction of more trees is unlikely to substantially change the existing bird population dynamics and flight patterns. ALUCP Policy AP-4 states that land uses that attract large flocks of birds can result in increased risks related to aircraft-involved bird strike. Examples include waste disposal sites and wetlands. The project does not propose these or any other type of use that would be expected to attract large flocks of birds. The ALUCP (p. 289) also states that "[s]pecies most commonly associated with aircraft damage include vultures, geese, cormorants and pelicans, cranes, eagles, ducks, and osprey." The ornamental trees included in the proposed landscape plan generally are not considered suitable habitat for these species and would be unlikely to attract these species to the project site. Furthermore, historical data show that bird strikes at SFO are relatively rare, and bird strikes causing substantial damage to aircraft are exceedingly rare. From 2020 to 2024, there were 237 incidents where birds caused minor or unspecified damage to aircraft, and no events causing substantial damage or destruction (FAA 2025). Given the high volume of flights at SFO (approximately 1,000 flights per day), this number represents a very small percentage of total flights (City and County of San Francisco n.d.). Additionally, SFO has robust wildlife management practices in place to mitigate bird strike risks. Therefore, the risk of hazards to aircraft from bird strike is considered low.

According to ALUCP Policy AP-4, specific building characteristics can create hazards to aircraft in flight, including highly reflective buildings or building features, bright lights, including search lights or laser displays, or otherwise distracting lights. The project does not include any such features. All lighting would comply with Title 24, CalGreen outdoor lighting requirements for non-residential occupancies, and all Dark Sky Initiatives applicable to San Bruno. Additionally, offsite roadway lighting would comply with San Bruno lighting standards for fixture selection and illumination requirements. Therefore, the risk of hazards to aircraft from light and glare is considered low.

In summary, the project would be consistent with applicable safety- and noise-related policies under the SFO ALUCP with implementation of mitigation. As such, the project would not pose a safety

[11] "Habitable structures" are assumed to include any occupiable structure, not just residential uses.

hazard or generate excessive noise for people working in the project area. Impacts would be ***less than significant with mitigation***.

Mitigation Measures

Mitigation Measure HAZ-5: Demonstrate Compliance with San Francisco International Airport Airspace Compatibility Policies.

The project applicant shall comply with the following measures.

- Prior to the issuance of any construction or building permits, the applicant shall submit a plan with a list of equipment to be used during construction that includes their height and proposed area of operation to the Director of Community Development or the Director's designee. The use of equipment in locations where it would penetrate critical aeronautical surfaces shall be expressly prohibited by any construction or building permits issued, unless use of specific temporary construction equipment is so approved by the FAA. The use of temporary construction equipment (e.g., cranes) may be used to construct the permanent structures. Cranes may be in excess of ALUCP surfaces and may exceed FAA height constraints. Since cranes are used on a temporary basis, FAA approvals would be pursued (as needed) to allow these pieces of equipment to operate through the construction of the permanent structures.

  The aforementioned equipment plan shall include a page depicting the critical aeronautical surfaces on-site, a list of all equipment with heights of 55 feet or greater and their respective heights, and informs construction workers that the use of equipment with heights that would penetrate critical aeronautical surfaces is prohibited.

- The project shall comply with Policy AP-3 of the Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport (ALUCP). Buildings with heights in excess of the applicable critical aeronautical surface as shown in Exhibit IV-17 of the ALUCP shall be prohibited unless the FAA determines the proposed building height is not a hazard to air navigation in an aeronautical study prepared pursuant to the filing of Form 7460-1. Proof of compliance with Policy AP-3 of the ALUCP shall be provided to the Director of Community Development or the Director's designee prior to issuance of any construction or building permits.

Impact HAZ-6: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan (Less than Significant).

Project development would not include any permanent changes to existing public roadways that provide emergency access to the project site or surrounding area. The project consists of redevelopment that includes transit-oriented, mixed-use development including housing; retail uses; life science laboratory uses; office uses; private and publicly accessible, privately owned open space; and the potential construction of a hotel. It is possible that construction activity associated with the project could affect emergency response or evacuation plans due to temporary construction barricades or other roadway obstructions that could impede emergency access onsite. However, compliance with City requirements regarding emergency access during construction activities would minimize potential impacts associated with emergency response times and access; therefore, emergency response access or emergency evacuation plan routes would not be impeded significantly during the construction period.

As discussed in Appendix 3.14-2, *Vehicle Level of Service Analysis Memo*, the project would increase vehicle congestion on nearby roadways, including evacuation routes like El Camino Real. As further discussed under Impact TRA-4 in Section 3.14, *Transportation*, project traffic would not cause a substantial adverse effect on emergency access or response. Also, the project would not involve any features that would impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. On the contrary, the project would include a revised internal roadway configuration that would enhance vehicular, emergency vehicle, pedestrian, and bicycle access in, to and through the project site. This would ensure that police, fire, and emergency medical service vehicles can safely and efficiently navigate through the project area. Therefore, development of the project is not expected to interfere with the County of San Mateo's Emergency Operations Plan or any evacuation route. Rather, access to the project site would be improved by incorporating the aforementioned internal roadway configuration.

Furthermore, R&D tenants who handle hazardous materials would be required to adhere to all applicable regulations including the California Hazardous Materials Release Response Plans and Inventory Law (also known as the Hazardous Materials Business Plan program) and the Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (the San Mateo County Department of Environmental Health is the City's Certified Unified Program Agency or CUPA). Adherence to the aforementioned regulations and plans would ensure a proper response and evacuation in the event of an emergency associated with a hazardous material release.

Therefore, the project would not impair implementation of or interfere with an adopted emergency response plan or emergency evacuation plan and this impact would be ***less than significant***.

Impact HAZ-7: 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 in a highly developed area, and no wildlands are intermixed. Land uses surrounding the project site include commercial (north and west), residential (east and south), and industrial (northeast). A San Bruno Bay Area Rapid Transit (BART) station is located immediately to the northeast of the project site. The closest wildlands area is Sign Hill Park located approximately 1.5 miles from the project site. According to CAL FIRE, the project site is not within a Very High Fire Hazard Severity Zone (CAL FIRE 2023). The project would not exacerbate wildfire risks of any nature, and it is not located in or near a Local or State Responsibility area with a Very High Fire Hazard Severity Zone designation. Thus, the project is not susceptible to significant risk of loss, injury or death involving wildland fires. The project site is adjacent to a City-designated Wildland/Urban Interface Hazard Area that generally aligns with I-380 (City of San Bruno 2023). Adherence with General Plan Policy PFS-30 would require the project to install and maintain a variety of fire protection measures, and all construction would be required by the City's Municipal Code to be built to current California and International Fire Code standards with fire suppression systems. Further, as discussed in Section 3.12, *Public Services*, fire protection services are adequate to meet new demand generated by the project. For these reasons, the project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Impacts would be ***less than significant***.

3.7.4 References Cited

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3.8 Hydrology and Water Quality

This section evaluates the potential impacts on hydrology that could result from construction and operation of the Tanforan Redevelopment Project (project). This section also describes existing conditions at the project site as well as the regulatory framework for this analysis. Impacts resulting from implementation of the project, and feasible mitigation measures, where applicable, are also described.

Relevant technical documentation used in this analysis includes the following technical studies prepared for the project.

- Appendix 3.8-1, *Storm Drain System Capacity Study*, prepared by Lotus Water Engineering, March 2025.
- Appendix 3.8-2, *Groundwater Assessment for Redevelopment of the Tanforan Shopping Center City of San Bruno*, prepared by EKI, May 2025.
- Appendix 3.8-3, *C.3 and C.6 Development Review Checklists* prepared by BKF Engineers, April 2025.

No questions or concerns related to hydrology and water quality were raised in the Notice of Preparation (NOP) or revised NOP comments.

3.8.1 Existing Conditions

3.8.1.1 Regulatory Setting

This section summarizes regulations and policies that are relevant to the analysis of the project's potential impacts on hydrology.

Federal

Clean Water Act

The federal Clean Water Act (CWA) was enacted with the primary purpose of restoring and maintaining the chemical, physical, and biological integrity of the nation's waters. The CWA directs states to establish water quality standards for all "waters of the United States" and to review and update such standards on a triennial basis.

The U.S. Environmental Protection Agency (EPA) has delegated responsibility for implementation of portions of the CWA, including water quality control planning and control programs, such as the National Pollutant Discharge Elimination System (NPDES) program, to the State Water Resources Control Board (State Water Board) and the Regional Water Quality Control Boards (Regional Water Boards). The State Water Board establishes statewide policies and regulations for the implementation of water quality control programs mandated by federal and state water quality statutes and regulations. The Regional Water Boards develop and implement water quality control plans (basin plans) that identify the beneficial uses of surface and ground waters, water quality characteristics, and water quality problems.

- **Section 303(d) and total maximum daily loads.** The CWA contains two strategies for managing water quality. One is a technology-based approach that includes requirements to maintain a minimum level of pollutant management using the best available technology. The other is a water quality-based approach that relies on evaluating the condition of surface waters and setting limitations on the amount of pollution that the water can be exposed to without adversely affecting the beneficial uses of those waters. Section 303(d) of the CWA bridges these two strategies. Section 303(d) requires that the states make a list of waters that are not attaining standards after the technology-based limits are put into place. For waters on this list (and where the EPA administrator deems they are appropriate), the states are to develop total maximum daily loads (TMDLs). TMDLs are established at the level necessary to implement the applicable water quality standards. The CWA does not expressly require the implementation of TMDLs. However, federal regulations require that an implementation plan be developed along with the TMDL and Sections 303(d), and 303(e), and their implementing regulations require that approved TMDLs be incorporated into basin plans. EPA has established regulations (40 CFR 122) that require that NPDES permits be revised to be consistent with any approved TMDL. A mercury TMDL has been established for the San Francisco Bay and approved by the State Water Board (Resolution 2007-0045). TMDLs for the other constituents that contribute to impairment are scheduled to be completed by 2037.
- **Section 404 dredge/fill permitting.** The discharge of dredged or fill material into waters of the United States is subject to permitting specified under Section 404 (Discharges of Dredge or Fill Material) of the CWA. Section 404 of the CWA regulates placement of fill materials into the waters of the United States. The U.S. Army Corps of Engineers (USACE) administers section 404 permits.
- **Section 401 Water Quality Certification.** Section 401 of the CWA requires that an applicant pursuing a federal permit to conduct an activity that may result in a discharge of a pollutant obtain a Water Quality Certification (or waiver). A Water Quality Certification requires the evaluation of water quality considerations associated with dredging or placement of fill materials into waters of the United States. Water Quality Certifications are issued by one of the nine geographically separated Regional Water Boards in California. Under the CWA, the Regional Water Board must issue or waive a Section 401 Water Quality Certification for a project to be permitted under CWA Section 404.
- **Section 402—National Pollutant Discharge Elimination System.** The 1972 amendments to the federal Water Pollution Control Act established the NPDES permit program to control discharges of pollutants from point sources (Section 402). The 1987 amendments to the CWA created a new section of the CWA devoted to stormwater permitting (Section 402[p]). EPA has granted the State of California (the State Water Board and Regional Water Boards) primacy in administering and enforcing the provisions of CWA and NPDES. NPDES is the primary federal program that regulates point-source and nonpoint-source discharges to waters of the United States.
    - *NPDES General Permit for Construction Activities.* Most construction activities that disturb 1 acre of land or more are required to obtain coverage under the NPDES General Permit for Construction Activities (Construction General Permit). The State Water Board has issued a statewide Construction General Permit (Order No. 2022-0057-DWQ, NPDES No. CAS000002), adopted September 8, 2022. Construction activities subject to the Construction General Permit include clearing, grading, and disturbances to the ground, such as stockpiling or excavation, that result in soil disturbances of at least 1 acre of total land area. The

Construction General Permit requires the applicant to file a notice of intent to discharge stormwater and to prepare and implement a stormwater pollution prevention plan (SWPPP). The SWPPP includes a site map and a description of proposed construction activities, along with a demonstration of compliance with relevant local ordinances and regulations, and an overview of the best management practices (BMPs) that would be implemented to prevent soil erosion and discharge of other construction-related pollutants that could contaminate nearby water resources. Permittees are further required to conduct annual monitoring and reporting to ensure that BMPs are correctly implemented and effective in controlling the discharge of stormwater-related pollutants.

- *NPDES General Municipal Stormwater Permit.* CWA Section 402 mandates permits for municipal stormwater discharges, which are regulated under the NPDES General Permit for Municipal Separate Storm Sewer Systems (MS4) (MS4 Permit). MS4 Permits require that cities and counties develop and implement programs and measures to reduce the discharge of pollutants in stormwater discharges to the maximum extent possible, including management practices, control techniques, system design and engineering methods, and other measures as appropriate. As part of permit compliance, these permit holders have created stormwater management plans for their respective locations. These plans outline the requirements for municipal operations, industrial and commercial businesses, construction sites, and planning and land development. These requirements may include multiple measures to control pollutants in stormwater discharge. During implementation of specific projects under the program, project applicants will be required to follow the guidance contained in the stormwater management plans as defined by the permit holder in that location. The discharge of stormwater runoff from the MS4 in San Mateo County are permitted under the San Francisco Bay Municipal Regional Permit (MRP) (Order No. R2-2022-0018; NPDES Permit No. CAS612008).

National Flood Insurance Program

The Federal Emergency Management Agency (FEMA) is responsible for determining, based on USACE studies, flood elevations and floodplain boundaries. FEMA is also responsible for distributing the Flood Insurance Rate Maps (FIRMs), which are used in the National Flood Insurance Program. These maps identify the locations of special flood hazard areas, including the 100-year floodplain. FEMA allows non-residential development in the floodplain; however, construction activities are restricted within the flood hazard areas, depending on the potential for flooding within each area.

State

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act (Porter-Cologne Act) is established and implemented by the State Water Board and nine Regional Water Boards. Waters of the state are defined more broadly than "waters of the United States;" they are defined as any surface water or groundwater, including saline waters, within the boundaries of the state. This includes waters in both natural and artificial channels. The act requires projects that are discharging, or proposing to discharge, wastes that could affect the quality of the state's water to file a waste discharge report with the appropriate Regional Water Board. The Porter-Cologne Act also requires that the State Water Board or a Regional Water Board adopt basin plans for the protection of water quality. The San Francisco Bay Basin (Region 2) Water Quality Control Plan (Basin Plan) specifies region-wide and water body–

specific beneficial uses and sets numeric and narrative water quality objectives for several substances and parameters in numerous surface waters in its region (SFBRWQCB 2024). The project lies within the jurisdiction of the San Francisco Bay Regional Water Board. The Basin Plan was last updated in 2024 (SFBRWQCB 2024). Beneficial uses, water quality objectives, and Section 303(d)-listed impairments are described for the project site below in the *Surface Water Quality* section.

The Basin Plan also establishes beneficial water uses for groundwater basins in the region. The South Westside Groundwater Basin (known as the Westside D groundwater basin in the Basin Plan) underlies the project site and is listed in the Basin Plan as providing existing beneficial uses that include municipal and domestic water supply, industrial process water supply, and industrial service water supply and potential beneficial uses that include agricultural water supply. The basin names, such as Westside A, Westside B, etc., are informal names assigned by the Regional Water Board to preserve the beneficial use designations in the 1995 Basin Plan and do not represent sub-basins identified by the Department of Water Resources (DWR).

Sustainable Groundwater Management Act

The Sustainable Groundwater Management Act of 2014 (SGMA) is a comprehensive three-bill package that Governor Jerry Brown signed into California state law in September 2014. The SGMA provides a framework for sustainable management of groundwater supplies by local authorities, with a limited role for state intervention only if necessary, to protect the resource. The plan is intended to ensure a reliable groundwater water supply for California for years to come. The SGMA requires the formation of local Groundwater Sustainability Agencies (GSA), which are required to adopt groundwater sustainability plans (GSPs) to manage the sustainability of groundwater basins. GSAs for all high- and medium-priority basins, as identified by DWR, must adopt a GSP, or submit an alternative to a GSP. The SGMA also requires governments and water agencies of high- and medium-priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. GSPs for high- and medium-priority basins are due to DWR by January 31, 2022; however, GSPs for critically over-drafted high- and medium-priority basins were due to DWR by January 31, 2020. The project overlies the Westside Groundwater Basin, which is designated as a very low-priority basin and not subject to the SGMA. The voluntary *SouthWestside Basin Groundwater Management Plan* provides a framework for regional groundwater management in the South Westside Basin that sustains the beneficial use of the groundwater resource. More information regarding groundwater in relation to water supply is provided in Section 3.16, *Utilities*, of this EIR and is described in Appendix 3.16-1, *Water Supply Assessment*.

Regional and Local

San Francisco Bay Municipal Regional Stormwater Permit

The San Francisco Bay Regional Water Quality Control Board issued the most recent MS4 Phase I San Francisco Bay Region Municipal Regional Stormwater NPDES Permit No. CAS029718 (Order No. R2-2022-0018 NPDES Permit No. CAS612008, as amended by Order No. R2-2023-0019) (San Francisco Bay MRP) on May 11, 2022. The City of San Bruno is a permittee under the San Francisco Bay MRP for the discharge of stormwater runoff from the MS4s. The current San Francisco Bay MRP expires on June 30, 2027. The following requirements apply to all projects regardless of size, as appropriate.

- Construction-phase BMPs.
- Post-construction site design measures to maximize infiltration in pervious areas.
- Post-construction source control measures to help keep pollutants out of stormwater.

The following requirements apply to certain projects based on project size and/or location.

- **Post-construction stormwater treatment measures.** Post-construction stormwater treatment measures are required for most projects with 10,000 square feet or more of impervious surface.
- **Post-construction stormwater quantity controls.** Post-construction stormwater quantity (flow-peak, volume, and duration) controls are required for projects in certain locations with 1 acre or more of impervious surface, in accordance with local Hydromodification Management Plans.[1]
- **Provision C.3 requirements.** Provision C.3 of the San Francisco Bay MRP requires new development and redevelopment source control, site design, and stormwater treatment measures to address pollutant discharges in stormwater runoff. This goal is accomplished through Low-Impact Development (LID) techniques, including infiltration and biotreatment. The current MRP regulates stormwater treatment for new development, but recognizes that certain urban infill, higher density and transit-oriented developments have some inherent environmental benefits and challenges. These types of projects, known as "Special Projects," are allowed to use specific types of non-LID treatment measures to treat a certain percentage of the site's runoff.

The project is a new development project; therefore, it would be considered a Regulated Project under the San Francisco Bay MRP. More specifically, the project falls within the "Other Redevelopment Projects" category within the C.3 Provision, which is defined as "any land-disturbing activity that results in the creation, addition, or replacement of exterior impervious surface area on a site on which some past development has occurred." These projects include those that create or replace 10,000 square feet or more of impervious surface, which applies to the project. To meet the Provision C.3 requirements, projects must include appropriate site design measures, pollutant source controls and treatment control measures.

The San Mateo Countywide Water Pollution Prevention Program (SMCWPPP) is a partnership of the City/County Association of Governments, each incorporated city and town in the county, and San Mateo County, which share a common NPDES permit. The project would be required to comply with the San Francisco Bay MRP Provision C.3 Stormwater Technical Guidance. Municipalities apply the Maximum Extent Practicable standard, including standard stormwater conditions of approval for projects that receive development permits. The SMCWPPP prepared a C.3 Stormwater Technical Guidance dated September 2023 to assist projects in designing appropriate post-construction stormwater controls to meet local jurisdictional requirements and the requirements of the San Francisco Bay MRP. The C.3 and C.6 Development Review Checklist is required for all projects requiring a Planning or Building permit that would result in any new areas of impervious surface. SMCWPPP Provision C.3.g (Hydromodification Control Requirements) requires that certain new development projects manage increases in stormwater runoff flow and volume. Permittees, including the City of San Bruno, have developed maps showing where hydromodification controls

[1] Hydromodification is the change in a site's runoff hydrograph, including increases in flows and durations that results when land is developed (made more impervious).

are required. The project is exempt from SMCWPPP Permit Provision C.3.g because the project site is outside the limits of hydromodification areas.

San Mateo County Flood Control and Sea Level Rise Resiliency District

The Flood and Sea Level Rise Resiliency District coordinates cross-jurisdictional collaborations to manage impending flooding threats. The district initiates countywide efforts to address sea level rise, flooding, coastal erosion, and large-scale stormwater infrastructure improvements through integrated regional planning, project implementation, and long-term maintenance. Comprising the 20 incorporated cities, C/CAG, and San Mateo County, the district's purpose is to create a unified agency to cost-effectively implement resilient infrastructure to face flood challenges. The district manages flood control zones in Colma Creek, San Bruno Creek, San Francisquito Creek, and Ravenswood Slough. The Flood and Sea Level Rise Resiliency District was created by modifying the existing Flood Control District through state legislation, AB 825 (2019–2020).

South Westside Basin Groundwater Management Plan

The South Westside Basin Groundwater Management Plan (GWMP) was completed in July 2012 as a joint effort between Cal Water, the San Francisco Public Utilities Commission (SFPUC), and Daly City and the City of San Bruno that superseded prior groundwater management and planning efforts. The GWMP was prepared pursuant to Assembly Bill (AB) 3030 (codified in California Water Coad §10750 et seq.). The GWMP ensures a sustainable, high-quality, reliable water supply at a fair price for beneficial uses achieved through local groundwater management. The GWMP provides steps for monitoring water quality and quantity in the South Westside Basin. Each groundwater well identified in the GWMP has defined triggers for overdraft, seawater intrusion, various water quality measures, and has identified two levels of trigger thresholds for each groundwater well based on historical water levels, and actions to address the trigger that is met.

The GWMP includes the following elements.

- Groundwater Storage and Quality Monitoring
- Control of Saltwater Intrusion
- Conjunctive Use
- Recycled Water
- Source Water Protection

San Bruno General Plan

The *San Bruno General Plan*, adopted in 2009, includes goals and policies associated with hydrology and water quality (City of San Bruno 2009a, b). The *San Bruno General Plan* has identified policies from Environmental Resources and Conservation, and Health and Safety Elements related to hydrology, water quality, groundwater resources, stormwater, and minimizing flooding. The *San Bruno General Plan* includes the following policies applicable to hydrology and water quality adopted for the purpose of avoiding or minimizing environmental effects that are relevant to the project.

- **ERC-19:** Regulate new development—specifically industrial uses—as well as construction and demolition practices to minimize pollutant and sediment concentrations in receiving waters an ensure waterbodies within San Bruno and surface water discharged into San Francisco Bay meets or exceeds relevant regulatory water quality standards.

- **ERC-20:** Require implementation of Best Management Practices to reduce accumulation of non-point source pollutants in the drainage system originating from streets, parking lots, residential areas, businesses, and industrial operations.
- **ERC-23:** Regulate new development to minimize stormwater runoff rates and volumes generated b impervious surfaces, and maximize recharge of local groundwater aquifers when feasible. Utilize the recommendations provided in the Bay Area Stormwater Management Agency's Start at the Source Design Guidance Manual for Stormwater Quality Protection.
- **ERC-24:** Require that new development incorporate features into site drainage plans that reduce impermeable surface area and surface runoff volumes. Such features may include:
    - 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-1:** Regulate development, including remodeling or structural rehabilitation, to assure adequate mitigation of safety hazards on sites having a history or threat of slope instability, erosion, subsidence, seismic dangers (including those resulting from liquefactions, ground failure, ground rupture), flooding, and/or fire hazards.
- **HS-2:** Review and revise the City's Building Code, Zoning Ordinance, and Subdivision requirements to safeguard against seismic, geologic, and safety hazards. Mitigation should include:
    - Minimal grading and removal of natural vegetation to prevent erosion and slope instability. Cleared slopes should be replanted with vegetation.
    - Proper drainage control to prevent erosion of the site and affected properties.
    - Careful siting and structural engineering in unstable areas.
    - Consideration of flooding and fire hazards in siting and designing new development.
- **HS-4:** Prevent soil erosion by retaining and replanting vegetation, and by siting development to minimize grading and land form alteration.
- **HS-5:** Require preparation of a drainage and erosion control plan for land alteration and vegetation removal on sites greater than 10,000 sq. ft. in size.
- **HS-13:** With cooperation from the San Mateo County Flood Control District, continue maintenance, early warning, and clean-up activities for storm drains throughout San Bruno. Upgrade or replace storm drains where needed to reduce potential flooding, particularly in the neighborhoods east of El Camino Real.
- **HS-14:** Coordinate with the Federal Emergency Management Agency (FEMA) to ensure appropriate designation and mapping of floodplains.
- **HS-15:** Actively engage the San Mateo County Flood Control District to address long-term solutions to potential flood hazards; solutions advocated will include but are not limited to: greater pumping capacity, deeper flow channels, or detention ponds.
- **HS-16:** Design and engineer new or redevelopment projects in potential flood hazard areas (e.g., Belle Air Park) to withstand known flood risk.

- **HS-17:** Require upgrade of the City's storm drain infrastructure proportionate with new development's fair share of demand. Require that stormwater management capacity and infrastructure are in place prior to occupancy of new development.
- **HS-18:** Require developers to implement erosion and sedimentation control measures to maintain an operational drainage system, preserve drainage capacity, and protect water quality.
- **HS-22:** Require that construction-related grading and other activities comply with the Association of Bay Area Governments' (ABAG) Manual of Standards for Erosion and Sediment Control Measures and with the California Stormwater Quality Association (CASQA), Stormwater Best Management Practice Handbook for Construction.
- **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.

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

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

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

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

Per Subsection 12.16.030, "Grading progress and inspection," swales or ditches on terraces shall have a minimum gradient of 3 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.

San Bruno Green Infrastructure Plan

The San Bruno Green Infrastructure Plan, adopted in 2019, aims to enhance the City's stormwater management and reduce pollution. The plan focuses on integrating green infrastructure solutions, such as permeable pavements, rain gardens, and bioswales, to manage stormwater runoff more effectively. These measures help to filter pollutants, reduce flooding, and improve water quality, contributing to a more sustainable and resilient urban environment.

Transit Corridors Plan

Various policies in the Transit Corridors Plan (TCP) have been adopted for the purpose of avoiding or mitigating hydrology and water quality impacts resulting from planned development within the TCP area. The TCP area includes the Huntington Avenue right-of-way, which receives stormwater flows from a portion of the project site. Relevant policies from the TCP include:

- **A13-1:** Ensure that all projects comply with the Municipal Regional Stormwater Permit as required by the National Pollutant Discharge Elimination System (NPDES) program.
- **A13-2:** Encourage Low Impact Development (LID) techniques to infiltrate, store, detain, evapotranspire, and/or biotreat stormwater runoff close to its source.
- **A13-3:** Minimize impervious surfaces such as concrete, asphalt and hardscaping, especially for surface parking lots. Utilize permeable joint pavers, porous concrete and asphalt, reinforced grass pavement (turfcrete), cobblestone block.
- **A13-5:** Include project features to reduce pollution at its source including covered trash, recycling, and loading facilities.
- **A13-6:** Utilize landscaping that minimizes irrigation and runoff, promotes surface infiltration where possible, minimizes the use of pesticides and fertilizers, and incorporates appropriate sustainable landscaping practices.
- **A13-7:** Ensure adequate tree canopies in the front setbacks of private development and in parking lots, greenways, parks, and plazas to slow and reduce the amount of rainfall that falls to the ground.

- **A13-8:** Encourage the use of green roofs and water collection devices, such as cisterns and rain barrels, to capture water from the building for re-use.
- **A13-9:** Consider incorporating water collection devices, detention areas, and drain spouts into architectural features, water features, or artwork.
- **A13-10:** Incorporate any required stormwater treatment measures early in the site planning process to ensure that they will be effective and attractive.
- **A15-4:** Encourage planting strips along the street edges that are designed to act as functional stormwater management systems in the form of "urban bioswales." Stormwater is directed into the planter strips to irrigate landscaping while filtering and reducing stormwater runoff.
- **A6-2:** Install naturally drained, landscaped stormwater planters where possible, including on sidewalks, medians, bulbouts, parks and plazas, and traffic circles.
- **A6-3:** Encourage the use of permeable pavers around tree wells instead of impervious materials to increase infiltration of stormwater runoff.

3.8.1.2 Environmental Setting

Regional Setting

Surface Water

Six watersheds drain the City of San Bruno, with the primary drainage basins being Crystal Springs Creek, Huntington Creek, and San Bruno Creek encompassing 80 percent of San Bruno's land area. Several smaller watersheds are present in the eastern portion of the City, which reflect the pattern of existing storm drains. The watersheds flow west to east, with riparian woodlands in the upper reaches and willow riparian habitat in the lower, slower-moving reaches. The northern portion of San Bruno drains toward South San Francisco into the Colma Creek Watershed. The discharge point for the primary watersheds is the San Bruno Channel located in the vicinity of the South San Francisco-San Bruno Water Quality Control Plant just north of the San Francisco International Airport. Ultimately, all the watersheds drain to the Lower San Francisco Bay.

The project site is in the Colma Creek Watershed within the larger San Mateo Creek-Frontal San Francisco Bay Estuaries Watershed. The Colma Creek Watershed encompasses approximately 15.7 square miles. Watersheds in the City contain mostly urbanized land, sloping toward the north or east. Colma Creek is 59.7 miles long, with 49.9 miles of underground culverts or storm drains and 7.1 miles of engineered channel, leaving only 2.7 miles of unmodified channel (SMCWPPP 2007).

The highly modified, intermittent channels of the City's drainage basins are part of the storm drain system. San Bruno's storm drain system conveys water into San Francisco Bay. The system is a series of pipes, trenches, culverts, detention basins, and open channels based on the natural drainage pattern and topography. Due to steep slopes in the western portion of San Bruno and the more gradual eastward slope east of Interstate(I-) 280, a gravity-flow system is used. Water is primarily carried along a course that was formerly San Bruno Creek.

Groundwater

The project site is in the Westside Groundwater Basin or Westside Basin. The Westside Groundwater Basin covers an area of approximately 25,400 acres. It is bound to the north by the Lobos Groundwater Basin, the San Bruno Mountains and San Francisco Bay to the east, high bedrock separates the basin from the San Mateo Plain Subbasin to the south, and the San Andreas Fault and Pacific Ocean bound the basin to the west. The basin opens to the Pacific Ocean on the northwest and San Francisco Bay on the southeast (DWR 2006).

Recharge in the Westside Groundwater Basin include infiltration of rainfall and irrigation water, and leakage from water and sewer pipes. The period of 1987 to 1992 showed declining water levels, likely the result of a concurrent drought during this period (DWR 2006). However, recent groundwater monitoring indicated that increased or stable water levels were observed in shallow, primary production, and deep aquifers throughout the Westside Basin. Increased aquifer storage was also observed (SFPUC 2020). Groundwater used for water supply within the Westside Groundwater Basin is generally pumped from the Merced and Colma formations (DWR 2006).

The Westside Groundwater Basin is subdivided for management purposes into northern and southern portions, separated by the San Francisco and San Mateo County lines. The county-line boundary between the North Westside Basin and the South Westside Basin serves as a jurisdictional distribution of groundwater pumping and does not have hydrogeological significance. No geologic features restricts groundwater flow between the northern and southern parts of the basin (SFPUC 2021). The Westside Groundwater Basin is not adjudicated, and DWR determined that the Westside Groundwater Basin is not in overdraft and is a low-priority basin.

Water Quality

The Basin Plan specifies beneficial uses that apply to water bodies with potential to be affected by the project, as shown in Table 3.8-1 (SFBRWQCB 2024).

Table 3.8-1. Beneficial Uses for Surface Waters with Potential to be Affected by the Project

Water Body	Designated Beneficial Uses
Colma Creek	WARM, WILD, REC-1, REC-2
Lower San Francico Bay	IND; COMM; SHELL; EST; MIGR; RARE; SPAWN; WILD; REC-1; REC-2; NAV

Source: SFBRWQCB 2024.
Key:

COMM: Commercial And Sport Fishing	EST: Estuarine Habitat
IND: Industrial Service Supply	MIGR: Fish Migration
NAV: Navigation	RARE: Preservation of Rare and Endangered Species
REC-1: Water Contact Recreation	REC-2: Noncontact Water Recreation
SHELL: Shellfish Harvesting	SPWN: Fish Spawning
WARM: Warm Freshwater Habitat	WILD: Wildlife Habitat

The 303(d)-listed impairments in the project area are shown in Table 3.8-2 and are based on the 2024 California Integrated Report (State Water Board 2024).

Table 3.8-2. Water Quality Impairments within the Project Area

Water Body	Listed Impairment	Potential Sources	EPA TMDL Report Completion
Colma Creek	Trash	Unknown	Est. 2029
Lower San Francico Bay	PCBs (including dioxin-like)	Unknown	03/29/2010
	Chlordane	Unknown	Est. 2037
	Dieldrin	Unknown	Est. 2037
	DDT	Unknown	Est. 2037
	Dioxin compounds (including 2,3,7,8-TCDD)	Unknown	Est. 2037
	Invasive Species	Unknown	Est. 2037
	Furan Compounds	Unknown	Est. 2037
	Trash	Unknown	Est. 2037
	Mercury	Unknown	02/12/2008

Source: State Water Board 2024.
Key:
EPA = U.S. Environmental Protection Agency
Est. = estimated completion date
PCBs = Polychlorinated biphenyls
TMDL = total maximum daily load
DDT = Dichlorodiphenyltrichloroethane

The Lower San Francisco Bay is designated as impaired for mercury. Fish tissue collected from San Francisco Bay often contains relatively high mercury concentrations. Sources of mercury include runoff from historic mines, urban runoff, wastewater discharges, atmospheric deposition, and resuspension of historic deposits of mercury-laden sediment already in San Francisco Bay. Most of the historic mercury deposits date back to the California Gold Rush of the 1800s, when mercury was mined throughout the Coastal Range and used in the Sierra Nevada to extract gold. The largest source of mercury is the Central Valley, where rivers carry mercury from remote regions to San Francisco Bay. EPA approved a Basin Plan amendment incorporating a TMDL for mercury in San Francisco Bay and an implementation plan to achieve the TMDL and became effective on November 7, 2007.

Colma Creek and Lower San Francisco Bay are also designated as impaired for trash. Provision C.10 of the San Francisco Bay MRP contains requirements for trash load reductions. Trash load reduction control actions must be implemented to meet the goal of 100 percent trash load reduction or no adverse impact on receiving waters from trash by July 1, 2022. Trash is considered a threat to aquatic life, which relates to impairment of beneficial uses, including Noncontact Water Recreation (REC-2), as designated for both Colma Creek and Lower San Francisco Bay (Table 3.8-1).

Groundwater

Most dissolved constituents in groundwater meet EPA guidelines; however, nitrate-nitrogen concentrations in the groundwater commonly exceed the primary maximum contaminant level. In addition, natural sources of total dissolved solids to groundwater in the San Francisco Bay, including the Westside Groundwater Basin, include saltwater intrusion from the Bay, as well as interaction between recharge water and aquifer materials derived from marine or estuarine sediments. Two areas monitored for seawater intrusion, the Pacific Coast and the Bay Coast, contain several monitoring wells in various aquifers in the Westside Basin known as the coastal and bay side monitoring networks, respectively. Groundwater is monitored as part of a semiannual monitoring program. Existing beneficial uses of the Westside Groundwater Basin include municipal and domestic water supply, industrial process water supply, and industrial service water supply; and potential beneficial uses include agricultural water supply.

Flooding

There are three active flood control zones in the San Mateo County Flood Control District: Colma Creek, San Bruno Creek, and San Francisquito Creek. Both Colma and San Bruno Creek zones contain parts of the City of San Bruno. As shown in Figure 3.8-1, the City of San Bruno contains areas designated by FEMA as 100-year floodplains to the east and north of the project site; however, the project site is not within the floodplain. The City has also identified several areas that occasionally flood due to combined high tides and heavy rain. The City's storm drain system does not operate effectively at times of high tide combined with heavy rain. Inadequate storm drains and low elevation, which subjects the areas to tidal influences, results in flooding.

Project Site

Surface Water

The project site encompasses 44 acres generally bounded by Sneath Lane to the north, Huntington Avenue to the east, I-380 to the south, and El Camino Real (State Route 82) to the west. The project site also includes a vacant parcel north of Sneath Lane between Huntington Avenue and Maple Street. Approximately 96 percent of the total surface area of the project site consists of impervious surfaces. Impervious surfaces on the project site include buildings for retail uses, parking structures, and surface parking. Limited landscaped areas are present in the surface parking areas located on the project site. The land surface elevation of the main site is the greatest on the western side of the project site (approximately 66 feet) and decreases across the project site, with the lowest elevation (approximately 36.5 feet) on the eastern side of the site. The north parcel is an asphalt-paved parking lot that slopes gradually from an elevation of 45.5 feet on the west side to 38.5 feet on the east side (Langan Engineering 2022). Colma Creek and Lower San Francisco Bay are less than 1 mile northeast and 2 miles east of the project site, respectively.

The existing storm drain network on the project site includes four connections to the San Bruno storm drain system. Three relatively minor connections are located along Sneath Lane, and one major connection is located through the Bay Area Rapid Transit (BART) parcel to Huntington Avenue (Appendix 3.8-1). A 36-inch storm drain is located on the northern portion of the project site on Sneath Lane and an existing 48-inch City storm drain is located on the eastern boundary of the project site on Huntington Avenue.

Groundwater

The project site is within the Westside Groundwater Basin. Groundwater measurements taken during preliminary site investigations were measured during a drought, and groundwater levels varied around the site. At the main site, groundwater was encountered between about 12 and 39 feet below ground surface (bgs). Depth to water is deeper in the western and southern portions of the project site and shallower in the north. Monitoring wells in the vicinity of the main site indicated high groundwater levels encountered between 5.5 and 24.1 feet bgs. At the north parcel, groundwater was encountered at 13.3 feet bgs. Monitoring well data in the vicinity of the north parcel indicated high groundwater was encountered at depths between 8.0 and 8.3 feet bgs. The design groundwater elevations appropriate for preliminary project design range from elevation 33 to 39 feet. It is anticipated that groundwater levels would vary seasonally (Langan Engineering 2022).

Water Quality

Water quality in a typical surface water body is influenced by processes and activities that take place within the watershed. The quality of the stormwater runoff from the project site and surrounding development is typical of urban watersheds where water quality is affected primarily by discharges from both point and nonpoint sources. Point-source discharges are discharges that one can point to as known sources of pollutants, while nonpoint-source discharges generally result from diffuse sources, such as land runoff, precipitation, or seepage. Point and nonpoint sources include outfalls, winter storms, overland flow, exposed soil, roofs, parking lots, and streets. Water quality in the vicinity of the project site is directly affected by stormwater runoff from adjacent streets and properties that deliver fertilizers, pesticides, automobile and traffic pollutants (e.g., oil, grease, metals), sediment with associated pollutants from soil erosion, trash, and other pollutants. Beneficial uses and water quality impairments that apply to water bodies with the potential to be affected by the project site are discussed in the *Regional Setting* section.

Multiple site-specific Phase I Environmental Site Assessment (ESA) investigations have been prepared for the project site. The technical reports further describing these investigations are included in Appendix 3.7-1, *Phase I Environmental Site Assessments*, and discussed in detail in Section 3.7, *Hazards and Hazardous Materials*, of this EIR. As shown in Figure 3.8-1, the Phase I ESAs identified one recognized environmental condition (REC) in connection with a leaking underground storage tank (LUST) site at 1150 and 1178 El Camino Real. It was associated with the presence of petroleum hydrocarbons and benzene above regulatory screening criteria in onsite groundwater (associated with historical underground storage tank [UST] releases onsite). The Sears Automotive Center/Sears #1478 site at 1178 El Camino Real has an *Open - Eligible for Closure* status and is undergoing closure under the State Water Board's Low Threat Closure Policy. An unknown amount of hydrocarbon-affected soil and groundwater remain onsite. Groundwater monitoring reports for the site indicate two total petroleum hydrocarbon (TPH)-Gasoline plumes onsite, one with concentrations exceeding 100 micrograms per liter (µg/L) and the other exceeding 1,000 µg/L. If

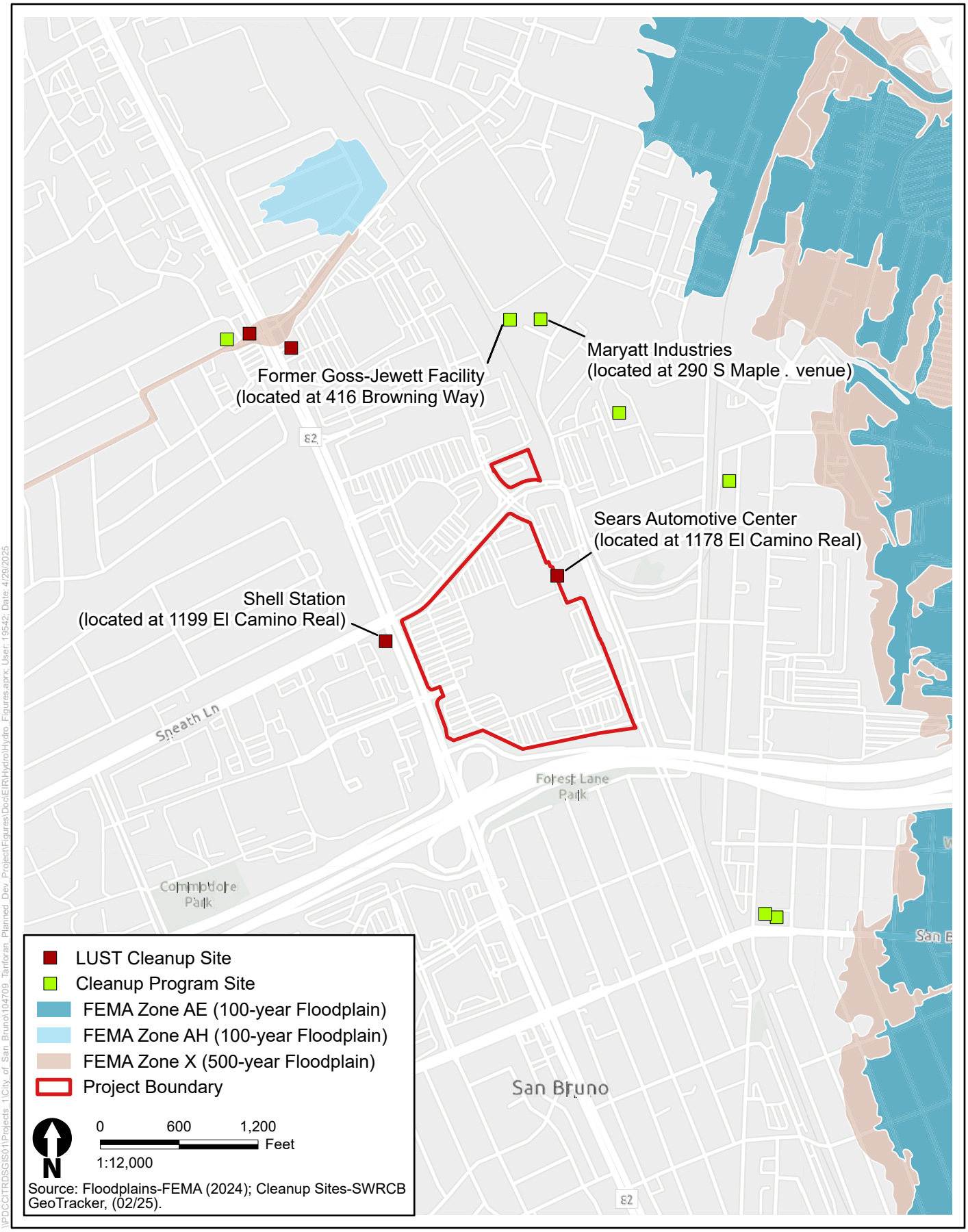

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Figure 3.8-1
FEMA Flood ones within the Project` Area

excavation or redevelopment is to occur onsite, the San Mateo County Environmental Health Division would require notification. Other closed LUST sites associated with current or formerly contaminated sites are also located near the project site. Former onsite USTs (without available closure documentation) were also listed for the 1122 El Camino Real site. However, no release, suspected release, or potential material threat of a release was identified associated with the former USTs.

Potentially contaminated sites are also in the vicinity and outside of the project site. The Former Goss-Jewett Facility at 416 Browning Way has contaminants of concern including tetrachloroethylene. Impacts are on soil, soil vapor, and groundwater. Goss-Jewett operated a dry-cleaning supply distribution business onsite from 1957–2000. Groundwater flow from the Former "Goss-Jewett Facility" site is to the northeast, away from the project site. Similarly, the Maryatt Industries site located at 290 S Maple Avenue also has contaminants of concern including tetrachloroethylene, with impacts on soil, soil vapor, and groundwater. The site was developed in 1958 and operated a commercial laundry and dry-cleaning business until 1992. Contamination on the Maryatt Industries site appears to be connected to a release at 416 Browning Way. Groundwater flow for both of these sites is to the north/northeast, away from the project site. All other sites with LUSTs in the project site and vicinity are listed as closed. Refer to Section 3.7, *Hazards and Hazardous Materials*, for further discussion of prior environmental investigations and site conditions.

Flooding

As shown in Figure 3.8-1, the project site is outside of the 100-year floodplain, within FEMA Zone X (unshaded). FEMA Zone X (unshaded) is an area of minimal flood hazard, usually depicted on FIRMs as above the 500-year flood level (FEMA 2019).

3.8.2 Environmental Impacts

This section describes the environmental impacts of the project on hydrology. It describes thresholds used to determine whether an impact would be significant and the methods used to evaluate the impacts. Measures to mitigate significant impacts are provided, where appropriate.

3.8.2.1 Thresholds of Significance

In accordance with Appendix G of the California Environmental Quality Act (CEQA) Guidelines, the project would have the potential to have a significant effect on hydrology if it would result in any of the following conditions.

- Violation of any water quality standards or waste discharge requirements or other substantial degradation of surface or ground water quality;
- Substantial decrease in groundwater supplies or substantial interference with groundwater recharge such that the project may impede sustainable groundwater management of the basin;
- Substantial alteration of 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 that would:

(i) result in substantial erosion or siltation onsite or offsite.

(ii) substantially increase the rate or amount of surface runoff in a manner that would result in flooding onsite or offsite.

(iii) 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

(iv) impede or redirect flood flows.

- In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation; or
- Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

3.8.2.2 Methodology and Approach

Project impacts were analyzed by comparing baseline conditions, as described in Section 3.8.1.2, *Environmental Setting*, to conditions during construction and/or operations of the project. The analysis focuses on issues related to surface hydrology, groundwater supply, surface and groundwater quality, and flood hazards. The key construction-related impacts were identified and evaluated qualitatively based on the physical characteristics of the project and the magnitude, intensity, location, and duration of activities.

- **Surface water hydrology.** The surface water hydrology impact analysis considered changes in water bodies, impervious surfaces, and drainage patterns. Information on the change in impervious surface, runoff quantities, and drainage patterns was provided by Appendix 3.8-1, *Storm Drain System Capacity Study*. The analysis of changes of on-site water bodies involved a comparison of existing on-site hydrological conditions and new/modified conditions proposed as part of the project.
- **Groundwater hydrology.** Potential impacts on groundwater supply were analyzed using information from publicly available publications and site-specific technical reports, including the preliminary geotechnical investigation (Langan Engineering 2022) and the *Groundwater Assessment for Redevelopment of the Tanforan Shopping Center City of San Bruno* (Appendix 3.8-3). The potential for project actions, including construction dewatering and potentially affecting water level drawdown, was evaluated.
- **Surface and groundwater quality.** Impacts of the project on surface water and groundwater quality were analyzed using information on potential existing sources of pollution generated by activities, such as vehicle use and parking, building maintenance, pesticide use, trash, and material storage and site-specific reports, including the stormwater (C.3) checklists. Additional information on hazardous materials with potential to affect the project is provided in Section 3.7, *Hazards and Hazardous Materials*, of this EIR. These impacts were then compared to potential project-related sources of pollution during project construction, such as sediments and other construction materials, and during project operation, such as vehicle use, building maintenance, pesticide use, trash, and storage of hazardous materials.
- **Flood hazards.** The impact analysis for flood risk was conducted using FEMA mapping to determine the existing flood zone and information regarding changes in the drainage system and layout that may affect flood risk.

3.8.2.3 Buildout Scenario Evaluated

As discussed in Section 3.0.3.1, *Buildout Scenarios*, for each resource area studied, the EIR evaluates the scenario with the greatest potential to result in a significant impact. In some cases, impacts would be the same regardless of the buildout scenario, so the analysis does not evaluate a specific buildout scenario. This approach ensures that the EIR identifies the maximum potential impacts of the project based on reasonably foreseeable development outcomes. Table 3.8-3 summarizes the approach used for each impact analysis related to hydrology and water quality.

Table 3.8-3. Impact Analysis Approach for Hydrology and Water Quality

Impact Criteria	Scenario A	Scenario B	EIR Approach
Impact HWQ-1: Violation of any water quality standards or waste discharge requirements or other substantial degradation of surface or ground water quality?	Scenario A has more Life Science Lab & Office use.	Scenario B has more residential use.	Scenario B. Both scenarios involve similar demolition, construction activities, and areas of disturbance; therefore, the approach for addressing disturbance area during construction is the same under both scenarios. The post-project impervious surface would be greater under Scenario B and could result in more polluted stormwater runoff. Therefore, the operational analysis evaluates Scenario B.
Impact HWQ-2: Substantial decrease in groundwater supplies or substantial interference with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	Scenario A has more Life Science Lab & Office use.	Scenario B has more residential use.	Both Scenarios. While both scenarios involve similar excavation depths, based on modeling conducted for the project (see Impact HWQ-2), Scenario A would require more construction dewatering. Therefore, the construction analysis evaluates Scenario A. The post-project impervious surface would be greater under Scenario B and could result in reduced groundwater recharge. In addition, Scenario B would result in a greater water demand, and the City sources a portion of its water supply from groundwater. Therefore, the operational analysis evaluates Scenario B.
Impact HWQ-3: Substantial alteration of 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 that would: (i) result in substantial erosion or siltation onsite or offsite. (ii) substantially increase the rate or amount of surface runoff in a manner that would result in	Scenario A has more Life Science Lab & Office use.	Scenario B has more residential use.	Scenario B. Both scenarios involve similar demolition, construction activities, and areas of disturbance; therefore, the approach for addressing disturbance area during construction is the same under both scenarios. The post-project impervious surface would be greater under Scenario B and could result in more polluted stormwater runoff. Therefore, the operational analysis evaluates Scenario B.

Impact Criteria	Scenario A	Scenario B	EIR Approach
flooding onsite or offsite. (iii) 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 (iv) impede or redirect flood flows.			
Impact HWQ-4: In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	Scenario A has more Life Science Lab & Office use.	Scenario B has more residential use.	Same for both scenarios. The project area and general project characteristics are the same under both scenarios; therefore, the analysis approach is not based on one scenario or the other and accounts for any future development that could occur under the project. Both scenarios are within the same project area, outside of the 100-year flood zone, tsunami inundation area, and not prone to seiches.
Impact HWQ-5: Conflict with or obstructed implementation of a water quality control plan or sustainable groundwater management plan?	Scenario A has more Life Science Lab & Office use.	Scenario B has more residential use.	Scenario A. While both scenarios involve similar excavation depths, based on modeling conducted for the project (see Impact HWQ-2), Scenario A would require more construction dewatering. Therefore, the construction analysis evaluates Scenario A.

3.8.2.4 Impacts Not Evaluated in Detail

The project would not risk release of pollutants due to project inundation in a flood hazard, tsunami, or seiche zone.

The project site is not within a planned tsunami inundation area as depicted on the Tsunami Inundation Map for Emergency Planning prepared by the California Emergency Management Agency and California Geological Survey. Therefore, the project is not subject to inundation by a tsunami. There are no reservoirs adjacent to the project site; therefore, the project would not be prone to inundation by a seiche. The City of San Bruno contains areas designated as FEMA 100-year floodplain to the east and north of the project site; however, the project site is not within the 100-year floodplain. Therefore, the project site would not be subject to inundation by a flood.

During construction activities, stormwater BMPs would be implemented, as required by federal, county, and local policies to minimize degradation of water quality associated with stormwater runoff or construction-related pollutants. In addition, construction and maintenance activities would comply with local stormwater ordinances, stormwater requirements established by the county's MS4 requirements, and regional waste discharge requirements. Other measures in the SWPPP would include a range of stormwater control BMPs (e.g., installing silt fences, staked straw wattles, or geofabric to prevent silt runoff to storm drains or waterways). Operation would comply with the County Stormwater Management and Discharge Control Ordinance, stormwater

requirements established by the county's MS4 requirements, and regional waste discharge requirements. Additional discussions and measures to reduce the risk of pollutants and flood flows are discussed under Impact HWQ-1 and Impact HWQ-3. Therefore, there would be no impact related to a risk release of pollutants due to project inundation in a flood hazard, tsunami, or seiche zone. This impact is not evaluated further.

3.8.2.5 Impacts and Mitigation Measures

Impact HWQ-1: The project would not result in the violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality (Less Than Significant with Mitigation).

Construction

Surface Water

Project construction activities such as grading, stockpiling of spoil materials, and other construction-related earth-disturbing activities could result in short-term water quality impacts associated with soil erosion and subsequent sediment transport to adjacent properties, roadways, or watercourses via storm drains. Sediment transport to local drainage facilities such as drainage inlets, culverts, and storm drains could result in reduced storm flow capacity, resulting in localized ponding or flooding during storm events. Construction activities could also generate dust, settlement, litter, oil and other pollutants that could temporarily contaminate water runoff from the project site.

Construction activities must comply with the NPDES Construction General Permit, the MRP, and City's municipal code, which contain standards to ensure that water quality is not degraded. As part of the Construction General Permit, standard erosion control measures and BMPs would be identified in a SWPPP and would be implemented during construction to reduce sedimentation of waterways and loss of topsoil. The SWPPP is required to be submitted before a grading permit is issued by the City of San Bruno. Compliance with the City's grading permit and the Construction General Permit would require use of BMPs to restrict soil erosion and sedimentation and restrict non-stormwater discharges from the construction site as well as release of hazardous materials. As a performance standard, BMPs to be selected would represent the best available technology that is economically achievable and best conventional pollutant control technology to reduce pollutants.

Other potential water quality impacts include chemical spills into storm drains or groundwater aquifers if proper minimization measures are not implemented. However, required BMPs would be implemented to reduce pollutants in stormwater and other nonpoint-source runoff. Measures range from source control to treatment of polluted runoff. BMPs can include watering active construction areas to control dust generation during earthmoving activities; using water sweepers to sweep streets and haul routes; and installing erosion control measures (such as silt fences, staked straw bales/wattles, silt/sediment basins and traps, check dams, geofabric, and sandbag dikes) to prevent silt runoff to public roadways, storm drains, or waterways. During construction, site control BMPs would be implemented to minimize erosion, sediment, and runoff, as required by the San Francisco Bay MRP. As appropriate, disturbed soil would be revegetated as soon as possible with the appropriate selection and schedule of plants.

Both scenarios would result in a total area of disturbance of 38.7 acres. No disturbed surfaces would be left without erosion control measures in place during the rainy season, which generally occurs between October 15 and April 15. In addition to compliance with the Construction General Permit, the project would also be required to comply with local stormwater and construction site runoff ordinances. These requirements involve development and implementation of an erosion control plan specific to the construction site to minimize water quality impacts. No surface water features are within the project area; therefore, construction would not involve dredge and fill activities.

The project would be required to comply with the San Francisco Bay MRP requirements and the NPDES Construction General Permit. Post-construction measures must also meet SWPPP requirements. Further, a stormwater control plan is required for the development. Compliance with these requirements would ensure that construction activities do not result in a violation of water quality standards or waste discharges requirements, or otherwise result in water quality degradation. However, as discussed below, discharge of potentially contaminated dewatered groundwater could make its way into surface waters, which would affect surface water quality. Implementation of **Mitigation Measure HWQ-1** would reduce this impact.

With implementation of **Mitigation Measure HWQ-1**, construction of the project would not result in the violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface water quality. Potential impacts on water quality from construction activities associated with the project would be ***less than significant with mitigation***.

Groundwater

As discussed in Section 3.8.2, *Existing Conditions*, multiple site-specific Phase I ESA investigations were prepared for the project site. The Phase I ESA associated with the 1150 and 1178 El Camino Real sites concluded that historical UST releases resulted in petroleum hydrocarbons and benzene concentrations above regulatory screening criteria in onsite groundwater. The Sears Automotive Center site at 1178 El Camino Real was identified as a LUST site within the project footprint with an *Open - Eligible for Closure* status. As previously noted, an unknown amount of hydrocarbon-affected soil and groundwater remains onsite and could expose construction personnel and the surrounding environment to affected media. As a result, the potential for contaminated onsite groundwater exists in the project site. Construction dewatering could result in the exposure of pollutants from prior spills or other activities, could potentially alter gradients or flow directions beneath contaminated sites, and may contaminate surface water or groundwater. As discussed in Section 3.8.2, *Existing Conditions*, two TPH-Gasoline plumes are on Sears Automotive Center site. These plumes are co-located within the building footprint for RESI 2, which is not anticipated to require dewatering, and adjacent to RESI 1, which is anticipated to require dewatering (Appendix 3.8-2, *Groundwater Assessment*). Therefore, groundwater quality monitoring during dewatering would be required prior to disposal, as well as water quality testing prior to disposal to ensure there are no impacts on surface water quality.

As further discussed under Impact HWQ-2, generally, impacts on groundwater levels would be relatively minor (less than 1 foot of drawdown) at the known potentially contaminated sites. Construction dewatering would not likely mobilize contaminants associated with LUST sites or most formerly contaminated sites located near the project site. However, sites that exhibit the most drawdown are the Shell Station and the Sears Automotive Center, both of which occur on or immediately adjacent to the project site and have known groundwater contamination. Construction dewatering may encounter petroleum-impacted groundwater. Depending on the actual site

conditions encountered and associated groundwater extraction rates and durations, the actual drawdown and migration of groundwater at contaminated sites could vary from projections. Although these sites have received closure, residual impacts on groundwater may remain. Based on excavation footprints and proximity to groundwater impacts at the Sears Automotive Center and Shell Station, petroleum impacts could be encountered during excavation and dewatering. Construction dewatering plans will likely need to be reviewed by the San Mateo County Pollution Prevention Program to determine impacts on water quality, as well as any waste discharge requirements during dewatering (Appendix 3.8-2, *Groundwater Assessment*).

Although small amounts of construction-related dewatering are covered under the Construction General Permit, the San Francisco Bay Regional Water Quality Control Board (SFBRWQCB) has regulations specific to dewatering activities that typically involve reporting and monitoring requirements. In the event of dewatering during construction activities or before dewatering to surface water via a storm drain, the contractor would obtain coverage under the NPDES Construction General Permit from SFBRWQCB. Coverage under the Construction General Permit typically includes dewatering activities as authorized non-stormwater discharges, provided that dischargers prove the quality of water to be adequate and not likely to affect beneficial uses. All requirements of dewatering would be met to ensure water quality is not affected.

If petroleum hydrocarbons or volatile organic compounds (VOCs) (including benzene) are not detected in dewatering water, as noted above, a Construction General Permit for Stormwater will be obtained from the State Water Board prior to discharge of dewatering water to the storm drain. Depending on the risk level determination for each phase of construction, monitoring and reporting of various water quality parameters, including pH and turbidity, may be required.

There are dewatering permit requirements in addition to those outlined in the Construction General Permit, including discharge sampling and reporting, and the SFBRWQCB's Fuel and VOC General Permit (Order No. R2-2017-0048) if contaminated groundwater is encountered. In the event groundwater is encountered during construction, dewatering discharge methods would include options for discharge to surface water via a storm drain in compliance with waste discharge requirements to ensure that any discharges would be within the capacity of existing facilities and would not require the construction or expansion of existing facilities. WDRs also include regulations specific to dewatering activity requirements. If it is found that the groundwater does not meet water quality standards, it must either be treated as necessary prior to discharge so that all applicable water quality objectives (as designated in the Basin Plan) are met or hauled offsite instead for treatment and disposal at an appropriate waste treatment facility that is permitted to receive such water. For water to be discharged into the Bay, the contractor would be required to notify SFBRWQCB and comply with the board's requirements related to the quality of water and discharges.

If petroleum hydrocarbons or VOCs are detected in dewatering water, a Fuel and VOC General Permit must be obtained by the SFBRWQCB prior to discharge of dewatering water to the storm drain. As required by the permit, dewatering water must be fully characterized for a suite of contaminants of potential concern, after which treatment needs must be assessed and designed prior to permit approval. The Fuel and VOC General Permit also requires ongoing water quality monitoring, reporting, and payment of an annual fee.

The project would comply with SFBRWQCB dewatering requirements to prevent potential water quality impacts on surface waters or ensure proper treatment measures are implemented prior to discharge. However, potential water quality impacts may be encountered or incurred during construction dewatering. Even minimal and short-term drawdown associated with construction dewatering may affect the migration of affected groundwater. Implementation of **Mitigation Measure HWQ-1** would reduce this impact.

With implementation of **Mitigation Measure HWQ-1**, construction of the project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. Construction-related impacts associated with the project would be ***less than significant with mitigation***.

Operation

As shown in Table 3.8-4, the project would result in an estimated 0.8 acre (approximately 30 percent) increase in pervious surface, for both Scenario A and Scenario B on the project site. However, Scenario B would result in approximately 1,000 square feet more impervious cover than Scenario A.

Table 3.8-4. Impervious Area of the Project

	Existing Impervious	Existing Pervious	Proposed Impervious	Proposed Pervious	Total (square feet)
Scenario A					
Area (square feet)	1,796,059	119,885	1,758,683	157,261	1,915,944
Area (acres)	41.2	2.8	40.4	3.6	44.0
Percent	*93.7*	*6.3*	*91.8*	*8.2*	*100*
Scenario B					
Area (square feet)	1,796,059	119,885	1,759,773	156,171	1,915,944
Area (acres)	41.2	2.8	40.4	3.6	44.0
Percent	*93.7*	*6.3*	*91.8*	*8.2*	*100*

Source: BKF Engineers 2025.

The project would be required to comply with the MRP SMCWPPP C.3 Stormwater Technical Guidance because it would involve new or replaced impervious area greater than 10,000 square feet. The Provision C.3 of the MRP requires that new development mitigate impacts on water quality by incorporating LID measures including site design, pollutant source control, stormwater treatment and flow control measures. LID treatment measures include “capture and reuse” or rainwater harvesting, infiltration, and bioretention areas. Stormwater would be treated per San Mateo County C.3 requirements, prior to discharge to the storm drain system.

The stormwater management measures proposed for the project would reduce pollutant discharges from stormwater through filtration and infiltration. Provision C.3 also states, however, that “all projects, regardless of size, should consider incorporating appropriate source control and site design measures that minimize stormwater pollutant discharges to the maximum extent practicable.” Regardless of a project’s need to comply with Provision C.3, the “maximum extent practicable” standard would be applied, including standard stormwater conditions of approval.

Both Scenario A and Scenario B would include nine bioretention areas. Each bioretention area would be lined with an underdrain and would be sized based on the flow-based sizing criteria. Portions of the project site would also be landscaped. Landscape design would minimize stormwater runoff and promote surface filtration. For compliance with the MRP (Provision C.3.j), the City has adopted a Green Infrastructure Plan (GI Plan). The plan addresses long-term measures for the inclusion of vegetated or green landscape into public rights-of-way and public properties in addition to private developments. The MRP requires green landscape on public and private properties to capture stormwater from paved surfaces such as roads, parking lots and other areas where stormwater collects pollutants, which would otherwise be conveyed to San Francisco Bay. Green infrastructure also reduces runoff rates and volumes and allows infiltration of stormwater for groundwater recharge. LID treatment methods and compliance with the Green Infrastructure Plan guidelines and other stormwater management requirements would be applied to the project. Potential LID measures for the project, which are required per Provision C.3 of the MRP, include rainwater harvesting and reuse for non-potable water uses. Additionally, sustainable landscaping would be incorporated to minimize runoff, promote infiltration and reduce contamination from pesticides and fertilizers.

Implementation of the project would not violate any water quality standards or otherwise result in water quality degradation during operation because stormwater runoff from the project site would be managed according to the provisions of the San Francisco Bay MRP. All stormwater runoff would be treated using LID measures, as required, using measures such as rainwater harvesting, reuse, infiltration, and bioretention. Roof runoff would either be directed into cisterns or rain barrels and used for irrigation or other non-potable uses or directed to vegetated areas. Runoff from sidewalks, patios, and uncovered parking lots would also be directed onto vegetated areas. Vegetated areas provide stormwater treatment via infiltration and biological uptake. site design measures also include self-treatment and self-retaining areas. All stormwater conveyed to treatment facilities (bioretention areas) would be collected in a piped storm drain system prior to discharging into the public storm drain system. Incorporation of recommendations from the City's adopted Green Infrastructure Plan into the project design will ensure development in a manner consistent with the City's and regional long-term goals for pollutant reduction and reduced runoff from impervious surfaces associated with development.

To minimize trash-related pollutants from entering receiving waters, the MRP also requires compliance with Provision C.10, Trash Load Reduction. To demonstrate compliance to meet the goal of 100 percent trash load reduction or no adverse impact on receiving waters from trash, implementation of trash control measures and other actions to reduce trash loads from entering storm drain systems is also required. All new development would provide trash-capture devices on all drain inlets that connect to the municipal storm drain system, as required by the City.

The project would be designed and maintained in accordance with City, County, and SFBRWQCB water quality requirements, such as the San Francisco Bay MRP and SMCWPPP. The project would comply with the General Construction Permit, San Francisco Bay MRP, Provision C.3, and SMCWPPP C.3 Stormwater Technical Guidance, and would implement a SWPPP and other erosion control measures that incorporate stormwater treatment areas such as bioretention areas. Operation-related impacts associated with the project would be ***less than significant***.

Mitigation Measures

Mitigation Measure HWQ-1: Require Groundwater Monitoring Well Installation and Sampling Prior to Dewatering Activity.

For any proposed excavation and dewatering, the installation of monitoring wells shall be required to measure water levels and water quality, prior to and during dewatering activities, with a focus on potential constituents of concern based on permitting requirements and known or suspected water quality impacts within or near the site. The project applicant shall install groundwater monitoring wells and collect and test samples prior to dewatering activity. Wells are to be drilled as deep as the lowest finish floor elevation depth being proposed. Wells may be drilled on-site or in the public right-of-way or easement and requirements would include the following.

- The project applicant shall apply for a groundwater well permit with San Mateo County and an encroachment permit with the City of San Bruno.
- The project applicant or City (reimbursed by the project applicant) shall develop a monitoring, testing, and treatment plan for the City's review.
- The City may require the project applicant to decommission wells following construction activity.

If contamination is detected, remedial measures to limit and/or contain the spread of contaminated water shall be implemented. Several options can be employed such as conducting on-site treatment/remediation, disposal in sewer system (with any appropriate pre-treatment) or at hazardous facility depending on type and levels of contamination, tanking, or stopping or phasing underground construction. Appropriate notification, monitoring and permitting steps must be followed to mitigate any potential impacts, including coordination and contingency planning with the appropriate permitting and regulatory agencies.

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

Construction

Groundwater elevation across the project site ranges from approximately 12 and 39 feet bgs, although monitoring wells in the vicinity of the site indicated high groundwater levels encountered between 5.5 and 24.1 feet bgs. Dewatering is anticipated to be required during construction of several planned basements and subterranean parking structures in three of the four phases (Phases 1, 3, and 4) of project development. A construction dewatering analysis was conducted for the project (Appendix 3.8-2). The analysis grouped buildings by construction phase and construction activities, based on longest excavation duration. Construction dewatering includes initial dewatering required to install shorings followed by maintenance dewatering until foundations are poured. Maintenance dewatering was conservatively assumed to range from 25 to 50 percent of initial flow rates. Buildings constructed in Phase 1 under both scenarios would have the greatest potential for groundwater dewatering due to the greatest bottom of mat slab foundations compared to groundwater elevations. Construction dewatering during Phase 4 would vary by scenario. The total volume of groundwater removed is estimated to be up to 46 acre-feet under Scenario B to up to 73 AF under Scenario A. The actual dewatering rates and volumes could vary depending on actual site conditions encountered and the associated groundwater extraction rates and durations. Dewatering

would be conducted on a temporary basis during the construction phase only. Further, groundwater levels are assumed to fully recover between construction phases (Appendix 3.8-2). After dewatering activities are completed, water levels are anticipated to return to pre-construction conditions.

The maximum volume of groundwater removed during project construction would be approximately 10 acre-feet per year under Scenario A. In 2023, total groundwater extraction from the Westside Groundwater Basin was approximately 6,123 AF, slightly lower than the 10-year average of 6,246 AF between 2012 and 2021. Construction dewatering represents approximately 0.2 percent of the average annual groundwater extractions from the Westside Groundwater Basin. The volume of extraction associated with dewatering during construction is not anticipated to impede sustainable groundwater management within the basin (Appendix 3.8-2).

Dewatering during project development would likely occur within the shallow aquifer of the Merced Formation in the Westside Groundwater Basin. Public water supply wells in the project site are also screened in the same Merced Formation aquifer that would be dewatered during project development. However, water supply production wells are screened at depths much deeper than the construction dewatering depth in the deeper aquifer portion of the Merced Formation where the degree of hydraulic connection between shallow groundwater and the aquifer the production wells are screened is limited. Groundwater-level impacts would likely be negligible at nearby public supply wells, and no impacts on the public supply wells are expected (Appendix 3.8-2).

Project development would be subject to review by the San Mateo County Groundwater Protection Program and approved by inspection staff. During the construction phase, implementation of BMPs as defined in the SWPPP and as required by the NPDES Construction General Permit, would manage runoff such that construction-related impacts related to groundwater would be minimized.

Based on the analysis above, construction of the project would not substantially decrease groundwater supplies or substantially interfere with groundwater recharge such that the project may impede sustainable groundwater management of the basin. Construction-related impacts associated with the project would be ***less than significant***.

Operation

Garages and basements would be constructed to be waterproof and would not require permanent dewatering (Appendix 3.8-2). Therefore, the project would not deplete groundwater supplies due to permanent dewatering activities. The project would be served from the City's existing and future portfolio of water supplies, which includes treated surface water and local groundwater from the Westside Groundwater Basin. In 2016, the City reduced its use of groundwater in accordance with the Regional Groundwater Storage and Recovery Project (West Yost 2025).

The City of San Bruno, including the project site, is serviced by both SFPUC and local South Westside Basin groundwater resources. As a participant in the Regional Groundwater Storage and Recovery Project, the City of San Bruno participates in the storage period, which requires the agency to purchase most of its municipal water resources from surface water agencies, primarily SFPUC, during normal and wet years. However, the participation in the storage period could change upon notice from SFPUC. The Regional Groundwater Storage and Recovery Project permits participating jurisdictions to continue pumping groundwater during wet years to support well-maintenance activities and manage distribution system constraints. The City of San Bruno does pump limited groundwater resources during wet years for these allowable purposes. Purchase of water would be based on system needs, water availability, and groundwater recharge goals.

As discussed in Section 3.16, *Utilities*, of this EIR, the City provides water service to the project site. In recent years, approximately 90 percent of the City's water supply has been from the SFPUC and the North Coast County Water District. Groundwater from the Westside Basin comprises any remaining supply needs. Existing water demand at the project site is 0.07 million gallons per day (MGD). The projected potable water demand for buildout of the project would be approximately 0.45 MGD. Scenario B results in the highest buildout water demand, with a total projected demand of 0.38 MGD. The project's Water Supply Assessment concluded that the City's projected water supplies would be sufficient to meet the highest water demand development scenario of the project in normal water years. However, the City's water supplies are not adequate to meet projected demands from the project in single and multiple dry years, and supply shortfalls are expected. This shortfall is primarily due to potential significant cutbacks in the City's supply from SFPUC which may be significantly reduced in dry years due to the Bay-Delta Plan Amendment. Actions that the SFPUC is taking in response to a potential water supply shortage are expected to mitigate the water supply shortage. Further, the project would be subject to the same water conservation and water use restrictions as other City water customers. Note that without the Bay-Delta Plan Amendment, supply shortfalls would be nearly eliminated. The only anticipated supply shortage would be less than 1 percent in the fourth and fifth dry years of the 5-year dry period in 2045 (West Yost 2025). Further details on surface and groundwater supply are described in Section 3.16, *Utilities* and Service Systems, of this EIR.

As shown in Table 3.8-4, the amount of pervious area in the project site would increase upon project completion, with an increase of approximately 0.8 acre (approximately 30 percent) of pervious surfaces for both Scenario A and Scenario B. The project site (approximately 44 acres) is less than 1 percent of the Westside Groundwater Basin area (25,400 acres). Considering the already developed condition of the project area, redevelopment is not expected to result in a substantial change in impervious surface area, such that it would substantially interfere with groundwater recharge and would not impede sustainable groundwater management of the basin. The project would also implement sustainable landscaping practices that promotes surface infiltration, where possible. In addition, the project would incorporate LID techniques (bioretention areas) to manage stormwater runoff throughout the project site. These features would treat runoff and capture and naturally filter contaminants from the site's stormwater runoff. The increase of pervious areas would allow for groundwater infiltration and groundwater recharge. New landscaped areas would slow surface water runoff, allowing it to percolate into the ground, thereby providing increased benefits for groundwater recharge.

Project implementation is also required to conform with applicable local, state, and federal groundwater requirements. In addition, compliance with the *San Bruno General Plan* policies would require the protection of groundwater recharge areas, and would not impede sustainable groundwater management of the basin. The project would, therefore, not substantially decrease groundwater supplies and would not impede sustainable groundwater management of the basin. Therefore, operational impacts would be ***less than significant***.

Impact HWQ-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 offsite; substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or offsite; Create or contribute water that 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 with Mitigation).

Construction

During construction, stormwater drainage patterns could be temporarily altered. However, the project would involve implementing BMPs, required in the project SWPPP to minimize the potential for erosion or siltation in nearby storm drains and temporary changes in drainage patterns during construction. During construction, implementation of an erosion control plan is also required. Construction BMPs would capture and infiltrate small amounts of sheet flow into the ground such that offsite runoff from the construction site would not increase, ensuring that drainage patterns are not significantly altered. Measures required by the Construction General Permit would also limit site runoff during construction and would not alter stormwater drainage patterns. BMPs would be implemented to control construction site runoff, ensure proper stormwater control and treatment, and reduce the discharge of pollution to the storm drain system.

Thus, construction of the project would not substantially alter the existing drainage pattern of the area in a manner, which would result in substantial erosion or siltation or increase the rate or amount of surface runoff in a manner that would result in flooding on or offsite. Project construction would not result in an exceedance of drainage system capacities and the associated impact would be ***less than significant***.

Operation

An 18-inch storm drain is proposed on the southern boundary and through the center of the project site and would convey runoff via 24-inch storm drains to existing storm drains north and east of the project site. All drainage facilities would be designed to meet City of San Bruno standards and would drain to the existing public storm drain system. Runoff would continue to drain north to an existing 36-inch drain on Sneath Lane and east to an existing 48-inch storm drain system on Huntington Avenue, respectively. The 25-year and 100-year storm events would be considered in the project design consistent with the City's municipal code requirements. The storm drain capacity evaluation also accounts for projected buildout under the City's Storm Drain Master Plan.

Under existing conditions, the maximum total runoff inflow rate and volume are 44.9 cubic feet per second (cfs) and 4.972 million gallons, respectively. However, under Scenario B, the maximum impact scenario, the maximum total runoff inflow rate and volume would decrease to 43.2 cfs and 4.304 million gallons, respectively. Proposed conditions would result in a 3.8 percent and 13 percent reduction in peak flow rates and runoff volumes, respectively, for the 25-year 24-hour storm (Appendix 3.8-1). Reductions in peak runoff rates and volumes are due to the addition of landscape areas and bioretention planters throughout the development to meet C3 requirements. Stormwater management facilities, as required to meet local, state and federal requirements for water quality treatment as well as flood control, would be incorporated. Post-construction water quality treatment measures, as required by C.3 regulations, such as rainwater harvesting/reuse, infiltration, and bioretention areas. Roof runoff would either be directed into cisterns or rain barrels and used

for non-potable uses or directed to vegetated areas. Runoff from sidewalks, patios, and uncovered parking lots would also be directed onto vegetated areas. Stormwater runoff would be captured in drainage facilities or infiltrated into native soil to recharge groundwater. A Stormwater Control Plan Report, a description of site design and source control measures, drainage management areas, stormwater treatment measure sizing calculations, and a maintenance plan, would be submitted with the final design plans. Stormwater treatment methods would comply with C.3 requirements in the MRP and local stormwater requirements. All project-related development would comply with applicable federal, state, and local requirements discussed in Section 3.8.1.1, *Regulatory Setting*, including requirements for water quality, flood control, and stormwater management. Based on the analysis above, the project would not provide substantial additional sources of polluted runoff or impede or redirect floodflows.

Under proposed conditions, on-site drainage areas would be resized, but would generally collect runoff from the same contributing runoff area. As a result, the proposed storm drain utility plan generally maintains the tributary area draining to each connection to San Bruno's storm drain system. However, based on best available information for the existing drainage system, approximately 3.6 acres of drainage area would shift from Huntington Avenue to Sneath Lane under proposed conditions. As a result of the shift in drainage areas under proposed conditions, the storm drain mains on Huntington Avenue are predicted to experience a decrease in peak flow of 5.3 cfs (13 percent) and a decrease in total volume of 0.952 million gallons (22 percent). Conversely, the storm drain mains on Sneath Lane are predicted to experience an increase in peak flow of 3.6 cfs (67 percent) and an increase in total volume of 0.284 million gallons (47 percent). The storm drain mains along Sneath Lane range from 16-inch to 24-inch in diameter at the Tanforan connection points (Appendix 3.8-1). Drainage design would match the existing discharge locations and flow rates and volumes as much as possible. Any increase in peak flow would be detained on-site and metered at the existing discharge rate in the final design. Although the area has not previously experienced drainage capacity concerns and the additional flow is not expected to cause substantial flooding issues, the increase in stormwater peak flows and total volume is notable. Implementation of **Mitigation Measure HWQ-3** would reduce this impact.

With implementation of **Mitigation Measure HWQ-3**, operation of the project would not result in changes in stormwater runoff rates or volumes, which would exceed the capacity of existing or planned stormwater drainage systems. Operation-related impacts associated with the project would be ***less than significant with mitigation***.

Mitigation Measures

Mitigation Measure HWQ-3: Require a Site Survey to Verify Existing Drainage Capacity.

A site-specific survey shall be required to demonstrate that the existing system in Sneath Avenue can adequately accommodate the additional stormwater flow rates and volumes. Invert elevation data shall be required to determine precise drainage patterns. If required so as not to exceed existing discharge rates to the Sneath Lane drainage system, the project shall detain and meter flow rates on-site. The study and any on-site detention and flow metering plans shall be prepared by the project applicant and provided to the City Public Works Department for review and approval prior to the issuance of construction permits.

Impact HWQ-4: The project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan (Less Than Significant).

Commonly practiced BMPs would be implemented to control construction site runoff and to reduce the discharge of pollutants to storm drain systems from stormwater and other nonpoint-source runoff. As part of compliance with permit requirements during ground disturbing or construction activities, implementation of water quality control measures and BMPs would ensure that water quality standards would be achieved, including the water quality objectives that protect designated beneficial uses of surface and groundwater, as defined in the Basin Plan. Construction runoff would also have to comply with the appropriate water quality objectives for the region. The NPDES Construction General Permit also requires stormwater discharges not to contain pollutants that cause or contribute to an exceedance of any applicable water quality objectives or water quality standards, including designated beneficial uses.

The maximum volume of water anticipated to be dewatered from the project site is estimated to be approximately 73 AF over the 7-year project buildout. This volume represents approximately 0.2 percent of the average annual groundwater extractions from the Westside Basin. The volume of extraction associated with dewatering during construction is not anticipated to impede sustainable groundwater management within the basin (Appendix 3.8-2). In addition, implementing of the appropriate *San Bruno General Plan* (City of San Bruno 2009) policies would require the protection of groundwater recharge areas and groundwater resources, as required by a sustainable groundwater management plan.

Thus, construction and operation of the project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Construction- and operation-related impacts associated with the project would be ***less than significant***.

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3.9 Land Use

3.9.1 Introduction

This section evaluates the potential impacts on land use that could result from construction and operation of the Tanforan Redevelopment Project (project). This section also describes existing conditions at the project site as well as the regulatory framework for this analysis. Impacts resulting from implementation of the project, and feasible mitigation measures, where applicable, are also described.

This section also addresses the project's consistency with applicable land use goals, policies, and programs including the *San Bruno General Plan* and the Zoning Ordinance, the *Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport* (City/ County Association of Governments of San Mateo County 2012 [C/CAG]), and *Plan Bay Area 2050* (MTC and ABAG 2021).

Issues identified in response to the Notice of Preparation (NOP) (Appendix 1-1, *Notice of Preparation and Comments Received on the Notice of Preparation*) were considered in preparing this analysis. The NOP comments pertaining to land use include comment letters received from the City/County Association of Governments of San Mateo County, California Department of Transportation (Caltrans), San Francisco International Airport (SFO), and the Federal Aviation Administration (FAA) referencing potential land use conflicts with the Airport Land Use Compatibility Plan (ALUCP) for the environs of SFO. Multiple comments stated that, in light of the project site's location within Airport Influence Area (AIA) A and B of SFO, the height of the new development must be maintained below defined obstacle clearance surfaces. In addition, several comments state that due to the height of the proposed buildings, the project would have the potential to affect navigable airspaces as defined in Title 14, Code of Federal Regulations (CFR) Part 77.9, and must file a notice of proposed construction or alternation (Form 7460-1) with the FAA. Comments also state that the ALUCP provides that the proposed residential land uses under the project are incompatible due to the 70 decibel (dB) Community Noise Equivalent Level (CNEL) noise zone, which covers the project site. Furthermore, a majority of the project site falls within Safety Zone 4, which states that large child day care centers, biosafety level 3 and 4 facilities, and children's schools are incompatible uses. These issues are addressed in Section 3.9.3.5, *Impacts and Mitigation Measures*, under Impact LU-2.

3.9.2 Existing Conditions

3.9.2.1 Regulatory Setting

This section summarizes regulations and policies that are relevant to the analysis of the project's potential impacts on land use.

State

State Planning Law

California Government Code Section 65300 et seq. requires each California municipality to prepare a general plan. A general plan is defined as "a comprehensive, long-term general plan for the physical development of the county or city, and any land outside its boundaries which in the planning agency's judgment bears relation to its planning." State requirements call for general plans that "comprise an integrated, internally consistent and compatible statement of policies for the adopting agency." While allowing considerable flexibility, state planning laws do establish some requirements for the issues that general plans must address. The California Government Code establishes both the required content of general plans and rules for their adoption and subsequent amendment.

California Code of Regulations, Business and Professions Code

Section 11010 of Division 4: Real Estate of the California Business and Professions Code requires individuals offering subdivided property for sale or lease to disclose the presence of all existing and planned airports within 2 miles of the property or within an established AIA.

Senate Bill 743

Senate Bill (SB) 743, which was signed into law in 2013 and is codified in Section 21099 of the California Public Resources Code (PRC), intends to better align California Environmental Quality Act (CEQA) transportation impact analysis practices and mitigation outcomes with the state's goals to reduce greenhouse gas (GHG) emissions, encourage infill development, and improve public health through more active transportation. SB 743 is addressed in several locations in this EIR, including Section 3.0, *Environmental Impact Analysis*, and Section 3.14, *Transportation*.

SB 743 required the Governor's Office of Planning and Research (OPR) to establish new metrics for determining the significance of transportation impacts of projects within Transit Priority Areas (TPAs) and allows OPR to extend use of these metrics beyond TPAs. OPR selected vehicle miles traveled (VMT) as the preferred transportation impact metric and applied their discretion to require its use statewide. OPR issued a *Technical Advisory on Evaluating Transportation Impacts in CEQA* document in 2018, which contains technical recommendations regarding assessment of VMT, thresholds of significance, and mitigation measures. As further described in both Section 3.0, *Environmental Impact Analysis*, and Section 3.14, *Transportation*, of this EIR, the updated CEQA Guidelines that implement SB 743 established that vehicle delay, or level of service, can no longer be used as a criterion for identifying significant transportation impacts for most projects under CEQA.

As described in Section 3.0, *Environmental Impact Analysis*, of this EIR, SB 743 also created a new CEQA exemption for certain qualifying projects. Pursuant to PRC Section 21099, Modernization of Transportation Analysis for Transit-Oriented Projects, aesthetics and parking shall not be considered in determining if a project has the potential to result in significant environmental effects, provided the project meets all of the following criteria under PRC 21099.

- The project is on an infill site.[1]

[1] An *infill site* is a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses (PRC section 21099 (a)(4)).

- The project is in a TPA.[2]
- The project is a residential, mixed-use residential, or employment-center project.[3]

As shown in Chapter 2, *Project Description*, Figure 2-6, Metropolitan Transportation Commission (MTC) mapping indicates that the entire project site is within a Priority Development Area (PDA) and TPA due to its proximity to the San Bruno Bay Area Rapid Transit (BART) station and qualifying SamTrans bus routes. In addition, the project site is a qualifying infill site that is currently developed with existing commercial facilities. Furthermore, the proposed project would redevelop the project site with a transit-oriented, mixed-use development including housing, retail uses, life-science laboratory uses, office uses, private and publicly accessible uses, privately owned open space, and potentially a hotel. Therefore, the proposed project meets the above criteria as a qualifying mixed-use residential project on an infill site within a TPA for purposes of PRC Section 21099. This EIR does not consider aesthetics and parking in determining the significance of impacts under CEQA.

Regional and Local

Plan Bay Area 2050[4]

SB 375, also known as the Sustainable Communities and Climate Protection Act of 2008, requires the integration of land use, housing, and transportation planning to achieve regional GHG emissions reductions, adopted by the California Air Resources Board. SB 375 requires Metropolitan Planning Organizations to develop a Sustainable Communities Strategy (SCS)—a new element of the Regional Transportation Plan (RTP)—to plan for achieving these GHG reduction targets. The SCS must demonstrate the attainment of the regional GHG emissions-reduction targets while accommodating the full projected population of the region.

The Association of Bay Area Governments (ABAG) and MTC adopted Plan Bay Area 2050 in 2021. One of the main goals of Plan Bay Area 2050 is to reduce GHG emissions from cars and light-duty trucks through the year 2050 to meet state goals under SB 375. Plan Bay Area 2050 is the integrated land use/transportation plan and demographic/economic forecast for the nine-county San Francisco Bay Area region. The plan coordinates housing plans, open space conservation efforts, economic development strategies, and transportation investments.

Plan Bay Area 2050 functions as both the SCS and the RTP for the region. To reduce GHG emissions, Plan Bay Area 2050 promotes compact, mixed-use, infill development within walkable/bikeable neighborhoods close to public transit, jobs, schools, shopping, parks, recreation, and other amenities. Local jurisdictions voluntarily identified PDAs as appropriate locations for these types of neighborhoods. PDAs are eligible for capital infrastructure funds, planning grants, and technical assistance. As shown in Chapter 2, *Project Description*, Figure 2-6, the project site is within a PDA.

[2] A TPA is an area within 0.5 mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program or applicable regional transportation plan (PRC Section 21099 (a)(7)).

[3] An *employment-center project* is a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a TPA (PRC Section 21099 (a)(1)).

[4] ABAG and MTC are currently preparing Plan Bay Area 2050+, which will provide a focused update to Plan Bay Area 2050. It is anticipated that Plan Bay Area 2050+ will be adopted after completion of the project's CEQA review, and is therefore not applicable to the proposed project.

In addition, to further build on the transit-oriented development identified in Plan Bay Area 2050, the MTC adopted the Transit-Oriented Communities (TOC) Policy in September 2022 to support the region's transit investments by creating communities around transit stations and along transit corridors. The TOC Policy applies to the half-mile area around existing and planned transit stops and stations (i.e., regional rail, commuter rail, light rail, bus rapid transit, and ferries). Areas subject to the TOC Policy are categorized by Tiers 1 through 4 according to level of transit service. The project site is categorized as Tier 2, which indicates that a transit stop/station is served by two or more BART lines or BART and Caltrain (MTC 2025).

Compliance with the TOC Policy is voluntary for jurisdictions that want to advance the goals of Plan Bay Area 2050 or to be eligible and/or competitive for some MTC discretionary funding through One Bay Area Grant (OBAG) funding cycles. However, to ensure eligibility for OBAG funding and other discretionary funding, jurisdictions are required to demonstrate compliance with TOC Policy prior to the adoption of OBAG funding cycle 4, which is expected sometime in 2026.

The TOC Policy requirements consist of the following elements (MTC 2024).

- Minimum residential and commercial office densities for new development.
- Affordable housing production, preservation and protection, and stabilizing businesses to prevent displacement.
- Parking management.
- Transit station access and circulation.

As of the date of this EIR, the City of San Bruno has not adopted new policies or regulations that implement the TOC Policy.

Comprehensive Airport Land Use Compatibility Plan

The *Comprehensive Airport Land Use Compatibility Plan for the Environs of the San Francisco International Airport*, prepared by the City/County Association of Governments of San Mateo County, is a state-mandated land use compatibility plan that addresses the compatibility of surrounding land uses in local jurisdictions with airport operations.

The project site falls within AIAs A and B of San Francisco International Airport (SFO). Area A includes the entirety of San Mateo County, all of which is overflown by aircraft flying to or from SFO at least once per week at altitudes of 10,000 feet or fewer above mean sea level. Area B lies within Area A and contains areas exposed to aircraft noise above the 65 decibel (dB) Community Noise Equivalent Level (CNEL) contour or lying below critical airspace (C/CAG 2012).

The ALUCP establishes safety compatibility policies to protect public health and safety by minimizing the public's exposure to the risk associated with potential aircraft accidents in the airport vicinity. The ALUCP identifies five safety compatibility zones in the vicinity of SFO. As shown in Figure 3.7-1 in Section 3.7, *Hazards and Hazardous Materials*, the majority of the project site falls within SFO's Safety Compatibility Zone 4 and is, thus, subject to certain land use criteria pertaining to safety compatibility.

The ALUCP also establishes airport vicinity height limitations to protect public safety, health, and welfare by ensuring that aircraft can safely fly in the airspace around an airport and to protect the operational capability of airports. As noted in the ALUCP, the height of new development must be maintained below defined obstacle clearance surfaces. As shown in Figure IV-17 in the ALUCP, the project site falls within a range of 125 to 145 feet above mean sea level (AMSL) as defined by the North American Vertical Datum of 1998 (NAVD88[5]) on the airport's critical aeronautical surfaces. Since ground elevation at the project site ranges from 36 to 66 feet AMSL NAVD88 and assuming ground elevation would not change, the heights of buildings on the project site could be no higher than approximately 55 and 90 feet above ground level, depending on horizontal location, to be compatible with the Airspace Protection Policies of the SFO ALUCP.

Noise compatibility policies described within the ALUCP are intended to minimize the exposure of residents and occupants of future noise-sensitive development to excessive noise. CNEL noise contours identify areas where noise exposure is great enough to warrant land use controls to promote noise compatibility. As shown in Figure 3.10-2 in Section 3.10, *Noise*, the project site falls within the 70 dB CNEL noise contour.

The ALUCP includes policies and standards to protect people living in the vicinity of SFO from the effects of aircraft noise (C/CAG 2012). Policy NP-4, Airport/Land Use Compatibility Criteria, establishes criteria to determine the compatibility of proposed land uses in the Airport Noise Compatibility Zones. Residential uses are incompatible with noise levels above 70 dB.

BART Station Access Policy

The BART Station Access Policy is relevant to the project based on the project site's proximity to the San Bruno BART station, and the proposed pedestrian, bicycle, and vehicular circulation improvements within BART's jurisdiction. In June 2016, the BART Board adopted the new Station Access Policy to guide access practices and investments through 2025 (BART 2016). The policy identified six key goals and three strategy areas.

[5] The North American Vertical Datum of 1988 (NAVD 88) is the vertical control datum established in 1991 by the minimum-constraint adjustment of the Canadian-Mexican-United States leveling observations. It consists of a leveling network on the North American Continent, ranging from Alaska, through Canada, across the United States, affixed to a single origin point on the continent.

Goals

- **Safer, Healthier, Greener.** Advance the region's safety, public health, and GHG and pollution-reduction goals.
- **More Riders.** Invest in station access to connect more riders cost effectively, especially where and when BART has available capacity.
- **More Productive and Efficient.** Manage access investments, programs, and current assets to achieve goals at the least cost.
- **Better Experience.** Be a better neighbor, and strive for an excellent customer experience, including on the first and last mile of the trip to and from BART stations.
- **Equitable Services.** Invest in access choices for all riders, particularly those with the fewest choices.
- **Innovation and Partnerships.** Be an innovation leader, and establish durable partnerships with municipalities, access providers, and technology companies.

Strategies

- **Plan, Innovate and Partner.** Plan for systemwide access mode shift to reduce drive alone rates; partner with interested stakeholders to improve access to the BART system, and; plan all BART facilities to be accessible to all users.
- **Invest and Implement.** Invest in the pedestrian and bicycle network, on and off BART property; invest in transit connections; prioritize station access investments that support reverse peak travel, and; invest in strategic parking resources.
- **Manage and Assess.** Manage existing assets and; regularly collect station access data.

City of San Bruno General Plan

The *San Bruno General Plan*, adopted in 2009, establishes a vision and action plan for the City's long-term development. The plan outlines goals and policies to encourage balanced development that conserves and revitalizes established neighborhoods and commercial areas, while promoting mixed-use and transit-supportive developments adjacent to transit stations. The resulting land use classifications and development standards that are relevant to the project site are described below.

Goals and Policies

The general plan contains goals and policies related to Land Use and Urban Design, Economic Development, Transportation, Open Space and Recreation, Environmental Resources and Conservation, Health and Safety, and Public Facilities and Services. Applicable land use goals and policies from these elements and chapters, including the Housing Element, are discussed under Impact LU-2 below. Table 3.9-1 analyzes the project's consistency with applicable *San Bruno General Plan* policies that have been adopted to avoid or mitigate an environmental impact and describes the environmental impacts of any potential inconsistencies and proposed mitigation.

Table 3.9-1. Comparison to General Plan Goals and Policies

General Plan Policy	Consistency Analysis
Land Use and Urban Design Element	
Land Use and Urban Design Element: General Policy Consistency	CONSISTENT. Policies in the Land Use and Urban Design Element of the San Bruno General Plan adopted with the purpose of avoiding or mitigating environmental impacts include policies that seek to promote revitalization within existing developed areas; ensure that new development is sensitive to existing uses and minimizes glare; and work toward solutions to regional problems of open space preservation, noise attenuation, environmental hazards, affordable housing, pollution, and growth management.
Guiding Policy LUD-A: Promote development of El Camino Real as a boulevard with a series of "districts", with distinctive uses weaved together with unified streetscape, sidewalk improvements, and pedestrian amenities. Encourage residential development to promote walkability and transit use.	CONSISTENT. The proposed project would provide a minimum of 1,000 units, up to 1,514 multifamily residential units, and a network of public and private open spaces and pedestrian and bicyclists connections adjacent to the San Bruno BART station.
Guiding Policy LUD-B: Intensify land uses surrounding the new San Bruno BART station and planned San Bruno Caltrain station, including development of transit-oriented uses, regional shopping opportunities, high-intensity offices, hotels, and other similar uses.	CONSISTENT. The proposed project would redevelop the 44-acre Tanforan Mall adjacent to the San Bruno BART station with up to approximately 3.3 million square feet of transit-oriented, mixed-use development that would include life-science laboratory uses, office uses, retail uses, and potentially a hotel.
Guiding Policy LUD-C: Stimulate reuse and intensification with multi-use, transit-oriented development along El Camino Real, San Bruno Avenue, and San Mateo Avenue. Provide amenities serving pedestrians, bicyclists, and transit riders along these corridors.	CONSISTENT. The proposed project would redevelop the Tanforan Mall and provide up to approximately 3.3 million square feet of transit-oriented, mixed-use development with housing, retail, life-science laboratory, and office uses. The proposed project would be adjacent to the San Bruno BART station and provide pedestrian and bicyclists improvements and connections throughout the project site as well as to the BART station.
Guiding Policy LUD-F: Promote infill revitalization of the city's shopping centers—including the continued improvement of The Shops at Tanforan and Towne Center—to attract shoppers from throughout the region using convenient BART and Caltrain access.	CONSISTENT. The proposed project would redevelop the existing Tanforan Mall with a mix of uses, and provide convenient access and connections to the adjacent San Bruno BART station.
Implementing Policy LUD-4: Strengthen residential integrity in viable neighborhoods within the city's Redevelopment Area by eliminating incompatible uses and by facilitating upgrading of deteriorated structure.	CONSISTENT. The proposed project would redevelop the existing Tanforan Mall, which is within the City's Redevelopment Area, and provide up to 1,514 multifamily residential units.

General Plan Policy	Consistency Analysis
Implementing Policy LUD-7: Require any subdivision or development involving construction of more than five units, regardless of the number of parcels, to undergo design review. Require provision of open spaces and pedestrian connections within multifamily projects, as well as an active street frontage along arterial roadways.	CONSISTENT. The proposed project would undergo design review, and would provide public and private open spaces throughout the project site as well as activated street frontages.
Implementing Policy LUD-20: Promote establishment of strong regional retail anchors in The Shops at Tanforan and Towne Center. Support the further redevelopment and expansion of The Shops at Tanforan, and work with the developer and San Bruno Chamber of Commerce to market the center to a wider regional audience.	CONSISTENT. The proposed project would redevelop the existing Tanforan Mall into a mixed-use development. The proposed project would renovate the existing Century at Tanforan Theater, retain the existing Target retail anchor, and construct up to approximately 211,950 square feet of new retail space, while removing approximately 785,489 square feet of existing retail space.
Implementing Policy LUD-21: Strengthen the identity of the existing internal "street" network in The Shops at Tanforan and Towne Center. Encourage transition of these two centers into an outdoor/indoor shopping "district," as illustrated in Figure 2-6. Implement the following design techniques: • Promote reuse and infill of existing surface parking lots. • Strengthen the existing internal street network (as shown in the concept diagram) to promote walkability between stores, services, and restaurants. • Ensure that the street network links the two shopping centers and preserves the visibility of the existing shopping complexes from El Camino Real. • Design all new commercial spaces to be located and oriented toward the walkable internal streets and toward Sneath Lane, with clear connections to enclosed mall entrances. • Create fluid and visible pedestrian connections to and from the San Bruno BART Station.	CONSISTENT. As discussed in Chapter 2, *Project Description*, the project would include a revised internal roadway configuration along with amenities to enhance vehicular, emergency vehicle, pedestrian, and bicycle access in and to the project site. The project would break up the project site with pedestrian-scale streets and blocks. All internal streets, except D Street, would have pedestrian sidewalk, crosswalk, and lighting improvements and create environments that encourage walking. The proposed circulation network would improve pedestrian and bicycle access to the San Bruno BART station through the project site. New retail, residential, and commercial uses would be developed in existing surface parking lots. On El Camino Real, the project would add a crosswalk to the southern leg of El Camino Real, serving as a gateway to a pedestrian pathway running through the project site. The project would provide parking within two large structures located at the south of the project site, as well as within an existing retail parking structure, the cinema, and the three residential buildings.

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• In accordance with Ordinance 1284, consider construction of necessary parking structures to replace existing surface parking lots. Locate parking structures along the edges of the shopping district to minimize vehicular traffic on internal pedestrian-oriented streets. Improve landscaping along El Camino Real to differentiate and announce the "district" from other developments along El Camino Real. • Incorporate gateway features on El Camino Real near the northern edge of Towne Center where San Bruno's northern boundary exists. • Develop a uniform signage plan to coordinate signs along the internal shopping streets with signs along El Camino Real. • Coordinate with the San Bruno Chamber of Commerce to market the new "district" as a regional marketplace.	
Implementing Policy LUD-22: Ensure that vehicular, transit, bicycle, and pedestrian access to the city's regional retail centers is convenient, efficient, and safe. Coordinate transportation improvements with the new San Bruno BART station and SamTrans.	CONSISTENT. As discussed in Chapter 2, *Project Description*, the project would include a revised internal roadway configuration along with amenities to enhance vehicular, emergency vehicle, pedestrian, and bicycle access in and to the project site. The internal circulation system would improve the convenience, efficiency, and safety of travel through the site, and better connect the site to the San Bruno BART station and the SamTrans Transit Center.
Implementing Policy LUD-23: Consider development of new professional and administrative offices within The Shops at Tanforan and Towne Center, so that commuters can travel to and from San Bruno via the BART system. Allow offices on second and third levels, above retail establishments.	CONSISTENT. The proposed project would provide approximately 1,229,000 to 1,792,580 square feet of life-science laboratory and office uses in multi-story office buildings arranged around a retail village providing ground-floor retail uses.
Implementing Policy LUD-24: Coordinate regional commercial development at the San Bruno BART station with new office development constructed in adjacent South San Francisco areas. Accommodate mixed pedestrian and bicycle connections for office workers to access The Shops at Tanforan and Towne Center.	CONSISTENT. The proposed project would provide approximately 1,229,000 to 1,792,480 square feet of laboratory and office uses adjacent to the San Bruno BART station. As discussed in Chapter 2, *Project Description*, the project would include a revised internal roadway configuration along with amenities to enhance vehicular, emergency vehicle, pedestrian, and bicycle access in and to the project site. The proposed circulation network would improve pedestrian and bicycle access to the San Bruno BART station through the project site.

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Implementing Policy LUD-27: Create clear pedestrian connections from the BART and Caltrain stations to neighboring commercial nodes, as follows: • Install pedestrian connections between the San Bruno BART station, The Shops at Tanforan, and Towne Center. Coordinate these connections with infill development and the internal street network. • Install pedestrian connections between the planned San Bruno Avenue Caltrain station and Downtown. Coordinate these connections with infill housing construction.	CONSISTENT. As discussed in Chapter 2, *Project Description*, the project would include a revised internal roadway configuration along with amenities to enhance pedestrian and bicycle access in and to the project site. The project would break up the project site with pedestrian-scale streets and blocks. All internal streets, except D Street, would have pedestrian sidewalk, crosswalk, and lighting improvements and create environments that encourage walking. The proposed circulation network would improve pedestrian and bicycle access to the San Bruno BART station through the project site and provide direct access to the BART station.
Implementing Policy LUD-40: Promote high-intensity multi-use development along El Camino Real. Limit retail development to those sites north of Crystal Springs Road reinforcing existing retail activity in Downtown and/or The Shops at Tanforan/Towne Center.	CONSISTENT. The proposed project would redevelop the existing Tanforan Mall into a mixed-use development. The proposed project would renovate the existing Century at Tanforan Theater, retain the existing Target retail anchor, and construct up to approximately 211,950 square feet of new retail space, while removing approximately 785,489 square feet of existing retail space.
Economic Development Element	
Economic Development Element: General Consistency	CONSISTENT. Policies in the Economic Development Element of the San Bruno General Plan adopted with the purpose of avoiding or mitigating environmental effects seek to provide development opportunities that allow for the establishment of jobs within San Bruno commensurate with local residents' education and skills. While this is primarily an economic development and livability goal, providing local jobs commensurate with residents' education and skills also has the potential to reduce employment commute related vehicle miles traveled if it eliminates the need for residents to drive elsewhere for employment. While there can be no guarantee that Plan Area jobs will match San Bruno residents' skills and education, a 2024 American Community Survey found that 43.8% of San Bruno's population aged 25 years or more hold a bachelor's degree or higher, indicating a potentially good match between the characteristics of the resident population and the types of jobs that are likely to be provided (U.S. Census Bureau 2024). The project is therefore consistent overall with the intent of the policies of the Economic Development Element.
Transportation Element	
Transportation Element: General Policy Consistency	CONSISTENT. Policies in the Transportation Element of the San Bruno General Plan adopted with the purpose of avoiding or mitigating environmental impacts include policies that seek to provide for efficient, safe, and pleasant movement for all transportation modes including walking and cycling; improve connections to transit corridors and stations to avoid dependence on single-occupant vehicles; consider the introduction of reduced parking standards to reduce incentives for single-occupant vehicles; prohibit surface parking lots from interrupting pedestrian routes or affecting surrounding neighborhoods; prohibit the encroachment of transportation facilities on irreplaceable

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	resources; and preserve and enhance the unique natural features that constitute San Bruno's scenic roadways. As discussed in Section 3.14, *Transportation*, the project is consistent with SB 743 in that it promotes long-term sustainability based on denser infill development, reduces reliance on individual vehicles and improved mass transit, all with the ultimate goal of reducing GHG emissions. The project is expected to produce trip making patterns that blend those of denser urban environments and those of lower density suburbs, which represents a considerable improvement over existing conditions on-site for the current low-density, single use shopping complex. Per Section 3.14, *Transportation*, the proposed project would have a less-than-significant impact on VMT. It is anticipated that the proposed project would generally increase nonautomotive mode share as it would redevelop the existing Tanforan Mall with mixed-use, infill development adjacent to the San Bruno BART station, as similarly described for Plan Bay Area. The proposed project would include on-site and off-site improvements to the vehicle, pedestrian, and bicycle circulation network, as described in Chapter 2, *Project Description*. In addition, the proposed project would implement a TDM program that would include a number of measures to build upon the proposed infrastructure and on-site facilities and reduce single-occupancy vehicle trips in compliance with C/CAG requirements. The project would supply parking below San Bruno code requirements.
Guiding Policy T-A: Provide for efficient, safe, and pleasant movement for all transportation modes—vehicles, bicycles, transit, and pedestrians.	CONSISTENT. As discussed in Chapter 2, *Project Description*, the project would include a revised internal roadway configuration along with amenities to enhance vehicular, emergency vehicle, pedestrian, and bicycle access within and to the project site.
Guiding Policy T-E: Focus San Bruno's efforts on improvements to the non-motorized transportation system (i.e., bicycles, pedestrians, strollers, etc.) adjacent to transit corridors and stations, and their connections to those systems.	CONSISTENT. As discussed in Chapter 2, *Project Description*, the project would include a revised internal roadway configuration along with amenities to enhance vehicular, emergency vehicle, pedestrian, and bicycle access within and to the project site. The project site is adjacent to the San Bruno BART station and SamTrans Transit Center.
Guiding Policy T-I: Develop and maintain a comprehensive bicycle network within San Bruno, providing connections to BART and Caltrain, surrounding cities, employment and shopping areas, and natural areas.	CONSISTENT. As discussed in Chapter 2, *Project Description*, the project would include a revised internal roadway configuration along with amenities to enhance vehicular, emergency vehicle, pedestrian, and bicycle access within and to the project site. The proposed circulation network would improve pedestrian and bicycle access to the San Bruno BART station through the project site.
Guiding Policy T-J: Develop a safe, convenient, and continuous network of sidewalks and pedestrian paths within the city.	CONSISTENT. As discussed in Chapter 2, *Project Description*, the project would include a revised internal roadway configuration along with amenities to enhance vehicular, emergency vehicle, pedestrian, and bicycle access within and to the project site. The internal circulation system would improve the convenience, efficiency, and safety of travel through the site, and better connect the site to the San Bruno BART station and the SamTrans Transit Center.

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Implementing Policy 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.	CONSISTENT. The proposed roadway, transit, bicycle, and pedestrian circulation system would meet all applicable Americans with Disabilities Act (ADA) standards. In addition, the proposed project would provide 96 ADA-accessible parking spaces.
Implementing Policy 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.	CONSISTENT. The project would include publicly accessible bicycle racks in dismounting zones located internally along Tanforan Way, D Street, and Seabiscuit Avenue. The project would include up to 799 bicycle stalls, including 542 short-term bicycle parking spaces and 257 long-term bicycle parking spaces. In addition, the project would provide secure bicycle storage and showers, lockers, and changing rooms for cyclists.
Implementing Policy 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.	CONSISTENT. The project would include publicly accessible bicycle racks in dismounting zones located internally along Tanforan Way, D Street, and Seabiscuit Avenue. The project would include up to 799 bicycle stalls, including 542 short-term bicycle parking spaces and 257 long-term bicycle parking spaces.
Open Space and Recreation Element	
Open Space and Recreation Element: General Policy Consistency	CONSISTENT. Policies in the Open Space and Recreation Element of the San Bruno General Plan adopted with the purpose of avoiding or mitigating environmental impacts include policies that seek to develop and maintain parks and recreation facilities. The project includes privately owned, publicly accessible common areas including landscaped areas, outdoor gathering spaces, and plazas on the project site.
Guiding Policy OSR-A: Develop and maintain parks and recreation facilities for a wide variety of ages, abilities, and interests. Ensure that parks are ADA accessible, safe, and well maintained.	CONSISTENT. The open spaces included in the proposed project would allow for a variety of uses for a variety of ages. It would maintain this kind of use in the City's overall inventory of parks and recreation facilities. Open spaces provided as part of the proposed project would be constructed according to Americans with Disabilities Act (ADA) standards and would be maintained by the project applicant.
Guiding Policy OSR-C: Provide sufficient public open spaces and landscaped areas within Downtown, Bayhill Office Park, Tanforan District, El Camino Real, and Montgomery Street, as well as residential neighborhoods.	CONSISTENT. As discussed in Section 3.13, *Recreation*, the proposed project would provide publicly accessible open space in the form of a retail garden/courtyard, an office/lab amenity courtyard, pathways, landscaped areas, outdoor gathering spaces and plazas, and other open spaces such as landscaped parkways and programmable road that could be used for public recreational areas.

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Implementing Policy OSR-1: Maintain a parkland dedication/in lieu fee standard of 4.5 acres/1,000 residents.	CONSISTENT. As discussed in Section 3.13, *Recreation*, the City and surrounding region provide 191 acres of existing parkland, equating to 4.48 acres for every 1,000 residents, just shy of the City's goal of 4.5 acres for every 1,000 residents. With implementation of the project, the City would continue to be slightly deficient in meeting its parkland to population ratio. However, the project's provision of on-site recreational amenities would more than offset its anticipated demand, and the project would comply with the City's DIF Ordinance or pay development fees, which would be used, in part, to acquire properties on which to build new park sites subject to independent CEQA review.
Implementing Policy OSR-4: Undertake a program to add 20 acres of parkland to the City system over the next 20 years. Seize opportunities to develop and/or maintain parks and recreation facilities within existing residential neighborhoods through acquisition or preservation of former school facilities.	CONSISTENT. Under Scenario A, the project would include 98,500 sf of publicly accessible open space and 257,000 square feet of privately accessible open space, for a total of 356,000 sf (8.2 acres) of open space. Under Scenario B, the project would include 99,000 sf of publicly accessible open space and 251,000 sf of privately accessible open space, for a total of 350,000 sf (8 acres) of open space.
Implementing Policy OSR-6: Provide small public parks and/or plazas within BART and Caltrain station areas, within Downtown, and along El Camino Real. Provide benches, water fountains, and trees to serve as resting areas for pedestrians, commuters, and shoppers.	CONSISTENT. The proposed project would provide publicly accessible open space areas adjacent to the San Bruno BART station. The project would also incorporate site furniture such as built-in seating elements, picnic tables and benches, a fireplace area, and moveable outdoor furniture.
Environmental Resources and Conservation Element	
Environmental Resources and Conservation Element: General Policy Consistency	GENERALLY CONSISTENT. Policies in the Environmental Resources and Conservation Element of the San Bruno General Plan adopted with the purpose of avoiding or mitigating environmental impacts include policies that seek to protect the natural environment from destruction during new construction or redevelopment within San Bruno, reduce pollution levels within surface water, improve ambient air quality levels, and preserve and enhance historic and cultural resources. As shown in the resource sections of Chapter 3, *Environmental Impact Analysis*, the project would not result in significant environmental impacts on aesthetics, agriculture and forestry resources, biological resources, cultural resources, mineral resources, tribal cultural resources, or wildfire. The project would result in significant and unavoidable impacts for air quality related to the exposure of sensitive receptors to PM2.5 concentrations from fugitive dust and exhaust emissions generated by the daily vehicle trips during project operations. The proposed project would implement mitigation measures AQ-2-A, AQ-2-B, AQ-2-C, AQ-2-D, and AQ-3-A to reduce impacts related to PM2.5 concentrations, however, no further mitigation is available to reduce concentrations below the Air District's threshold.

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Guiding Policy ERC-B: Protect the natural environment, including wildlife, from destruction during new construction or redevelopment within San Bruno.	INCONSISTENT (CONSISTENT WITH MITIGATION). The proposed project includes construction of buildings that would occur within the already-developed footprint of the existing Tanforan Mall. As discussed in Section 3.2, *Biological Resources*, there would be some significant impacts on wildlife, including American peregrine falcon as well as resident and migratory birds, in particular during construction, but also during operation as a result of the introduction of new lighting and reflective surfaces. Heritage trees would also be removed. As a result, the project as proposed would not be consistent with this policy. It is important to note that the project's inconsistency with Guiding Policy ERC-B alone does not constitute an impact under CEQA. Policy conflicts are considered environmental impacts only when the policies themselves were adopted for the purpose of avoiding or mitigating an environmental effect, and such conflicts constitute significant environmental impacts only when the resulting direct environmental effects are significant. Nonetheless, these underlying impacts are addressed by implementation of Mitigation Measures BIO-1-A, BIO-4-A, and BIO-4-B. With these mitigation measures, the proposed project would be consistent with Guiding Policy ERC-B.
Guiding Policy ERC-F: Preserve and enhance historic and cultural resources within the city, particularly within the historic Downtown area.	INCONSISTENT (CONSISTENT WITH MITIGATION). As discussed in Section 3.3, *Cultural Resources*, and Section 3.15, *Tribal Cultural Resources*, the proposed project could result in some significant impacts on historic resource CHL No. 934 (Temporary Detention Camps for Japanese Americans-Tanforan Assembly Center in San Mateo County), archaeological resources, and tribal cultural resources. As a result, the project as proposed would not be consistent with this policy. It is important to note that the project's inconsistency with Guiding Policy ERC-F alone does not constitute an impact under CEQA. Policy conflicts are considered environmental impacts only when the policies themselves were adopted for the purpose of avoiding or mitigating an environmental effect, and such conflicts constitute significant environmental impacts only when the resulting direct environmental effects are significant. Nonetheless, these underlying impacts are addressed by implementation of Mitigation Measures CUL-1, CUL-2-A, CUL-2-B. With these mitigation measures, the proposed project would be consistent with Guiding Policy ERC-F.
Implementing Policy ERC-4: Encourage the use of Best Management Practices in conserving the city's valuable water supply sources.	CONSISTENT. The project would implement BMPs to minimize runoff, incorporate drought-tolerant and/or native landscaping, and implement water-conserving systems including efficient-flow and flush building fixtures and smart metering.
Implementing Policy 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. Require preservation of mature trees, as feasible, during design and construction.	CONSISTENT. The project would incorporate drought-tolerant and native plants into landscaping throughout the project site. In addition, the project would remove all existing 114 trees on the project site, however, if any of the trees are salvageable, they will not be removed. Furthermore, the proposed project would plant approximately 475 trees, for a total net increase of 361 trees on the project site.

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Implementing Policy ERC-19: Regulate new development—specifically industrial uses—as well as construction and demolition practices to minimize pollutant and sediment concentrations in receiving waters and ensure waterbodies within San Bruno and surface water discharged into San Francisco Bay meets or exceeds relevant regulatory water quality standards.	INCONSISTENT (CONSISTENT WITH MITIGATION). As discussed in Section 3.8, *Hydrology and Water Quality*, under Impact HWQ-1, compliance with existing safety regulations would reduce the potential for hazardous materials releases. Construction activities would require coverage under the statewide National Pollutant Discharge Elimination System (NPDES) General Permit for Discharge of Stormwater Associated with Construction Activity (Construction General Permit) and implementation of a Stormwater Pollution Prevention Plan (SWPPP). However, discharge of potentially contaminated dewatered groundwater could make its way into surface waters, which would impact surface water quality. It is important to note that the project's inconsistency with Implementing Policy ERC-19 alone does not constitute an impact under CEQA. Policy conflicts are considered environmental impacts only when the policies themselves were adopted for the purpose of avoiding or mitigating an environmental effect, and such conflicts constitute significant environmental impacts only when the resulting direct environmental effects are significant. Nonetheless, the underlying impacts related to water quality impacts during construction are addressed by implementation of Mitigation Measure HWQ-1, which requires groundwater monitoring well installation and sampling prior to dewatering activities and implementation of remedial measures, if applicable. With this mitigation measure, the proposed project would be consistent with Implementing Policy ERC-19.
Implementing Policy 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.	CONSISTENT. As discussed in Section 3.8, *Hydrology and Water Quality*, stormwater would be conveyed from multiple points across the project site and would be treated using LID measures, as required, with measures such as rainwater harvesting, reuse, infiltration, and bioretention. Roof runoff would either be directed into cisterns or rain barrels and used for irrigation or other non-potable uses or directed to vegetated areas. Runoff from sidewalks, patios, and uncovered parking lots would also be directed onto vegetated areas. Vegetated areas provide stormwater treatment via infiltration and biological uptake. Site design measures also include self-treatment and self-retaining areas. All stormwater conveyed to treatment facilities (bioretention areas) would be collected in a piped storm drain system prior to discharging into the public storm drain system.
Implementing Policy ERC-23: Regulate new development to minimize stormwater runoff rates and volumes generated by impervious surfaces, and maximize recharge of local groundwater aquifers when feasible. Utilize the recommendations provided in the Bay Area Stormwater Management Agency's Start at the Source Design Guidance Manual for Stormwater Quality Protection.	CONSISTENT. As discussed in Section 3.8, *Hydrology and Water Quality*, the amount of pervious surface area within the project site would increase upon project completion. The project would implement sustainable landscaping practices that promote surface infiltration, where possible. In addition, the Project would incorporate LID techniques (bioretention areas) to manage stormwater runoff throughout the project site. These features would treat runoff and capture and naturally filter contaminants from the site's stormwater runoff. The increase of pervious areas would allow for groundwater infiltration and groundwater recharge. New landscaped areas would slow surface water runoff, allowing it to percolate into the ground, thereby providing increased benefits for groundwater recharge.

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Implementing Policy ERC-24: 4 Require that new development incorporate features into site drainage plans that reduce impermeable surface area and surface runoff volumes. Such features may include: • 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.	CONSISTENT. As discussed in Section 3.8, *Hydrology and Water Quality*, stormwater would be conveyed from multiple points across the project site and would be treated using LID measures, as required, with measures such as rainwater harvesting, reuse, infiltration, and bioretention. Roof runoff would either be directed into cisterns or rain barrels and used for irrigation or other non-potable uses or directed to vegetated areas. Runoff from sidewalks, patios, and uncovered parking lots would also be directed onto vegetated areas. Vegetated areas provide stormwater treatment via infiltration and biological uptake. Site design measures also include self-treatment and self-retaining areas. All stormwater conveyed to treatment facilities (bioretention areas) would be collected in a piped storm drain system prior to discharging into the public storm drain system. In addition, the proposed project would prepare and implement a detailed erosion control plan.
Implementing Policy ERC-25: Maintain and improve air quality by requiring project mitigation, such as Transportation Demand Management (TDM) techniques, where air quality impacts are unavoidable.	INCONSISTENT (CONSISTENT WITH MITIGATION). The proposed project would implement a TDM Plan. However, as demonstrated in Section 3.1, *Air Quality*, the proposed project would result in significant and unavoidable impacts for air quality related to the exposure of sensitive receptors to PM2.5 concentrations from fugitive dust and exhaust emissions generated by the large daily vehicle trips during project construction and operation. It is important to note that the project's inconsistency with Implementing Policy ERC-25 alone does not constitute an impact under CEQA. Policy conflicts are considered environmental impacts only when the policies themselves were adopted for the purpose of avoiding or mitigating an environmental effect, and such conflicts constitute significant environmental impacts only when the resulting direct environmental effects are significant. Nonetheless, the underlying impacts related to air quality would be addressed with implementation of mitigation measures AQ-2-A, AQ-2-B, AQ-2-C, AQ-2-D, and AQ-3-A to reduce impacts related to PM2.5 concentrations. With these mitigation measures, the proposed project would be consistent with Implementing Policy ERC-25.
Implementing Policy ERC-26: Require dust abatement actions for all new construction and redevelopment projects.	INCONSISTENT (CONSISTENT WITH MITIGATION). As demonstrated in Section 3.1, *Air Quality*, the proposed project would result in significant and unavoidable impacts for air quality related to the exposure of sensitive receptors to PM2.5 concentrations from fugitive dust and exhaust emissions generated by the large daily vehicle trips during project construction and operation. The proposed project does not contain dust abatement measures, and would be inconsistent with this policy. It is important to note that the project's inconsistency with Implementing Policy ERC-26 alone does not constitute an impact under CEQA. Policy conflicts are considered environmental impacts only when the policies themselves were adopted for the purpose of avoiding or mitigating an environmental effect, and such conflicts constitute significant environmental impacts only when the resulting direct environmental effects are significant. Nonetheless, the underlying impacts related to dust would be

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	addressed with implementation of mitigation measures AQ-2-A, AQ-2-B, AQ-2-C, AQ-2-D, and AQ-3-A, which would reduce impacts related to PM2.5 concentrations. With these mitigation measures, the proposed project would be consistent with Implementing Policy ERC-26.
Implementing Policy ERC-30: Encourage new residential developments to incorporate measures such as shuttle services to major employment centers, commercial areas and transit areas, and provision of adequate transit facilities.	CONSISTENT. As described in Section 2.6.12, *Transportation Demand Management*, in Chapter 2, *Project Description*, the proposed project would implement a TDM program and be consistent with C/CAG requirements.
Implementing Policy ERC-33: Require all large construction projects to mitigate diesel exhaust emissions through use of alternate fuels and control devices.	INCONSISTENT (CONSISTENT WITH MITIGATION). Project construction would require the use of diesel-powered construction equipment. As a result, the project as proposed would not be consistent with this policy. It is important to note that the project's inconsistency with Implementing Policy ERC-33 alone does not constitute an impact under CEQA. Policy conflicts are considered environmental impacts only when the policies themselves were adopted for the purpose of avoiding or mitigating an environmental effect, and such conflicts constitute significant environmental impacts only when the resulting direct environmental effects are significant. Nonetheless, as demonstrated in Section 3.1, *Air Quality*, through implementation of Mitigation Measure AQ-2-A, the proposed project would be required to use clean diesel-powered or electric equipment (EPA-approved Tier 4 Final engines or cleaner) during project construction to control construction-related exhaust emissions. With this mitigation measure, the proposed project would be consistent with Implementing Policy ERC-33.
Implementing Policy ERC-34: Require that adequate buffer distances be provided between odor sources and sensitive receptors, such as schools, hospitals, and community centers.	CONSISTENT. As discussed in Section 3.1, *Air Quality*, the proposed project would not include any odor-generating facilities in proximity to sensitive receptors.
Implementing Policy ERC-38: Work cooperatively with the owners of The Shops at Tanforan to preserve the historic marker on-site.	INCONSISTENT (CONSISTENT WITH MITIGATION). As discussed in Section 3.3, *Cultural Resources*, a review of the proposed project design indicates that the memorial and garden commemorating the historic site may need to be relocated to accommodate future structures. The removal of the memorial plaque and garden would diminish the integrity of the historical resource's association. The proposed project does not contain protective measures such as those required by this policy. It is important to note that the project's inconsistency with Implementing Policy ERC-38 alone does not constitute an impact under CEQA. Policy conflicts are considered environmental impacts only when the policies themselves were adopted for the purpose of avoiding or mitigating an environmental effect, and such conflicts constitute significant environmental impacts only when the resulting direct environmental effects are significant. Nonetheless, the underlying impacts related to the historic marker on the Tanforan Mall are addressed by implementation of Mitigation Measure CUL-1, which would require that the applicant facilitate the relocation of the existing on-site memorial plaque and commemorative garden to another location on the project site. With this mitigation measure, the proposed project would be consistent with Implementing Policy ERC-38.

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Implementing Policy 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.	INCONSISTENT (CONSISTENT WITH MITIGATION). As discussed in Section 3.3, *Cultural Resources*, no archaeological sites or resources are known on the project site; however, excavation activities during project construction have the potential to uncover archaeological sites and resources. The proposed project does not contain protective measures such as those required by this policy. It is important to note that the project's inconsistency with Implementing Policy ERC-39 alone does not constitute an impact under CEQA. Policy conflicts are considered environmental impacts only when the policies themselves were adopted for the purpose of avoiding or mitigating an environmental effect, and such conflicts constitute significant environmental impacts only when the resulting direct environmental effects are significant. Nonetheless, the underlying impacts related to undiscovered cultural resources are addressed by implementation of Mitigation Measures CUL-2-A and CUL-2b, which require cultural resources awareness training for construction personnel, exploratory trenching, stop work protocols and a qualified archaeologist to examine and make treatment recommendations for any uncovered resources. With these mitigation measures, the proposed project would be consistent with Implementing Policy ERC-39.
Implementing Policy ERC-42: If demolition of a historical building is necessary for safety reasons, attempt to preserve the building façade for adaptive reuse during reconstruction. Offer funding through the Redevelopment Agency for façade preservation projects.	CONSISTENT. The proposed project would not demolish a historical building.
Implementing Policy 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.	INCONSISTENT (CONSISTENT WITH MITIGATION). As described in Section 3.5, *Geology, Soils, and Paleontology*, the project site is underlain by the Colma Formation, which is known to have yield significant vertebrate fossils. Because paleontological resources exist below the ground surface, ground disturbances such as excavating, grading, and resurfacing during project construction could affect any paleontological resources that may be present. The proposed project does not contain protective measures such as those required by this policy. It is important to note that the project's inconsistency with Implementing Policy ERC-45 alone does not constitute an impact under CEQA. Policy conflicts are considered environmental impacts only when the policies themselves were adopted for the purpose of avoiding or mitigating an environmental effect, and such conflicts constitute significant environmental impacts only when the resulting direct environmental effects are significant. Nonetheless, the underlying impacts related to undiscovered paleontological resources are addressed by implementation of Mitigation Measure GEO-6, which requires construction personnel training and a qualified paleontological resources specialist to assess any discovered resources and make a treatment recommendation. With this mitigation measure, the proposed project would be consistent with Implementing Policy ERC-45.

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Health and Safety Element	
Health and Safety Element: General Policy Consistency	CONSISTENT. Policies in the Health and Safety Element of the San Bruno General Plan adopted with the purpose of avoiding or mitigating environmental impacts include policies that seek to reduce the risk of loss of life, injuries, loss of property, or resources due to natural hazards including geologic and seismic, flooding, and wildfire hazards and hazardous materials; and reduce the impact of noise from automotive vehicles, SFO, railroad lines, and stationary sources. The project would be required to comply with general plan policies governing health and safety and is therefore consistent with these policies. As shown in the resource sections of Chapter 3, the project would not result in significant environmental impacts on wildfire. Furthermore, as discussed in Sections 3.7, *Hazards and Hazardous Materials*, 3.8, *Hydrology and Water Quality*, and 3.10, *Noise*, the health and environmental impacts associated with the proposed project would be less than significant with implementation of the appropriate mitigation measures.
Guiding Policy HS-B: Reduce the potential for damage from geologic hazards through appropriate site design and erosion control.	CONSISTENT. As discussed in Section 3.8, *Hydrology and Water Quality*, stormwater would be conveyed from multiple points across the project site and would be treated using LID measures, as required, with measures such as rainwater harvesting, reuse, infiltration, and bioretention. Roof runoff would either be directed into cisterns or rain barrels and used for irrigation or other non-potable uses or directed to vegetated areas. Runoff from sidewalks, patios, and uncovered parking lots would also be directed onto vegetated areas. Vegetated areas provide stormwater treatment via infiltration and biological uptake. Site design measures also include self-treatment and self-retaining areas. All stormwater conveyed to treatment facilities (bioretention areas) would be collected in a piped storm drain system prior to discharging into the public storm drain system. Additionally, the project design would comply with standard engineering and seismic safety design techniques, in accordance with the California Building Code (CBC), as well as applicable Building and Fire Codes adopted by the City of San Bruno to address site-specific geologic conditions.
Implementing Policy 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.	CONSISTENT. The project design would comply with standard engineering and seismic safety design techniques, in accordance with the CBC, as well as applicable Building and Fire Codes adopted by the City of San Bruno to address site-specific geologic conditions.

General Plan Policy	Consistency Analysis
Implementing Policy 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.)	CONSISTENT. As discussed in Section 3.5, *Geology, Soils, and Paleontology*, the project applicant has prepared a geotechnical investigation for the project site.
Implementing Policy HS-4: Prevent soil erosion by retaining and replanting vegetation, and by siting development to minimize grading and land form alteration.	CONSISTENT. Landscaping would be provided throughout the project site and around the perimeter. The project site would be graded during project construction, however, grading would be minimized to the greatest extent feasible.
Implementing Policy HS-5: Require preparation of a drainage and erosion control plan for land alteration and vegetation removal on sites greater than 10,000 sq. ft. in size.	CONSISTENT. San Bruno Municipal Code section 12.08.010 requires a grading permit for the proposed project. San Bruno Municipal Code section 12.12.050 requires a complete and detailed plan for erosion control with grading plans. Therefore, an erosion control plan would be prepared for the proposed project.
Implementing Policy HS-17: Require upgrade of the City's storm drain infrastructure proportionate with new development's fair share of demand. Require that stormwater management capacity and infrastructure are in place prior to occupancy of new development.	CONSISTENT. As discussed in Section 3.8, *Hydrology and Water Quality*, and Section 3.16, *Utilities and Service Systems*, the proposed project would utilize the existing stormwater infrastructure network to the extent feasible. An 18-inch storm drain is proposed on the southern boundary and through the center of the project site, and would convey runoff via 24-inch storm drains to existing storm drains north and east of the project site. In addition, the proposed project includes the addition of landscape areas and bioretention planters throughout the development to manage stormwater. Site stormwater design measures would direct runoff onto vegetated areas and roof runoff would be directed into cisterns or rain barrels and use rainwater for irrigation or other non-potable uses. Proposed project conditions would resize the area of existing drainage basin areas within the project site to redistribute runoff conveyed to the City's storm drain system.
Implementing Policy HS-18: Require developers to implement erosion and sedimentation control measures to maintain an operational drainage system, preserve drainage capacity, and protect water quality.	CONSISTENT. As discussed in Section 3.8, *Hydrology and Water Quality*, stormwater would be conveyed from multiple points across the project site and would be treated using LID measures, as required, with measures such as rainwater harvesting, reuse, infiltration, and bioretention. Roof runoff would either be directed into cisterns or rain barrels and used for irrigation or other non-potable uses or directed to vegetated areas. Runoff from sidewalks, patios, and uncovered parking lots would also be directed onto vegetated areas. Vegetated areas provide stormwater treatment via infiltration and biological uptake. Site design measures also include self-treatment and self-retaining areas. All stormwater conveyed to treatment facilities (bioretention areas) would be collected in a piped storm drain system prior to discharging into the public storm drain system. In addition, the proposed project would prepare and implement a detailed erosion control plan.

General Plan Policy	Consistency Analysis
Implementing Policy HS-22: Require that construction-related grading and other activities comply with the Association of Bay Area Governments' (ABAG) Manual of Standards for Erosion and Sediment Control Measures and with the California Stormwater Quality Association (CASQA), Stormwater Best Management Practice Handbook for Construction.	INCONSISTENT (CONSISTENT WITH MITIGATION). As discussed in Section 3.8, *Hydrology and Water Quality*, under Impact HWQ-1, compliance with existing safety regulations would reduce the potential for hazardous materials releases. Construction would require coverage under the statewide NPDES General Permit for Discharge of Stormwater Associated with Construction Activity (Construction General Permit) and implementation of a SWPPP. The CASQA's *Stormwater Best Management Practice Handbook for Construction* is designed to aid in compliance with stormwater regulations for the Construction General Permit and also contains a SWPPP template. Post-construction measures must also meet SMCWPPP requirements. Further, a stormwater control plan is required for the development. However, discharge of potentially contaminated dewatered groundwater could make its way into surface waters, which would impact surface water quality. It is important to note that the project's inconsistency with Implementing Policy HS-22 alone does not constitute an impact under CEQA. Policy conflicts are considered environmental impacts only when the policies themselves were adopted for the purpose of avoiding or mitigating an environmental effect, and such conflicts constitute significant environmental impacts only when the resulting direct environmental effects are significant. Nonetheless, the underlying impacts related to water quality impacts during construction are addressed by implementation of Mitigation Measure HWQ-1, which requires groundwater monitoring well installation and sampling prior to dewatering activities and implementation of remedial measures, if applicable. With this mitigation measure, the proposed project would be consistent with Implementing Policy HS-22.
Implementing Policy 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.	INCONSISTENT (CONSISTENT WITH MITIGATION). As discussed in Section 3.7, *Hazards and Hazardous Materials*, and Section 3.8, *Hydrology and Water Quality*, the potential for contaminated onsite soil or groundwater exists within the project area. Depending on the contaminant characteristics and extent of contamination in particular locations, ground disturbance and excavation activities conducted during construction are likely to encounter contaminated soil. Additionally, dewatering within the project site could result in the withdrawal of contaminated groundwater. The discharge of potentially contaminated dewatered groundwater could make its way into surface waters, which would impact surface water quality. It is important to note that the project's inconsistency with Implementing Policy HS-30 alone does not constitute an impact under CEQA. Policy conflicts are considered environmental impacts only when the policies themselves were adopted for the purpose of avoiding or mitigating an environmental effect, and such conflicts constitute significant environmental impacts only when the resulting direct environmental effects are significant. Nonetheless, the underlying impacts related to groundwater and contaminated soil during construction are addressed by implementation of Mitigation Measure HWQ-1 and Mitigation Measure HAZ-2-A, respectively, which require groundwater monitoring well installation and sampling prior to dewatering activities and implementation of remedial measures, if applicable, and preparation of a soil management plan prior to project construction. With implementation of these mitigation measures, the proposed project would be consistent with Implementing Policy HS-30.

General Plan Policy	Consistency Analysis
Implementing Policy 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.	INCONSISTENT (CONSISTENT WITH MITIGATION). As discussed in Section 3.10, *Noise*, the proposed project would place new residential uses within the SFO 70 dBA CNEL contour. As a result, the proposed project would not be consistent with this policy. It is important to note that the project's inconsistency with Implementing Policy HS-33 alone does not constitute an impact under CEQA. Policy conflicts are considered environmental impacts only when the policies themselves were adopted for the purpose of avoiding or mitigating an environmental effect, and such conflicts constitute significant environmental impacts only when the resulting direct environmental effects are significant. Nonetheless, the underlying impacts related to exposure to excessive noise is addressed by implementation of Mitigation Measure NOI-3. With these mitigation measures, the proposed project would be consistent with Implementing Policy HS-33.
Implementing Policy 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.	CONSISTENT. While this policy encourages noise buffers other than sound walls, it does not mandate or require them. As discussed in Section 3.10, *Noise*, through implementation of Mitigation Measures NOI-1-C and NOI-1-D, the proposed project would evaluate alternative ways, such as enclosure within a mechanical equipment room, to reduce impacts on residential uses from noise generated from the project's heating, ventilation, and cooling equipment and emergency generators.
Implementing Policy HS-37: Require that all sponsors of new housing (residential and senior housing units) record a notice of Fair Disclosure, regarding the proximity of the proposed development to San Francisco International Airport and of the potential impacts of aircraft operation, including noise impacts, per Ordinance 1646 and AB 2776.	CONSISTENT. The project applicant would be required to record a notice of Fair Disclosure for the proposed project as it would incorporate residential uses within proximity to SFO.
Implementing Policy HS-40: Prohibit new residential development within the 70+ Airport CNEL areas, as dictated by Airport Land Use Commission infill criteria unless, on a project by project basis, a proposed residential development is approved through the Local Agency Override process consistent with the Public Utilities Code Section 21675.1(d).	CONSISTENT. The proposed project proposes residential uses within the 70+ CNEL area designated by the ALUCP, and as such, would be inconsistent with the ALCUP's noise compatibility policies. Therefore, the project would be expected to receive a determination of inconsistency from the ALUCP and require a Local Agency Override by the San Bruno City Council. Notwithstanding the policy inconsistency and Local Agency Override, residential uses can be conditionally acceptable provided certain interior noise levels are met. As detailed in Section 3.10, *Noise*, the proposed project would achieve interior noise levels in accordance with Title 24 and general plan policies through implementation of Mitigation Measure NOI-3. Accordingly, the proposed project's inconsistency with the noise compatibility policies provided in the ALUCP would not result in a significant effect on the proposed residential uses on the project site. Refer to Section 3.10, *Noise*, for more information regarding the project's consistency with SFO's ALUCP noise policies.
Implementing Policy HS-51: Require all new development to comply with FAR Part 77 height restriction standards, in accordance with Airport Land Use Commission guidelines.	INCONSISTENT (CONSISTENT WITH MITIGATION). As detailed in Section 3.7, *Hazards and Hazardous Materials*, the ground elevation at the project site ranges from 36 to 66 feet AMSL NAVD88. Assuming ground elevations do not change, the heights of the proposed buildings (i.e., critical aeronautical surfaces) could be no higher than approximately 55 and 90 feet above ground level to be compatible with the SFO ALUCP (equivalent to 125 to 145 feet AMSL). Such compatibility would also be contingent on the issuance of a determination of no hazard from the FAA for any proposed structures

General Plan Policy	Consistency Analysis
	and determinations from C/CAG as the designated ALUC. As shown in Figure 2-10 in Chapter 2, *Project Description*, proposed building heights would range from 20 to 80 feet above ground level, depending on the location within the project site. However, the use of construction equipment (such as building cranes) or the construction of buildings with heights in excess of 55 feet above ground level could pose a safety hazard to construction workers and future residents inconsistent with height restriction standards. As a result, the project as proposed would not be consistent with this policy. It is important to note that the project's inconsistency with Implementing Policy HS-51 alone does not constitute an impact under CEQA. Policy conflicts are considered environmental impacts only when the policies themselves were adopted for the purpose of avoiding or mitigating an environmental effect, and such conflicts constitute significant environmental impacts only when the resulting direct environmental effects are significant. Nonetheless, these underlying impacts are addressed by implementation of Mitigation Measure HAZ-5. Furthermore, notification and consultation with the FAA under CFR Part 77.9 and subsequent determination of no hazard to air navigation would be required for implementation of the proposed project. Therefore, with implementation of Mitigation Measure HAZ-5, the proposed project would be consistent with Implementing Policy HS-51.
Public Facilities and Services Element	
Public Facilities and Services Element: General Policy Consistency	CONSISTENT. Policies in the Public Facilities and Services Element of the San Bruno General Plan adopted with the purpose of avoiding or mitigating environmental impacts include policies that seek to coordinate the provision of public services to all City residents; ensure that the City's water supply, wastewater collection and treatment, and solid waste collection systems provide adequate service; provide adequate public safety service for all San Bruno properties; provide public schooling for youth; and provide library materials and services. The project would include drought-tolerant and/or native landscaping, water-conserving systems including efficient-flow and flush building fixtures and smart metering, and biological treatment of stormwater runoff.
Implementing Policy PFS-8: Require expansion of the City's water distribution system proportionate with new development's fair share of demand.	INCONSISTENT (CONSISTENT WITH MITIGATION). As discussed in Section 3.16, *Utilities and Service Systems*, the proposed project would utilize the existing water infrastructure network to the extent feasible, and would require the installation of proposed on-site pipelines and the upsizing of the existing 8-inch pipelines upstream and downstream of Pressure Regulation Station RS20 to 12-inch pipelines to serve the project demand. The existing 12-inch pipelines along Sneath Lane and Huntington Avenue would not require upsizing, and would supply the new water mains for the proposed project. In addition, according to the City's Fire Department, additional 12-inch diameter pipeline is required within the project site to provide looping and supply the hydrants located on the west side of the project site. As a result, the project as proposed would not be consistent with this policy.

General Plan Policy	Consistency Analysis
	It is important to note that the project's inconsistency with Implementing Policy PFS-8 alone does not constitute an impact under CEQA. Policy conflicts are considered environmental impacts only when the policies themselves were adopted for the purpose of avoiding or mitigating an environmental effect, and such conflicts constitute significant environmental impacts only when the resulting direct environmental effects are significant. Nonetheless, these underlying impacts are addressed by implementation of Mitigation Measures UT-1-A and UT-1-B. With these mitigation measures, the proposed project would be consistent with Implementing Policy PFS-8.
Implementing Policy PFS-20: Require expansion of the City's sewer collection system proportionate with new development's fair share of demand.	INCONSISTENT (CONSISTENT WITH MITIGATION). As discussed in Section 3.16, *Utilities and Service Systems*, the proposed project would utilize the existing wastewater infrastructure to the extent feasible, and would require the construction of an on-site sewer system to serve the new building. The proposed main lines on the project site would generally run south to north and connect to the existing City trunk sewer in Sneath Lane at two locations intermediate between El Camino Real and Huntington Avenue. The project would abandon the City's existing 24-inch sewer that currently runs through the shopping center would be relocated and re-routed to along El Camino Real to Sneath Lane. The existing trunk sewer in Sneath Lane from El Camino Real to Seabiscuit Avenue would also be replaced as part of the project. Further, the project proposes to install a 30-inch pipe. However, additional upgrades would be needed to serve the project's demand. As a result, the project as proposed would not be consistent with this policy. It is important to note that the project's inconsistency with Implementing Policy PFS-20 alone does not constitute an impact under CEQA. Policy conflicts are considered environmental impacts only when the policies themselves were adopted for the purpose of avoiding or mitigating an environmental effect, and such conflicts constitute significant environmental impacts only when the resulting direct environmental effects are significant. Nonetheless, these underlying impacts are addressed by implementation of Mitigation Measure UT-1-C. With this mitigation measure, the proposed project would be consistent with Implementing Policy PFS-20.
Implementing Policy PFS-31: Ensure adequate fire water pressure as a condition of approval for all new development projects.	CONSISTENT. The proposed project would provide adequate fire water pressure to each of the new buildings.
Implementing Policy PFS-63: Require that all new development complies with California's Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24, Part 6).	CONSISTENT. The proposed project would incorporate energy efficiency measures that would exceed the CBC standards related to energy efficiency.

General Plan Policy	Consistency Analysis
Implementing Policy PFS-65: Require new development to incorporate passive heating and natural lighting strategies if feasible and practical. These strategies should include, but are not limited to, the following: • 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.	CONSISTENT. As discussed in Section 3.4, *Energy*, the proposed project would incorporate on-site renewable energy resources, such as photovoltaic systems, on parking garages and other large structures throughout the site, and would incorporate increased energy efficiency measures into building designs that would exceed the California energy efficiency standards (i.e., Title 24). Additionally, proposed buildings would be all-electric and include lighting, and the heating, ventilation, and air conditioning (HVAC) systems, along with other mechanical systems, that would be design around maximizing energy efficiency and natural lighting.
Implementing Policy PFS-66: Enforce landscape requirements that facilitate efficient energy use or conservation, such as drought-resistant landscaping and/or deciduous trees along southern exposures.	CONSISTENT. The project would include drought-tolerant and/or native landscaping, water-conserving systems including efficient-flow and flush building fixtures and smart metering, and biological treatment of stormwater runoff.
Implementing Policy 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.	CONSISTENT. As discussed in Section 3.16, *Utilities and Service Systems*, the proposed project would utilize the existing electrical infrastructure network to the extent feasible, and would require new connections to the surrounding PG&E electric grid to provide service to future buildings. However, the project would not require major upgrades to the existing electricity infrastructure serving the project site. In addition, no use of natural gas is anticipated for the project as the buildings would be all-electric.
Implementing Policy PFS-74: Work with telecommunication providers to ensure that telecommunications service is available for existing and future development.	CONSISTENT. As discussed in Section 3.16, *Utilities and Service Systems*, under the proposed project, demand for telecommunications would increase due to the increased density and from the transition from a shopping center to a mixed-use development, which generally have greater demand for technology services. In order to meet this demand, the project would install new connections to the surrounding communication lines along adjacent roadways. However, the project does not propose any major upgrades to the telecommunications infrastructure to serve the project site.

General Plan Policy	Consistency Analysis
Housing Element	
Sixth Cycle Housing Element (2023-2031): General Policy Consistency	CONSISTENT. Policies in the Housing Element of the San Bruno General Plan adopted with the purpose of avoiding or mitigating environmental impacts include goals and policies that seek to accommodate regional housing needs through a community-wide variety of residential uses by size, type, tenure, affordability, and location. The project site is included as housing opportunity Site 20 in the Housing Element, and was analyzed as housing opportunity Site 14 in the Housing Element IS/MND. The Housing Element assumed that a minimum of 1,002 housing units would be included at the project site, thereby increasing the opportunity for the City to meet housing needs, consistent with the intent of the Housing Element and to meet the City's Regional Housing Needs Allocation (RHNA) obligations. The Housing Element IS/MND evaluated the potential environmental impacts of developing 1,000 units on the site. The proposed project would increase the City of San Bruno's housing supply in support of its RHNA obligations, through the creation of a mixed-use, mixed-income community that includes a minimum of 1,000 units and up to approximately 1,514 residential units, comprising a mix of market-rate and below-market-rate units. The residences developed on the site would help the City meet its current RHNA requirements. The project is consistent with the minimum amount of housing envisioned in the Housing Element. While it exceeds the amount of housing evaluated in the Housing Element IS/MND by approximately 500 dwelling units, as discussed in Section 3.11, *Population and Housing*, the estimated project population would be within ABAG forecasts. In addition, the project site is an infill site where additional infrastructure needs can be accommodated, as discussed in Section 3.14, *Transportation*, and Section 3.16, *Utilities*. By focusing housing growth on a housing opportunity site, the project is consistent with the policy direction of the Housing Element to accommodate regional housing needs.

Existing General Plan Land Use Classifications

As shown in Chapter 2, *Project Description*, Figure 2-4, the southern portion of the main project site is designated as Regional Commercial, with the northern portion of the main project site and the adjacent parcel to the north of Sneath Lane are designated as Transit-Oriented Development.[6] These designations along with applicable densities (FAR) are described below.

- **Regional Commercial (maximum FAR 1.2 to 1.5).** The Regional Commercial designation allows 1.2 maximum FAR with potential additional discretionary 0.3 FAR incentive for projects that provide transportation demand measures and urban design amenities as specified in the Zoning Ordinance. Regional Commercial permits a variety of commercial uses intended to serve a regional market area, including retail sales; eating and drinking establishments; personal and business services; professional and medical offices; financial, insurance, and real estate offices; theaters and entertainment uses; educational and social services; auto repair and services; furniture and appliance stores; home improvement stores; and hotels. This designation is generally applied in areas easily accessible to automobiles (e.g., Highway 101, I-380, and El Camino Real) and transit (e.g., BART, Caltrain, and SamTrans).
- **Transit-Oriented Development (maximum FAR 2.0 to 3.5).** The Transit-Oriented Development designation allows 2.0 base maximum FAR combined for residential and/or nonresidential, 3.0 maximum for parcels of 20,000 square feet or larger, and a potential additional 0.5 FAR bonus for off-site improvements and urban design amenities, as outlined in the Zoning Ordinance. In addition to FAR maximums, residential density shall not exceed 40 units per acre at base FAR, and 50 units per acre with all incentives. This classification permits a variety of uses, either individually or in mix with other permitted uses, including retail sales; eating and drinking establishments; personal and business services; professional and medical offices; financial, insurance, and real estate offices; hotels and motels; educational and social services; government offices; and residential. This designation is generally applied in key corridors such as San Bruno Avenue and El Camino Real in areas with proximity to BART and Caltrain stations.

Land Use and Urban Design Element

The Land Use and Urban Design Element includes policies regarding land use classifications, focus areas and corridors, and views. Policies in the element seek to ensure that new development is sensitive to existing uses and is of the highest quality design and construction.

Open Space and Recreation Element

The Open Space and Recreation Element focuses on provision of neighborhood parks, plazas, and open spaces within walking distance of all San Bruno residents and workers. San Bruno recognizes the importance of open spaces to both residents' quality of life and the City's overall image, and seeks to provide accessible, safe, and well-maintained areas.

[6] City of San Bruno. 2024. Resolution No.2024-77, *A Resolution of the City Council of the City of San Bruno Amending the General Plan Land Use Diagram to Change Certain Land Use Designations to Transit-Oriented Development, and Amending the U.S. Navy Site and its Environs Specific Plan to Establish a Very High Density Residential Designation, and Amending the Specific Plan Land Use Diagram to Change the Designation of Certain Properties to Very High Density Residential.* Adopted: August 27, 2024.

City of San Bruno Housing Element

All California cities and counties are required to have a Housing Element included in their general plans that establishes housing objectives, policies, and programs in response to community housing conditions and needs. San Bruno's Housing Element focuses on the 2023 to 2031 planning period, consistent with the City's Regional Housing Needs Allocation (RHNA) as assigned to the City by ABAG and state law requirements. The policies within the Housing Element are an expression of the statewide housing goal of "a suitable living environment for every Californian," as well as a reflection of the unique housing needs of the San Bruno community. On August 27, 2024, the City adopted an amended Housing Element, and on October 21, 2024, the California Department of Housing and Community Development found the Housing Element to be in substantial compliance with the state law.

The project site is included as housing opportunity Site 20 in the Housing Element, the largest opportunity site identified.[7] The Housing Element assumed that a minimum of 1,002 housing units would be included at the project site and as part of the Housing Element's implementation, the City amended the general plan and rezoned a portion of the project site to allow for multifamily residential uses. Specifically, the northern portion of the main project site was redesignated from Regional Commercial to Transit-Oriented Development.[8] In addition, the main project site's existing zoning designation of P-D was amended to allow for multifamily housing as a permitted use, and the boundaries of the site's P-D designation were expanded to incorporate the parcel to the north of Sneath Lane.[9] Subsequently, the parcels to the north of Sneath Lane were also rezoned from Medium Density Mixed-Use (TOD-1) to Planned Development (P-D).[10]

City of San Bruno Transit Corridors Plan

The San Bruno Transit Corridors Plan was adopted by the San Bruno City Council on February 12, 2013. The plan articulates the community's vision for revitalized commercial corridors in proximity to the San Bruno Caltrain Station and BART Station (City of San Bruno 2014). The plan presents a vision and specific steps to improve the public and private realms within the Transit Corridors Area, which includes street frontages along El Camino Real, San Bruno Avenue, San Mateo Avenue, and Huntington Avenue in San Bruno. The Transit Corridors Plan outlines detailed policies, design

[7] The project site was evaluated as Housing Opportunity Site 14 as part of the Housing Element IS/MND, and was subsequently renumbered to Housing Opportunity Site 20 as part of the adopted 2023-2031 Housing Element. This Draft EIR uses Housing Opportunity Site 20 to identify the project site consistent with how the site is referenced in the adopted Housing Element.

[8] City of San Bruno. 2024. Resolution No.2024-77, A *Resolution of the City Council of the City of San Bruno Amending the General Plan Land Use Diagram to Change Certain Land Use Designations to Transit-Oriented Development, and Amending the U.S. Navy Site and its Environs Specific Plan to Establish a Very High Density Residential Designation, and Amending the Specific Plan Land Use Diagram to Change the Designation of Certain Properties to Very High Density Residential*. Adopted: August 27, 2024.

[9] City of San Bruno. 2024. Ordinance No. 1954, *An Ordinance of the City Council of the City of San Bruno Amending the Planned Development (P-D) District Created by Ordinance No. 1087 to Add Multi-Family Housing as a Permitted Use on the 11.28 Acre Site at 1178 El Camino Real, and to Amend the Boundaries of the P-D District Created by Ordinance No. 1087 to Include the 1.40 Acre Parcel at 1292 Huntington Avenue with Multi-Family Housing as a Permitted Use*. Adopted: September 10, 2024.

[10] City of San Bruno. 2024. Ordinance No. 1955, *An Ordinance of the City Council of the City of San Bruno Amending the Zoning Map to Change the Zoning Designation of 1.40 Acres at 1292 Huntington Avenue from the Medium Density Mixed-Use (TOD-1) District to the Planned Development (P-D) District, and 0.57 Acres at 1151 El Camino Real From Neighborhood Commercial (C-N) District to High Density Mixed-Use (TOD-2) District*. Adopted: September 10, 2024.

guidelines, and development standards to steer future public and private realm improvements in the Transit Corridors Area.

The Transit Corridors Plan applies to the segment of El Camino Real between Interstate 380 and Crystal Springs Road, San Mateo Avenue between Interstate 380 and El Camino Real, San Bruno Avenue between Highway 101 and Acacia Avenue, and Huntington Avenue between San Bruno Avenue and the San Bruno BART Station. Therefore, only project-related improvements that could occur along Huntington Avenue would overlap with the Transit Corridors Area.

Chapter 6 of the Transit Corridors Plan includes public realm design guidelines that apply to development within City-owned roadways, medians, sidewalks, planter strips, and public open spaces within the Transit Corridors Area. The intent of the public realm design guidelines is to enhance the pedestrian environment along the Transit Corridors Area's key roadways, as well as within its public open spaces, facilitating a balance between the needs of transit, automobiles, bicyclists, and pedestrians, including those with disabilities. Furthermore, the design guidelines provide opportunities for "green" design features in the public realm, supporting San Bruno's sustainability goals.

The following public realm design guidelines are relevant to the project-related improvements that could occur along Huntington Avenue.

- **A1-1:** Reduce pedestrian crossing distance at crossing locations by utilizing features such as bulb-outs in parking lanes between parking spaces and at corners. Provide well-designed traffic calming devices on along corridors, including traffic circles, bollards, bulb-outs and chicanes to create pleasant livable environment.
- **A1-3:** Provide adequate buffer between pedestrian zones and vehicle driving zones consisting of landscaping and/or curbside parking to ensure safe and appealing pedestrian environment within the Pedestrian Emphasis Zone.
- **A2-2:** Ensure that all crosswalks have ramps and warning strips that comply with Americans with Disabilities Act standards.
- **A2-5:** Provide bulb-outs along El Camino Real, San Bruno Avenue, and Huntington Avenue at intersections and pedestrian crossing locations.
- **A2-6:** Consider development of new mid-block pedestrian crossing locations on El Camino Real, San Bruno Avenue and Huntington Avenue when justified by pedestrian traffic study, in conjunction with site development or in response to existing pedestrian demand.
- **A2-7:** Encourage the design of corner bulb-outs at intersections to function as pocket plazas with pedestrian amenities such as landscaping, seating, trash receptacles, and bicycle racks.
- **A3-1:** Ensure that all streets have continuous sidewalks conforming to the Americans with Disabilities Act standard of a minimum width of five feet. Where possible, encourage a minimum six-foot wide pedestrian zone to provide comfortable pedestrian circulation.
- **A4-1:** Provide both pedestrian-oriented and automobile-oriented street lighting within the whole Transit Corridors Plan area, with first priority to the Pedestrian Emphasis Zones designed to meet established lighting standards to provide safe and comfortable pedestrian environment.
- **A4-2:** Provide pedestrian-friendly streetscape amenities—including seating, trash receptacles and public art—at key nodes along El Camino Real, San Bruno Avenue, San Mateo Avenue, and Huntington Avenue.

City of San Bruno Walk 'N Bike Plan

The City of San Bruno Walk 'N Bike Plan promotes mobility within the City of San Bruno by outlining specific improvements to ensure that walking and biking are safe, comfortable, and convenient. Proposed improvements include crosswalk enhancements; addition of safety signs to roadways; establishment of better connections between the project site, BART, and other key City features; and building of bikeways. Specifically, the Walk 'N Bike Plan contains several projects within or near the project site, including a proposed multi-use trail between El Camino Real and Huntington Avenue along the I-380 off-ramp to El Camino Real to provide a direct path to the San Bruno BART station. These improvements are shown in Figure 3.14-5 in Section 3.14, *Transportation*, of this EIR (City of San Bruno 2016).

Grand Boulevard Initiative

The Grand Boulevard Initiative is a collaboration among 19 cities, counties, and local and regional agencies, including the City of San Bruno, to improve the performance, safety, and aesthetics of El Camino Real from Daly City (Mission Street) to San Jose (Diridon Caltrain Station).

Guiding principles of the Grand Boulevard Initiative applicable to the project include (Grand Boulevard Initiative 2018):

- Target housing and job growth in strategic areas along the corridor.
- Encourage compact mixed-use development and high-quality urban design and construction.
- Create a pedestrian-oriented environment and improve streetscapes, ensuring full access to and between public areas and private developments.
- Develop a balanced multimodal corridor to maintain and improve mobility of people and vehicles along the corridor.
- Provide vibrant public spaces and gathering places.
- Strengthen pedestrian and bicycle connections with the corridor.
- Pursue environmentally sustainable and economically viable development patterns.

San Bruno Zoning Ordinance

The San Bruno Zoning Ordinance controls development through the establishment of zoning districts and accompanying regulations for permitted and conditional uses and standards for development, such as height, bulk, setback, and lot coverage. As shown in Chapter 2, *Project Description*, Figure 2-5, the project site, including the parcels to the north of Sneath Lane, is designated as P-D.

The P-D zoning district allows a mixture of uses, or unusual density, building intensity, or design relationships which will produce an environment and use of land in each case superior to that which would result from the regulations of the standard districts or combination of districts. All uses within this district are conditional uses, therefore any and all compatible land uses consistent with the City's General Plan are conditional uses in a P-D district, provided such use or uses have been designated on a development plan and approved by the planning commission and city council pursuant to the provisions of this section. Conditional uses may be authorized by the approval of a planned development permit.

The existing P-D zoning district on the project site was established in 1966 under Ordinance No. 1087 to allow for the existing mall uses currently on the site. As discussed above, as part of implementing the Housing Element Update, the City amended the P-D zoning district to extend it to the parcel north of Sneath Lane and allow for multifamily residential uses (Ordinance Nos. 1954 and 1955, adopted by the San Bruno City Council on September 10, 2024).

City Ordinance No. 1446

Ordinance 1446, adopted in 1984, broadly authorized the City to approve the enlargement or extension of existing buildings and structures, and the construction of new buildings and structures, without further voter approval, provided that the height of such enlarged or new buildings and structures not exceed the tallest building on the Tanforan Mall site at the time of adoption. The prevailing definition of "building height" at that time was from the 1979 Uniform Building Code (UBC), which San Bruno adopted in 1982. The Target building, standing at 79 feet, 7 inches tall (as measured under the provisions of the 1979 UBC), was the tallest building on the project site in 1984, and remains the tallest building on the site today (Gensler 2023). Therefore, the allowable relative height of any subsequent building on the project site, without requiring further voter approval, is 79 feet, 7 inches. The ordinance also provides an "express exception" to any other ordinance requiring a vote of the people for any building or structure in excess of three stories or 50 feet, or for the construction of any multi-story parking building or structure. Finally, the ordinance also approved the extension of the then-existing parking structure, provided that the extension does not exceed the height or levels of the existing structure and construction of a one-story parking structure at a height approximately equal to the grade level of El Camino Real.

3.9.2.2 Environmental Setting

Regional Setting

The project site is in the City of San Bruno between the coastal range and San Francisco Bay along the northern Peninsula. San Bruno is a 5.5-square-mile city in northern San Mateo County on the eastern side of the San Francisco Peninsula. San Bruno is approximately 12 miles south of San Francisco, immediately south of the City of South San Francisco, immediately north of the City of Millbrae, and west of SFO. The City is bounded by Highway 101 on the east and the Coast Ranges on the west. The older, eastern half of San Bruno contains a diversity of land uses and residential types, while the western half is composed primarily of single-family subdivisions. The City is connected to major transportation corridors by Highway 101, Interstates (I-) 280 and 380, and El Camino Real. The downtown area is centered along San Mateo Avenue from El Camino Real to San Bruno Avenue.

Project Site

As shown in Chapter 2, *Project Description*, Figure 2-2 of this Draft EIR, the project site comprises a 44-acre area in the northeastern portion of San Bruno, and is generally bounded by Sneath Lane to the north, Huntington Avenue to the east, Interstate 380 (I-380) to the south, and El Camino Real (State Route 82) to the west. The project site also includes a vacant parcel north of Sneath Lane between Huntingon Avenue and Maple Street. The project site consists of the Tanforan Mall and a vacant parcel north of Sneath Lane. The mall property is currently developed with various retail uses, parking structures, and surface parking. The project site consists of a primary two-story mall building that includes three attached anchor stores currently occupied by Hyundai of San Bruno (formerly Sears), Target, and JCPenney. A three-level parking structure serving Target and a two-

level steel structure are located in the southern portion of the project site. A Cinemark Century movie theater and an automotive service building are located in the northern portion of the project site. The movie theater sits atop a three-level parking structure. As shown in Chapter 2, *Project Description*, Table 2-1 of this Draft EIR, the project site is currently occupied by primarily retail uses with a vacant lot.

The project site (including the main site and the northern parcel) slope from west to east. Topographic elevations range from approximately 36.5 to 66 feet at the main site, and 38.5 to 44.5 feet at the north parcel.

Existing uses directly east of and adjacent to the project site are the BART station, a BART parking structure, and a joint BART/City police station. Existing commercial uses are located north of the project site; single-family residential uses and commercial uses in the City of South San Francisco are located to the east; I-380 is located to the south, with residential uses on the south side of I-380; and commercial uses, multifamily residential uses, and the Golden Gate National Cemetery is located to the west. In addition, as detailed in Chapter 2, *Project Description*, while there are no San Francisco Public Utilities Commission easements within the project site, SFPUC maintains an easement adjacent to the project site. The San Andreas No.1 water transmission pipeline is located in an easement along the western edge of the project site in El Camino Real.

3.9.3 Environmental Impact Analysis

This section describes the environmental impacts of the project on land use. It describes the thresholds used to determine whether an impact would be significant and methods used to evaluate the impacts. Measures to mitigate significant impacts are provided, where appropriate.

3.9.3.1 Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, the project would have the potential to have a significant effect on land use if it would result in any of the following conditions.

a. Physically divide an established community?

b. 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?

3.9.3.2 Methodology and Approach

CEQA requires that an EIR consider whether a proposed project may conflict with any applicable land use plan, policy, or regulation that was adopted for the purpose of avoiding or mitigating an environmental impact. This environmental determination differs from the larger policy determination of whether a proposed project is consistent with a jurisdiction's general plan. The former determination, which is intended for consideration in a CEQA document, is based on, and limited to, a review and analysis of environmental effects. The latter determination, by comparison, is made by the decision-making body of the jurisdiction and is based on the jurisdiction's broad discretion to assess whether a proposed project would conform to the policies and objectives of its general plan as a whole. In addition, the broader general plan consistency determination takes into account all evidence in the record concerning the project characteristics, its desirability, and its economic, social, and other non-environmental effects.

Conflicts of a project with land use policies do not, in and of themselves, constitute significant environmental impacts. Policy conflicts are considered environmental impacts only when the policies themselves were adopted for the purpose of avoiding or mitigating an environmental effect. Such conflicts constitute significant environmental impacts only when the resulting direct environmental effects are significant.

3.9.3.3 Buildout Scenario Evaluated

As discussed in Section 3.0.3.1, *Buildout Scenarios*, for each resource area studied, the EIR evaluates the scenario with the greatest potential to result in a significant impact. In some cases, impacts would be the same regardless of the buildout scenario, so the analysis does not evaluate a specific buildout scenario. This approach ensures that the EIR identifies the maximum potential impacts of the project based on reasonable foreseeable development outcomes. Table 3.9-2 summarizes the approach used for each impact analysis related to land use.

Table 3.9-2. Impact Analysis Approach for Land Use

Impact Criteria	Scenario A	Scenario B	EIR Approach
Impact LU-1: Physically divide an established community?	—	—	Same. Both scenarios have the same project area and would have the same impact.
Impact LU-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?	Both scenarios have the same project area and similar types of uses. Scenario A includes more R&D uses and fewer residential units.	Both scenarios have the same project area and similar types of uses. Scenario B includes more residential units and less R&D use.	Both scenarios evaluated separately. Both scenarios have the same project area and similar types of uses and therefore should have similar impacts in terms of plan consistency. However, there may be differences in degree of conflict related to the ALUCP as it includes compatibility standards specific to both R&D and residential uses. Therefore, both scenarios are evaluated separately, where applicable.

3.9.3.4 Impacts and Mitigation Measures

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

The physical division of an established community typically refers to the construction of a linear feature, such as an interstate highway or railroad tracks, or removal of a means of access, such as a local bridge, that would affect mobility within an existing community or between a community and outlying area. For example, I-380 along the southern perimeter of the project site creates a physical division from the project site and the residential uses on the south side of I-380. A project's land use and planning impacts are site specific. The two buildout scenarios would occur on the same parcels; therefore, there would be no difference in location that would affect the analysis. Therefore, as discussed under Section 3.9.3.3, *Buildout Scenario Evaluated*, above, impacts would be the same regardless of Scenario A (R&D Scenario) or Scenario B (Residential Scenario) for purposes of the impact analysis.

The project does not involve the construction any of the linear features discussed above and would not remove any means of access. The project also includes multimodal transportation improvements and streetscape enhancements which would enhance connectivity within the project site and improve linkages with surround areas. By improving connectivity and land use transitions, the project would make it easier for people to travel throughout the community, city, and region.

Proposed improvements to existing roadways and infrastructure would not introduce new physical divisions. Instead, the proposed improvements (discussed in Chapter 2, Section 2.6.8, *Transportation, Circulation, and Access*), would provide better multimodal connectivity between existing surrounding residential communities, the project site, and local or regional destinations. These include improved crossings on Sneath Lane and El Camino Real, may include the construction of a two-way cycle track on the south side of Sneath Lane, and connections to the City's planned two-way cycle track on Huntington Avenue.

While the development of new buildings proposed under the project may result in more building footprints spread throughout the project site than what is currently within the existing site, the proposed project would incorporate improvements to vehicle roadways, transit access, and bicycle and pedestrian facilities that would improve connectivity. The project would break up the project site with pedestrian-scale streets and blocks. All internal streets, except D Street, would have pedestrian sidewalk, crosswalk, and lighting improvements and create environments that encourage walking. The proposed project would also facilitate transit and pedestrian connectivity between the project site and local mass transit services, which would further promote connectivity between the project site and the larger community.

In addition, the project would promote infill development in an existing urbanized area. The project's objectives and building designs were designed with the intent to promote compatibility with existing uses. Rather than divide an existing community, the project would reduce the potential for conflicts between differing land uses through streetscape improvements and urban design that would include the following.

- **Streetscape improvements.** all internal streets, except D Street, would have pedestrian sidewalk, crosswalk, and lighting improvements and create environments that encourage walking. On El Camino Real, the project may add a crosswalk to the southern leg of El Camino Real. The project would install leading pedestrian intervals with all signals at project entry and exit points. At crossings that have longer crossing distances, the project would add pedestrian refuge islands.
- **Building design.** the project would be designed to enhance adjacent public and private spaces and buildings to be oriented to frame streets as public spaces. Specifically, exterior project elements proposed include increased trees and plantings to support the local environment, and other design measures which would create shade and wind protection throughout the project site.

As the project would not introduce any physical barriers to the project site and would likely improve connectivity within the community through improvements, the impact would be ***less than significant***. No mitigation measures are required.

Impact LU-2: The project would not result in an environmental impact due to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect (Less Than Significant With Mitigation).

Plan Bay Area 2050

As discussed in Section 3.9.2.1, *Regulatory Setting*, Plan Bay Area 2050 promotes compact, mixed-use, infill development within walkable/bikeable neighborhoods close to public transit, jobs, schools, shopping, parks, recreation, and other amenities in order to reduce GHG emissions and adverse health impacts; increase housing opportunities, employment opportunities, access to affordable housing, and nonautomotive mode share and the effectiveness of the transportation system; and focus development within the existing urban footprint.

Plan Bay Area 2050 also promotes the reduction of GHG emissions through the identification of Transit-Rich Areas (TRAs), formerly known as TPAs, and PDAs. TRAs are areas where at least 50 percent of the area is within 0.5 mile of a major transit stop such as an existing or planned rail station or bus routes with headways of 15 minutes or better during morning and evening peak periods. PDAs are areas near existing job centers or frequent transit that are locally identified (i.e., by towns, cities, or counties) for housing and job growth (MTC and ABAG 2021). As identified in Figure 2-6, the entirety of the project site is within a PDA and TRA/TPA, and is thus consistent with the general policy direction of Plan Bay Area 2050.

In addition, to further build on transit-oriented development identified in Plan Bay Area 2050, the MTC adopted the TOC Policy, which applies to areas within 0.5 mile around existing and planned transit stops and stations (i.e., regional rail, commuter rail, light rail, bus rapid transit, and ferries). As mentioned above, compliance with TOC Policy is voluntary for jurisdictions that want to advance the goals of Plan Bay Area 2050 or to be eligible and/or competitive for some MTC discretionary funding through the OBAG funding cycle. However, to ensure eligibility for OBAG or other discretionary funding, jurisdictions must demonstrate compliance with TOC Policy, which includes requirements for: minimum residential and commercial office densities for new development; affordable housing production, preservation and protection, and stabilizing businesses to prevent displacement; parking management; and transit station access and circulation.

The project is consistent with the key objectives of Plan Bay Area 2050, including the goal of fostering compact infill development and jobs in proximity to transit to reduce VMT and GHG emissions. In addition, the project would be located on an infill site within an urbanized area and focus growth within a PDA and TPA/TRA. Furthermore, the project also calls for pedestrian- and bicycle-friendly streets within the project site, and would provide compact, job-generating development close to transit. The project would provide for a net increase in jobs served by regional transit via the Caltrain and BART stations in a configuration intended to reduce reliance on automobiles. These features of the project are consistent with and directly implement the goals of Plan Bay Area 2050. The project would also be consistent with the requirements of the TOC Policy related to residential density, the provision of new affordable housing, and access to the San Bruno BART station and Caltrain station, as described above, which would be enforced through the P-D zoning designation.[11]

[11] This information regarding the TOC Policy is provided for information only, as the City has not yet adopted policies or standards to implement the TOC Policy.

The proposed multifamily residential uses would provide a new opportunity for housing to be developed on the project site, a location close to employment and transit centers and where no housing currently exists. As discussed in Section 3.11, *Population and Housing*, population growth anticipated to occur as a result of the project would be within the range of anticipated city growth under ABAG's Projections 2050. Therefore, impacts of the project related to conflicts with Plan Bay Area 2050 would be ***less than significant***.

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

As discussed above, the ALUCP outlines the types of land uses that are compatible with the SFO. Pursuant to state law, when a general plan amendment and/or zoning amendment are proposed within AIA Area B of an adopted Comprehensive Land Use Plan, a referral must be made to the San Francisco Airport Land Use Commission (ALUC) for a consistency determination. The determination of consistency of the project with the ALUCP considers issues such as general compatibility, safety, height, and noise. Given that implementation of the project would include certain qualifying land use actions, including *San Bruno General Plan* amendments, the project would be required to be referred to the ALUC for a determination of consistency with the relevant policies of the 2012 SFO ALUCP regarding safety, height, and noise.

Safety. As noted previously and depicted in Figure 3.7-1, the majority of the project site is located within Zone 4, the Outer Approach/Departure Zone. ALUCP Policy SP-2 and Table IV-2 define incompatible uses within each Safety Compatibility Zone. Incompatible uses for Zone 4 include: Biosafety Level 3 and 4 facilities[12], children's schools, large child day care centers, hospitals, nursing homes, stadiums, arenas. Uses to avoid in Zone 4 include: hazardous uses (other than Biosafety Level 3 and 4 facilities), and critical public utilities (C/CAG 2012).[13] ALUCP Policy SP-3 further defines hazardous uses and materials of particular concern identified in Table IV-2 of the ALUCP as aboveground fuel storage, facilities where toxic substances are manufactured, processed or stored, explosives and fireworks manufacturing and storage, and medical and biological research facilities handling highly toxic or infectious agents, which are classified by Biosafety Levels.[14] The project would allow for the development of life-science laboratory uses, with up to 1,792,580 square feet of life-science uses developed under Scenario A. It is anticipated that the project could accommodate Biosafety Level 1, Biosafety Level 2[15], and/or Biosafety Level 3 facilities. However, as detailed in Chapter 2, *Project Description*, and Section 3.7, *Hazards and Hazardous Materials*, as a requirement of the of the project's P-D zoning, proposed life-sciences laboratory uses with Biosafety Level 3 facilities would not be allowed in the portion of the project site that is within Safety Zone 4, and Level 4 facilities would be prohibited. In addition, any proposed Biosafety Level 2 facilities on the

[12] Biosafety Level 3 and 4 facilities are medical and biological research facilities involving the storage and processing of extremely toxic or infectious agents (City/County Association of Governments of San Mateo County 2012).

[13] As defined in Table IV-2 of the ALUCP, uses to avoid include uses that are not fully compatible and should not be permitted unless no feasible alternative is available. Where the use is allowed, habitable structures shall be provided with at least 50 percent more exits than required by applicable codes.

[14] Biosafety Level 1 facilities do not involve the use of hazardous materials and are therefore not subject to the restrictions on hazardous uses as identified in Table IV-2 of the ALUCP.

[15] Per ALUCP Policy SP-3, Biosafety Level 2 practices, equipment, and facility design and construction are applicable to clinical, diagnostic, teaching, and other laboratories in which work is done with the broad spectrum of indigenous moderate-risk agents that are present in the community and associated with human disease of varying severity.

project site within Safety Zone 4 would provide at least 50 percent more exits than required by applicable building codes per the requirements outlined in the ALUCP. Furthermore, children's schools, large child day care centers, hospitals (including nursing homes), stadiums or arenas, other hazardous uses (not including Biosafety Level 2 facilities), and critical public utilities would be prohibited within the portion of the project site in Safety Zone 4 as required by the ALUCP and enforced through the project's P-D zoning. As such, the project would be consistent with safety compatibility policies.

Height limitations. As noted above, the project site falls within a 125 to 145 feet AMSL contour per SFO's critical aeronautical surfaces map. Given existing elevations at the project site range from 33 to 66 feet AMSL, the heights of the proposed buildings on the project site could be no higher than approximately 55 and 90 feet above ground level pursuant to FAA and ALUCP regulations. As described in Chapter 2, *Project Description*, proposed building heights would be 1 to 7 stories or approximately 20 to 80 feet above ground level, depending on the location within the project site. In addition, as detailed in Section 3.7, *Hazards and Hazardous Materials*, the use of construction equipment (such as building cranes) or the construction of buildings with heights in excess of 55 feet above ground level could pose a safety hazard to construction workers and future residents. However, the proposed project would implement **Mitigation Measure HAZ-5**, which would require the applicant to submit a plan with a list of equipment to be used during construction that includes their height and proposed area of operation to the City for review and approval. The mitigation measure also requires compliance with SFO building height requirements. Furthermore, notification and consultation with the FAA under CFR Part 77.9 and subsequent determination of no hazard to air navigation would be required for implementation of the proposed project. Therefore, with implementation of **Mitigation Measure HAZ-5**, the proposed project would be compliant with FAA and ALUCP regulations, and would ensure that the project does not result in new buildings that exceed applicable ALUCP building height limits. The proposed project would be consistent with the height clearances established in the ALUCP.

Noise. As discussed in Section 3.9.2.1, *Regulatory Setting*, the ALUCP also includes CNEL noise contours, which designate areas where noise exposure is high enough to warrant land use controls to promote noise compatibility. As shown in Figure 3.10-2 in Section 3.10, *Noise*, the project site falls within the 70dB CNEL noise contour. ALCUP Policy NP-4 establishes criteria to determine the compatibility of proposed land uses in the Airport Noise Compatibility Zones, and states that residential uses are incompatible with noise levels above 70 dB.

The project proposes residential uses, and as such, would be inconsistent with the ALUCP's noise policies. Refer to Section 3.10, *Noise*, for a detailed analysis of the project's consistency with SFO's ALUCP noise policies. As the proposed project would be inconsistent with the ALUCP's noise compatibility policies, the project would be expected to receive a determination of inconsistency from ALUC and require a Local Agency Override by the San Bruno City Council. As discussed in Chapter 2, *Project Description*, the anticipated Local Agency Override is included as a discretionary approval for the project, the potential environmental effects of which are evaluated throughout this EIR. As detailed in Section 3.10, *Noise*, the Housing Element IS/MND determined that residential uses on the project site would be able to achieve interior noise levels of 45 dB CNEL through compliance with general plan policies and Title 24. Nonetheless, to ensure that interior noise levels are reduced to 45 dB CNEL or lower, the use of special building materials that provide a greater level of sound attenuation may be required; the details of such building materials for the project are not known at this time. Accordingly, the project could result in significant noise impacts on proposed residential uses inconsistent with ALUCP policies. However, the proposed project would be required

to implement **Mitigation Measure NOI-3**, which would require the project applicant to retain an acoustical engineer to conduct a noise analysis and provide a noise reduction plan for the proposed residential uses that would determine the treatments and measures necessary to ensure that interior noise levels would be 45 dB CNEL or lower. Therefore, with implementation of **Mitigation Measure NOI-3**, the proposed project's inconsistency with the noise compatibility policies provided in the ALUCP would not result in a significant effect on the proposed residential uses on the project site.

Conclusion. As detailed above, the project would be consistent with the ALUCP's policies regarding safety, and heights (with implementation of **Mitigation Measure HAZ-5**), and inconsistent with policies regarding noise. As described in more detail in Section 3.10, *Noise*, while the project would result in inconsistencies with ALUCP noise compatibility policies, requiring a Local Agency Override, the inconsistencies themselves would not result in significant impacts on the environment with implementation of **Mitigation Measure NOI-3**. Therefore, the land use impact with respect to ALUCP's policies would be ***less-than-significant with mitigation***.

BART Station Access Policy

While development within the project site would not be subject to specific policies identified in the 2016 BART Station Access Policy, the proposed off-site circulation improvements that are located within BART jurisdiction would require certain BART construction approvals pursuant to its applicable policies, including the 2016 BART Station Access Policy. The proposed off-site circulation improvements would support the goals and strategies identified in the 2016 BART Station Access Policy. Specifically, pedestrian access to the San Bruno BART station would be improved at Sneath Lane and Huntington Avenue by reducing crossing distances, increasing median widths to provide a pedestrian refuge, implementing leading pedestrian intervals, and accommodating bikeway crossings. The project would also create new bicycle access to the BART station through the internal project site circulation network. Improvements may also include improved crossings on Sneath Lane and El Camino Real, the construction of a two-way cycle track on the south side of Sneath Lane, and connections to the City's planned two-way cycle track on Huntington Avenue.

These off-site improvements would directly support the BART Station Access Policy goal to provide a "Better Experience,… including the first and last mile of the trip to and from BART stations," and the strategy of "Invest and Implement – Invest in the pedestrian and bicycle network, on and off BART property; invest in transit connections… and; invest in strategic parking resources." Therefore, impacts of the proposed project related to conflicts with the 2016 BART Station Access Policy would be ***less than significant***.

City of San Bruno General Plan

Land Use Designations. The project includes amendments to the *San Bruno General Plan* to ensure the project is consistent with the general plan. As stated above, the southern portion of the main project site is designated as Regional Commercial, with the northern portion of the main project site and the parcel north of Sneath Lane designated as Transit-Oriented Development under the general plan. The proposed project would require a general plan Amendment to amend the land use designation for the southern portion of the main project site to Transit-Oriented Development consistent with the designation of the remaining portion of the project site.

The proposed *San Bruno General Plan* Amendment would meet the overall intent of the land use policies as described in detail below and in Table 3.9-1. Given that the project is generally consistent with the general plan's goals for the project site, as evaluated below, and includes provisions to update the general plan and Zoning Ordinance consistent with state law to achieve consistency as discussed above, impacts from implementation of the project related to conflicts with local plans and regulations adopted for the purpose of avoiding or mitigating an environmental effect would be ***less than significant***.

Goals and Policies. Table 3.9-1 outlines the general plan and Housing Element goals and policies that have been identified as applicable to the project and adopted for the purpose of avoiding or mitigating an environmental effect, and describes environmental effects of the project. Table 3.9-1 includes a determination of "Consistent" or "Inconsistent" for each policy. The determination of whether the project would conflict with applicable policies is based on the environmental analysis provided in the applicable resource sections of this Draft EIR. For policies found to be potentially inconsistent, the table then identifies the environmental effects for the project, and potential mitigation measures.

As described in Table 3.9-1, the project was found to be consistent with the Land Use and Urban Design, Economic Development, Transportation, Open Space and Recreation, Public Facilities and Services, and Housing Elements of the *San Bruno General Plan*. The project's compatibility with the Environmental Resources and Conservation, and Health and Safety Elements was determined to be consistent with mitigation. Table 3.9-1 shows some inconsistencies with the general plan. However, these inconsistencies are either not associated with any negative environmental impact under CEQA or would be resolved with appropriate mitigation measures. The project would thus be consistent with the majority of applicable goals, policies, and actions, resulting in a ***less-than-significant impact***.

San Bruno Transit Corridors Plan

As described above, the Transit Corridors Plan applies to the segment of El Camino Real between Interstate 380 and Crystal Springs Road, San Mateo Avenue between Interstate 380 and El Camino Real, San Bruno Avenue between Highway 101 and Acacia Avenue, and Huntington Avenue between San Bruno Avenue and the San Bruno BART Station. Therefore, only project-related improvements that could occur along Huntington Avenue would overlap with the Transit Corridors Plan Area. As discussed in Chapter 2, *Project Description*, the project would incorporate several off-site improvements that would directly implement the public realm design guidelines identified the City of San Bruno's Transit Corridors Plan for the segment of Huntington Avenue adjacent to the project site. Specifically, the project would upgrade lane configuration and signal phasing at the Huntington Avenue/Maple Avenue intersection. At the Huntington Avenue/E Street intersection, the project would implement pedestrian intervals and install pedestrian refugee islands and protected bicycles spaces. The project would not interfere with the implementation of the policies described in the San Bruno Transit Corridors Plan, and would fulfill the vision of the Transit Corridors Plan to enhance the pedestrian environment along the Transit Corridors Area's key roadways, as well as within its public open spaces, facilitating a balance between the needs of transit, automobiles, bicyclists, and pedestrians, including those with disabilities. Impacts due to conflicts with the San Bruno Transit Corridors Plan would be ***less than significant***.

City of San Bruno Walk 'n Bike Plan

The project would break up the project site with pedestrian-scale streets and blocks. All internal streets, except D Street, would have pedestrian sidewalk, crosswalk, and lighting improvements and create environments that encourage walking. On El Camino Real, the project may add a crosswalk to the southern leg of El Camino Real. The project would install leading pedestrian intervals with all signals at project entry and exit points. At crossings that have longer crossing distances, the project would add pedestrian refuge islands.

The project would make substantial improvements to the bicycle circulation network within the project site and would contribute to low-stress options for getting to and from the site from the surrounding network. The project includes bicycle facilities on Seabiscuit, B Street, and C Street, including connections through the roundabout and along a stretch of Tanforan Way. These facilities would connect to the external network through key improvements at the gateway intersections and along Sneath Lane, which would serve as the only complete east–west bicycle travel option north of I-380.

On El Camino Real, the project would add bicycle markings connecting Commodore Drive and Tanforan Way. On Sneath Lane, the project would replace the one-block Class II bicycle lane with a more appropriate bicycle facility for the number of lanes and vehicle volumes on Sneath Lane, accounting for completion of the project. The current design provided in the City's Walk 'n Bike Plan includes a two-way cycle track on the south side of Sneath Lane for the full length of Sneath between El Camino Real and Huntington Avenue. On Huntington Avenue, the project would connect to the City's planned two-way cycle track on the east side of the street by constructing a protected intersection at either E Street or C Street, depending on the final project design.

These improvements incorporated as part of the project would be consistent with the Walk 'n Bike Plan's overarching goals of making "walking and biking in San Bruno safer and easier for both transportation and recreation," as well as the specific goals of reducing safety risks to pedestrians and cyclists, making walking conditions more pleasant, and implementing a citywide network of designated bikeways that improve connectivity to major transit hubs and employment centers.

As the project would incorporate mobility improvements that support the goals and objectives of the Walk 'n Bike Plan, and does not contain any development or improvements that would interfere with the implementation of the goals or projects described in the Walk 'n Bike Plan, impacts due to conflicts with the Walk 'n Bike Plan would be ***less than significant***.

Grand Boulevard Initiative

Consistent with the principles of the Grand Boulevard Initiative of encouraging compact mixed-use development and creating a pedestrian-oriented environment with improved streetscapes and access to public and private open spaces, the proposed project would develop the existing Tanforan Mall into a transit-oriented, mixed-use development with residential, retail, life-science laboratory, and office uses, as well as private and public open spaces along El Camino Real. The proposed project would incorporate environmentally sustainable measures such as on-site renewable energy resources, like photovoltaic systems, on parking garages and other large structures throughout the site, and would incorporate increased energy efficiency measures into building designs that would exceed the California energy efficiency standards (i.e., Title 24) consistent with the Grand Boulevard Initiative principle of pursuing environmentally sustainable development patterns. Furthermore, the project would also be consistent with the Grand Boulevard principle of strengthening pedestrian

and bicycle connections within the El Camino Real corridor by incorporating pedestrian, bicyclist, and streetscape improvements throughout the project site that would provide improved connections along El Camino Real as well as to the adjacent San Bruno BART station. Therefore, impacts of the proposed project related to conflicts with the Grand Boulevard Initiative would be ***less than significant***.

City of San Bruno Zoning Ordinance (Title 12 of the San Bruno Municipal Code)

Zoning codes generally are not considered to be plans or policies adopted for the purpose of avoiding or mitigating an environmental effect. Rather, zoning codes control how land within a jurisdiction can be used, ensuring orderly development, protecting property values, and promoting the health, wellbeing, and safety of residents. Therefore, the following discussion of the project's consistency with the San Bruno Zoning Ordinance is provided for informational purposes and not as a basis for determining impacts under CEQA.

As stated above, the main project site and the parcel north of Sneath Lane are currently designated as P-D under the City's Zoning Code. The P-D zoning district allows a mixture of uses, or unusual density, building intensity, or design relationships which will produce an environment and use of land in each case superior to that which would result from the regulations of the standard districts or combination of districts. All uses within this district are conditional uses, therefore any and all compatible land uses consistent with the City's General Plan are conditional uses in a P-D district, provided such use or uses have been designated on a development plan and approved by the planning commission and city council pursuant to the provisions of this section. Conditional uses may be authorized by the approval of a planned development permit.

The existing P-D zoning district on the project site was established in 1966 under Ordinance No. 1087 to allow for the existing mall uses currently on the site. As discussed above, as part of implementing the Housing Element Update, the City amended the P-D zoning district to extend it to the parcel north of Sneath Lane and allow for multifamily residential uses (Ordinance Nos. 1954 and 1955, adopted by the San Bruno City Council on September 10, 2024).

As described in Chapter 2, *Project Description*, the project proposes the development of a mix of life-science laboratory, office, amenity, multifamily residential, retail, and hotel uses. The proposed project would require zoning amendments to reconcile inconsistencies between the current P-D zoning designation and the proposed project. The zoning amendment and planned development permit would allow for the types of uses proposed by the project, up to the densities studied in this EIR. The zoning amendment would allow multifamily housing densities at a minimum of 75 dwelling units per acre and a maximum number of 1,514 units in planning areas that allow residential uses. The proposed combined floor area ratio (FAR) maximum for all uses and planning areas within the P-D zoning district would be 4.5. Therefore, given that the project includes provisions to update the P-D zoning designation, consistent with state law, to ensure consistency with the proposed development, the project would not conflict with the City of San Bruno Zoning Ordinance.

City Ordinance No. 1446

As discussed in Chapter 2, *Project Description*, the project would be subject to the height restrictions and limitations imposed by Ordinance No. 1446. Proposed building heights would range from 1 to 7 stories (20 feet to 79 feet, 7 inches), with varying floor-to-floor heights, and building maximum heights within the City's height limit maximum of 79 feet 7 inches measured from grade, and the SFO-adopted safety height limits of 125 feet to 145 feet measured from AMSL, as defined from the origin of the North American Vertical Datum of 1988 (NAVD88). Given the project is consistent with the development restrictions imposed by Ordinance 1446, impacts due to conflicts with this ordinance would be ***less than significant***.

Conclusion

The project was evaluated for consistency with regional plans adopted for the purpose of avoiding or mitigating an environmental effect, including Plan Bay Area 2050, SFO's ALUCP, and BART's Station Access Policy. Potential impacts associated with inconsistency with Plan Bay Area 2050 were found to be less than significant because the project supports several of the Plan Bay Area 2050's key objectives, including fostering compact development and jobs in proximity to transit, focusing growth within a PDA, supporting pedestrian- and bicycle-friendly streets, and opening up new opportunities for housing, while remaining consistent with ABAG's population projections for the region. The project was found to be consistent with the ALUCP's policies regarding safety, heights (with implementation of **Mitigation Measure HAZ-5**), and notification, and inconsistent with policies regarding noise. As described above, and in more detail in Section 3.10, *Noise*, while the project would result in inconsistencies with ALUCP noise compatibility policies, the inconsistencies themselves would not result in significant impacts on the environment with implementation of **Mitigation Measure NOI-3**. The project's potential impacts regarding inconsistency with the ALUCP's policies were thus found to be less than significant with mitigation. The project would improve pedestrian and bicycle access to the San Bruno BART station, and would be consistent with BART's Station Access Policy.

The project was evaluated for consistency with local plans and regulations adopted for the purpose of avoiding or mitigating an environmental effect, including the San Bruno General Plan, Transit Corridors Plan, Walk 'N Bike Plan, Grand Boulevard Initiative, and City Ordinance 1446. The project would be generally consistent with the goals, policies, and actions of the general plan. Proposed improvements in the Huntington Avenue corridor would be consistent with the Transit Corridors Plan. The project includes mobility and parking improvements that align with the Walk 'n Bike Plan and would improve the safety, convenience, and comfort of walking and biking across San Bruno. The project would be consistent with the Grand Boulevard principle of strengthening pedestrian and bicycle connections within the El Camino Real corridor by incorporating pedestrian, bicyclist, and streetscape improvements throughout the project site that would provide improved connections along El Camino Real as well as to the adjacent San Bruno BART station. The project would comply with the height and other requirements of City Ordinance No. 1446.

Overall, with implementation of mitigation measures, the project would be consistent with regional and local plans adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would be ***less than significant with mitigation***.

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3.10 Noise and Vibration

3.10.1 Introduction

This section evaluates the potential impacts related to noise and vibration that could result from construction and operation of the Tanforan Redevelopment Project (project). This section also describes existing conditions at the project site, as well as the regulatory framework for this analysis. Feasible mitigation measures, where applicable, are also described.

Relevant technical documentation used in this analysis includes noise modeling files and other data are included in Appendix 3.10-1, *Noise Technical Appendix*.

Issues identified in response to the Notice of Preparation (NOP) (Appendix 1-1, *Notice of Preparation and Comments Received on the Notice of Preparation*) were considered in preparing this analysis. The NOP comments pertaining to noise were related to aircraft noise and potential conflicts with policies from the Airport Land Use Compatibility Plan (ALUCP) for San Francisco International Airport (SFO); a request to discuss ALUCP policies in the context of the project; a request to include an alternative that does not include any residential uses due to the location of the site within the 70 A-weighted decibel (dBA) Community Noise Equivalent Level (CNEL) contour for SFO; a request to identify mitigation measures to address noise impacts related to aircraft noise; concerns pertaining to future aircraft noise complaints by future project residents, and; a request to analyze potential traffic noise impacts resulting from project implementation. These issues are considered below in Section 3.10.4.4, *Impacts and Mitigation Measures*, under **Impact NOI-1b** and **Impact NOI-3**.

3.10.1.1 Overview of Noise and Sound

Noise is commonly defined as unwanted sound that annoys or disturbs people and potentially causes an adverse psychological or physiological effect on human health. Because noise is an environmental pollutant that can interfere with human activities, the California Environmental Quality Act (CEQA) requires an evaluation of noise when considering the environmental impacts of a project.

Sound is mechanical energy (vibration) transmitted by pressure waves over a medium such as air or water. Sound is characterized by various parameters, including the rate of oscillation of sound waves (frequency), the speed of propagation, and the pressure level or energy content (amplitude). The sound pressure level is the most common descriptor for characterizing the loudness of an ambient (existing) sound level. The decibel (dB) scale, which is a logarithmic scale, is used to quantify sound intensity, with 0 dB corresponding roughly to the threshold of hearing; however, the dB scale does not accurately describe how sound intensity is perceived by human hearing. The human ear is not equally sensitive to all frequencies in the entire spectrum. Therefore, noise measurements are weighted more heavily toward the frequencies to which humans are sensitive in a process called A-weighting, written as dBA and referred to as A-weighted decibels. Table 3.10-1 defines sound measurements and other terminology used in this chapter, and Table 3.10-2 summarizes typical A-weighted sound levels for different noise sources.

Table 3.10-1. Definition of Sound Measurements

Sound Measurements	Definition
Decibel (dB)	A unitless measure of sound on a logarithmic scale that indicates the squared ratio of sound pressure amplitude with respect to a reference sound pressure amplitude. The reference pressure is 20 micropascals.
A-Weighted Decibel (dBA)	An overall frequency-weighted sound level in decibels that approximates the frequency response of the human ear.
C-Weighted Decibel (dBC)	The sound pressure level in decibels measured using the C-weighting filter network. C-weighting is very close to an unweighted or *flat* response. C-weighting is used only in special cases (i.e., when low-frequency noise is of particular importance). A comparison of the measured A- and C-weighted level gives an indication of low-frequency content.
Maximum Sound Level (L_{max})	The maximum sound level measured during the measurement period.
Minimum Sound Level (L_{min})	The minimum sound level measured during the measurement period.
Equivalent Sound Level (L_{eq})	The equivalent steady-state sound level that in a stated period of time would contain the same acoustical energy.
Percentile-Exceeded Sound Level (L_{xx})	The sound level exceeded X% of a specific time period. L_{10} is the sound level exceeded 10% of the time, and L_{90} is the sound level exceeded 90% of the time. L_{90} is often considered to be representative of the background noise level in a given area.
Day-Night Level (L_{dn})	The energy average of the A-weighted sound levels occurring during a 24-hour period, with 10 dB added to the A-weighted sound levels occurring during the period from 10:00 p.m. to 7:00 a.m.
Community Noise Equivalent Level (CNEL)	The energy average of the A-weighted sound levels occurring during a 24hour period, with 5 dB added to the A-weighted sound levels occurring during the period from 7:00 p.m. to 10:00 p.m. and 10 dB added to the A-weighted sound levels occurring during the period from 10:00 p.m. to 7:00 a.m.
Ambient Noise Level	The all-encompassing composite of noise (from all sources near and far) associated with a given environment. The normal or existing level of environmental noise at a given location.
Vibration Velocity Level (or Vibration Decibel Level, VdB)	The root-mean-square velocity amplitude for measured ground motion, expressed in dB.
Peak Particle Velocity (Peak Velocity or PPV)	A measurement of ground vibration, defined as the maximum speed (measured in inches per second) at which a particle in the ground is moving relative to its inactive state. PPV is usually expressed in inches per second (in/sec).
Frequency: Hertz (Hz)	The number of complete pressure fluctuations per second above and below atmospheric pressure.

Table 3.10-2. Typical A-weighted Sound Levels

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
	—110—	Rock band
Jet flyover at 1,000 feet		
	—100—	
Gas lawnmower at 3 feet		
	—90—	
Diesel truck at 50 feet at 50 mph		Food blender at 3 feet
	—80—	Garbage disposal at 3 feet
Noisy urban area, daytime		
Gas lawnmower at 100 feet	—70—	Vacuum cleaner at 10 feet
Commercial area		Normal speech at 3 feet
Heavy traffic at 300 feet	—60—	
		Large business office
Quiet urban daytime	—50—	Dishwasher in next room
Quiet urban nighttime	—40—	Theater, large conference room (background)
Quiet suburban nighttime		
	—30—	Library
Quiet rural nighttime		Bedroom at night, concert hall (background)
	—20—	
		Broadcast/recording studio
	—10—	
	—0—	

Source: Federal Transit Administration. 2018. *Transit Noise and Vibration Impact Assessment.* FTA Report 0123. Available: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf. Accessed: March 7, 2025.

In general, human sound perception is such that a change in sound level of 1 dB cannot typically be perceived by the human ear, a change of 3 dB is barely noticeable, a change of 5 dB is clearly noticeable, and a change of 10 dB is perceived as doubling or halving the sound level as it increases or decreases, respectively.

Different types of measurement metrics are used to characterize the time-varying nature of sound. These measurement metrics include the equivalent sound level (L_{eq}), the minimum and maximum sound levels (L_{min} and L_{max}), percentile-exceeded sound levels (such as L_{10}, L_{20}), the day-night sound level (L_{dn}), and the CNEL. L_{dn} and CNEL include penalties for noise that occurs during evening or nighttime hours, as described in Table 3.10-1, and the CNEL and L_{dn} values generally differ by less than 1 dB. As a matter of practice, L_{dn} and CNEL values are considered to be equivalent and are treated as such. Measurement metrics are defined more thoroughly in Table 3.10-1.

A receptor's distance from a noise source affects how noise levels attenuate (i.e., how noise levels decrease). Point sources of noise, such as stationary equipment or construction equipment, typically attenuate at a rate of 6.0 to 7.5 dBA per doubling of distance from the source, depending on the intervening surface (US HUD 1985).[1] Transportation noise sources tend to be arranged linearly such that roadway traffic attenuates at a rate of 3.0 to 4.5 dBA per doubling of distance from the source (Caltrans 2020), depending on the intervening surface (paved or vegetated, respectively). For example, a sound level of 80 dBA at 50 feet from the noise source will be reduced to 74 dBA at 100 feet, 68 dBA at 200 feet, and so on, based on the 6 dB point-source reduction over a non-absorptive surface (e.g., pavement instead of vegetation). Noise levels can also be attenuated by "shielding" or providing a barrier between the source and the receptor. With respect to interior noise levels, noise attenuation effectiveness depends on whether windows are closed or open. Based on the U.S. Environmental Protection Agency (EPA) national average, closed windows reduce noise levels by approximately 25 dBA, and open windows reduce noise levels by about 15 dBA (EPA 1974).

Atmospheric conditions, including wind, temperature gradients, and humidity, can change how sound propagates over distance and can affect the level of sound received at a given location. The degree to which the ground surface absorbs acoustical energy also affects sound propagation. Sound that travels over an acoustically absorptive surface, such as grass, attenuates at a greater rate than sound that travels over a hard surface such as pavement. The increased attenuation is typically in the range of 1 to 2 dB per doubling of distance. Barriers such as buildings or topographic features that block the line-of-sight between a source and receiver also increase the attenuation of sound over distance.

Community noise environments are generally perceived as quiet when the 24-hour average noise level is below 45 dBA CNEL, moderate in the 45 to 60 dBA CNEL range, and loud above 60 dBA CNEL. Very noisy urban residential areas are usually around 70 dBA CNEL. Along major thoroughfares, roadside noise levels are typically between 65 and 75 dBA CNEL. Incremental changes of 3 to 5 dB in the existing 1-hour L_{eq}, or the CNEL, are commonly used as thresholds for an adverse community reaction to a noise increase (FTA 2018). Noise intrusions that cause short-term interior noise levels to rise above 45 dBA at night can disrupt sleep. Exposure to noise levels greater than 85 dBA for 8 hours or longer can cause permanent hearing damage.

Noise from Multiple Sources

Because sound pressure levels in decibels are based on a logarithmic scale, they cannot be added or subtracted in the usual arithmetical way. Adding a new noise source to an existing noise source, with both producing noise at the same level, will not double the noise level. If the difference between two noise sources is 10 dBA or more, the higher noise source will dominate, and the resultant noise level will be equal to the noise level of the higher noise source. In general, if the difference between two noise sources is 0 to 1 dBA, the resultant noise level will be 3 dBA higher than the higher noise source, or both sources if they are equal. If the difference between two noise sources is 2 to 3 dBA, the resultant noise level will be 2 dBA above the higher noise source. If the difference between two noise sources is 4 to 10 dBA, the resultant noise level will be 1 dBA higher than the higher noise source.

[1] The 1.5 dBA variation in attenuation rate (6 dBA vs. 7.5 dBA) can result from ground-absorption effects, which occur as sound travels over soft surfaces such as soft earth or vegetation (7.5 dBA attenuation rate) versus hard surfaces such as pavement or very hard-packed earth (6 dBA rate)

Noise-Sensitive Land Uses

Noise-sensitive land uses are generally defined as locations where people reside or where the presence of unwanted sound could adversely affect the use of the land. Noise-sensitive land uses typically may include but are not limited to single- and multi-family residential areas, health care facilities, churches, lodging facilities, and schools. Noise-sensitive land uses where people typically sleep are generally considered to be more sensitive to noise during nighttime hours (when people are commonly sleeping).

3.10.1.2 Overview of Groundborne Vibration

Ground vibration consists of rapidly fluctuating motions or waves with an average motion of zero. Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. Several different methods are typically used to quantify vibration amplitude: one is peak particle velocity (PPV); another is root-mean-square (RMS) velocity. PPV is defined as the maximum instantaneous positive or negative peak of the vibration wave. RMS velocity is defined as the average of the squared amplitude of the signal. Vibration is typically measured in inches per second or millimeters per second.

Operation of heavy construction equipment, particularly pile-driving equipment and other impact devices (e.g., pavement breakers), creates seismic waves that radiate along the surface of and downward into the ground. These surface waves can be felt as ground vibration. Vibration from the operation of this type of equipment can result in effects that range from annoyance for people to damage of structures. Variations in geology and distance result in different vibration levels, including different frequencies and displacements. In all cases, vibration amplitudes decrease with increased distance.

Perceptible groundborne vibration is generally limited to areas within a few hundred feet of construction activities, or less. As seismic waves travel outward from a vibration source, they cause rock and soil particles to oscillate. The actual distance that these particles move is usually only a few ten thousandths- to a few thousandths of an inch. The rate or velocity (in inches per second) at which these particles move is the commonly accepted descriptor of vibration amplitude, referred to as PPV.

The vibration amplitude attenuating over distance is a complex function of how energy is imparted into the ground and the soil or rock conditions through which the vibration is traveling. The following equation is used to estimate the PPV vibration level at a given distance for typical soil conditions (FTA 2018):

$$PPV = PPV_{ref} \times (25/Distance)^{1.5}$$

PPV_{ref} is the reference PPV at 25 feet (Refer to Table 3.10-3 for reference PPV levels for equipment).

Construction Vibration

Construction activities can cause vibration that varies in intensity depending on several factors. The use of pile-driving, excavation equipment and vibratory compaction equipment typically generates the highest construction-related groundborne vibration levels. The activities that are typical of single-impact (transient) or low-rate, repeated impact vibration include blasting and the use of drop balls, impact pile drivers, "pogo-stick" compactors, and crack-and-seat equipment (FTA 2018). Typically, groundborne vibration generated by human activities attenuates rapidly with distance from the source of the vibration. In general, such vibration is only an issue when sensitive receptors are located in proximity. Since rubber tires provide vibration isolation, rubber-tire vehicles (i.e., heavy trucks) rarely create substantial groundborne vibration effects unless there is a discontinuity or bump in the road that causes the vibration. The PPV descriptor is the most common measure of construction vibration. Table 3.10-3 summarizes typical vibration levels generated by construction equipment at a reference distance of 25 feet and other distances, as determined with use of the attenuation equation (Caltrans 2020). Tables 3.10-4 and 3.10-5, summarize the guidelines developed by the California Department of Transportation (Caltrans) for annoyance and damage potential from the transient and continuous vibration that is usually associated with construction activity.

With the exception of long-term occupational exposure, vibration levels rarely affect human health. Instead, most people consider vibration to be an annoyance that can affect concentration or disturb sleep or interfere with activities. Human perception to vibration varies with the individual and is a function of physical setting and the type of vibration. Vibration may be found to be annoying at lower levels than those shown in Table 3.10-4, depending on the level of activity or the sensitivity of the individual. To sensitive individuals, vibrations approaching the threshold of perception can be annoying. On the other hand, persons exposed to elevated ambient vibration levels such as people in an urban environment may tolerate a higher vibration level. People may tolerate infrequent, short-duration vibration levels, but human annoyance to vibration becomes more pronounced if the vibration is continuous or occurs frequently. As shown in Table 3.10-5, high levels of vibration can damage to fragile buildings or interfere with sensitive equipment. Depending on the age of the structure and type of vibration (transient, continuous, or frequent intermittent sources), vibration levels as low as 0.5 to 2.0 PPV inches per second (in/sec) can damage a structure.

Table 3.10-3. Vibration Source Levels for Construction Equipment

Equipment	PPV at 25 Feet	PPV at 50 Feet	PPV at 75 Feet	PPV at 100 Feet
Vibratory roller	0.210	0.074	0.040	0.026
Auger drill	0.089	0.031	0.017	0.011
Large bulldozer	0.089	0.031	0.017	0.011
Loaded trucks	0.076	0.027	0.015	0.010
Small bulldozer	0.003	0.001	0.001	0.000

Source: FTA 2018.

Table 3.10-4. Vibration Annoyance Potential Criteria Guidelines

	Maximum PPV (inches per second)	
Human Response	**Transient Sources [a]**	**Continuous/Frequent Intermittent Sources**
Barely perceptible	0.04	0.01
Distinctly perceptible	0.25	0.04
Strongly perceptible	0.90	0.10
Severe	2.0	0.40

Source: Caltrans 2020.

[a] Transient sources create a single, isolated vibration event (e.g., blasting or the use of drop balls). Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

Table 3.10-5. Vibration Damage Potential Threshold Criteria Guidelines

	Maximum PPV (inches per second)	
Structure and Condition	**Transient Sources [a]**	**Continuous/Frequent Intermittent Sources**
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.10
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.30
New residential structures	1.0	0.50
Modern industrial/commercial buildings	2.0	0.50

Source: Caltrans 2020.

[a] Transient sources create a single, isolated vibration event (e.g., blasting or the use of drop balls). Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

3.10.2 Existing Conditions

3.10.2.1 Regulatory Setting

This section provides a summary of noise and vibration plans and policies that are relevant to the project. Federal, state, and regional and local agencies regulate different aspects of environmental noise. Generally, the federal government sets noise standards for transportation-related noise sources that are closely linked to interstate commerce. These sources include aircraft, locomotives, and trucks. The state government sets noise standards for transportation noise sources such as automobiles, light trucks, and motorcycles. Noise sources associated with industrial, commercial, and construction activities are generally subject to regional and local control through noise ordinances and general plan policies. Local general plans provide principles that are intended to guide and influence development plans.

Federal

No federal laws, regulations, or policies apply directly to the project.

State

California Code of Regulations, Title 24

The California Noise Insulation Standards found in the California Code of Regulations, Title 24 Section 1207.4, establish uniform minimum noise insulation performance standards to protect persons within new buildings housing people, including hotels, motels, dormitories, apartments, and dwellings other than single-family residences. Title 24 mandates that interior noise levels attributable to exterior sources do not exceed 45 L_{dn}/CNEL in any habitable room.

California Governor's Office of Planning and Research

The *State of California General Plan Guidelines*, published and updated by the Governor's Office of Planning and Research, provides guidelines for evaluating the compatibility of various land uses as a function of community noise exposure (OPR 2017). These are guidelines for general land use planning that describe noise acceptability categories for different types of land uses considered by the state. California also requires each local government entity to perform noise studies and implement a noise element as part of its general plan. The purpose of the noise element is to limit the exposure of the community to excessive noise levels; the noise element must be used to guide decisions concerning land use.

California Department of Transportation

Caltrans provides guidelines regarding vibration associated with construction and operation of transportation infrastructure. Although Caltrans guidelines are typically applicable to the transit projects in California, they are very commonly used as vibration thresholds for development projects because most local agencies and jurisdictions do not have vibration-specific thresholds. Table 3.10-4 provides Caltrans' vibration guidelines for vibration annoyance potential, and Table 3.10-5 provides Caltrans' guidelines related to potential vibration-induced damage to different types of structures.

Regional and Local

Comprehensive Airport Land Use Compatibility Plan for San Francisco International Airport

The SFO ALUCP, prepared by the City/County Association of Governments (C/CAG), is a state-mandated land use compatibility plan that addresses the compatibility of surrounding land uses in local jurisdictions with airport operations (C/CAG 2012). The ALUCP was adopted in 2012 and was developed to align with the guidance provided by the U.S. Department of Transportation, Division of Aeronautics, and Federal Aviation Administration. Its purpose is to establish planning boundaries around SFO that define noise for policy implementation and require notification of SFO proximity in real estate transactions (C/CAG 2012). Airport and aircraft operations' noise is a significant concern for airport land use commissions, particularly in densely populated regions like the Bay Area. Noise compatibility policies described within the ALUCP are intended to minimize the exposure of residents and occupants of future noise-sensitive development to excessive noise. CNEL noise contours identify areas where noise exposure is great enough to warrant land use controls to promote noise compatibility. The ALUCP includes forecasted 2015 and 2020 CNEL noise contours.

Policy NP-2, Airport/Land Use Compatibility Criteria, from this plan establishes criteria to determine the compatibility of proposed land uses in the Airport Noise Compatibility Zones.

Residential uses are compatible with noise levels below 65 dB, conditionally compatible with noise levels between 65 and 70 dB, and generally incompatible with noise levels in excess of 70 dB. Per ALUCP Policy NP-4.1, residential uses are considered conditionally compatible in areas with existing noise levels in the 70 to 75 dB CNEL range only if the proposed use is on a lot of record zoned for residential use as of the effective date of the ALUCP. Residential uses are considered incompatible (1) in areas within the 70 to 75 dB CNEL noise contour if they were not zoned for residential use when the ALUCP went into effect, or (2) if they are located in a 75 dB CNEL or greater noise contour. In addition, per ALUCP Policy NP-3, any action that would either permit or result in the development or construction of a land use considered to be conditionally compatible with aircraft noise of CNEL 65 dB or greater shall require the submittal of an avigation easement to the airport (C/CAG 2012).

San City of Bruno General Plan

The Health and Safety chapter of the *San Bruno General Plan*, adopted in 2009, contains a number of goals and policies related to noise. Specifically, the following policies are relevant to the project.

- **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:
    - Incorporating buffers and/or landscaped berms along high-noise roadways or railways;
    - Incorporating traffic calming measures and alternative intersection design within and/or adjacent to the project;
    - Using reduced-noise pavement (rubberized asphalt); and
    - Incorporating state-of-the-art structural sound attenuation measures.
- **HS-33:** Prevent the placement of new noise sensitive uses unless adequate mitigation is provided. Establish insulation requirements as mitigation measures for all development, per the standards in [Table 3.10-6 in this EIR].
- **HS-35:** Require developers to comply with relevant noise insulation standards contained in Title 24 of the California Code of Regulations (Part 2, Appendix Chapter 12A).
- **HS-36:** Encourage developers of new residential projects to provide noise buffers other than sound walls, such as vegetation, storage areas, or parking, as well as site planning and locating bedrooms away from noise sources.
- **HS-37:** Require that all sponsors of new housing (residential and senior housing units) record a notice of Fair Disclosure, regarding the proximity of the proposed development to San Francisco International Airport and of the potential impacts of aircraft operation, including noise impacts, per Ordinance 1646 and AB 2776.
- **HS-38:** Require developers to mitigate noise exposure to sensitive receptors from construction activities. Mitigation may include a combination of techniques that reduce noise generated at the source, increase the noise insulation at the receptor, or increase the noise attenuation rate as noise travels from the source to the receptor.
- **HS-40:** Prohibit new residential development within the 70+ Airport CNEL areas, as dictated by Airport Land Use Commission infill criteria, unless, on a project by project bases, a proposed residential development is approved through the Local Agency Override process consistent with the Public Utilities Code Section 21675.1(d).[2]

[2] This policy of the *San Bruno General Plan* was amended as part of the 2023 Housing Element adoption, through Resolution 2023-10. https://sanbruno.ca.gov/DocumentCenter/View/4011/City-Council-Reso-2023-10?bidId=.

- **HS-42:** Require new residential development within the 65 dBA CNEL SFO noise contour to submit an avigation easement to the airport. Specific avigation easement requirements shall be consistent with the County of San Mateo Comprehensive Airport Land Use Compatibility Plan for SFO.
- **HS-43:** Allow reasonable latitude for noise generated by uses that are essential to community health, safety, and welfare, such as emergency vehicle operations and sirens.

The *San Bruno General Plan* contains Land Use Compatibility standards (shown in *San Bruno General Plan* Table 7-2, and included as Table 3.10-6 here) that apply to the development of new land uses in areas outside of the airport noise-affected areas, and are therefore presented here for informational purposes only. For land within 60-dB or greater airport noise contours, county airport land use compatibility noise standards from the ALUCP for SFO (described previously) shall apply.

City of San Bruno Municipal Code

The San Bruno Municipal Code contains regulations pertaining to noise in Section 6.16, *Noise Regulations*. That section discusses quantitative noise limits for various noise sources in the jurisdiction. The following Municipal Code guidelines are relevant to the project.

6.16.030, Ambient Noise Level Limits

Where the ambient noise level is less than designated in this section, the respective noise level shall govern (Sound Level A, decibels). Residential zone: 10:00 p.m. to 7:00 a.m., 45 dB; 7:00 a.m. to 10:00 p.m., 60 dB.

6.16.050, Noise Levels Exceeding Ambient Base Level

Any noise level exceeding the zone ambient base level at the property plane of any property, or exceeding the zone ambient base level on any adjacent residential area zone line or at any place of other property (or, if a condominium or apartment house, within any adjoining apartment), by more than 10 dB shall be deemed to be prima facie evidence of a violation of the provisions of this chapter. However, during the period of 7:00 a.m. to 10:00 p.m., the ambient base level may be exceeded by 20 dB for a period not to exceed 30 minutes during any 24-hour period.

6.16.060, Machinery Noise Levels

No person shall operate any machinery, equipment, pump, fan, air-conditioning apparatus, or similar mechanical device in any manner so as to create any noise that would cause the noise level at the property plane of any property to exceed the ambient base noise level by more than 10 dB. However, during the period of 7:00 a.m. to 10:00 p.m., the ambient base level may be exceeded by 20 dB for a period not to exceed 30 minutes during any 24-hour period.

6.16.070, Construction of Buildings and Projects

No person shall, within any residential zone, or within a radius of 500 feet therefrom, operate equipment or perform any outside construction or repair work on any building, structure, or other project or operate any pile driver, power shovel, pneumatic hammer, derrick, power hoist, or any other construction-type device which shall exceed, between the hours of 7:00 a.m. and 10:00 p.m., a noise level of 85 dB, as measured at 100 feet, or exceed between the hours of 10:00 p.m. and 7:00 a.m. a noise level of 60 dB, as measured at 100 feet, unless such person shall have first obtained a permit therefore from the director of public works. No permit shall be required to perform emergency work.

Table 3.10-6. Land Use Compatibility for Community Noise Environments

Land Use Category	Exterior Day/Night Noise Levels, L_{dn} (dB)						
	55	60	65	70	75	80	
Residential – Single Family							
Residential –Multiple Family							
Transient Lodging – Motels, Hotels							
Schools, Libraries, Churches, Hospitals, Nursing Homes							
Auditoriums, Concert Halls, Amphitheaters							
Sports Arena, Outdoor Spectator Sports							
Playgrounds, Parks							
Golf Courses, Riding Stables, Water Recreation, Cemeteries							
Office Buildings, Business, Commercial and Professional							
Industrial Manufacturing, Utilities, Agriculture							

INTERPRETATION

	Normally Acceptable	Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.
	Conditionally Acceptable	New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design.
	Normally Unacceptable	New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.
	Clearly Unacceptable	New construction or development should not be undertaken.

6.16.080, Public Areas

A. No source of sound, including, but not limited to, amplifiers and other musical devices, shall exceed seventy decibels at a distance of fifty feet from the source of the sound between the hours of eleven a.m. and four p.m. unless a permit shall first have been obtained from the city council.

B. No source of sound, including, but not limited to, amplifiers and other musical devices, shall exceed sixty decibels at a distance of fifty feet from the source of the sound between the hours of four p.m. and eleven a.m. unless a permit shall first have been obtained from the city council.

6.16.160, Amplified Sound—Regulations

The commercial and noncommercial use of sound-amplifying equipment shall be subject to the following regulations:

A. The only sounds permitted shall be either music or human speech, or both.

B. The operation of sound-amplifying equipment shall only occur between the hours of eight a.m. and eight p.m. each day except on Sundays and legal holidays. No operation of sound-amplifying equipment for commercial purposes shall be permitted on Sundays or legal holidays. The operation of sound-amplifying equipment for noncommercial purposes on Sundays and legal holidays shall occur only between the hours of ten a.m. and eight p.m.

C. Sound level emanating from sound-amplifying equipment shall not exceed fifteen decibels above the ambient base noise level, as measured at a distance of one hundred feet from the sound source.

D. Notwithstanding the provisions of subsection C, sound-amplifying equipment shall not be operated within two hundred feet of churches, schools, hospitals or city or county buildings.

3.10.2.2 Environmental Setting

Regional Setting

The major noise sources affecting the project vicinity are vehicular traffic, railroad activity, aircraft activity, and nearby commercial/industrial activities. The surrounding area is largely developed with commercial, industrial, and warehouse facilities to the north. Predominately single-family residences are located to the east (across Huntington Avenue) and south (across Interstate [I-]380) of the project site, while multi-family residences are located to the west (across El Camino Real). The nearest residential land uses are located approximately 200 feet east of the project site, across Huntington Avenue and south of Tanforan Avenue in the City of San Bruno. Tanforan Avenue also serves as the boundary between San Bruno and South San Francisco. The area north of Tanforan Avenue includes large industrial warehouses and parking lots that will be demolished for construction of the approved Southline Project in the City of South San Francisco. Construction has commenced on Phase 1 of the Southline Project, which will include office, life science, and amenity uses. No residential uses are planned as part of the Southline Project. The San Bruno Bay Area Rapid Transit (BART) station is adjacent to the east of the project site, and the San Bruno Caltrain and South San Francisco Caltrain stations are approximately 0.4 mile south and 1.3 miles north of the project site, respectively. SFO is approximately 1 mile southeast of the project site.

Project Site

The project site is currently developed with the Tanforan Mall and a vacant parcel north of Sneath Lane. The mall property includes various retail uses, parking structures, and surface parking. The existing ambient noise environment at the project site is characteristic of an urban environment, with highway and local traffic, aircraft activity, BART and Caltrain activity, and commercial activities, such as loading activities, being the dominant noise sources in the project vicinity.

Ambient noise is often measured to help characterize existing ambient noise levels in the vicinity of a given project. To quantify existing ambient noise levels near the project site, long- (24-hour) and short-term (15-minute) ambient noise measurements were conducted between Tuesday July 23 and Thursday July 25, 2024. On these days, weather conditions were clear with no precipitation. Winds were mild, with wind speeds averaging approximately 2 to 7 miles per hour.

Long- and short-term monitoring locations were selected to capture ambient noise levels throughout the day and night in areas representative of both the project site and nearby noise-sensitive receptors. The long-term measurements were conducted using a Piccolo Type 2 sound-level meter (SLM). The SLM measured 1-hour L_{eq} noise levels for a period of approximately 24 hours. The recorded 1-hour data were used to calculate or determine the 24-hour L_{dn} and CNEL noise levels, daytime and nighttime average noise levels, the highest and lowest 1-hour L_{eq} noise level recorded during the measurement window at each location.

Nine long-term noise measurement locations near the project site were selected. The 24-hour noise levels from the long-term measurements ranged from 71.4 to 75.5 dBA L_{dn}, with higher noise levels generally corresponding to areas near busier roadways (i.e., Interstate [I-]380, El Camino Real, and Huntington Avenue) and the nearby Caltrain passenger rail line (located parallel to Herman Street). In addition, five short-term noise measurements were conducted near the project site. Short-term measurements were conducted using a Larson Davis 831 Type 1 SLM, which measured L_{eq} every second for 15 minutes, as well as the overall L_{eq} noise level averaged over the 15-minute measurement interval. The measured short-term noise levels ranged from 62.8 to 67.3 dBA equivalent continuous sound level (dBA L_{eq}).

The results of the noise measurement survey are summarized in Tables 3.10-7 and 3.10-8 for the long- and short-term noise measurements, respectively. Noise measurement locations are shown in Figure 3.10-1. Refer to Appendix 3.10-1, *Noise Technical Appendix*, for the complete dataset of noise measurement data from the field survey.

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Figure 3.10-1
Noise Measurement Locations Map

Table 3.10-7. Measured Existing Noise Levels in the Project Vicinity, Long-Term

				Daytime		Nighttime	
Site	**Site Location**	**L_{dn}**	**CNEL**	**Highest 1-Hour L_{eq} [a]**	**Average 1-Hour L_{eq} [b]**	**Lowest 1-Hour L_{eq} [c]**	**Average 1-Hour L_{eq} d**
LT-1	Lamp post in Tanforan Mall parking lot, nearest to Sneath Lane, near the Hyundai car dealership.	72.9	73.2	72.8	69.3	57.6	65.7
LT-2	Southern parking lot of Sonesta ES Suites San Francisco Airport San Bruno hotel.	71.4	71.7	70.4	66.9	56.7	64.6
LT-3	Second telephone pole on Atlantic Avenue, east of the Atlantic Avenue/Huntington Avenue intersection.	74.4	74.6	72.6	69.0	57.2	67.8
LT-4	Telephone pole at the intersection of Buena Vista Avenue and Diamond Street.	75.2	75.4	75.2	70.6	59.1	68.4
LT-5	Second telephone pole on Easton Avenue, south of the Forest Lane/Easton Avenue intersection.	73.1	73.5	72.8	69.8	59.2	65.8
LT-6	Tree near Southeast corner of Avalon San Bruno.	72.8	73.1	72.3	69.1	56.3	65.7
LT-7	Telephone pole in the Southeast corner of Rockwood Drive.	71.9	72.1	72.1	67.5	54.6	65.0
LT-8	Tree along southern Tanforan Mall driveway, near the southeast surface parking lot.	75.5	75.7	73.6	69.9	60.2	68.9
LT-9	Lamp post on deck of southeastern Tanforan Mall parking structure, near the southern exit ramp.	74.4	74.7	73.7	70.0	59.6	67.5

LT = long-term (24-hour) ambient noise measurement.
All noise levels are reported in A-weighted decibels (dBA).
Daytime Hours are defined in the City of San Bruno as 7:00 a.m. to 10:00 p.m.
Nighttime Hours are defined in the City of San Bruno as 10:00 p.m. to 7:00 a.m.
[a] Highest daytime 1-hour L_{eq} is the highest recorded L_{eq} level during daytime hours.
[b] The average daytime L_{eq} was the average hourly L_{eq} noise level during daytime hours.
[c] Lowest nighttime 1-hour L_{eq} is the lowest recorded L_{eq} level during nighttime hours.
[d] The average nighttime L_{eq} was the average hourly L_{eq} noise level during nighttime hours.

Table 3.10-8. Measured Existing Noise Levels in the Project Vicinity, Short-Term

Site	Site Location	Measurement Start Time	L_{eq}	L_{max}	L_{min}	Dominant Noise Source(s)
ST-1	North of the San Bruno BART station.	10:00 a.m.	66.5	84.4	49.6	Vehicular traffic, BART announcements, aircraft take off noise
ST-2	South of Bayshore Circle, near playground.	10:34 a.m.	62.8	82.7	49.0	Vehicular traffic, aircraft take off noise
ST-3	Across the street from 1058 East Huntington Avenue.	11:06 a.m.	67.3	86.7	54.0	Vehicular traffic, aircraft take off noise
ST-4	Northwest corner of the Tanforan Mall parking lot, near the intersection of Sneath Lane and El Camino Real.	9:10 a.m.	63.3	80.1	55.2	Vehicular traffic, aircraft take off noise
ST-5	Southeast corner of the Golden Gate National Cemetery.	11:35 a.m.	64.7	85.9	50.9	Vehicular traffic, aircraft take off noise

ST = short-term (15-minute) ambient noise measurement.
All noise levels are reported in A-weighted decibels (dBA).

3.10.3 Environmental Impact Analysis

This section describes the environmental impacts of the project on noise and vibration. It describes the thresholds used to determine whether an impact would be significant and methods used to evaluate the impacts. Measures to mitigate significant impacts are provided, where appropriate.

3.10.3.1 Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, the project would have the potential to have a significant effect on noise and vibration if it would result in any of the following conditions.

a. 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?

b. Generation of excessive groundborne vibration or groundborne noise levels?

c. 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?

The CEQA Guidelines do not provide a quantitative measurement to define “substantial” noise or “excessive” ground vibration. Therefore, the following quantifiable thresholds were used to evaluate the significance of impacts, based on applicable regulations, ordinances, and policies.

Construction

Construction activities generate temporary noise in the vicinity of project sites. Noise generated by construction would be short-term and vary considerably day-to-day. The City of San Bruno Municipal Code establishes criteria for construction noise. Noise resulting from project construction activities is compared to the applicable City of San Bruno criteria, described below.

- No person shall, within any residential zone, or within a radius of 500 feet therefrom, operate equipment or perform any outside construction or repair work on any building, structure, or other project or operate any pile driver, power shovel, pneumatic hammer, derrick, power hoist, or any other construction-type device that shall exceed:
    - A noise level of 85 dBA, as measured at 100 feet, between the hours of 7:00 a.m. and 10:00 p.m., or
    - A noise level of 60 dB, as measured at 100 feet, between the hours of 10:00 p.m. and 7:00 a.m.,
    - Unless such person shall have first obtained a permit therefore from the director of public works. No permit shall be required to perform emergency work.

Construction Haul Truck Noise

The City of San Bruno does not have specific thresholds pertaining to construction haul truck noise. Therefore, anticipated daily haul truck noise was assessed to determine if a 3 dB increase over ambient noise levels, considered to be "barely perceptible," would occur as a result of hauling activity.

Traffic Noise

In general, an increase of 3 dBA in traffic noise is considered just noticeable, a change of 5 dBA in traffic noise is clearly noticeable, and a change of 10 dBA in traffic noise is perceived as a doubling. This EIR applies the following thresholds of significance for traffic-related noise increases:

- A project-generated increase of 5 dBA in traffic noise, if the resulting traffic noise would remain below the normally acceptable range at a noise-sensitive land use (i.e., L_{dn} in San Bruno of 65 dBA or less for residences and childcare and 70 dBA or less for offices and retail).
- A 3 dBA or greater increase in traffic noise resulting from project implementation occurs when the baseline-plus-project noise level is above the normally acceptable range for a noise-sensitive land use.

A cumulative impact related to traffic noise would be identified if:

- A project-generated increase of greater than 1 dBA to a cumulative traffic noise increase of 3 dBA or more, and where cumulative traffic noise levels would be *above* the normally acceptable range at a noise-sensitive land use
- A project-generated increase of greater than 1 dBA to a cumulative traffic noise increase of 5 dBA or more, and where cumulative traffic noise levels would remain *within* the normally acceptable range at a noise-sensitive land use

Heating, Ventilation, and Cooling Equipment

Noise resulting from the operation of project mechanical equipment is compared to the applicable City of San Bruno criterion from the City Municipal Code. This criterion states that no person shall operate any machinery, equipment, pump, fan, air-conditioning apparatus, or similar mechanical device in any manner so as to create any noise that would cause the noise level at the property plane of any property to exceed the ambient base noise level by more than 10 dB (noting this analysis assumed equipment could be operating 24 hours per day and 7 days per week under a worst-case condition). The ambient noise level may be exceeded by 20 dB, between 7 a.m. and 10 p.m., for a period not to exceed thirty minutes during any 24-hour period. Because of the nature of heating and cooling equipment, however, this analysis assumes all equipment could operate for more than 30 minutes per day, and the 10 dB over ambient threshold is applied.

Emergency Generator Noise

Similar to the criterion used for assessment of heating, ventilation, and air conditioning (HVAC) equipment, described previously, noise resulting from the testing of emergency generators is analyzed to determine if it would cause the noise level at the property plane of any nearby noise-sensitive use to exceed the ambient base noise level by more than 10 dB (noting this analysis assumed generator testing could take place for up to 1 hour at a time). The ambient noise level may be exceeded by 20 dB, between 7 a.m. and 10 p.m., for a period not to exceed thirty minutes during any 24-hour period. However, because each generator may be tested for up to one hour per day on a worst-case day, the 10 dB over ambient threshold is applied.

Amplified Music or Speech

Estimated noise levels resulting from programmed events under the project are compared to the existing ambient noise level in the vicinity of the project site to determine if a 15 dB, or greater, increase above the ambient base noise level at 100 feet is expected to occur.

Vibration

Caltrans vibration guidelines are commonly used as vibration thresholds for development projects because most local agencies and jurisdictions do not have vibration-specific thresholds. The following Caltrans vibration criteria are applied in the vibration analysis for the project.

- **Annoyance.** Generation of continuous/frequent intermittent construction-related vibration levels exceeding the “strongly perceptible” level of 0.1 PPV in/sec at offsite sensitive receptors (residences, schools, childcare centers, etc.) during nighttime hours when people normally sleep.
- **Damage.** Generation of continuous/frequent intermittent construction-related vibration levels exceeding the modern industrial/commercial buildings damage standard of 0.5 PPV in/sec at onsite or offsite commercial/industrial buildings or exceeding the “older residential structure” damage standard of 0.3 PPV in/sec and nearby older residential structures (i.e., structural damage).

3.10.3.2 Methodology and Approach

Daytime Construction

Estimates of combined construction and demolition noise levels for the project were based on reference noise levels from the Federal Highway Administration (FHWA) roadway construction noise model, the FTA general assessment construction noise analysis method, and information provided by the project applicant (FHWA 2006; FTA 2018). FTA recommends combining noise levels from the two loudest pieces of equipment expected to operate simultaneously in roughly the same location. For the purposes of this analysis, and to provide a reasonably conservative assessment due to the large size of the project site, the analysis included an evaluation of the three loudest pieces of equipment expected to operate during a given construction phase, assuming simultaneous operation in roughly the same location on the project site.

FHWA noise source data used in the construction noise model include A-weighted L_{max} noise levels, measured at 50 feet from the construction equipment, along with utilization factors for the equipment. The utilization factor is the percentage of time each piece of equipment is typically operated at full power over a specified time period. It is used to estimate L_{eq} values from L_{max} values. For example, the L_{eq} value for a piece of equipment that operates at full power over 50 percent of the time is 3 dB less than the L_{max} value (FHWA 2006).

Modeled construction noise levels were compared to applicable construction noise standards for daytime hours. Daytime construction noise generated within 500 feet of a residential zone in San Bruno would be limited to 85 dBA at a distance of 100 feet.

Non-Daytime Construction

The only construction activities proposed for non-daytime hours are concrete pours. Note that many of these pours would actually be early morning construction, beginning at 5:00 a.m., and would not occur throughout the entire duration of a single night. As described for the daytime construction noise analysis, this analysis included an evaluation of the three loudest pieces of equipment expected to operate in a given area during non-daytime hour. Equipment used for concrete pours would be staged at least 50 feet back from the project perimeter, resulting in all equipment being at least 200 feet from the nearest offsite residences (east of Huntington Avenue), and usually further. Modeled combined noise levels from nighttime concrete pour activities were modeled and compared to the nighttime construction noise threshold that applies in the City of San Bruno of 60 dBA at a distance of 100 feet.

Construction Haul Truck Noise

Existing traffic volumes in the form of turning movements (which were converted to into average daily traffic (ADT) volumes per directions from the traffic consultant), existing vehicle-mix assumptions (i.e., the proportion of automobiles, trucks, buses, and other vehicles), and speed limits were provided by the project traffic engineer (Fehr & Peers). Provided construction data was examined to determine the total number of haul or heavy truck trips that may occur on a worst-case day under the project. The project haul route includes traveling to the site via I-380, exiting at El Camino Real, traveling northbound on El Camino Real, turning right on Sneath Lane, and right again on Huntington Avenue, and entering the site near the southeast corner of the project site. To depart the project site, heavy trucks would use this route in reverse. The total volumes of haul trucks that would occur on a worst-case day during project construction was added to the calculated Existing

ADT volumes for segments along the haul route described previously to create an Existing plus Haul Truck condition. Quantitative modeling of traffic noise was conducted for both Existing and Existing plus Haul Truck conditions using a spreadsheet that was based on the FHWA Traffic Noise Model, version 2.5.

The City of San Bruno does not have specific thresholds pertaining to construction haul truck noise. Therefore, anticipated daily haul truck noise was assessed to determine if a 3 dB, or "barely perceptible," increase over modeled existing traffic noise levels would occur at noise-sensitive receptors as a result of hauling activity.

The haul truck noise analysis assesses the potential for construction-related haul trucks using the local roadway network to result in substantial noise increases at sensitive receptors during project construction. The number of haul truck trips would vary by construction phase and would depend on the mix of land uses ultimately constructed (refer to Section 3.10.3.3, *Buildout Scenarios Evaluated*, for a discussion of the buildout scenarios identified for EIR analysis purposes). On a worst-case construction day, up to 256 one-way haul truck trips could occur under Scenario A (Research and Development [R&D] Scenario) during the most hauling-intensive overlapping subphases of construction (Make Ready Phase – Site, Rough Grade, Site Utilities, Roads, and Roads Phase 1-4 and Phase 1 - Residential Building 1, Basement Shoring/Excavation). Under Scenario B (Residential Scenario), the worst-case number of one-way haul truck trips per day would be 251. Modeling results between the two scenarios would be similar, but Scenario A was used for the worst-case modeling because that total daily volume of haul trucks was slightly higher. Although most subphases of construction would have fewer daily haul truck trips than this maximum, the estimated worst-case daily truck trip number is used in the analysis to provide a reasonably conservative assessment of haul truck noise.

Traffic Noise

Traffic noise increases along nearby roadway segments resulting from project development were quantitatively modeled using traffic volumes, existing vehicle-mix assumptions (i.e., the proportion of automobiles, trucks, buses, and other vehicles), and speed limits provided by the project traffic engineer (Fehr & Peers). Provided daily turn movements were converted into ADT volumes. Quantitative modeling of traffic noise from the project was conducted using a spreadsheet based on the FHWA Traffic Noise Model, version 2.5, for the following conditions.

- Baseline
- Baseline plus Project
- Cumulative No Project (2040)
- Cumulative (2040) plus Project

Refer to Section 3.14.3.3, *Buildout Scenario Evaluated*, in Section 3.14, *Transportation*, for additional description of the modeled conditions. The spreadsheet calculates the traffic noise level at a fixed distance from the centerline of a roadway (50 feet) according to the traffic volume, roadway speed, and vehicle mix predicted to occur under each condition. The evaluation of potential direct traffic noise impacts to nearby noise-sensitive land uses compared traffic noise modeling for the Baseline condition to the Baseline-plus-Project condition.

Heating, Ventilation, and Cooling Equipment

The makes and models of project heating, cooling, and ventilation equipment for the project have not been finalized, but information pertaining to the types and quantities of project equipment proposed for use by building was provided by the project applicant. An example case of reasonably foreseeable combined noise levels based on similar equipment to those proposed under the project was modeled. The portion of the project site that would have mechanical equipment installed closest to offsite sensitive uses (i.e., the southeast portion of the project site or Flex Zone II) is the focus of the reasonable worst-case mechanical equipment noise evaluation. Estimated noise levels by equipment type from readily available data sources (e.g., FHWA and Hoover and Keith manuals) were used to model estimated combined equipment noise. Estimated combined noise levels were compared to the mechanical equipment noise threshold in San Bruno (i.e., a greater than 10 dB increase over ambient at nearby sensitive uses) to determine if noise impacts from heating, cooling, and ventilation equipment would be considered significant.

Emergency Generator Testing

The project would incorporate diesel generators to be used in cases of emergency power disruptions. While use of the generators would be limited to emergency circumstances, during which time noise from a generator is typically considered to be exempt from local noise restrictions, periodic testing would be required. The evaluation of noise from testing project emergency generators was based on assumptions developed by the project applicant. Although the makes and models of project generators have not been finalized, estimated noise levels by generator size/capacity from readily available data sources (e.g., Cummins) were used to approximate project-specific generator noise. Noise from the testing of project emergency generators at various distances was estimated using site plans, readily available specification data for sound levels by equipment, and equipment layout information provided for both scenarios, along with the general point-source attenuation equation of 6 dB per doubling of distance. Modeling results were compared to the applicable San Bruno Municipal Code threshold to determine if a greater than 10 dB increase over the existing ambient noise level was expected to occur.

Parking Activity

Parking activity noise at the aboveground parking structures nearest to offsite noise-sensitive land uses was estimated based on the maximum capacity of each garage. Calculations from FTA's *Transit Noise and Vibration Impact Assessment Manual* (FTA 2018) were used to estimate the peak-hour parking activity noise at a potential parking structure in Flex Zone II and Parking/Field House 1 (largest), to determine if parking activity noise would result in perceptible increases in noise at sensitive receptors in the vicinity.

Loading Dock Activity

Per the project traffic engineer, usage at each project loading dock would be fairly minor because the project land uses are not substantial truck generators (e.g., distribution centers). Therefore, noise from project loading dock activity is discussed qualitatively based on the fact that commercial loading would typically occur during daytime hours, the nearest loading dock under either scenario is located at least 300 feet (and usually much more) from the nearest offsite noise-sensitive receptors, loading docks would generally be internal to buildings or parking structures, and existing

measured noise levels at the project site and at nearby sensitive uses were already elevated (e.g., in the range of 71 to 76 dBA L_{dn}).

Potential for Noise from New Stationary Sources to Combine

The evaluation of stationary operational noise impacts is based on the potential for noise from the individual sources described previously to exceed the applicable noise ordinance limits or criteria for each respective source. While it is possible for noise levels from multiple stationary sources to combine and result in greater noise levels, overall, noise levels are generally dominated by the loudest and closest source of noise. To ensure a reasonably conservative analysis, the analysis of each individual source includes realistic worst-case assumptions, based on the upper level of estimated noise levels that each source may generate at the closest reasonable distance between the source and the receiver. In addition, the municipal code criteria for operational noise sources in San Bruno are based on individual equipment and/or sources because enforcement of noise ordinance limits would typically be based on measuring the noise emanated by an individual source. For these reasons, the analysis of stationary operational noise impacts evaluates potential noise levels from individual pieces of equipment or noise sources associated with the project, rather than theoretical scenarios with multiple noise sources (e.g., mechanical equipment and amplifies music) operating at the same time.

3.10.3.3 Buildout Scenario Evaluated

As discussed in Section 3.0.3.1, *Buildout Scenarios*, for each resource area studied, the EIR evaluates the scenario with the greatest potential to result in a significant impact. In some cases, impacts would be the same regardless of the buildout scenario, so the analysis does not evaluate a specific buildout scenario. This approach ensures that the EIR identifies the maximum potential impacts of the project based on reasonable foreseeable development outcomes. Table 3.10-9 summarizes the approach used for each impact analysis related to noise and vibration.

Table 3.10-9. Impact Analysis Approach for Noise

Impact Criteria	Scenario A	Scenario B	EIR Approach
Impact NOI-1: Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in a local general plan or noise ordinance or applicable standards of other agencies?	Scenario A has more life science laboratory and offices uses and more amenity uses.	Scenario B has more residential and hotel uses.	*Construction equipment:* Both scenarios would have similar construction activities using the same equipment in the same project area, resulting in comparable construction noise impacts. Therefore, this analysis approach is not based on one scenario or the other, and accounts for any future development that could occur under the project. *Construction haul trucks:* Scenario A is evaluated because it would have more haul trucks than Scenario B. *Traffic:* The most conservative scenario for traffic noise during operation is the one with the use that generates the most traffic. Per the project traffic consultant, daily trips are highest for Scenario B, AM peak hour trips are highest for Scenario A, and the PM peak

Impact Criteria	Scenario A	Scenario B	EIR Approach
			hour trips are highest for Scenario B. Because estimated daily trips dictate traffic noise impacts, the traffic noise analysis is based on Scenario B. *Other operational sources:* Noise from other operational noise sources would generally be similar under both scenarios, with the exception of the location of noise-generating mechanical equipment. Regarding mechanical heating and cooling equipment, Scenario B involves the development of more operational heating and cooling equipment closer to nearby sensitive uses and is therefore the focus of the mechanical heating and cooling equipment noise analysis. With respect to emergency generators, Scenario A would result in greater noise levels during generator testing at nearby sensitive uses than Scenario B, based on the modeling results. Therefore, Scenario A is the focus emergency generator noise analysis. Regarding parking garage noise, the shortest distance between a parking structure and offsite noise-sensitive use would occur under Scenario A; therefore, Scenario A is the focus of the parking activity noise analysis.
Impact NOI-2: Generate excessive groundborne vibration or groundborne noise levels?	—	—	Same for both scenarios. Both scenarios would have similar construction activities using the same equipment in the same project area and, therefore, would result in comparable vibration impacts. Therefore, the analysis approach is not based on one scenario or the other, and accounts for any future development that could occur under the project.
Impact NOI-3: 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 and expose people residing or working in the project area to excessive noise levels?	Scenario A includes 1,000 dwelling units.	Scenario B includes 1,500 dwelling units.	Scenario B. It is likely there would be more residents onsite for longer under Scenario B than there would be workers on site for Scenario A. Therefore, Scenario B is more conservative for residential and worker exposure to aircraft noise because there are more dwelling units than under Scenario A.

3.10.3.4 Impacts and Mitigation Measures

Impact NOI-1-A: Project construction would generate 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 (Significant and Unavoidable).

Construction of the project is anticipated to commence in 2026 and end in 2033, lasting approximately 90 months or 7.5 years. Project construction areas are at least 150 feet from the nearest noise-sensitive land uses, which are residences located east of the project site and east of Huntington Avenue in the City of San Bruno. Noise levels for the equipment proposed for project construction are provided in Table 3.10-10. Potential construction noise impacts resulting from daytime and non-daytime construction activities are evaluated below.

Table 3.10-10. Noise from Equipment Proposed for Project Construction (L_{eq})

Equipment Type	Noise at 25 Feet (L_{eq})[a]	Noise at 100 Feet (L_{eq})[a]
Backhoe [b]	80	68
Compactor	82	70
Concrete pump truck	80	68
Crane	79	67
Dozer	84	72
Dump truck	78	66
Excavator	83	71
Front-end loader [c]	81	69
Grader [d]	87	75
Man lift [e]	74	62
Scraper	86	74
Welder	76	64

[a] Noise levels are based on source noise levels from the FHWA Roadway Construction Noise Model (FHWA 2006).
[b] Representative of a skid steer.
[c] Representative of a skip loader and forklift.
[d] Representative of a caterpillar blade.
[e] Representative of a boom lift and man hoist.

Daytime Construction

Noise from daytime construction activities in San Bruno that takes place between 7:00 a.m. and 10:00 p.m. within 500 feet of residential land uses generally shall be limited to a noise level of 85 dBA L_{eq}, as measured at 100 feet per the City Municipal Code. To provide a reasonable worst-case analysis of potential combined noise levels from project construction, this analysis assumes that the three loudest pieces of equipment proposed for a construction subphase would operate concurrently and in the same general location on the project site during daytime hours. Modeling was conducted to estimate combined construction noise levels by subphase under both Scenario A and Scenario B at a distance of 100 feet. Table 3.10-11 provides the estimated combined noise levels for all phases under both scenarios at a distance of 100 feet.

Table 3.10-11. Combined Project Construction Noise Levels at 100 Feet for Both Scenarios

Phase	Combined Noise Level at 100 Feet (dBA, L_{eq})
Make Ready - Install Offsite Utilities [a, b]	77
Make Ready - Cinema Demolition/Access to Target [a, b]	75
Make Ready - Cinema Renovation [a, b]	73
Make Ready - Abatement [a, b]	74
Make Ready - Demo Existing Mall and Parking (Phase 1-4) [a, b]	76
Make Ready - Rough Grade, Site Utilities, Roads (include PG&E, JT), & Roads Phase 1-4 (Grade Site) [a, b]	79
Make Ready - Rough Grade, Site Utilities, Roads (include PG&E, JT), & Roads Phase 1-4 (Roads) [a, b]	78
Phase 1 - Resi 1, Shoring/Excavation [a, b]	75
Phase 1 - Resi 1, Construction [a, b]	76
Phase 1 - Resi 2, Construction [a, b]	75
Phase 1 - Resi 3, Shoring/Excavation [a, b]	75
Phase 1 -Resi 3, Construction [a, b]	76
Phase 2 - Retail Construction [a, b]	77
Phase 3 – Parking/Field House 1, Shoring/Excavation [a, b]	75
Phase 3 - Parking /Field House 1, Construction [a, b]	75
Phase 3 - Building 3, Shoring/Excavation [a, b]	75
Phase 3 - Building 3, Construction [a, b]	75
Phase 3 - Building 1, Shoring/Excavation [a, b]	76
Phase 3 - Building 1, Construction [a, b]	75
Phase 3 - Building 2, Shoring/Excavation [a, b]	76
Phase 3 - Building 2, Construction [a, b]	75
Phase 4 Flex 1 – Shoring/Excavation [a, c]	76
Phase 4 Flex 1 – Construction [a, c]	75
Phase 4 Flex 2 – Shoring/Excavation [a, c]	76
Phase 4 Flex 2 – Construction [a, c]	75

[a] This is a subphase of Scenario A (Maximum R&D Scenario).

[b] This is a subphase of Scenario B (Residential Scenario).

[c] Estimated noise levels in the flex zones were calculated based on information provided by the project applicant describing reasonably foreseeable building types and locations for purposes of CEQA analysis. Refer to Appendix 3.10-1, *Noise Technical Appendix*, for specific assumptions. Where multiple buildings were modeled in a flex zone, the highest noise level by construction phase is shown.

As shown in this table, estimated combined noise levels at a distance of 100 feet during all project construction phases are below the 85 dBA threshold. As also shown in this table, initial modeling demonstrated that the loudest phase of construction noise under both scenarios would be the Make Ready - Grade Site phase, which has an estimated noise level of 79 dBA L_{eq} at 100 feet.[3] This phase would involve potentially concurrent operation of a grader and two scrapers. Table 3.10-12

[3] Identified as Make Ready - Rough Grade, Site Utilities, Roads (include PG&E, JT), & Roads Phase 1-4 (Grade Site) in Table 3.10-12.

presents the modeled combined noise levels from this worst-case nosiest phase of construction at various distances from the construction area, including at the nearest sensitive uses, which are at least 150 feet from the project site.

As shown in Table 3.10-12, reasonable worst-case combined construction noise during daytime hours (based on the assumptions described previously) is expected to be approximately 79 dBA L_{eq} at a distance of 100 feet from the noise source. This level is below the City of San Bruno's construction noise standard of 85 dBA at a distance of 100 feet that applies between the hours of 7:00 a.m. and 10:00 p.m. In addition, noise levels at the nearest sensitive use would be even lower, with an estimated worst-case noise level during the loudest construction phase of 76 dBA L_{eq} at 150 feet from the project perimeter (noting that construction would often take place much further from the nearest sensitive uses than this distance due to the size of the project site). Furthermore, estimated noise levels do not account for shielding that may occur due to existing or new structures developed during construction that may be located between the construction activities and nearby sensitive uses; structures located between noise-producing equipment and sensitive receptors would reduce construction noise levels as experienced at sensitive uses.

Because construction noise is expected to be below the applicable City of San Bruno limits during daytime hours, construction that takes place during daytime hours would not conflict with City of San Bruno daytime construction noise regulations. Daytime construction noise impacts under the project would be ***less than significant***, and no mitigation measures would be required.

The less-than-significant construction noise impacts during daytime hours would be further reduced through compliance with General Plan Policy HS-38, which requires that developers mitigate noise exposure to sensitive receptors from construction activities, and implementation of best management practices identified in the Noise and Vibration Assessment for the *City of San Bruno Housing Element Update Initial Study/Mitigated Negative Declaration* (IS/MND) (which would also be implemented as part of the project).

Best Management Practices for Construction Noise (All Hours)

- Construction equipment shall be well-maintained and used judiciously to be as quiet as practical.
- Equip all internal combustion engine-driven equipment with mufflers, which are in good condition and appropriate for the equipment.
- Utilize "quiet" models of air compressors and other stationary noise sources where technology exists.
- Locate all stationary noise-generating equipment, such as air compressors and portable power generators, away from noise-sensitive receptors.
- Locate staging areas and construction material areas away from noise-sensitive receptors.
- Prohibit all unnecessary idling of internal combustion engines.
- Consider temporary noise barriers during construction phases involving earth moving equipment (e.g., grading operations) where they would be effective in reducing the construction noise impact, when directly adjoining sensitive receptors. An 8-foot plywood noise barrier could reduce noise levels by at least 5 dBA.

- Designate a "disturbance coordinator" who would be responsible for responding to any local complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., starting too early, bad muffler) and will require that reasonable measures warranted to correct the problem be implemented. Conspicuously post a telephone number for the disturbance coordinator at the construction site and include it in the notice sent to neighbors regarding the construction schedule.

Implementation of the best management practices outlined above as required by General Plan Policy HS-38 would ensure that developers mitigate noise exposure during daytime hours to sensitive receptors by reducing construction noise levels emanating from the site and minimizing disruption and annoyance.

Table 3.10-12. Estimated Worst-Case Project Construction Noise at Various Distances (L_{max} and L_{eq})

Source Data	Maximum Sound Level (dBA)	Utilization Factor	L_{eq} Sound Level (dBA)
Construction Condition: Make Ready - Rough Grade, Site Utilities, Roads (include PG&E, JT), & Roads Phase 1-4 (Grade Site)			
Source 1: Grader - Sound level (dBA) at 50 feet =	85	40%	81.0
Source 2: Scraper - Sound level (dBA) at 50 feet =	84	40%	80.0
Source 3: Scraper - Sound level (dBA) at 50 feet =	84	40%	80.0
Calculated Data:			
All Sources Combined – L_{max} sound level (dBA) at 50 feet =			89 L_{max}
All Sources Combined – L_{eq} sound level (dBA) at 50 feet =			85 L_{eq}

Distance Between Source and Receiver (feet)	Geometric Attenuation [c] (dB)	Calculated L_{max} Sound Level (dBA) [d]	Calculated L_{eq} Sound Level (dBA) [d]
50	0	89	85
100 [a]	-6	83	79
150 [b]	*-10*	*80*	*76*
200	-12	77	73
250	-14	75	71
300	-16	74	70
350	-17	72	68
400	-18	71	67
500	-20	69	65
600	-22	68	64
700	-23	66	62
800	-24	65	61

Source: FHWA 2006.

[a] Results at 100 feet are bolded because this is the distance at which the threshold for construction noise in San Bruno applies.

[b] Results at 150 feet are italicized because this is the estimated distance to the nearest sensitive uses from the project perimeter.

[c] Geometric attenuation based on 6 dB per doubling of distance.

[d] This calculation does not include the effects, if any, of ground attenuation or local shielding from intervening walls, topography, or other barriers that may reduce sound levels further.

Non-Daytime Construction Noise

The only construction activities proposed outside of the standard daytime hours for construction in San Bruno are concrete pours. Concrete pours often must occur during nighttime hours because cooler temperatures and higher humidity levels provide better conditions for concrete curing. Equipment used for concrete pours would be staged at least 50 feet back from the project perimeter, resulting in all equipment being at least 200 feet from the nearest offsite residences (east of Huntington Avenue), and usually farther.

There would be approximately 100 individual instances of nighttime construction for concrete pour activities over the approximately 6-year construction period. Of the approximately 100 individual instances of nighttime concrete pours, an estimated 14 events are expected to occur within 500 feet of existing offsite residences. These would not all occur on back-to-back nights, with a maximum of three to four instances of nighttime construction expected to occur in a 1-week period during a worst-case week (when a mat lab pour takes place). Many of these instances of nighttime construction would actually be early morning construction, beginning at 5:00 a.m., and would not occur throughout the entire duration of a single night. Noise levels from a concrete mixer and two concrete pump trucks are estimated to be approximately 79 dBA L_{eq} at a distance of 100 feet, conservatively assuming 100 percent utilization of all three pieces of equipment (i.e., equipment is operating throughout the night without breaks). This noise level would be reduced to 73 dBA L_{eq} at a distance of 200 feet, which is the estimated worst-case distance to the nearest offsite residences. Table 3.10-13 provides the modeled combined noise levels from nighttime concrete pour activities at various distances from a given construction area.

Table 3.10-13.Estimated Construction Noise from Nighttime Concrete Pours (L_{max} and L_{eq})

Source Data	Maximum Sound Level (dBA)	Utilization Factor	L_{eq} Sound Level (dBA)
Construction Condition: Make Ready - Rough Grade, Site Utilities, Roads (include PG&E, JT), & Roads Phase 1-4 (Grade Site)			
Source 1: Concrete Mixer - Sound level (dBA) at 50 feet =	79	100%	79.0
Source 2: Concrete Pump - Sound level (dBA) at 50 feet =	81	100%	81.0
Source 3: Concrete Pump - Sound level (dBA) at 50 feet =	81	100%	81.0
Calculated Data:			
All Sources Combined – L_{max} sound level (dBA) at 50 feet =			85 L_{max}
All Sources Combined – L_{eq} sound level (dBA) at 50 feet =			85 L_{eq}

Distance Between Source and Receiver (feet)	Geometric Attenuation (dB) [c]	Calculated L_{max} Sound Level (dBA) [d]	Calculated L_{eq} Sound Level (dBA) [d]
50	0	85	85
100 [a]	-6	79	79
150	-10	76	76
200 [b]	*-12*	*73*	*73*
250	-14	71	71
300	-16	70	70
350	-17	68	68
400	-18	67	67

Source Data		Maximum Sound Level (dBA)	Utilization Factor	L_{eq} Sound Level (dBA)
500	-20	65	65	
600	-22	64	64	
700	-23	62	62	
800	-24	61	61	
900	-25	60	60	
1,000	-26	59	59	

Source: FHWA 2006.

[a] Results at 100 feet are bolded because this is the distance at which the threshold for construction noise in San Bruno applies.

[b] Results at 200 feet are italicized because this is the distance to the nearest sensitive uses from locations where nighttime concrete pour activities may occur.

[c] Geometric attenuation based on 6 dB per doubling of distance.

[d] This calculation does not include the effects, if any, of ground attenuation or local shielding from intervening walls, topography, or other barriers that may reduce sound levels further.

As shown in Table 3.10-13, reasonable worst-case combined construction noise during nighttime concrete pour activities (based on the assumptions described previously) is expected to be approximately 79 dBA L_{eq} at a distance of 100 feet from the noise source. This estimated noise level exceeds the City of San Bruno's 60 dBA criterion for nighttime construction noise generated 100 feet from construction activities (when construction takes place within 500 feet of a residential zone). Because construction noise from concrete pours during non-daytime hours may be in excess of the applicable criterion for nighttime construction noise, nighttime construction noise impacts would be considered ***significant*** and mitigation would be required.

Mitigation Measure NOI-1A requires the development of a Construction Noise Control plan to reduce noise from nighttime construction. Under this plan, measures to reduce noise from non-daytime construction activity would be implemented to reduce the project's significant impact related to non-daytime construction noise. While this mitigation measure would reduce construction noise effects, it may not be possible to reduce noise levels during all non-daytime construction activities to less-than-significant levels. For example, locating equipment as far as possible from noise-sensitive uses and equipping equipment with mufflers and sound control devices would reduce noise, but may not reduce noise to below significance criteria. In addition, because construction activities would occur during non-daytime hours for an estimated 100 days during project construction, the frequency of the nighttime construction noise would also be somewhat substantial. **Mitigation Measure NOI-1-B** includes the installation of a temporary construction noise barrier along the length of the project construction site near residential uses before nighttime construction activities take place within 500 feet of those residential uses. This measure would also reduce construction noise as experienced at nearby residences; such a barrier could reduce noise from construction to nearby receptors by up to approximately 5 dBA if the full line-of-sight between the noise source and the receiver is blocked. However, such a wall or barrier may not be feasible in all locations for all construction activities taking place before 8:00 a.m. (e.g., due to the need for construction trucks to enter or exit the site, and depending on the location of the pour activities). In addition, installing a temporary construction noise barrier may not reduce noise from all activities to below the applicable significance criterion at the nearest receptors, even if noise is somewhat reduced. Therefore, even with the implementation of feasible mitigation measures, this impact would be ***significant and unavoidable***.

Mitigation Measures

Mitigation Measure NOI-1-A: Develop a Construction Noise Control Plan to Reduce Noise Outside Standard Construction Hours.

The project applicant and/or the contractor(s) for the project shall obtain a permit to complete work outside the standard construction hours outlined in the San Bruno Municipal Code. In addition, the applicant and/or contractor(s) shall develop a construction noise control plan to reduce non-daytime construction noise levels to the extent feasible. Specifically, the plan shall include measures to reduce noise from project construction activities that occur between the hours of 10:00 p.m. and 7:00 a.m. such that, to the extent feasible, noise levels do not exceed 60 dBA as measured at 100 feet. Measures to help reduce noise from construction activity during non-standard construction hours to these levels shall be incorporated into this plan and may include, but are not limited to, the following.

- Plan for the noisiest construction activities to occur during daytime hours when the quantitative standards are less stringent and when people are less sensitive to noise.
- Require all construction equipment be equipped with mufflers and sound control devices (e.g., intake silencers and noise shrouds) that are in good condition (at least as effective as those originally provided by the manufacturer) and appropriate for the equipment.
- Maintain all construction equipment to minimize noise emissions.
- Locate construction equipment for concrete pours as far as feasible from nearby noise-sensitive receptors.
- Require all stationary equipment be located to maintain the greatest possible distance to the nearby existing buildings, where feasible.
- Require stationary noise sources associated with construction (e.g., generators and compressors) in proximity to noise-sensitive land uses to be muffled and/or enclosed within temporary enclosures and shielded by barriers, which can reduce construction noise by as much as 5 dB.
- Install noise-reducing sound walls or fencing (e.g., temporary fencing with sound blankets),such as required by **Mitigation Measure NOI-1-B** (around the perimeter of the project site near nighttime construction activities within 500 feet of existing residences), and/or around specific noise-generating equipment (e.g., generators or other stationary equipment) during nighttime/non-standard daytime hours.
- Prohibit the use of impact tools (e.g., jack hammers) during nighttime hours.
- Prohibit idling of inactive construction equipment for prolonged periods during nighttime/non-standard hours (i.e., more than 2 minutes).
- Reduce noise from back-up alarms (to the extent feasible without resulting in safety concerns) on construction vehicles and equipment by:
    - Providing a construction site layout that minimizes the need for reversing construction vehicles, or
    - Setting back-up alarm noise levels to the minimum necessary for safe operation, or
    - Using white-noise back-up alarms, when feasible and safe, or

- Using flagmen to keep the area behind maneuvering vehicles clear and minimize the time needed to back-up vehicles.

- Ensure that the main trucking routes for concrete trucks accessing the project site during non-daytime hours avoid residential areas to the extent possible.
- Provide advance notification in the form of mailings/deliveries of notices to surrounding land uses regarding the construction schedule, including the various types of activities that would be occurring throughout the duration of the construction period.
- Provide the name and telephone number of an onsite construction liaison through onsite signage and on the notices mailed/delivered to surrounding land uses. If construction noise is found to be intrusive to the community (i.e., if complaints are received), the construction liaison shall take reasonable efforts to investigate the source of the noise and require that reasonable measures be implemented to correct the problem.
- Use electric motors rather than gasoline- or diesel-powered engines during nighttime hours, when feasible.

Mitigation Measure NOI-1-B: Construct Temporary Noise Barrier Along the Project Perimeter Where Nighttime Construction Would Occur Within 500 Feet of Any Residential Receptor).

The contractor(s) shall install a temporary noise barrier along the length of the project perimeter where nighttime construction would occur within 500 feet of any residential receptor. The sound wall shall abut project construction activities and, wherever feasible, shall be located within the direct line-of-sight path between the noise source and nearby sensitive receptors; it shall be constructed in advance of any non-daytime project construction (i.e., construction that takes place between 10:00 p.m. and 7:00 a.m.) occurring within 500 feet of any sensitive receptor. The barrier shall be constructed of material that has a surface weight of at least 1 pound per square foot and has an acoustical rating of at least 25 Sound Transmission Class (STC). This can include a temporary barrier constructed with plywood supported on a wood frame, sound curtains supported on a frame, or other comparable material.

Construction Haul Truck Noise

During the most hauling-intensive subphases of project construction, up to 256 one-way haul or heavy truck trips per day would occur. The San Bruno Municipal Code does not include specific thresholds pertaining to construction truck noise. Therefore, anticipated daily construction truck noise was assessed to determine if a 3 dB increase over ambient noise levels, considered to be "barely perceptible," would occur.

The temporary addition of up to 256 one-way project-related heavy trucks per day on the local roadway network was analyzed to determine if hauling and heavy truck activity would result in substantial increases to the existing ambient noise levels at nearby sensitive land uses. Project trucks entering the project site would exit I-380 at El Camino Real, travel northbound on El Camino Real, turn right on Sneath Lane, turn right on Huntington Avenue, and enter the project site near the southeast corner of the site. To depart the project site, heavy trucks would use this route in reverse.

ADT noise levels with and without the addition of project haul truck trips (i.e., Existing versus Existing plus Haul Truck conditions) were modeled. The analysis assumed 256 one-way truck trips per day would travel along the analyzed haul route. Table 3.10-14 shows estimated worst-case traffic noise levels along analyzed roadway segments under Existing and Existing plus Haul Truck conditions.

Table 3.10-14.Existing and Existing plus Haul Truck Noise Levels

Roadway	Segment	Existing Noise Level (dBA L_{dn}) [a]	Existing plus Project Haul Truck Noise Level (dBA L_{dn}) [a]	Heavy Truck–Related Increase (dB)
El Camino Real	Between EB I-380 Ramps and WB I-380 Ramps	68.3	70.3	2.0
El Camino Real	Between WB I-380 Ramps and Tanforan Way	68.2	70.3	2.1
El Camino Real	Between Tanforan Way and Sneath Lane	69.8	70.3	0.5
Sneath Lane	Between El Camino Real and Sea Biscuit Avenue	64.7	65.7	1.0
Sneath Lane	Between Sea Biscuit Avenue and Marshalls/Cinemark Driveway	64.0	65.4	1.4
Sneath Lane	Between Marshalls/Cinemark Driveway and Huntington Avenue/San Bruno BART	63.7	65.1	1.4
Huntington Avenue	Between Sneath Lane/Huntington Avenue and San Bruno BART	64.7	66.0	1.3
Huntington Avenue	Between San Bruno BART and Tanforan Parking Structure	62.8	64.6	1.8
Huntington Avenue	Between Tanforan Parking Structure and Forest Lane	62.9	64.7	1.8

[a] Estimated noise levels were modeled at a distance of 50 feet for all segments.

BART = Bay Area Rapid Transit; dB = decibels; dBA L_{dn} = day-night sound level; EB = eastbound; I = Interstate; WB = westbound

As shown in Table 3.10-14, increases in traffic noise from construction truck activity along the truck route would be in the range of 0.5 to 2.1 dB. Therefore, a less than 3 dB increase in traffic noise levels would occur along all segments that comprise the project truck route (noting that a change of 3 dB is considered barely perceptible). In addition, during most subphases of construction, there would be fewer daily haul or heavy truck trips than presented in this analysis. For these reasons, temporary noise impacts related to project haul truck use would be ***less than significant***. No mitigation measures are required.

Impact NOI-1-B: Project operation would not generate 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 with Mitigation).

The project would introduce new operational noise sources. Typical operational noise sources evaluated here include project-generated traffic; heating, cooling and ventilation equipment; emergency generator testing; loading dock activity; vehicle activity in project parking structures (noise from subterranean parking garages would not result in meaningful noise increases aboveground); and amplified music or speech in outdoor gathering areas.

Traffic

Traffic noise increases along nearby roadway segments resulting from project development were quantitatively modeled using traffic volumes, existing vehicle-mix assumptions (i.e., the proportion of automobiles, trucks, buses, and other vehicles), and speed limits provided by the project traffic engineer (Fehr & Peers). Provided daily turn movements were converted into ADT volumes based on guidance from Fehr & Peers to multiply PM peak hour link volumes by 10. Traffic volumes were provided for Baseline, Baseline plus Project, Cumulative no Project, and Cumulative plus Project conditions. To evaluate direct traffic noise impacts associated with the project, modeling was conducted for Baseline and Baseline plus Project conditions to estimate traffic noise increases resulting from project implementation along roadway segments in the project vicinity.

When assessing traffic noise impacts, the following thresholds are applied to determine the significance of project-related traffic noise increases.

1. An increase of more than 5 dB is considered a significant traffic noise increase, regardless of the modeled baseline noise level.
2. In places where the baseline or resulting noise environment exceeds the land use compatibility standards and/or allowable noise level for the adjacent land uses (e.g., Baseline or Baseline plus Project noise levels are greater than 65 dBA for sensitive land uses), any noise increase greater than 3 dB is considered a significant traffic noise increase.

Prior to completing the quantitative traffic noise modeling, an initial screening analysis was conducted to determine which roadway segments would experience a 20 percent increase (or greater) in vehicle traffic resulting from project implementation. A 20 percent increase in traffic volumes would typically result in a 0.8 dB increase in traffic noise, which is much less than the 3 and 5 dB increase thresholds mentioned previously. Therefore, these roadways need not be quantitatively modeled to confirm a 3 dB or greater increase would not occur.

Traffic noise modeling along segments with at least a 20 percent increase in volumes attributable to the project was conducted using a spreadsheet based on the FHWA Traffic Noise Model, version 2.5, as described in the Methodology subsection of this report. Traffic noise was evaluated in terms of how project-related traffic noise increases could affect existing noise-sensitive land uses in the project area. Refer to Table 3.10-15 for a summary of the quantitative traffic noise modeling results for Baseline and Baseline plus Project conditions. Refer to Appendix 3.10-1, *Noise Technical Appendix*, for the complete traffic noise modeling results.

Table 3.10-15. Modeled Traffic Noise Levels

Roadway	Segment Location	Modeled Baseline Conditions (dBA L_{dn})	Modeled Baseline Plus Project Conditions (dBA L_{dn})	Change (dB)	3 dB Increase or Greater?
El Camino Real	North of EB I-380 Ramps	70.2	71.2	1.0	No
El Camino Real	North of Tanforan Way	70.3	71.3	1.0	No
El Camino Real	North of WB I-380 Ramps	71.0	72.2	1.2	No
El Camino Real	South of Sneath Lane	70.3	71.3	1.0	No
El Camino Real	South of Tanforan Way	71.0	72.2	1.2	No
El Camino Real	South of WB I-380 Ramps	70.2	71.2	1.0	No
Huntington Avenue	East of Huntington Avenue/San Bruno BART	68.3	69.5	1.2	No
Huntington Avenue	North of Forest Lane	66.2	67.1	0.9	No
Huntington Avenue	North of San Bruno Avenue	65.7	66.6	0.9	No
Huntington Avenue	North of San Bruno BART	68.5	69.7	1.2	No
Huntington Avenue	North of Tanforan Parking Structure	65.9	67.1	1.2	No
Huntington Avenue	South of Forest Lane	65.8	66.7	0.9	No
Huntington Avenue	South of San Bruno BART	66.8	68.0	1.2	No
Huntington Avenue	South of Tanforan Parking Structure	65.9	66.9	1.0	No
San Bruno Avenue	East of Huntington Avenue	64.5	65.3	0.8	No
San Bruno Avenue	West of San Mateo Avenue	64.5	65.3	0.8	No
Sneath Lane	East of Cherry Avenue	68.8	70.3	1.5	No
Sneath Lane	East of El Camino Real	67.1	68.6	1.5	No
Sneath Lane	East of Marshalls/ Cinemart Driveway	66.9	68.4	1.5	No
Sneath Lane	East of National Avenue	68.8	70.2	1.4	No
Sneath Lane	East of NB I-280 Ramps/Cemetery Driveway	65.5	67.0	1.5	No
Sneath Lane	East of Sea Biscuit Avenue	67.0	69.0	2.0	No
Sneath Lane	West of Cherry Avenue	68.5	70.1	1.6	No

Roadway	Segment Location	Modeled Baseline Conditions (dBA L_{dn})	Modeled Baseline Plus Project Conditions (dBA L_{dn})	Change (dB)	3 dB Increase or Greater?
Sneath Lane	West of El Camino Real	68.8	70.2	1.4	No
Sneath Lane	West of Huntington Avenue/San Bruno BART	66.8	68.4	1.6	No
Sneath Lane	West of Marshalls/ Cinemark Driveway	67.0	69.0	2.0	No
Sneath Lane	West of National Avenue	68.9	70.3	1.4	No
Sneath Lane	West of Rollingwood Drive	65.3	66.3	1.0	No
Sneath Lane	West of Sea Biscuit Avenue	66.6	68.1	1.5	No

Modeling results in this table are for roadway segments with at least a 20 percent increase in traffic volumes attributable to the project.

Modeled noise levels at a fixed distance of 50 feet from the roadway centerline.

BART = Bay Area Rapid Transit; dB = decibels; dBA L_{dn} = day-night sound level; EB = eastbound; I = Interstate; NB = northbound; WB = westbound

As shown in Table 3.10-15, traffic noise levels along evaluated roadway segments are estimated to increase by up to 2 dB based on the modeling results. Therefore, because all modeled traffic-related noise increases would be 2 dB or less, no roadway segment would experience a 3 or 5 dB increase in traffic noise resulting from project implementation. Because project-related traffic noise increases would be below the applicable significance criteria, operational traffic noise impacts would be considered ***less than significant***.

Heating, Cooling, and Ventilation Equipment

The makes and models of project heating, cooling, and ventilation equipment have not been finalized, and precise sound data for project-specific equipment are not currently known. However, reasonable assumptions regarding the types of equipment that would be located on which buildings, and the size and quantities of said equipment, were provided by the project applicant. Although makes, models, and noise specifications for proposed mechanical equipment are not known, an example case of reasonably foreseeable combined noise levels was modeled based on the types and quantities of equipment that are anticipated for the project. Note that the southeast portion of the project site (Flex Zone II) is the portion of the site closest to offsite sensitive uses. This area would likely be developed with life science/office uses under Scenario A (Maximum R&D Scenario) and a mix of residential and life science/office uses under Scenario B (Residential Scenario). Because this portion of the project site is located closer to offsite residential land uses than any other project area, mechanical equipment in this area is the focus on the reasonable worst-case mechanical equipment noise analysis.

Based on information provided by the project applicant on what might be reasonably assumed to occur in this flex zone, future project structures with mechanical equipment would be closer to offsite sensitive receptors under Scenario B compared to Scenario A. Therefore, Scenario B is the focus of the worst-case mechanical equipment noise assessment for the project. Specifically, under this scenario, rooftop mechanical equipment could be as close as 220 feet from offsite existing residences located east of Huntington Avenue. Refer to Appendix 3.10-1, *Noise Technical Appendix*, for specific modeling assumptions.

Noise levels were estimated for the following types of rooftop mechanical equipment that could potentially be located in Flex Zone II:

- 10 exhaust fans, ~46,00 cubic feet per minute (cfm) each
- Two exhaust air heat recovery units, ~184,000 cfm each
- Four air handling units, ~92,000 cfm each
- 205 2-ton direct expansion (DX) heat pump condensing units (one for each dwelling unit and one for the lobby)
- Two exhaust fans sized at 10,000 cfm each
- Two water cooled chillers, ~12,700 million BTUs/hour total (within mechanical penthouse)
- Three heating hot water pumps (within mechanical penthouse)
- Three chilled water pumps (within mechanical penthouse)
- Buffer tanks (within mechanical penthouse)

Note that the existing Target and associated parking lot north of this area would not change with project implementation, and no new noise-generating equipment would be added to these structures under the project. For the equipment modeled, levels were quantified for pieces where a presumed direct line-of-sight would occur between the equipment and the nearby residences east of Huntington Avenue. Estimated noise levels by equipment type were based on readily available data sources (e.g., FHWA and Hoover and Keith manuals). The analysis conservatively assumed that all equipment would operate simultaneously and would be located relatively close to one another. For equipment assumed to be located in mechanical penthouse (e.g., the chillers and pumps), 10 dB of attenuation was applied. For rooftop equipment, a 5 dB noise reduction was applied to account for attenuation from the edge of the roof.

Based on these modeling assumptions, the estimated combined noise from all equipment in Flex Zone II is approximately 81.1 dBA L_{eq} at the nearest residences east of Huntington Avenue, located approximately 220[4] horizontal feet from the nearest project buildings. Refer to Table 3.10-16 for the estimated combined noise levels of the heating, cooling, and ventilation equipment by modeled building location and overall for this quadrant of the project site.

Based on the noise measurement survey, the estimated average daytime ambient noise levels near this portion of the project site were in the range of 74 to 75 dBA L_{eq} (LT-4, LT-8 and LT-9); average nighttime noise levels in this area were in the range of 68 to 69 dBA L_{eq}; the lowest hourly noise level recorded in this area was 59.1 dBA L_{eq}. Depending on the time of day the equipment noise is generated, an 81.1 dBA L_{eq} estimated combined noise level could constitute a 6 to 7 dBA increase over ambient based on the daytime average ambient noise level, a 12 or 13 dBA increase or over ambient based on the nighttime average ambient noise level, or an over 22 dBA increase over ambient based on the lowest measured 1-hour noise level in this area (i.e., 59.1 dBA L_{eq}). Therefore, a greater than 10-dB increase over the ambient noise levels may occur in this area from the operation of project mechanical equipment.

[4] The noise level at the nearest residences is based on a distance of approximately 220 horizontal feet, and does not account for the vertical height of the future buildings.

Table 3.10-16.Estimated Heating, Cooling, and Ventilation Equipment Noise (Scenario B)

Type of Equipment	Quantity	dBA L_{eq} Noise at 50 Feet (assuming 100% utilization)	Located in a Room or Exterior?	Attenuation Based on Equipment Location (dB)	Attenuation from roof edge (due to 80-foot height)	Attenuated Noise by Equipment Type (dBA)	Source for Estimated Equipment Noise
Modeled Building in Southeastern portion of Flex Zone II							
Exhaust fans	10	79	Exterior	0	5	74	FHWA
Exhaust air heat recovery units	2	79	Exterior	0	5	74	H&K
Air handling units	4	75	Exterior	0	5	70	H&K
Chiller	2	71	Room	10	5	56	H&K
Hot water pump	3	81	Room	10	5	66	FHWA
Chilled water pump	3	81	Room	10	5	66	FHWA
Building Combined Equipment Noise at 50 feet						85.6	
Building Combined Equipment Noise at Nearest Residence (approximately 220 feet)						*72.8*	
Modeled Building in Northeastern Portion of Flex Zone II							
HVAC	205	74	Screen	5		69	H&K
Exhaust fans	2	75	Screen	5		70	FHWA
Residential Building Combined Equipment Noise at 50 feet						93.2	
Residential Building Combined Equipment Noise at Nearest Residence (approximately 220 feet)						*80.4*	
Combined Noise from Both Buildings at Nearest Residence (approximately 220 feet)						**81.1**	

Sources: Hoover and Keith 2000; FHWA 2006.
dB = decibels; dBA = A-weighted decibels; H&K = Hoover and Keith; HVAC = heating, ventilation, and air conditioning

As previously stated, the focus of the analysis is on the potential buildings located closest to offsite residences to ensure the estimated noise levels presented in this assessment are reasonably conservative. Noise levels from project equipment located on buildings further away from the nearest sensitive receptors would generally be lower due to distance and shielding. In addition, because this analysis is based on example equipment, actual noise levels could differ than those presented herein. However, it is possible that actual noise levels would be louder than predicted by the example model case presented previously. Therefore, because the modeled combined noise level is over 20 dB greater than the lowest nighttime noise level and over 10 dB greater than the average nighttime noise level recorded during the measurement survey, a greater than 10 dB increase in noise may occur during hours where background noise levels are lower. Consequently, project mechanical equipment noise may exceed the applicable 10 dB increase over ambient threshold, and impacts from heating, cooling, and ventilation equipment would be considered ***significant***.

Implementation of **Mitigation Measure NOI-1-C** would reduce this potentially significant impact related to heating, cooling, and ventilation equipment noise to a less-than-significant level by ensuring that project mechanical equipment would not result in noise levels that would be in excess of the applicable criterion in the City of San Bruno. This impact would be less than significant with mitigation.

Mitigation Measure NOI-1-C: Create a Mechanical Equipment Noise Reduction Plan.

To reduce potential noise impacts resulting from project heating, cooling, and ventilation equipment, the project applicant shall conduct a noise analysis to estimate noise levels of project-specific mechanical equipment based on the selected equipment models and design features, and create a Noise Reduction Plan to ensure noise levels of equipment, once installed, are below the noise applicable criteria.

The Noise Reduction Plan shall include any necessary noise reduction measures required to reduce project-specific mechanical equipment noise to a less-than-significant level. The plan shall also demonstrate that with the inclusion of selected measures, noise from equipment would be below the significance thresholds (i.e., would not result in a greater than 10 dB increase in the ambient level at sensitive land uses). Feasible measures to reduce noise below the significance threshold include, but are not limited to, selecting quieter equipment, using silencers and acoustical equipment at vent openings, siting equipment farther from the roofline, and/or enclosing all equipment in a mechanical equipment room designed to reduce noise. This analysis shall be conducted, and the results and final Noise Reduction Plan shall be provided to and approved by the City Community Development Department, prior to the issuance of building permits for each building and/or phase of development.

The noise analysis and Noise Reduction Plan shall be prepared by persons qualified in acoustical analysis and/or engineering. The Noise Reduction Plan shall demonstrate with reasonable certainty that noise from mechanical equipment selected for the project, including the attenuation features incorporated into the project design, will not exceed the City of San Bruno threshold of 10 dB above the ambient noise level at the property plane of any property.

The project applicant shall incorporate all feasible methods to reduce noise identified and any other feasible recommendations from the acoustical analysis and Noise Reduction Plan into the building design and operations as necessary to ensure that noise sources meet applicable requirements of the respective noise ordinances at receiving properties.

Emergency Generator Testing

Emergency generators included in the project could result in the generation of audible noise during testing. Noise from the operation of emergency generators during an emergency is typically exempt from local ordinances. However, even though the testing of emergency generators is typically a short-term (i.e., less than 1 hour) and intermittent process (usually once per month), noise resulting from generator testing is compared to local noise limits for operational equipment noise to evaluate expected compliance. Generator testing typically would be conducted once per month per generator for approximately 30 minutes, and once yearly for up to 60 minutes, between the hours of 7:00 a.m. and 10:00 p.m. only. Noise from emergency generator testing would be subject to the regulations in the City of San Bruno that pertain to mechanical equipment noise. Specifically, the San Bruno noise standards allow for an up to 20 dB increase over ambient conditions during daytime hours for noise that occurs for no more than 30 minutes in any 24-hour period, and a 10 dB increase over ambient conditions during daytime hours for noise sources that occurs for more than 30 minutes per day. Since generator testing would occur for up to 1 hour per generator at least annually (with monthly testing generally taking place for 30 minutes per generator per day), this analysis considers a 10 dB increase over the ambient noise level to be a significant impact.[5]

The project applicant has specified that at this time, it is anticipated that Scenario A would include the installation of approximately 19 emergency generators, ranging in capacity from 250 kilowatts (kW) to 2,250 kW. Under Scenario B, the project would be anticipated to include the installation of 17 emergency generators, also ranging in capacity from 250 kW to 2,250 kW. All generators would be located in outdoor service yards throughout the project site under both scenarios. General locations for the proposed generators under both scenarios have been identified by the project applicant and are included in Appendix 3.10-1, *Noise Technical Appendix*. Although the final make and models of the generators have not been selected, specification data for similar generators can be used to estimate generator noise. Note that specific details about generator shielding and the precise attenuation features for the project generators are not known with certainty at this time. Because the type and sound rating of future shielding or exhaust mufflers is unknown, this analysis is conservatively based on unattenuated generator noise levels. Generator specification sheets including noise data were reviewed for generators of the same or similar capacity as those proposed under the project.

Based on the review of these specification sheets, estimated worst-case (unattenuated) generator noise levels by generator size resulting from project generators during testing are as follows.

- A 250 kW generator (Cummins 250DQGAA; Cummins, Inc. 2023) could produce an unattenuated noise level of 88.8 dBA at 50 feet.
- A 500 kW generator (Cummins 500DFEK; Cummins, Inc. 2019) could produce an unattenuated noise level of 101.5 dBA at 50 feet.[6]

[5] Note that, according to the Municipal Code, the ambient noise level may be exceeded by 20 dB, between 7 a.m. and 10 p.m., for a period not to exceed thirty minutes during any 24-hour period; however, because generator testing of each generator would take place for more than 30 minutes at a time at least once annually, the more stringent 10-dB over ambient threshold is used in this assessment.

[6] Generator noise data could not be sourced for a 350 kW generator. In this case, noise data for a 500 kW generator were used to conservatively estimate unattenuated engine and exhaust noise for a 350 kW generator.

- A 1,500 kW generator (Cummins 1500DQGAF; Cummins, Inc. 2017a) could produce an unattenuated noise level of 105.6 dBA at 50 feet.[7],
- A 1,750 kW generator (Cummins 1750DQKAD; Cummins, Inc. 2017b) could produce an unattenuated noise level of 97.1 dBA at 50 feet.
- A 2,000 kW generator (Cummins 2000DQKAE; Cummins, Inc. 2017c) could produce an unattenuated noise level of 98.1 dBA at 50 feet.
- A 2,250 kW generator (Cummins 2250DQKAF; Cummins, Inc. 2017d) could produce an unattenuated noise level of 99.1 dBA at 50 feet.

Estimated noise levels from each generator under both scenarios were modeled to determine which scenario would result in the greatest generator noise levels at nearby sensitive land uses. Based on this analysis, worst-case generator testing noise would result from testing of the 1,600 kW generator located in Flex Zone II under Scenario A. Refer to Appendix 3.10-1, *Noise Technical Appendix*, for full modeling results as well as generator specification data used in this analysis for both scenarios. Table 3.10-17 summarizes worst-case generator modeling results by generator location and the anticipated noise levels at the nearest sensitive receptors for each generator under Scenario A. In addition, this table includes the estimated existing ambient noise level (average daytime L_{eq}) at nearby sensitive uses based on the results from the noise measurement survey. These existing ambient noise levels are used to determine the appropriate dB threshold at each location based on the City's 10-dB increase over ambient limit for mechanical equipment noise.

As described in Section 3.10.3.2, *Methodology and Approach*, generator noise was evaluated to determine if a 10 dB increase in ambient noise would occur at nearby residences based on the noise thresholds that apply to mechanical equipment in the City of San Bruno. The 1,600 kW generator located in Flex Zone II of Scenario A is estimated to produce the loudest noise level at nearby sensitive receptors. This generator would be approximately 375 feet away from the nearest residential properties along Huntington Avenue east of the project site. At this distance, unattenuated noise levels from the testing of this generator are estimated to be 88.1 dBA. The average noise level measured during daytime hours (7:00 a.m. to 10:00 p.m.) near these residences along Huntington Avenue was 70.6 dBA L_{eq} (LT-4). Therefore, if generator-testing noise was to exceed 80.6 dBA at these residences, generator noise impacts would be considered significant.

The 88.1 dBA noise level presented previously would constitute a 17.5 dB increase over the ambient noise level, or a 7.5 dB increase over the allowable noise level based on ambient noise levels near these sensitive receptors. Therefore, generator noise impacts at this location would be considered significant. Generator noise levels during testing from several other project generators, under both scenarios, would have the potential to exceed the 10 dB above ambient threshold. As shown in Table 3.10-17, seven generators out of the proposed 19 generators under Scenario A were modeled to result in noise levels of greater than 10 dB above ambient at the nearest sensitive uses. In addition, because final makes and models of generators have not been selected and example equipment noise levels were used in this assessment, it is possible that generator testing noise could result in exceedances at other locations that are not specifically shown in Table 3.10-17. Therefore, impacts related to generator noise testing would be considered ***significant***.

[7] Generator noise data could not be sourced for a 1,600 kW generator. In this case, noise data for a 1,500 kW generator were used to conservatively estimate unattenuated engine and exhaust noise for a 1,600 kW generator, because source noise data indicates it would be louder than source data for a 1,750 kW generator.

Table 3.10-17. Estimated Generator Testing Noise at Sensitive Uses for Scenario A

Generator Location	Generator Size	Sound Pressure at 50 Feet [a]	Nearest Sensitive Receptor?	Nearest Receptor Distance [b] (feet)	Decibel Attenuation (dB) due to Distance	Sound Pressure at the Nearest Receptor	Measured Existing Ambient (average daytime L_{eq}) [c]	Ambient Plus 10 dB Threshold	Exceeds Threshold?
Residential 1	500 kW	101.5	Residences east of Project Site	760	-23.6	77.9	69.0 [e]	79.0	No
Residential 2	250 kW	88.8	Residences east of Project Site	600	-21.6	67.2	69.0 [e]	79.0	No
Residential 3	250 kW	88.8	Sonesta ES Suites Hotel north of Project Site	355	-17.0	71.8	66.9 [f]	76.9	No
Building 1	**1,600 kW [d]**	**105.6**	**Avalon Apartments west of Project Site**	**730**	**-23.3**	**82.3**	**69.1 [g]**	**79.1**	**Yes**
	2,000 kW	98.1	Avalon Apartments west of Project Site	730	-23.3	74.8	69.1 [g]	79.1	No
Building 2	**1,500 kW**	**105.6**	**Avalon Apartments west of Project Site**	**755**	**-23.6**	**82.0**	**69.1 [g]**	**79.1**	**Yes**
	1,750 kW	97.1	Avalon Apartments west of Project Site	755	-23.6	73.5	69.1 [g]	79.1	No
Building 3	1,750 kW	97.1	Residences south of Project Site	670	-22.5	74.6	69.8 [h]	79.8	No
	2,250 kW	99.1	Residences south of Project Site	670	-22.5	76.6	69.8 [h]	79.8	No
Flex Zone I	**1,500 kW**	**105.6**	**Avalon Apartments west of Project Site**	**590**	**-21.4**	**84.2**	**69.1 [g]**	**79.1**	**Yes**
	1,750 kW	97.1	Avalon Apartments west of Project Site	590	-21.4	75.7	69.1 [g]	79.1	No
Flex Zone I	**1,500 kW**	**105.6**	**Avalon Apartments west of Project Site**	**555**	**-20.9**	**84.7**	**69.1 [g]**	**79.1**	**Yes**
	1,750 kW	97.1	Avalon Apartments west of Project Site	555	-20.9	76.2	69.1 [g]	79.1	No
Flex Zone I	**1,500 kW**	**105.6**	**Avalon Apartments west of Project Site**	**870**	**-24.8**	**80.8**	**69.1 [g]**	**79.1**	**Yes**
	1,750 kW	97.1	Avalon Apartments west of Project Site	870	-24.8	72.3	69.1 [g]	79.1	No
Flex Zone II	**1,600 kW [d]**	**105.6**	**Residences east of Project Site**	**380**	**-17.6**	**88.0**	**70.6 [i]**	**80.6**	**Yes**
	2,000 kW	98.1	Residences east of Project Site	380	-17.6	80.5	70.6 [i]	80.6	No
Flex Zone II	**1,600 kW [d]**	**105.6**	**Residences east of Project Site**	**375**	**-17.5**	**88.1**	**70.6 [i]**	**80.6**	**Yes**
	2,000 kW	98.1	Residences east of Project Site	375	-17.5	80.6	70.6 [i]	80.6	No

Note: Generator testing would occur one at a time, for up to 60 minutes.

Bold text denotes generators that were modeled to result in a greater than 10-dB increase over the existing ambient noise level.

[a] Generator noise levels presented herein include both engine and exhaust noise, and are presented as L_{eq} noise levels based on 100% utilization (which is equal to the L_{max} noise level).

[b] Distances are based on a google earth overlay of available site plans and measured to the nearest offsite receptor. Within the flex zones, distances are assumed based on reasonably foreseeable building types and locations provided by the project applicant for the purposes of analysis under CEQA. See Appendix 3.10-1, *Noise Technical Appendix*, for complete modeling assumptions and results.

[c] This is based on the nearest measured daytime average from 7:00 a.m. to 10:00 p.m.

[d] Due to the lack of sound data for 1,600 kW generators, these generators. are conservatively modeled using sound data for a 1,500 kW generator because source noise data indicates it would be louder than source data for a 1,750 kW generator (the next closest size for which source data was available).

[e] Represented by the average Daytime L_{eq} at LT-3 (69.0 dBA L_{eq}).

[f] Represented by the average Daytime L_{eq} at LT-2 (66.9 dBA L_{eq}).

[g] Represented by the average Daytime L_{eq} at LT-6 (69.1 dBA L_{eq}).

[h] Represented by the average Daytime L_{eq} at LT-5 (69.8 dBA L_{eq}).

[i] Represented by the average Daytime L_{eq} at LT-4 (70.6 dBA L_{eq}).

Implementation of **Mitigation Measure NOI-1-D** requires that emergency generators be selected, attenuation features (e.g., exhaust mufflers) be used, and generator enclosures be designed such that noise from generator testing is reduced to within allowable levels. Implementation of this mitigation measure would reduce this potentially significant impact to a less-than-significant level. Noise impacts related to emergency generator testing would be ***less than significant with mitigation***.

Mitigation Measure NOI-1-D: Develop Emergency Generator Noise Reduction Plan.

Prior to approval of a building permit for each building with an emergency generator, the applicant shall conduct a noise analysis to approximate noise levels from the testing of project-specific emergency generators, based on the final makes and models of generators selected, and any design features or noise attenuation features to be included, on a per-building basis. Subsequently, a Generator Noise Reduction Plan shall be completed to ensure noise levels of generator testing would be below the applicable criteria in San Bruno (i.e., would not result in a greater than 10 dB increase over the ambient level at nearby sensitive uses during testing). Based on measured existing noise levels near the project site from 2024, existing average daytime noise levels are in the range of 69 to 71 dBA L_{eq}, resulting in an applicable threshold for generator testing noise of approximately 79 to 81 dBA L_{eq} (depending on the location of the generator, and the location of the nearest offsite properties). However, additional ambient noise measurements may be conducted as part of the Generator Noise Reduction Plan to further refine the applicable threshold. The results of the aforementioned analysis and the final Generator Noise Reduction Plan shall be provided to and approved by the City Community Development Department prior to the issuance of a building permit for each building with an emergency generator. The analysis shall account for proposed noise attenuation features, such as specific acoustical enclosures and mufflers or silences, and the final Noise Reduction Plan shall demonstrate with reasonable certainty that proposed generator(s) will not exceed the City of San Bruno threshold of 10 dB above the ambient noise level.

- Installing relatively quiet models of generator(s).
- Orienting or shielding generator(s) to protect noise-sensitive receptors to the greatest extent feasible.
- Installing exhaust mufflers or silencers.
- Increasing the distance between generator(s) and noise-sensitive receptors.
- Placing barriers around generator(s) to facilitate the attenuation of noise.

In addition, all project generator(s) shall be tested only between the hours of 7:00 a.m. and 10:00 p.m.

Loading Dock Activity

In general, the loading and unloading of goods is a common occurrence in cities and urban environments. The project site is in an urban environment near a freeway (I-380) and major thoroughfares (e.g., El Camino Real). Measured existing noise levels at the project site and at nearby sensitive uses were in the range of 71 to 76 dBA L_{dn}. The potential for loading activity increases at the site associated with the project to result in noise impacts on nearby sensitive uses was evaluated qualitatively, based on the likelihood for substantial increases in ambient noise to occur.

Loading would occur under the project for the general office uses, R&D center, the retail and cinema use, and the hotel. The site is currently developed with a shopping center, and loading currently takes place at the site. For the project, all loading docks would be located internal to buildings and/or parking garages. As a result, loading dock noise is not anticipated to generate substantial noise external to the project buildings. In addition, according to the project traffic engineer, usage at each loading dock would be fairly minor because the project land uses are not substantial truck generators (e.g., distribution centers). Commercial loading would typically occur during daytime hours, with the nearest loading dock under Scenario B located at least 300 feet (and usually much more) from the nearest offsite noise-sensitive receptors; the nearest loading dock under Scenario A would be even further from sensitive uses.

Because the project site is in an urban area with elevated existing noise levels, because loading activities would take place internal to project buildings and would be temporary, intermittent, and occur primarily during daytime hours, and because loading would be located an estimated 300 feet or more from offsite noise-sensitive land uses, noise impacts from intermittent loading activities for the project would be ***less than significant***.

Parking Activity

The project would include new parking structures, parking within the existing Target and cinema structures, and parking within the three residential buildings. Scenario A could include the development of a parking structure in Flex Zone II, which would locate parking areas closer to offsite noise-sensitive uses compared to Scenario B. Therefore, worst-case parking garage noise from Scenario A is the focus of this analysis. The potential parking structure in Flex Zone II under Scenario A is assumed to include six levels of aboveground parking with a total capacity of approximately 975 parking stalls based on information from the project applicant for purposed of CEQA analysis.

Noise from parking areas is temporary and periodic. According to FTA's *Transit Noise and Vibration Impact Assessment Manual* (FTA 2018) 1,000 cars in a peak activity hour generate a sound equivalent level (SEL) of 92 dBA at 50 feet, which can be converted to an hourly L_{eq} (average) noise level of 56.4 dBA L_{eq} at 50 feet. Note that this noise level is based on vehicles operating in an open area and does not account for noise attenuation from solid walls associated with a parking garage. The edge of the modeled parking garage in Flex Zone II would be at least 200 feet from the nearest offsite receptor east of Huntington Avenue. This distance was conservatively modeled for the entire parking garage.

Although it is not known how many vehicles would use the parking garage during a peak hour, this analysis conservatively assumed 975 vehicles (or the maximum capacity of the garage) would use the garage at once. Without accounting for any shielding from the parking garage, parking garage noise from 975 cars operating simultaneously at a distance of 200 feet would be approximately 44.3 dBA L_{eq}. The estimated noise level would be well below the existing daytime average noise levels near this parking garage, which were in the range of 70 to 71 dBA L_{eq} (LT-4, LT-8 and LT-9). Estimated parking garage noise from Flex Zone II would, therefore, be approximately 26 to 27 dBA below measured existing ambient noise levels during daytime hours.

Parking/Field House 1 in the programmed area would have an expected capacity of 1,435 parking spots and would be 500 feet from the nearest noise-sensitive uses (residences south of I-380). Existing ambient noise levels in that area (LT-5) were similar, with an average daytime noise level of approximately 70 dBA L_{eq}. Conservatively assuming 1,435 vehicles (or the maximum capacity of the

garage) would use the garage at once, and without accounting for any shielding from the parking garage, parking garage noise from Parking/Field House 1 would be an estimated 38 dBA L_{eq} at the nearest sensitive uses located 500 feet away. This is approximately 32 dBA below the existing ambient noise level in this area of approximately 70 dBA L_{eq}.

Because estimated project parking garage noise levels at nearby sensitive uses would be well below existing measured noise levels, noise impacts associated with project parking activity would be considered ***less than significant***.

Amplified Music or Speech at Events

The project would include several outdoor gathering areas that would be used for informal gathering, outdoor dining, and temporary programming and events. Temporary programming and events could use amplified sound but would be relatively infrequent in nature and would be subject to regulation under San Bruno Municipal Code Chapter 6.16, Noise Regulations. Programmed events at the site may occur an estimated once per month and are most likely to take place in the central green area within the retail center of the site. These programmed events could include both live and recorded amplified music (both live and recorded), public speech, and movie screenings. Events with large crowds and public speakers, such as a holiday celebration or grand opening event, could occur at the site an estimated once or twice per year.

According to the project applicant, any programmed events that include amplified sound will comply with San Bruno's noise regulations that limit sound-amplifying equipment for use only between 8:00 a.m. and 8:00 p.m. Monday through Saturday and between 10:00 a.m. and 8:00 p.m. on Sundays and legal holidays, per Municipal Code Section 6.16.160. This section of the Municipal Code also contains quantitative standards for noise generated by amplified equipment. Specifically, noise levels from sound-amplifying equipment shall not exceed 15 dB above the ambient base noise level as measured at a distance of 100 feet from the sound source.

Noise levels from project programming and events is estimated based on previous measurements of events with amplified music or speech. Noise from human speech being amplified by a single loudspeaker has been measured in the range of approximately 56 to 58 dBA L_{eq} at 100 feet,[8] whereas noise from a small live band, which included a guitar and vocalists with a single amplifier has been measured to be approximately 65 dBA L_{eq} at 100 feet. [9] These previously recorded noise levels are expected to be reasonably representative of the temporary project-related programming or events, which may include sound amplification.

Average existing daytime noise levels recorded in the project area were in the range of 67 to 71 dBA L_{eq}; 15 dB above this level would be approximately 82 to 86 dBA. Based on the noise levels presented previously (i.e., 56 to 65 dBA L_{eq} at 100 feet), noise from sound-amplifying equipment at project-related programming or events would not be expected to exceed 15 dB above the ambient base noise level at a distance of 100 feet from the sound source. Noise impacts from amplified music for events associated with the project would be ***less than significant***.

[8] Wedding noise: Noise measured at approximately 140 feet from an individual officiating over a wedding (single speaker) was measured to be between approximately 55 and 56 dBA L_{eq}, equating to a noise level of 58 to 59 dBA L_{eq} at 100 feet.

[9] Acoustic band noise: Noise measured at approximately 73 feet from a small live band with a single amplifier that included a guitar and vocals was measured to be 67.5 dBA L_{eq}, equating to 64.8 dBA L_{eq} at 100 feet.

Impact NOI-2: The project would not generate excessive groundborne vibration or groundborne noise levels (Less than Significant).

Building/Structure Damage

Construction of the project would involve the use of construction equipment that could generate groundborne vibration. Typical vibration levels associated with heavy construction equipment proposed for use under the project at a reference distance of 25 feet, and other distances, are shown in Table 3.10-18. Note that PPV is a measure of the peak instantaneous vibration level, rather than an average, so the overall maximum vibration level from project construction would be governed by the most vibration-intensive equipment proposed for use. Vibration from equipment operating simultaneously would not be expected to combine to raise the overall peak vibration level experienced at a nearby sensitive use. The most vibration-intensive piece of construction equipment proposed for use during project construction under both Scenario A and Scenario B is a Caterpillar 815 Compactor.

Table 3.10-18. Vibration Levels for Construction Equipment

Equipment	PPV in/sec at 25 Feet	PPV in/sec at 50 Feet	PPV in/sec at 200 Feet
Vibratory roller [a]	0.210	0.074	0.009
Large bulldozer	0.089	0.031	0.004
Loaded trucks	0.076	0.027	0.003
Small bulldozer	0.003	0.001	0.000

Source: FTA 2018.

[a] Considered to be representative of a Caterpillar 815 Compactor.

PPV (in/sec) = peak particle velocity (inches per second)

Because the most vibration-intensive equipment proposed for use under both scenarios is the same and because the overall project footprint is also the same under both scenarios, this vibration impact analysis applies to both Scenario A and Scenario B. The compactor mentioned previously is conservatively assumed to generate vibration levels similar to a vibratory roller for the purposes of this analysis. It is assumed that this equipment could operate anywhere on the project site under both scenarios.

To determine if construction activities have the potential to damage nearby buildings or structures, vibration levels at nearby receptors were calculated using source vibration levels and the attenuation equation $PPV = PPV_{ref} \times (25/distance)^{1.5}$ from the FTA guidance (FTA 2018). The calculated values were then compared to the appropriate structural damage criteria, which vary according to structure type.

Project construction would take place at least 25 feet from the nearest offsite existing structure, the BART parking garage west of Hunting Avenue East and south of Sneath Lane. Therefore, this analysis assumes that vibration-generating construction equipment, including a compactor, could operate as close as 25 feet from the nearest offsite structure. This BART parking lot is primarily concrete and does not appear to be particularly sensitive to vibration. Therefore, the most similar structure type from the Caltrans vibration-related damage criteria for structural damage is a “modern industrial/commercial building,” with a damage criterion of 0.5 PPV in/sec for continuous sources of vibration.

At a distance of 25 feet, a compactor (represented by a vibratory roller) can generate 0.21 PPV in/sec, as shown in Table 3.10-18, which is below the Caltrans damage criterion for "modern industrial/commercial buildings" of 0.5 PPV in/sec. Note that this vibration level is also below the criterion for "new residential structures" (also 0.5 PPV in/sec), "older residential structures" (0.3 PPV in/sec), and "historic and some old buildings" (0.25 PPV in/sec). Because vibration levels from the most vibration-intensive equipment would be below the applicable damage criteria at nearby existing structures, vibration-related damage effects are not anticipated to occur. In addition, because of the size of the site, project construction equipment would often be operating even farther from the nearest existing buildings, resulting in even lower vibration levels.

Because project construction equipment would not result in vibration levels in excess of the applied damage criterion at the nearest offsite structures, vibration-related damage impacts would be ***less than significant***.

Vibration-Related Annoyance

Regarding annoyance-related vibration impacts, a significant vibration impact related to sleep disturbance could occur when nighttime construction activities generate vibration levels that are strongly perceptible (i.e., 0.1 PPC in/sec) (Table 3.10-4) at locations where people sleep for a prolonged period of time. Sleep disturbances from vibration typically occur only if residences are very close to nighttime ground-disturbing construction activities. The nearest residential land uses to the project site are located approximately 150 feet east of the southeastern portion of the project site.

The only construction activities proposed for nighttime hours are concrete pours. Equipment used for concrete pours would be staged at least 50 feet back from the project perimeter, resulting in all equipment being at least 200 feet from the nearest offsite residences (east of Huntington Avenue). Usually, equipment would be staged even further from the nearest offsite residences. In addition, note that the equipment used during concrete pours (e.g., concrete mixers and pumps) rarely generates perceptible levels of vibration outside of the immediate vicinity of the equipment.

Concrete mixers and concrete pumps generally generate lower vibration levels than a small bulldozer, which is the piece of equipment in the FTA list of vibration source levels with the lowest level of vibration (Table 3.10-18). A small bulldozer would result in a very low vibration level of approximately 0.0001 PPV in/sec at a distance of 200 feet. This level is well below the strongly perceptible threshold of 0.1 PPV in/sec from the Caltrans guidelines for the evaluation of vibration-induced annoyance (Table 3.10-4); in fact, this level is well below the barely perceptible threshold of 0.01 PPV in/sec. When nighttime construction occurs at greater distances from nearby residences, nighttime vibration levels would be even lower. For these reasons, vibration impacts from project construction related to annoyance and sleep disturbance would be ***less than significant***.

Impact NOI-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 2 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 (Less than Significant with Mitigation).

The project site is located approximately 1 mile from SFO and is within the 70 dBA CNEL contour for the airport, as shown in Figure 3.10-2. Therefore, ambient noise levels at the portions of the project site within the 70 dBA CNEL contour are expected to be in the range of 70 to 75 dBA CNEL. This is consistent with ambient noise levels measured for this EIR analysis, as shown in Table 3.10-17.

The project site is included as housing opportunity Site 20 in the San Bruno Housing Element, and was analyzed as housing opportunity site 14 in the Housing Element Initial Study/Mitigated Negative Declaration (IS/MND) (City of San Bruno 2023). As discussed in this document, the project would be required to comply with *San Bruno General Plan* policies pertaining to aircraft noise, including HS-33 (preventing the placement of new noise sensitive uses in areas with excessive noise unless adequate mitigation is provided), HS-35 (requiring developers to comply with relevant noise insulation standards contained in Title 24 of the California Code of Regulations), HS-37 (requiring that all sponsors of new housing record a notice of Fair Disclosure regarding the proximity to SFO and of potential impacts of aircraft operation, including noise impacts), HS-40 (requiring Local Agency Override consistent with Public Utilities Code Section 21674.1(d) for new residential development within the SFO's 70 dBA CNEL contour), and HS-42 (requiring new residential development within the 65 dBA CNEL SFO noise contour to submit an avigation easement to the airport). Compliance with these policies would help reduce impacts related to aircraft noise at proposed residential land uses under the project.

Policy NP-4 from the ALUCP states that residential uses are not compatible in areas exposed to noise above CNEL 70 dB and typically should not be allowed in these high noise areas. Policy NP-4.1 of the ALUCP allows residential uses in areas exposed to noise above CNEL 70 dB only if the proposed use is on a lot of record zoned exclusively for residential use as of the effective date of the ALUCP, and if the residential use is sound-insulated to achieve an indoor noise level of CNEL 45 dB or less from exterior sources. The project site is not zoned exclusively for residential use; however, noise insulation methods are available to reduce aircraft noise levels at the project site to achieve an indoor noise level of 45 dB CNEL or less.

Because the development of housing on the project site would be inconsistent with ALUCP Policy NP-4 due to the location of the site within the 70 dBA CNEL contour, the project would be expected to receive a determination of inconsistency from ALUC and require a Local Agency Override by the San Bruno City Council. As discussed in Chapter 2, *Project Description*, the anticipated Local Agency Override is included as a discretionary approval for the project, the potential environmental effects of which are evaluated throughout this EIR. Although the project would require this Local Agency Override, the Noise and Vibration Assessment for the City of San Bruno Housing Element Update (Appendix B of the IS/MND) stated that future residential development at this site would be able to achieve a 45 dB CNEL interior noise level (City of San Bruno 2023). In addition, compliance with the aforementioned general plan policies and California Title 24 would prohibit the issuance of occupancy permits for residential development that would expose future residents to an interior noise level of greater than 45 dB CNEL. Accordingly, the San Bruno City Council found housing at the project site (up to 1,000 dwelling units) to be conditionally acceptable with appropriate noise controls in adopting the Housing Element update. While the project would include up to 500 more housing units than what was evaluated in the Housing Element ISMND, the rationale supporting the finding remains the same, since noise controls would be required for all units, regardless of the total unit count.

However, to ensure interior noise levels are reduced to 45 dBA CNEL or lower, the use of special building materials that provide a greater level of sound attenuation (i.e., higher sound transmission class, or STC, windows and walls) may be required. Because the building materials for the project have not been determined, it cannot be guaranteed that interior noise levels would be reduced to the extent necessary, such that interior noise levels do not exceed 45 dBA CNEL at project residences. Accordingly, noise impacts related to aircraft noise and future residential land uses under the project would be considered ***significant***, and mitigation would be required.

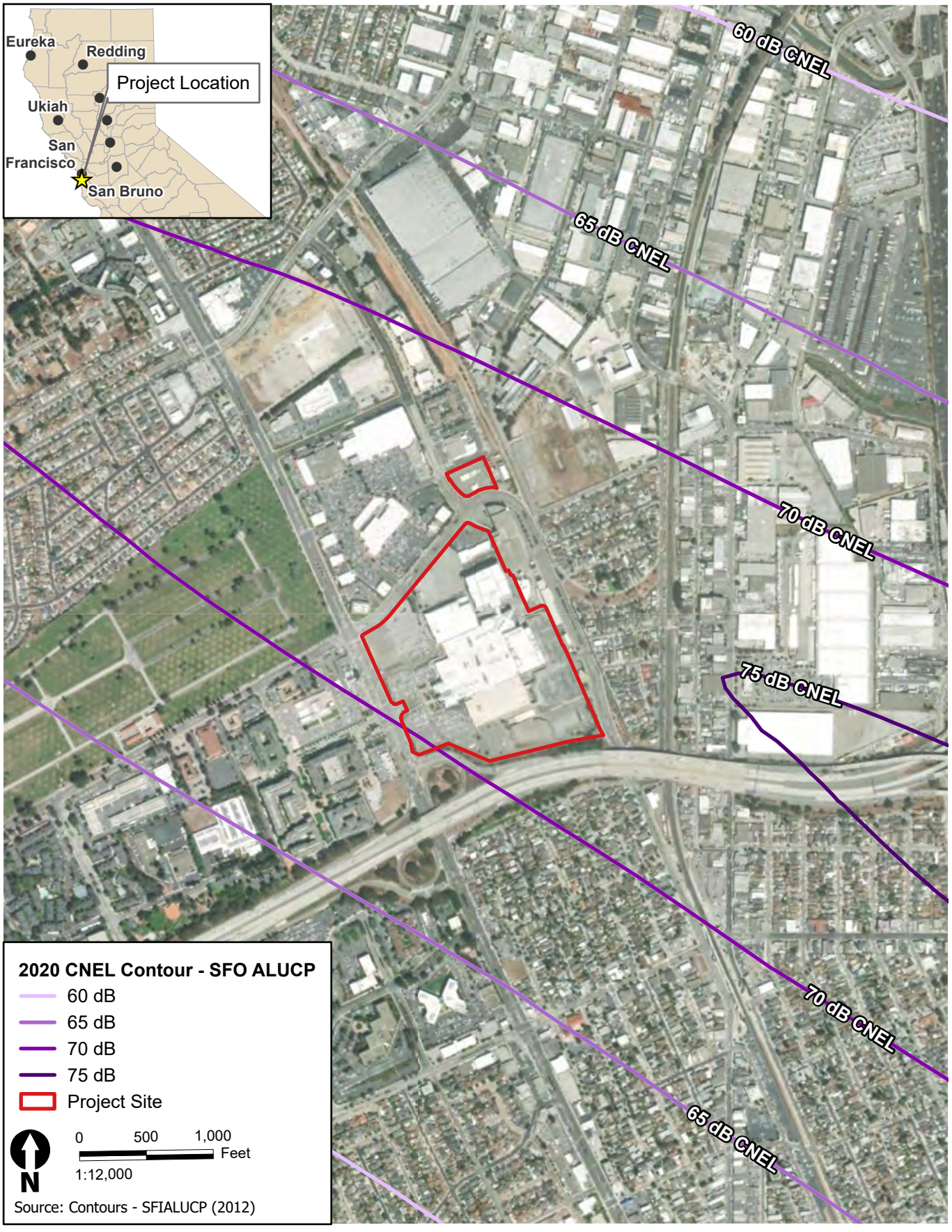

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Figure 3.10-2
ALUCP Airport Noise Contours

Mitigation Measure NOI-3 would require building materials be selected and residential units be designed such that interior noise levels would be below 45 dBA CNEL. With implementation of this mitigation measure, and adoption of a Local Agency Override, the siting of residential land uses at the project site would not result in the exposure of future residents to excessive noise levels, even though the project would be inconsistent with the noise compatibility policies from the ALUCP. Noise impacts related to aircraft noise would be considered ***less than significant with mitigation***.

Mitigation Measure NOI-3: Develop Airport Noise Reduction Plan for Residential Dwellings.

The project applicant shall retain an acoustical engineer to conduct a noise analysis and generate a Noise Reduction Plan that determines the treatments and measures necessary to ensure interior noise levels (attributable to exterior sources) in any habitable room associated with project residences would be 45 dBA CNEL, or less. Because the project site is within the 70 dBA CNEL contour for SFO, and because existing measured noise levels in 2024 on the project site were in the range of 73 to 76 dBA CNEL (based on measurements LT-1, LT-8 and LT-9), the use of acoustical design features would be required to ensure interior noise levels would be below 45 dBA CNEL. The analysis and plan shall determine the specific design features and construction materials needed to sufficiently reduce interior noise levels. These may include:

- Sound-rated windows and skylights
- Reducing or eliminating the use of skylights
- Upgraded insulation
- Upgraded exterior wall and roof/attic construction
- Sound-rated doors
- Minimization of vents and other openings in the building envelope
- Ventilation upgrades to ensure windows can remain closed

Project dwellings shall be designed so that interior noise levels will meet the Title 24 interior noise standard of 45 dBA CNEL The plan shall be provided to and approved by the San Bruno Department of Community Development prior to the issuance of the first residential construction permit.

3.10.4 References Cited

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3.11 Population and Housing

3.11.1 Introduction

This section evaluates the potential impacts on population and housing that could result from construction and operation of the Tanforan Redevelopment Project (project). This section also describes existing conditions at the project site as well as the regulatory framework for this analysis. Impacts resulting from implementation of the project, and feasible mitigation measures, where applicable, are also described. Potential environmental impacts related to population and housing growth are also examined in other sections of this Draft EIR (e.g., Sections 3.1, *Air Quality*; 3.9, *Land Use*; 3.10, *Noise*; 3.12, *Public Services*; 3.14, *Transportation*; and 3.16, *Utilities and Service Systems*, and Chapter 5, *Other CEQA Considerations*).

No questions or concerns related to population and housing were raised in the Notice of Preparation (NOP) (Appendix 1-1, *Notice of Preparation and Comments Received on the Notice of Preparation*).

3.11.2 Existing Conditions

3.11.2.1 Regulatory Setting

This section summarizes regulations and policies that are relevant to the analysis of the project's potential impacts on population and housing.

State

Sustainable Communities Strategy and Senate Bill 375

Senate Bill (SB) 375, adopted in 2008, requires preparation of a Sustainable Communities Strategy (SCS) as part of the Regional Transportation Plan (RTP) for the Bay Area. In the Bay Area, the Metropolitan Transportation Commission (MTC) and Association of Bay Area Governments (ABAG) are jointly responsible for developing and adopting an SCS that integrates transportation, land use, and housing plans to meet the greenhouse gas reduction targets set by the California Air Resources Board. MTC and ABAG adopted *Plan Bay Area 2050* in 2021 (ABAG and MTC 2021).[1] *Plan Bay Area 2050* is the integrated land use/transportation plan and demographic/economic forecast for the nine-county San Francisco Bay Area region. The plan coordinates housing plans, open space conservation efforts, economic development strategies, and transportation investments. *Plan Bay Area 2050* includes transportation and environmental strategies that support active and shared modes of travel, combined with a transit-supportive land use pattern that places housing near transportation centers and employment centers.

Plan Bay Area 2050 also forecasts changes to the Bay Area population, including projected household and job growth, at the regional, county, and sub-county level. *Plan Bay Area 2050* includes ABAG's most recent projections of demographic, economic, and land use changes in the coming decades. According to *Plan Bay Area 2050*, the number of households in San Mateo County is

[1] ABAG and MTC are currently preparing Plan Bay Area 2050+, which will provide a focused update to Plan Bay Area 2050. It is anticipated that Plan Bay Area 2050+ will be adopted after completion of the project's CEQA review, and is therefore not applicable to the proposed project.

expected to increase by 129,000 between 2015 and 2050, and the number of jobs is expected to increase by 114,000 during the same period. Prior to *Plan Bay Area 2050, Plan Bay Area 2040*, adopted in 2017, was the most recent RTP and SCS for the Bay Area (ABAG and MTC 2018). *Plan Bay Area 2050*, which updates *Plan Bay Area 2040*, is consistent with the current Regional Housing Needs Allocation (RHNA) cycle.

In addition to providing household and job growth projections at the regional, county, and sub-county level, *Plan Bay Area 2040* provided projections at the city level. However, city-level growth projections are not yet available in *Plan Bay Area 2050* (ABAG and MTC 2021). Because *Plan Bay Area 2050* was adopted in late 2021, *Plan Bay Area 2040* will continue to serve as the basis for regional and county-wide transportation models until the models are updated. To be consistent with the transportation models, 2040 projections from *Plan Bay Area 2040* are used throughout this document. Since the project is anticipated to be built out and fully occupied by 2035, projections through 2035 are used.

The projections illustrate how the region will accommodate growth if local jurisdictions adopt a set of policies consistent with the vision of Plan Bay Area. Growth is distributed within the region among counties, cities, and Priority Development Area (PDAs), which are designated areas expected to accommodate more than two-thirds of all regional growth by 2040. PDAs are areas near existing job centers or frequent transit that are locally identified (i.e., by towns, cities, or counties) for housing and job growth (ABAG and MTC 2021). The project site is within a designated PDA, as shown in Chapter 2, *Project Description*, Figure 2-6 of this Draft EIR.

Housing Element Law

The Housing Element is one of seven state-mandated elements in a city's general plan. The required contents of a housing element are set forth in California Government Code Section 65583. Among other requirements, housing elements are required to adequately plan to meet their respective city's existing and projected housing needs, including their share of the "regional housing need." The law recognizes that, for the private sector to adequately address housing needs and demand, local governments must adopt land use plans and regulatory schemes that provide opportunities for, and do not unduly constrain, housing development.

This share of the region's projected housing needs is called Regional Housing Needs Allocation or RHNA. Housing needs for each region in the state are determined by the State Department of Housing and Community Development and submitted to Councils of Government for allocation to local jurisdictions. ABAG is ultimately responsible for determining the share of regional housing needs to be met by each city in the Bay Area. State housing law has established four housing affordability categories. The categories are based on the region's median income, taking into account households ranging in size from one to six people.

The following four affordability categories are used by ABAG in allocating regional housing needs.

- Very Low: 0 to 50 percent of the area's median income
- Low: 50 to 80 percent of the area's median income
- Moderate: 80 to 120 percent of the area's median income
- Above Moderate: greater than 120 percent of county median family income

In the Bay Area, the SCS and ABAG's RHNA methodology are mutually reinforcing and were developed together to meet the overlapping objectives of SB 375 and the Housing Element law. These objectives include increasing the supply, diversity, and affordability of housing; promoting infill development and a more efficient land use pattern; promoting an improved intraregional relationship between jobs and housing; protecting environmental resources; and promoting socioeconomic equity. SB 375 requires that the RHNA be consistent with the SCS and establishes an 8-year cycle for the RHNA.

The current RHNA identifies allocated housing units for the 2023 to 2031 period. As shown in Table 3.11-1, ABAG identified 3,165 units (defined by income category) as the City's fair share of the regional housing need for 2023 to 2031. San Mateo County's allocation is 47,687 housing units and the regional housing need is 441,176 housing units (ABAG 2021).

Table 3.11-1. 2023–2031 ABAG Regional Housing Need Allocation for the City of San Bruno, County of San Mateo, and Region (Units)

Income Level	City Need	County Need	Regional Need
Very Low	704	12,196	114,442
Low	405	7,023	65,892
Moderate	573	7,937	72,712
Subtotal of Affordable Units	*1,683*	*27,156*	*253,046*
Above Moderate [a]	1,483	20,531	188,130
Total	**3,165**	**47,687**	**441,176**

Source: ABAG 2021.

[a] Above Moderate = households with incomes greater than 120% of county median family income.

Regional and Local

City of San Bruno General Plan

A general plan is a state-required legal document that each planning agency in California prepares and the legislative body of each county and city adopts to provide a comprehensive, long-term plan for the physical development of the county or city. The current *San Bruno General Plan* (City of San Bruno 2009) and associated EIR were adopted by the City Council in 2009. As part of the *San Bruno General Plan*, the Housing Element, which is discussed in more detail below, was amended in 2024.

The general plan includes goals and policies related to housing, which are based on growth trends and population projections, as described previously. The Land Use and Urban Design Element contains policies aimed at providing adequate housing and maintaining a job-housing balance in San Bruno. The Housing Element includes a housing needs assessment that identifies current and projected housing needs as well as policies to accommodate housing development that will be affordable to a range of household types and income levels. The Housing Element contains goals, policies, and programs to guide future residential development as well as preserve and enhance existing residential areas in San Bruno. The *San Bruno General Plan* includes the following policies adopted to avoid or mitigate environmental impacts that are applicable to population and housing (City of San Bruno 2009).

- **Guiding Policy LUD-B:** Intensify land uses surrounding the new San Bruno BART station and planned San Bruno Caltrain station, including development of transit-oriented uses, regional shopping opportunities, high-intensity offices, hotels, and other similar uses.

- **Guiding Policy LUD-C:** Stimulate reuse and intensification with multi-use, transit-oriented development along El Camino Real, San Bruno Avenue, and San Mateo Avenue. Provide amenities serving pedestrians, bicyclists, and transit riders along these corridors.
- **Implementing Policy LUD-4:** Strengthen residential integrity in viable neighborhoods within the city's Redevelopment Area by eliminating incompatible uses and by facilitating upgrading of deteriorated structure.

The project's consistency with applicable *San Bruno General Plan* policies is evaluated in Section 3.9, *Land Use*, of this Draft EIR.

City of San Bruno Housing Element

On August 27, 2024, San Bruno adopted an amended 2023–2031 Housing Element and on October 21, 2024, the California Department of Housing and Community Development (HCD) found the element to be in substantial compliance with state law (City of San Bruno 2024a). The updated Housing Element for 2023–2031 is consistent with the other elements in the *San Bruno General Plan*, and is designed as an integral component for the implementation of *San Bruno General Plan* goals and policies. The residential capacity identified in the Housing Element is consistent with the general plan land use designations, the Transit Corridors Plan, Specific Plans, and zoning regulations.

As required by Government Code Section 65583(a)(3), the Housing Element Update involved the preparation of an inventory of land suitable and available for residential development, including vacant sites and sites with a realistic and demonstrated potential for redevelopment during the planning period to meet the City's housing need at the designated income levels. In total, the City identified 22 housing opportunity sites in the Housing Element Update that could be redeveloped with approximately 2,552 housing units. However, the net result of credits and site inventory for new housing units would be 394 more units than the minimum RHNA required for San Bruno (3,165 units). This would include sites with pending projects; the remaining sites that were included in the site inventory for the 2015 to 2023 RHNA cycle but not built within that timeframe; and the new housing opportunity sites (City of San Bruno 2024a).

The project site is included as housing opportunity Site 20[2] in the Housing Element and is the largest opportunity site identified. The Housing Element and the sites inventory assumed that a minimum of 1,002 housing units would be included at the project site. The Housing Element acknowledges that the property would need to be rezoned to permit housing and the general plan land use designation amended to allow for planned development at the project site, because at the time, residential uses were not permitted on the site. As discussed in Section 3.9, *Land Use*, following adoption of the Housing Element Update, the City rezoned a portion of the project site and the parcel north of Sneath Lane and updated the corresponding land use designations to allow for the development of 1,002 residential units, as envisioned in the Housing Element Update.[3]

[2] The project site was evaluated as Housing Opportunity Site 14 as part of the Housing Element IS/MND, and was subsequently renumbered to Housing Opportunity Site 20 as part of the adopted 2023-2031 Housing Element. This EIR uses Housing Opportunity Site 20 to identify the project site consistent with how the site is referenced in the adopted Housing Element.

[3] City of San Bruno. 2024. Ordinance No. 1954, An Ordinance of the City Council of the City of San Bruno Amending the Planned Development (P-D) District Created by Ordinance No. 1087 to Add Multi-Family Housing as a Permitted Use on the 11.28 Acre Site at 1178 El Camino Real, and to Amend the Boundaries of the P-D District Created by Ordinance No. 1087 to Include the 1.40 Acre Parcel at 1292 Huntington Avenue with Multi-Family Housing as a Permitted Use. Adopted: September 10, 2024.

City of San Bruno Affordable Housing Program

City of San Bruno Municipal Code Section 12.230 presents the City's Affordable Housing Program. The Affordable Housing Program includes requirements and regulations that apply to new residential ownership or rental developments of five units or more, and commercial linkage fees for nonresidential developments throughout the City. Public uses such as hospitals and community facilities and quasi-public uses such as childcare centers, community facilities, churches and schools are exempt from the fees (City of San Bruno 2025). Section 12.230.030 states that all new residential development projects of five or more units shall include at least 15 percent of the total units as affordable housing units restricted for occupancy by very low-, low-, and moderate-income households, as determined on a case-by-case basis.

3.11.2.2 Environmental Setting

This section describes population, employment, and housing data published in Projections 2040[4] by ABAG) and MTC[5] as well as other demographic information from the Demographic Research Unit of the California Department of Finance, the U.S. Census Bureau, and the City's Housing Element of the general plan. Projections 2040 is the most recent of ABAG's statistical compendia on demographic, economic, and land use changes in each local Bay Area jurisdiction through 2040. As such, the data from Projections 2040 are used in this analysis.

Population

As explained previously, ABAG's Projections 2040 was produced in support of the previous version of the SCS, rather than *Plan Bay Area 2050*, but was used for the analysis herein because it contains City-specific data. As shown in Table 3.11-2, according to ABAG's Projections 2040, San Bruno's population will increase by approximately 3,930, from 42,630 in 2025 to 46,560 in 2035, while San Mateo County's population will increase by approximately 60,335, from 805,875 in 2025 to 866,210 in 2035. The Bay Area population is also expected to grow, increasing by approximately 838,855.[6]

Housing

According to recent California Department of Finance data, San Bruno has approximately 16,766 total housing units and a 4.1 percent vacancy rate (as of January 1, 2024). Approximately 56 percent (9,379) of the units are single family detached units, approximately 4 percent (682) are single family attached homes, approximately 6 percent (939) are multi-family structures with two to four units, and approximately 34 percent (5,766) are multi-family structures with five or more units. The City has an average household size of 2.60 persons per household, similar to the 2.66 persons per household average for the county (California Department of Finance 2024). ABAG's Projections 2040 for housing are provided in Table 3.11-2 (ABAG and MTC 2018). There are currently no existing housing units on the project site.

[4] Although regional, county, and sub-county growth patterns and projections for households and jobs are available for Plan Bay Area 2050, city-level growth projections are not yet available. Therefore, to be consistent with the transportation models, 2040 projections from Plan Bay Area 2040 are used throughout this analysis.

[5] MTC is the government agency responsible for regional transportation planning and financing as well as coordinating transportation services in the nine-county San Francisco Bay Area.

[6] As discussed in the Sustainable Communities Strategy and Senate Bill 375 section above, ABAG's Projections 2040 is a series of statistical compendia on demographic, economic, and land use changes in the coming decades. These forecasts are created to help local governments anticipate and prepare for changes and are not based on actual counts. For these reasons, differences may appear between the population numbers in the ABAG forecasts and other data sets (for example, California Department of Finance or U.S. Census Bureau).

Table 3.11-2. City of San Bruno and Bay Area Population and Household Projections, 2025–2035

	2025	2030	2035	Growth, 2025–2035
Household Population [a]				
City of San Bruno	42,630	43,835	46,560	3,930 (9.2%)
San Mateo County	805,875	842,060	866,210	60,335 (7.5%)
Bay Area	8,113,640	8,509,245	8,952,495	838,855 (10.3%)
Households				
City of San Bruno	15,240	15,570	16,505	1,265 (8.3%)
San Mateo County	290,330	302,520	308,410	18,080 (6.2%)
Bay Area	3,009,055	3,142,020	3,281,130	272,075 (9.0%)

Source: MTC and ABAG 2018.

[a] Does not include the population in group quarters. The U.S. Census Bureau classifies all people not living in housing units (i.e., houses, apartments, mobile homes, rented rooms) as living in group quarters. Institutional group quarters include correctional facilities, nursing homes, and mental hospitals. Noninstitutional group quarters include college dormitories, military barracks, group homes, missions, and shelters.

Home prices reflect a complex mix of supply and demand factors, including an area's demographic profile, labor market, prevailing wages and job outlook, coupled with land and construction costs. The typical home value in San Bruno was estimated at $1,203,420 in December of 2020, per data from Zillow. Home values in San Bruno and the region have increased significantly since 2000. Similar to home values, rents have also increased across the Bay Area in the last decade. Higher rents and home prices have resulted in employees in the region commuting long distances to their jobs and schools or moving out of the region. Since 2009, the median rent has increased by 66 percent in San Bruno, from $1,580 to $2,240 per month. In San Mateo County, the median rent has increased 41 percent, from $1,560 to $2,200 (City of San Bruno n.d.).

Employment

Jobs located in the City of San Bruno are primarily jobs in professional and managerial services industry (28 percent); arts and recreation (18 percent); and health and educational services (16 percent), together representing more than 60 percent of all jobs in San Bruno. The remaining jobs are in retail, information services, manufacturing and wholesale, transportation and utilities, financial and leasing, government, and construction (City of San Bruno n.d.). As of 2022, approximately 13,628 employees work in San Bruno (U.S. Census Bureau 2022a). As shown in Table 3.11-3, jobs in San Bruno are projected to decrease by 150 jobs from 14,685 jobs to 14,535 jobs by 2035. In comparison, the total number of jobs in San Mateo County is projected to increase by 20,900 jobs from 2025 to 2035 (ABAG and MTC 2018).

Table 3.11-3. City of San Bruno and Bay Area Employment Projections, 2025–2035

	2025	2030	2035
San Bruno			
Population	42,630	43,835	46,560
Jobs	14,685	14,905	14,535
Employed Residents	22,425	22,640	23,560
Jobs-to-Employed-Residents Ratio	0.65	0.66	0.62

	2025	2030	2035
San Mateo County			
Population	805,875	842,060	866,210
Jobs	415,305	423,005	436,205
Employed Residents	420,235	433,655	437,190
Jobs-to-Employed-Residents Ratio	0.99	0.98	1.0
Bay Area			
Population	8,113,640	8,509,245	8,952,495
Jobs	4,267,760	4,405,120	4,548,565
Employed Residents	4,270,595	4,397,865	4,528,925
Jobs-to-Employed-Residents Ratio	1.0	1.0	1.0

Source: ABAG and MTC 2018.

While jobs in a jurisdiction, like San Bruno, are counted by place of work, the employees may either live in the same jurisdiction, or may commute to from other jurisdictions. Employed residents in a jurisdiction are counted by place of residence, but they may either work in the jurisdiction in which they live, or work elsewhere (City of San Bruno n.d.). As shown in Table 3.11-3, employed residents in San Bruno are expected to increase from 22,425 to 23,560 from 2025 to 2035. These employed residents could either work in San Bruno or commute to other jurisdictions for jobs. Employed residents in San Mateo County are expected to increase from 420,235 to 437,190 over the same period (ABAG and MTC 2018).

A city with a surplus of employed residents (workers) exports workers to other parts of the region, while a city that has a surplus of jobs must conversely import workers to its job sites. As shown in Table 3.11-3, the ratio of jobs to employed workers in San Bruno is currently 0.65; therefore, San Bruno is a net exporter of workers. Due to its size and development patterns, San Bruno has fewer jobs within the City limits; therefore, residents will commute to other areas for employment. Surpluses of workers in a wage group relative to jobs means the community will export those workers to other jurisdictions. This dynamic can contribute to long commutes and traffic congestion (City of San Bruno n.d.). ABAG predicts that the ratio for San Bruno will be reduced from 0.65 to 0.61 from 2025 to 2035, which means that San Bruno will export more workers than provide jobs. San Mateo County and the region will generally maintain a jobs-to-employed-residents ratio of approximately 1.0 over the same period. Therefore, San Mateo County and the region as a whole will continue to provide equally as many jobs as there are residents (ABAG and MTC 2018).

Approximately 61 percent of San Bruno employed residents earn less than $75,000 annually, which is less than the area median income in San Mateo County. Similarly, 63 percent of the jobs located at San Bruno job sites pay less than $75,000, annually. Regardless of whether a person works in San Bruno or lives in San Bruno and commutes for work, approximately 60 percent of workers cannot cover the cost of living for a family of four (two adults and two children will need to earn $150,620 a year, in 2021, to live and sustain themselves in San Mateo County). When there is high demand for housing relative to supply, many workers may be unable to afford to live where they work. In San Bruno, these ratios indicate there is demand for housing options at prices that are affordable to households where individual employed workers make less than $75,000, annually (City of San Bruno n.d.).

Over the past 30 years, new home construction has not kept up with job growth, leading to a housing shortage in the region. The jobs–household ratio compares the number of jobs in an area to the number of occupied housing units in an area. The ratio is an indication of how the number of jobs (surplus or deficit) impacts housing availability. From 2004 to 2016, the jobs–household ratio in San Bruno was below 1.0 workers per worker household, indicating fewer jobs as a proportion of housing units and that housing units were available for the number of workers in the area. Beginning in 2016, the jobs–household ratio in San Bruno surpassed 1.0 worker per worker household indicating a surplus of jobs for the number of housing units, and that adequate housing may be more unaffordable or unavailable to workers in that area. In the Bay Area and San Mateo County jobs–household ratios consistently above 1.2 since 2005 and increasing upward of 1.5 in recent years. This indicates that regionally, there has been a steady surplus of jobs for the number of occupied housing units for decades, and that adequate housing may be more unaffordable or unavailable to workers. These ratios indicating more jobs than housing leads to longer commutes for employees living outside of the City and an increase in housing prices and rental rates (City of San Bruno n.d.).

Currently, the workers per worker household ratio in San Bruno is 1.58 (U.S. Census Bureau 2022b). In comparison, the workers per worker household ratio in San Mateo County is 1.46 (U.S. Census Bureau 2022b). Due to flexible office work policies put in place during the COVID-19 pandemic, there has been an increase in telecommuting. As of 2022, approximately 19.5 percent of the people who currently work in San Bruno also live in San Bruno, not including people who work from home (U.S. Census Bureau, 2022a, c, d).[7]

3.11.3 Environmental Impact Analysis

This section describes the environmental impacts of the project on population and housing. It describes the thresholds used to determine whether an impact would be significant and methods used to evaluate the impacts. Measures to mitigate significant impacts are provided, where appropriate.

3.11.3.1 Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, the project would have the potential to have a significant effect on population and housing if it would result in any of the following conditions.

a. 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)?

b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

[7] 6,062 employees who both live and work in San Bruno – 3,406 employees who work from home = 2,656 San Bruno residents who both live and work in the City. 2,656 San Bruno residents who both live and work in the City / 13,628 employees in San Bruno (excluding those who work from home) = 19.5 percent of San Bruno residents who also work in the City. Numbers provided here may not add up exactly because of rounding. For ease of reference, decimal places are not shown. The totals described in the text are correct, when accounting for rounding.

3.11.3.2 Methodology and Approach

This analysis considers whether substantial population and household growth would occur with implementation of the project and whether this growth is within forecasts for the City or can be considered substantial with respect to remaining growth potential in the City. This section uses ABAG's projections to analyze the project's impacts, the use of *Plan Bay Area 2050* data to inform the RHNA, and the City's Housing Element.

Substantial population growth is considered an increase in population that is unplanned, without consideration of, or planning for, infrastructure services and housing to support new residents, employees, and visitors. In general, a project that induces population growth is not viewed as having a significant impact on the environment unless the physical changes that would be needed to accommodate project-related population growth would have adverse impacts on the environment. Project-related residential growth would result in direct physical environmental changes. Impacts of residential growth are analyzed and disclosed in the various environmental topic sections in this EIR.

An indirect environmental impact is a change to the physical environment that is not immediately related to a proposed project. Specifically, indirect project-related population growth includes the ways in which a proposed project could foster economic or population growth in other locations or induce the construction of additional housing. Projects that would remove obstacles to population growth (e.g., a major expansion of a wastewater treatment plant or an extension of roadways into a previously unserved area) might, for example, allow for development to occur in an area that was not previously considered feasible for development because of infrastructure limitations. This type of development pattern typically occurs in suburban or rural areas adjacent to undeveloped land and is not generally applicable to a site that is in a developed urban environment and already served by infrastructure.

3.11.3.3 Buildout Scenario Evaluated

As discussed in Section 3.0.3.1, *Buildout Scenarios*, for each resource area studied, the EIR evaluates the buildout scenario with the greatest potential to result in a significant impact. In some cases, impacts would be the same regardless of the buildout scenario, so the analysis does not evaluate a specific buildout scenario. This approach ensures that the EIR identifies the maximum potential impacts of the project based on reasonable foreseeable development outcomes. Tables 3.11-4 and 3.11-5 show the employees and San Bruno residents that would result under Scenario A and Scenario B, respectively. For full calculations, please refer to the analysis in Section 3.11.3.4, *Impacts and Mitigation Measures*.

Table 3.11-4. Scenario A (R&D Scenario) – Estimated Employment and Housing

	Employees	Residents
Employees		
Existing Employees [a, b]	2,244	--
Project Employees [b]	4,722	--
Net New Employees	2,478	--
San Bruno Residents		
Onsite Residents [c]	--	2,028
Residents Induced by Onsite Employment [c]	--	662
Total Residents in San Bruno		
Total (Net New)	**2,478**	**2,690**

TBD = to be determined, sf = square feet; DU = domestic units

[a] Existing employees excludes the existing Target, movie theater, and Hyundai dealership.

[b] Economic & Planning Systems, Employment Density Assumptions for Tanforan Mall Redevelopment, 2025.

[c] See Impact POP-1 for calculations.

Table 3.11-5. Scenario B (Residential Scenario) – Estimated Employment and Housing

	Employees	Residents
Employees		
Existing Employees [a, b]	2,244	--
Project Employees [b]	3,819	--
Net New Employees	1,574	--
San Bruno Residents		
Onsite Residents [c]	--	3,028
San Bruno Residents Induced by Onsite Employment [c]	--	420
Total Residents in San Bruno		
Total (Net New) --	**1,574**	**3,448**

TBD = to be determined, sf = square feet; DU = domestic units

[a] Existing employees excludes the existing Target, movie theater, and Hyundai dealership.

[b] Economic & Planning Systems, Employment Density Assumptions for Tanforan Mall Redevelopment, 2025..

[c] See Impact POP-1 for calculations.

As shown Table 3.11-4, Scenario A would result in 2,478 net new employees and 2,028 residents living in the 1,014 units at the project site. Including new employees who would also live in San Bruno, the project would induce a total of 2,690 new residents in San Bruno. As shown Table 3.11-5, Scenario B would result in 1,574 net new employees and 3,028 residents living in the 1,514 units at the project site. Including new employees who would also live in San Bruno, the project would induce a total of 3,448 new residents in San Bruno. However, due to the induced population from onsite employment, the project would result in more regional population and a demand for housing. Therefore, impacts would vary, depending on the scenario. Table 3.11-6 summarizes the conservative approach for each topic covered in this analysis. The numbers provided in the table are described and analyzed in more detail following the table. In general, when analyzing impacts from the onsite units, onsite residents, and population in San Bruno, Scenario B will be used to determine impact levels. However, when analyzing the regional population growth and regional housing supply and demand, Scenario A will be used to determine impact levels.

Table 3.11-6. Impact Analysis Approach for Population and Housing

Impact Criteria	Scenario A	Scenario B	EIR Approach
Total Net New Employees	2,478 employees	1,574 employees	**Scenario A –** Scenario A would have more employees, and is the scenario assumed for this factor.
Total Onsite Units	1,014 units	1,514 units	**Scenario B –** Scenario B includes more onsite units, and is the scenario assumed for this factor.
Total Onsite Residents	2,028 residents	3,028 residents	**Scenario B –** Scenario B would induce more onsite residents, and is the scenario assumed for this factor.
San Bruno: Residents (onsite housing residents + induced employees who would live/work in San Bruno)	2,690 residents	3,448 residents	**Scenario B –** There would be more residents in San Bruno as a result of Scenario B.
Regional: Residents (including onsite residents + residents induced by project employment)	6,324 residents	5,757 residents	**Scenario A –** There would be more residents regionally as a result of Scenario A.
Regional: Housing Supply/Demand (proposed onsite housing - total demand for housing units for project employees)	1,014 onsite units - 1,697 induced employee households regionally = -683 (a *deficit* of 683 housing units in the region)	1,514 onsite units - 1,078 induced employee households regionally = 436 housing demand (*surplus* of 436 units in the region)	**Scenario A –** Because there would be more employees and less housing under Scenario A, there would be a regional deficit of housing available, resulting in potentially the need for construction of housing elsewhere.

3.11.3.4 Impacts and Mitigation Measures

Impact POP-1: Implementation of the project would not induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads of other infrastructure) (Less than Significant).

Construction

Construction of the project, including the site preparation and building demolition phases, would temporarily increase construction employment in the City. The number of construction workers per day would vary, depending on the construction phase, with an average of approximately 80 workers onsite. Although construction would occur over an extended period of time, the demand for construction employment would likely be met within the existing and future labor market in the City and the county. The size of the construction workforce would vary during the different stages of construction, but a substantial number of workers from outside the City or county would not be expected to relocate permanently. Therefore, the population within the City or county as a result of workers relocating is not anticipated to increase substantially during project construction, resulting in a ***less-than-significant*** impact.

Operation

The project under both scenarios would have impacts on the supply and demand for housing in San Bruno and in the region. New residential units developed at the project site would increase the supply of housing; whereas the project's nonresidential components would increase employment as compared to existing employment conditions. New employees at the project site, therefore, would result in new demand for additional housing within commuting distance for workers. The following analysis describes employment growth as a result of the project, as well as indirect population growth from employment and direct population growth from the proposed onsite units. The analysis also describes the housing demand and growth resulting from direct and indirect population increases under the project. As stated previously, the more conservative scenario will be analyzed, depending on the topic.

Employment Growth

Scenario A would generate the most employment; therefore, impacts related to employment growth are analyzed under Scenario A. Operation of the project would generate up to 2,478 net new jobs onsite, accounting for the 2,244 existing employees who would no longer work at the project site with implementation of the project.[8] As shown in Table 3.11-3, ABAG estimates the number of jobs in the City will decrease by approximately 150 jobs between 2025 and 2035. Therefore, the number of employees generated by the project in San Bruno would significantly exceed the employment growth forecasts. However, as explained in more detail below, the project-induced employees would not result in a significant increase in City population or a demand for housing that would exceed ABAG projections, which is what drives environmental impacts under CEQA. Therefore, the exceedance of ABAG employment projections would not result in significant adverse environmental impacts.

Indirect Population Growth from Project Employment

Operation of Scenario A would generate up to 2,478 net new jobs at the project site. Using an average of 1.46 workers per housing unit,[9] the project would generate approximately 1,697 new households regionally.[10] The current estimate of "commute share" uses data on existing commute patterns to estimate the number of workers who would live in San Bruno; it is currently estimated that 19.5 percent of San Bruno's workforce also lives in San Bruno. Therefore, assuming that 19.5 percent of workers who work at the project site would also live in San Bruno,[11] approximately 331

[8] For comparison purposes, Scenario B would generate approximately 1,574 jobs at the project site.

[9] ICF derived the worker-per-worker household figure from ACS data for 2018 to 2022 (most recent data available). The ACS data provide estimates of the total number of workers in San Mateo County (386,517) and the total number of households with at least one working household member (265,124). The ratio of the two figures for San Mateo County is 1.46 workers per worker household. The San Mateo County figure is used in the analysis because worker averages will be more similar to those of the county as a whole rather than those from the smaller city of San Bruno profile, which has an average of 1.58 workers per worker household.

[10] 2,478 new jobs/1.46 workers per housing unit = 1,697 total households (rounded).

[11] It is possible that, because housing units would be constructed at the project site, more than 19.5 percent of project-induced employees would live within the city. The construction of housing in close proximity to jobs could encourage more project-induced employees to live within the city. However, it is unknown at this time how many employees would choose to live at the project site. Therefore, the current percent of workers who live and work in the city (19.5 percent) is used for this analysis.

new households would be generated in the City.[12] With an average 2.60 persons per household (pph), the project's onsite employment could generate approximately 662 residents in San Bruno.[13,14]

As shown in Table 3.11-2, approximately 42,630 residents lived within the City in 2025. According to ABAG projections, the population is projected to increase to approximately 46,560 by 2035. This represents 3,930 additional residents over 10 years. The addition of up to 662 new residents in the City as a result of the project's onsite employment would represent approximately 16.8 percent of the anticipated population growth in the City between 2025 and 2035.[15]

Direct Population Growth from Onsite Residences

Scenario B would include the maximum amount of onsite residential units (1,574 units); therefore, Scenario B will be analyzed for the impacts related to the direct population growth from onsite residences. Approximately 12 percent of the dwelling units (200 dwelling units) would be Below-Market-Rate housing.

As shown in Table 3.11-7, the residential uses at the project site would provide primarily one-bedroom units with a mix of studio and two-bedroom units. Because of the proposed unit sizes, estimates for the onsite population reflect a lower average household size than the City average of 2.60 pph. Across all units, it is expected that the average household size would be approximately 2.0 pph. This would result in a total onsite population of approximately 3,028.[16] Table 3.11-7 summarizes the onsite population by unit size.

Table 3.11-7. Onsite Population by Unit Size (Scenario B)

	Number of Units	Estimated Household Size	Total Number of People
Studio	379	1	379
1 Bedroom Unit	756	2	1,512
2+ Bedroom Unit	379	3	1,137
Total	**1,514**	**2.0**	**3,028**

Source: California Health and Safety Code Section 50052.5(h).

[12] 1,697 regional households × 19.5 percent of people who work and live in San Bruno = 331 new households in San Bruno.

[13] 331 new households × 2.60 pph = 662 residents in San Bruno (rounded).

[14] For comparison purposes, using the same calculations as above, Scenario B would generate a housing demand of approximately 210 units and an indirect population increase in San Bruno of 420 new residents.

[15] Up to 662 new residents in the city/3,930 anticipated new residents in the city between 2025 and 2035 = 16.8 percent of anticipated population growth in the city.

[16] For comparison purposes, using the same calculations as above, the 1,014 units under Scenario A would result in an onsite population of approximately 2,028 residents.

Based on ABAG projections, the residential population in San Bruno is expected to increase by 3,930 over the next 10 years. The addition of up to 3,028 new onsite residents in the City as a result of the project would represent approximately 77 percent of the anticipated population growth in the City between 2025 and 2035.[17]

Total San Bruno Population Growth

As discussed previously, the onsite employment induced by the project would result in approximately 662 new San Bruno residents under Scenario A and approximately 420 residents under Scenario B. Housing units generated by the project on the project site are anticipated to increase the resident population of San Bruno by approximately 2,028 residents under Scenario A and approximately 3,028 residents under Scenario B. Although the project would generate more employee-induced San Bruno residents under Scenario A, when added to the onsite population, Scenario B would result in the greatest amount of population growth in San Bruno. Therefore, Scenario B is the conservative scenario for population growth in the City. Assuming the worst-case scenario that none of the project employees would live onsite, which is unlikely, the project would result in approximately 3,448 new residents in San Bruno. Based on ABAG projections, the residential population in San Bruno is expected to increase by 3,930 over the next 10 years. The addition of up to 3,448 new residents in the City as a result of the project (employment and onsite residents) would represent approximately 88 percent of the anticipated population growth in the City between 2025 and 2035.[18] While this project is not specifically accounted for in the ABAG projections, it can be accommodated within the projected growth. In addition, this level of growth is consistent with the project site's designation as the largest housing opportunity site identified in the Housing Element and, therefore, considered as part of the growth accounted for in regional planning efforts.

Total Regional Housing Demand and Growth

As discussed above, Scenario B would result in a larger population increase in San Bruno than Scenario A. However, the new employees at the project site would result in a larger regional population increase and, as a result, a demand for housing in the region. Therefore, Scenario A would result in greater impacts on the region as a whole. In addition, Scenario A would not include as much onsite housing to potentially offset the impacts related to housing demands. In fact, Scenario B would result in a net increase of housing in the region due to the proposed onsite residential units. Therefore, for conservative purposes, the analysis on regional housing demand and growth focuses on Scenario A.

As discussed previously, the project would induce a demand for 1,697 housing units in the region as a result of onsite employment. Although the project would add 1,014 new residential units to the housing supply, because of the regional housing demand from the project's onsite employment, there would be a 683-unit deficit in housing supplied by the project in San Bruno compared to the demand created by the project in the region.[19] Therefore, the project is estimated to result in a net decrease in available housing in the region (i.e., approximately 683 units).

[17] Up to 3,028 new residents in the city/3,930 anticipated new residents in the city between 2025 and 2035 = 77 percent of anticipated population growth in the city.

[18] Up to 3,448 new residents in the city/3,930 anticipated new residents in the city between 2025 and 2035 = 88 percent of anticipated population growth in the city.

[19] Project demand for 1,697 units minus the project's provision of 1,014 units = 683-unit deficit.

However, the approximately 683-unit deficit across the region as a result of the project, as induced by onsite employment, could be accommodated within other allowable construction in the City and housing in the rest of the region. Within the City alone, the Housing Element (2023–2031) Initial Study/Mitigated Negative Declaration (IS/MND) and Addendum evaluates the development of up to 2,552 new residential units within the 8-year planning period (City of San Bruno 2024b). These housing units would be constructed at various sites throughout the City; therefore, it is anticipated that some of the housing demand as a result of the project could be accommodated within the projected housing studied in the Housing Element.

According to ABAG projections, the number of households in the Bay Area is expected to grow by 272,075 between 2025 and 2035. Therefore, the 683-unit demand deficit represents only a small fraction of the anticipated housing growth in the region between 2025 and 2035. Furthermore, it is reasonable to assume that only 19.5 percent of the employees who would be induced by the project would live in the City; therefore, the rest would seek housing elsewhere in the Bay Area.

In San Bruno, onsite induced employment would generate a demand for 331 housing units in the City. However, the net increase in housing availability in San Bruno as a result of the project would amount to 1,014 units. Therefore, proposed housing at the project site would partially offset the housing demand from onsite employees who would both live and work in San Bruno. In addition, the project was considered as part of the growth accounted for in regional planning efforts, including the San Bruno Housing Element. Therefore, the project's induced housing demand in the City, county, and region was also accounted for. The remaining employees who would not live in San Bruno would likely find housing throughout the region, with the majority living in San Mateo, Santa Clara, Alameda, and San Francisco Counties.

ABAG projections are considered the benchmark for foreseeable housing growth (i.e., built housing) in each area. As shown in Table 3.11-2, ABAG projects that the number of households will grow by 9.0 percent in the Bay Area, 7.5 percent in San Mateo County, and 8.3 percent in the City between 2025 and 2035. For that same period, the indirect housing demand generated by the project would be 0.62 percent of the projected household growth in the Bay Area and 9.4 percent of that in San Mateo County. On a regional basis, the project's demand for housing would not represent a significant share of the total housing growth projected by ABAG.

Conclusion

The project site is included as housing opportunity Site 20 in the Housing Element. The Housing Element assumed that a minimum of 1,002 housing units would be included at the project site (City of San Bruno 2024a). As such, much of the development proposed under the project is accounted for under City and regional projections. The project would construct more housing (1,014 units under Scenario A and 1,514 units under Scenario B) than originally analyzed under the Housing Element. However, even with the addition of approximately 500 units under Scenario B, the project would still be within ABAG forecasts, as discussed above. In addition, the project site is an infill site where additional infrastructure needs can be accommodated, as discussed in Section 3.14, *Transportation*, and Section 3.16, *Utilities*. Therefore, the project would be consistent with the intensity of residential development, job development, and associated population increases considered by the *San Bruno General Plan* and Housing Element and would not result in residential or employment growth beyond that already analyzed in previous EIRs.

The project is an infill development within an already-developed area of the City. As discussed above, the project would focus growth within a PDA, which is consistent with the key objectives of Plan Bay Area 2025. In addition, employment growth under the project is accounted for in the City's Housing Element and regional growth plans. The project would increase the supply of housing in San Bruno by providing new housing. However, nonresidential project components would increase employment and likely result in the demand for additional housing within commuting distance for workers. The housing demand in the City as a result of the project can be accommodated in the City, and the anticipated housing demand in the Bay Area region has been anticipated in regional growth plans. The project site is an urban infill site and served by existing infrastructure and services. The project would not induce a substantial level of unplanned population growth, either directly or indirectly, resulting in ***less-than-significant*** impacts. No mitigation is required.

Impact POP-2: The project would not displace substantial numbers of people or housing, necessitating the construction of replacement housing elsewhere (Less than Significant).

The project would not directly displace housing because there is no existing housing on the project site. Therefore, the project would not directly displace people or housing by demolishing housing units. The displacement of housing units or residents is an appropriate subject for study under CEQA to the extent that a project would displace housing onsite and result in a need to construct replacement housing elsewhere, which would cause physical changes to the environment. By itself, the possibility of a project resulting in economic displacement of existing residents represents a social and economic issue that would not be considered an impact on the physical environment, unless there is substantial evidence that economic displacement would result in reasonably foreseeable (i.e., not speculative) indirect physical effects that would require the construction of new housing. For the project, determining how economic effects influence future housing development in particular locations throughout a region is too speculative to predict or evaluate. Therefore, for purposes of CEQA, the project would not result in the displacement of substantial numbers of people or housing, necessitating the construction of replacement housing elsewhere, resulting in a ***less-than-significant*** impact. No mitigation is required.

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3.12 Public Services

3.12.1 Introduction

This section evaluates the potential impacts on public services that could result from construction and operation of the Tanforan Redevelopment Project (project). This section also describes existing conditions at the project site as well as the regulatory framework for this analysis. Impacts resulting from implementation of the project, and feasible mitigation measures, where applicable, are also described.

No questions or concerns related to public services were raised in the Notice of Preparation (NOP) (Appendix 1-1, *Notice of Preparation and Comments Received on the Notice of Preparation*).

3.12.2 Existing Conditions

3.12.2.1 Regulatory Setting

Fire Protection Services

Federal

This section summarizes regulations and policies that are relevant to the analysis of the project's potential impacts on public services.

Uniform Fire Code

The National Fire Protection Association (NFPA) publishes the Uniform Fire Code, which provides standards for fire protection. The nationally recognized standards require that fire departments "have the capability to deploy an initial full alarm assignment within an eight-minute response time to 90 percent of the incidents."

State

California Fire Code

The California Fire Code incorporates, by adoption, the International Fire Code of the International Code Council, with California amendments. This is the official fire code for the state and all political subdivisions. It is located in Part 9 of Title 24 of the California Code of Regulations. The California Fire Code is revised and published every 3 years by the California Building Standards Commission; the currently operable code is the 2022 California Fire Code, which has been adopted by the City of San Bruno.

Regional and Local

San Bruno General Plan

The *San Bruno General Plan* (City of San Bruno 2009) outlines various goals, policies, and implementing programs relevant to fire protection services in the Public Facilities and Services Element. Policies relevant to the project address the adequate provision of public safety staffing, facilities, and building features such as fire flow and sprinklers. The project's consistency with applicable general plan policies is evaluated in Section 3.9, *Land Use and Planning*.

The *San Bruno General Plan* includes the following policies that were adopted to avoid or mitigate environmental impacts on public services and are applicable to the project (City of San Bruno 2009).

- **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-F:** Provide adequate public safety services for all San Bruno properties—including police protection, fire suppression, emergency medical care, and emergency management.
- **PFS-3:** Require, as part of plan review, identification of needed public service improvement and maintenance costs for those projects that may have a significant impact on existing services.
- **PFS-26:** Ensure adequate staffing and facilities for the City's Police and Fire departments to achieve desired levels of service, particularly surrounding transit areas and along urban interface hazard areas.
- **PFS-31:** Ensure adequate fire water pressure as a condition of approval for all new development projects.
- **PFS-34:** Identify and remove mature and/or diseased Eucalyptus trees in rights-of-way and other open areas, if they pose a fire hazard or other threat to health and safety.
- **PFS-35:** Require installation of automatic sprinkler systems in all hotel, motel, and other overnight lodging facilities, in mixed commercial/residential uses, and in apartment buildings of three or more units.

Police Protection Services

Regional and Local

San Bruno General Plan

The *San Bruno General Plan* (City of San Bruno 2009) outlines various goals, policies, and implementing programs relevant to police protection services in the Public Facilities and Services Element. Policies relevant to the project address the adequate provision of public safety staffing, facilities, and building features such as adequate staffing and facilities. The project's consistency with applicable general plan policies is evaluated in Section 3.9, *Land Use and Planning*, of this Draft EIR.

The *San Bruno General Plan* includes the following policies that were adopted to avoid or mitigate environmental impacts on public services and are applicable to the project (City of San Bruno 2009).

- **PFS-F:** Provide adequate public safety services for all San Bruno properties—including police.
- **PFS-26:** Ensure adequate staffing and facilities for the City's Police and Fire departments to achieve desired levels of service, particularly surrounding transit areas and along urban-interface hazard areas.

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Figure 3.12-1
Public Services

- **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.

Schools

State

Senate Bill 50

Senate Bill (SB) 50 (funded by bonds sold under Proposition 1A, approved in 1998) limits the power of cities and counties to require mitigation of school facilities impacts as a condition of approving new development and provides instead for a standardized developer fee. SB 50 generally provides for a 50/50 state and local school facilities funding match. SB 50 also provides for three levels of statutory impact fees. The application level depends on whether state funding is available, whether the school district is eligible for state funding, and whether the school district meets certain additional criteria involving bonding capacity, year-round school, and the percentage of moveable classrooms in use.

California Government Code Section 65995(b) and Education Code Section 17620

SB 50 amended the California Government Code Section 65995, which contains limitations on Education Code Section 17620, the statute that authorizes school districts to assess development fees within school district boundaries. Government Code Section 65995(b)(3) requires the maximum square footage assessment for development to be increased every 2 years, according to inflation adjustments. On January 24, 2024, the State Allocation Board approved increasing the allowable amount of statutory school facilities fees (Level I School Fees) to $5.17 per square foot of assessable space for residential development of 500 square feet or more, and to $0.84 per square foot of chargeable covered and enclosed space for commercial/industrial development (State Allocation Board 2025).

Mitigation Fee Act (California Government Code 66000–66008)

Enacted as Assembly Bill (AB) 1600, the Mitigation Fee Act requires a local agency establishing, increasing, or imposing an impact fee as a condition of development to identify the purpose of the fee and the use to which the fee is to be put. The agency must also demonstrate a reasonable relationship between the fee and the purpose for which it is charged, and between the fee and the type of development plan on which it is to be levied. The act came into force on January 1, 1989.

Regional and Local

San Bruno General Plan

The *San Bruno General Plan* (City of San Bruno 2009) outlines various goals, policies, and implementing programs relevant to schools. The *San Bruno General Plan* includes the following policies that were adopted to avoid or mitigate environmental impacts on public services and are applicable to the project (City of San Bruno 2009).

- **OSR-5:** Strive to locate neighborhood park facilities within 1/3-mile walking distance of all residences in San Bruno. If limited in some neighborhoods, coordinate with local school districts to allow use of playgrounds and sports facilities after school hours.

- **OSR-10:** Continue coordination with San Bruno Park School District (per the Five-Year Joint Use Agreement, 2002) to allow joint use of school facilities for after-school programs, sports leagues, and non-organized play.
- **PFS-51:** Work cooperatively with local school districts to monitor the growth of the school-age population within San Bruno, and the subsequent need for school sites and facilities.

The project's consistency with applicable general plan policies is evaluated in Section 3.9, *Land Use and Planning*, of this Draft EIR.

Library Services

Regional and Local

San Bruno General Plan

The *San Bruno General Plan* outlines goals, policies, and implementing programs relevant to libraries. The policies relevant to the project address the provision of a wide range of library services to San Bruno residents. The project's consistency with applicable general plan policies is evaluated in Section 3.9, *Land Use*, of this Draft EIR.

The *San Bruno General Plan* includes the following policies that were adopted to avoid or mitigate environmental impacts on public services and are applicable to the project (City of San Bruno 2009).

- **PFS-55:** Provide a wide range of library services to San Bruno residents through a strong main Public Library facility.
- **PFS-59:** In order to prevent anticipated future population growth in San Bruno from burdening existing over-extended library services, City staff will ensure upon individual project review that the developer sets aside contributions or in-lieu fees in general proportion to the burden proposed new residential development would have on the library system, and that those fees are used to improve public library facilities. The per capita share will be negotiated between the Ad Hoc Library Citizen's Committee,[1] City Staff, and City Council, within 1 year of Plan adoption, and will be applied uniformly (and if necessary, retroactively) across all residential development occupancy permit applications submitted after Plan adoption, until such time as an alternative form of support is provided, or the library facilities are fully upgraded to the requirements as described on pages 8-12.

Parks and Recreation

The regulatory setting related to parks and recreation are included in Section 3.13, *Recreation*.

3.12.2.2 Environmental Setting

Fire Protection Services

The San Bruno Fire Department (SBFD) provides fire suppression and emergency medical service in the City, including the project site.

Staffing

Fire protection in the City of San Bruno is provided by SBFD, which has 32 full-time firefighters and five administrative and support staff employees operating out of two fire stations. Fire department

[1] Note that the Ad Hoc Library Citizen's Committee no longer exists. However, another ad hoc committee could be created for this function.

administration consists of a fire chief, a fire marshal, and three shift battalion chiefs. All fire department firefighters are trained at either the Advanced Life Support or Emergency Medical Technician level. Although SBFD does not have an established standard for staffing percentages, the fire department currently maintains a 0.72 per 1,000 population ratio. This ratio is well below the national median of 1.28 per 1,000 population and a West Coast regional median of 1.00 per 1,000 population (Delay pers. comm.).

Facilities

The fire department operates two fire stations in the City of San Bruno. Station No. 51 is on the south side of the City Hall complex at 555 El Camino Real, approximately 0.7 mile south of the project site, and generally covers the area east of Interstate (I-)280. Station No. 52 is near the intersection of Sneath Lane and Earl Avenue at 1999 Earl Avenue, approximately 1.6 miles west of the project site. The project site is not within a Fire Hazard Severity Zones as defined by Government Code Section 51177 (CAL FIRE 2025). The project site is adjacent to a City-designated Wildland/Urban Interface Hazard Area that generally aligns with I-380 (City of San Bruno 2023). The project site is served by Station No. 51. Independent of the project, the City is pursuing rehabilitation and relocation of Stations No. 51 and No. 52, which the City considers to be outdated. Built in the mid-1950s, the stations lack many of the modern amenities considered necessary for fire service delivery and compliance with the Americans with Disabilities Act. The long-term solution is to relocate Station No. 52 to a Caltrans-owned lot on the corner of Glenview Drive and West San Bruno Avenue and to reconstruct Station No. 51 at the same location.

SBFD is also part of the San Mateo County Pre-Hospital Emergency Medical Services Group Joint Powers Authority (ALS-JPA). JPA-ALS members consist of the 20 incorporated cities in San Mateo County along with the county itself. JPA-ALS requires that the closest available paramedic engine company respond to calls for emergency medical service response within 6 minutes and 59 seconds at the 90th percentile in the Urban/Suburban zone. Fire responses require an escalating number of resources based on the life safety risk that the building presents. All fire responses in San Bruno require the assistance of neighboring jurisdictions. When an incident calls for specialized equipment or more resources, the apparatuses from either station will respond anywhere in the City. In addition, a full assignment response such as a fire, fire alarm, or other type of call, which would necessitate a larger response, requires three engines; therefore, an additional engine would need to come from a neighboring jurisdiction in an event requiring a full assignment response (Delay pers. comm.).

Response Times

Fire departments respond to a variety of life-threatening and non-life-threatening calls, including emergency calls for service and other fire-related incidents. SBFD currently has an average “call received to first unit arrival” response time of 6 minutes and 21 seconds at the 90th percentile, this meets the NFPA performance goal of 6 minutes and 30 seconds at the 90th percentile (Delay pers. comm.).

Budget and Funding

The City’s comprehensive Development Impact Fee (DIF) Ordinance requires all residential and commercial developers to pay a one-time fee charged at the issuance of building permits for new construction in the City (City of San Bruno 2025). This fee is collected and used to improve and expand public capital facilities and infrastructure throughout the City needed to serve new growth.

Police Protection Services

Staffing

The San Bruno Police Department (SBPD) employs 48 sworn officers and 11 civilian employees (City of San Bruno 2023). SBPD is a full-service policing agency providing public safety services including visible patrols, systematic gathering and documentation of intelligence information, and enforcement of laws and regulations in San Bruno. The Patrol Division responds to emergency and non-emergency requests for police assistance carried out in marked patrol vehicles, motorcycles, on foot, and on bicycles. The Support Services Section serves as a liaison to schools and facilitates the Neighborhood Watch and Citizen's Crime Preventions Committee. SBPD also contracts with various public and private agencies to provide counseling, diversion programs for at-risk youth, crossing guard services, housing of prisoners, and other services (City of San Bruno 2025).

Facilities

The project site would be served by the San Bruno Police Station at 1177 Huntington Avenue, which borders the eastside of the project site of Tanforan Shopping Center and shares facilities with Bay Area Rapid Transit (BART) police. SBPD is a full-service municipal police agency for a city of approximately 42,000 residents. The department provides a wide range of law enforcement services to the community and responds to over 32,000 calls for service each year. The police facility is a 23,000-square-foot building located at 1177 Huntington Avenue (City of San Bruno 2025).

Response Times and Performance

SBPD does not have a standard for the ratio of officers relative to the population; rather, it bases its staffing levels on the number of service calls and crime incidents. However, the City has identified a staffing ratio goal for SBPD to meet the national average of 16.6 officers for every 10,000 people (City of San Bruno 2023).

Budget and Funding

On February 26, 2019, the San Bruno City Council adopted San Bruno Municipal Code Chapter 12.260, *Development Impact Fees*, which imposes fees upon development projects to fully or partially offset the costs of public facilities and infrastructure needed to serve new demand created by development projects (City of San Bruno 2025). The ordinance requires all residential and commercial developers to pay a one-time DIF at the issuance of building permits for new construction in the City. This fee is collected and used to improve and expand public capital facilities and infrastructure throughout the City needed to serve new residential and commercial growth. A portion of the DIF, depending on whether the new construction is non-residential or residential, would be used for public safety, including police and fire capital facilities and infrastructure, including equipment (e.g., vehicles).

A general increase in property tax revenue will be received annually by the City for new development. This funding will increase general fund revenue, which may be used for police expenses, including staffing, depending on how the City Council chooses to allocate any additional funding.

Schools

The project site is served by two school districts: the San Bruno Park School District (SBPSD) and the San Mateo Union High School District (SMUHSD). These school districts are empowered to collect statutory fees (Table 3.12-1) from the construction of residential and commercial development to mitigate the impact of new development on school facilities.

Table 3.12-1. Current School Developer Fees

District	Residential	Commercial
San Bruno Park School District [a]	$3.10/square foot	$0.50/square foot
San Mateo Union High School District [b]	$2.07/square foot	$0.34/square foot

[a] SBPSD 2024
[b] SMUHSD 2025a

San Bruno Park School District

SBPSD was established in 1907 and serves the City of San Bruno with four elementary schools and one intermediate school, as listed below.

- Allen (Decima M.) Elementary (1941), 875 West Angus Avenue, San Bruno, CA 94066: Approximately 0.92 mile south of the project site.
- Belle Air Elementary (1952), 450 Third Avenue, San Bruno, CA 94066: Approximately 1.04 miles southeast of the project site.
- John Muir Elementary (1960), 130 Cambridge Lane, San Bruno, CA 94066: Approximately 1.85 miles southwest of the project site.
- Parkside Intermediate (1954), 1801 Niles Avenue, San Bruno, CA 94066: Approximately 1.33 miles south of the project site.
- Portola Elementary (1965). 300 Amador Avenue, San Bruno, CA 94066: Approximately 2.00 miles west of the project site.

Among the schools listed, the project site is served by Parkside Intermediate School, Belle Air Elementary, and Allen Elementary (San Bruno Elementary Park District n.d.).

Enrollment and Capacity

Table 3.12-2 shows SBPSD's recent past enrollments. SBPSD's total enrollment for the 2023–2024 school year was 1,950 students, a 3.4 percent decrease from the previous year (Department of Education 2025). In general, all schools in SBPSD have experienced a decline in enrollment in recent years. The California Department of Finance projects that overall K-12 enrollment in the county will decrease from approximately 86,422 for the 2021–2022 school year to 79,395 by the 2027–2028 school year (State of California, Department of Finance 2022). This is consistent with the current trend at SBPSD.

Table 3.12-2. Enrollment for the San Bruno Park Elementary School District

School	2017–2018	2018–2019	2019–2020	2020–2021	2021–2022	2022–2023	2023–2024
TOTAL	2,641	2,505	2,454	2,275	2,087	2,019	1,950

Source: California Department of Education 2025.

Budget and Funding

The SBPSD's 2022-23 adopted budget was approximately $39 million (San Bruno Park School District 2023). SBPSD's revenue sources include state funding through the Local Control Funding Formula and the Local Control Accountability Plan, property taxes, federal subsidies, mandated block grants, one-time mandated cost reimbursements, the Lottery, After School Education & Safety Grants, and other sources. SBPSD also collects fees levied on developers (a.k.a. Developer Fees). The current Developer Fees are $3.10/square foot for residential development and $0.50/square foot for commercial development. On November 5, 2024, Measure X was approved by voters and would allow SBPSD to levy a $68 per parcel tax for 8 years, generating $730,000 annually for schools and staff (San Bruno Park School District 2025).

San Mateo Union High School District

SMUHSD was established in 1902, beginning with the instruction of 27 students in a converted, two-story single-family home at 54 North Ellsworth Street (San Mateo Union High School District 2025b). SMUHSD operates one alternative high school and six comprehensive high schools throughout San Mateo County, as listed below. SMUHSD also allows students to attend any of the other comprehensive high schools through an intra-district transfer program.

- Aragon High School, 900 Alameda de las Pulgas, San Mateo, CA 94402: Approximately 7.64 miles southeast of the project site.
- Burlingame High School, 1 Mangini Way, Burlingame, CA 94010: Approximately 5.20 miles southeast of the project site.
- Capuchino High School, 1501 Magnolia Avenue, San Bruno, CA 94066: Approximately 1.94 miles south from the project site.
- Hillsdale High School, 3115 Del Monte Street, San Mateo, CA 94403: Approximately 9.41 miles southeast of the project site.
- Mills High School, 400 Murchison Drive, Millbrae, CA 94030: Approximately 3.12 miles southeast of the project site.
- San Mateo High School, 506 North Delaware Street, San Mateo, CA 94401: Approximately 6.28 miles southeast of the project site.
- San Mateo Middle College High School, 1700 W. Hillsdale Blvd. Bldg. 17, Room 154, San Mateo, CA 94402: Approximately 8.35 miles southeast of the project site.

Among SMUHSD schools listed above, the project site would be served by Capuchino High School (San Mateo Union High School District n.d.). In addition, some students enroll in private schools. While Capuchino High School is in San Bruno, students can choose to attend any of the district's schools.

Enrollment and Capacity

Table 3.12-3 shows past enrollment at SMUHSD. According to the most recent enrollment figures, SMUHSD's total enrollment for the 2023–2024 school year was 9,378, a 1.1 percent decrease over the previous year. In general, all the schools in SMUHSD have experienced a decrease in enrollment in recent years. Capuchino High School, which would serve the project site, has seen an 8 percent decrease in enrollment since the 2018–2019 school year. The California Department of Finance projects that overall K-12 enrollment in the county will decrease from approximately 86,422 for the 2018–2019 school year to 79,395 by the 2027–2028 school year (State of California 2022).

Table 3.12-3. Enrollment for the San Mateo Union High School District

School	2018–2019	2019–2020	2020–2021	2021–2022	2022–2023	2023–2024
TOTAL	9,575	9,885	9,760	9,655	9,487	9,378

Source: California Department of Education 2025

Budget and Funding

The SMUHSD's 2024-2025 proposed budget was approximately $240 million (San Mateo Union High School District 2024). SMUHSD's revenue sources include state funding through the Local Control Funding Formula and the Local Control Accountability Plan, property taxes, federal subsidies, along with other sources, SMUHSD also collects fees levied on developers (i.e., Developer Fees), The current Developer Fees are $2.07/square foot for residential development and $0.34/square foot for commercial development. On March 3, 2020 voters approved Measure L, which approved the issuance and sale of $385 million of general obligation bonds. Revenue from these bonds will finance the costs of renovating, acquiring, constructing, repairing and equipping of district buildings and other facilities.

Student Generation for SBPSD and SMUHSD

A report prepared by DecisionInsite for SBPSD determined student generation rates for each dwelling unit type in the City of San Bruno. Table 3.12-4 shows the student generation rates based on elementary school (K-5), middle school (6-8), and high school (9-12) (DecisionInsite 2019). Based on these student generation rates, Scenario B could be expected to generate approximately 212 elementary school students, 91 middle school students, and 151 high school students in the City.

Table 3.12-4. Estimated Students Generated in Multifamily Units in the City of San Bruno – Scenario B

School Type	Housing Units	Student Generation Rate [a]	Students
Elementary	1,514	0.14	212
Middle	1,514	0.06	91
High	1,514	0.10	151

[a] DecisionInsite Team 2019.

Library Services

The San Bruno Public Library is a member of the Peninsula Library System, a consortium of 32 libraries located in San Mateo County. The library was built in 1955 and expanded in 1960, and a number of mechanical, system, and structural deficiencies have been identified. As a result, the library is no longer able to adequately meet the needs of its increasingly diverse and numerous patrons. The Facility Master Plan prepared for the library in August 2000 identified a shortage of materials and resources available to San Bruno residents. The Ad Hoc Library Citizens Committee recommended two sites for a new two-story, 38,500-square-foot library facility—both within the existing Civic Center complex. The existing library structure could then be used for City Council Chambers, meeting space, and/or offices. However, the committee also recommended preparation of a parking plan in recognition of the limited parking available within the complex (City of San Bruno 2009).

The project site is served by the San Bruno Public Library. The library is housed in a 15,600-square-foot facility at 701 Angus Avenue West at the intersection with El Camino Real, adjacent to City Hall (City of San Bruno 2009) and is approximately 1.2 miles south of the project site. As of March 2025, there are currently 19,163 San Bruno Public Library card holders, which comprises approximately 45 percent of San Bruno's 42,152 residents (Ibarra pers. comm.; City of San Bruno 2025). The Facility Master Plan also found that the current library site is insufficient to support an efficient building and parking configuration. As of January 2025, the library has over 120,000 circulating items, including books, magazines, videos, DVDs, CDs, books on tape and books on CD. The San Bruno Public Library meets and exceeds the needs of circulating items though story time space and group study areas may still be needed. Because the San Bruno Public Library belongs to the Peninsula Library System, residents also have access to services from all member libraries, which partly makes up for the shortages.

3.12.3 Environmental Impact Analysis

This section describes the environmental impacts of the project on public services. It describes the thresholds used to determine whether an impact would be significant and methods used to evaluate the impacts. Measures to mitigate significant impacts are provided, where appropriate.

3.12.3.1 Thresholds of Significance

In accordance with Appendix G of the California Environmental Quality Act (CEQA) Guidelines, the project would have the potential to have a significant effect on public services if it would result in any of the following conditions.

a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

   i. Fire protection?

   ii. Police protection?

   iii. Schools?

   iv. Parks?

   v. Other public facilities?

3.12.3.2 Methodology and Approach

Potential impacts on public services are evaluated by (a) assessing the potential for the project to increase demand for public services based on goals established by service providers, and (b) comparing the ability of the service provider/public facility to serve the project and accommodate the associated increase in demand. A determination is then made as to whether the existing facilities are capable of meeting the demand of the project and, if not, if expansion of existing facilities could cause an adverse environmental effect. The analysis is based on the review of City documents, maps, reports, and communications with City service providers.

3.12.3.3 Buildout Scenario Evaluated

As discussed in Section 3.0.3.1, *Buildout Scenarios*, for each resource area studied, the EIR evaluates the buildout scenario with the greatest potential to result in a significant impact. In some cases, impacts would be the same regardless of the buildout scenario, so the analysis does not evaluate a specific buildout scenario. This approach ensures that the EIR identifies the maximum potential impacts of the project based on reasonable foreseeable development outcomes. Table 3.12-5 summarizes the approach used for each impact analysis related to public services.

Table 3.12-5. Impact Analysis Approach for Public Services

Impact Criteria	Scenario A	Scenario B	EIR Approach
Impact PS-1: Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or a 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 following public services: Fire protection? Police protection? Schools? Parks? Other public facilities?	Scenario A has more Life Science Lab & Office use.	Scenario B has more residential use.	Scenario B. Because new residents drive the demand for public services, Scenario B would be the more impactful scenario. Therefore, by and large, the analysis evaluates Scenario B. Where service populations also consider employees, the analysis evaluates both scenarios.

3.12.3.4 Fire

This analysis looks at the location of demand for fire protection services that would result from implementation of the project in relation to existing stations and assesses the need for additional stations based on information provided from SBFD. The need for additional stations is a complex issue that SBFD assesses based on a number of internal department programs and measures. (For a discussion of flammable hazards risks associated with laboratory uses see Section 3.7, *Hazards and Hazardous Materials*, pg. 3.7-20.)

SBFD considers a project's service population to include the total residential population and half of the total employment population (City of San Bruno 2023). As discussed in Section 3.11, *Population and Housing*, development under Scenario A (R&D Scenario) would result in 2,478 net new employees and 2,690 net new residents within the City's service area, while Scenario B (Residential Scenario) would result in 1,574 net new employees and 3,448 net new residents within the City's service area. Therefore, Scenario B is evaluated in the fire protection analysis for the project since its fire service population (3,448 residents + 787 employees = 4,235 fire service population increase) would be greater than that of Scenario A (2,690 residents + 1,239 employees = 3,929 fire service population).

3.12.3.5 Police

This analysis looks at the location of demand for police protection services that would result from implementation of Scenario A and Scenario B in relation to existing stations. SBPD's identified service goal is to meet the national average of 16.6 officers for every 10,000 people (City of San Bruno 2023). The need for additional stations or expansion of existing stations is evaluated based on a sworn officers-to-resident ratio, proposed plan design features, and correspondence with SBPD.

As discussed previously, SBPD tracks both residential service population and daytime service population metrics. Both Scenarios A and B would increase both the residential and daytime service populations on the project site. As both scenarios would increase services populations, and therefore increase demand on police services, both development scenarios are evaluated in the analysis of impacts on police services.

3.12.3.6 Schools

This analysis determines the increase in students that would result from implementation of the project under Scenario B and assesses potential impacts on local schools. Scenario B is evaluated since student generation is driven by residential uses. Student increases generated by the project under the Scenario B are compared with each district's existing and projected school growth and school capacity to determine whether new facilities are needed, factoring in the payment of Developer Fees.

3.12.3.7 Parks

Refer to Section 3.13, *Recreation*, for a detailed analysis of impacts related to parks and recreational areas. There are adequate park facilities included in the project for the potential increase in population.

3.12.3.8 Libraries

The library analysis evaluates whether the project would increase the demand for library service to the extent that construction of a new facility or expansion of the existing facility would be required, based on existing service capacity and anticipated demand. The City does not have an established standard or service ratio for the amount of library space per capita, though the *San Bruno General Plan* does recognize goals for various library services and facilities as described in Section 3.12.2*Environmental Setting*. The City collects library mitigation fees through its DIF Ordinance, which identifies a need for additional library facilities to serve the City's existing service population. Thus, the analysis evaluates whether payment of development impact fees under the DIF Ordinance

adequately mitigates project impacts. Because the DIF takes service population (i.e., residents and employees) into consideration in determining the application of fees to fund libraries, both development scenarios are evaluated in the analysis of impacts to libraries. The City does not have plans to build new libraries or renovate existing ones to serve the project. Future renovation or new facilities would respond to the existing need as well as the proportionate increase from the project.

3.12.3.9 Impacts Not Evaluated in Detail

This section does not evaluate impacts related to substantial adverse physical impacts associated with the provision of new or physically altered parks or a need for new or physically altered parks. Section 3.13, *Recreation*, of this EIR provides a detailed analysis of impacts related to parks and recreational areas. There are adequate recreation facilities included in the project for the potential increase in population.

3.12.3.10 Impacts and Mitigation Measures

Impact PS-1: The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or 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 or response times for fire protection (Less than Significant).

Construction

Project construction could not increase potential exposure to wildfire because the project is not in or adjacent to a very high and high Fire Hazard Safety Zones. The project site is adjacent to a City-designated Wildland/Urban Interface Hazard Area that generally aligns with I-380 (City of San Bruno 2023). Notwithstanding, the project site and vicinity are mostly developed and do not contain extensive amounts of vegetation, flammable vegetation, or other materials that have a high risk of ignition by sparks from construction activities or personnel. Additionally, the project site is generally flat and does not contain other factors, such as excessive slopes, that are known to exacerbate wildfire risks. As a result, it is not anticipated that construction activities would increase the need for fire protection services. Construction of the project, therefore, would not require new or altered fire protection facilities.

Operation

SBFD is currently averaging a "call received to first unit arrival" response time of 6 minutes and 21 seconds at the 90th percentile, which meets the NFPA performance goal of 6 minutes and 30 seconds at the 90th percentile. As discussed in Section 3.12.3.2, *Methodology and Approach*, the project would increase SBFD's service population by 4,235 persons, which could increase the number of calls for fire protection and emergency service.

As discussed previously, SBFD maintains a 0.72 per 1,000 population ratio, below the national median of 1.28 per 1,000 population and the West Coast regional median of 1.00 per 1,000 population. The addition of the project's 4,235 residents to SBFD's service population would result in a decreased firefighter-to-service-population ratio. However, SBFD is part of a JPA, which effectively extends fire service delivery capacity in San Mateo County to the entire peninsula, with the ability to pull in other engine companies if necessary. In addition, Station No. 51, which is approximately 0.7 mile south of the project site, would provide close access to the project site in the

event of a fire or medical emergency. The San Bruno Municipal Code incorporates the 2022 California Fire Code and the 2021 International Fire Code. All new construction under the project would need to be in conformance with these codes, which would require new construction to facilitate emergency access. The project would also comply with *San Bruno General Plan* policies related to fire protection services, including those aimed at mitigating impacts to fire projection (LUD-76), providing fire suppression services to San Bruno properties (PSF-F), and ensuring adequate staffing and facilities for SBFD to achieve desired levels of service, particularly surrounding transit areas (PSF-26) among others.

While the addition of 4,235 persons to SBFD's service population could increase the number of calls, this is unlikely to negatively affect response times because of the proximity of the project site to Station No. 51, and the support that can be expected through the JPA. Furthermore, the City is pursing rehabilitation or new construction of Stations 51 and 52, independent of the project. The development of the project would also increase property taxes collected by the City, which would fund City services like fire protection. Additionally, insofar as the project's DIF would go to public safety efforts, including fire capital facilities and infrastructure, including equipment (e.g., vehicles), those would have already been evaluated and identified as a need by the City. Therefore, payment of the DIF would address the project's share of the improvement and/or expansion of capital facilities and infrastructure, a need that has already been identified by the City. Therefore, no new facilities would be needed to serve the project.

Based on the above, the project would not result in substantial adverse physical environmental impacts associated with the provision of new or physically altered fire protection facilities to maintain acceptable service ratios, response times, or other performance objectives. As such, impacts on fire protection would be ***less than significant***.

Impact PS-2. The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or 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 (Less than Significant).

Construction

While construction materials would be stored on site for the duration of construction, it is typical for contractors to implement security measures such as fencing, lighting, and, in some cases, security guards or cameras. In addition, security measures during construction will be required as part of the City's Conditions of Approval. As a result, it is not expected that construction activities would result in a substantial increase in calls for police protection. No new facilities would be needed as a result of construction.

Operation

The population increase resulting from the project would result in an increase in the number of calls for law enforcement services. The police department has identified a service goal of meeting the national average of 16.6 officers for every 10,000 people. According to recent California Department of Finance data, San Bruno has a total population of 42,152 (as of January 1, 2024). With 48 sworn officers currently employed with SBPD, the City of San Bruno currently has 4.2 officers for every 10,000, below its identified goal of 16.6 officers for every 10,000 people. Both buildout scenarios would increase the number of new residents and employees in the City of San Bruno, which could

lead to an increase in demand for police department services. However, the project site was identified as a housing opportunity site in the Housing Element Update, and the nexus study identified the need for a small portable building on a yet to be determined site, which would not require construction or be anticipated to incur any potentially significant impacts (City of San Bruno 2023).

The project would be served by the San Bruno Police Station at 1177 Huntington Avenue, which is directly adjacent to the project site, and would allow for quick response times to the project site. In addition, SBPD participates in a mutual aid agreement with the other law enforcement jurisdictions in San Mateo County, though this has limited ability to provide police response services to the project site in a critical incident because additional authorization is required.

The project would require the DIF payment in accordance with San Bruno Municipal Code Chapter 12.260. The fees would be collected at the issuance of building permits and would be used to improve and expand capital improvements, including those related to public safety, infrastructure, and equipment. In addition, the increase on property taxes resulting from the new development at the project site would also fund City services including police protection and public safety.

The project would also comply with *San Bruno General Plan* policies related to police protection services, including those aimed at providing public safety for all San Bruno properties (PFS-F), ensuring adequate staffing and facilities for SBPD (PFS-26), and assuring that new development mitigates impacts on existing public services including police protection (LUD-76).

Therefore, because the project site is located close to the existing police station, as SBPD participates in a mutual aid agreement with other jurisdictions in the county, and as DIFs and increased property tax revenue resulting from the project would fund police protection and public safety, impacts on police protection would be ***less than significant***.

Impact PS-3: The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, to maintain acceptable performance objectives for schools (Less than Significant).

Construction

As discussed in Impact POP-1, construction workers would not be expected to relocate to work on the project. Therefore, there would be no additional school enrollment due to construction and no need for additional facilities.

Operation

For SBPSD, the project under Scenario B would be expected to generate approximately 212 elementary school students and 91 middle school students in the City of San Bruno. As shown in Table 3.13-2, SBPSD's enrollment has been declining, with a 3.4 percent decrease from the previous year and a 26.2 percent decrease from the 2017–2018 school year. Students generated by the project would constitute approximately 15.5 percent of the 2024 enrollment. This indicates that the addition of 212 elementary school students and 91 middle school students after this decrease of student enrollment would be within the student count that can be accommodated by existing facilities.

For SMUHSD, the project under Scenario B would be expected to generate approximately 151 high school students in the City of San Bruno. As shown in Table 3.13-3, SMUHSD's enrollment has been declining, with a 1.1 percent decrease from the previous year and a 2 percent increase from the 2018–2019 school year. Students generated by the project would constitute approximately 1.6 percent of the 2024 enrollment. This indicates that the addition of 151 high school students after this decrease of student enrollment would be within the student count that can be accommodated by existing facilities.

The project would also comply with *San Bruno General Plan* policies related to schools, including those aimed at ensuring recreation space for students (OSR-5, OSR-10) and those aimed at monitoring the growth of the school-aged population (PFS-51).

Furthermore, consistent with Government Code Sections 65995 through 65998, school impact fees will be paid to the school district prior to the issuance of building permits for the project. Payment of the impact fees would offset impacts resulting from the increase in student populations at the districts and are deemed to fully mitigate the impact of new development on school districts.[2] Therefore, impacts related to SBPSD and SMUHSD from the project would be ***less than significant***.

Impact PS-4. The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios or other performance objectives for libraries (Less than Significant).

Construction

As discussed in Impact POP-1, construction workers would not be expected to relocate to work on the project. Therefore, there would be no additional library use due to construction and no need for additional facilities.

Operation

The project would generate new library users in the City. Because 45 percent of City residents have a library card, it is presumed that 45 percent of new residents would also have a library card. Under Scenario A of the project with 2,690 net new residents, approximately 1,210 new library cards would be associated with new residents. Under Scenario B with 3,448 net new residents, approximately 1,551 new library cards would be associated with the new residents. As stated previously, the San Bruno Public Library is sufficient for current and future holders in terms of circulation items.

The project would comply with *San Bruno General Plan* policies related to libraries, including those aimed at providing a wide range of library services for all residents (PFS-55) and preventing future populations growth from burdening library services (PFD-59).

Furthermore, the San Bruno City Council has already agreed to consider the Downtown and/or Civic Center area as the preferred location for a new library, and the *San Bruno General Plan* already has established policies related to expanding existing library. The project would incrementally increase demand for library services, but this incremental increase would be offset by development impact fees, which includes fees for libraries. Therefore, impacts related to library services from the project would be ***less than significant***.

[2] Government Code Section 65995(b)(3).

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3.13 Recreation

3.13.1 Introduction

This section evaluates the potential impacts on recreation that could result from construction and operation of the Tanforan Redevelopment Project (project). This section also describes existing conditions at the project site as well as the regulatory framework for this analysis. Impacts resulting from implementation of the project, and feasible mitigation measures, where applicable, are also described.

No questions or concerns related to recreation were raised in the Notice of Preparation (NOP) (Appendix 1-1, *Notice of Preparation and Comments Received on the Notice of Preparation*).

3.13.2 Existing Conditions

3.13.2.1 Regulatory Setting

This section summarizes regulations and policies that are relevant to the analysis of the project's potential impacts on recreation.

State

Quimby Act

The Quimby Act (California Government Code Section 66477) authorizes cities and counties to pass ordinances requiring developers set aside land, donate conservation easements, or pay park-improvement fees as a condition to the approval of a tentative map or parcel map. Under the Quimby Act, fees must be paid and land conveyed directly to the local public agencies that provide park and recreation services communitywide. Revenues generated through the Quimby Act cannot be used for the operation and maintenance of park facilities. The act allows cities and counties to require the dedication of up to 3 acres of parkland per 1,000 persons residing in a subdivision subject to the act, or equal to the existing parkland ratio up to 5 acres per 1,000 residents if the existing ratio is greater than 3 acres. Exactions must show a reasonable relationship to a project's impacts as identified through studies.

The Quimby Act does not apply to new rental (apartment) units. Traditionally, developers in San Bruno fulfilled their Quimby Act requirements by paying the in-lieu fee; however, the City found this discouraged the creation of new ownership (condominium) units and was challenging to calculate and assess on applicable development projects. For this reason, the San Bruno City Council approved the new Development Impact Fee (DIF) Ordinance on February 26, 2019 (San Bruno Municipal Code Chapter 12.260), which repealed the City's Quimby Act in its entirety and instituted a more streamlined calculation methodology to fund parkland acquisitions necessary to serve all new development, including nonresidential development.

Regional and Local

San Bruno General Plan

The *San Bruno General Plan* (City of San Bruno 2009) outlines various goals, policies, and implementing programs relevant to parks and recreation. Population growth estimated under the *San Bruno General Plan* anticipates a population of 44,864 residents within the City by 2025 (City of San Bruno 2009).

The *San Bruno General Plan* includes the following policies that were adopted to avoid or mitigate environmental impacts on parks and recreational facilities and are applicable to the project (City of San Bruno 2009).

- **LUD-76:** Assure that new development mitigates impacts on existing public services, including transit services, water, sewer, and storm drainage systems, police and fire protection, libraries, and parks and recreation facilities.
- **OSR-1:** Maintain a parkland dedication/in lieu fee standard of 4.5 acres/1,000 residents.
- **OSR-5:** Strive to locate neighborhood park facilities within 1/3-mile walking distance of all residences in San Bruno. If limited in some neighborhoods, coordinate with local school districts to allow use of playgrounds and sports facilities after school hours.
- **OSR-6:** Provide small public parks and/or plazas within BART and Caltrain station areas, within Downtown, and along El Camino Real. Provide benches, water fountains, and trees to serve as resting areas for pedestrians, commuters, and shoppers.
- **OSR-9:** Actively implement the City's Comprehensive Parks and Recreational Facilities Master Plan, which more fully identifies park and recreation needs and deficiencies.
- **PFS-3:** Require, as part of plan review, identification of needed public service improvement and maintenance costs for those projects that may have a significant impact on existing services.

San Bruno Municipal Code

As previously discussed, pursuant to Section 12.260 of the City's Municipal Code, the City assesses fees upon development projects to fully or partially offset the costs of public facilities and infrastructure that is needed to serve new demand created by development projects. As established by Section 12.44 of the City's Municipal Code, the City maintains a parkland dedication/in-lieu fees standard of 4.5 acres per 1,000 residents. Effective July 1, 2023, the DIF is $31,811.21 per single-family residential unit, $29,076.19 per multi-family residential unit, $25.16 per square foot of office use, $35.35 per square foot of retail use, and $5,899.38 per hotel room (City of San Bruno 2024).

3.13.2.2 Environmental Setting

Regional Setting/San Bruno

Table 3.13-1 lists the parks in San Bruno and their distance to the project site. These existing parks offer amenities such as seating areas, walkways, picnic areas, open-play areas, playgrounds, restrooms, and tennis courts for public use. The closest parks serving the project site are the Herman Tot Lot, Commodore Park, and Bayshore Circle Park. In addition to the parks listed in Table 3.13-1, there are four recreation centers in San Bruno: the Belle Air Community Center, the San Bruno Recreation and Aquatic Center, the San Bruno Senior Center, and the Portola Performing Arts Center.

Table 3.13-1. Park and Recreational Facilities in the City of San Bruno

Park	Acres	Distance to Project Site (approximate mileage) [a]
Pocket Parks [b]		
Catalpa Tot Lot	0.5	1.6
Earl-Glenview Park	0.5	1.8
Herman Tot Lot	0.3	0.7
Lomita Park	0.3	1.9
Posy Park	0.3	0.9
Neighborhood Parks [c]		
Bayshore Circle Park	0.5	0.8
Buckeye Park	7.0	2.2
Commodore Park	4.0	0.7
Fleetwood Tot Lot	0.5	1.9
Florida Ave Park	0.5	1.4
Forest Lane Park	1.3	0.9
Grundy Park	2.8	1.4
Belle Air/Lion's Park	3	1.5
Monte Verde Park	5	2.2
Pacific Heights Park	5	2.7
Ponderosa Park	0.8	3.7
Seventh Avenue Park	0.5	1.2
Seventh and Walnut Park	0.5	1.2
Community Parks [d]		
San Bruno City Park	31	1.8
Total City Parks	*64*	--
Regional Parks [e]		
Junipero Serra Park (San Mateo County Parks)	108	2.9
Total Regional Parks	*108*	--
School District Facilities with City Joint Use Agreement [f]		
Belle Air Elementary	4	1.4
Parkside Elementary	5	1.9
Total School	*9*	--
Total Parkland	***181***	**--**

[a] Google Earth© was used to approximate the distance, which is measured in miles from the nearest point on the project site to the respective recreational facility.

[b] According to the *San Bruno General Plan* (2009), pocket parks are defined as small (less than 1-acre) facilities designed to serve residents of the surrounding blocks. They are generally limited to playgrounds and benches.

[c] According to the *San Bruno General Plan* (2009), neighborhood parks are designed to serve the residential neighborhoods close to the parks and accommodate a variety of activities including playgrounds, picnic tables, and turf areas.

[d] According to the *San Bruno General Plan* (2009), community parks are designed to serve several neighborhoods and provide a wide variety of activities, including sports facilities and recreational centers, and meet the needs of diverse users.

[e] According to the *San Bruno General Plan* (2009), regional parks are large parks and open spaces that provide recreational amenities to the surrounding region and generally contain passive facilities, such as picnicking, hiking trails, and spaces for large group events.

[f] Only public school sites with a current (2019) City joint use agreement for recreation use by the public are shown. In addition, the approved redevelopment of the former Crestmoor High School will include approximately 7 acres dedicated to the City for the development of new sports fields and amenities (not included in these totals).

South San Francisco

The project site is on the boundary between the cities of South San Francisco and San Bruno. Future project residents could foreseeably use parks and recreational facilities in South San Francisco; therefore, those facilities are considered in this analysis as well.

The City of South San Francisco Parks and Recreation Department manages more than 270 acres of parks, open spaces, and outdoor recreational facilities in the City, including 145 acres of parks and playgrounds; more than 80 acres of open space at Sign Hill Park, Oyster Point Marina, and within a community garden; and 14 acres of athletic fields, which are shared with the South San Francisco Unified School District (SSFUSD). The City of South San Francisco maintains a Joint Use Agreement with SSFUSD, which provides public use of school facilities located on SSFUSD land for an additional 95.8 acres of recreational space.

The closest City of South San Francisco Parks and Recreation Department areas serving the project site are the Centennial Way Multi-Use Trail, a 16-acre walking and bicycle trail located adjacent to the project site; the Francisco Terrace Playlot, a 0.3-acre park located approximately 0.5 miles north of the project site; and Brentwood Park, a 3.1-acre park located 0.6 miles northwest of the project site.

3.13.3 Environmental Impact Analysis

This section describes the environmental impacts of the project on recreation. It describes the thresholds used to determine whether an impact would be significant and methods used to evaluate the impacts. Measures to mitigate significant impacts are provided, where appropriate.

3.13.4 Thresholds of Significance

In accordance with Appendix G of the California Environmental Quality Act (CEQA) Guidelines, the project would have the potential to have a significant effect on recreation if it would result in any of the following conditions.

a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

b. 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?

3.13.4.1 Methodology and Approach

This analysis determines whether the increase in population that would result from implementation of the project would cause a significant impact on existing park facilities. The analysis is informed by an assessment of whether the project would impede the City from achieving its parkland-to-population ratio goal of 4.5 acres for every 1,000 residents (General Plan Policy OSR-1). As noted, the City collects parkland mitigation fees through its DIF Ordinance, which identifies a need for additional parks to serve the City's existing service population. The DIF Ordinance repealed the City's Quimby Act ordinance in its entirety and has a more streamlined calculation methodology to fund parkland acquisitions necessary to serve all new development, including nonresidential development. Thus, the analysis also evaluates whether payment of DIFs under the DIF Ordinance adequately mitigates project impacts.

3.13.4.2 Buildout Scenario Evaluated

As discussed in Section 3.0.3.1, *Buildout Scenarios*, for each resource area studied, the EIR evaluates the buildout scenario with the greatest potential to result in a significant impact. In some cases, impacts would be the same regardless of the buildout scenario, so the analysis does not evaluate a specific buildout scenario. This approach ensures that the EIR identifies the maximum potential impacts of the project based on reasonable foreseeable development outcomes. Table 3.13-2 summarizes the approach used for each impact analysis related to recreation.

Table 3.13-2. Impact Analysis Approach for Recreation

Impact Criteria	Scenario A	Scenario B	EIR Approach
Impact REC-1: 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?	Scenario A has more Life Science Lab & Office use.	Scenario B has more residential use.	Scenario B. Because new residents drive the demand for parks and recreational space, Scenario B would be the more impactful scenario. Therefore, the operational analysis evaluates Scenario B.
Impact REC-2: Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	Scenario A has less public and private recreational space.	Scenario B has more public and private recreational space.	Scenario B. Scenario B proposes the construction of more public and private recreational space. Therefore, the operational analysis evaluates Scenario B.

3.13.4.3 Impacts and Mitigation Measures

Impact REC-1: The project would not increase use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would not occur or be accelerated (Less than Significant).

Construction

Construction of the project, including the site preparation and building demolition phases, would temporarily increase construction employment in the City. The number of construction workers per day would vary, depending on the construction phase, with an average of approximately 327 workers onsite for Scenario A and 328 workers onsite for Scenario B. No construction workers are expected to relocate for construction of the project. In addition, it is unlikely that construction workers would visit the nearest parks during their lunch breaks or after work; however, if that were to occur, use would most likely be modest and would not increase physical deterioration of any facilities. As such, the project would not cause or accelerate the physical deterioration of existing neighborhood and regional parks or other recreational facilities during construction. Therefore, impacts would be ***less than significant***.

Operation

As explained in Table 3.13-2, Scenario B was used as the basis for this analysis, because implementation of Scenario B would result in the development of more residential units than Scenario A. Under Scenario B, the project would include 1,514 dwelling units, 170 hotel rooms, and 1,229,000 net new square feet of R&D/Office space. As stated in Section 3.14, *Population and Housing*, Scenario B is anticipated to generate 3,448 net new residents and 1,574 net new employees at the project site. These residents and employees and their families could use the City's existing park facilities, increasing the demand for those facilities.

As shown in Table 3.11-2 in Section 3.11, *Population and Housing*, the Association of Bay Area Governments (ABAG) estimates that the population of San Bruno in 2025 is 42,630. As shown in Table 3.13-1, the City and surrounding region provide 191 acres of existing parkland, equating to 4.48 acres for every 1,000 residents, just shy of the City's goal of 4.5 acres for every 1,000 residents (General Plan Policy OSR-1). The City currently does not have plans to build or renovate existing parks that could serve the project (Gilli pers. comm.). With implementation of the project, the City would continue to be slightly deficient in meeting its parkland-to-population ratio.

Based on the City's goal of 4.5 acres for every 1,000 residents (General Plan Policy OSR-1), the project would require the provision of approximately 15.52 acres of parkland to serve the new residents and employees and their families. The project would meet this increased park demand through the provision of publicly accessible open space, including a retail garden/courtyard, an office/lab amenity courtyard, pathways, landscaped areas, outdoor gathering spaces and plazas, and other open spaces such as landscaped parkways and programmable roads that could be used for public recreational areas. Site furniture would also include built-in seating elements, picnic tables and benches, a fireplace area, and moveable outdoor furniture. In addition, each of the buildings with residential units would include private recreational facilities, such as pools and spas, courtyards, fitness areas, and dog runs. Private open space areas, such as balconies and patios, would be provided. Overall, the project (under Scenario B) would include up to 99,000 square feet of publicly accessible open space and up to 251,000 square feet of private tenant/residential open space for a total of approximately 8 acres of open space. Thus, the proposed onsite private and

public amenities would not meet City's goal of 4.5 acres for every 1,000 residents, and there would be an increased demand for parks and recreational needs that would be generated by project residents.

The City collects parkland mitigation fees through its DIF Ordinance, which identifies a need for additional parks to serve the City's existing service population. The DIF Ordinance repealed the City's Quimby Act ordinance in its entirety and has a more streamlined calculation methodology to fund parkland acquisitions necessary to serve all new development, including nonresidential development. Thus, the project would be required to comply with the City's DIF Ordinance or pay development fees, which would be used, in part, to acquire properties on which to build new park sites. New facilities would be subject to their own independent CEQA review. Therefore, payment of the DIF would be an additional way to ensure that the project's share of the improvement and/or expansion of capital facilities and infrastructure, is addressed. According to City staff, the project would not directly necessitate the construction of new parks or recreational facilities, but payment of established impact fees would be another way to address the project's proportionate share of increased demand, in addition to providing the onsite private and public open space (Gilli 2025).

While the project could also increase usage of parks and recreational facilities in the adjacent City of South San Francisco, given the approximately 270 acres of parks and open space available in South San Francisco, as discussed in Section 3.13.2.2, *Environmental Setting*, and the project's provision of on-site recreational amenities, which would offset demand for public parks and recreational facilities, any additional demand placed on South San Francisco parks would be expected to be less than significant.

Based on the analysis above, it is anticipated that the project would result in some increased demand and usage of parks and recreation facilities, but payment of established impact fees would address the project's proportionate share of increased demand for public parks and recreational facilities, in addition to providing onsite private and public open space at the project site. Therefore, impacts would be ***less than significant***.

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

As discussed previously, with implementation of the project, the City would still be slightly deficient in meeting its service goal of 4.5 acres for every 1,000 residents set forth under Policy OSR-1 of the City's General Plan. However, the project would provide onsite private and public amenities, as well as comply with the City's DIF Ordinance or pay development fees to address the project's proportionate share of increased demand improvement and/or expansion of capital facilities and infrastructure. Therefore, the project would not add to the existing demand for park and recreational facilities such that the construction of new facilities, other than those included in the project, would be required.

The project (under Scenario B) would include up to 99,000 square feet of publicly accessible open space and up to 251,000 square feet of private tenant/residential open space, the environmental impacts of which are analyzed throughout this EIR. As discussed previously, the project would meet increased park demand through the provision of publicly accessible open space, including a retail garden/courtyard, an office/lab amenity courtyard, pathways, landscaped areas, outdoor gathering spaces and plazas, and other open spaces such as landscaped parkways and programmable roads that could be used for public recreational areas. Site furniture would also include built-in seating

elements, picnic tables and benches, a fireplace area, and moveable outdoor furniture. The added open space, consisting of landscaped sidewalks and outdoor seating areas, would provide a buffer and transition between the project's land uses. The final design of open spaces would be subject to review and approval by the City.

The privately owned, publicly accessible open space on the project site would not be dedicated parkland and would not be considered part of the City's parkland. Furthermore, it would not affect park service ratios; however, it would offset park usage from project-generated residents and employees. In addition, according to City staff, the project would not directly necessitate the construction of new parks or recreational facilities, but payment of established impact fees would be another way to address the project's proportionate share of increased demand, in addition to providing the onsite private and public open space. The environmental impacts associated with the park and recreational space provided by the project are discussed throughout the applicable resource chapters of this EIR. In summary, the project would not directly necessitate the construction of new parks or recreational facilities, the construction of which could have significant environmental impacts. Therefore, impacts would be ***less than significant***.

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3.14 Transportation

3.14.1 Introduction

This section evaluates the potential impacts on transportation that could result from construction and operation of the Tanforan Redevelopment Project (project). This section also describes existing conditions at the project site as well as the regulatory framework for this analysis. Impacts resulting from implementation of the project, and feasible mitigation measures, where applicable, are described.

Relevant technical documentation used in this analysis includes the following technical studies prepared for the project.

- The Tanforan Redevelopment Project Transportation Analysis Summary (Appendix 3.14-1, *Tanforan Transportation Analysis Summary*)
- The Tanforan Redevelopment Project Level of Service Analysis Memo (Appendix 3.14-2, *Level of Service Analysis Memo*)

Issues identified in response to the Notice of Preparation (NOPs) (Appendix 1-1, *Notice of Preparation and Comments Received on the Notice of Preparation*) were considered in preparing this analysis. The NOP comments pertaining to transportation include:

- A recommendation by Bay Area Rapid Transit (BART) to incorporate an evaluation of impacts on the BART system, specifically the San Bruno station, and to analyze impacts on all roadway users, not just drivers. These issues are addressed in Section 3.14.3.4, *Impacts and Mitigation Measures*.
- A recommendation by Caltrans about travel demand analysis, construction-related impacts, equitable access, and encroachment permits. These issues are addressed in Section 3.14.3.4, *Impacts and Mitigation Measures*.
- A recommendation by San Francisco International Airport (SFO) to incorporate an evaluation of public transit delay and vehicle miles traveled impacts. These issues are addressed in Section 3.14.3.4, *Impacts and Mitigation Measures*.

3.14.2 Existing Conditions

3.14.2.1 Regulatory Setting

This section summarizes regional and local regulations and policies that are relevant to the analysis of the project's potential impacts on transportation.

A jurisdiction is a level of government (city, county, state, or federal) or regulatory authority (local, regional, state, or federal) that is responsible for some or all aspects of the planning, implementation, operations, and maintenance of transportation facilities and services in a defined area. The City of San Bruno has jurisdiction over all public City streets and City-operated traffic signals. The neighboring cities of South San Francisco, Pacifica, and Millbrae have jurisdiction over local roadways within their respective jurisdictional boundaries. The California Department of Transportation (Caltrans) has jurisdiction over state facilities, including US 101, Interstate (I-) 280,

I-380, State Route (SR) 35 (Skyline Boulevard), and SR 82 (El Camino Real). Caltrans also has jurisdiction over on- and off-ramp intersections with local streets. San Mateo County has jurisdiction over streets in unincorporated areas. Streets and intersections within SFO boundaries are owned and policed by the City and County of San Francisco. Transit agencies that operate within the city limits are the San Mateo County Transit District (SamTrans), Caltrain, BART, and Commmute.org. Several of the regional, state, and federal agencies that are described in the following sections have jurisdiction over transportation planning and implementation of circulation improvements in the City of San Bruno.

The City of San Bruno guides land use planning decisions within the city's boundaries. The City's existing planning documents and Zoning Code guide development review. In the project area, this includes the San Bruno General Plan (2009), the San Bruno Walk 'N Bike Plan (2016), the Transit Corridors Plan (2013), and the Local Road Safety Plan (2023). The City completed a Zoning Code update in 2021.

Federal

Americans with Disabilities Act of 1990

The Americans with Disabilities Act of 1990 (revised 2010) is a landmark civil rights law that prohibits discrimination based on disability. Titles I, II, III, and V of the act have been codified in Title 42 of the United States Code, beginning at Section 12101. Title III prohibits discrimination on the basis of disability in "places of public accommodation" (businesses and nonprofit agencies that serve the public) and "commercial facilities" (other businesses). The regulation includes Appendix 4.13-A to Part 36 (Standards for Accessible Design), which establishes minimum standards for ensuring accessibility for persons with a disability when designing and constructing a new facility or altering an existing facility, including roadways, parking lots, and sidewalks.

The Public Rights-of-Way Accessibility Guidelines (PROWAG) provide updated and more specific guidance for accessibility in public rights-of-way. PROWAG supplements existing Americans with Disabilities Act guidelines and includes key updates to address unique challenges in the public realm, such as sidewalks, pedestrian crossings, curb ramps, and pedestrian signal systems. For example, PROWAG requires detectable warnings for pedestrians entering traffic at curb ramps and stipulates a clear pedestrian access route with a minimum width of 48 inches. It also introduces detailed requirements for accessible pedestrian signals and considerations for street furniture placement to ensure an unobstructed travel path.

Federal Highway Administration

The Federal Highway Administration is the agency of the U.S. Department of Transportation responsible for the federally funded roadway system, including the interstate highway network and portions of the primary state highway network, such as I-280, I-380, and US 101.

State

California Department of Transportation

Caltrans has authority over the state highway system, including freeways, interchanges, and arterial routes. The *Guide for the Preparation of Traffic Impact Studies* (Caltrans 2001) provides information that Caltrans uses to review impacts on state highway facilities, including freeway segments. This guidance was updated by the *Local Development – Intergovernmental Review Program Interim Guidance* published in November 2016 for consistency with Senate Bill (SB) 743.

The Caltrans Division of Design oversees the development of roadway designs that align with safety, sustainability, efficiency, and other multimodal transportation goals. This division integrates engineering principles and design innovations to ensure highway and local road projects meet state and federal standards. Their work affects land use projects including the Tanforan Redevelopment Project, as transportation design must accommodate evolving uses and design standard best practices, such as mixed-use developments, transit hubs, and pedestrian-friendly environments.

The Division of Design issues Design Information Bulletins (DIBs), which are technical documents issued by Caltrans to guide the implementation of specific design standards or policies. DIB-94, titled *Complete Streets: Contextual Decision Guidance*, emphasizes the importance of considering all road users—drivers, pedestrians, cyclists, and transit riders—in design decisions. It establishes a framework for incorporating multimodal transportation features in state highway projects.

State Transportation Improvement Program

The California Transportation Commission administers transportation programming, which is the public decision-making process that sets priorities and funds projects that have been envisioned in long-range transportation plans. The California Transportation Commission commits expected revenues for transportation projects over a multi-year period. The State Transportation Improvement Program is a multi-year capital improvement program for transportation projects both on and off the state highway system. The State Transportation Improvement Program is funded with revenues from the State Highway Account and other funding sources. State Transportation Improvement Program programming typically occurs every 2 years.

California Transportation Plan 2050

The *California Transportation Plan 2050* was adopted in 2021 (Caltrans 2021). The plan, which is overseen by Caltrans, serves as a blueprint for California's transportation system, as defined by goals, policies, and strategies to meet the state's future mobility needs. The goals defined in the plan fall into eight categories: safety, climate, equity, accessibility, quality of life and public health, economy, environment, and infrastructure. Each goal is tied to specific objectives and performance measures. In turn, members from regional and metropolitan planning agencies report these performance measures to Caltrans.

Assembly Bill 32 and Senate Bill 375

With the passage of Assembly Bill (AB) 32, the Global Warming Solutions Act of 2006, the State of California committed itself to reducing greenhouse gas (GHG) emissions to 1990 levels by 2020. The California Air Resources Board (CARB) has led the state's climate planning efforts, beginning with the adoption of its *Proposed Scoping Plan for AB 32* in 2008. In 2011, CARB completed its major rulemaking for reducing GHG emissions. Rules on emissions, as well as market-based mechanisms

such as the cap-and-trade program, took effect on January 1, 2012. More recently, CARB released the *2022 Scoping Plan for Achieving Carbon Neutrality*, which represents the state's ambitious roadmap for achieving carbon neutrality by 2045. This plan emphasizes a transition to renewable energy, widespread electrification, sustainable land management, and reductions in fossil fuel reliance. Central themes include the transition to clean energy through 100 percent renewable electricity, the rapid adoption of zero-emission vehicles (ZEVs), and substantial investment in electrification across industries. The plan also underscores the importance of natural and working lands in carbon sequestration and advocates for carbon capture, utilization, and storage technologies to address emissions that cannot be mitigated. Equity is another critical focus of this updated scoping plan, with efforts to ensure that climate actions reduce health and economic disparities in disadvantaged communities.

SB 375 provides guidance regarding curbing emissions from cars and light trucks to help the state comply with AB 32. There are four major components to SB 375. First, SB 375 requires regional GHG emissions targets. CARB's Regional Targets Advisory Committee will guide the adoption of targets to be met by 2020 and 2035 for each Metropolitan Planning Organization (MPO) in the state. These targets, which MPOs may propose themselves, must be updated every 8 years in conjunction with the revision schedule of the housing and transportation elements of local general plans. Second, MPOs are required to create a Sustainable Communities Strategy (SCS) that provides a plan for meeting regional targets. The SCS and the Regional Transportation Plan (RTP) must be consistent, including action items and financing decisions. If the SCS does not meet the regional target, the MPO must produce an Alternative Planning Strategy that details an alternative plan for meeting the target. Third, SB 375 requires regional housing elements and transportation plans to be synchronized on 8-year schedules. In addition, Regional Housing Needs Assessment allocation numbers must conform to the SCS. If local jurisdictions are required to rezone land as a result of changes in the housing element, rezoning must take place within 3 years of adoption of the housing element. Finally, MPOs must use transportation and air emissions modeling techniques that are consistent with the guidelines prepared by the California Transportation Commission. Regional Transportation Planning Agencies, cities, and counties are encouraged, but not required, to use travel demand models that are consistent with California Transportation Commission guidelines. The adopted RTP, per SB 375 (Plan Bay Area 2050), is discussed under the *Regional* regulatory setting.

Complete Streets (AB 1358 and SB 960)

AB 1358, also known as the California Complete Streets Act of 2008, requires cities and counties to include "complete street" policies in their general plans. These policies address the safe accommodation of all users, including bicyclists, pedestrians, motorists, public transit vehicles and riders, children, the elderly, and persons with disabilities. These policies can apply to new streets, as well as the redesign of corridors.

SB 960, signed into law in September 2024, focuses on improving complete streets planning and design on Caltrans-managed roadways. The law requires Caltrans to integrate the needs of cyclists, pedestrians, and transit users into roadway maintenance and rehabilitation projects. It mandates the establishment of active transportation targets within the State Highway Operation and Protection Program and emphasizes transit priority improvements. The goal is to enhance safety, accessibility, and equity for all road users, ensuring that streets accommodate diverse transportation modes.

The requirements of AB 1358 and SB 960 only apply to publicly owned and operated streets. Nonetheless, the project may still incorporate design features aligned with complete streets principles to promote safety and accessibility for all users.

Senate Bill 743

Since the passage of SB 743 in September 2013, adoption of the revised California Environmental Quality Act (CEQA) Guidelines in 2018, and subsequent statewide implementation in July 2020, vehicle miles traveled (VMT) has replaced level of service (LOS) as the primary criterion for evaluating transportation impacts under CEQA. This transition reflects a shift in focus from measuring driver delay to assessing the environmental impacts of driving. VMT evaluates the total daily miles traveled by vehicles, aligning the transportation analysis with California's goals to reduce GHG emissions, promote infill development, and encourage active transportation.

Projects that feature higher land use density, mixed-use components, proximity to jobs or transit, and walkable or bikeable locations typically exhibit lower VMT impacts. While the Governor's Office of Land Use and Climate Innovation, formerly the Governor's Office of Planning and Research (OPR), provides VMT guidance, lead agencies maintain discretion in determining methodologies, thresholds, and mitigation strategies, provided they align with SB 743's objectives (Governor's Office of Planning and Research 2016). Lead agencies must prove that their selected analysis methodology aligns with SB 743's goals to promote infill development, reduce GHGs, and reduce VMT.

Regional and Local

Metropolitan Transportation Commission

Metropolitan Transportation Commission (MTC) is the Bay Area's regional transportation planning agency and federally designated MPO. MTC is responsible for preparing the RTP, a comprehensive blueprint for the development of mass transit, highway, airport, seaport, railroad, bicycle, and pedestrian facilities. The RTP is a 20-year plan that is updated every 3 years to reflect new planning priorities and changing projections of future growth and travel demand. The long-range plan must be based on a realistic forecast of future revenues, and the transportation projects taken as a whole must help improve regional air quality. MTC also screens requests from local agencies for state and federal grants for transportation projects to determine compatibility with the RTP.

Plan Bay Area 2050/2050+

Plan Bay Area 2050 (ABAG and MTC 2021) is overseen by MTC and the Association of Bay Area Governments (ABAG). It serves as the region's SCS and the 2050 RTP (preceded by *Plan Bay Area 2040* [ABAG and MTC 2018]), integrating transportation and land use strategies to manage GHG emissions and plan for future population growth. The RTP and SCS include policies that call for shifting more travel demand to transit and accommodating growth along transit corridors in Priority Development Areas. In October 2021, *Plan Bay Area 2050* was adopted by ABAG and MTC. Major projects included in *Plan Bay Area 2050* include high-speed rail along the Caltrain corridor, Caltrain electrification, express lanes on US 101 in San Mateo County, and improvements to local and express bus services, including bus rapid transit services along El Camino Real from Daly City BART to Palo Alto Caltrain station. ABAG and MTC have also launched the *Plan Bay Area 2050+* effort, an update to the adopted plan that will reflect new data, policy priorities, and regional needs, that focus on lessons learned since adoption of Plan Bay Area 2050. Key priorities of the *Plan Bay*

Area 2050 update include increasing public awareness of the plan's purpose and strategies, refining plan strategies based on past implementation efforts, and updating assumptions to better reflect post-COVID conditions. The plan update is expected to be adopted by MTC and ABAG in late 2025 and will serve as the Bay Area's RTP and SCS.

Bay Area Air Quality Management District

The Bay Area Air Quality Management District is the regional agency with the authority to develop and enforce regulations for the control of air pollution throughout the Bay Area. The Clean Air Plan is the district's plan for reducing the emissions of air pollutants that combine to produce ozone. The Bay Area Air Quality Management District has published guidelines for the purpose of evaluating the air quality impact of projects and plans. Transportation Control Measure TR10 calls for general plans to support implementation of Plan Bay Area and collaborate with regional partners to identify innovative funding mechanisms to help local governments address air quality and climate change in their general plans (BAAQMD 2017).

On-road motor vehicles are one of the largest sources of air pollution in the Bay Area (BAAQMD 2017). To address the impact of vehicles, the California Clean Air Act requires air districts to adopt, implement, and enforce transportation control measures.

San Francisco Bay Area Rapid Transit District

The project site is adjacent to San Bruno BART station owned and operated by BART. BART is a heavy-rail public transit system that connects the San Francisco Peninsula with communities in the East Bay and South Bay. The BART District includes the Counties of Alameda, Contra Costa, and San Francisco and is governed by a nine-member Board of Directors, who are elected directly by the public. Of particular relevance to this project, in June 2016, the BART Board of Directors adopted a new Station Access Policy to guide access practices and investments through 2025 (BART 2016). The BART *Walk And Bicycle Network Gap Study* (2020) includes specific recommendations for the San Bruno BART station area.

El Camino Real Bus Speed and Reliability Study

The *El Camino Real Bus Speed and Reliability Study* (SamTrans 2022a) aims to improve transit efficiency along SR 82 (El Camino Real), spanning from Daly City to Palo Alto. This study is part of broader efforts to enhance bus performance and reliability across San Mateo County through strategies such as transit signal priority, bus stop balancing, and infrastructure upgrades.

Specific recommendations for the City of San Bruno include potential implementation of transit signal priority measures to extend green lights for buses, bus stop balancing, and capital improvements, such as pedestrian access enhancements and bus bulbs (curb extensions). These efforts align with the overarching goals of the study: to reduce travel times, improve rider experiences, and support regional connectivity.

City/County Association of Governments of San Mateo County Congestion Management Program

As the designated Congestion Management Agency for San Mateo County, the City/County Association of Governments of San Mateo County (C/CAG) is primarily responsible for administering the state-mandated Congestion Management Program (CMP) (C/CAG 2023). San Mateo C/CAG designated CMP roadway system components in San Bruno include SR 35 (Skyline Blvd.), SR 82 (El Camino Real), US 101, I-380, and I-280.

San Mateo C/CAG is also responsible for preparing the Countywide Transportation Plan, which establishes a long-range transportation vision for the county and informs the RTP/SCS prepared by MTC and ABAG. The current version of the plan looks at horizon year 2050 and was adopted in October 2021. San Mateo C/CAG also partners with local jurisdictions and other transportation agencies to develop transportation plans and studies for areas and projects with countywide and regional significance. San Mateo C/CAG maintains the countywide C/CAG-VTA Travel Model and has a countywide threshold of 100 added peak-hour trips when determining whether a Transportation Demand Management (TDM) plan for development projects is required; however, single-family homes are exempted due to the limited effectiveness of TDM plans for reducing vehicle trips for this type of land use.

San Mateo County Transit District

SamTrans is the administrative body for the principal public transit and transportation programs in San Mateo County: SamTrans bus service, including Redi-Wheels & RediCoast paratransit service; Caltrain commuter rail; and the San Mateo County Transportation Authority. Caltrain and the San Mateo County Transportation Authority have contracted with SamTrans to serve as their managing agency, under the direction of their appointed boards.

SamTrans' Short-Range Transit Plan (SamTrans 2022b) is a federally mandated planning document that describes the plans, programs, and goals of the SamTrans transit service. It has a 10-year planning horizon and is updated annually, and it focuses on the characteristics and capital needs of the existing system and on committed (funded) expansion plans. The current plan proposes increased service levels for fixed-route transit, including new express bus routes, increased paratransit services, and increased commuter shuttles. SamTrans will also continue to contribute monetarily to Caltrain service and replace and expand the bus vehicle fleet.

San Mateo County Comprehensive Bicycle and Pedestrian Plan 2021

San Mateo County Comprehensive Bicycle and Pedestrian Plan 2021 (C/CAG 2021) was developed by C/CAG, with support from the San Mateo County Transportation Authority, to address issues regarding the planning, design, funding, and implementation of bicycle and pedestrian projects countywide. The following are relevant goals and policies for the project.

- **Goal 4:** Advance Complete Streets Principles and the Accommodation of All Roadway Users
    - **Policy 4.1:** Comply with the complete streets requirements of Caltrans and the Metropolitan Transportation Commission concerning safe and convenient access for bicyclists and pedestrians and assist local implementing agencies in meeting their responsibilities under the policy.

San Bruno General Plan

The *San Bruno General Plan* (City of San Bruno 2009) was adopted March 24, 2009. The state requires every city and county in California to prepare a general plan to guide decision-making by the City Council, Planning Commission, City departments, and other governmental agencies on specific development applications. The *San Bruno General Plan* has identified Transportation, Land Use and Urban Design, and Open Space and Recreation policies related to access and mobility. These policies include measures such as providing efficient local transit to BART and Caltrain, maintaining acceptable LOS for vehicular movement along the street network, and focusing San Bruno's efforts on improvements to the nonmotorized transportation system adjacent to transit corridors and stations. These measures support multimodal transportation design throughout the City of San

Bruno while promoting efficient, safe, and pleasant movement for all transportation modes. San Bruno recently updated its Housing Element of the general plan. On August 27, 2024, the City adopted an amended 2023–2031 Housing Element, and on October 21, 2024, the California Department of Housing and Community Development found the element to be in substantial compliance with state law.

San Bruno Transit Corridors Specific Plan 2013

The Traffic Control Plan (TCP) was adopted February 12, 2013; it articulates the community's vision for revitalized commercial corridors in proximity to the San Bruno Avenue Caltrain station and BART station. The TCP planning area includes the portion of Huntington Avenue between San Bruno Avenue and the San Bruno BART station, as well as Huntington Avenue itself up to Sneath Lane. Guiding policies included in the TCP are listed in Table 3.14-1. Implementation policies in the TCP were also referenced while evaluating the project. The TCP applies to roadways and transportation facilities and services in the vicinity that will serve and be affected by the project and includes policies whose implementation may have an effect on the project.

Table 3.14-1. Traffic Control Plan Guiding Policies

Policy	Text
TRANS-A	Promote the development of the Transit Corridors Area's street and intersection network that supports the proposed intensification of land uses, while providing mobility for all travel modes.
TRANS-B	Ensure increased transit connectivity within and to/from the Transit Corridors Area and provide for transit amenities at stops and stations that increase the visibility of stops/stations and improve the comfort and convenience for transit riders.
TRANS-C	Encourage improved bicycle connectivity and enhanced bicycle parking opportunities within the Transit Corridors Area linking the surrounding land uses and future Caltrain station.
TRANS-D	Facilitate pedestrian access and safety through pedestrian enhancements, including the provision of enhanced crosswalks at all intersections and wider sidewalks and pedestrian amenities along the transit corridors.
TRANS-E	Develop and implement a parking management strategy for the Plan area that makes efficient use of the City's parking supply through shared parking strategies and that provides the lowest number of parking spaces, while still maintaining the viability of the Plan through efficient use of the parking supply within the Plan Area.
TRANS-F	Develop and implement a TDM Program that reduces the amount of peak-period motor vehicle traffic and encourages the use of modes other than the single-occupant vehicle.

San Bruno Walk 'N Bike Plan

The San Bruno Walk 'N Bike Plan was adopted July 26, 2016 (City of San Bruno 2016). The plan presents the desired state of walking and biking in San Bruno 10 years out that would result from implementation of the plan.

In recognizing the public's desire for an improved network of sidewalks, street crossings, bike lanes, bike routes, and walking and biking paths and trails to access more destinations, the City aims to provide access to an expanded range of programs, events, and activities in the areas of pedestrian and bicycle safety, education, encouragement, and promotion.

The public views walking and biking in a positive light by recognizing the benefits of these modes to personal and public health, mobility, neighborhood livability, social interaction, the local economy, and the environment, and it supports continued improvements. The City administration also recognizes the benefits and embraces opportunities to integrate walking and biking as vital parts of a more balanced multimodal transportation network by developing new facilities, improving existing ones, enhancing traffic enforcement, and adopting other supportive policies and practices. The City of San Bruno is experiencing a trend of an ever-increasing transportation mode shift away from driving and toward walking and biking.

Chapters 5 through 8 of the Walk 'N Bike Plan identify specific infrastructure projects and program action items that would implement the City's vision.

San Bruno Local Roadway Safety Plan

The *Local Roadway Safety Plan* (City of San Bruno 2023) creates a framework for the City of San Bruno to systemically identify and analyze traffic-safety issues, including high-risk locations and emphasis areas, and recommend projects and countermeasures to enhance safety on roadways throughout the City. The plan establishes goals to improve pedestrian and bicyclist safety, coordinate action across key stakeholders to ensure implementation of suggested countermeasures and projects, as well as ensure that safety improvements are equitably implemented.

Five safety projects were selected for implementation at high-risk intersections and roadway segments.

- **Signalized Intersections.** Enhancing traffic signals by upgrading hardware, improving visibility with retroreflective borders, converting signals to mast arms, adding pavement markings, and optimizing signal timing.
- **Pedestrian & Bicyclist Safety at Signalized Intersections.** Installing bike boxes, implementing Leading Pedestrian Intervals, and improving pavement friction to reduce crashes.
- **Safety at Unsignalized Intersections.** Installing new traffic signals, upgrading stop signs and warning signs, and enhancing intersection pavement markings for better visibility.
- **Roadway Segments.** Improving lighting, upgrading signage with fluorescent sheeting, adding delineators and reflectors, and enhancing pavement friction for safer road conditions.
- **Pedestrian & Bicyclist Safety on Roadway Segments.** Installing separated bike lanes, upgrading pedestrian crossings with enhanced features, and adding Rectangular Rapid Flashing Beacons (RRFB) for increased visibility.

3.14.2.2 Environmental Setting

This section provides a discussion of the existing conditions related to transportation and traffic around and within the project site.

Regional Setting

Roadway System

Four prominent regional routes surround the project site: US-101, I-280, I-380, and SR 82/El Camino Real. The regional and local circulation system in the vicinity of the project site is shown in Figure 3.14-1.

- **US 101.** US 101 is a major north–south freeway in San Mateo County and provides regional access to the project site. The freeway is about a mile east of the project site and extends southward to Santa Clara and beyond and northward to San Francisco and beyond. Near the project site, the freeway provides four travel lanes in each direction and occasionally an auxiliary lane in both the northbound and southbound directions. There are high-occupancy vehicle (HOV) lanes in both the northbound and southbound directions between I-380 to the north and SR-237 to the south. The I-380/US 101 interchange provides the most direct access to the project site, although the entrance and exit ramps at San Bruno Avenue provide an alternative route.
- **I-280.** I-280 is a north–south freeway that runs north from San Jose to San Francisco. The I-380/ I-280 interchange and entrance and exit ramps at San Bruno Ave/Sneath Lane provide the most direct access to the project site. There are no HOV lanes on I-280 in San Mateo or San Francisco Counties. Near the project site, there are four travel lanes in each direction and occasionally an auxiliary lane in both the northbound and southbound directions.
- **I-380.** I-380 is a 1.7-mile east–west freeway in San Mateo County that connects I-280 with US 101. The SR 82 and I-380 junction wraps the southwestern corner of the project site, and I-380 serves as the entire southern boundary for the project site. There are four travel lanes in the westbound and eastbound directions and no HOV lanes on the freeway.
- **SR 82/El Camino Real.** SR 82/El Camino Real refers to a segment of the historic "King's Highway" route through Southern and much of Northern California. SR 82/El Camino Real defines the section of this route that runs north–south along the southwestern boundary of San Francisco Bay, connecting I-880 in San Jose with San Francisco. The six-lane roadway parallels Caltrain tracks for much of its route through San Mateo County. Although traffic volumes and speed limits are lower than on the surrounding freeways, SR 82/El Camino Real is an important regional route that connects many downtowns and important commercial centers along the peninsula. SR 82/El Camino Real is also the primary bus transit route through San Bruno and surrounding cities. SR 82 serves as the western boundary for most of the project site except for the parcel located north of Sneath Lane and west of Huntington Avenue. Near the project site, there are sidewalks on both sides of SR 82/El Camino Real, but no bicycle facilities.

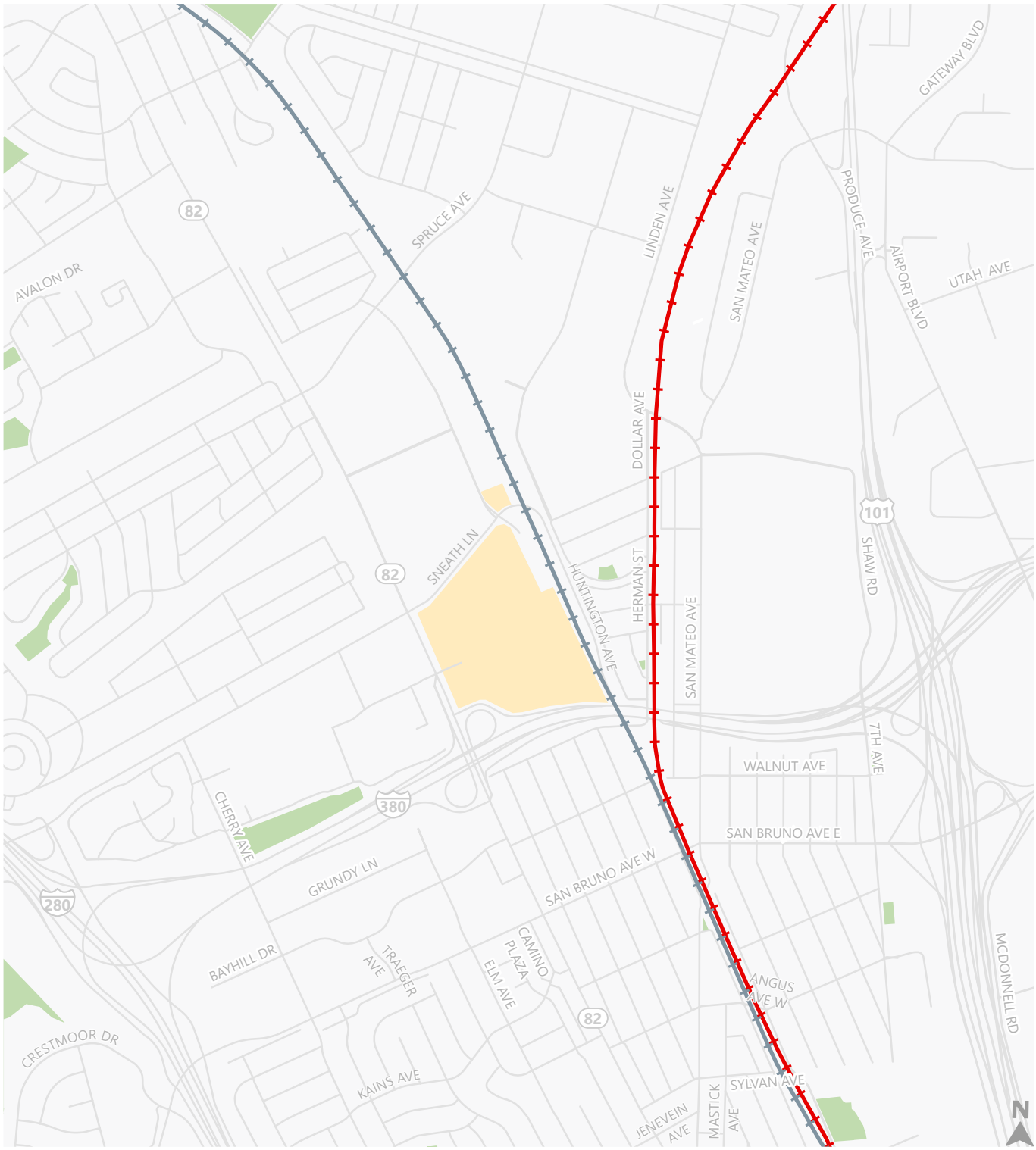

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Figure 3.14-1
Regional and Local Roadways

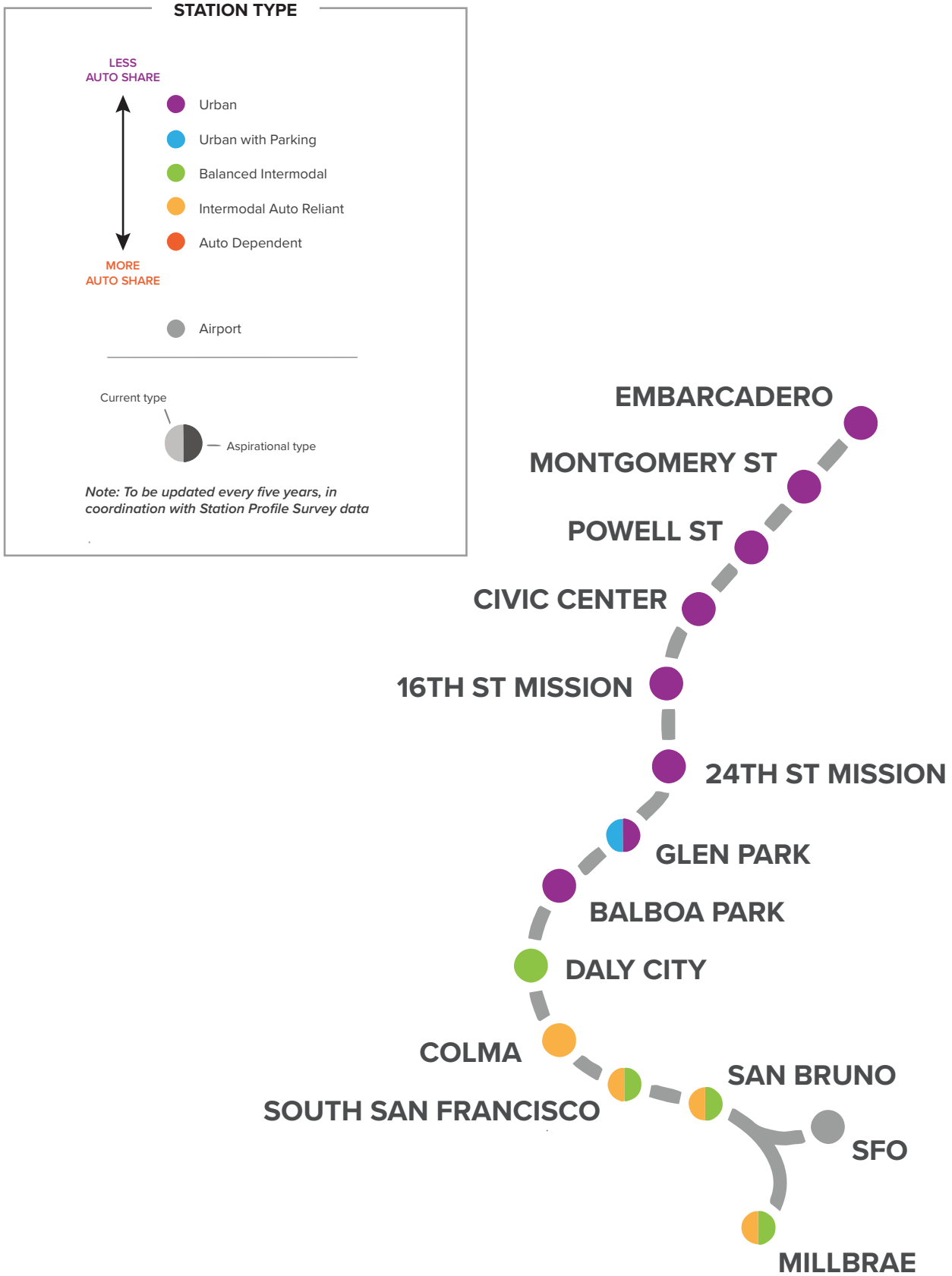
Transit

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. The San Bruno BART station is directly adjacent to the project site. The San Bruno Caltrain station is 0.5 mile walk from the southern edge of the project site. BART's Station Access Policy (BART 2016) assessed the current and aspirational station type for every station in the system based on current and potential mode share. As shown in Figure 3.14-2, the San Bruno station is currently an intermodal auto-reliant station while balanced intermodal is its aspirational station type.

Bus service near the project site is provided along San Bruno Avenue, SR 82/El Camino Real, Sneath Lane, Huntington Avenue, and I-380. Figure 3.14-3 illustrates the existing SamTrans, BART, and Caltrain routes and Table 3.14-2 shows stops and schedule in the vicinity of the project site.

El Camino Real is an active bus corridor, particularly for regional bus travel. SamTrans' El Camino Real route, from Daly City BART to the Palo Alto Transit Center, is the most frequent route serving the project site. It runs every 15 minutes on weekdays and every 20 minutes on weekends. Other nearby routes provide local service and operate on 30- to 60-minute headways. In addition to regional and regular local service, SamTrans operates four school routes (37, 40, 41, 42) near the project site. Routes offering weekend service include 141, 142, and El Camino Real.

Both Caltrain and BART are currently operating well below pre-pandemic ridership levels, with Caltrain at approximately 39 percent of pre-pandemic ridership and BART at about 42 percent as of FY2024. Additionally, the average load on SamTrans Route ECR near the project site is 20 passengers per bus, compared to a maximum bus capacity of approximately 120 passengers. Therefore, at the current operating frequency of 15-minute headways of Route ECR, there is additional capacity of approximately 400 passengers per hour.



Source: BART 2021

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Figure 3.14-2
BART Station Access Type

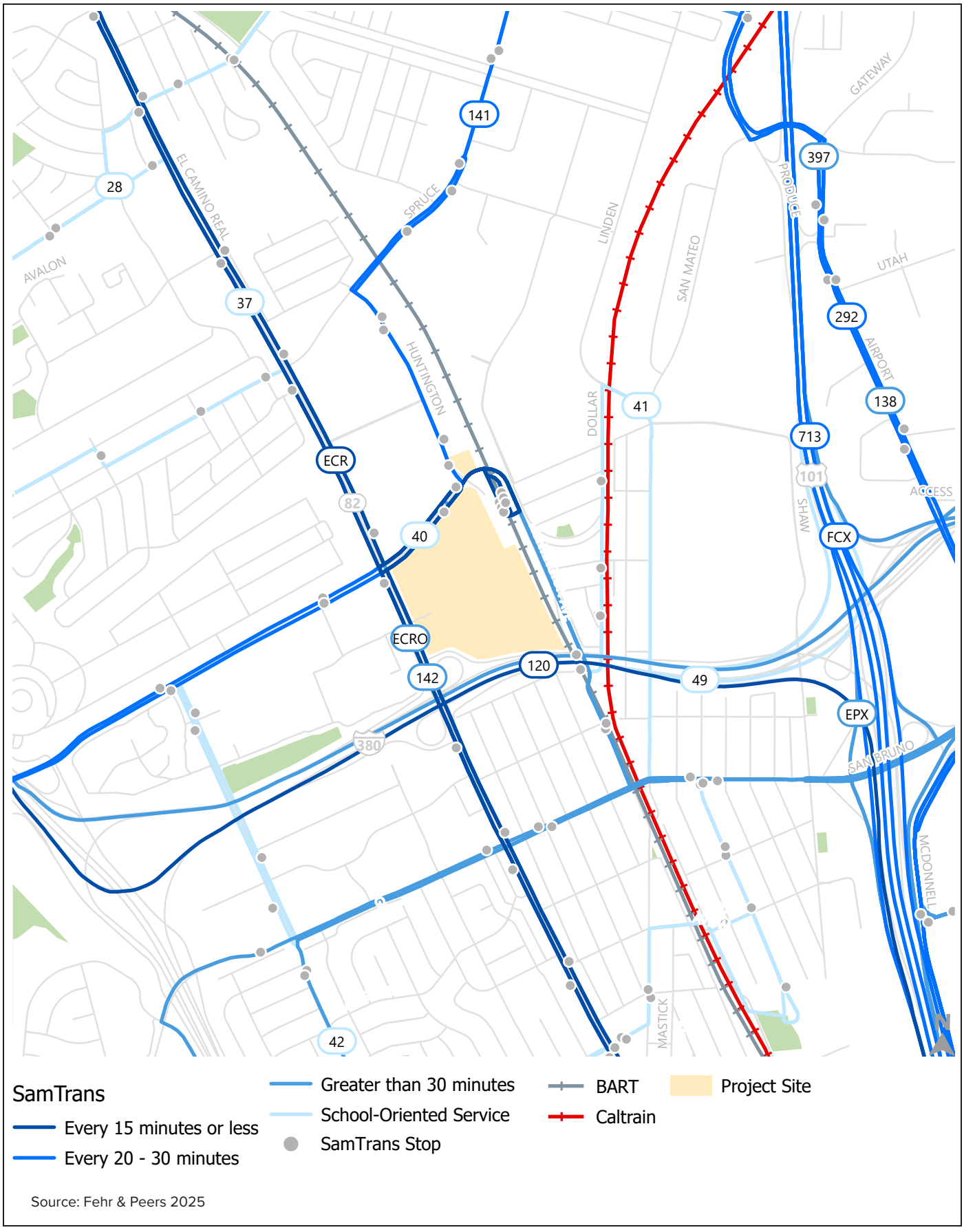

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Figure 3.14-3
Existing Transit Network

Table 3.14-2. SamTrans, Caltrain, and BART Service

			Weekday Operations		Weekend Operations	
Line	**Route**	**Nearest Stop**	**Hours of Operation**	**Frequency**	**Hours of Operation**	**Frequency**
141	Airport/Linden – Skyline College	Sneath Ln & Huntington Ave	5:30 a.m.–10: 45 p.m.	30 minutes	5:30 a.m.–10:45 p.m.	30 minutes
142	SFO – Shelter Creek	Sneath Ln & Huntington Ave	6:00 a.m.–6:20 p.m.	60 minutes	7:00 a.m.–6:20 p.m.	60 minutes
El Camino Real	Daly City BART – Palo Alto Transit Center	El Camino Real & Sneath Ln	4:05 a.m.–1:30 a.m.	15 minutes	4:50 a.m.–2:20 a.m.	15 minutes
El Camino Real Owl	Daly City - SFO	El Camino Real & Sneath Ln	1:15 a.m.–4:40 a.m.	70 minutes	1:15 a.m.–5:15 a.m.	70 minutes
EPX	East Palo Alto - San Bruno BART and San Francisco	San Bruno BART	5:05 a.m.–8:15 p.m.	45 minutes	--	--
37	Hillside/Grove - Alta Loma School	Hazelwood Dr & Northwood Dr	7:40 a.m.–8:25 a.m. 3:25 p.m.–4:05 p.m. (MTThF) 2:00 p.m.–2:40 p.m. (W)	1 bus (school route)	--	--
40	IBL Middle School – San Bruno BART	Sneath Ln & Huntington Ave	7:35 a.m.–8:40 a.m. 3:20 p.m.–4:15 p.m. (MTThF) 1:30 p.m.–3:10 p.m. (W)	1 bus MTThF, 2 buses W (school route)	--	--
41	Parkside IL – San Bruno BART	Huntington Ave East & Herman St	7:40 a.m.–8:05 a.m. 3:10 p.m.–3:30 p.m. (MTThF) 1:15 p.m.–1:35 p.m. (W)	1 bus (school route)	--	--
42	Pacifica – Parkside IL	Sneath Ln & Huntington Ave	7:35 a.m.–8:15 a.m. 3:05 p.m.–3:55 p.m. (MTThF) 1:05 p.m.–1:55 p.m. (W)	1 bus (school route)	--	--
BART Train	Antioch/Richmond – SFO/Millbrae	San Bruno BART	NB: 5:15 a.m.–12:00 a.m. SB: 6:05 a.m.–1:30 a.m.	Approx. 7 minutes	NB: 8:20 a.m.–12:00 a.m. SB: 9:00 a.m.–1:30 a.m.	Approx. 10 minutes
Caltrain	4th & King (SF) – SJ Diridon/Gilroy	San Bruno Caltrain	NB: 5:40 a.m.–11:40 a.m. SB: 5:15 a.m.–12:25 a.m.	Varies from 15–30 minutes	NB: 10:00 a.m.–11:30 p.m. SB: 8:30 a.m.–10:00 p.m.	30 minutes

Project Site

Roadway System

The local circulation system serving the project site and its vicinity is shown on Figure 3.14-1. The following roadways provide local access to the project site.

- **Sneath Lane.** Sneath Lane is a four- to five-lane roadway that defines the northern boundary of the project site with a 30 MPH posted speed limit. Sneath Lane is a major east–west arterial through the City of San Bruno, extending to the City boundary to the west and Huntington Avenue to the east. Sneath Lane provides freeway access to I-280 and SR 35 (Skyline Boulevard). Near the project site, on-street parking is not permitted, and planted medians divide the roadway. A narrow sidewalk extends along both the north and south sides of Sneath Lane. Several designated public bus stops exist along Sneath Lane. In proximity of the project site, there are Class II bicycle lanes on Sneath Lane. One segment spans from Huntington Avenue to Sea Biscuit Avenue. Additionally, there are Class II facilities between El Camino Real and the I-280 on- and off-ramps.
- **Huntington Avenue.** Huntington Avenue is a four-lane roadway with a 30 MPH posted speed limit that defines the eastern boundary of the project site south of the BART station. Huntington Avenue is a major north–south arterial through the City of San Bruno, extending to the City boundary to the north and San Felipe Avenue to the south. Huntington Avenue provides access to both the San Bruno BART and Caltrain stations within the City. Near the project site, on-street parking is not permitted, and planted medians divide the roadway. Several designated public bus stops exist along Huntington Avenue. There are sidewalks on both the eastern and western sides of Huntington Avenue near the project site. Class IV two-way cycle tracks are planned along Huntington Avenue from San Bruno Avenue to Sneath Lane.
- **Tanforan Way/Commodore Drive.** Tanforan Way is a two-lane privately owned roadway that serves as the main entrance to the project site. Tanforan Way is the primary roadway in and out of the project site from and to El Camino Real and provides access to Building 2, Retail, and Flex Zone 2. Tanforan Way serves as part of the connection from SR 82/El Camino Real to Seabiscuit Avenue and B Street. There are sidewalks on both sides of Tanforan Way in the project site.
- **Seabiscuit Avenue.** Seabiscuit Avenue is a two- to three-lane privately owned roadway running through the project site, connecting El Camino Real to the west with Sneath Lane to the north. Sea Biscuit Avenue runs through the Tanforan Shopping Center parking lot. There are sidewalks on portions of the southern and eastern sides of Sea Biscuit Avenue. Sidewalks are available adjacent to the retail uses within the project site as well as leading into the site from the intersection of Sneath Lane and Sea Biscuit Avenue, connecting to the sidewalks on Sneath Lane. No bicycle facilities exist on Sea Biscuit Avenue.

Transit

There are no public transit stops in the project site, but there are multiple public transit stops within a block of the project site, including bidirectional stops on El Camino Real, Huntington Avenue, and Sneath Lane. Additionally, the San Bruno BART station is immediately adjacent to the project site.

Pedestrian Network

Sidewalks are provided on one side of Tanforan Way and partially on Sea Biscuit Avenue in the project site, as well as on both sides of SR 82/El Camino Real, Huntington Avenue, and Sneath Lane. Sidewalks range in width from approximately 6 feet on Sneath Lane to approximately 12 feet on SR 82/El Camino Real. Adjacent to the San Bruno BART station, sidewalks on the southbound side of Huntington Avenue are approximately 20 feet. Other sidewalk widths are somewhere between this minimum and maximum. The southernmost internal street that runs parallel to I-380 and provides access to the parking lots currently does not have any sidewalks. All sidewalks include ramps at intersections and crossings; some have been upgraded with Americans with Disabilities Act-accessible features, such as directional curb ramps and truncated domes. Sidewalk pavement is generally in good condition with minimal obstructions.

Continental crosswalks—parallel lines with crosshatching—are provided for all internal intersections (excluding driveway openings to surface parking lots) throughout the project site. Standard crosswalks are also provided at all major intersections near the site across El Camino Real, Sneath Lane, and Huntington Avenue. However, some intersections are missing standard crosswalks on some legs, including the northern leg of the intersection at Sneath Lane and El Camino Real, the southern leg of the intersection at Tanforan Way and El Camino Real, and the southern leg of the intersection at Huntington Avenue and the Tanforan Parking Garage exit. High-visibility crosswalks are present at the southern leg of the intersection of Sneath Lane and El Camino Real as well as the northern leg of the intersection of Tanforan Way and El Camino Real. Figure 3.14-4 illustrates existing pedestrian facilities and pedestrian facilities proposed under the Walk 'N Bike Plan in the area.

Based on field observations, very low levels of pedestrian activity were observed along the perimeter of the project site on SR 82/El Camino Real, Sneath Lane, and Huntington Avenue. There is pedestrian activity on Huntington Avenue adjacent to the BART station and parking garage, where there is a Route ECR SamTrans stop. When pedestrians crossed to enter the site, it was mainly at the intersections of SR 82/El Camino Real and Sea Biscuit Avenue as well as Sneath Lane and Sea Biscuit Avenue. The pedestrians appeared to be Tanforan Shopping Center customers. Within the project site, most pedestrian traffic is along Sea Biscuit Avenue, which leads into the main shopping center.

The project site slopes slightly downward from west to east along Sneath Lane but likely would not be a deterrent to accessing or navigating the project site. Additionally, SR 82/El Camino Real is an eight- to nine-lane roadway, making it difficult for pedestrians to maneuver and cross. Despite these obstacles, pedestrians were observed crossing SR 82/El Camino Real during the AM period. I-380 and I-280 also present obstacles to entering the site on foot from the south, west, and east.

Figure 3.14-4 shows sidewalk, streetscape, crosswalk, and intersection improvements proposed in the City of San Bruno Walk 'N Bike Plan on streets adjacent to the project site. The Walk 'N Bike Plan proposes streetscape improvements along SR 82/El Camino Real and Huntington Avenue along the east and west borders of the project site. Crossing improvements are recommended at SR 82/El Camino Real and Sneath Lane, Commodore Drive, and I-380 ramps as well as corridor improvements along SR 82/El Camino Real (between Noor Avenue and Princeton Drive) and Huntington Avenue (between San Bruno Avenue and Sneath Lane). Suggested improvements include adding corner bulb-outs and pedestrian refuge islands, which would reduce crossing distance for pedestrians and improve pedestrian visibility at intersections. A further recommendation suggests adding push buttons and RRFBs, which would activate pedestrian crossings at signalized intersections and add flashing lights to alert vehicles to the presence of a

pedestrian. The Walk 'N Bike Plan proposes adding pedestrian-scale lighting, street furniture, public art, and landscaping along SR 82/El Camino Real.

The Walk 'N Bike Plan also proposes changes to the I-380 westbound on-ramps on both sides of SR 82/El Camino Real, on the south end of the project site, including adding high-visibility pedestrian crosswalk markings, RRFBs, yield lines and warning signs, and relocating a curb ramp. Some longer-term changes are also proposed, including realigning the on-ramp to reduce turning speeds, adding right-turn pockets for cars, installing a sidewalk up to the new on-ramp, and installing a sidewalk bulb-out to shorten the pedestrian crossing distance.

Bicycle Network

Bicycle facilities are typically separated into the following four classes.

- **Class I (Bicycle Path).** These facilities are located off-street and can serve both bicyclists and pedestrians.
- **Class II (Bicycle Lanes).** These facilities provide a dedicated area for bicyclists within the paved street width through the use of striping and appropriate signage.
- **Class III (Bicycle Routes).** These facilities are installed along streets that do not provide sufficient width for dedicated Class II bicycle lanes. The street is designated as a bicycle route, where bikes and cars share the road through the use of on-street markings and signage, which inform drivers to expect bicyclists.
- **Class IV (Cycletrack/Protected Bicycle Lanes).** These facilities are for the exclusive use of bicycles and require a vertical element that serves as a barrier separating the bikeway and adjacent vehicular traffic.

Currently, Class II bicycle lanes are provided along Sneath Lane east of Sea Biscuit Avenue, and a small stretch of Commodore Drive, west of the project site. The Walk 'N Bike Plan proposes a Class II lane with a road diet[1] to close the network gap on Sneath Lane between National and Huntington Avenue, a mix of Class II and Class III facilities on Commodore Drive, and a Class IV separated bicycle way along the Huntington Avenue/San Antonio corridor from Sneath Lane to San Mateo Avenue. The City of San Bruno is currently undergoing the Huntington Avenue Pedestrian/Bikeway Safety Project, which will bring the first dedicated Class IV two-way cycle track to the City. These facilities will include concrete barriers and other streetscape improvements to enhance safety for pedestrians and bicyclists along Huntington Avenue. The bicycle infrastructure will extend from San Bruno Avenue to Sneath Lane. All of these facilities would serve as direct routes to the project site. No bicycle facilities are currently in place within the project site. Figure 3.10-5 illustrates the site-adjacent existing facilities, plus proposed bicycle facilities near the project site, as described in Chapter 6 of the City of San Bruno Walk 'N Bike Plan.

[1] A road diet is a roadway reconfiguration which typically involved converting a four-lane, undivided roadway to a three-lane segment consisting of two through lanes and a center, two-way turn lane.

3.14.3 Environmental Impact Analysis

This section describes the environmental impacts of the project on transportation. It describes the thresholds used to determine whether an impact would be significant and the methods used to evaluate the impacts. Measures to mitigate significant impacts are provided, where appropriate.

3.14.3.1 Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, the project would have the potential to have a significant effect on transportation if it would result in any of the following conditions.

a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

b. Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?

c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

d. Result in inadequate emergency access?

3.14.3.2 Methodology and Approach

Travel Demand

Trip Generation

Vehicle trip generation refers to the process of estimating the amount of vehicular traffic that a project would add to the surrounding roadway system. Estimates are created for the peak 1-hour periods during the morning and evening commute periods, when traffic volumes on the adjacent streets are the highest, as well as for daily totals.[2]

Trip-generation estimates do not account for the transportation demand management (TDM) programs proposed for the project. This is because TDM programs are not permanent in the same way as built environment factors and land use diversity, and instead are tied to particular tenants, who often turn over during the life of a project. For this reason, the estimated trips presented in this analysis do not account for TDM strategies and accordingly presents a conservative analysis. To align with county regulations, however, the proposed project would be required to implement a TDM program designed to meet a 25 percent reduction in vehicle trips in accordance with City/County Association of Governments of San Mateo County (C/CAG) requirements for transit-oriented developments.

[2] Trip generation was estimated using a combination of rates from the *Institute of Transportation Engineers Trip Generation Manual (11th Edition)*. The trip generation estimates were further refined through a platform developed by Fehr & Peers known as MainStreet. MainStreet is based upon MXD methodology, developed for and approved by the U.S. Environmental Protection Agency for use in evaluating trip generation at mixed-use projects. The primary difference between the Institute of Transportation Engineers and MXD methodologies is that the traditional Institute of Transportation Engineers methodology relies on one factor—the project's land use type—to predict vehicle trip generation, while MXD incorporates local data and travel behaviors, as well as leading research in how density, mix of land uses, and other built environment factors affect vehicle trip generation. Overall, the MainStreet analysis shows that Institute of Transportation Engineers trip rates, without adjustments for internalization and mode share, would overestimate vehicle trips generated at this site.

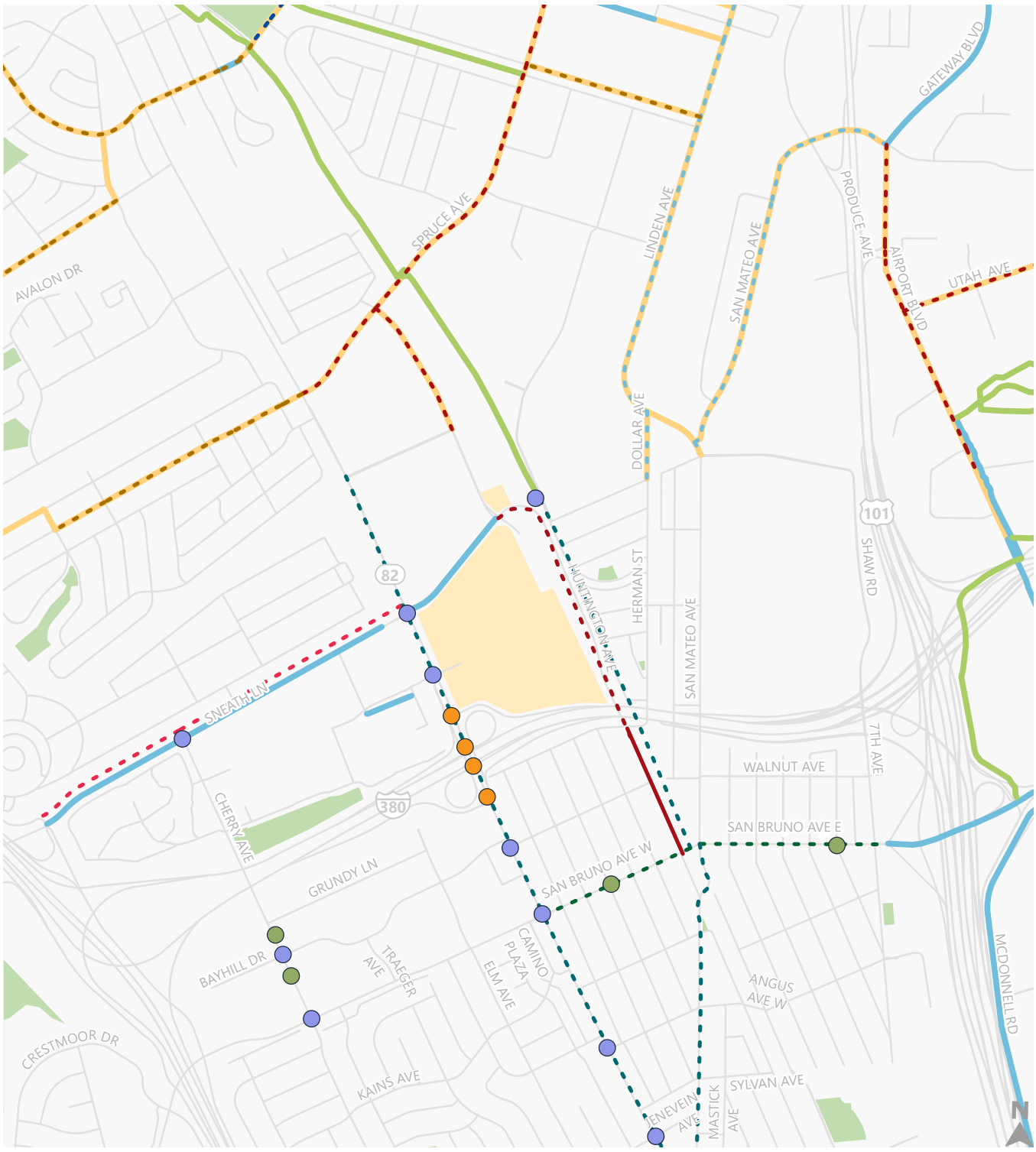

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Figure 3.14-4
Existing and Proposed Bicycle Network

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Figure 3.14-5
Walk 'n Bike Plan

The trip generation forecasts do account for internalization and the use of transit, walking, and biking that might occur without TDM programs given the surrounding land use and transportation context. Without TDM programs in place, 11 to 12 percent of daily project trips and somewhere between 10 and 13 percent of peak-hour trips are expected to be completed by walking, biking, or transit. Another 7 to 9 percent of daily trips would be accomplished internal to the site.

Existing trips were calculated using the *ITE Trip Generation Manual* (11th Edition) and validated using driveway counts collected at the gateways to the project site in 2023. The trip generation estimates for the project do not subtract trips associated with the existing mall given that the project would retain some of the most active current uses (i.e., the Century at Tanforan Theater and Target) and it is not possible to parse out trips specific to these uses. Therefore, these estimates are conservative.

Table 3.14-3 summarizes the daily, weekday AM peak-hour, and weekday PM peak-hour vehicle trip generation for each buildout scenario. Typically, the AM peak hour falls within the AM peak period of 7:00 a.m. to 9:00 a.m. The PM peak hour typically falls within the PM peak period of 4:00 p.m. to 6:00 p.m.

Table 3.14-3. Vehicle Trip Generation by Buildout Scenario

		AM Peak Hour			PM Peak Hour		
Scenario	**Daily**	**Total**	**In**	**Out**	**Total**	**In**	**Out**
Scenario A (R&D Scenario)	37,590	**2,380**	**1,700**	680	3,310	1,370	**1,940**
Scenario B (Residential Scenario)	**41,800**	2,170	1,390	**780**	**3,490**	**1,650**	1,840

Source: ITE Trip Generation Manual 11th Edition and Fehr & Peers MainStreet with MXD+
Notes: **Bold** text = highest trip-generating scenario.

As shown in Table 3.14-3, Scenario A is expected to generate more AM and fewer PM peak-hour trips than Scenario B. Scenario B is expected to generate more daily trips than Scenario A. Peak-hour trip generation is less than the total number of employees, residents, and visitors expected with the project due to internalization of trips; some portion of trips being completed by walk, bike, and transit; and the fact that not all employees travel to the office everyday (e.g., due to sick leave, vacation, offsite meetings, work from home). Additionally, many trips are completed outside of the peak hour windows shown above.

Table 3.14-4 summarizes the daily, weekday AM peak-hour, and weekday PM peak-hour transit trip generation for each buildout scenario. As stated in the Regional Setting section, the additional transit trips generated by the Tanforan development can be accommodated within existing transit capacity.

Table 3.14-4. Transit Trip Generation by Buildout Scenario

	Daily	AM Peak Hour	PM Peak Hour
Scenario A (R&D Scenario)	2,270	159	211
Scenario B (Residential Scenario)	2,649	151	232

Trip Distribution and Assignment

Vehicle trips were distributed based on travel patterns for similar land uses in adjacent neighborhoods as observed in the C/CAG-VTA Travel Model (VTA 2025). Table 3.14-5 shows the percent of trips using each of the primary gateways.

Table 3.14-5. Percent of Project Vehicle Trip Distribution

Gateways	R&D	Residential	Retail
US-101	42%	22%	2%
I-280	41%	32%	10%
El Camino Real	8%	26%	50%
Other Local Roads	9%	20%	38%

Source: VTA 2025.

The C/CAG-VTA travel demand model and shortest-travel time calculations in Google Maps were used to determine assignment of trips to the local roadway network. The estimated project trips were layered on top of the baseline volumes to estimate total roadway volumes once the project is built out.

Vehicle Miles Traveled Analysis

SB 743 and the resulting CEQA Guidelines update completed through 2020 replaced the use of LOS for determining transportation impacts with an evaluation of VMT. This EIR incorporates this change and uses VMT findings to make impact determinations later in this document.

The VMT significance threshold and methodology used in this EIR is based on the OPR *Technical Advisory on Evaluating Transportation Impacts in CEQA* (December 2018). OPR suggests screening criteria that can be used for transit-oriented projects such as this one. CEQA Guideline Section 15064.3, subdivision (b)(1), states that lead agencies generally should presume that certain projects (including residential, retail, and office projects, as well as projects that are a mix of these uses) proposed within 0.5 mile of an existing major transit stop or an existing stop along a high-quality transit corridor will have a less-than-significant impact on VMT. The less-than-significant presumption, however, would not be appropriate if the project:

- Has a floor area ratio (FAR) of less than 0.75.
- Includes more parking for use by residents, customers, or employees of the project than required by the jurisdiction (if the jurisdiction requires the project to supply parking).
- Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the lead agency, with input from the MPO).

If a project does not meet screening criteria, thresholds can be set for individual land use types. See *VMT Analysis Results* in Section 3.14.3.3, *Buildout Scenarios Evaluated*, for project-specific results.

Freeway Intersection Queue Analysis

Although intersection operation is not used as an impact criterion in this analysis, queue analysis was performed to evaluate the possibility of hazardous operations at freeway off-ramp termini intersections near the project site because of project conditions. The queue analysis was completed for the Baseline, Baseline Plus Project, Cumulative, and Cumulative Plus Project conditions at the following off-ramp intersections.

1. I-280 southbound ramps/Sneath Lane
2. I-280 northbound ramps/Sneath Lane
3. US-101 southbound ramps/San Bruno Avenue

4. US-101 northbound ramps/San Bruno Avenue
5. I-380 eastbound/El Camino Real
6. I-380 westbound/El Camino Real

This analysis is in keeping with San Bruno General Plan Policy T-6, "Provide for efficient, safe, and pleasant movement for all transportation modes," and is used in impact determinations later in the document.

Queue Methodology

Highway Capacity Manual 7th Edition (HCM 7th) Methodology was used to evaluate the project's impact on queue lengths at off-ramp termini intersections to understand if the project would cause substantial queueing that would extend beyond the available ramp storage length. The project's impact was evaluated using 50th percentile queues. The 50th percentile queue represents a queue length that has a 50 percent probability of being exceeded during the analysis time period. Therefore, the 50th percentile represents a more conservative queue length, greater than typical or average conditions.

Where 50th percentile queue lengths were shown to exceed available storage capacity, microsimulation tool SimTraffic was used to analyze the 95th percentile queue to a greater degree of accuracy.

Freeway Ramp Queue Significance Thresholds

The City of San Bruno does not include significance criteria related to ramp termini intersection queues. For the purpose of this analysis, the project would result in a "dangerous condition" and a significant impact if the addition of the project would extend the line of traffic exiting the freeway beyond the available storage capacity of the off-ramp under the 50th percentile queue, such that it would spill back onto the mainline freeway and cause a hazardous condition. If the No Project scenario results in a queue length beyond the available storage length, the project would result in a significant impact if it extends the queue by any additional length.

3.14.3.3 Buildout Scenario Evaluated

As discussed in Section 3.0.3.1, *Buildout Scenarios*, for each resource area studied, the EIR evaluates the scenario with the greatest potential to result in a significant impact. In some cases, impacts would be the same regardless of the buildout scenario, so the analysis does not evaluate a specific buildout scenario. This approach ensures that the EIR identifies the maximum potential impacts of the project based on reasonably foreseeable development outcomes. Table 3.14-6 defines the analysis scenarios considered in the transportation analysis.

Table 3.14-6. Transportation Analysis Scenarios

Scenario	Description
Baseline Conditions	• Existing travel patterns obtained from the San Mateo City/County Association of Governments Travel Demand Model. • Existing transportation network conditions obtained from site observations, including records of vehicle counts, roadway and sidewalk conditions, and intersection operations. Data collection occurred in 2023 and 2024. • Existing Conditions adjusted by adding the new Southline roadway under construction at the time of the analysis connecting Huntington Avenue in San Bruno with South Linden Avenue in South San Francisco. • Existing traffic volumes adjusted by adding vehicle volumes anticipated in conjunction with the opening of two projects currently under construction: Southline Phase I and Bayhill Specific Plan Phase I. • Non-auto transportation demand for the two baseline projects was qualitatively added to the understanding of multimodal network operations.
Existing Plus Project Conditions	Project-generated transportation network impacts overlaid on Baseline Conditions. Two different buildout scenarios were evaluated for the transportation impacts analysis: • Scenario A is expected to generate more AM peak hour trips. • Scenario B is expected to generate more daily trips and PM peak hours trips.
Cumulative Conditions	Year 2040 travel patterns and roadway volumes obtained from the San Mateo City/County Association of Governments Travel Demand Model. The growth in roadway volumes between the base year and the 2040 model year was calculated and added to the observed roadway volumes collected as part of Existing Conditions analysis.

VMT Analysis Results

The VMT analysis was prepared using the methodology and approach described in the *Methodology and Approach* section. The project is consistent with the OPR screening criteria described in the *Methodology and Approach* section. The project site lies between a major transit stop (San Bruno BART) and a high-quality transit corridor (Route ECR qualifies because it operates at 15-minute headways all day, every day). Furthermore, the project passes all additional screening checks; it has a proposed FAR of more than 0.75, it supplies parking below San Bruno code requirements, and it is consistent with *Plan Bay Area 2050* (ABAG and MTC 2021) (the regional Sustainable Communities Strategy). The Max R&D Scenario (Scenario A) has a sitewide FAR of 1.68 and provides 6,221 parking stalls while the Municipal Parking Code would allow for approximately 8,900 stalls. The Max Residential Scenario (Scenario B) has a sitewide FAR of 1.77 and provides 5,864 parking stalls while the Municipal Parking Code would allow for approximately 8,100 stalls.

Freeway Queue Analysis Results

Freeway queues at off-ramp termini intersections were evaluated to assess if the addition of the project would result in a queue that exceeds the available storage length. Table 3.14-7 describes baseline queue analysis results.

Table 3.14-7. Baseline Conditions: 50th Percentile Maximum Queue Lengths (feet)

Intersection	Off-Ramp Movement [a]	Storage Capacity	Baseline Conditions (No Project)	Baseline Conditions + Project
AM Peak Hour				
I-280 SB Ramps/ Sneath Lane/Rollingwood	NBT/L	800	25	30
	NBR	800	0	0
I-280 NB Ramps/ Sneath Lane/Driveway	NBL	650	25	50
	NBT	650	0	0
	NBR	650	30	110
US-101 SB Ramps/ San Bruno Avenue	SBL	950	45	45
	SBT/L	950	0	0
	SBR	950	525	690
US-101 NB Ramps/ San Bruno Avenue	NBT/L	1,750	1,655	**1,995**
	NBR	1,800	0	0
	SBL	1,150	95	95
	SBR	1,150	0	0
I-380 EB Ramps/ El Camino Real	EBL	1770	80	160
	EBR	1,770	90	90
I-380 WB Ramps/ El Camino Real	WBL	1,340	200	200
	WBR	1,340	800	1,055
PM Peak Hour				
I-280 SB Ramps/ Sneath Lane/Rollingwood	NBT/L	800	50	60
	NBR	800	0	0
I-280 NB Ramps/ Sneath Lane/Driveway	NBL	650	50	110
	NBT	650	0	0
	NBR	650	40	150
US-101 SB Ramps/ San Bruno Avenue	SBL	950	30	30
	SBT/L	950	0	0
	SBR	950	**1,535**	**1,715**
US-101 NB Ramps/ San Bruno Avenue	NBT/L	1,750	1,305	1,645
	NBR	1,800	0	0
	SBL	1,150	80	80
	SBR	1,150	0	0
I-380 EB Ramps/ El Camino Real	EBL	1770	120	280
	EBR	1,770	230	280
I-380 WB Ramps/ El Camino Real	WBL	1,340	175	175
	WBR	1,340	1,245	**1,510**

Source: Appendix 3.14-1, *Transportation Analysis Summary*.

[a] Off-ramp movement refers to the direction of the off-ramp approach at each intersection and turn lane. NB = northbound; SB = southbound, EB = eastbound, WB = westbound. L = left; T = through; R = right.

At three approaches, the 50th percentile queue length exceeds the available storage capacity. The intersections of US-101 SB Ramps/San Bruno Avenue, US-101 NB Ramps/San Bruno Avenue, and I-380 WB Ramps/El Camino Real resulted in 50th percentile queueing lengths that extend beyond the available storage length. These results were generated using HCM 7th Edition methodology and using an assumed vehicle occupancy length of 25 feet. This method provides a more conservative estimate than other models but does not account for individual vehicle movements, lane-changing behavior, or congestion interactions, which are better captured through microsimulation. To gain a more precise understanding of future queue lengths at these intersections, SimTraffic was used for microsimulation modeling, with the resulting analysis presented in Table 3.14-8.

Table 3.14-8. Baseline Conditions: Microsimulation 95th Percentile Maximum Queue [a] Lengths (feet)

Intersection	Off-Ramp Movement [b]	Storage Capacity [c]	Baseline Conditions (No Project)	Baseline Conditions + Project
AM Peak Hour				
US-101 NB Ramps/ San Bruno Avenue	NBT/L	1,750	935	1,275
	NBR	1,800	0	0
PM Peak Hour				
US-101 SB Ramps/ San Bruno Avenue	SBL	950	90	105
	SBT/L	950	0	0
	SBR	950	445	365
I-380 WB Ramps/ El Camino Real	WBL	1,340	675	825
	WBR	1,340	320	950

Source: Appendix 3.14-1, *Transportation Analysis Summary*

[a] The 95th percentile maximum queue represents the maximum back of queue with 50th percentile traffic volumes.

[b] Off-ramp movement refers to the direction of the off-ramp approach at each intersection and turn lane. NB = northbound; SB = southbound, EB = eastbound, WB = westbound. L = left; T = through; R = right.

[c] The length reported in parentheses reflects the movement's pocket length; however, the actual available storage length is the number outside parentheses.

When analyzing the 95th percentile queueing in microsimulation software SimTraffic, the queue lengths at all three intersections in both the baseline and baseline plus project scenarios are found to be less than the storage capacity. This result shows that project volumes will not cause queues to spill back onto freeway mainlines.

Cumulative Conditions

Cumulative conditions represent projected traffic volumes for the year 2040, reflecting regional growth assumptions rather than the specific impacts of individual development projects. Link level volumes for 2040 were obtained from the regional traffic model provided by the City and County Association of Governments of San Mateo. These volumes were converted into turning movement volumes necessary for queueing analysis at freeway off-ramps using the Furness Method (also known as the Fratar Method). This technique iteratively scales future turning movements to conform first to observed existing volumes on each inbound link and then to projected future volumes on each outbound link, producing estimated 2040 turning movement volumes that maintain the ratios observed in existing counts. Both cumulative scenarios have higher intersection approach volumes than the baseline scenarios. Since the Furness Method uses existing turning

movement ratios to distribute future link volumes into individual turning movements, and existing turning movements are more evenly distributed than baseline scenario movements, certain cumulative turning movements are lower than in the baseline scenario and result in a shorter queue. Table 3.14-9 summarizes the queueing analysis results for both cumulative and cumulative-plus-project scenarios.

Table 3.14-9. Cumulative Conditions: 50th Percentile Maximum Queue Lengths (feet)

Intersection	Off-Ramp Movement [a]	Storage Capacity	Cumulative Conditions (No Project)	Cumulative Conditions + Project
AM Peak Hour				
I-280 SB Ramps/ Sneath Lane/Rollingwood	NBT/L	800	35	65
	NBR	800	0	0
I-280 NB Ramps/ Sneath Lane/Driveway	NBL	650	35	60
	NBT	650	0	0
	NBR	650	30	125
US-101 SB Ramps/ San Bruno Avenue	SBL	950	200	185
	SBT/L	950	0	0
	SBR	950	285	600
US-101 NB Ramps/ San Bruno Avenue	NBT/L	1,750	1,235	1,760
	NBR	1,800	0	0
	SBL	1,150	95	95
	SBR	1,150	0	0
I-380 EB Ramps/ El Camino Real	EBL	1770	60	410
	EBR	1,770	485	950
I-380 WB Ramps/ El Camino Real	WBL	1,340	325	325
	WBR	1,340	1,000	**1,475** [b]
PM Peak Hour				
I-280 SB Ramps/ Sneath Lane/Rollingwood	NBT/L	800	55	65
	NBR	800	0	0
I-280 NB Ramps/ Sneath Lane/Driveway	NBL	650	60	135
	NBT	650	0	0
	NBR	650	50	200
US-101 SB Ramps/ San Bruno Avenue	SBL	950	155	155
	SBT/L	950	0	0
	SBR	950	640	810
US-101 NB Ramps/ San Bruno Avenue	NBT/L	1,750	1275	1615
	NBR	1,800	0	0
	SBL	1,150	85	85
	SBR	1,150	0	0

Intersection	Off-Ramp Movement [a]	Storage Capacity	Cumulative Conditions (No Project)	Cumulative Conditions + Project
I-380 EB Ramps/ El Camino Real	EBL	1770	140	555
	EBR	1,770	235	460
I-380 WB Ramps/ El Camino Real	WBL	1,340	220	220
	WBR	1,340	1,110	**1,375** [b]

Source: Appendix 3.14-1, *Transportation Analysis Summary*

[a] Off-ramp movement refers to the direction of the off-ramp approach at each intersection and turn lane. NB = northbound; SB = southbound, EB = eastbound, WB = westbound. L = left; T = through; R = right.

[b] Queue length is greater than storage capacity, but less than the queue length analyzed in a microsimulation for the same approach in Baseline Scenario.

At one approach the 50th percentile queue length was measured to be longer than available storage capacity, at the intersection of I-380 WB Ramps/El Camino Real. However, this queue length is shorter than what was recorded in the baseline scenario at the same location, where microsimulation analysis was completed in the Baseline scenario for this approach. As found previously and shown in Table 3.14-8, the intersection of I-380 WB Ramps/El Camino Real is not projected to have a queue longer than the available storage.

Table 3.14-10 summarizes the approach used for each impact analysis related to transportation.

Table 3.14-10. Impact Analysis Approach for Transportation

Impact Criteria	Scenario A	Scenario B	EIR Approach
Impact TRA-1: Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	Scenario A has more life-science laboratory and office and more amenity use.	Scenario B has more residential and hotel use.	Same for both scenarios. The project footprint and the proposed changes to public roadways are the primary factors evaluated for this impact. The project area and suggested changes to public roadways are the same under both scenarios; therefore, the analysis approach is not based on one scenario or the other, and accounts for any future development that could occur under the project.
Impact TRA-2: Conflict or be inconsistent with State CEQA Guidelines section 15064.3, subdivision (b)?	Scenario A has more life-science laboratory and office and more amenity use.	Scenario B has more residential and hotel use.	Same for both scenarios. The project footprint, the presence or absence of transit service, and the project's general characteristics (e.g., parking supply, mixed-use program, and FAR) dictate the impact on VMT. The project location, existing conditions, and general project characteristics are the same under both scenarios; therefore, the analysis approach is not based on one scenario or the other, and accounts for any future development that could occur under the project.

Impact Criteria	Scenario A	Scenario B	EIR Approach
Impact TRA-3: Substantially increase hazards because of a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Scenario A has more life science laboratory and office and more amenity use.	Scenario B has more residential and hotel use.	Both scenarios. Both scenarios have similar design features and uses; therefore, the approach for evaluating incompatible uses and physical design features is the same. Vehicle volumes would be greater under Scenario A in the morning and greater under Scenario B in the afternoon. Both scenarios would increase traffic volumes above what is present on the surrounding roadways today as well as concentrate volumes differently. Therefore, the hazards analysis evaluates the AM peak using Scenario A and the PM peak using Scenario B.
Impact TRA-4: Result in inadequate emergency access?	Scenario A has more life-science laboratory and office and more amenity use.	Scenario B has more residential and hotel use.	See above explanation for TRA-3.

3.14.3.4 Impacts and Mitigation Measures

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

The project would result in a significant impact related to the roadway circulation system if it would conflict with the intent of an existing program, plan, ordinance, or policy applicable to the project site. This impact analyzes the project's impact relative to planned growth on its own. The project's contribution to potential cumulative impacts related to growth is assessed separately in Chapter 5, *Other CEQA Considerations*.

The Initial Study/Mitigated Negative Declaration (IS/MND) for the 2023–2031 Housing Element Update includes a mitigation measure (MM TRN-1.1) to prepare a Transportation Analysis prior to the issuance of any discretionary permits for a housing opportunity site. This EIR document serves as a Transportation Analysis for the project, which, as discussed in Section 3.0.6, *Information Incorporated by Reference*, was evaluated as Housing Opportunity Site #14 in the IS/MND and included as Housing Opportunity Site #20 in the adopted Housing Element.

The project would increase vehicle traffic on roadway facilities in the vicinity of the project site. The *San Bruno General Plan* and the San Mateo C/CAG CMP establish LOS standards. Under Baseline Plus Project conditions, some study intersections would exceed the acceptable LOS thresholds established by the *San Bruno General Plan*. Per CEQA Guidelines Section 15064.3 (b) and CEQA Statute Section 21099(b)(2), LOS is not used as CEQA impact criteria in this EIR but is still being used for planning purposes. An intersection LOS and delay assessment was completed as a planning exercise for the project but, for the reason cited above, the results are not evaluated in this EIR and policies relating to LOS are not considered as policies tied to physical impacts on the environment. Summary results are included in Appendix 3.14-2 for informational purposes only.

The project would not interfere with existing or planned transit service. It is anticipated that it would increase demand for transit services in the vicinity of the project. Table 3.14-4 details the transit trips that would be generated by the project by buildout scenario, which can be accommodated by the existing available capacity on SamTrans Route ECR, Caltrain, and BART. Existing capacity is detailed in the Transit section of the Environmental Setting. While none are described as part of the project description, any construction-phase or buildout phase changes to existing transit stops or routes along El Camino Real or in the Huntington Avenue pullout would be made in consultation with the City and SamTrans such that redesigned transit stops would align with agency and City goals and standards.

There are several bicycle and pedestrian facilities in the project vicinity, and several planned as part of the project. The project would increase the demand for bicycle and pedestrian facilities in the vicinity of the project site. As described in Section 3.14.2.1, *Regulatory Setting*, the City adopted the Walk 'N Bike Plan to facilitate increased bicycling and walking to local destinations in San Bruno. There is nothing in the project description that would interfere with implementation of the facilities proposed in the Walk 'N Bike Plan at a future date. The project includes improved bicycle and pedestrian crossings on Huntington Avenue, Sneath Lane, and El Camino Real; the construction of a protected cycle track on Sneath Lane; and a modest road diet on Sneath Lane to enhance comfort for people walking and biking. Moreover, the facilities proposed on the project's internal street network would complement the improvements envisioned in the Walk 'N Bike Plan, and help fulfill the goals laid out in the Plan's policy framework.

The project is consistent with the goals of Plan Bay Area 2050 and the San Bruno General Plan, both of which promote compact, transit-oriented development. The project's location near the San Bruno BART and Caltrain stations aligns with these broader regional mobility goals. The project supports key objectives identified in several transit planning efforts include the SamTrans Short Range Transit Plan (SRTP), El Camino Real Bus Speed and Reliability Study, and the San Bruno Transit Corridors Specific Plan. Because the development increases density adjacent to transit services and provides less than the allowable parking, the project encourages transit use. The project also complements the BART Walk and Bicycle Network Gap Study and the San Mateo County Comprehensive Bicycle and Pedestrian Plan by improving the pedestrian landscape adjacent to and within the project site. The project would not conflict with the San Bruno Local Roadway Safety Plan (LRSP), which aims to improve roadway safety for all users. The project's emphasis on more pedestrian-friendly design and enhanced crossings aligns with the safety strategies identified in the LRSP.

The project would not interfere with existing or planned San Bruno, county, or state transportation plans. It would not conflict with currently adopted goals or policies (Section 3.14.2.1, *Regulatory Setting*), and the project's street network changes are in keeping with existing plans and policies. Therefore, the project's impact on the circulation system would be ***less than significant***. No mitigation measures are required.

Impact TRA-2: The project would not conflict or be inconsistent with State CEQA Guidelines section 15064.3, subdivision (b) (Less Than Significant).

The project would result in a significant impact related to CEQA Guidelines Section 15064.3, subdivision (b) if it would lead to VMT estimates inconsistent with the approach outlined in CEQA Guidelines Section 15064.3, subdivision (b). CEQA Guideline Section 15064.3, subdivision (b)(1), states that lead agencies generally should presume that certain projects (including residential, retail,

and office projects, as well as projects that are a mix of these uses) proposed within 0.5 mile of an existing major transit stop or an existing stop along a high-quality transit corridor will have a less-than-significant impact on VMT. The project site lies between a major transit stop (San Bruno BART) and a high-quality transit corridor (Route ECR qualifies because it operates at 15-minute headways all day, every day). Furthermore, as discussed above in the VMT Results section, the project passes all additional screening checks; it has a proposed FAR of more than 0.75, it would supply parking below San Bruno code requirements, and it is consistent with *Plan Bay Area 2050* (ABAG and MTC 2021) (the regional Sustainable Communities Strategy). The Max R&D Scenario (Scenario A) has a sitewide FAR of 1.68 and provides 6,221 parking stalls while the Municipal Parking Code would allow for approximately 8,900 stalls. The Max Residential Scenario (Scenario B) has a sitewide FAR of 1.77 and provides 5,864 parking stalls while the Municipal Parking Code would allow for approximately 8,100 stalls. The project is consistent with the intent of SB 743 in that it promotes long-term sustainability based on denser infill development, reduced reliance on individual vehicles and improved mass transit, all with the goal of reducing GHG emissions. The project is expected to produce trip making patterns that blend those of denser urban environments and those of lower density suburbs, which represents a considerable improvement over the trip patterns associated with the current low-density, single use shopping complex on-site today. Therefore, the project's impact on VMT would be ***less than significant***. No mitigation measures are required.

Impact TRA-3: The project would not substantially increase hazards because of a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment) (Less Than Significant).

The project would result in a significant impact related to hazardous design if the design of the project or incompatible uses would lead to potentially dangerous interactions between vehicles and other modes or bicycles and other modes. As discussed above under Section 3.14.3.3, *Buildout Scenario Evaluated*, the AM peak hour is considered for Scenario A and the PM peak hour is considered for Scenario B because they each respectively generate the greatest number of peak-hour trips.

The project would be required to undergo review by City departments, including a review of ground-floor/street-level operations so that loading operations and vehicle access are adequately accommodated without obstructing, hindering, or impairing drivers' reasonable and safe views of other vehicles, people walking, or people bicycling on the same street and/or restricting the ability of a driver to stop a motor vehicle without danger of an ensuing collision. Project design elements need to be consistent with City standards and Walk 'N Bike Plan policies, both of which focus on eliminating existing hazards and designing the transportation network to enhance safety of all modes of travel. Although the project would add vehicle trips to the surrounding roadways, this general increase in vehicular traffic volumes would be distributed among multiple streets and would not itself be considered a traffic hazard.

The project street network improvements were developed in consultation with various City departments to enhance safe travel for people bicycling and people walking around the project site. The proposed street network improvements are presented in Chapter 2, *Project Description*, and include vehicle access improvements like signalization and geometry changes at the most important gateways, pedestrian sidewalk, crosswalk, and lighting improvements, and new internal bicycle facilities and may include the conversion of the Sneath Lane bicycle lane to a protected two-way cycle track the full length of the project site. None of these are types of projects that would result in

driving hazards and many are design elements that will protect against potential hazards that could be introduced in busy multimodal environments.

Additionally, a queue analysis was performed at freeway off-ramp termini intersections to evaluate if the project would result in a queue spillback that would affect the mainline freeways. The addition of the project would increase queue lengths on freeway off-ramps near the project site. However, as shown in Table 3.14-8, the addition of the project would not result in a queue length beyond the available ramp storage capacity. Therefore, the addition of the project would not result in substantial queueing at freeway ramp termini intersections or an impact on the mainline freeway.

Therefore, for the reasons described above, the project would not create potentially hazardous conditions, and impacts related to design hazards would be ***less than significant***. No mitigation measures are required.

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

The project would result in a significant impact related to emergency access if it would impair, hinder, or preclude adequate emergency access. As discussed above under Section 3.14.3.3, *Buildout Scenario Evaluated*, the AM peak hour is considered for Scenario A and the PM peak hour is considered for Scenario B because they each respectively generate the greatest number of peak-hour trips.

The existing roadway network enables emergency vehicle access to all buildings at the project site. The San Bruno Police Department, next to the San Bruno BART station, is in the same mega block as the project site. Three fire stations are located nearby: San Bruno Central Fire Station at 555 El Camino Real is approximately 1 mile, or a 5-minute drive, from the center of the project site; San Bruno Station 52 at 1999 Earl Avenue approximately 2 miles, or a 7-minute drive, from the center of the project site; and South San Francisco Station 62 at 249 Harbor Way is approximately 2.5 miles, or a 8-minute drive, from the center of the project site. With the completion of the Southline Phase I project and the new roadway connecting Huntington Avenue and South Linden Avenue (both are part of the Baseline Conditions), response times from Station 62 to the project site could decrease by up to 1 minute.

With implementation of the project, emergency access routes would remain the same as existing conditions. Internal streets would be designed in accordance with City standards, which include provisions that address emergency access, and would be required to undergo multi-departmental City review so that proposed vehicle access and streetscape improvements do not impede emergency access to buildings with the project site. In general, the proposed street network changes would not introduce unusual design features that would substantially change, hinder, or preclude existing emergency access.

The addition of project vehicle trips to the surrounding network does not produce any hazardous queues, and thus project trips are not expected to result in delay to emergency vehicles.

Therefore, for the reasons described above, the project would not result in inadequate emergency access, and emergency access impacts would be ***less than significant***. No mitigation measures are required.

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3.15 Tribal Cultural Resources

3.15.1 Introduction

This section evaluates the potential impacts on Tribal cultural resources that could result from construction and operation of the Tanforan Redevelopment Project (project). This section also describes existing conditions at the project site as well as the regulatory framework for this analysis. Impacts resulting from implementation of the project, and feasible mitigation measures, where applicable, are described.

No questions or concerns related to Tribal cultural resources were raised in the Notice of Preparation (NOP) (Appendix 1-1, *Notice of Preparation and Comments Received on the Notice of Preparation*). The Native American Heritage Commission (NAHC) submitted a comment letter confirming its receipt of the NOP and summarizing general requirements for cultural resource analysis under the California Environmental Quality Act (CEQA). The letter did not raise specific questions or concerns related to the scope of the Draft EIR analysis. The letter is included in Appendix 3.15-1, *Tribal Outreach Materials*.

3.15.2 Existing Conditions

3.15.2.1 Regulatory Setting

This section summarizes regulations and policies that are relevant to the analysis of the project's potential impacts on Tribal cultural resources.

State

California Environmental Quality Act and Assembly Bill 52

Analysis of Tribal cultural resources was identified as a distinct CEQA environmental category with the adoption of Assembly Bill 52 (AB 52) (Public Resources Code [PRC] Section 21074). AB 52 sets up an expanded consultation process, following PRC Section 21080.3.1(b). CEQA requires public agencies to consider the impacts of their actions on Tribal cultural resources.

CEQA defines a *tribal cultural resource* as any one of the following (PRC Section 21074).

> Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either (1) included in or eligible for inclusion in the California Register of Historical Resources or (2) included in a local register of historical resources;
>
> 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 Section 5024.1. The lead agency shall consider the significance of the resource to a California Native American tribe; or
>
> A cultural landscape that meets the requirements listed above and is geographically defined in size and scope.

Archaeological sites, including those that qualify as historical resources (PRC Section 21084.1), unique archaeological resources (PRC Section 21083.2[g]), and nonunique archaeological resources (PRC Section 21083.2[h]), may qualify as Tribal cultural resources.

PRC Section 21080.3.1 requires that local agencies formally consult with recognized California Native American Tribes during the CEQA process to discuss potential impacts on Tribal cultural resources. Prior to the release of a negative declaration, mitigated negative declaration, or EIR, the agency must initiate consultation with Tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if "(1) a tribe requested of the agency, in writing, to be informed through formal notification of proposed projects in the geographic area that is traditionally and culturally affiliated with the tribe, and (2) a tribe responds, in writing, within 30 days of receipt of the formal notification of a proposed project and requests consultation with the agency" (PRC Section 21080.3.1[b]).

PRC Section 21084.2 states that a "project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant impact on the environment." To assist in determining whether a project may have an impact on a Tribal cultural resource, a CEQA lead agency is required to consult with any California Native American Tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project.

The Office of Planning and Research's *Tribal Consultation Guidelines* define *consultation* as "a process in which both the Tribe and local government invest time and effort into seeking a mutually agreeable resolution for the purpose of preserving or mitigating impacts to a cultural place, where feasible." (Office of Planning and Research 2005) Consultation is concluded when the agency and Tribe(s) agree to measures to mitigate or avoid significant effects on a Tribal cultural resource or if either party concludes that mutual agreement cannot be reached after a good-faith and reasonable effort (PRC Section 21080.3.2[b]).

Senate Bill 18

California Senate Bill 18 (SB 18), established in September 2004, requires local governments to consult with California Native American Tribes prior to preparing or amending either general plans (as defined in California Government Code Section 65300 et seq.) or specific plans (as defined in Government Code Section 65450 et seq.). The purpose of this consultation is to include California Native American Tribes early in the planning process to allow for the identification and protection of cultural resources. This process also allows cultural resources to be considered during the broad-scale local and regional planning process rather than at a project level.

The following list outlines the responsibilities of local government in sequential order.

1. Local governments must notify appropriate Tribes, as identified by the NAHC, prior to the adoption or amendment of a general plan or specific plan.
2. Tribes have 90 days from the receipt of notification to request consultation (Government Code Section 65352.3).
3. Prior to the adoption or substantial amendment of a general plan or specific plan, local governments must refer the proposed action to the appropriate Tribes, as identified by the NAHC, regardless of whether previous consultation has taken place.
4. Local governments must allow a 45-day comment period (Government Code Section 65352).
5. Local governments must provide notice of a public hearing to all Tribes that filed a written request for such notice at least 10 days prior to the hearing (Government Code Section 65092).

Health and Safety Code Section 7050.5: Human Remains

Section 7050.5 of the California Health and Safety Code states that, in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the remains are discovered has determined whether the remains are subject to the coroner's authority. If the human remains are of Native American origin, the coroner must notify the NAHC within 24 hours of this identification.

Public Resources Code Section 5097.98: Notification of Most Likely Descendant

PRC Section 5097.98 states that the NAHC, upon notification of the discovery of Native American human remains pursuant to Health and Safety Code Section 7050.5, shall immediately notify the most likely descendant of the deceased. With permission of the landowner or a designated representative, the most likely descendant may inspect the remains and any associated cultural materials and make recommendations for treatment or disposition of the remains and associated grave goods. The most likely descendant shall provide recommendations or preferences for treatment of the remains and associated cultural materials within 48 hours of being granted access to the site.

California Native American Graves Protection and Repatriation Act

The California Native American Graves Protection and Repatriation Act (California Health and Safety Code Section 8010 et seq.) establishes a state repatriation policy consistent with, and facilitates implementation of, the federal Native American Graves Protection and Repatriation Act (which does not apply to the project because it is not on federal or Tribal land). The act strives to ensure that all California Native American human remains and cultural items are treated with dignity and respect, and asserts intent for the state to provide mechanisms for aiding California Native American Tribes, including nonfederally recognized Tribes, in repatriating remains and cultural items.

Local

City of San Bruno General Plan

The *San Bruno General Plan* (City of San Bruno 2009) was adopted March 24, 2009 and consists of Land Use, Economic Development, Transportation, Open Space and Recreation, Environmental Resources and Conservation, Health and Safety, and Public Facilities and Services and the Housing Element 2015–2023, adopted April 14, 2015.

The *San Bruno General Plan* includes the following policy that was adopted to avoid or mitigate environmental impacts on Tribal cultural resources and is applicable to the project (City of San Bruno 2009).

- **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.

3.15.2.2 Environmental Setting

Refer to Section 3.3, *Cultural Resources*, *Environmental Setting*, for a description of the precontact setting and ethnographic setting of the project area.

3.15.3 Environmental Impact Analysis

This section describes the environmental impacts of the project on Tribal cultural resources. It describes the thresholds used to determine whether an impact would be significant and methods used to evaluate the impacts. Measures to mitigate significant impacts are provided, where appropriate.

3.15.3.1 Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, the project would have the potential to have a significant effect on Tribal cultural resources if it would result in any of the following conditions.

a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC 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:

   i. Listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources, as defined in PRC Section 5020.1(k), or

   ii. 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 PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

3.15.3.2 Methodology and Approach

This analysis of Tribal cultural resources is based on a cultural resources records search conducted at the California Historical Resources Information System (CHRIS) - Northwest Information Center (NWIC) and a Sacred Lands File search through the NAHC, as well as an environmental setting and geoarchaeological sensitivity analysis. Refer to Section 3.3, *Cultural Resources*, *Methodology and Approach*, of this Draft EIR for further discussion of the cultural resources records search.

On August 15, 2023, ICF submitted a request to NAHC to review its Sacred Lands File for the project site. NAHC is the official state repository of Native American sacred location records in California. On August 24, 2023, ICF received a response from NAHC, stating that the result of the SLF search was negative. NAHC also provided a list of 11 Native American individuals from 10 Tribes who might have information that would be pertinent to the project or concerns regarding the proposed activities.

- Irene Zwierlein, Chairperson – Amah Mutsun Tribal Band of Mission San Juan Bautista
- Desiree Munoz and Carla Munoz, Tribal Liaison – Costanoan Rumsen Carmel Tribe
- Ann Marie Sayers, Chairperson – Indian Canyon Mutsun Band of Costanoan
- Kanyon Sayers-Roods, MLD – Indian Canyon Mutsun Band of Costanoan
- Chalene Nijmeh, Chairperson – Muwekma Ohlone Indian Tribe of the San Francisco Bay Area

- Monica Arellano, Vice Chairwoman – Muwekma Ohlone Indian Tribe of the San Francisco Bay Area
- Andrew Galvan, Chairperson – The Ohlone Indian Tribe
- Desiree Vigil, Tribal Consultant – The Ohlone Indian Tribe
- Vincent Medina, Tribal Consultant – The Ohlone Indian Tribe
- Kenneth Woodrow, Chairperson – Wuksache Indian Tribe/Eshom Valley Band

Letters with a description of the project, an invitation to consult under AB 52 and/or SB 18, and a request for the Tribes to respond with any information or concerns about the project were sent to the Tribes included in the NAHC response.[1] Copies of the letters are included in Appendix 3.15-1, *Tribal Outreach Materials*. The City did not receive any responses to the notification letters.

3.15.3.3 Buildout Scenario Evaluated

As discussed in Section 3.0.3.1, *Buildout Scenarios*, for each resource area studied, the EIR evaluates the buildout scenario with the greatest potential to result in a significant impact. In some cases, impacts would be the same regardless of the buildout scenario, so the analysis does not evaluate a specific buildout scenario. This approach ensures that the EIR identifies the maximum potential impacts of the project based on reasonably foreseeable development outcomes. Table 3.15-1 summarizes the approach used for each impact analysis related to Tribal cultural resources.

Table 3.15-1. Impact Analysis Approach for Tribal Cultural Resources

Impact Criteria	Scenario A	Scenario B	EIR Approach
Impacts TCR-1 and TCR-2: Cause a substantial adverse change in the significance of a Tribal cultural resource that is (a) 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), or (b) determined by the lead agency to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1?	—	—	Same for both scenarios. The project footprint, the presence or absence of Tribal cultural resources, and the project's general characteristics dictate the impacts on Tribal cultural resources. The project area, existing conditions, and general project characteristics are the same under both scenarios; therefore, the analysis approach is not based on one scenario or the other, and accounts for any future development that could occur under the project.

[1] Notification to the Costanoan Rumsen Carmel Tribe was provided to Carla Munoz, because no physical mailing address was provided for Desiree Munoz (also of the Costanoan Rumsen Carmel Tribe).

3.15.3.4 Impacts and Mitigation Measures

Impacts TCR-1 and TCR-2: The project would not cause a substantial adverse change in the significance of a Tribal cultural resource that is (a) 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), or (b) determined by the lead agency to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1 (Less than Significant with Mitigation).

The records search conducted at the NWIC did not identify any previously recorded archaeological resources in the project site, nor did any Tribes provide information about Tribal cultural resources. Notwithstanding, precontact (Native American) archaeological sites and Tribal cultural resources are known to exist in the San Francisco Bay Area region, generally. Therefore, the possibility that ground disturbance associated with construction of the project could affect unknown Tribal cultural resources cannot be eliminated. If previously unknown Tribal cultural resources are encountered during ground disturbance related to construction of the project, a significant impact on Tribal cultural resources could occur. Implementation of **Mitigation Measure CUL-2-A** and **Mitigation Measure CUL-2-B** in Section 3.3, *Cultural Resources*, would reduce this impact to ***less than significant with mitigation***.

Mitigation Measures

Mitigation Measure CUL-2-A: Conduct Cultural Resource Awareness Training and Exploratory Trenching Prior to Project-Related Ground Disturbance.

Refer to Section 3.3, *Cultural Resources*, of this Draft EIR.

Mitigation Measure CUL-2-B: Stop Work if Buried Cultural Deposits are Encountered During Construction Activities.

Refer to Section 3.3, *Cultural Resources*, of this Draft EIR.

3.15.4 References Cited

California Office of Planning and Research. 2005. Tribal Consultation Guidelines. Available: https://lci.ca.gov/docs/011414_Updated_Guidelines_922.pdf. Accessed: January 13, 2025.

City of San Bruno. 2009. *City of San Bruno General Plan.* Adopted March 24, 2009. Available: https://www.sanbruno.ca.gov/629/General-Plan. Accessed: January 20, 2025.

3.16 Utilities

3.16.1 Introduction

This section evaluates the potential impacts on utilities that could result from construction and operation of the Tanforan Redevelopment Project (project). This section also describes existing conditions at the project site as well as the regulatory framework for this analysis. Impacts resulting from implementation of the project, and feasible mitigation measures, where applicable, are also described.

Relevant technical documentation used in this analysis includes the following technical studies prepared for the project.

- *Tanforan Redevelopment Water Supply Assessment* (WSA) prepared by West Yost Associates, May 2025 (Appendix 3.16-1, *Water Supply Assessment*)
- *Water System Hydraulic Evaluation of the Tanforan Redevelopment Project* prepared by West Yost Associates, May 2025 (Appendix 3.16-2, *Water System Hydraulic Evaluation*)
- *Tanforan Redevelopment Project Sewer Impact Study* prepared by Woodard & Curran, April 2025 (Appendix 3.16-3, *Sewer Impact Study*)
- *Storm Drain System Capacity Study* prepared by Lotus Water Engineering, March 2025 (Appendix 3.8-1, *Storm Drain System Capacity Study*)
- *Groundwater Assessment for Redevelopment of the Tanforan Shopping Center City of San Bruno* prepared by EKI, May 2025 (Appendix 3.8-2, *Groundwater Assessment*).
- *Hydraulic Modeling Study* prepared by Akel Engineering Group Inc., May 2025 (Appendix 3.16-4, *Hydraulic Modeling Study*)

Issues identified in response to the Notice of Preparation (NOP) (Appendix 1-1, *Notice of Preparation and Comments Received on the Notice of Preparation*) were considered in preparing this analysis. One NOP comment pertaining to utilities was received. The comment was a request by the San Francisco Public Utilities Commission (SFPUC) for the project sponsor to obtain an Underground Service Alert request because SFPUC's Number 1 water transmission pipeline is located within the El Camino Real Public Right-of-Way. This issue is addressed below in Section 3.16.5.3, *Impacts and Mitigation Measures*, under Impact UT-1.

3.16.2 Existing Conditions

3.16.2.1 Regulatory Setting

This section summarizes regulations and policies that are relevant to the analysis of the project's potential impacts on utilities.

State

Urban Water Management Planning Act

Assembly Bill (AB) 797 (California Water Code Section 10610, et. seq.), adopted in 1983, requires that every urban water supplier providing water for municipal purposes to more than 3,000 customers or providing more than 3,000 acre-feet of water on an annual basis prepare an Urban Water Management Plan (UWMP). The intent of the UWMP is to assist water supply agencies in long-term water resource planning given their existing and anticipated future demands. UWMPs must be updated every 5 years in years ending in 0 and 5 (DWR 2020).

Senate Bill 610

Senate Bill (SB) 610 requires that certain large projects subject to the California Environmental Quality Act (CEQA) prepare a specified WSA (DWR 2003). The WSA must be furnished to the local government for inclusion in any environmental documentation for certain projects (as defined in Water Code 10912[a]) subject to CEQA. This legislation also expands the requirements for certain types of information in a UWMP, including an identification of any existing water supply entitlements, water rights, or water service contracts held relevant to the WSA for a proposed project, and a description of water deliveries received in prior years.

CEQA Guidelines Section 15155 requires preparation of a WSA when a project is of sufficient size to be defined as a "water demand project." A water demand project is a large-scale construction project, such as a residential development of more than 500 dwelling units; a shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space; or a commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space. A WSA has been prepared for the project, and is included in Appendix 3.16-1, *Water Supply Assessment*.

Senate Bill 221

SB 221 prohibits approval of subdivisions consisting of more than 500 dwelling units unless there is verification of sufficient water supplies for the project from the applicable water supplier(s) (DWR 2003). This requirement also applies to increases of 10 percent or more of service connections for public water systems with fewer than 500 service connections. The law defines criteria for determining "sufficient water supply," such as using normal, single dry-, and multiple dry-year hydrology and identifying the amount of water that the suppler can reasonably rely on to meet existing and future planned use.

Bay-Delta Plan Amendment

In December 2018, the California State Water Resources Control Board (SWRCB) adopted amendments to the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary (Bay-Delta Plan Amendment) to establish water quality objectives to maintain the health of the Bay-Delta ecosystem. SWRCB is required by law to regularly review this plan. The adopted Bay-Delta Plan Amendment was developed with the stated goal of increasing salmonid populations in three San Joaquin River tributaries (the Stanislaus, Merced, and Tuolumne Rivers) and the Bay-Delta. The Bay-Delta Plan Amendment requires the release of 30 to 50 percent of the

"unimpaired flow" on the three tributaries from February through June in every year type.[1] In SFPUC modeling of the new flow standard, it is assumed that the required release is 40 percent of unimpaired flow. SWRCB has stated that it intends to implement the Bay-Delta Plan Amendment on the Tuolumne River once all required approvals are obtained.

There is much uncertainty surrounding implementation of the Bay-Delta Plan Amendment. Since adoption of the Bay-Delta Plan Amendment, over a dozen lawsuits have been filed in both state and federal courts, challenging the SWRCB's adoption of the Bay-Delta Plan Amendment, including a legal challenge filed by the federal government, at the request of the U.S. Department of Interior, Bureau of Reclamation (Reclamation). On August 30, 2023, a U.S. District Court dismissed Reclamation's claim that the Bay-Delta Plan Amendment illegally discriminated against Reclamation with respect to salinity objectives that apply to operations of the New Melones Project, which Reclamation operates on the Stanislaus River. Additionally, on March 15, 2024, the Sacramento County Superior Court found that SWRCB's substitute environmental document did not violate the Porter-Cologne Act, CEQA, the public trust doctrine, or the California Constitution.

The Bay-Delta Plan Amendment is not self-implementing and does not automatically allocate responsibility for meeting its new flow requirements to SFPUC or any other water rights holders. Rather, the Bay-Delta Plan Amendment merely provides a regulatory framework for flow allocation, which must be accomplished by other regulatory and/or adjudicatory proceedings, such as a comprehensive water rights adjudication or, in the case of the Tuolumne River, may be implemented through the water quality certification process set forth in Section 401 of the Clean Water Act as part of the Federal Energy Regulatory Commission's licensing proceedings for the Don Pedro and La Grange hydroelectric projects. It is currently unclear when the license amendment process is expected to be completed. This process and the other regulatory and/or adjudicatory proceedings would likely face legal challenges and have lengthy timelines, and quite possibly could result in a different assignment of flow responsibility (and therefore a different impact on SFPUC water supply).

In recognition of the obstacles to implementation of the Bay-Delta Plan Amendment, SWRCB Resolution No. 2018-0059 adopting the Bay-Delta Plan Amendment directed staff to help complete a "Delta watershed-wide agreement, including potential flow measures for the Tuolumne River" by March 1, 2019, and to incorporate such agreements as an "alternative" for a future amendment to the Bay-Delta Plan to be presented to the SWRCB "as early as possible after December 1, 2019." In accordance with SWRCB's instruction, on March 1, 2019, SFPUC, in partnership with other key stakeholders, submitted a proposed project description for the Tuolumne River that could be the basis for a voluntary substitute agreement with SWRCB ("March 1st Proposed Voluntary Agreement"). On March 26, 2019, SFPUC adopted Resolution No. 19-0057 to support SFPUC's participation in the Voluntary Agreement negotiation process. In March 2022, the SWRCB received a Memorandum of Understanding proposing Voluntary Agreements for updating and implementing the Bay-Delta Plan. In September 2023, the SWRCB released a Draft Supplement Report in support of possible updates to the Bay-Delta Plan that are focused on the Sacramento River watershed, Delta, and Delta eastside tributaries (SWRCB 2023). This Draft Supplement Report was subsequently peer reviewed in February 2024 to confirm its scientific assumptions, findings, and conclusions. In April 2024, the SWRCB held a workshop to inform whether and how to incorporate the Voluntary Agreement proposal into the Sacramento/Delta updates to the Bay-Delta Plan. To date, those

[1] "Unimpaired flow represents the natural water production of a river basin, unaltered by upstream diversions, storage, or by export or import of water to or from other watersheds" (SWRCB 2018).

negotiations are ongoing under the California Natural Resources Agency and the leadership of the Newsom administration (California Natural Resources Agency).

California Integrated Waste Management Act

The California Integrated Waste Management Act, AB 939, passed in September 1989, requires every city and county in the state to prepare a Source Reduction and Recycling Element with its Solid Waste Management Plan that identifies how each jurisdiction will meet the mandatory state diversion goals of 25 percent by 1995 and 50 percent by 2000 (CalRecycle 2025d). The intent of AB 939 is to facilitate solid waste reductions, recycling, and reuse to the greatest extent possible. The bill imposes fines of up to $10,000 per day on cities and counties for noncompliance in meeting the goals and timelines set forth in AB 939.

Assembly Bill 1826

AB 1826 requires that state agencies, businesses, and multifamily complexes that generate specific quantities of organic or solid waste each week enroll in organic recycling programs through an applicable solid waste disposal company. AB 1826 defines organic waste as food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste. Solid waste is defined as the total of trash, recycling, and organics. Organic recycling programs may take the form of composting, mulching, or anaerobic digestion.

Businesses and multifamily residential housing complexes that generate the following quantities are required to implement organic or solid waste recycling programs under AB 1826.

- Eight or more cubic yards of organic waste per week.
- Four of more cubic yards of organic waste per week.
- Four or more cubic yards of solid waste per week.
- Two or more cubic yards of solid waste per week, if statewide disposal of organic waste is not reduced by half.

Phase two of AB 1826 focused on garbage service. In this phase, businesses and multifamily residential dwellings (five or more units) that generate 4 cubic yards or more of solid waste per week (garbage, recycling, and compost combined) would need to arrange for compost services by January 1, 2019. By January 1, 2020, the amount generated to trigger the requirement would decrease, and those who generate 2 cubic yards or more would also need to arrange for compost service.

CALGreen

CALGreen is California's first green building code and first in the nation state-mandated green building code. It is formally known as the California Green Building Standards Code, Title 24, Part 11, of the California Code of Regulations. The purpose of CALGreen is to improve public health, safety, and general welfare through enhanced design and construction of buildings using concepts that reduce negative impacts and promote those principles that have a positive environmental impact and encourage sustainable construction practices. CALGreen was adopted to address the five divisions of building construction: planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality (Sustainable Investment Group 2019). The City adopted the 2022 California Building Code by reference.

Regional and Local

San Francisco Public Utility Commission Right-of-Way Policies

SFPUC owns and manages land and water system infrastructure for its own exclusive use that is part of the Hetch Hetchy Regional Water System. The primary use of SFPUC lands and easements is for the delivery, operation, maintenance and protection of water, power, and sewer systems. SFPUC has adopted guidelines to help inform how and in which instances the easements can serve the needs of public agencies, private parties, nonprofit organizations, and developers, while maintaining the safety and security of SFPUC pipelines. SFPUC guidelines pertain to land use and structures, recreational use, utilities, vegetation, and water efficiency. The easements also are subject to terms and restrictions regarding use of land contained in the original deeds granting the easements to the SFPUC.

Water System Improvement Program

SFPUC's Water System Improvement Program (WSIP) was approved on October 31, 2008, with the purpose of improving the delivery reliability of the Regional Water System (RWS) that is operated by SFPUC. The following objectives of the WSIP are related to water supply.

- Meet average annual water demand of 265 million gallons per day (mgd) from the SFPUC watersheds for retail and wholesale customers during nondrought years for system demands consistent with the 2009 Water Supply Agreement.
- Meet dry-year delivery needs while limiting rationing to a maximum 20 percent system-wide reduction in water service during extended droughts.
- Diversify water supply options during nondrought and drought periods.
- Improve use of new water sources and drought management, including groundwater, recycled water, conservation, and transfers.

The WSIP provides benefits to the City by improving the reliability of wholesale water purchased from SFPUC, especially during periods of drought. The program aims to meet customer water needs in nondrought and drought conditions and provides dry-year water supply projects to augment all year type water supplies during drought. The overall completion date for the WSIP was May 5, 2023 (SFPUC 2025).

Regional Groundwater Storage and Recovery Project

In December 2014, the Regional Groundwater Storage and Recovery (GSR) Project operating agreement was signed to ensure long-term management and sustainability of the South Westside Groundwater Basin through a strategic conjunctive use partnership. The partnership with the City of San Bruno, SFPUC, California Water Service (serving South San Francisco and Colma), and the City of Daly City allows the agencies to operate the basin jointly and provides a new 20-billion-gallon regional dry-year groundwater supply. The project is included as part of the SFPUC WSIP. The City implemented conjunctive use operations starting in 2016.

The Regional GSR Project is an in-lieu groundwater recharge program that balances groundwater and the SFPUC RWS to increase drought year water supplies. Under the Regional GSR Project, the City operates under two supply modes that vary according to hydrologic conditions. During wet and normal years ("put" operations), SFPUC provides additional surface water to the City to reduce the

City's groundwater pumping. The additional supply is stored in the South Westside Basin as groundwater until it is needed during a drought or emergency. During dry years ("take" operations), the City utilizes available groundwater supplies and reduces surface water deliveries, thereby freeing surface water supply to be delivered to other SFPUC customers.

San Mateo Countywide Stormwater Pollution Prevention Program

The City of San Bruno is 1 of 20 participating cities in the San Mateo Countywide Water Pollution Prevention Program, which manages a shared National Pollutant Discharge Elimination System (NPDES) permit utilized by all participating agencies (CCAG 2025). The program ensures that participating jurisdictions manage stormwater runoff flows such that contaminated water runoff and discharge into waterbodies is minimized. The program accomplishes this by directing construction projects, municipal operations, and other potential stormwater sources countywide to incorporate appropriate Low-Impact-Development (LID) measures that contain, filter, and treat stormwater prior to discharge. The City of San Bruno administers stormwater quality protection through the C.3 Municipal Regional Stormwater Permit (MRP), which is issued under NPDES and by the Regional Water Quality Control Board (Regional Water Board) through this program.

Sanitary Sewer Management Plan/Sewer Master Plan

The *City of San Bruno Sewer System Management Plan* (SSMP) is a comprehensive planning document that describes the policies and procedures required to maintain compliant sewer services citywide (City of San Bruno 2019a). SSMPs are developed and implemented to effectively manage sanitary sewer systems in accordance with the Statewide Waste Discharge Requirements (WDR) General Order for Sanitary Sewer Systems. The current City of San Bruno SSMP document is being updated per the current Statewide WDR General Order, and is expected to be completed by August 2025. These policies help fulfill SWRCB and San Francisco Bay Regional Water Board water quality and sewer management requirements and to prevent sanitary sewer overflows and maintain water quality. Generally, goals and policies described in the SSMP pertain to maintaining adequate sanitary sewer conveyance capacity, minimizing sewer overflow incidents, and preventing illicit discharges including contaminated stormwater chemicals, debris, fats, oils and grease. The City's Sewer Master Plan (City of San Bruno 2014) provides an assessment of the capacity and condition of the City's sanitary sewer system to identify needed improvements to provide adequate hydraulic capacity and repair, rehabilitate, and/or replace older sewers or sewers in poor condition. The Sewer Master Plan is currently being updated, with completion anticipated in early 2026.

2020 Urban Water Management Plan

The *City of San Bruno 2020 Urban Water Management Plan* (West Yost Associates 2021) provides both current and future water supply planning guidance and implementation strategies citywide in accordance with Regional Water Board requirements and with the Urban Water Management Planning Act (AB 797). The UWMP is intended to preserve water resources in San Bruno to ensure sufficient water supplies and adequate water quality in the City based on cataloged and projected water use data and the City's Individual Supply Guarantee, the amount of SFPUC-provided surface water resources that are guaranteed for purchase.

Relevant to the potential Bay-Delta Amendment, the UWMP notes the following (West Yost Associates 2021).

A new constraint on SFPUC supply, as of 2023, is the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary (Bay-Delta Plan Amendment). The implementation of the Bay-Delta Plan Amendment comes with uncertainty due to pending lawsuits and efforts to have the State Water Resources Control Board adopt the Tuolumne River Voluntary Agreement, as part of a Global Voluntary Agreement package. As presented by SFPUC and BAWSCA, the impacts of the Bay-Delta Plan Amendment will be significant (more than 50 percent cut back possible) in multiple drought years for wholesale customers of the RWS.

The 2020 UWMP also includes a Water Shortage Contingency Plan (WSCP), a six-stage plan describing specific actions to reduce water demand by greater than 50 percent in the event of a water supply shortage or emergency.

City of San Bruno Water System Master Plan

The City's *2022 Water System Master Plan* (WSMP), dated December 2022, serves as an update to the WSMP and provides a comprehensive road map for the City's water system through 2040. In addition to assessing the City's projected supply and demand through 2040, the 2022 WSMP updates the City's hydraulic model and evaluates the performance of the existing and future water system under existing and 2040 buildout water demand conditions. Based on the results of the performance analysis, the 2022 WSMP identifies pipeline and facility rehabilitation and replacement projects.

Storm Drain Master Plan

The *City of San Bruno Storm Drain Master Plan* guides storm drain infrastructure planning to help reduce overall storm drain runoff and localized flooding risks, with special consideration for site topography, drainage patterns, and system capacity limitations (City of San Bruno 2014). The Storm Drain Master Plan identifies the storm drain system currently serving the project site as consisting of underground pipes, box culverts, and channels.

City of San Bruno Green Infrastructure Plan

The *City of San Bruno Green Infrastructure Plan* (City of San Bruno 2019b), approved in August 2019 as a requirement of the MRP, guides sustainable development in the City, with a focus on converting the City's public property and public right-of-way from a traditional "grey" infrastructure system, in which stormwater flows across impervious surfaces directly into storm drains, to an integrated approach that will direct runoff to vegetated areas for LID stormwater treatment infiltration. The plan intends to identify and prioritize LID opportunities citywide in which such stormwater management infrastructure can be installed in the form of bioretention areas, stormwater tree well filters, suspended pavement systems, pervious pavement, infiltration facilities, green roofs, and rainwater harvesting facilities.

City of San Bruno Transit Corridors Plan

The *City of San Bruno Transit Corridors Plan* (City of San Bruno 2013), approved in February 2013, provides a road map for improving the public and private realms in the City. Specifically, the Transit Corridors Plan provides a vision for the downtown core of San Bruno, historically represented by San Mateo Avenue and the streets directly adjacent to it, including El Camino Real, San Bruno Avenue and Huntington Avenue. The plan includes design guidelines related to stormwater management, passive heating and cooling, and water and energy efficiency. It also includes proposed utility improvements for San Mateo Avenue, El Camino Real, and San Bruno Avenue.

City of San Bruno General Plan

The *San Bruno General Plan* outlines a vision for the long-range physical and economic development of the community through 2025. The *San Bruno General Plan* includes the following policies adopted for the purpose of avoiding or minimizing environmental effects applicable to utilities and service systems proposed in San Bruno.

- **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.
- **PSF-D:** Ensure that the City of San Bruno's wastewater collection and treatment systems are adequate to serve the city's present and anticipated needs, are safe, and are environmentally sound.
- **PFS-20:** Require expansion of the City of San Bruno'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-72:** Work with utility providers to ensure that adequate electrical and natural gas facilities and services are available to meet the demands of existing and future development.
- **PFS-73:** Provide for utility access and prevent easement encroachments that might impair the safe and reliable maintenance and operation of utility facilities.
- **PFS-74:** Work with telecommunication providers to ensure that telecommunications service is available for existing and future development.

3.16.2.2 Environmental Setting

Regional Setting

Water Supply, Demand, and Conveyance System

The City currently uses water from the following sources.

- Treated surface water from the City and County of San Francisco's RWS, operated by SFPUC, served through four connections to the City's water system.
- Treated surface water purchased from the North Coast County Water District (NCCWD).
- Local groundwater from the Westside Groundwater Basin.

In recent years, approximately 90 percent of the City's water supply has been from the SFPUC and NCCWD. San Francisco has a perpetual commitment (Supply Assurance) to deliver 184 mgd to the 24 permanent wholesale customers collectively. The Supply Assurance is allocated among the 24 permanent wholesale customers through Individual Supply Guarantees, which represent each wholesale customer's allocation of the 184 mgd Supply Assurance. The City's Individual Supply Guarantees of that total is 3.25 mgd. Water purchased from the NCCWD is also from the RWS, but is delivered to the City via NCCWD's system, and is used exclusively to meet the demands of the Crystal Springs Terrace Apartments.

Local groundwater supply for the City is from the Westside Basin, which is used by the Cities of San Bruno, Daly City, and South San Francisco. The City operates multiple production wells that extract groundwater from the central portion of the 40-square-mile Westside Basin, i.e., Basin 2-35, as defined by the State of California Department of Water Resources (DWR). The City has used groundwater as a source of supply since the early 1900s. Prior to 2016, groundwater use comprised about 50 percent of the City's total water supply. In 2016, the City reduced its use of groundwater in accordance with the Regional GSR Project. The City is located within the South Westside Basin Area, a very low priority basin (West Yost Associates 2025).

The City's historical and current (Fiscal Year [FY] 2019/20) potable water use among its various water use sectors is presented in Table 3.16-1. As shown, total water use has decreased between FY 2004/05 and FY 2019/20.

Table 3.16-1. Historical and Current Use for Potable Water Demands

	Water Use (mgd)			
Water Use Sector	**FY 2004/05**	**FY 2009/10**	**FY 2014/15**	**FY 2019/20**
Residential	2.78	2.48	2.14	2.14
Commercial	0.52	0.59	0.62	0.55
Governmental (City parks and facilities)	--	0.17	0.13	0.18
Other	0.32	0.01	--	--
Water losses	0.15	0.40	0.25	0.25
Total (mgd)	**3.76**	**3.65**	**3.14**	**3.12**
Total (CCF/YR)	**1,834,638**	**1,780,965**	**1,529,900**	**1,523,986**

Source: West Yost Associates 2025. Note that the current UWMP for San Bruno is the 2020 UWMP. 2025 UWMPs are due for submission to DWR no later than July 1, 2026.
mgd = million gallons per day; FY = fiscal year; CCF/YR = cubic feet per year

By 2040, the City's potable water demands are projected to reach 4.78 mgd. Table 3.16-2 summarizes the City's existing and projected potable water demands. As shown in Table 3.16-2, the City does not anticipate the future use of recycled water within its service area.

Table 3.16-2. Existing and Projected Potable and Recycled Water Demand

Water Supply Source	**2020 (Actual)**	**2025**	**2030**	**2035**	**2040**	**2045**
Potable Water, mgd	3.12	3.53	3.95	4.37	4.78	4.78
Recycled Water, mgd	0	0	0	0	0	0
Total (mgd)	**3.12**	**3.53**	**3.95**	**4.37**	**4.78**	**4.78**
Total (CCF/YR)	**1,523,986**	**1,724,349**	**1,929,187**	**2,134,026**	**2,333,474**	**2,333,474**

Source: West Yost Associates 2025
mgd = million gallons per day; CCF/YR = cubic feet per year

The City has two water supply modes: (1) during wet and average years ('put' years), additional surface water is delivered to the City by the SFPUC, in-lieu of the City pumping groundwater, and (2) during drought years ('take' years), the City maximizes its use of groundwater and supplements with surface water to minimize the use of SFPUC supply. A summary of the City's existing sources of water during 'put' years and 'take' years is provided in Table 3.16-3 and compared with actual FY 2019/20 water use.

Table 3.16-3. Current Water Supply

Water Source	Available During 'Put' Years	Available During 'Take' Years	FY 2019/20 Actual
SFPUC (mgd)	5.35	3.25	2.86
NCCWD (mgd)	0.05	0.05	0.03
Groundwater (mgd)	0.00	2.10	0.23
Total Water Supply (mgd)	**5.40**	**5.40**	**3.12**
Total Water Supply (CCF/YR)	**2,635,027**	**2,635,027**	**1,523,986**

Source: West Yost Associates 2025.
mgd = million gallons per day; CCF/YR = cubic feet per year; FY = fiscal year

Wastewater Generation, Conveyance, and Treatment

The City's Public Works Department's Wastewater Division is responsible for the wastewater collection system and assures compliance with all permit requirements for the U.S. Environmental Protection Agency (EPA), SWRCB, the Regional Water Board, County Health Mandates, and NPDES. The sanitary sewer system consists of approximately 90 miles of active gravity sewers and force mains and six lift stations. Currently, 3.4 million gallons of effluent per day (mgd) from San Bruno goes to the South San Francisco-San Bruno Water Quality Control Plant that the City of San Bruno owns jointly with the City of South San Francisco (City of San Bruno n.d.). The City estimates average discharges of 75 gallons per day per capita for residential users, 1,000 gallons per day per acre for commercial use, and 2,000 gallons per day per acre of industrial use.

The average dry weather flow through the facility as of 2022 is approximately 7 mgd. Design capacity is 13 mgd with dry flows averaging 7 mgd. Peak wet weather flows can exceed 60 mgd, exceeding design capacity. The per capita flow rate over the last 10 years has averaged 79 gallons per capita per day (City of South San Francisco 2022). To accommodate peak wet-weather flows, the South San Francisco-San Bruno Water Quality Control Plant is in the process of conducting facility improvements, which would include installation of a new storage basin to retain excess flows during wet-weather conditions (City of San Bruno 2022). During the wet season, infiltration/inflow into the City's wastewater system also has been a continuing problem because wet-weather flow can cause collection system overflows. As part of settlement of a lawsuit by San Francisco Baykeeper regarding sanitary sewer overflows as well as an order from the San Francisco Regional Water Board, the City had to limit maximum annual sanitary overflows to eight by 2019 under the Regional Water Board agreement and a maximum of three under the 2011 Baykeeper agreement (City of San Bruno 2019a). The settlement also established that by January 1, 2020, discharges must be fully in compliance and prohibit any sanitary sewer overflows that results in a discharge of untreated or partially treated wastewater.

Stormwater Drainage

The City's storm drain system consists of underground pipes and culverts, as well as aboveground channels. The storm drainage system generally drains eastward toward San Bruno Channel, within San Francisco Bay. The City's storm drain system is divided into six Watershed areas with associated drainage infrastructure: Watershed A through Watershed F. The majority of the northern and northwestern portion of San Bruno is located within the 1,415.8-acre Watershed A. Watershed A discharges to San Bruno Channel (City of San Bruno 2014).

As described in the Regulatory Setting section above, in 2014, the City developed a Storm Drain Master Plan to address storm drain capacity deficiencies citywide. The Storm Drain Master Plan considers multiple strategies for inclusion in a Stormwater Capital Improvement Plan to address storm drain capacity exceedances including the installation of a detention basin, which has been considered infeasible, and the installation of additional and/or expanded stormwater pipes in key areas.

Solid Waste

Recology San Bruno provides solid waste disposal services citywide, including garbage, recycling, and organic composting services. Recology San Bruno transports solid waste to the San Bruno Transfer Station at 101 Tanforan Avenue, where solid waste is processed, treated, and transported to other disposal facilities. The San Bruno Transfer Station has a maximum permitted capacity of 768 tons of solid waste per day (CalRecycle 2025c). From the San Bruno Transfer Station, most of the City's solid waste is transported via trucks to Corinda Los Trancos Landfill (SWIS 41-AA-0002, formerly Ox Mountain Landfill) in Half Moon Bay, which has a remaining capacity of 17,240,000 cubic yards, a maximum permitted disposal capacity of 3,598 tons per day, and is estimated to close in 2034; it serves the City of San Bruno as well as numerous other Bay Area jurisdictions (CalRecycle 2025b).

In 2023, the City of San Bruno generated 25,737.61 tons of solid waste, with residents generating approximately 3.3 pounds of solid waste per capita per day and employees generating 8.8 pounds of solid waste per capita per day (CalRecycle 2025a). CalRecycle's 2023 disposal goals for the City of San Bruno were 4.5 pounds per day for residents and 15.9 pounds per day for employees; therefore, the City of San Bruno met its per capita solid waste diversion goals in 2023. Per capita solid waste generation in the City has decreased over time due to numerous waste diversion programs, including source reduction, recycling, composting, incentivization, and public education initiatives.

Electricity, Natural Gas, Telecommunication Services

Peninsula Clean Energy (PCE) is San Mateo County's default electricity provider. Individuals can opt out of PCE and switch to Pacific Gas and Electric Company (PG&E) service at any time, but PCE is the county's default provider, and their rates are lower than or comparable to PG&E, depending on the selected PCE rate plan. PCE supplies the electricity, then PG&E delivers the electricity using their utility infrastructure (PCE 2025). Therefore, it is reasonably presumed that PCE would be the electricity supplier for the project, with PG&E delivering the electricity.

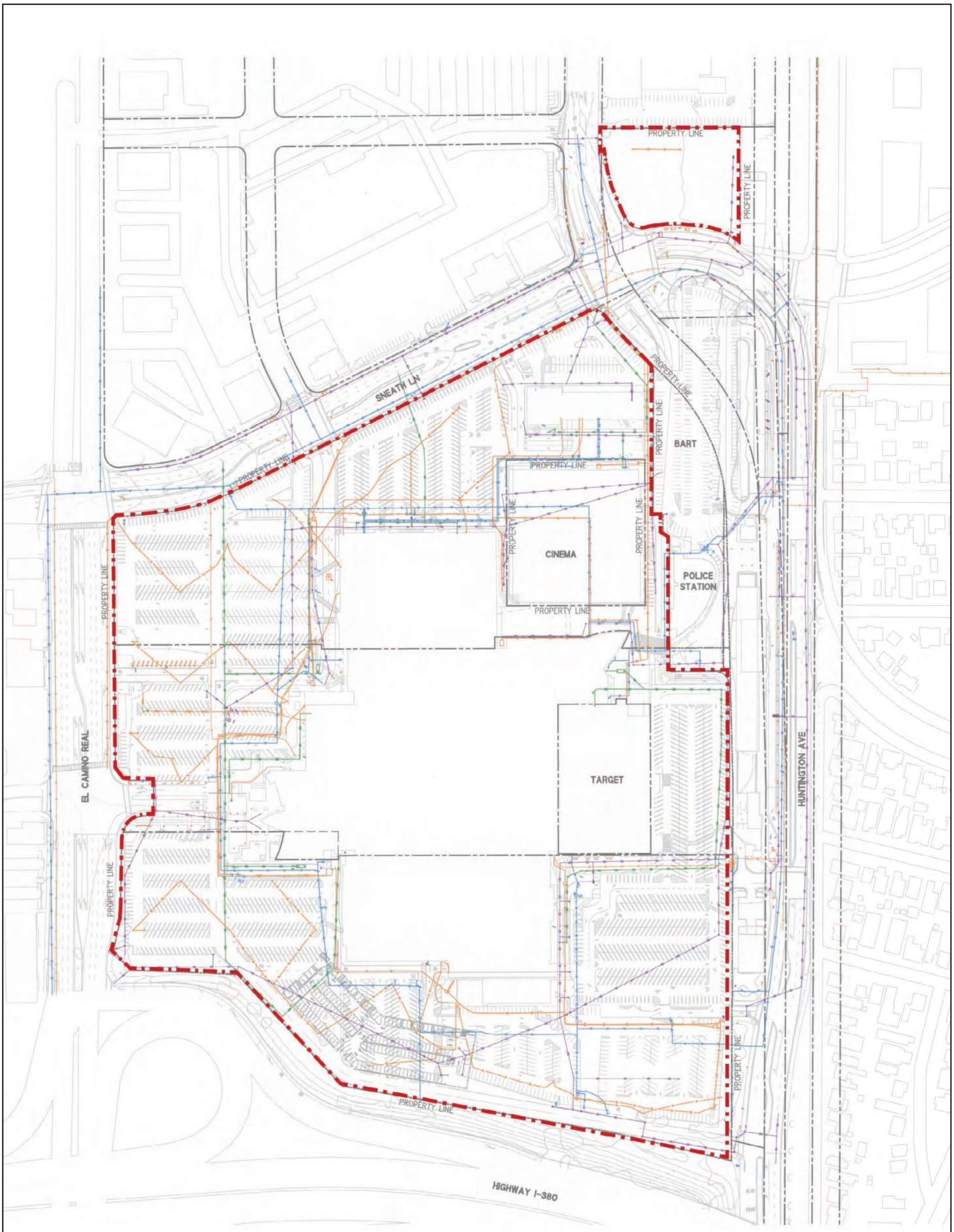
PCE's power comes from a mix of various sources, including solar, wind, geothermal, biomass and biowaste, and hydroelectric generation resources. PG&E obtains its energy supplies from power plants and natural gas fields in Northern California and from energy purchased outside its service area and delivered through high voltage transmission lines. Electrical power is provided to the City from eight different distribution feeders, and natural gas is provided by PG&E from three gas lines stretching from Milpitas to San Francisco. According to PG&E, residential uses comprise the majority of energy loads in San Bruno because the City has very few large commercial or industrial customers.

The eight different distribution feeders that provide electrical power to San Bruno are four feeders from the Sneath Lane substation in San Bruno, two feeders from the East Grand substation in South San Francisco, one fed from the Airport substation, and one originating from the Millbrae substation in Millbrae. Most of these feeders also serve other cities, including Pacifica, Millbrae, and South San Francisco, and are linked to other distribution feeders, assuring greater reliability. Natural gas is delivered from basins in Canada and/or Texas by transmission mains and deposited at PG&E's Milpitas Gas Terminal. PG&E has existing easements on and near the project site to transmit natural gas and electricity to the site.

The City is served by both wired and cellular telecommunications providers. City Net Services (formally San Bruno Cable TV) and AT&T California provide the City with wired telecommunications services. Mobile cellular service, including mobile data, is provided by major carriers including Verizon Wireless, T-Mobile, Sprint, and AT&T.

Project Site

Existing utilities within and near the project site are described in the sections below and shown in Figures 3.16-1 through 3.16-3.



Legend

Property line

Utilities

- Storm drain pipe
- Sanitary sewer pipe
- Water pipe
- Electrical line
- Gas line
- Joint trench line
- Street light line
- Telecommunications line

N

Source:
Alexandria and Gensler, 2024

Graphics ... City_San_Bruno/104709 (3-12-25).tag

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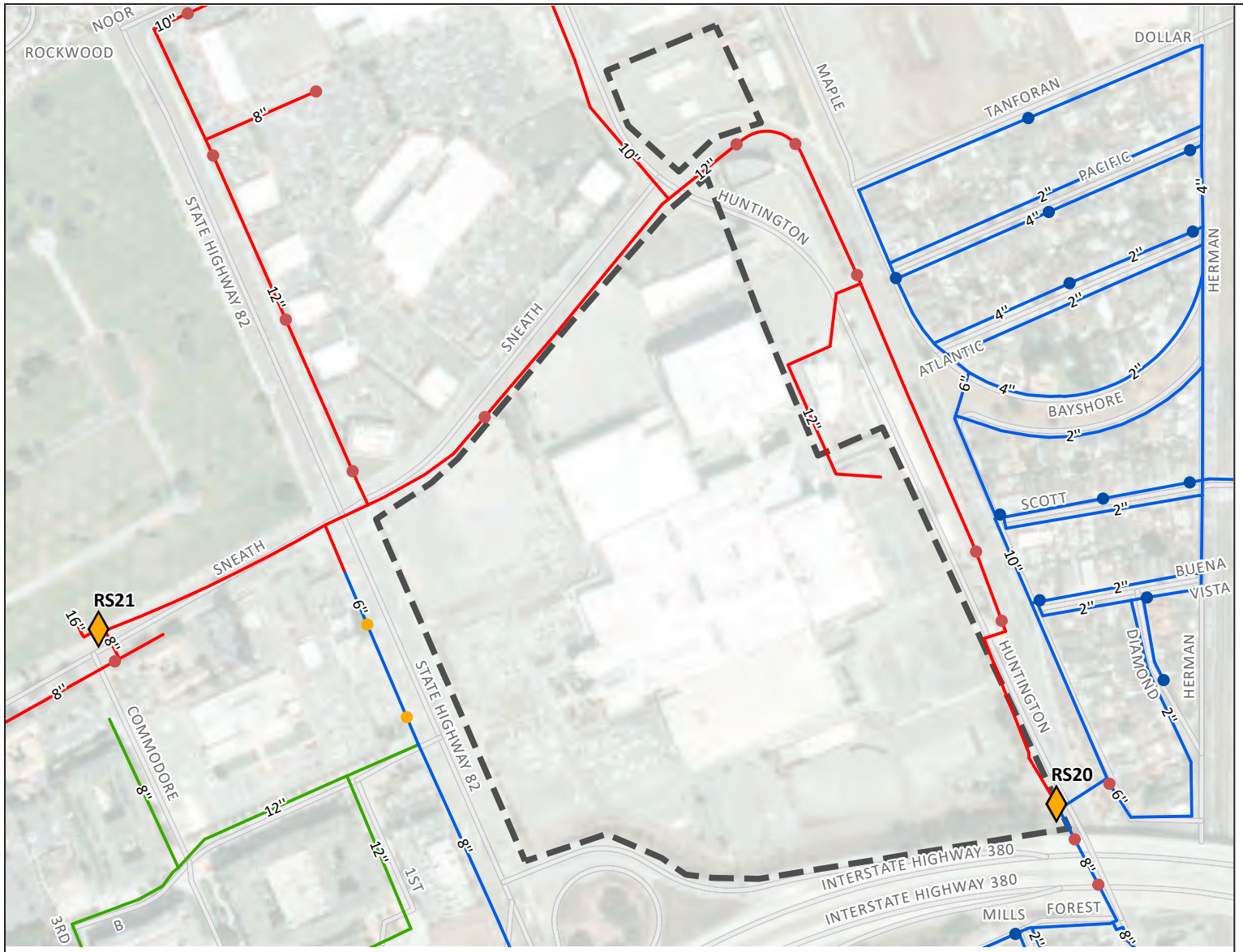
Figure 3.16-1
Existing Utilities Near the Project Site



Legend

- Pressure Regulating Station

Fire Flow Requirement

- 1,500 gpm
- 2,000 gpm
- 2,500 gpm
- 3,000 gpm

Existing Pipelines by Zone

- Zone 1/4A
- Zone 1/4
- Zone 3
- Project Boundary

N

0 400 Feet

Source:
West Yost, 2025

Graphics ... City_San_Bruno/104709 (5-29-25) tag

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Figure 3.16-2
Existing Water Infrastructure

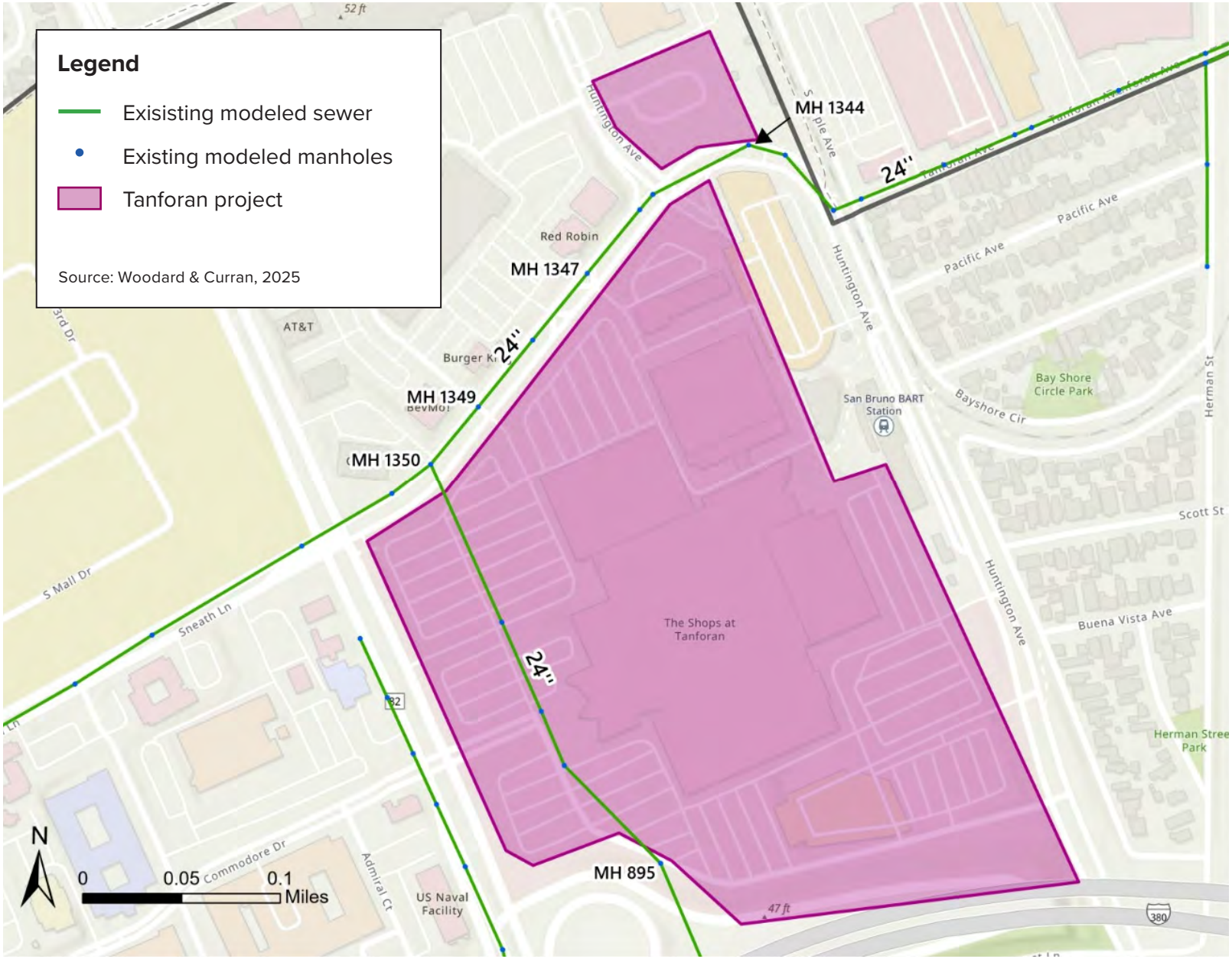

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Figure 3.16-3
Existing Wastewater Infrastructure

Water Demand and Conveyance System

The project is located in the vicinity of existing Pressure Zone 1/4A (Zone 1/4A) pipelines of the City's water system, as shown on Figure 3.16-2. The project site is served by a system of 10-inch and 12-inch-diameter pipes that supply potable water to the project site. These include 10-inch pipes in the northern portion of Huntington Avenue and 12-inch pipes in Sneath Lane and the southern portion of Huntington Avenue. Water is then conveyed into the project site through water conveyance pipelines located on all sides of the site, which can be seen in Figure 3.16-1.

Existing water use at the project site was based on the 2019 metered water consumption data for the project parcels, as evaluated in the 2022 WSMP. To account for the total existing water demand for the project parcels, the 2019 metered water consumption data were scaled to match the 2019 production data by applying a factor of 14 percent.[2] Therefore, the total existing potable water demand of the project site is approximately 0.07 mgd.

Wastewater Generation, Conveyance, and Treatment

As shown in Figures 3.16-1 and 3.16-3, the project site is served by City-owned sewers located within Sneath Lane and El Camino Real, and they extend through the project site. Sewer flows from the project site are currently conveyed to the existing 24-inch gravity sewer that runs northeast through the site and discharge into the 24-inch gravity pipe at Tanforan Avenue. The flows are then conveyed east into the City of South San Francisco's Shaw Road Pump Station via 24-inch to 27-inch gravity pipes. Sewage is ultimately pumped into the South San Francisco/San Bruno Water Quality Control Plan (WQCP) via 28-inch and 42-inch force mains that run under Highway 101.

The existing 24-inch trunk sewer runs north through the Tanforan development site from manhole 895, located just south of the project site adjacent to the I-380 interchange, to existing manhole 1350 on the 24-inch sewer in Sneath Lane, located approximately 300 feet east of El Camino Real (Figure 3.16-3). The existing 24-inch trunk sewer in Sneath Lane continues east to Huntington Avenue and then follows Tanforan Avenue to the point where it discharges to South San Francisco's line going to the Shaw Road Pump Station.

The sewer lines within Sneath Lane and El Camino Real, in addition to the pipes that traverse the project site, eventually terminate at the Shaw Road Pump Station in the City of South San Francisco. From the Shaw Road Pump Station, wastewater is conveyed to and treated at the South San Francisco/San Bruno WQCP. All wastewater and sewage generated within the project site follows this path, discharging into the South San Francisco system through the Tanforan Avenue pipeline segment.

Stormwater Drainage

The existing storm drain network at the project site includes multiple connections to the City's storm drain system, as shown in Figure 3.16-1. The project site drains southeast into the City's storm drain under I-380 and northeast through Huntington Avenue toward the City of South San Francisco's storm drain. The existing storm drain network circles the project site and includes outlet connections in the southwest, southeast, and northeast corners of the site.

[2] Metered consumption was scaled to match the City's 2019 production data by applying a factor of 14 percent. Refer to the WSA prepared for the project for further discussion (Appendix 3.16-1, *Water Supply Assessment*).

Solid Waste

As described above, Recology San Bruno provides solid waste disposal services citywide, including within the project site. Compost, recycling, and garbage pickup are brought by Recology service providers to the San Bruno Transfer Station for processing and sorting; solid waste is then transferred to Corinda Los Trancos Landfill.

Based on a rate of 8.8 pounds per employee per day provided by CalRecycle, and an existing employment of 2,244 employees (Section 3.11, *Population and Housing*), existing uses within the project site are estimated to generate approximately 19,747.2 pounds of solid waste per day (CalRecycle 2025a).

Electricity, Natural Gas, Telecommunication Services

Figure 3.16-1 shows the electrical lines and natural gas pipelines that currently serve the project site. The project site is served by existing PG&E electric lines that surround the project site. Distribution lines are conveyed from these electric transmission lines to electricity users within the project site.

There are PG&E natural gas conveyance pipelines located within El Camino Real, through the parking lot on the west side of the project site, along the property line on the east side of the project site, within Huntington Avenue, and through the parking lot south of Target. The project site is served by an underground CityNet Services and coaxial cable telecommunications system that extends throughout the site.

3.16.3 Environmental Impact Analysis

This section describes the environmental impacts of the project on utilities. It describes the thresholds used to determine whether an impact would be significant and methods used to evaluate the impacts. Measures to mitigate significant impacts are provided, where appropriate.

3.16.3.1 Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, the project would have the potential to have a significant effect on utilities if it would result in any of the following conditions.

a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

c. Result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

d. 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?

e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

3.16.3.2 Methodology and Approach

Utilities and service systems impacts associated with construction and operation of the project were assessed and quantified, where applicable, using standard and accepted software tools and techniques. The utilities and service systems impact analysis considers whether project implementation would result in impacts on utilities systems due to either construction or operational circumstances. Impacts could include exceedances of existing system capacity, a need to expand utilities systems to meet future needs with project implementation, or supply availability impacts, such as potential project-related exceedances of available water resources. Potential project-related impacts on utilities and service systems were evaluated based on existing capacity and demand data identified in the WSA, Water System Hydraulic Evaluation, Sewer Impact Study, Storm Drain System Capacity Study, and Hydraulic Modeling Study, as well as from site plans and publicly available sources.

3.16.3.3 Buildout Scenario Evaluated

As discussed in Section 3.0.3.1, *Buildout Scenarios*, for each resource area studied, the EIR evaluates the scenario with the greatest potential to result in a significant impact. In some cases, impacts would be the same regardless of the buildout scenario, so the analysis does not evaluate a specific buildout scenario. This approach ensures that the EIR identifies the maximum potential impacts of the project based on reasonable foreseeable development outcomes. Table 3.16-4 summarizes the approach used for each impact analysis related to utilities.

Table 3.16-4. Impact Analysis Approach for Utilities

Impact Criteria	Scenario A	Scenario B	EIR Approach
Impact UT-1: Require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	Scenario A has more life-science laboratory and office uses and more amenity uses.	Scenario B has more residential and hotel uses.	Both Scenarios. Scenario B results in the highest buildout water demand, with a total projected demand of 0.38 mgd (net increase). Scenario B also results in the highest base wastewater flow, with an average base wastewater flow of 0.458 mgd. Post-project impervious surface would be greater under Scenario B, resulting in a greater volume of stormwater. Therefore, for water, wastewater, and stormwater, Scenario B is evaluated because it has the greater potential to exceed available infrastructure capacity and require relocation or construction of new infrastructure. Air quality modeling outputs conducted for both scenarios indicate that Scenario A would consume more energy during operation. Therefore, for electric and natural gas infrastructure, Scenario A is evaluated. Impacts on telecommunications facilities would be substantially similar under either scenario.

Impact Criteria	Scenario A	Scenario B	EIR Approach
Impact UT-2: Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	Scenario A has more life-science laboratory and office uses and more amenity uses.	Scenario B has more residential and hotel uses.	Scenario B (Residential Scenario). Scenario B results in the highest buildout water demand, with a total projected demand of 0.38 mgd (net increase).
Impact UT-3: Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	Scenario A has more life-science laboratory and office uses and more amenity uses.	Scenario B has more residential and hotel uses.	Scenario B (Residential Scenario). Scenario B results in the highest base wastewater flow, with an average base wastewater flow of 0.458 mgd.
Impact UT-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?	Scenario A has more life-science laboratory and office uses and more amenity uses.	Scenario B has more residential and hotel uses.	Scenario A (R&D Scenario). Scenario A results in the highest solid waste generation, with a net new daily solid waste generation of 15.3 tons.
Impact UT-5: Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	Scenario A has more life-science laboratory and office uses and more amenity uses.	Scenario B has more residential and hotel uses.	Scenario A (R&D Scenario). Scenario A results in the highest solid waste generation, with a net new daily solid waste generation of 15.3 tons.

mgd = million gallons per day

3.16.3.4 Impacts and Mitigation Measures

Impact UT-1: The project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which would cause significant environmental effects (Less Than Significant With Mitigation).

The project would involve the relocation, construction, or expansion of numerous utility facilities to provide utilities services for the new land uses associated with the project, as described in Table 3.16-5. These proposed utility expansions are a part of the project description, and the potential impacts that would result from construction of these facilities are evaluated throughout this EIR (Section 3.1, *Air Quality*; Section 3.8, *Hydrology and Water Quality*; and Section 3.10, *Noise and Vibration*). The proposed utility expansions would occur under any development scenario. The purpose of the analysis in this section is to evaluate whether the proposed facilities would have adequate capacity to serve the project's demand for utilities and service systems during construction and operation, or whether further relocation or construction of new or expanded facilities would be required.

Table 3.16-5. Proposed Water, Wastewater, and Storm Drain Improvements

Existing Facility	Location	Proposed Action
None	In the project area bounded by Sneath Lane, Huntington Avenue, I-380, and SR 82	Installation of a network of 12-inch-diameter water mains.
None	In the project area bounded by Sneath Lane, Huntington Avenue, I-380, and SR 82	Installation of a network of sewer pipelines.
24-inch trunk sewer through project site	Through existing project site from north of I-380 interchange (manhole 895) to Sneath Lane (manhole 1349)	Divert flow at manhole 895 and construct 1,868 feet of new 30-inch HDPE sewer along south boundary of project site west to El Camino Real, along El Camino Real north to Sneath Lane, and along Sneath Lane east to Seabiscuit Lane (connect to existing manhole 1349).
None	In the project area bounded by Sneath Lane, Huntington Avenue, I-380, and SR 82	Installation of a network of storm drain pipelines.

HDPE = high-density polyethylene

The proposed utility improvements are shown in Figures 3.16-4a and 3.16-4b; the proposed water infrastructure improvements are shown in Figure 3.16-5; and the proposed wastewater infrastructure improvements are shown in Figure 3.16-6.

Construction

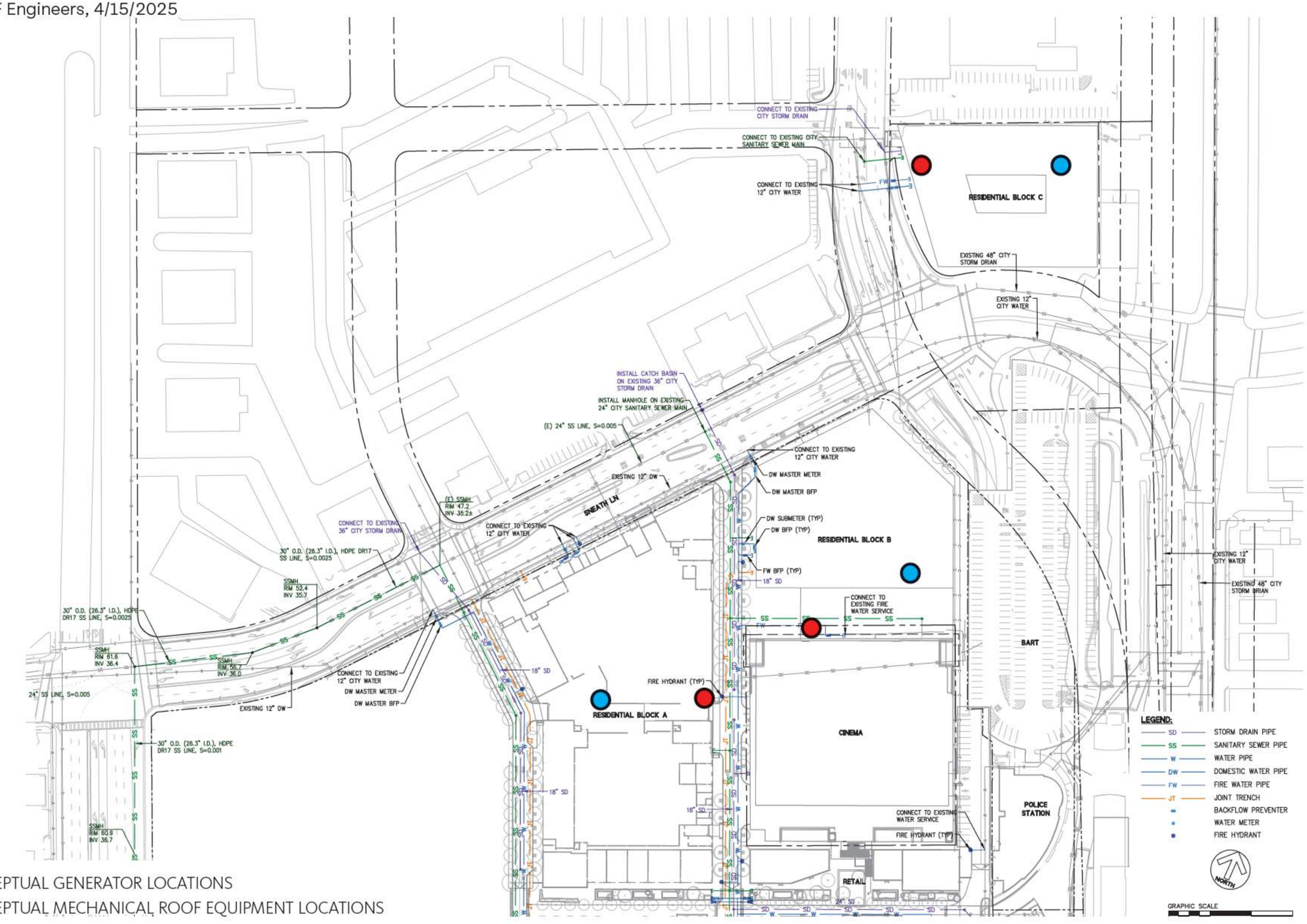
Construction activities within the project site would be served by existing utility systems and infrastructure. Because there is adequate utility service available at the project site to serve the existing uses, it is reasonably expected that construction activities requiring electricity, such as lighting and operation of construction equipment, would be serviced by existing electric outlets and that no expansion of electrical facilities would be necessary to serve construction activities. Additionally, because it is expected that construction equipment would operate with gasoline- or diesel-powered engines, the need to install additional electric connections is not anticipated. Furthermore, natural gas and telecommunications facilities are generally not used during construction. Limited construction-phase water needs for activities such as dust suppression would be met through the metered use of water conveyed by water trucks and tanks. Because portable restrooms would be temporarily installed on-site, construction is not anticipated to result in substantially elevated wastewater generation levels into the local sanitary sewer system.

Construction-related activities could potentially increase runoff events including increased runoff rates and volumes conveyed to local stormwater drainage facilities(Section 3.8, *Hydrology and Water Quality*). During construction the contractor would adhere to NPDES Permit requirements, implement best management practices (BMPs) to minimize runoff, adhere to the City's Stormwater Ordinance, and prepare a Stormwater Pollution Prevention Plan (SWPPP). This would reduce the potential for increased stormwater runoff.

As discussed in Section 3.8, *Hydrology and Water Quality*, of this EIR, construction activities would require dewatering. Dewatering is anticipated to be required during construction of several planned basements and subterranean parking structures in three of the four phases (Phases 1, 3 and 4 of project development). A construction dewatering analysis was conducted for the project (Appendix 3.8-2, *Groundwater Assessment*). The dewatering analysis grouped buildings by construction phase and construction activities which require the longest excavation duration and total excavation depths. Detailed construction dewatering plans were not available, therefore, construction dewatering volumes, discharge rates, and groundwater level changes at nearby sites due to construction dewatering were preliminarily estimated using project design information, geotechnical design groundwater elevations beneath the project, and representative aquifer parameters. Buildings constructed in Phase 1 under both Scenarios have the greatest potential for groundwater dewatering due to the greatest bottom of mat slab foundations compared to groundwater elevations. The maximum volume of groundwater removed during project construction would be approximately 10 acre-feet per year (AFY) (0.01 cubic feet per second [CFS]). Compared to the total existing peak storm drain flow of 44.95 CFS, dewatering discharge rates would be less than peak storm flows and would be within system capacity, as further described in Section 3.8, *Hydrology and Water Quality*, Impact HWQ-2. Therefore, this rate of dewatering is not expected to result in storm drain capacity exceedance issues because dewatering flows would be below system capacity. Further, development is subject to review by the County of San Mateo's Groundwater Protection Program and approved by inspection staff.

Based on the analysis above, project construction activities would not require the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities to serve construction activities, and impacts would be ***less than significant***.

NOTE: Per BKF Engineers, 4/15/2025



CONCEPTUAL GENERATOR LOCATIONS

CONCEPTUAL MECHANICAL ROOF EQUIPMENT LOCATIONS

Source: ARE-San Francisco No.96, LLC, 2025

ALEXANDRIA. Gensler

ICF

Figure 3.16-4a
Proposed Utility Improvements (North)

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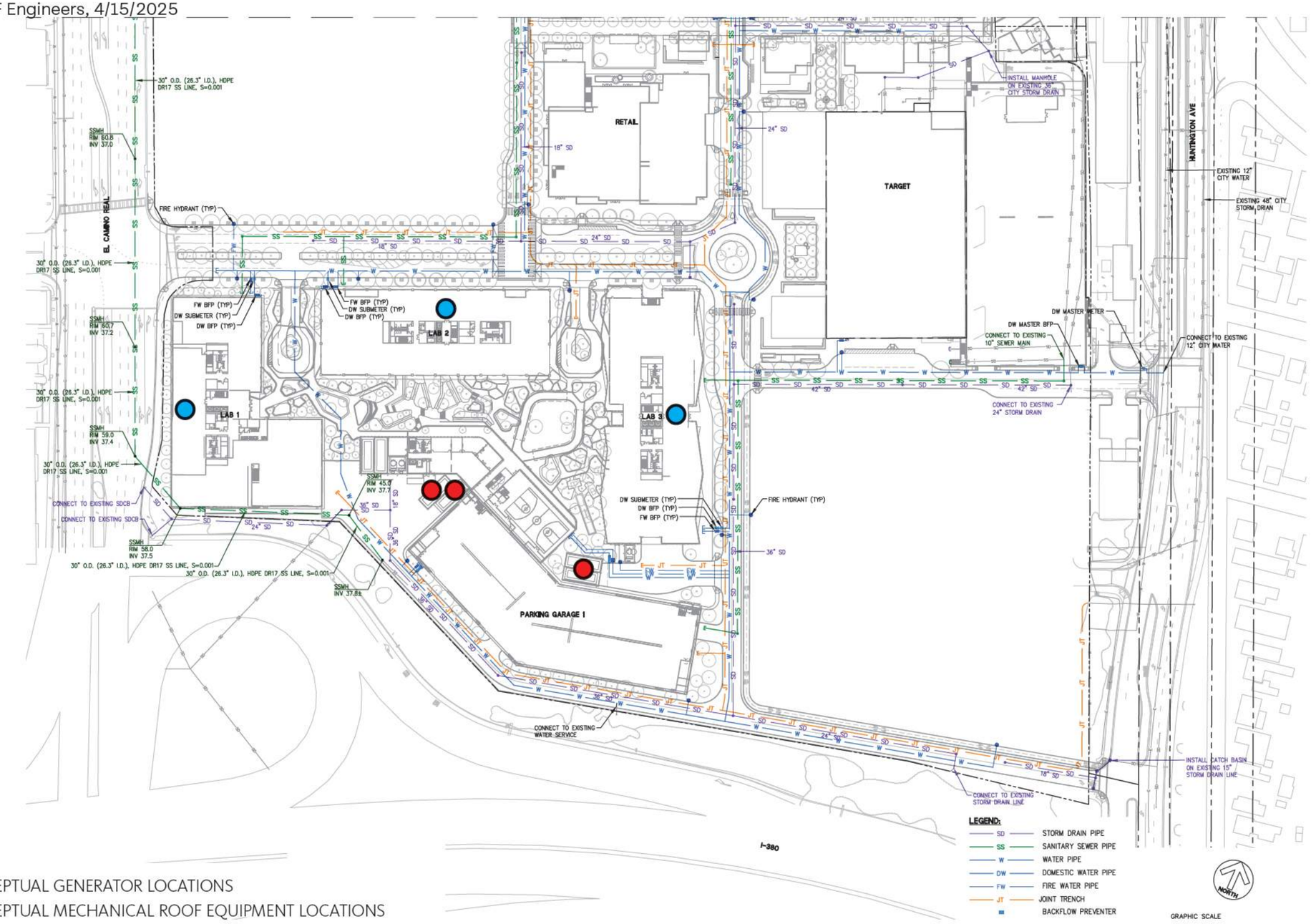
NOTE: Per BKF Engineers, 4/15/2025



CONCEPTUAL GENERATOR LOCATIONS

CONCEPTUAL MECHANICAL ROOF EQUIPMENT LOCATIONS

Source: ARE-San Francisco No.96, LLC, 2025

ALEXANDRIA. Gensler

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Figure 3.16-4b
Proposed Utility Improvements (South)

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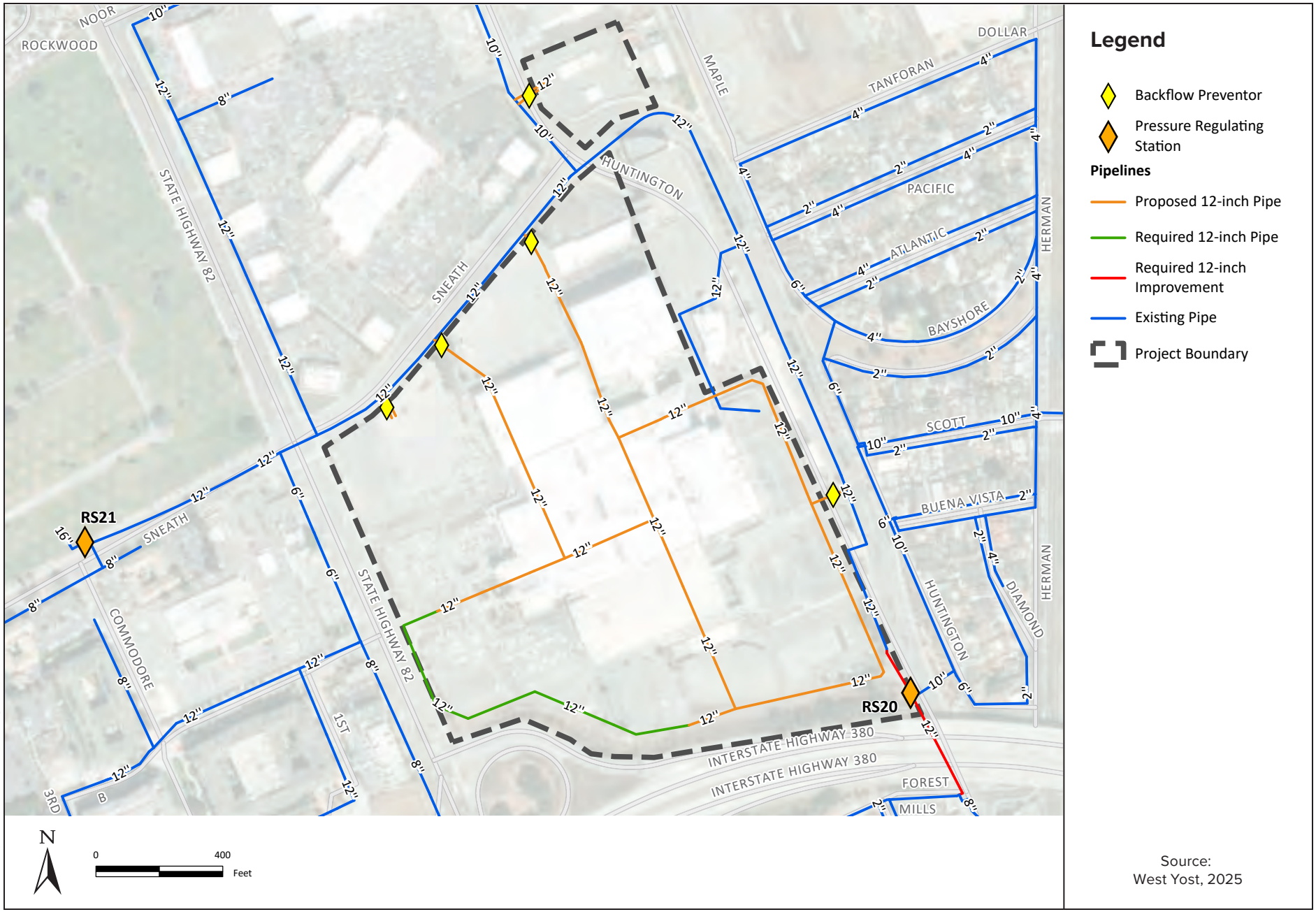

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Figure 3.16-5
Proposed Water Infrastructure Improvements

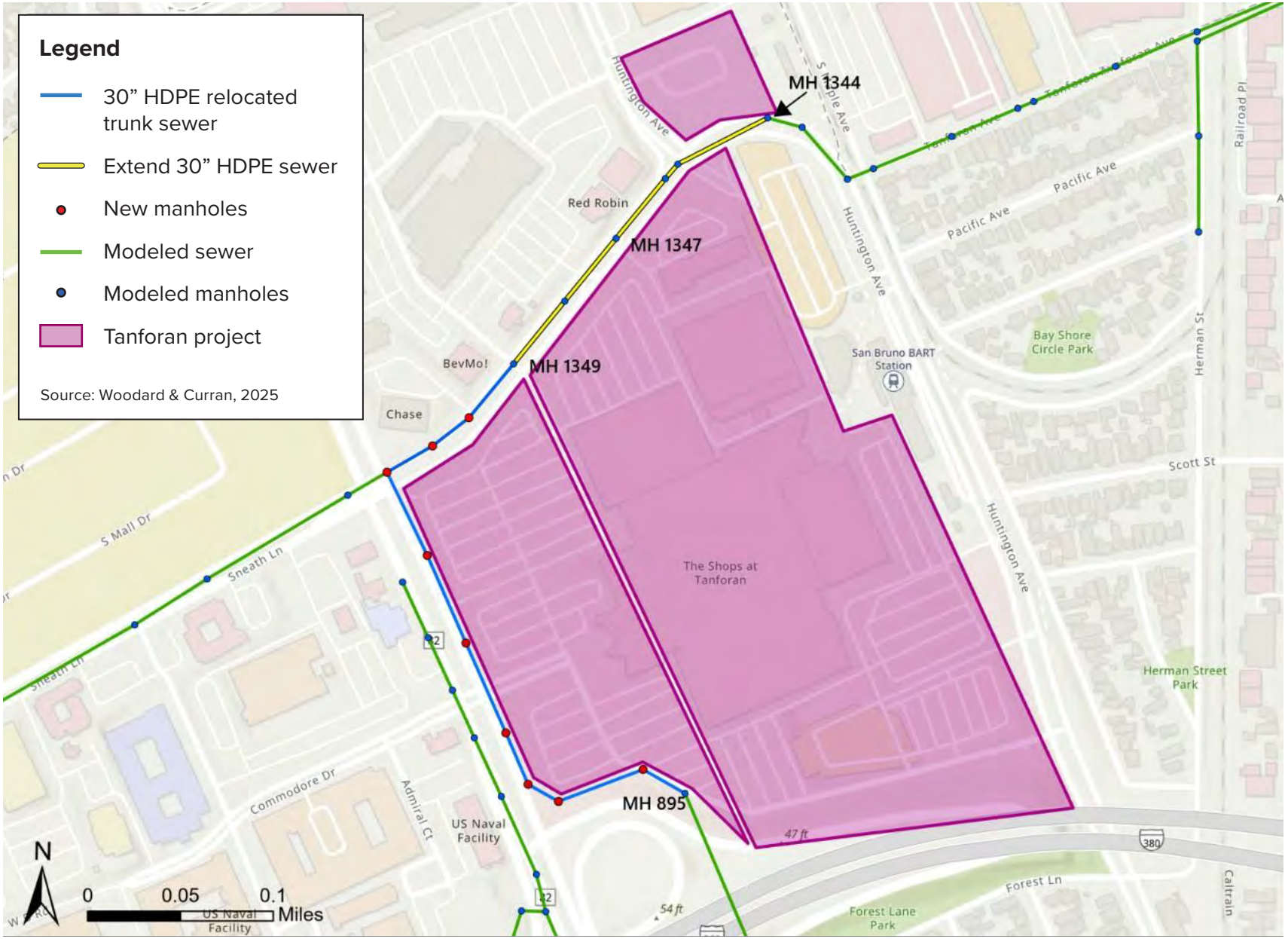

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Figure 3.16-6
Proposed Wastewater Infrastructure

Operation

Water Facilities

As shown in Table 3.16-5 and Figures 3.16-4a, 3.16-4b, and 3.16-5, the project would install a new on-site network of 12-inch water pipelines connecting to the existing 12-inch-diameter pipelines along Sneath Lane and Huntington Avenue. The Sneath Lane and Huntington Avenue would not require upsizing to supply the new water mains for the project.

The construction of the proposed water infrastructure improvements would have the potential to cause significant adverse environmental effects such as fugitive dust generation, noise generation, sedimentation, and erosion. The proposed utility expansions are a part of the project description, and the potential impacts that would result from construction of these facilities are evaluated throughout this EIR (Section 3.1, *Air Quality*; Section 3.8, *Hydrology and Water Quality*; and Section 3.10, *Noise and Vibration*). The project sponsor will also be required to obtain an Underground Service Alert request from SFPUC because SFPUC's Number 1 water transmission pipeline is within the El Camino Real Public Right-of-Way.

Appendix 3.16-2, *Water System Hydraulic Evaluation*, evaluates the sufficiency of the City's potable water system to serve the project's water demand. The analysis accounts for the proposed pipeline improvements identified in Table 3.16-5 and shown in Figures 3.16-4a, 3.16-4b, and 3.16-5, and shows that model-simulated system pressures for the project are above the minimum required pressure of 35 pounds per square inch (psi) and below the maximum allowable pressure of 80 psi during a peak hour demand condition. The pressures at the project's service connection points range from approximately 46 to 59 psi, which are within the allowable range.

Velocities in all existing and new Zone 1/4A pipelines near the project site would be below 4 feet per second (ft/s) during a peak hour demand condition. However, the 8-inch-diameter pipelines upstream and downstream of Pressure Regulating Station RS20 would have a velocity of approximately 5 to 6 ft/s, which exceeds the City's maximum pipeline velocity constraint of 4 ft/s. These high pipeline velocities occur because Pressure Regulating Station RS20 provides significant supply into Zone 1/4A to support the additional water demands from the project. Furthermore, according to the City's fire department, an additional 1,300 linear feet of 12-inch-diameter pipeline is required within the project site to provide looping and supply the hydrants located on the west side of the project site. For these reasons, impacts on water infrastructure would be significant.

To address on-site hydrant needs and high pipeline velocities, additional water infrastructure including the construction of expanded water facilities are required. With implementation of **Mitigation Measure UT-1-A**, Off-Site Water Facility Upgrades, pipeline velocities would not exceed the City's maximum pipeline velocity constraint of 4 ft/s. With implementation of **Mitigation Measure UT-1-B**, fire hydrants would be adequately supplied. Overall, the impact would be ***less than significant with mitigation***. The environmental impacts of expanded water facilities recommended in the mitigation measure are evaluated in Chapter 5, Section 5.3, *Secondary Impacts*.

With regard to water system storage capacity, there is an existing deficit of 0.24 million gallon in Zone 1/4, in which the project site is located. The City's 2022 WSMP identifies a 3.5-million gallon Tank 1 replacement project. Planning for the tank replacement project is currently 90 percent complete, and the project is expected to be completed prior to construction of the proposed project. The proposed project's water demands were included in the tank's buildout facility capacity evaluations, and the tank would be adequate to serve the buildout of Zone 1/4 inclusive of the proposed project. Impacts on water system storage capacity would be ***less than significant***.

Mitigation Measures

Mitigation Measure UT-1-A: Off-Site Water Facility Upgrades

In coordination with City of San Bruno Public Works, the project sponsor shall upsize the existing pipeline upstream and downstream of Pressure Regulating Station RS20 (along Huntington Avenue) to 12 inches in diameter (approximately 520 linear feet of pipeline) to address high pipeline velocities. The required improvement is shown in red in Figure 3.16-5.

The timing of implementing this mitigation measure shall be determined as follows. Prior to the issuance of each building permit allowing for vertical construction, the project sponsor shall pay for a phase-specific water demand and hydraulic analysis to be conducted by the City's water modeling consultant. This analysis shall evaluate whether the projected flow associated with the proposed building would cause pipeline velocities to exceed the City's design standard of 4 feet per second within the impacted segment of the water main shown in red in Figure 3.16-5.

If the analysis determines that the velocity threshold would be exceeded due to the proposed development phase, the project sponsor shall pay for the design and construction of the water main upsizing, as shown in red in Figure 3.16-5. This improvement shall be completed prior to the issuance of the Temporary Certificate of Occupancy for either the building that triggered the velocity requirement or any building permitted thereafter, whichever occurs first. Once the water main has been upsized in accordance with this measure, no further phase-specific modeling will be required for subsequent building permits. All modeling, designs, and required improvements shall be reviewed and approved by the City of San Bruno Public Works Department.

Mitigation Measure UT-1-B: On-Site Water Facility Upgrades

In coordination with City of San Bruno Public Works, the on-site water distribution system shall be designed and constructed to provide continuous looping at all times throughout project development, regardless of phasing. Looping shall ensure adequate supply, pressure, and fire protection coverage, including to hydrants located on the west side of the project site.

Wastewater Facilities

As shown in Table 3.16-5 and Figures 3.16-4a, 3.16-4b, and 3.16-6, the project would include construction of an on-site sewer system to serve the new buildings. The main on-site lines would generally run south to north and connect to the existing City trunk sewer in Sneath Lane at two locations intermediate between El Camino Real and Huntington Avenue. The City's existing 24-inch trunk sewer that currently runs through the project site would be relocated and routed to and along El Camino Real to Sneath Lane. No flow from the project would discharge into this relocated trunk sewer. The project would abandon the existing sewer through the project site and route a new sewer west along the southern boundary of the site, starting at its upstream connection point (assumed to be at City manhole 895), and then north along El Camino Real to Sneath Lane. The existing trunk sewer in Sneath Lane from El Camino Real to Seabiscuit Avenue (manhole 1349) would also be replaced as part of the project. The project proposes to install a 30-inch high-density polyethylene (HDPE) pipe.

The construction of the proposed wastewater infrastructure improvements would have the potential to cause significant adverse environmental effects such as fugitive dust generation, noise generation, sedimentation, and erosion. The proposed utility expansions are a part of the project

description, and the potential impacts that would result from construction of these facilities are evaluated throughout this EIR (Section 3.1, *Air Quality*; Section 3.8, *Hydrology and Water Quality*; and Section 3.10, *Noise and Vibration*).

Appendix 3.16-3, *Sewer Impact Study*, and Appendix 3.16-4, *Hydraulic Modeling Study*, evaluate the sufficiency of the local wastewater conveyance system to serve the project's estimated wastewater flow. The analysis evaluates pipeline capacity under peak wet weather flow, based on the model used in the City's Sewer Master Plan, under Scenario B. The analysis accounts for the proposed pipeline improvements identified in Table 3.16-5 and Figures 3.16-4a, 3.16-4b, and 3.16-6, and the project's projected wastewater demand.

Based on the model results, the total peak wet weather flow from the City conveyed in the Tanforan Avenue trunk sewer to the Shaw Road Pump Station would increase from 13.8 mgd under baseline conditions to about 14.5 mgd with the additional project flows under Scenario B (14.4 mgd under Scenario A). Average base wastewater flows would increase from 0.188 mgd under baseline conditions to 0.426 mgd and 0.458 mgd, for Scenario A and Scenario B, respectively. This is a maximum increase of about 0.27 mgd of base wastewater flow and an increase in the design storm peak wet weather flow of about 0.7 mgd. Due to this increase in wastewater flows, the throttle surcharge[3] in the 24-inch trunk sewer in Sneath Lane would be slightly more severe than under baseline conditions due to the increased flows from the project. The new 30-inch HDPE pipe would be surcharged for its entire length, with a predicted freeboard of about 3 feet at the upstream end. This would violate the City's Master Plan criteria for design of new sewers, which specify that pipes should be able to convey the future design storm peak wet weather flow with no (or minimal) surcharge. In this case, the predicted surcharge is due primarily to backwater from the existing 24-inch sewer in Sneath Lane. Therefore, additional wastewater infrastructure would be needed, resulting in the construction of expanded wastewater facilities, the construction of which would cause significant environmental effects. This impact would be significant.

In addition, the hydraulic modeling study analyzed sewer flows from the project on downstream sewer system capacity, including the capacity of South San Francisco wastewater infrastructure and the Shaw Road Pump Station. It indicated that the existing system is adequately sized to accommodate dry weather flows from the project. During wet weather conditions, the Shaw Road Pump Station has an existing deficiency of 16.6 mgd. To address the deficiency, sewage is currently allowed to temporarily backwater/surcharge within the upstream collection system in Tanforan Avenue and Montgomery Avenue, where it is held until conditions allow for flows to redirect back to the pump station. When this occurs under existing conditions, the freeboard depth at Tanforan Avenue and Montgomery Avenue decreases from 3.0 feet to 2.2 feet due to the backwater effect caused by the capacity constraint, satisfying the City of South San Francisco's 1-foot freeboard requirement. According to the hydraulic modeling study, with the addition of project flows, the freeboard depth at the critical manhole would decrease from 3.0 feet to 1.6 feet, still meeting the City of South San Francisco's 1 foot freeboard requirement. Thus, wet weather flows would be attenuated in the upstream pipelines under the project, and impacts on off-site infrastructure in South San Francisco would be ***less than significant***.

[3] Surcharging happens when the amount of wastewater flowing through a sewer pipe exceeds the pipe's capacity, leading to a backup of wastewater in the system.

With implementation of **Mitigation Measure UT-1-C**, the wastewater system would have adequate capacity to serve the project, and impacts on San Bruno infrastructure would be ***less than significant with mitigation***. The environmental impacts of expanded water facilities recommended in the mitigation measure are evaluated in Chapter 5, Section 5.3, *Secondary Impacts*.

Mitigation Measures

Mitigation Measure UT-1-C: Wastewater Facility Upgrades

In coordination with City of San Bruno Public Works, prior to the issuance of a certificate of occupancy of the first new building, the project applicant shall construct the following improvement to ensure compliance with San Bruno's design criteria .

- Extend the proposed 30-inch HDPE sewer in Sneath Lane downstream from Seabiscuit Lane (manhole 1349) to Huntington Avenue (manhole 1344), totaling approximately 1,022 feet. The required improvement is shown in yellow on Figure 3.16-6 of the Tanforan Redevelopment Project EIR. (between manholes 1344 and 1349).

Stormwater Drainage Facilities

As described in greater detail in Section 3.8, *Hydrology and Water Quality*, the project would result in an estimated 0.8 acre (approximately 30 percent) increase in pervious surface on the project site, under both Scenario A and Scenario B, through implementation of new landscaping and other improvements. This would reduce flows to the storm drain system from the project site compared to existing conditions.

Notwithstanding the overall reduction in stormwater flow volumes that would occur, the project includes improvements to the storm drain system, as shown in Table 3.16-5 and Figures 3.16-4a and 3.16-4b.

The construction of the proposed stormwater infrastructure improvements would have the potential to cause significant adverse environmental effects such as fugitive dust generation, noise generation, sedimentation, and erosion. The proposed utility expansions are a part of the project description, and the potential impacts that would result from construction of these facilities are evaluated throughout this EIR (Section 3.1, *Air Quality*; Section 3.8, *Hydrology and Water Quality*; and Section 3.10, *Noise and Vibration*).

Stormwater runoff from the project site would be captured and treated on-site using LID measures including site design, pollutant source control, stormwater treatment and flow control measures. LID treatment measures may include "capture and reuse" or rainwater harvesting, infiltration, and bioretention areas. Stormwater would be treated per San Mateo County C.3 requirements, prior to discharge to the storm drain system, described above.

Scenario A and Scenario B would include approximately nine bioretention areas. Each bioretention area would be lined with an underdrain and would be sized based on the flow-based sizing criteria. Portions of the project site would be also developed with landscaped areas. Landscape design would minimize stormwater runoff and promote surface filtration. For compliance with the MRP (Provision C.3.j), the City has adopted a Green Infrastructure Plan. The Green Infrastructure Plan addresses long-term measures for the inclusion of vegetated or green landscape into public rights-of-way and public properties in addition to private developments. The MRP requires green landscape in public and private properties to capture stormwater from paved surfaces such as

roads, parking lots and other areas where stormwater collects pollutants, which would otherwise be conveyed to San Francisco Bay. Green infrastructure also reduces runoff rates and volumes and allows infiltration of stormwater for groundwater recharge. LID treatment methods and compliance with the Green Infrastructure Plan guidelines and other stormwater management requirements would be applied to the project. Potential LID measures for the project, which are required per Provision C.3 of the MRP, include rainwater harvesting and reuse for nonpotable water uses. Additionally, sustainable landscaping would be incorporated to minimize runoff, promote infiltration and reduce contamination from pesticides and fertilizers.

As discussed in Section 3.8, *Hydrology and Water Quality*, on-site drainage areas would be resized. Based on best available information for the existing drainage system, approximately 3.6 acres of drainage area would shift from Huntington Avenue to Sneath Lane under proposed conditions. As a result of the shift in drainage areas under proposed conditions, the storm drain mains on Huntington Avenue are predicted to experience a decrease in peak flow of 5.3 cubic feet per second (cfs) (13 percent) and a decrease in total volume of 0.952 million gallons (22 percent). Conversely, the storm drain mains on Sneath Lane are predicted to experience an increase in peak flow of 3.6 cfs (67 percent) and an increase in total volume of 0.284 million gallons (47 percent), based on the contributing drainage area and inflow rate and volume, respectively. The storm drain mains along Sneath Lane range from 16 inches to 24 inches in diameter at the Tanforan connection points (Appendix 3.8-1, *Storm Drain System Capacity Study*). Drainage design would match the existing discharge locations and flow rates and volumes as much as possible. Any increase in peak flow would be detained on-site and metered at the existing discharge rate in the final design. The design of the on-site detention and flow metering would be reviewed by Public Works prior to the issuance of construction permits. Although the area has not previously experienced drainage capacity concerns and the additional flow is not expected to cause substantial flooding issues, the increase in stormwater peak flows and total volume is notable. Implementation of **Mitigation Measure HWQ-3**, which requires a site survey to verify existing drainage capacity, would reduce this impact.

Therefore, the project would not require or result in the relocation or construction of new or expanded stormwater facilities beyond the facilities already included in the project description and evaluated in this EIR, the construction or relocation of which could cause significant environmental effects. This impact would be ***less than significant with mitigation***.

Mitigation Measures

Mitigation Measure HWQ-3: Require a Site Survey To Verify Existing Drainage Capacity.

Refer to Section 3.8, *Hydrology and Water Quality*.

Electricity, Natural Gas, and Telecommunications Facilities

The utility providers for the project site would be PCE and PG&E for electricity and City Net Services and AT&T for telecommunications service. No use of natural gas is anticipated for the project as buildings would be all electric. Implementation of the project would increase the demand for electricity and telecommunications services at the project site. The total electricity demand for the project at full buildout is about 110,000,000 kilowatt hours per year (kWh/year) for Scenario A and 70,000,000 kWh/year for Scenario B. To meet this demand, the project would install new connections to the surrounding PG&E electric grid to provide service to future buildings throughout the project site.

Demand for telecommunications would also increase due to increased density and from the transition from a shopping center to a mixed-use development, which generally have greater demand for technology services. To meet this demand, the project would install new connections to the surrounding communication lines along adjacent roadways. The project does not propose major upgrades to electricity and telecommunications infrastructure serving the project site.

In addition, the sustainability measures incorporated into the project would reduce energy use. The project would achieve Leadership in Energy and Environmental Design (LEED) Gold certification standards for life-science buildings. Examples of the proposed sustainability measures include all electric buildings with lighting and the heating, ventilation, and air conditioning (HVAC) systems, and other mechanical systems, designed around maximizing energy efficiency using heat recovery systems, efficient building systems with variable exhaust or wind responsive exhaust, reductions in lighting power density, air change setbacks, and high-performance envelopes. Exterior environmental elements proposed are increased trees and plantings to support the local environment, incorporation of on-site renewables (photovoltaic systems) on parking garages and other large roof surfaces. Other exterior design sustainability measures are elements that would create shade and wind protection. Increased energy efficiency measures would exceed California energy efficiency standards (Title 24, Part VI of the California Energy Code). The project targets a 40 percent reduction in indoor water use through the installation of efficient-flow and flush building fixtures, smart metering, leak detection systems and water reuse for low-maintenance, drought tolerant landscaping, and implementation of other water efficiency strategies throughout the site.

The construction of the proposed electricity and telecommunications infrastructure improvements incorporated within the project and associated ground disturbing activities would have the potential to cause significant adverse environmental effects such as fugitive dust generation, noise generation, sedimentation, and erosion. The proposed utility expansions are a part of the project description, and the potential impacts that would result from construction of these facilities and associated ground disturbing activities are evaluated throughout this EIR (Section 3.1, *Air Quality*; Section 3.8, *Hydrology and Water Quality*; and Section 3.10, *Noise and Vibration*). Based on the analysis above, the project would not require or result in the relocation or construction of new or expanded electric and telecommunications facilities beyond the facilities already included in the project description and evaluated in this EIR, the construction or relocation of which could cause significant environmental effects. This impact would be ***less than significant***.

Impact UT-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).

Table 3.16-6 describes anticipated operational water uses associated with the project. Water demands were estimated based on standard unit demand factors as described in the project's WSA, which is included in Appendix 3.16-1, *Water Supply Assessment*. As shown in Table 2-4 of the WSA, Scenario B (Residential Scenario) would generate a greater demand for water than Scenario A (R&D Scenario) (0.45 mgd compared to 0.43 mgd); therefore, this analysis assumes buildout of the Scenario B.

As shown in Table 3.16-6, the project site, inclusive of existing demands, would require up to approximately 0.45 MGD of water, representing a net increase in water use of 0.38 MGD when compared to existing uses on the project site.

Table 3.16-6. Estimated Water Demand for the Project (Scenario B)

Land Use Type	Quantity	Units	Unit Demand Factor	Units	Projected Water Demand		
					gpd	mgd	CCF/YR
Commercial Retail	477,321	sf	0.19	gpd/square foot	90,691	0.09	44,251
Commercial Office	1,229,000	sf	0.13	gpd/square foot	159,770	0.16	77,957
Multifamily Residential	1,514	du	120	gpd/du	181,680	0.18	88,648
Hotel	170	room	120	gpd/room	20,400	0.02	9,954
Maximum Residential Total					**452,541**	**0.45**	**220,810**
Existing Demand at Proposed Project Site					**68,377**	**0.07**	**33,363**
Net Increase in Demand for Proposed Project					**384,164**	**0.38**	**187,447**

Source: West Yost Associates 2025.
sf = square feet; du = dwelling unit; gdp = gallons per day; mgd = million gallons per day; CCF/YR = hundred cubic feet/year

The estimated project demand shown in Table 3.16-6 is also conservative because it does not account for the project's numerous sustainability features that would reduce water consumption. The project would meet the U.S. Green Building Council's LEED Gold certification standards for life-science buildings and target a 40 percent reduction in indoor water use through the installation of efficient-flow and flush building fixtures, smart metering, leak detection systems and water reuse for low-maintenance, drought tolerant landscaping, and implementation of other water efficiency strategies throughout the site.

Table 3.16-7 summarizes the projected availability of the City's existing and planned future water supplies and the City's projected water demands in normal, single dry, and multiple dry years through 2045. There is sufficient supply to meet projected demands in normal years. However, the City's water supplies are not adequate to meet projected demands in single dry years and multiple dry years. Supply shortfalls, ranging from 5 to 19 percent in the first year of the 5-year dry period to 2 to 24 percent in the fifth year of the 5-year dry period, are projected. This shortfall is primarily due to potential significant cutbacks in the City's supply from SFPUC, which may be significantly reduced in dry years due to the Bay-Delta Plan Amendment.

Table 3.16-7. Summary of Water Demand versus Supply During Normal, Single Dry, and Multiple Dry years (Scenario B)

	Supply and Demand Comparison (mgd)				
Year Type	**2025**	**2030**	**2035**	**2040**	**2045**
Normal Year					
Available Potable Water Supply [a]	5.39	5.37	5.35	5.35	5.36
Total Water Demand [b]	3.53	3.95	4.37	4.78	4.78
Surplus (Deficit)	1.86	1.42	0.98	0.57	0.58
Percent Shortfall	--	--	--	--	--
Single Dry Year					
Available Potable Water Supply [a]	4.20	4.18	4.16	4.16	3.88
Total Water Demand [b]	3.53	3.95	4.37	4.78	4.78
Surplus (Deficit)	0.67	0.23	(0.21)	(0.62)	(0.90)
Percent Shortfall	--	--	**5%**	**13%**	**19%**
Multiple Dry Year 1					
Available Potable Water Supply [a]	4.20	4.18	4.16	4.16	3.88
Total Water Demand [b]	3.53	3.95	4.37	4.78	4.78
Surplus (Deficit)	0.67	0.23	(0.21)	(0.62)	(0.90)
Percent Shortfall	--	--	**5%**	**13%**	**19%**
Multiple Dry Year 2					
Available Potable Water Supply [a]	3.90	3.89	3.87	3.87	3.88
Total Water Demand [b]	3.53	3.95	4.37	4.78	4.78
Surplus (Deficit)	0.37	(0.06)	(0.50)	(0.91)	(0.90)
Percent Shortfall	--	**2%**	**11%**	**19%**	**19%**
Multiple Dry Year 3					
Available Potable Water Supply [a]	3.90	3.89	3.87	3.87	3.88
Total Water Demand [b]	3.53	3.95	4.37	4.78	4.78
Surplus (Deficit)	0.37	(0.06)	(0.50)	(0.91)	(0.90)
Percent Shortfall	--	**2%**	**11%**	**19%**	**19%**
Multiple Dry Year 4					
Available Potable Water Supply [a]	3.90	3.89	3.87	3.66	3.61
Total Water Demand [b]	3.53	3.95	4.37	4.78	4.78
Surplus (Deficit)	0.37	(0.06)	(0.50)	(1.12)	(1.17)
Percent Shortfall	--	**2%**	**11%**	**23%**	**24%**
Multiple Dry Year 5					
Available Potable Water Supply [a]	3.90	3.89	3.73	3.66	3.61
Total Water Demand [b]	3.53	3.95	4.37	4.78	4.78
Surplus (Deficit)	0.37	(0.06)	(0.64)	(1.12)	(1.17)
Percent Shortfall	--	**2%**	**15%**	**23%**	**24%**

Source: West Yost Associates 2025.

[a] Totals assume implementation of the Bay-Delta Plan Amendment.

[b] It is conservatively assumed no reduction in water demand in dry years, consistent with the City of San Bruno's 2020 UWMP.

mgd = million gallons per day

To remain conservative, projected demands were not reduced in dry years. In years with a supply shortfall, the City can implement its WSCP to reduce demand to the level of available supply. The City prepares an annual assessment and Annual Water Shortage Assessment Report. Based on the findings of the annual assessment, the City determines if a water shortage condition exists and, if needed, adopts a resolution declaring a water shortage emergency and authorizes water shortage actions. To plan for current year and future year supplies and demands, the annual assessment considers the key inputs such as hydrological conditions, regulatory conditions, contractual constraints, surface water and groundwater quality conditions, groundwater well production limitations, infrastructure capacity constraints or changes, and capital improvement projects implementation. The WSCP stages required to achieve the necessary demand reductions range from Stage 1 to Stage 3. A maximum demand reduction of 30 percent can be achieved by implementation of Stage 3 of the City's WSCP.[4] The shortage response actions for Stage 2 include implementation of mandatory water allotments for all accounts, increasing intensity of public outreach, increasing monitoring of water use, and increasing rates and penalties for excess water use (West Yost Associates 2021). During the recent drought in 2015 to 2016, the "conservation standards for the individual Bay Area Water Supply & Conservation Agency (BAWSCA) agencies ranged from 8 percent to 36 percent, assigned based on each agency's residential per capita water use in summer 2014. During the 12-month period for which the mandatory conservation standards were in effect, all of the BAWSCA member agencies met their conservation standards. BAWSCA agencies reduced potable water use by 27 percent as compared to 2013, collectively saving 23 billion gallons of water (166 percent of their savings target)." San Bruno's assigned conservation standard was about 8 percent, and the achieved reduction between June 2015 and May 2016 was 24 percent, far exceeding the conservation standard (BAWSCA 2017).

In the event of a catastrophic supply interruption, the response procedures that the City would follow are described in the SFPUC Emergency Operations Plan, San Mateo County Emergency Operations Plan, and the City of San Bruno Emergency Response Plan. Actions described in these plans focus on maintaining flow within the regional and local water system pipelines. If this water is unsafe for consumption (e.g., only available for fire flow), the City plans to distribute potable water to residents at emergency distribution centers. If an emergency were to occur, or if drought conditions occurred, requiring the City to implement its WSCP, all City customers, including those within the project, would be subject to the same water conservation measures and water use restrictions.

Actions that the SFPUC is taking in response to a potential water supply shortage are expected to minimize the water supply shortage by some, as yet unquantified, amount. Therefore, the water supply and demand summary provided in Table 3.16-7 is the worst-case water supply conditions for the City (i.e., full implementation of the Bay-Delta Plan Amendment without mitigating actions).

It should be noted that without the Bay-Delta Plan Amendment, supply shortfalls would be nearly eliminated. The only anticipated supply shortage would be less than 1 percent in the fourth and fifth dry years of the 5-year dry period in 2045.

Therefore, in years with a supply shortfall, the City can implement its WSCP to reduce demands to the level of available supply. With implementation of the WSCP and other water conservation measures and water use restrictions, the impact on water supply would be ***less than significant***.

[4] As included in the 2020 UWMP, the Water Shortage Contingency Plan includes six water shortage stages (Stages 1–6) to align with the state's six standard water shortage levels. Each stage corresponds to progressive ranges of up to 10, 20, 30, 40, 50 percent, and greater than 50 percent shortages from the normal supply condition.

Impact UT-3: The project would not result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected wastewater treatment demand in addition to the provider's existing commitments. (Less Than Significant).

As discussed under Impact UT-1, the project would increase wastewater demand within the project site due to the intensification of land uses within the project site boundary. Appendix 3.16-4, *Hydraulic Modeling Study,* determined that under peak flow conditions, Scenario B would generate a greater demand for wastewater than Scenario A; therefore, this analysis assumes buildout of Scenario B. As shown in Table 3.16-8, under Scenario B, the project would generate an average dry weather flow of approximately 0.46 mgd, a peak dry weather flow of approximately 0.72 mgd, and a peak wet weather flow of approximately 1.37 mgd.

Table 3.16-8. Summary of Sewer Flow Projections (Scenario B)

			Average Dry Weather Flow [a]		Peak Dry Weather Flow [c]		Peak Wet Weather Flow [d]	
Land Use	**Total Buildout (sf)**	**% of Total Buildout**	**Unit Flow Factor [b]**	**MGD**	**Peaking Factor relative to ADWF**	**MGD**	**Peaking Factor relative to ADWF**	**MGD**
Retail	477,321	14	190 gpd/ 1,000 sf	0.091	1.57	0.142	3.00	0.272
Residential	1,550,000 (1,514 units)	46	120 gpd/ dwelling unit	0.182	1.57	0.285	3.00	0.545
Life-Science Lab and Office	1,229,000	36	130 gpd/ 1,000 sf	0.160	1.57	0.251	3.00	0.479
Hotel	125,000 (170 rooms)	4	150 gpd/ room	0.026	1.57	0.040	3.00	0.077
Total	**3,381,321**	**100**		**0.458**		**0.718**		**1.373**

Source: Akel Engineering 2025.

[a] Based on total buildout square footage.

[b] From the City's 2014 Sewer Master Plan.

[c] Based on City Peaking Factor of 1.57.

[d] Based on City Peaking factor of 3.00.

sf = square feet; MGD = million gallons per day; ADWF = average dry weather flow

Regarding treatment capacity, the WQCP has sufficient capacity available to provide wastewater treatment for the proposed peak wet weather flows for the project, approximately 1.37 mgd. Furthermore, the WQCP currently treats approximately 7 mgd of wastewater under average dry weather flow conditions, a quantity substantially below its dry weather peak flow capacity of 13 mgd. The WQCP also operates below its 62 mgd treatment capacity for wet weather flow conditions, with peak wet weather flows of 60 mgd, and is currently undergoing facility improvements, including installation of a new storage basin to retain excess flows and increase treatment capacity during wet weather conditions (City of South San Francisco 2022). Therefore, the WQCP has sufficient capacity to treat the project's approximately 1.37 mgd of wastewater. The project's water conservation policies noted above in Impact UT-2 could also result in proportionate reductions in the project's wastewater generation. However, since these measures are not mandated, they are not factored into this analysis. Based on the above, project-related operational impacts on wastewater treatment capacity would be ***less than significant***.

Impact UT-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. In addition, the project would not fail to comply with federal, state, and local management and reduction statutes and regulations related to solid waste. (Less Than Significant).

Construction

Project construction would result in a short-term generation of solid waste. Solid waste would consist of demolition debris as well as debris from construction activities. However, CALGreen requires that at least 65 percent of all debris from demolition of any commercial building be diverted from landfills via recycling, salvage, and other similar programs. Any demolition and construction debris remaining after recycling would then be transported to the Corinda Los Trancos (Ox Mountain) Sanitary Landfill or another nearby landfill. The Ox Mountain Sanitary Landfill had a remaining capacity of approximately 17,240,000 cubic yards (CalRecycle 2025b). The project proposes demolition of 785,489 square feet of building area, which would generate an estimated 385,296 pounds of solid waste.[5] Thus, the solid waste generated by demolition of construction debris from the project would represent a very small amount of the remaining capacity at this landfill. Therefore, it is expected that through adherence to regulatory requirements, construction waste associated with the project that would be disposed of at landfills would be substantially reduced, and impacts would be ***less than significant***.

Operation

Development within the project site would result in increased site occupancy when compared to current conditions, subsequently increasing the amount of operational solid waste that would be generated within the project site. CalRecycle provides solid waste generation rates for residential uses on a per capita basis and nonresidential uses on a per-employee basis. As described in Section 3.16.3.3, Buildout Scenario Evaluated, above, Scenario A is evaluated here as the worst-case scenario, with a maximum of 2,478 net new employees and 2,690 net new residents. Scenario A is the worst-case because the solid waste generation rate for employees is more than double the rate for residents, and Scenario A results in more employees than the Scenario B. Though the project would also result in indirect population growth within both the City and other nearby jurisdictions, it would be speculative to presume the exact quantities of solid waste that this indirect population would generate, and to which landfills their solid waste would be transported; solid waste generated by indirect population growth is therefore not included in this analysis. The estimated net new project-related operational solid waste generation, assuming Scenario A, is displayed in Table 3.16-9, according to the most recent solid waste diversion rates and per-employee/per-resident solid waste generation rates for the City provided by CalRecycle.

[5] California Emissions Estimator Model (CalEEMod), version 2022.1.

Table 3.16-9. Estimated Solid Waste Generation for the Project (Scenario A)

Net New Employees/ Residents	Disposal Rate [a] (lbs/capita/day)	Net New Daily Solid Waste Generation (tons)	Net New Annual Solid Waste Generation (tons) [b, c]
2,690 residents	3.3	4.4	1,606.0
2,478 employees	8.8	10.9	2,844.9
Total	**--**	**15.3**	**4,450.9**

Source: CalRecycle 2025a

[a] Solid Waste generation rates are based on the 2023 generation rates identified by CalRecycle for the City (3.3 pounds per capita per day for residents and 8.8 pounds per capita per day for employees).

[b] Assumes 261 working days per year.

[c] Solid waste generation totals in this table do not account for any recycling that would be required by the project applicant as part of applicable regulations.

lbs/capita/day = pounds per capita per day; lbs = pounds

As displayed in Table 3.16-9, under Scenario A, the project is estimated to generate 15.3 tons per day, or 4,450.9 tons, of solid waste annually. Combined with 2023 City of San Bruno solid waste disposal quantities (25,743.44 tons), this would result in a total quantity of approximately 30,194.34 annual tons including solid waste quantities that are currently generated citywide (CalRecycle 2025a). These solid waste generation rates do not account for any recycling/waste diversion that would be required by the project under applicable regulations.

The San Bruno Transfer Station is capable of processing and redistributing up to 768 tons per day of solid waste. Based on the City's 2023 total solid waste generation of 25,743.44 tons, the San Bruno Transfer Station currently processes and redistributes approximately 71 tons of City solid waste daily.[6] Incorporating anticipated project prediversion solid waste generation quantities of approximately 15.3 daily tons of solid waste into this value, with project implementation the City of San Bruno would direct approximately 86 daily tons of solid waste for processing and redistribution at the San Bruno Transfer Station. Thus, the transfer station would have sufficient capacity to receive, process, sort, and re-distribute project-generated operational solid waste.

Most solid waste generated by the City is brought from San Bruno Transfer Station to Corinda Los Trancos Landfill, which has a remaining capacity of 17,240,000 cubic yards and is permitted for continued service through 2034. This capacity is sufficient to support project solid waste disposal needs through 2034 or facility closure. Therefore, impacts would be ***less than significant***.

[6] This value was calculated based on the City of San Bruno's 2023 total solid waste generation of 25,743.44 tons, which, divided by 365 days per year, equates to approximately 71 daily tons of solid waste that is sorted and transferred through the San Bruno Transfer Station.

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Chapter 4
Alternatives

4.1 Introduction

4.1.1 CEQA Requirements for Alternatives Analysis

According to Section 15126.6 of the California Environmental Quality Act (CEQA) Guidelines, an environmental impact report (EIR) must describe and evaluate a reasonable range of alternatives to a project or project location that would feasibly attain most of the basic project objectives and would avoid or substantially lessen any identified significant environmental impacts of the project. An EIR is not required to present the alternatives analysis in the same level of detail as the assessment of the project, and it is not required to consider every conceivable alternative to a project. Rather, an EIR must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making. Additionally, the EIR must analyze a no project alternative and must identify the environmentally superior alternative other than the no project alternative.

4.1.2 Project Objectives

As noted in Chapter 2, *Project Description*, of this Draft EIR, the underlying purpose of the project is to redevelop the 44-acre project site with an economically viable development that combines residential uses, community-serving retail uses, and employment opportunities near transit and freeway access.

Other objectives of the project include the following.

- Plan and develop a high-quality mixed-use redevelopment and revitalization of the Shops at Tanforan site.
- Provide a mix of uses including commercial office uses, research and development uses, residential uses, commercial retail uses, and/or a hotel use, and a mix of open space including publicly accessible open space, in a transit-oriented, urban infill location.
- Incorporate flexibility in the plan's phasing and buildout that would be accomplished through flex zones that allow for different mixes of uses resulting in a project that is responsive to tenant, customer, and expected user demands based on market conditions.
- Develop the site at an intensity and density that takes advantage of the transit resources in the area and allows the project to remain financially feasible while delivering onsite affordable housing, open space, community-serving retail and other public benefits and community amenities.
- Create a development plan that accommodates existing long-term ground-lease tenants.
- Establish vibrant gathering spaces and connected retail spaces to encourage neighborhood-serving retail, that provide shopping, eating and relaxing opportunities to residents and tenants of the project, as well as the larger San Bruno community.

- Increase the City of San Bruno's housing supply in support of its Regional Housing Needs Allocation (RHNA) obligations, through the creation of a mixed-use, mixed-income community that includes a minimum of approximately 1,000 residential units, consistent with the City of San Bruno's Housing Element, and a mix of market-rate and below-market-rate units.
- Create vibrant, state-of-the-art research and development and office facilities that support additional job growth, enhance property values, and generate property tax and development fees.
- Contribute to increased community recreation, and multi-modal connectivity through inclusion of on-site privately-owned, publicly accessible open spaces while enhancing linkages to the community's pedestrian and bicycle network, and improved pedestrian access to the San Bruno BART station.
- Produce high-quality architectural and landscape design that encourages variety and authenticity as well as compatible and or complementary with its surrounding context and will contribute to the San Bruno community.
- Create a transit-oriented development that is committed to sustainable design and programming through its transportation demand management, efficient building systems, and use of environmentally conscious construction materials and methods.
- Create a thriving mixed-use, transit-oriented project that locates housing near jobs and existing transit corridors and public transportation facilities that includes off-street parking for residential, retail, and office and research and development uses to meet the project's needs.
- Celebrate the site's history by providing for the appropriate relocation of historic and cultural elements.
- Create a cohesive campus-like environment by providing sufficient space for tenants to employ key scientific and business personnel in proximity to each other to foster efficient collaboration and productivity.
- Provide a development and infrastructure plan that can be built in phases to best respond to market demand and changing conditions.

4.1.3 Significant Impacts of the Project

Based on the analysis provided in Chapter 3, *Environmental Impact Analysis*, of this Draft EIR, the project would have the following significant and unavoidable impacts.

Impact AQ-3: Health Risks from Toxic Air Contaminants (TACs). The project would result in the exposure of sensitive receptors to substantial TAC concentrations from the combined effects of construction and operation.[1]

The project would result in the exposure of sensitive receptors to substantial TAC and criteria pollutant concentrations during construction and operation. Construction activities associated with the project would generate diesel particulate matter (DPM) and particulate matter with a diameter of 2.5 microns or less (PM2.5) that could expose adjacent receptors to significant health risks.

[1] As discussed in Section 3.1, *Air Quality*, the threshold language in Appendix G of the CEQA Guidelines, which is evaluated in the analysis, is: "Would the project expose sensitive receptors to substantial pollutant concentrations?" Additional language is included here to provide context for the significant impact.

Similarly, onsite receptors would experience a significant PM2.5 impact from exhaust and fugitive dust emissions. The causes of the cancer risk threshold exceedance for onsite receptors are from future residential receptors being exposed to DPM during construction at the site and then to TACs for nearly 30 years during operations, specifically DPM from generator testing and truck traffic and laboratory-related TACs from onsite laboratory uses. The primary causes of the PM2.5 concentration exceedances are onsite off-road equipment activity, earthmoving activities, and vehicle travel during construction, which generates fugitive PM2.5 from resuspended road dust. Thus, the health risk results and PM2.5 concentrations would exceed the Air District's thresholds after the incorporation of **Mitigation Measures AQ-2-A**, **AQ-2-B**, **AQ-2-C**, **AQ-2-D**, and **AQ-3-A** and the project would result in a significant and unavoidable impact with respect to health risks and PM2.5 impacts. Therefore, even with mitigation, this would result in a ***significant and unavoidable*** impact.

Impact NOI-1-A: Non-Daytime Construction Noise. Project construction would generate 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.

Construction noise from concrete pour activities during non-daytime hours was modeled to be in excess of the applicable City of San Bruno criterion for nighttime construction noise (i.e., 60 A-weighted decibels [dBA] at 100 feet from the noise source between 10:00 p.m. and 7:00 a.m.). **Mitigation Measure NOI-1-A** requires the development of a Construction Noise Control Plan for nighttime construction, which would include specific measures to reduce noise from non-daytime construction activity (e.g., locating equipment as far as possible from noise-sensitive uses, equipping equipment with mufflers and sound control devices to reduce noise). While this mitigation measure would reduce construction noise effects, it may not be possible to reduce noise levels during all non-daytime construction activities to less-than-significant levels. In addition, because construction activities would occur during non-daytime hours for an estimated 100 days during project construction, the frequency of the nighttime construction noise would be somewhat substantial. **Mitigation Measure NOI-1-B** requires the installation of a temporary construction noise barrier along the length of the project construction site near residential uses before nighttime construction activities take place within 500 feet of those residential uses . While the installation of such a barrier would reduce noise from construction activities, the barrier may not reduce noise levels from all concrete pour activities to below the applicable significance criterion levels, even if noise is somewhat reduced. Therefore, even with mitigation, this would result in a ***significant and unavoidable*** impact.

Impact C-NOI-1: Cumulative Non-Daytime Construction Noise. The project, in combination with past, present, and reasonably foreseeable future projects, would result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in a local general plan or noise ordinance or applicable standards of other agencies.

It is possible that future cumulative projects within 1,000 feet of the project site may require construction activities outside standard daytime hours. Of note, according to the Final EIR prepared for the Southline project (State Clearinghouse No. 2020050452), nighttime concrete pours are anticipated as part of that project. While Phase 1 of the Southline project is nearly complete at the time of this EIR analysis, construction of future phases could overlap with construction of the project. Therefore, for the reasons stated under Impact NOI-1-a, and given the potential for non-

daytime construction for the project to occur concurrently with that of other nearby projects, particularly the Southline project, a ***significant and unavoidable*** impact would occur.

4.1.4 Overview of Alternatives Considered

A total of nine alternatives to the project were considered, including one No Project Alternative, seven on-site alternatives, and one off-site alternative. To determine which of the alternatives should be evaluated in the Draft EIR, each alternative was screened to determine whether it would meet most of the basic objectives of the project, have the potential to reduce or avoid any of the significant impacts identified in the Draft EIR, and be potentially feasible.

This chapter provides a description of the alternatives considered but rejected, followed by an analysis of the three alternatives selected for evaluation: the No Project/No Build Alternative, the Existing Zoning Alternative, and the Reduced Density Alternative.

4.2 Alternatives Considered but Rejected

4.2.1 Off-Site Alternative

Under the Off-Site Alternative, the Tanforan Redevelopment Project, or a project of similar scale and intensity, would be implemented at a different location in the City of San Bruno, and no changes would occur to the project site. Depending on the location and its proximity to the alternative transportation modes and sensitive receptors, implementing the project at a different site could reduce exposure of sensitive receptors to substantial pollutant concentrations and noise during non-daytime construction.

The Off-Site Alternative was rejected as infeasible because it would not meet the fundamental purpose of the Tanforan Redevelopment Project, and would not redevelop and revitalize the Shops at Tanforan site, take advantage of the transit resources in the area, or increase the city of San Bruno's housing supply in support of its Regional Housing Needs Allocation (RHNA) obligations. The project site is included as housing opportunity Site 20 in the Housing Element, the largest opportunity site identified to provide the housing necessary to meet the City's Regional Housing Needs Allocation (RHNA) obligations.[2] The Housing Element assumed that a minimum of 1,002 housing units would be included at the project site and as part of the Housing Element's implementation, the City amended the General Plan and rezoned a portion of the project site to allow for multi-family residential uses. Thus, developing the project on this specific site fulfills citywide planning initiatives already identified in the Housing Element. Furthermore, there are no other vacant or underutilized sites within the city that could accommodate the type and scale of redevelopment envisioned for the project site, which is why the project site was identified as the largest housing opportunity site in the Housing Element. Therefore, the Off-Site Alternative would hinder the City's ability to meet its RHNA obligations in accordance with State housing law. For these reasons, the Off-Site Alternative was rejected from further consideration.

[2] The project site was evaluated as Housing Opportunity Site 14 as part of the Housing Element IS/MND and was subsequently renumbered to Housing Opportunity Site 20 as part of the adopted 2023-2031 Housing Element. This Draft EIR uses Housing Opportunity Site 20 to identify the project site consistent with how the site is referenced in the adopted Housing Element.

4.2.2 No Residential Alternative

Under the No Residential Alternative, the Tanforan Redevelopment Project would not construct any residential units on the project site. The amount of laboratory and office uses, as well as retail and open space uses would be the same as the project. This alternative was considered because it would not construct housing within the 70 dBA CNEL contour for San Francisco International Airport (SFO), which was identified as an issue of concern in comments received on the Notice of Preparation (NOP).

The No Residential Alternative was rejected as infeasible because it would not meet the underlying purpose of the project or the majority of project objectives. As described in Section 4.2.1, *Off-Site Alternative*, the project site was identified in the Housing Element as a housing opportunity site. San Bruno is a small, mostly built-out city, with relatively few areas where large-scale redevelopment can take place. The No Residential Alternative would substantially jeopardize the City's ability to fulfill its RHNA obligations, and would be inconsistent with the City's General Plan. For these reasons, the No Residential Alternative was rejected from further consideration.

4.2.3 Decreased Residential Alternative

Under the Decreased Residential Alternative, the development intensity of the project would be reduced in terms residential of development constructed at the project site. The Decreased Residential Alternative would construct 500 residential units, with the remaining project components the same. This alternative was considered for its potential to reduce the project's significant impacts related to TACs as it would reduce the overall scale of construction and future vehicle emissions, as well as the number of future on-site sensitive receptors.

The project's significant and unavoidable impact related to TAC and PM2.5 emissions are primarily the result of emissions generated during construction and the exposure of on-site sensitive receptors to those emissions. While reducing the number of residential units would reduce future on-site sensitive receptors and construction activities, construction of the alternative would still have the potential to expose receptors to criteria air pollutants and TACs. Without conducting detailed modeling, which is not required for Alternatives analysis under CEQA, it would be speculative to estimate how much mitigation would be needed to reduce impacts for future health risks—because reducing residential development would likely still result in the close proximity of on-site residences to TAC emissions and thus exposure of TACs during construction activities—or to conclude if they would be reduced below Air District threshold levels. Furthermore, as described in Section 4.2.1, *Off-Site Alternative*, developing fewer than 1,002 residential units on the project site would be inconsistent with the General Plan and Housing Element Update, and would substantially jeopardize the City's ability to fulfill its RHNA obligations. For these reasons, the Decreased Residential Alternative was rejected from further consideration.

4.2.4 Increased Residential Alternative

Under the Increased Residential Alternative, the project would demolish all existing uses at the project site except for the Century at Tanforan Theater, the Target, and their associated parking garages, and construct up to 2,000 housing units along with landscaped areas and public and privately accessible open space. No retail, laboratory, hotel, or office uses would be constructed on the project site, nor would any restaurants, cafes, or market hall be constructed. The alternative would better support San Bruno's RHNA obligations by doubling the amount of residential units

currently allowed at the site. The alternative would also reduce air quality impacts associated with non-residential uses such as office, laboratory, and retail space.

The Increased Residential Only Alternative was rejected as infeasible because it would not meet the majority of project objectives: it would not create a mixed-use, transit-oriented project that locates housing near jobs, nor would it encourage neighborhood-serving retail, or create state-of-the-art research and development facilities to support job growth and generate property tax and development fees. For these reasons, the Increased Residential Alternative was rejected from further consideration.

4.2.5 No Non-Daytime Construction Alternative

Under the No Non-Daytime Construction Alternative, concrete pours would be scheduled during daytime hours (7:00 a.m. to 10:00 p.m.) as defined by the San Bruno Municipal Code. This alternative was considered for its potential to reduce or avoid the project's significant and unavoidable impact related to non-daytime construction noise, and the corresponding cumulative impact.

The project cannot feasibly accommodate daytime concrete pours for several reasons. First, the pour is substantial in size, and the mat foundation is particularly thick, which means it requires a significant amount of time to complete. Typically, the pouring process takes between 8 to 12 hours. If this were to be done during the day, it would necessitate shutting down the entire construction site, as the amount of concrete trucks required would prohibit other materials and trucks from accessing the site, which would severely limit the movement of materials. Furthermore, weight cannot be put on concrete while it settles, limiting other actions at the project site. The curing of concrete also requires temperature controls, and the exposure to sunlight can result in water evaporating from the concrete, affecting the process. It would also disrupt access to the surrounding street network during peak traffic hours. This would cause considerable inconvenience and potential delays, making daytime pours impractical for this project. Furthermore, because it would shut down construction activities across the entire construction site for up to 100 separate days during the overall construction duration, the No Non-Daytime Construction Alternative would extend the overall construction duration. However, health risks associated with the No Non-Daytime Construction Alternative would be similar to the Project since total TAC emissions from construction would be similar to the project. For these reasons, the No Non-Daytime Construction Alternative was rejected from further consideration.

4.2.6 Revised Construction Phasing Alternative

Under the Revised Construction Phasing Alternative, the construction phasing schedule would be altered so that residential uses are constructed last. This alternative was considered for its potential to reduce or avoid the project's significant and unavoidable impact related to exposing on-site sensitive receptors to substantial TAC concentrations during construction and (later) operation. This alternative was rejected as infeasible because it would delay introduction of the mixed-use redevelopment, would reduce flexibility in the plan's phasing and buildout in a manner that is responsive to market conditions and demand, and the timing of housing production would delay achieving the City's housing goals.

4.3 Alternatives Selected for Further Review

This section describes and evaluates three alternatives to the project. This includes: the No Project/No Build Alternative, which assumes no building takes place at the project site and mall continues as it is currently constructed; the Existing Zoning Alternative, that assumes the mall stay in place, but that housing is built out to the extent allowable under ordinances already processed under the Housing Element Update; and the Reduced Density Alternative, which is the project but with a lower, reduced density in terms of housing units.

4.3.1 No Project/No Build Alternative

CEQA requires the evaluation of a No Project Alternative (CEQA Guidelines Section 15126.6(e)). The analysis of the No Project Alternative is based on the assumption that the project would not be approved. The purpose of evaluating the No Project Alternative is to allow decision-makers to compare the potential impacts of approving the project with the potential impacts of not approving the project. In certain instances, the No Project Alternative means "no build" wherein the existing environmental setting is maintained. The environmental setting is usually defined as the time of the Notice of Preparation (in the case of the project, December 2023). However, where failure to proceed with the project would not result in preservation of existing environmental conditions, the No Project Alternative should identify the practical result of the project's non-approval rather than create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment.

Under the No Project/No Build Alternative, the mall would continue operation, but further erosion of mall tenancies could be anticipated based on regional and national trends in mall retail, and no new construction would occur at the project site. Existing land uses would remain unchanged and in their current physical state. No demolition of existing uses would occur, and no new housing, retail uses, life-science laboratory uses, office uses, or hotel uses would be built. No new streetscape, open space, or internal roadways would be constructed. Existing General Plan land use classifications and zoning districts would be maintained on the project site.

4.3.1.1 Ability to Meet Project Objectives

The No Project/No Build Alternative would not meet any of the project objectives.

4.3.2 Existing Zoning Alternative

Under the Existing Zoning Alternative, the indoor mall would remain but would be converted to an entertainment center (e.g., arcade, TopGolf, or similar "fun zone"). Interior renovations would occur, but no demolition of existing uses or exterior construction would occur. Additional housing would be built out to the extent allowable under ordinances already processed under the Housing Element Update, and would be limited to the existing parking lot areas and the parcel north of Sneath Lane. Housing units would be built up to the 1,000 units allowed under the existing P-D zoning and would be constructed in the southeast corner of El Camino Real and Sneath Lane and on the parcel north of Sneath Lane. The existing 81,500-square-foot Century at Tanforan Theater would be remodeled and the existing Target would remain.

4.3.2.1 Ability to Meet Project Objectives

The Existing Zoning Alternative would accommodate existing long-term ground-lease tenants and increase the City of San Bruno's housing supply, although with less buildable land, it is uncertain that the full 1,000 units in the Housing Element could be built. It also meets most of the other project objectives, but to a lesser and in some cases substantially lesser extent than the project. It would develop the site at a housing density that takes advantage of the transit resources while delivering on-site affordable housing, open space, and community-serving retail; it would accommodate existing long-term ground-lease tenants; it would establish vibrant gathering spaces and connected retail spaces to encourage neighborhood-serving retail; it would increase the city of San Bruno's housing supply in support of RHNA obligations; and it would create a thriving mixed-use, transit-oriented project that locates housing near jobs and existing transit corridors. However, the Existing Zoning Alternative would not meet the underlying purpose of redeveloping the site with an "economically viable development that combines residential uses, community-serving retail uses, and employment opportunities near transit and freeway access," and it may not allow the project to remain financially feasible. It would also not meet other project objectives: it would not incorporate flexibility in the plan's phasing and buildout which would respond to changing market conditions; it would not include a mix of commercial office uses and research and development uses; it would not create a cohesive campus-like environment for tenants to employ key scientific and business personnel in proximity to foster efficient collaboration and productivity; and it would not provide a development and infrastructure plan that can be built in phases.

4.3.3 Reduced Density Alternative

Under the Reduced Density Alternative, the overall density of the project would be reduced. The Reduced Density Alternative was considered for its potential to reduce vehicle trips, construction activities, and consumer product use, thereby reducing and potentially avoiding health risks and PM2.5 impacts. Recognizing the City's obligation under state housing law to demonstrate progress in meeting its RHNA goal, density reductions would be focused on non-residential uses.

Under the Reduced Density Alternative, the project would construct 1,014 multi-family residential units in the same locations and configurations proposed under the project. In Flex Zone II, the square footage of non-residential (i.e., R&D/office, amenity, and retail) uses would be reduced, reducing the project's overall net new non-residential development by approximately 20 percent. This would equate to a reduction of approximately 230,000–450,000 square feet of non-residential floor area, depending on the development scenario. Approximately 3 acres (roughly half) of the flex zone would instead be developed with publicly accessible open space providing passive recreation uses such as picnic/seating areas and walking paths. With fewer buildings and more open space developed in Flex Zone II, less excavation would be required in this area under this alternative. All other components of the Reduced Density Alternative would be similar to the project.

4.3.3.1 Ability to Meet Project Objectives

The Reduced Density Alternative would meet all project objectives, but to a lesser extent than the project. The Reduced Density Alternative would develop a high-quality mixed-use redevelopment and would revitalize the Shops at Tanforan site, but the mix of uses – such as including commercial office uses, research and development uses, commercial retail uses, and/or hotel use – would be lessened by the reduction in available flex zone area, providing for fewer opportunities for those tenants. Likewise, the Reduced Density Alternative would allow for less flexibility in phasing and buildout than the project, making it less responsive to market demands and changing conditions. The Reduced Density Alternative would not provide for as much job growth or enhanced property value as the project, and while density for the residential would remain the same as the project (under Scenario A), the Reduced Density Alternative would not take as much advantage of transit resources as the project or provide for as many opportunities for neighborhood-serving retail or eating opportunities.

4.4 Impact Analysis

The environmental impact analysis focuses on the same subjects analyzed for the project to provide a meaningful comparison of impacts. Those subjects are only those where the project has a potential to result in a significant impact. See further discussion in Chapter 1, *Introduction*.

As discussed in Section 3.0.3.1, *Buildout Scenarios*, for each resource area studied, the EIR evaluates the scenario with the greatest potential to result in a significant impact. In some cases, impacts would be the same regardless of the buildout scenario, so the analysis does not evaluate a specific buildout scenario. This approach ensures that the EIR identifies the maximum potential impacts of the project based on reasonable foreseeable development outcomes. The analysis of alternatives in this section compares the impacts of each alternative to the impact of the scenario(s) evaluated for the project. Each section in Chapter 3, *Environmental Impact Analysis*, includes a table that states which scenario is evaluated for each impact (see the *Buildout Scenario Evaluated* header in each section).

4.4.1 No Project/No Build Alternative

4.4.1.1 Air Quality

The No Project/No Build Alternative would not involve any new construction or changes to existing on-site uses and, therefore, would not generate air pollutant emissions above existing conditions. As a result, this alternative would not exceed the Air District's daily significance thresholds for criteria pollutants during either construction or operation and would not conflict with any air quality plans. Since no new sources of emissions would be introduced, health risks experienced by existing sensitive receptors in the project area would not change from existing conditions, and there would be no new receptors added. Consequently, the No Project/No Build Alternative would not introduce new significant health risks or concentrations of PM2.5, which would occur under the project. No odor sources would be added to the existing site for this alternative. Therefore, the No Project/No Build Alternative would have no impact on air quality, but it would be less consistent with the aspects of the Air District's 2017 Clean Air Plan pertaining to promotion of transit-oriented development in vibrant urban communities. No mitigation measures would be required; overall, there would be fewer impacts than under the project.

4.4.1.2 Biological Resources

Under the No Project/No Build Alternative there would be no demolition, grading, excavation, or construction activities on the project site. No tree or vegetation removal would occur, and no new lighting or surfaces that could misdirect or confuse migratory birds would be introduced to the project site. The project site would remain in its current condition. The mitigation measures required for the project would not be required for this alternative. No new impacts would occur relative to baseline conditions, and impacts would be less than those of the project, which would be less than significant with mitigation.

4.4.1.3 Cultural Resources

Under the No Project/No Build Alternative, there would be no demolition, grading, excavation, or construction activities on the project site. There would be no potential to affect historical resources or encounter previously unknown archaeological resources or human remains. The project site would remain in its current condition and the existing memorial plaque and commemorative garden would remain in its current location. The mitigation measures required for the project would not be required for this alternative. No new impacts would occur relative to baseline conditions, and impacts would be less than those of the project, which would be less than significant with mitigation.

4.4.1.4 Energy

Under the No Project/No Build Alternative, there would be no demolition, excavation, or grading activities on the project site, and no temporary demand for energy use during construction nor ongoing operational energy consumption would occur. The project site would remain in its current condition. The mitigation measures required for the project would not be required for this alternative. Therefore, the No Project/No Build Alternative would have no impact on energy use, representing a lesser impact than the project's impact.

4.4.1.5 Geology, Soils, and Paleontology

Under the No Project/No Build Alternative, there would be no demolition, grading, excavation, or construction activities at the project site. There would be no potential to encounter previously unknown paleontological resources. The project site would remain in its current condition. The mitigation measures required for the project would not be required for this alternative and no new impacts would occur relative to baseline conditions, and impacts would be less than those of the project, which would be less than significant with mitigation.

4.4.1.6 Greenhouse Gases

The Air District's land use Threshold Option A and the table of project attributes in the California Air Resources Board's (CARB's) 2022 Scoping Plan are intended to evaluate new development; thus, consistency with these documents is not applicable to the No Project/No Build Alternative. In addition, the No Project/No Build Alternative would not result in the construction of new uses and would thus not propose any changes with the potential to conflict with Plan Bay Area 2050, although by failing to implement a dense, mixed-use project in proximity to transit, it would not advance Plan Bay Area 2050 objectives, nor would it help implement CARB's 2022 Scoping Plan or attainment of 2030 and 2045 statewide GHG targets.

Although emissions may occur, such as those associated with mobile sources, energy use, waste generation, water consumption, refrigerants, and stationary sources, such emissions are already occurring under existing conditions and would not be new. The No Project/No Build Alternative would not result in the construction of new uses but would maintain existing uses. However, as discussed in Section 4.4.1.14, *Transportation*, the No Project/No Build Alternative would not achieve the vehicle miles traveled (VMT) reductions that are anticipated under the project, or the correlated reduction in regional GHG emissions.

Overall, because the No Project/No Build Alternative would not increase greenhouse gas (GHG) emissions relative to existing conditions, there would be no impact with respect to greenhouse gases, but as discussed above, this alternative would not advance policies promotion GHG reductions contained in Plan Bay Area 2050 or CARB's 2022 Scoping Plan.

4.4.1.7 Hazards and Hazardous Materials

Under the No Project/No Build Alternative, there would be no demolition, grading, excavation, or construction activities on the project site, and no new hazards or hazardous materials would be introduced to the project site during construction operation. The project site would remain in its current condition. The mitigation measures required for the project would not be required for this alternative. No new impacts would occur relative to baseline conditions, and impacts would be less than those of the project, which would be less than significant with mitigation.

4.4.1.8 Hydrology and Water Quality

Under the No Project/No Build Alternative, there would be no construction activities including demolition, grading, or excavation at the project site. There would be no potential to alter drainage patterns on the project site or affect water quality. The project site would remain in its current condition. The mitigation measures required for the project would not be required for this alternative. However, the No Project/No Build Alternative would not achieve the decrease impervious surface area that would occur under the project. Overall, no new impacts would occur relative to baseline conditions, and impacts would be less than those of the project, which would be less than significant with mitigation.

4.4.1.9 Land Use

Under the No Project/No Build Alternative, there would be no demolition or construction activities at the project site. No new land uses would be introduced, and the project site would remain in its current condition. No new impacts would occur relative to baseline conditions. The No Project/No Build Alternative would fail to implement a dense, mixed-use project in proximity to transit, and thus it would not advance Plan Bay Area 2050 objectives or help implement CARB's 2022 Scoping Plan. No Project/No Build Alternative would likely result in both higher total VMT and higher VMT per capita and would be less consistent with SB 743's intent by failing to create a dense, mixed-use environment in proximity to transit. Overall, the No Project/No Build Alternative would have no impact on land use and planning, and impacts would be less than those of the project, which would be less than significant with mitigation.

4.4.1.10 Noise

Under the No Project/No Build Alternative, the mall would continue operation and no new construction would occur at the project site. Therefore, there would be no demolition, grading, excavation, or construction activities on the project site, and no new sources of noise would be introduced to the project site during construction or operation. The project site would remain in its current condition. The mitigation measures required for the project would not be required for this alternative. Therefore, the No Project/No Build Alternative would avoid the project's less-than-significant impacts related to daytime construction noise and construction vibration, less-than-significant-with-mitigation impacts related to operational noise and aircraft noise, and the significant and unavoidable project and cumulative impact related to non-daytime construction noise. No new impacts would occur relative to baseline conditions, and impacts would be less than those of the project.

4.4.1.11 Population and Housing

Under the No Project/No Build Alternative, existing land uses would remain unchanged; no new housing would be constructed and no additional employee-generating uses would be added to the site. Unlike the project, the No Project/No Build Alternative would not result in a direct population increase due to on-site residents since no new housing would be constructed at the project site. No planned housing assumed in the General Plan Housing Element would be constructed at the project site. In addition, since this alternative would not induce additional employees, the No Project/No Build Alternative would not result an increase in housing demand and new residents in the city and region. Therefore, the No Project/No Build Alternative would result in substantially less demand for new housing, resulting in no impacts on population and housing. In addition, since existing uses would continue at the project site, like the project, the No Project/No Build Alternative would result in no impact related to the displacement of people and housing.

4.4.1.12 Public Services

Under No Project/No Build Alternative, there would be no demolition or construction activities at the project site. No new land uses that could generate employment and indirect population would be introduced, and the project site would remain in its current condition. No new impacts would occur relative to baseline conditions, and impacts related to fire, police, school, and library services would be less than those of the project, which would be less than significant.

4.4.1.13 Recreation

Under the No Project/No Build Alternative, existing land uses would remain unchanged; no new housing would be constructed and no additional employee-generating uses would be added to the site. The No Project/No Build Alternative would not result in a direct population increase or induce additional employees. As such, the No Project/No Build Alternative would not result an increase in the use of parks and recreational facilities in the city and region. Therefore, the No Project/No Build Alternative would result in substantially less demand for parks and recreational facilities, resulting in no impacts. No new impacts would occur relative to baseline conditions and impacts to parks and recreational facilities would be less than those of the project, which would be less than significant.

4.4.1.14 Transportation

Under the No Project/No Build Alternative, the transportation environment internal to the site would remain unchanged and the bounding streets (El Camino Real, Sneath Lane, and Huntington Avenue) would only be altered by other development or city projects, such as the Southline project's extension of Sneath Lane and City's plan for a cycle track on Huntington Avenue. By leaving the transportation environment in the same condition as it exists today, the No Project/No Build Alternative would not introduce any new design hazards nor would it interfere with any transportation plans or policies.

The No Project/No Build Alternative would not result in a direct population increase or induce additional employees. As such, the No Project/No Build Alternative would not result in a change in the number, length, or directionality of the trips to or from the site. The current site generates more daily vehicle trips than either development scenario under the project. The existing site generates fewer AM peak hour trips but more PM peak hour trips than either project scenario. Thus, overall vehicle trips associated with the site are similar between the No Project/No Build Alternative and the project. With a similar number of trips, the No Project/No Build Alternative would also have a less than significant impact on freeway queueing.

Retail trips associated with the existing site are on average shorter than trip lengths associated with work and residential trips. However, by adding housing into a city and county that have a jobs-housing imbalance, the project is likely to reduce trip lengths regionally by providing options for people to live closer to where they work in San Bruno and other locations in San Mateo County. This potential reduction in vehicle miles traveled (VMT) is even more likely given the dense, mixed-use, and transit-oriented nature of the project. Therefore, the No Project/No Build Alternative would likely result in both higher total VMT and higher VMT per capita than the project, and would be less consistent with SB 743's intent by failing to create a dense, mixed-use environment in proximity to transit.

4.4.1.15 Tribal Cultural Resources

Under the No Project/No Build Alternative, there would be no demolition, grading, excavation, or construction activities at the project site. There would be no potential to encounter previously unknown Tribal cultural resources. The project site would remain in its current condition. The mitigation measures required for the project would not be required for this alternative. No new impacts would occur relative to baseline conditions, and impacts would be less than those of the project, which would be less than significant with mitigation.

4.4.1.16 Utilities

Under the No Project/No Build Alternative, there would be no demolition or construction activities at the project site. No new land uses would be introduced that could generate new residents and employees and a resulting increase in the demand for utilities and service systems, and the project site would remain in its current condition. No new impact would occur relative to baseline conditions, and impacts would be less than those of the project, which would be less than significant with mitigation.

4.4.2 Existing Zoning Alternative

4.4.2.1 Air Quality

Conflict with or Obstruct Implementation of the Air Quality Plan

Under the Existing Zoning Alternative, a maximum of 1,000 residential dwelling units could be constructed and the existing mall would continue operating in a reconfigured fashion. While the existing retail uses would continue generating operational emissions, these emissions are part of the current baseline and would not represent new impacts (recognizing emissions may vary slightly due to the anticipated internal reconfigurations). The residential uses proposed under this alternative would be the only new source of emissions, involving substantially less new development and generating fewer emissions than the project. Including both existing and proposed uses, the Existing Zoning Alternative would result in approximately 52 percent less non-residential space than Scenario A and a comparable number of residential dwelling units. Relative to Scenario B, this alternative would include approximately 43 percent less non-residential square footage and 34 percent fewer residential units. In total, while the proposed development under the Existing Zoning Alternative would include similar land uses (retail, residential), it would not include any office or R&D components, and the overall scale of development would be smaller. As a result, this alternative would involve less intensive construction and operational activities and associated emissions than both project scenarios.

The project would be generally consistent with the Air District's 2017 Clean Air Plan, because it would support the primary goals of the plan, include applicable control measures from the plan, and not disrupt any of the measures from the plan, although it would be less supportive of aspects of the Air District's 2017 Clean Air Plan pertaining to promotion of transit-oriented development in vibrant urban communities with the elimination of non-residential uses near transit. As with the project, it is likely that the Existing Zoning Alternative would not disrupt implementation of any of the measures for the plan and would include energy saving features and sustainability measures, such as incorporating on-site renewable energy systems and exceeding California's energy efficiency standards. Thus, similar to the project, this alternative would not conflict with the applicable regional air quality plans. Therefore, impacts are considered less than significant, but somewhat greater than the project.

Construction Criteria Air Pollutant Emissions

As previously described, the residential uses proposed under the Existing Zoning Alternative would be the only new source of emissions. Though the extent of construction for this alternative is not currently known with certainty, the smaller scale of new development under this alternative would likely result in a shorter construction period than the project. However, to maintain a shorter construction period, it is likely that the daily construction activities under this alternative would be similar to the project. Therefore, daily construction emissions would likely be similar to the project's but with a shorter duration overall.

Project construction would generate exhaust emissions of nitrous oxides (NO_X) in exceedance of the Bay Area Air District (Air District) significance threshold. Similar to the project, development of the Existing Zoning Alternative would likely exceed the BAAQMD's significance thresholds during construction, requiring mitigation like Mitigation Measure AQ-2-A (Use Clean Diesel-Powered or Electric Equipment During Construction to Control Construction-related Emissions) and Mitigation Measure AQ-2-B (Implement Modified Bay Area Air District Basic Construction Mitigation Measures to Reduce Dust Emissions). Implementation of Mitigation Measures AQ-2-A and AQ-2-B would likely reduce emissions below applicable BAAQMD thresholds. Therefore, with implementation of Mitigation Measures AQ-2-A and AQ-2-B, these impacts would be less than significant with mitigation, the same as the project.

Operational Criteria Air Pollutant Emissions

As previously described, the residential uses proposed under the Existing Zoning Alternative would be the only new source of emissions. Similar to the project, operation of the proposed residential uses could result in air quality impacts, primarily from mobile and area sources. However, the overall scale of new operational activities and associated emissions under this alternative would be smaller than the project. Additionally, because this alternative would not include any new office or R&D uses, it would not generate emissions from laboratory operations or stationary sources.

Despite emissions being lower than for the project, operational emissions associated with this alternative could nonetheless exceed the Air District's operational significance thresholds and require similar mitigation, such as Mitigation Measure AQ-2-C (Require Low-VOC Coatings During Project Operation) and Mitigation Measure AQ-2-D (Replace Gas-Powered Landscape Equipment with Zero-Emissions Landscape Equipment). Implementation of Mitigation Measure AQ-3-A (Installation of High-Efficiency Air Filtration Systems) would further reduce impacts. Similar to the project, implementation of Mitigation Measures AQ-2-C, AQ-2-D, and AQ-3-A, if needed, would likely be sufficient to reduce operational emissions below the applicable thresholds. It is also possible, however, that operational emissions would be below the significance thresholds and no mitigation would be required. Conservatively, emissions for this alternative are assumed to exceed the thresholds, and impacts would likely be less than significant with mitigation.

If construction and operations were to overlap for the Existing Zoning Alternative, emissions during that period would likely remain below significance thresholds with implementation of mitigation. Therefore, with implementation of the mitigation measures stated above, impacts would likely be less than significant with mitigation, similar to the project.

Exposure of Sensitive Receptors to Carbon Monoxide Hot Spots

Traffic generated by the project would have the potential to create carbon monoxide (CO) hot spots at nearby roadways and intersections. Because the overall scale of development would be smaller under the Existing Zoning Alternative, this alternative would generate fewer new vehicle trips than the project, resulting in lower CO concentrations at potential hot spots. Similar to the project, this alternative would likely be consistent with the applicable congestion management plan and meet the Air District's screening criteria for CO hot spots, which is 44,000 vehicles per hour at affected intersections and 24,000 vehicles per hour at affected intersections where vertical or horizontal mixing is limited (i.e., a tunnel). Thus, as with the project, this impact would be less than significant.

Construction and Operational TAC Emissions

Construction of the Existing Zoning Alternative would involve the use of diesel-fueled equipment, which would generate PM2.5 and DPM, like the project. During operations, delivery trucks and other heavy-duty vehicles traveling to and from the site could also generate PM2.5 and DPM emissions, though at lower levels than the project due to the reduced scale of development. Because this alternative would not include new office or R&D uses, it would not produce reactive organic gas (ROG)-based TACs, PM2.5, or DPM emissions from laboratory operations or other stationary sources.

Several existing sensitive receptors are located within 1,000 feet of the project site. Like the project, this alternative would introduce new residential uses on the site. However, unlike the project, this alternative is more likely to complete residential construction in a single phase, reducing the potential for future residents to be exposed to emissions from subsequent construction activities. Supporting this conclusion, the project proposes constructing 1,014 residential units in Phase 1, while this alternative includes only 1,000 units, making it more feasible to complete and occupy the development in one stage. Although the extent of construction activities under this alternative is not known with certainty, they are expected to be less intensive than those of the project, reducing the amount of emissions and duration of exposure.

As shown in Table 3.1-12, the project would result in significant health risks and PM2.5 concentrations for future on-site receptors. No exceedances of any Air District project-level health risk thresholds are anticipated for off-site receptors. As with the project, impacts to existing off-site receptors would likely remain below significance thresholds. Because this alternative is not expected to expose future residents to emissions from subsequent construction phases, it would likely not result in significant health risks and PM2.5 concentrations from construction activities at on-site receptors. Operational emissions may contribute to health risks and PM2.5 concentrations, though to a lesser extent than the project. Mitigation Measures AQ-2-A, AQ-2-B, and AQ-2-D may be required to reduce emissions associated with this alternative. However, unlike the project, health risks and PM2.5 concentrations would likely be below applicable thresholds with mitigation. It is also possible, however, that health risks and PM2.5 concentrations would be below the significance thresholds, and no mitigation would be required. Conservatively, emissions for this alternative are assumed to exceed the thresholds. However, with the same mitigation measures as described for the project, impacts would likely be less than significant.

Exposure of Sensitive Receptors to Asbestos During Construction

As with the project, asbestos impacts could occur if demolition of existing buildings containing asbestos or disturbance of any features exposes workers. The Existing Zoning Alternative would comply with Air District's Regulation 11, Rule 2, which would control emissions of asbestos to the atmosphere during demolition activities. Accordingly, this impact would be less than significant, the same as the project.

Objectionable Odors

Similar to the project, the Existing Zoning Alternative does not propose any odor-generating facilities, such as those identified by the Air District in its CEQA Guidelines (BAAQMD 2023: Table 5-4). Nonetheless, construction of the Existing Zoning Alternative may generate odors associated with diesel exhaust, asphalt paving, and the use of architectural coatings and solvents; limited odors may also result from residential cooking appliances during operations. Because this alternative would

not include any new office or R&D uses, it would not generate odors related to laboratory operations or stationary sources. Similar to the project, any odors would be limited to areas adjacent to the building and would not affect a substantial number of people. Additionally, this alternative would comply with Bay Area Air District Regulation 7, ensuring that any odors from construction and operation would not exceed the Air District's general odor limitations or specific limitations on odorous compounds. Because the Existing Zoning Alternative does not propose any odor-generating facilities and would not be expected to exceed the applicable Air District threshold, this impact would be less than significant, the same as the project.

4.4.2.2 Biological Resources

Under the Existing Zoning Alternative, the mall would continue in operation, and interior renovations would occur. No demolition would occur, and additional housing would be built out, limited to the existing parking lot areas. Ground disturbance would be slightly reduced compared to the project due to the lack of demolition; however, ground disturbing and excavation activities associated with the new housing would still occur resulting in potential impacts to biological resources from tree removal. As such, potential impacts to biological resources that would occur under the project would also occur under the Existing Zoning Alternative; thus, implementation of Mitigation Measure BIO-1-A: Preconstruction Nesting Bird Surveys and Buffer Areas, Mitigation Measure BIO-4-A: Lighting Measures to Reduce Impacts on Birds and Mitigation Measure BIO-4-B: Building Design Measures to Minimize Bird-Strike Risk would continue to apply to this alternative. Overall, impacts would be less than significant with mitigation, as with the project, but slightly reduced compared to the project due to the reduced extent of ground disturbance and likely reduction in tree removals.

4.4.2.3 Cultural Resources

Under the Existing Zoning Alternative, the mall would continue in operation, and interior renovations would occur. No demolition would occur, and additional housing would be built out to the extent allowable under ordinances already processed under the Housing Element Update, limited to the existing parking lot areas. Ground disturbance would be slightly reduced compared to the project due to the lack of demolition; however, ground disturbing and excavation activities associated with the new housing would still occur resulting in potential impacts to cultural resources. Additionally, the extant on-site memorial and commemorative garden may be disturbed by the adjacent new construction in the existing parking lot areas. As such, potential impacts to historical resources, archaeological resources, and human remains that would occur under the project would also occur under the Existing Zoning Alternative; thus, implementation of Mitigation Measure CUL-1: Relocate and Incorporate the Existing Memorial and Commemorative Garden on the Property; CUL-2-A: Conduct Cultural Resource Awareness Training and Exploratory Trenching Prior to Project-Related Ground Disturbance; and CUL-2-B: Stop Work if Buried Cultural Deposits are Encountered During Construction Activities would continue to apply to this alternative. Overall, impacts would be less than significant with mitigation, as with the project, but slightly reduced compared to the project due to the reduced extent of ground disturbance.

4.4.2.4 Energy

The Existing Zoning Alternative would construct 1,000 residential units on the project site with the existing mall, Target, and Century at Tanforan Theater under continued operation. Under the Existing Zoning Alternative, less construction activities would be required as only construction of the residential units would occur with limited interior renovations of the existing mall. No demolition or exterior renovations to the mall would occur. This would reduce the amount of energy consumed during construction compared to the project, but would not eliminate the impact. Mitigation Measure AQ-2-A would continue to apply to the Existing Zoning Alternative. The Existing Zoning Alternative would have a lesser impact than the project's less than significant with mitigation energy impacts.

Operation of the Existing Zoning Alternative would generate fewer vehicle trips than the project because there would be fewer employees at the project site, and thus would consume less energy in the form of fuel from on-road mobile sources.[3] In addition, since there would be less square footage than under the project, less energy would be consumed by the land uses in the form of electricity, stationary sources, and landscaping activities, and indirectly through waste and wastewater generation. As with the project, it is likely that the Existing Zoning Alternative would be designed similar to the project, and would incorporate on-site renewable energy resources, efficient-flow and flush fixtures, smart metering, leak detection systems, water re-use for low maintenance and drought tolerant landscaping, electric vehicle charging stations, transportation demand management (TDM) measures, and all-electric building design, including lighting and heating, ventilation, and air conditioning (HVAC) and mechanical systems. Operation of Existing Zoning Alternative would result in reduced amount of energy consumption compared to the project. Accordingly, operational energy consumption under the Existing Zoning Alternative would be less than significant and less than that of the project.

4.4.2.5 Geology, Soils, and Paleontology

Under the Existing Zoning Alternative, demolition, grading, excavation, or construction activities at the project site would mostly be limited to the existing parking lot areas. The mall would remain and conversions or renovation would happen mostly within the existing structure. Therefore, while there would be the potential to encounter previously unknown paleontological resources, this would be limited to the undeveloped parking lot areas. The mitigation measures related to paleontological resources would still be required and in general impacts would be less than those of the project, which would be less than significant with mitigation, but less than those of the project due to the reduced amount of ground disturbance.

[3] On-road mobile sources include energy consumed by diesel, gasoline, natural gas, electricity, and hybrid-fueled cars, trucks, buses, and delivery vehicles.

4.4.2.6 Greenhouse Gases

Generation of GHG Emissions During Construction and Operation

Under the Existing Zoning Alternative, 1,000 residential dwelling units would be constructed and the existing mall would continue operating. While the existing retail uses would continue to generate operational GHG emissions, these emissions are part of the current baseline and would not represent new impacts. The residential uses proposed under this alternative would be the only new source of emissions, involving substantially less development and generating fewer GHG emissions than the project. Including both existing and proposed uses, the Existing Zoning Alternative would result in approximately 52 percent less non-residential square footage than Scenario A and a comparable number of residential dwelling units. Relative to Scenario B, this alternative would include approximately 43 percent less non-residential square footage and 34 percent fewer residential units. In total, while the proposed development under the Existing Zoning Alternative would include similar land uses (retail, residential), it would not include any office or R&D components, and the overall scale of development would be smaller. As a result, the Existing Zoning Alternative would involve less intensive construction and operational activities and associated GHG emissions than both project scenarios.

As discussed in Section 3.6, *Greenhouse Gases*, the significance of the project's GHG impact is determined based on its consistency with the Air District's land use Threshold Option A design elements. It is currently unknown whether the Existing Zoning Alternative would be consistent with the design elements outlined as part of the Air District's land use Threshold Option A. Because consistency with this design elements requires a detailed assessment of a project's features, it cannot be determined whether future development would be consistent with or conflict with the plan. The level of detail necessary to determine consistency with the Air District's land use Threshold Option A is greater than the level of detail that is appropriate for analyzing a project's alternatives under CEQA. However, it is likely that this alternative would result in design features similar to those of the project and be consistent with the Threshold Option A design elements. This impact would likely be less than significant, similar to the project.

Conflicts with Applicable Plans and Policies

It is currently unknown whether the Existing Zoning Alternative would conflict with any applicable plans or policies adopted to reduce GHG emissions, because there are no specific development projects consistent with this alternative proposed for the site. Because consistency with CARB's 2022 Scoping Plan and Plan Bay Area 2050 requires a detailed assessment of a project's features, it cannot be determined whether future development would be consistent with or conflict with these plans. The level of detail necessary to determine consistency with these plans is greater than the level of detail that is appropriate for analyzing a project's alternatives under CEQA. However, it is likely that this alternative would result in design features similar to those of the project and be consistent with CARB's 2022 Scoping Plan and Plan Bay Area 2050, although by failing to implement a dense, mixed-use project in proximity to transit, it would not, to the same extent as the project, advance Plan Bay Area 2050 objectives, nor would it help implement CARB's 2022 Scoping Plan or attainment of 2030 and 2045 statewide GHG targets to the same extent as the project. This impact would be greater than the project, although would remain a less than significant impact.

4.4.2.7 Hazards and Hazardous Materials

Under the Existing Zoning Alternative, the indoor mall would remain but would undergo renovations to its interior. No demolition or exterior construction would occur. Additional housing would be built out to the extent allowable under ordinances already processed under the Housing Element Update, but would be limited to the existing parking lot areas. The Existing Zoning Alternative would include retail and residential land use, however, it would not include any office or R&D uses, and thus, the overall scale of development would be smaller. As a result, the Existing Zoning Alternative would involve less construction activity and areas of disturbance.

Although the mall would remain and thus, demolition activities would not occur, the Existing Zoning Alternative would be implemented within the same general footprint as the project and therefore, the potential to encounter contaminated soil and/or groundwater during ground disturbance activities would exist. As such, future housing development associated with the Existing Zoning Alternative would be required to consider conclusions and implement recommendations included in various site-specific investigations conducted (previously) within the project footprint (described in Section 3.7, *Hazards and Hazardous Materials*, of this EIR). Furthermore, as there is a potential for exposure to contaminated soil and contaminated groundwater, implementation of Mitigation Measures HAZ-2-A and HWQ-1 would still be required. Similar to the project, future development would be required to notify the San Mateo County Environmental Health Division of any excavation or redevelopment on the Sears Automotive Center/Sears #1478 site. Impacts associated with foreseeable upset and accident conditions involving the release of hazardous materials and the Existing Zoning Alternative being located on a Cortese List site would be less than significant.

The Existing Zoning Alternative would involve less construction activity and areas of disturbance but would still require the routine handling of hazardous materials. Therefore, the handling of hazardous materials would still be subject to applicable regulations for both construction and operational phases. Furthermore, operational use of hazardous materials under the Existing Zoning Alternative would be minimal as R&D uses would not occur. Hazardous materials use during operations would be exclusive to maintenance activities and would not these materials would not be used or stored in significant quantities. Impacts associated with the routine transport, use, or disposal of hazardous materials would be less than significant and less than those of the project.

4.4.2.8 Hydrology and Water Quality

Under the Existing Zoning Alternative, the indoor mall would remain but would be converted to an entertainment center. Interior renovations would occur, but no demolition of existing uses or exterior construction would occur. Additional housing would be built out to the extent allowable under ordinances already processed under the Housing Element Update, and would be limited to the existing parking lot areas. The Existing Zoning Alternative would include similar land uses (retail, residential) however it would not include any office or R&D components, and the overall scale of development would be smaller. As a result, the Existing Zoning Alternative would involve less construction activity and areas of disturbance than both project scenarios. Otherwise, infrastructure improvements associated with the Existing Zoning Alternative would be similar to those described for the project. The project site is serviced by existing stormwater services. New on-site facilities would be connected to new services through the installation of new, localized connections. Similar utility improvements would be constructed during project construction and used during project operation.

Because the Existing Zoning Alternative would be constructed at the same location as the project, surface water hydrology and drainage, water quality conditions, the underlying groundwater basin and conditions, and flood hazards would be the same as for the project. Therefore, impacts related to water quality, alterations in drainage patterns, flooding, or release of pollutants due to project inundation would be the same as the project, as the areas that would be developed under the Existing Zoning Alternative are already developed with largely impervious surface areas, so the resulting drainage patterns would be similar to those that would result under the project. The same mitigation to reduce water quality impacts during construction dewatering and verifying existing drainage capacity prior to operation would be required under the Existing Zoning Alternative as under both project scenarios. Therefore, impacts on hydrology and water quality would be the same as under the project. In addition, because the Existing Zoning Alternative would be subject to the same hydrology and water quality regulatory requirements as the project, impacts related to conflicting or obstructing a water quality control plan or sustainable groundwater management plan would be the same as the project.

Because the Existing Zoning Alternative would be constructed at the same location and involve similar depths of excavation as the project, it would encounter groundwater at the same location and require the same extent of temporary dewatering during construction. This would result in the same impacts related to groundwater supply. In addition, because infrastructure improvements associated with the Existing Zoning Alternative would be similar to those described for the project, impacts related to changes in impervious cover, groundwater recharge, peak storm drain flow, and flood hazards would also be the same. Stormwater management facilities of the Existing Zoning Alternative, like the project, are required to meet local, state and federal requirements for water quality treatment as well as flood control. The impact relating to alterations in drainage patterns resulting in erosion or flooding or exceeding the drainage system capacity would be the same as under the project.

Overall, impacts to hydrology and water quality would be less than significant with mitigation under the Existing Zoning Alternative, and slightly reduced compared to the impacts of the project due to the reduced extent of ground disturbance.

4.4.2.9 Land Use

Overall, the Existing Zoning Alternative would generally have the same land use impacts, though without providing some of the density benefits, as the project. Compared to the project, the Existing Zoning Alternative would change the land use scenario of the project by reducing the amount of residential units to be provided, no longer constructing new non-residential uses (R&D/office/amenity, and retail), and maintaining the existing mall, Target, and Tanforan at Century Theater, instead. The Existing Zoning Alternative would likely incorporate circulation and infrastructure improvements, pedestrian/bicyclist and open space improvements, building design, and TDM program similar to, but less extensive than, the project. The Existing Zoning Alternative would improve connectivity between the project site and local mass transit services, which would further promote connectivity between the project site and larger community, although likely to a lesser extent than the project.

Like the project, the Existing Zoning Alternative falls within the 70 dB CNEL noise contour under the Airport Land Use Compatibility Plan (ALUCP), which states that residential uses are incompatible with noise levels above 70 dB. The Existing Zoning Alternative would be anticipated to receive a determination of inconsistency with the ALUCP and require a Local Agency Override by the San

Bruno City Council as a discretionary approval. In addition, similar to the project, the Existing Zoning Alternative would be required to implement Mitigation Measure NOI-3 to ensure the alternative's inconsistency with the ALUCP's noise compatibility policies would not result in a significant environmental effect on the proposed residential uses. The No Project/ Reasonably Foreseeable Development Alternative would also be required to implement Mitigation Measure HAZ-5 to ensure consistency with the ALUCP's height limitations.

The Existing Zoning Alternative would foster compact infill development in proximity to transit in order to reduce VMT and GHG emissions, consistent with the goals and objectives of Plan Bay Area 2050, but to a lesser extent than the project. In addition, the Existing Zoning Alternative would be located on an infill site within an urbanized area and focus growth within a PDA and TPA/TRA. The Existing Zoning Alternative would not require the same General Plan and Zoning Ordinance amendments as the project, as the alternative would be built out to the extent allowable under ordinances already processed under the Housing Element Update, and would be limited to the existing parking lot areas. The alternative would likely include pedestrian and bicyclists amenities and alternative transportation improvements, although likely to a lesser extent than the project, that would be generally consistent with the San Bruno Walk N' Bike Plan, BART Station Access Policy, San Bruno Transit Corridors Plan, and Grand Boulevard Initiative. Therefore, the Existing Zoning Alternative would not conflict with plans or policies intended to reduce an environmental effect with implementation of identified EIR mitigation measures. Therefore, land use and planning impacts under the Existing Zoning Alternative would be similar to those of the project, and would be less than significant with mitigation.

4.4.2.10 Noise

Under the Existing Zoning Alternative, the mall would continue operation but would be converted to an entertainment center. There would be no demolition of existing uses or large-scale exterior construction associated with the mall, but interior renovations would take place. In addition, up to 1,000 housing units would be built out in the existing parking lot areas (in the southeast corner of El Camino Real and Sneath Lane and on the parcel north of Sneath Lane); this component of the Existing Zoning Alternative would result in exterior construction activities.

The amount of new development under this alternative would be reduced as compared to the project. Accordingly, the construction schedule for the project may be reduced. In addition, large-scale construction activities would not be expected to occur near the edges of the project site that are closest to off-site sensitive uses (e.g., in the southeast portion of the project site, west of Huntington Avenue). Therefore, the nearest distance from construction areas for this alternative to off-site sensitive uses may be increased under the Existing Zoning Alternative. However, similar equipment is generally used for most construction projects, so the 3 loudest pieces of equipment proposed for use during the worst-case construction phase under this alternative may result in similar worst-case noise levels to those presented in the project noise analysis (refer to EIR Table 3.10-13). Overall, construction would likely result in similar worst-case noise levels during daytime hours as compared to the project (noting that the construction duration and intensity of construction activities may be reduced as compared to the project). Therefore, daytime construction noise under this alternative would likely be below the 85 dBA limit at 100 feet, and would therefore be expected to comply with allowable noise levels for daytime Construction in the City. Daytime construction noise impacts would be less than significant under this alternative (as was the case with the project), and reduced as compared to the impacts of the project.

It is possible this alternative would also require nighttime construction, as is the case with the project. Based on the estimated noise levels for project non-daytime concrete pours (as shown in Table 3.10-14), and assuming worst-case non-daytime noise levels could be similar under this alternative (i.e., consisting of primarily concrete pour activities), construction noise from concrete pours during non-daytime hours may be in excess of the applicable criterion for nighttime construction noise (i.e., 60 dBA at a distance of 100 feet). Note that the smaller scale of construction for this alternative would likely result in a reduced frequency of nighttime work, and the distances to the nearest sensitive uses may be increased. Therefore, non-daytime construction noise impacts would likely be reduced under this alternative as compared to the project. However, because worst-case noise levels from non-daytime construction under this alternative could exceed thresholds, nighttime construction noise impacts would be significant under this alternative, as was the case for the project. Implementation of project Mitigation Measure NOI-1-A, which requires the development of a Construction Noise Control plan to reduce noise from nighttime construction, would reduce noise impacts from nighttime construction under this alternative. In addition, a modified version of project Mitigation Measure NOI-1-B (to ensure the appropriate location for the temporary construction noise barrier is selected) may be required depending on the proximity of nighttime construction activities for this alternative to nearby sensitive uses. However, as is the case with the project, it may not be feasible in all instances for nighttime noise levels to be reduced to below the significance threshold of 60 dBA Leq at 100 feet, even if noise is somewhat reduced. The potential also still exists for nighttime construction pours to overlap with those of the Southline project. For these reasons, the Existing Zoning Alternative would be expected to reduce, but not avoid, the significant and unavoidable project-level and cumulative impacts related to construction noise during non-daytime hours.

With regard to construction haul truck noise, this alternative would likely result in fewer haul truck trips than the project, and would likely use the same haul routes as the project. Therefore, as is the case with the project, temporary noise impacts related to haul truck use for the project would be less than significant (and would likely be reduced as compared to the project).

During operations, this alternative would generate fewer vehicle trips than the project because there would be fewer employees and residents accessing the project site. Therefore, traffic noise impacts from this alternative would be reduced as compared to project-related impacts. As project-related traffic noise impacts were determined to be less than significant, traffic noise impacts from the Existing Zoning Alternative would also be less than significant.

Under the Existing Zoning Alternative, the types of rooftop heating and cooling equipment associated with new residential development would likely be similar to those evaluated for potential residential uses under the project. However, equipment would likely be located farther from existing residential receptors due to the proposed locations for housing under this alternative. In addition, fewer pieces of new mechanical equipment would likely be installed under this alternative as compared to the project, since most of the mall would continue to operate as it currently does with minor renovations. Specifics are not known at this time related to the types, locations, and noise levels of future equipment; however, based on the project analysis, it is possible that noise from equipment installed under this alternative would result in a greater than 10 dB increase in noise at the property plane of any property. Noise impacts related to mechanical equipment noise under this alternative could therefore be significant, even though they would likely be reduced as compared to the project. Implementation of project Mitigation Measure NOI-1-C would reduce this potentially significant impact related to heating, cooling, and ventilation equipment noise to a less-than-significant level. Therefore, mechanical equipment noise impacts under the Existing Zoning

Alternative would be less than significant with mitigation, as is the case with project (and would likely be reduced under this alternative as compared to the project).

With regard to emergency generator testing, the Existing Zoning Alternative would likely include a smaller number of on-site emergency generators due to the limited new development proposed (i.e., just new residential uses and renovation-related improvements). Therefore, emergency generator noise impacts would likely be reduced under this alternative as compared to the project. However, as with the project, even though the testing of emergency generators would be short term (i.e., 30 to 60 minutes each time) and intermittent (i.e., approximately once per month), noise from the testing of emergency generators under this alternative would likely result in noise levels in excess of applicable Municipal Code criterion in San Bruno because generator noise is generally quite loud. Noise impacts from emergency generator testing could be significant, in which case mitigation would be required. Implementation of project Mitigation Measure NOI-1-D would reduce the potentially significant impact related to emergency generator testing noise to a less-than-significant level. Therefore, noise impacts related to emergency generator testing under the Existing Zoning Alternative would be less than significant with mitigation, as is the case with project (and would likely be reduced under this alternative as compared to both Scenario A and B of the project).

With regard to loading docks, the Existing Zoning Alternative would likely result in a smaller number of loading docks and associated loading activities than would occur under the project because of the types of new uses proposed under this alternative (e.g., limited new residential land uses). Therefore, as with the project, temporary and short-term project loading activity would result in less than significant noise impacts. Similarly, parking garages under this alternative would likely be smaller, and further from nearby off-site sensitive uses. Because parking garage noise for the project was estimated to be at least 26 dB below existing noise levels in the area and parking garage noise would likely be reduced under this alternative, noise impacts related to parking activity would likely remain less than significant and would be reduced as compared to the project.

With regard to vibration impacts, since the proximity of construction activities to nearby off-site structures would be similar or slightly increased under this alternative, vibration impacts would be similar, or slightly reduced, under this alternative as compared to the project. With respect to annoyance-related vibration during nighttime hours under the project, nighttime construction was estimated to be below the strongly perceptible threshold of 0.1 PPV in/sec from the Caltrans guidelines for the evaluation of vibration-induced annoyance; vibration-related annoyance impacts under the project were determined to be less than significant. The smaller scale of construction for this alternative would likely result in a reduced frequency of nighttime work, and potential increased distances to the nearest sensitive uses. Therefore, vibration-related annoyance impacts under this alternative would be reduced as compared to the project and would remain less than significant. With respect to vibration-related damage, the worst-case closest construction activities would generally occur at the same approximate distances from existing buildings. Therefore, as is the case with the project, construction activities for the Existing Zoning Alternative would be expected to result in vibration levels below the applicable damage criteria for nearby buildings. Damage-related vibration impacts for this alternative would therefore be similar to those disclosed for the project, and would be less than significant.

Regarding aircraft noise-related impacts, this alternative would result in the siting of new multi-family residential land uses within the 70 CNEL contour for SFO, as is the case with the project. Multi-family residential land uses are considered generally incompatible within the 70 CNEL contour according to the ALUCP . Under this alternative, the significant impact related to the siting of residential uses in areas with excessive aircraft noise would be slightly reduced as compared to the project because a smaller amount of housing would likely be developed within the 70 CNEL contour overall; however, as is the case with the project, the impact would remain potentially significant, and mitigation would be required. Project Mitigation Measure NOI-3 would require building materials be selected and residential units be designed such that interior noise levels would be below 45 dBA CNEL. With implementation of this mitigation measure, and adoption of a Local Agency Override, the siting of residential land uses in the areas proposed under this alternative would not result in the exposure of future residents to excessive aircraft noise, even though the project would be inconsistent with the noise compatibility policies from the ALUCP. Noise impacts related to aircraft noise would be considered less than significant with mitigation under this alternative, and similar to the project .

4.4.2.11 Population and Housing

Construction of the Existing Zoning Alternative would result in temporary increases to construction employment in the city due to the renovations needed to the shopping mall and the construction of up to 1,000 units. However, this would be to a lesser extent than the project due to a reduced construction period, and less overall construction. The demand for construction employment would be met within existing and future labor markets in the city and county, resulting in a less-than-significant impact related to population growth during construction.

The retail uses at the mall would be converted into an entertainment venue; however, the total building area would not change. Therefore, for purposes of this analysis, is assumed that employment at the project site would remain the same as existing conditions. Therefore, the Existing Zoning Alternative would not result in an indirect population increase or an increase in the demand for housing as a result in employment. However, the additional 1,000 housing units would induce a larger population in the city compared to existing conditions. Assuming the estimated household size for the project site of approximately 2.0 persons per household, the Existing Zoning Alternative would result in an increase of approximately 2,000 total residents within the city (compared to approximately 3,028 under Scenario B, which would include the maximum amount of on-site residential uses under the project). However, since this housing is considered within the assumptions of the Housing Element, this population growth is considered in regional planning forecasts. In addition, the number of new residents at the project site under this alternative would be less than under the project, which would result in a less-than-significant impacts related to unplanned growth and displacement. As a result, the Existing Zoning Alternative would not contribute to any cumulative population and housing impacts. As with the project, this project would result in a less-than-significant impact related to the displacement of residents or people.

4.4.2.12 Public Services

Fire

The Existing Zoning Alternative would result in an increase of approximately 2,000 total residents within the city (compared to approximately 3,028 under Scenario B, which would include the maximum amount of on-site residential uses under the project). An increase in the service population would be expected to increase the number of calls for fire protection and emergency services, putting strain on fire protection facilities and equipment. However, the increase in service population resulting from the Existing Zoning Alternative would be less than the project. Similar to the project, this impact would be reduced to a less-than-significant level with payment of the San Bruno development impact fee (DIF), a portion which would be used for public safety, including fire capital facilities and infrastructure. As such, Existing Zoning Alternative impacts on fire protection would be less than significant, and less than the project's impact, which would also be less than significant.

Police

As discussed above, the Existing Zoning Alternative would result in an increase of approximately 2,000 total residents within the city, less than the project. Therefore, the Existing Zoning Alternative would result in an increase demand for police department service, though less than for the project. The project site would still be served by the adjacent San Bruno Police Station at 1177 Huntington Avenue and the project would still be required to pay the DIF payment in accordance with San Bruno Municipal Code Chapter 12.260, a portion of which would go to public safety, such as police capital facilities and infrastructure including equipment (e.g., vehicles). Therefore, the impacts on police services resulting from the Existing Zoning Alternative would be similar though somewhat less than under the project. As such, Existing Zoning Alternative impacts on police protection services would be less than significant and similar to the project's impacts.

Schools

As shown below in Table 4-1, the Existing Zoning Alternative would generate an estimated 140 elementary school students, 60 middle school students, and 100 high school students. As discussed in Section 3.12, *Public Services*, the project could generate an estimated 212 elementary school students, 91 middle school students, and 151 high school students. Therefore, the Existing Zoning Alternative would have a lesser impact on school than the project. However, this impact would be similarly reduced to a less-than-significant level with the payment of developer fees, which are deemed to fully mitigate the impact of new development on school districts. As such, the Existing Zoning Alternative impacts would be less than significant, and less than the project's impacts.

Table 4-1. Estimated Students Generated in Multi-family Units in the City of San Bruno – Existing Zoning Alternative

School Type	Housing Units	Student Generation Rate [a]	Students
Elementary	1,000	0.14	140
Middle	1,000	0.06	60
High	1,000	0.10	100

[a] Decision Insite Team 2019.

Libraries

As discussed above, the Existing Zoning Alternative could generate approximately 2,000 total residents within the city which could increase usage of library facilities. As discussed in Section 3.12, *Public Services*, the San Bruno Public Library is sufficient for current and future library card holders in terms of circulation items. The Existing Zoning Alternative would generate fewer residents, and therefore fewer library users, than the project, and would have less of an impact on library services than the project. However, like the project, the Existing Zoning Alternative would also pay DIFs, which includes fees for libraries. As the San Bruno Public Library is sufficient in terms of current and future users and the alternative would still pay the DIF fee, the Existing Zoning Alternative impacts on library services would be less than significant but still less than the project's impact.

4.4.2.13 Recreation

Construction of the Existing Zoning Alternative would result in temporary increases to construction employment in the city due to the renovations needed to the shopping mall and the construction of up to 1,000 units. However, this would be to a lesser extent than the project due to a reduced construction period. As such, increased use of parks and recreational facilities from temporary increases in construction employment would be less than the project, and is not likely to result in the development of construction or expansion of recreational facilities that would adversely impact the environment.

The retail uses at the mall would be converted into an entertainment venue; however, the total building area would not change. Therefore, for purposes of this analysis, is assumed that employment at the project site would remain the same as existing conditions. Therefore, the Existing Zoning Alternative would not result in an indirect population increase or an increase in the demand for parks and recreational facilities due to an increase in employees on the project site. However, the additional 1,000 housing units would induce a larger population in the city compared to existing conditions. Assuming the estimated household size for the project site of approximately 2.0 persons per household, the Existing Zoning Alternative would result in an increase of approximately 2,000 total residents within the city (compared to approximately 3,028 under Scenario B, which would include the maximum amount of on-site residential uses under the project).

As shown in Table 3.11-2 in Section 3.11, *Population and Housing*, the Association of Bay Area Governments (ABAG) estimates that the population of San Bruno in 2025 is 42,630. As shown in Table 3.13-1, the City and surrounding region provide 191 acres of existing parkland, equating to 4.48 acres for every 1,000 residents, just shy of the City's goal of 4.5 acres for every 1,000 residents (General Plan Policy OSR-1). The City currently does not have plans to build or renovate existing parks that could serve the project (Gilli pers. comm.). Based on the City's goal of 4.5 acres for every 1,000 residents (General Plan Policy OSR-1), the Existing Zoning Alternative would require the provision of approximately 9 acres of parkland to serve the new residents and employees and their families. With implementation of the Existing Zoning Alternative, the city would continue to be slightly deficient in meeting its parkland to population ratio.

However, the number of new residents at the project site under this alternative would be less than under the project, and the Existing Zoning Alternative would still be required to provide park and recreational facilities and/or pay in-lieu fees as required by the City's DIF Ordinance, which provides a more streamlined calculation methodology to fund parkland acquisitions necessary to serve all new development in the City, including non-residential development. New facilities would be subject

to their own independent CEQA review. Therefore, payment of the DIF would address the Existing Zoning Alternative's share of the improvement and/or expansion of capital facilities and infrastructure, a need that has already been identified by the City. Unlike the project, however, this alternative would likely not provide on-site open space to meet additional on-site demand created for recreational facilities. As a result, the Existing Zoning Alternative would result a greater, but still less than significant impact to parks and recreational facilities as compared to the project.

4.4.2.14 Transportation

Under the Existing Zoning Alternative, the transportation environment internal to the site would remain largely unchanged and the bounding streets (El Camino Real, Sneath Lane, and Huntington Avenue) would only be altered by other development or city projects, such as the Southline project's extension of Sneath Lane and City's plan for a cycle track on Huntington Avenue. Housing construction internal to the site would eliminate some surface parking but would likely supply residential parking in its place. Residential construction could include minor alterations to internal roadways but it is anticipated that major access points on El Camino Real and Sneath Lane would remain unchanged. By leaving the transportation environment in largely the same condition as it exists today, the Existing Zoning Alternative would not introduce any new design hazards nor would it interfere with any transportation plans or policies.

The retail uses at the mall would be converted into an entertainment venue; however, the total building area would not change. Therefore, for purposes of this analysis, is assumed that employment at the project site would remain the same as existing conditions and retail customer trip generation would also be similar to existing conditions. The additional 1,000 housing units would generate new trips on top of those observed with existing conditions. The new trips would be more concentrated in the AM and PM peak hours compared to retail and entertainments trips which are spread across the day, with more peaking on weekday evenings and weekends. Some internalization could occur with people both living and working and or shopping on-site. This is likely to be a small fraction of the total retail and work trips associated with the Existing Zoning Alternative. Notwithstanding, overall vehicle trips associated with the site would be reduced with the Existing Zoning Alternative due to the reduction in square footage. Trips would be less concentrated in the peak hours than with the project, however, since office/R&D trips are more concentrated than home or retail trips. As a result, the Existing Zoning Alternative would also have a less than significant impact on freeway queueing, which occurs in the peaks.

Retail trips associated with the existing site are on average shorter than trip lengths associated with work and residential trips. However, by adding housing into a city and county that have a jobs-housing imbalance, the Existing Zoning Alternative is likely to reduce trip lengths regionally by providing options for people to live closer to where they work in San Bruno and other locations in San Mateo County. This potential reduction in VMT is even more likely given the denser, mixed-use, and transit-oriented nature of the Existing Zoning Alternative. The Existing Zoning Alternative is not nearly as dense nor as varied in its uses as the project, however, and would have lower internalization rates and mode shift potential as compared to the project. Therefore, the Existing Zoning Alternative would likely result in both higher total VMT and higher VMT per capita than the project, and would be less consistent with SB 743's intent by failing to create a dense, mixed-use environment in proximity to transit with the lack of R&D/Office job opportunities. The location, residential development floor-area-ratio, and residential parking supply (assuming it would be lower than city minimums) would qualify the Existing Zoning Alternative for VMT screening and

would therefore result in transportation impacts that are less than significant, but not less than those of the project.

4.4.2.15 Tribal Cultural Resources

The Existing Zoning Alternative would be located on the same project site as the project. Ground disturbance would be slightly reduced compared to the project due to the lack of demolition; however, ground disturbing and excavation activities associated with the new housing would still occur resulting in potential impacts to Tribal cultural resources. Therefore, potential impacts to archaeological resources and human remains that would occur under the project would also occur under the Existing Zoning Alternative but would be reduced. Such resources have the potential to be considered Tribal cultural resources; thus, implementation of CUL-2-A: Conduct Cultural Resource Awareness Training and Exploratory Trenching Prior to Project-Related Ground Disturbance and CUL-2-B: Stop Work if Buried Cultural Deposits are Encountered During Construction Activities would continue to apply to this alternative. Overall, impacts would be less than significant with mitigation, as with the project, but slightly reduced compared to the project due to the reduced extent of ground disturbance.

4.4.2.16 Utilities

Under the Existing Zoning Alternative, the amount of new development on the project site would be reduced compared to that of the project. Therefore, water consumption and wastewater generation would be reduced compared to the project. Without conducting detailed hydraulic modeling, which is not required for Alternative analysis under CEQA, it would be speculative to determine whether the utility improvements required for the project in Mitigation Measure UT-1-a, Off-site Water Facility Upgrades, Mitigation Measure UT-1-b, On-Site Water Facility Upgrades, and Mitigation Measure UT-1-c, Wastewater Facility Upgrades, would be required for the Existing Zoning Alternative. However, given the amount of new development (i.e., 1,000 housing units), it is conservatively concluded that similar mitigation would be needed. Therefore, impacts to water and wastewater infrastructure would be less than significant with mitigation, but less than those of the project due to the reduced demand.

As discussed in Section 3.16, *Utilities*, under the project, water shortages would occur during single dry years and multiple dry years due to projected supply shortfalls related to implementation of the Bay-Delta Amendment. However, the City can implement its Water Shortage Contingency Plan to reduce demand to the level of available supply. Because it would generate less water demand, the Existing Zoning Alternative would also have a less than significant impact on water supply, and a reduced impact compared to that of the project.

As discussed in Section 3.16, *Utilities*, under the project, sufficient landfill capacity exists to serve the project. Because it would generate less solid waste, the Existing Zoning Alternative would also have a less than significant impact on landfill capacity, and a reduced impact compared to that of the project.

Overall, impacts to utilities under the Existing Zoning Alternative would be less than significant with mitigation, and less than those of the project.

4.4.3 Reduced Density Alternative

4.4.3.1 Air Quality

Conflict with or Obstruct Implementation of the Air Quality Plan

The Reduced Density Alternative would reduce non-residential (office/R&D) development at the site by approximately 20 percent, resulting in less intensive construction and operational activities than the project. This alternative would result in similar land uses as the project, but total development would be less. The project would be consistent with the Air District's 2017 Clean Air Plan, because it would support the primary goals of the plan, include applicable control measures from the plan, and not disrupt any of the measures from the plan. As with the project, it is likely that the Reduced Density Alternative would not disrupt implementation of any of the measures for the plan and would include energy saving features and sustainability measures, such as incorporating on-site renewable energy systems and exceeding California's energy efficiency standards. Thus, similar to the project, the Reduced Density Alternative would not conflict with the applicable regional air quality plans, but with its lower density it would be less consistent with the aspects of the Air District's 2017 Clean Air Plan pertaining to promotion of transit-oriented development in vibrant urban communities. Therefore, impacts are considered less than significant, but somewhat greater than the project.

Construction Criteria Air Pollutant Emissions

As previously mentioned, the Reduced Density Alternative would reduce non-residential (office/R&D) development at the site by approximately 20 percent. Though the extent of construction for this alternative is not currently known with certainty, the smaller scale of new development would likely result in a shorter construction period than the project. However, in order to maintain a shorter construction period, it is likely that the daily construction activities under the Reduced Density Alternative would be similar to the project. Therefore, daily construction emissions generated by this alternative would most likely be similar to those of the project but with a shorter duration overall.

Project construction would generate exhaust emissions of nitrous oxides (NO_X) in exceedance of the Air District significance threshold. Similar to the project, development of the Reduced Density Alternative would likely exceed the Air District's significance thresholds during construction, requiring mitigation like Mitigation Measure AQ-2-A (Use Clean Diesel-Powered or Electric Equipment During Construction to Control Construction-related Emissions) and Mitigation Measure AQ-2-B (Implement Modified Bay Area Air District Basic Construction Mitigation Measures to Reduce Dust Emissions). Implementation of Mitigation Measures AQ-2-A and AQ-2-B would likely reduce emissions below applicable Air District thresholds. Therefore, with implementation of Mitigation Measures AQ-2-A and AQ-2-B, these impacts would be less than significant with mitigation, the same as the project.

Operational Criteria Air Pollutant Emissions

Similar to the project, operation of the proposed residential uses could result in air quality impacts, primarily from mobile and area sources. However, because this alternative would reduce non-residential (office/R&D) development at the site by approximately 20 percent, the scale of operational activities and associated emissions under this alternative would be smaller than the

project. While operational emissions under the Reduced Density Alternative would be lower than those of the project, they could potentially exceed the Air District's operational significance thresholds, and similar mitigation may be required, such as Mitigation Measure AQ-2-C (Require Low-VOC Coatings During Project Operation) and Mitigation Measure AQ-2-D (Replace Gas-Powered Landscape Equipment with Zero-Emissions Landscape Equipment). Similar to the project, implementation of Mitigation Measures AQ-2-C and AQ-2-D, would likely be sufficient to reduce operational emissions below the applicable thresholds. Therefore, impacts would likely be less than significant with mitigation.

With respect to construction and operations overlap, as shown in Table 3.1-10, the project would result in emissions of ROG that would exceed BAAQMD thresholds of significance. Thus, if construction and operations were to overlap under the Reduced Density Alternative, it is likely that emissions would also exceed the thresholds during the period of overlap. Similar to the project, Mitigation Measures AQ2-C and AQ-2-D would reduce emissions to levels below the applicable Air District thresholds, resulting in less than significant with mitigation, similar to the project.

Exposure of Sensitive Receptors to Carbon Monoxide Hot Spots

Traffic generated by the project would have the potential to create carbon monoxide (CO) hot spots at nearby roadways and intersections. Because the Reduced Density Alternative would reduce non-residential development at the site, it would generate fewer new vehicle trips than the project, resulting in lower CO concentrations at potential hot spots. Similar to the project, the Reduced Density Alternative would likely be consistent with the applicable congestion management plan and meet the Air District's screening criteria for CO hot spots, which is 44,000 vehicles per hour at affected intersections and 24,000 vehicles per hour at affected intersections where vertical or horizontal mixing is limited (i.e., a tunnel). Thus, as with the project, this impact would be less than significant.

Construction and Operational TAC Emissions

Diesel-fueled engines, which generate $PM_{2.5}$ and DPM, would be used during construction of the Reduced Density Alternative, similar to the project. In addition, during operations, the same types of $PM_{2.5}$ and DPM sources would be present but to a lesser degree. For example, there would likely be fewer vehicle trips, fewer emergency generators, and less laboratory space.

Multiple sensitive receptors are located within 1,000 feet of the project site. In addition, new receptors would live and work at the project area while subsequent phases of construction are ongoing. Construction of the Reduced Density Alternative may result in less construction over a shorter period of time, thus reducing the amount of emissions and duration of exposure compared to the project. As shown in Table 3.1-12, the project would result in significant health risks and PM2.5 concentrations for on-site receptors. For off-site receptors, there would be no exceedances of any Air District project-level health risk threshold. As with the project, impacts to existing off-site receptors would likely remain below significance thresholds. However, because the Reduced Density Alternative could also place new receptors on-site during ongoing construction, it may similarly result in significant health risks and PM2.5 concentrations from construction activities. Operational emissions would also contribute to health risks and PM2.5 concentrations, though to a lesser extent than the project. Mitigation Measures AQ-2-A, AQ-2-B, AQ-2-D, and AQ-3-A (Installation of High-Efficiency Air Filtration Systems) would likely be required to reduce emissions associated with this alternative. Nevertheless, even with mitigation, health risks and PM2.5

concentrations would likely exceed applicable thresholds. Therefore, this impact would remain significant and unavoidable, similar to the project.

Exposure of Sensitive Receptors to Asbestos During Construction

As with the project, asbestos impacts could occur if demolition of existing buildings containing asbestos or disturbance of any features exposes workers. The Reduced Density Alternative would comply with Air District's Regulation 11, Rule 2, which would control emissions of asbestos to the atmosphere during demolition activities. Accordingly, this impact would be less than significant, the same as the project.

Objectionable Odors

Similar to the project, the Reduced Density Alternative does not propose any odor-generating facilities, such as those identified by the Air District in its CEQA Guidelines (BAAQMD 2023: Table 5-4). Nonetheless, construction of this alternative may generate odors associated with diesel exhaust, asphalt paving, and the use of architectural coatings and solvents. During operation, odors could arise from emergency generator testing and maintenance, activities at the proposed laboratory uses, and vehicle exhaust and the reapplication of architectural coatings. Similar to the project, any odors would be limited to areas adjacent to the building and would not affect a substantial number of people. Additionally, the Reduced Density Alternative would comply with Bay Area Air District Regulation 7, ensuring that any odors from construction and operation would not exceed the Air District's general odor limitations or specific limitations on odorous compounds. Because the Reduced Density Alternative does not propose any odor-generating facilities and would not be expected to exceed the applicable Air District threshold, this impact would be less than significant, the same as the project.

4.4.3.2 Biological Resources

Under the Reduced Density Alternative, there will be similar demolition and type of construction activities to those of the project, however, the overall density of non-residential uses would be reduced. With fewer buildings and more open space developed in Flex Zone II, less excavation would be required in this area under this alternative, minimizing the footprint of construction activities. Although lessened, associated construction would remain similar to that of the project and have similar disturbance to biological resources from tree removal. As such, potential impacts to biological resources that would occur under the project would also occur under the Reduced Density Alternative; thus, implementation of Mitigation Measure BIO-1-A: Preconstruction Nesting Bird Surveys and Buffer Areas, Mitigation Measure BIO-4-A: Lighting Measures to Reduce Impacts on Birds and Mitigation Measure BIO-4-B: Building Design Measures to Minimize Bird-Strike Risk would continue to apply to this alternative. Overall, impacts would be less than significant with mitigation, as with the project, but slightly reduced compared to the project due to the reduced extent of construction.

4.4.3.3 Cultural Resources

The Reduced Density Alternative includes similar demolition and type of construction activities to those of the project, however, the overall density of non-residential uses would be reduced. With fewer buildings and more open space developed in Flex Zone II, less excavation would be required in this area under this alternative, , minimizing the depth of ground disturbance and the footprint of construction activities. Although lessened, associated construction would remain similar to that of the project and have similar disturbance of the extant on-site memorial and commemorative garden. As such, potential impacts to historical resources, archaeological resources, and human remains that would occur under the project would also occur under the Reduced Density Alternative; thus, implementation of Mitigation Measure CUL-1: Relocate and Incorporate the Existing Memorial and Commemorative Garden on the Property; CUL-2-A: Conduct Cultural Resource Awareness Training and Exploratory Trenching Prior to Project-Related Ground Disturbance; and CUL-2-B: Stop Work if Buried Cultural Deposits are Encountered During Construction Activities would continue to apply to this alternative. Overall, impacts would be less than significant with mitigation, and less than those of the project.

4.4.3.4 Energy

The Reduced Density Alternative would reduce by approximately 20 percent the non-residential (office/R&D) development at the project site. Under the Reduced Density Alternative, less construction activities would be required for the reduced building footprint. This would reduce the amount of energy consumed during construction, but would not eliminate the impact. Mitigation Measure AQ-2-A would continue to apply to the Reduced Density Alternative. The Reduced Density Alternative would have a lesser impact than the project's less than significant with mitigation energy impacts.

Operation of the Reduced Density Alternative would generate fewer vehicle trips than the project because there would be fewer employees at the project site, and thus would consume less energy in the form of fuel from on-road mobile sources. In addition, due to the reduced size of the non-residential buildings, less energy would be consumed by the land uses in the form of electricity, stationary sources, and landscaping activities, and indirectly through waste and wastewater generation. As with the project, the Reduced Density Alternative would be designed to meet Leadership in Energy and Environmental Design (LEED) Gold certification for the R&D/Office buildings, incorporate on-site renewable energy resources, efficient-flow and flush fixtures, smart metering, leak detection systems, water re-use for low maintenance and drought tolerant landscaping, electric vehicle charging stations, TDM measures, and all-electric building design, including lighting and the HVAC and mechanical systems. Operation of the Reduced Density Alternative would result in reduced amount of energy consumption compared to the project. Accordingly, operational energy consumption under the Reduced Density Alternative would be less than significant and less than that of the project. No mitigation would be required.

4.4.3.5 Geology, Soils, and Paleontology

Under the Reduced Density Alternative, demolition, grading, excavation, or construction activities at the project site would be similar to the project. The overall density of non-residential development would be reduced. As the overall project footprint would be the same as the project, all impacts related to geology and soils would be the same. The mitigation measures related to paleontological resources would still be required and in general impacts would be the same as those of the project, which would be less than significant with mitigation. Overall, impacts from the Reduced Density Alternative would be less than significant with mitigation, same as the project.

4.4.3.6 Greenhouse Gases

Generation of GHG Emissions During Construction and Operation

The Reduced Density Alternative would reduce non-residential (office/R&D) development at the site by approximately 20 percent, resulting in less intensive construction and operational activities. This alternative would result in similar land uses as the project, but total development would be less. As a result, construction and operational GHG emissions under the Reduced Density Alternative are expected to be lower than those resulting from the project.

As discussed in Section 3.6, *Greenhouse Gases*, the significance of the Project's GHG impact is determined based on its consistency with the Air District's land use Threshold Option A design elements. It is currently unknown whether the Reduced Density Alternative would be consistent with the design elements outlined as part of the Air District's land use Threshold Option A. Because consistency with this design elements requires a detailed assessment of a project's features, it cannot be determined whether future development would be consistent with or conflict with the plan. The level of detail necessary to determine consistency with the Air District's land use Threshold Option A is greater than the level of detail that is appropriate for analyzing a project's alternatives under CEQA. However, it is likely that this alternative would result in design features similar to those of the Project and be consistent with the Threshold Option A design elements. This impact is expected to be less than significant, similar to the Project.

Conflicts with Applicable Plans and Policies

It is currently unknown whether the Reduced Density Alternative would conflict with any applicable plans or policies adopted to reduce GHG emissions, because there are no specific development projects consistent with this alternative proposed for the site. Because consistency CARB's 2022 Scoping Plan and Plan Bay Area 2050 requires a detailed assessment of a project's features, it cannot be determined whether future development would be consistent with or conflict with these plans. The level of detail necessary to determine consistency with these plans is greater than the level of detail that is appropriate for analyzing a project's alternatives under CEQA. However, it is likely that this alternative would result in design features similar to those of the Project and be consistent with CARB's 2022 Scoping Plan and Plan Bay Area 2050, although by failing to implement as dense of a mixed-use project in proximity to transit, it would not, to the same extent as the project, advance Plan Bay Area 2050 objectives, nor would it help implement CARB's 2022 Scoping Plan or attainment of 2030 and 2045 statewide GHG targets to the same extent as the project. This impact would be greater than the project, although would remain a less than significant impact.

Hazards and Hazardous Materials

Under the Reduced Density Alternative, excavation would be shallower and less extensive, requiring less excavation than the project. In addition, a portion of the flex zone would be developed with publicly accessible open space. Otherwise, all other components of the Reduced Density Alternative would be similar to the project including utility improvements. Further, the Reduced Density Alternative would be constructed at the same location as the project.

The Reduced Density Alternative would be implemented within the same general footprint as the project and therefore, the potential to encounter contaminated soil and/or groundwater during ground disturbance activities and hazardous building materials during demolition would exist. As such, future housing development associated with the Reduced Density Alternative would be required to consider conclusions and implement recommendations included in various site-specific investigations conducted (previously) within the project footprint (described in Section 3.7, Hazards and Hazardous Materials, of this EIR). Furthermore, as there is a potential for exposure to contaminated soil, contaminated groundwater and hazardous building materials, implementation of Mitigation Measures HAZ-2-A, HAZ-2-B and HWQ-1 would still be required. Similar to the project, future development would be required to notify the San Mateo County Environmental Health Division of any excavation or redevelopment on the Sears Automotive Center/Sears #1478 site. Impacts associated with foreseeable upset and accident conditions involving the release of hazardous materials and the Reduced Density Alternative being located on a Cortese List site would be less than significant.

The Reduced Density Alternative would involve less excavation but would still require the routine handling of hazardous materials. Therefore, the handling of hazardous materials would still be subject to applicable regulations for both construction and operational phases. Furthermore, operational use of hazardous materials under the Reduced Density Alternative would be similar to the project. R&D tenants would still be required adhere to all applicable federal, state and local regulations for qualifying hazardous materials, seek consultation with the San Mateo County Environmental Health Department, and apply for applicable permits for regulated substances (due to the potentially toxic, flammable, or explosive characteristics of these materials). Impacts associated with the routine transport, use, or disposal of hazardous materials would be less than significant.

4.4.3.7 Hydrology and Water Quality

Under the Reduced Density Alternative, excavation would be shallower and less extensive. With fewer buildings and more open space developed in Flex Zone II, less excavation would be required in this area under this alternative. . In addition, approximately 3 acres (roughly half) of the flex zone would be developed with publicly accessible open space. Otherwise, all other components of the Reduced Density Alternative would be similar to the project including utility improvements. Further, the Reduced Density Alternative would be constructed at the same location as the project. The Reduced Density Alternative would be subject to the same hydrology and water quality regulatory requirements as the project. Therefore, impacts related to conflicting or obstructing a water quality control plan or sustainable groundwater management plan would be the same as the project.

Because the Reduced Density Alternative would be constructed at the same location as the project, surface water hydrology and drainage, water quality conditions, the underlying groundwater basin and conditions, and flood hazards would be the same as for the project. Therefore, impacts related to water quality, alterations in drainage patterns, flooding, or release of pollutants due to project inundation would be the same as the project.

Although the Reduced Density Alternative would involve more shallow excavation than the project, the Reduced Density Alternative would be constructed at the same location and groundwater is close to ground surface. Groundwater would be encountered and require temporary dewatering during construction. The extent of dewatering may be less under the Reduced Density Alternative than under the project. However, the same mitigation to reduce impacts on groundwater quality during construction dewatering would be required under the Reduced Density Alternative as under the project. Therefore, impacts on water quality would be less than significant with mitigation and reduced compared to the project.

In addition, infrastructure improvements associated with the Reduced Density Alternative would be similar to those described for the project. However, approximately 3 acres of the flex zone would be developed with publicly accessible open space, resulting in less overall impervious cover compared to the project. Impacts related to changes in impervious cover, groundwater recharge, peak storm drain flow, and flood hazards may be reduced compared to the project. Stormwater management facilities of the Reduced Density Alternative, like the project, are required to meet local, state and federal requirements for water quality treatment as well as flood control. The impact relating to alterations in drainage patterns resulting in erosion or flooding or exceeding the drainage system capacity would be the reduced compared to the project.

Cumulative impacts related to surface water hydrology, water quality, groundwater resources would be the same under the Reduced Density Alternative as under the project.

Overall, impacts to hydrology and water quality would be less than significant with mitigation under the Reduced Density Alternative, and reduced compared to the impacts of the project due to the reduced extent of ground disturbance and excavation.

4.4.3.8 Land Use

Overall, the Reduced Density Alternative would have the same land use impacts, though without providing some of the density benefits, as the project. Compared to the project, the Reduced Density Alternative would change the land use scenario of the project by reducing the square footage of non-residential uses (R&D/office/amenity, and retail) and increasing the amount of open space on the project site by approximately 3 acres, in the form of publicly accessible open space, instead. However, the overall site plan layout and other features would be similar to those of the project. The project's proposed circulation and infrastructure improvements, pedestrian/bicyclist and open space improvements, building heights and design, and TDM program would not change under the Reduced Density Alternative. The Reduced Density Alternative proposes the same type of land uses as the project, but in different quantities, which are consistent with the existing uses on the site and in the vicinity. Like the project, the Reduced Density Alternative would improve connectivity between the project site and local mass transit services, which would further promote connectivity between the project site and larger community.

Like the project, the Reduced Density Alternative falls within the 70 dB CNEL noise contour under the Airport Land Use Compatibility Plan, which states that residential uses are incompatible with noise levels above 70 dB. The Reduced Density Alternative would be required to receive a determination of inconsistency with the ALUC and require a Local Agency Override by the San Bruno City Council as a discretionary approval. In addition, similar to the project, the Reduced Density Alternative would be required to implement Mitigation Measure NOI-3 to ensure the alternative's inconsistency with the ALUCP's noise compatibility policies would not result in a significant environmental effect on the proposed residential uses. The Reduced Density Alternative would also be required to implement Mitigation Measure HAZ-5 to ensure consistency with the ALUCP's height limitations.

The Reduced Density Alternative would foster compact infill development and jobs in proximity to transit in order to reduce VMT and GHG emissions, consistent with the goals and objectives of Plan Bay Area 2050, although to a lesser extent than the project. In addition, the Reduced Density Alternative would be located on an infill site within an urbanized area and focus growth within a PDA and TPA/TRA. The Reduced Density Alternative would require the same General Plan and Zoning Ordinance amendments as the project, which would bring it into consistency with the General Plan goals and policies and Zoning Ordinance. The alternative would include pedestrian and bicyclists amenities and alternative transportation improvements consistent with the San Bruno Walk N' Bike Plan, BART Station Access Policy, San Bruno Transit Corridors Plan, and Grand Boulevard Initiative. Therefore, the Reduced Density Alternative would not conflict with plans or policies intended to reduce an environmental effect with implementation of identified EIR mitigation measures. Therefore, land use and planning impacts under the Reduced Density Alternative would be similar to those of the project, and would be less than significant with mitigation.

4.4.3.9 Noise

Under the Reduced Density Alternative, the non-residential development components of the Project would be reduced. Specifically, in Flex Zone II, the square footage of non-residential (i.e., R&D/office, amenity, and retail) uses would be reduced, reducing the project's overall net new non-residential development by approximately 20 percent. Publicly accessible open space would be developed in lieu of the additional office R&D and retail uses on approximately 3 acres (roughly half) of Flex Zone II. With fewer buildings and more open space developed in Flex Zone II, less excavation would be required in this area under this alternative. All other components of the Reduced Density Alternative would be similar to the project.

Overall, there would be a reduced number of buildings and development square footage under this alternative as compared to the project, resulting in less ground disturbance/grading. Because the amount of new development under this alternative would be somewhat reduced as compared to the project, the construction schedule for the project may be somewhat reduced. The closest distance between project construction areas and nearby off-site sensitive uses, however, would likely be the same or similar. In addition, similar equipment are generally used for most construction projects. Accordingly, combined noise levels from the three loudest pieces of equipment proposed for use during the worst-case construction phase under this alternative would likely be similar to the worst-case noise levels presented in the project noise analysis (refer to EIR Table 3.10-13). Overall, construction would likely result in similar worst-case noise levels during daytime hours as compared to the project (noting that the construction duration and intensity of construction activities may be slightly reduced as compared to the project). Therefore, daytime construction

noise under this alternative would likely be below the 85 dBA limit at 100 feet, and would therefore be expected to comply with allowable noise levels for daytime Construction in the City. Daytime construction noise impacts would be less than significant under this alternative (as was the case with the Project) and may be slightly reduced as compared to the impacts of the project.

The Reduced Density Alternative would also require nighttime construction, as is the case with the project. Based on the estimated noise levels for project non-daytime concrete pours (as shown in Table 3.10-14), and assuming worst-case non-daytime noise levels could be similar under this alternative (i.e., consist of primarily concrete pour activities), construction noise from concrete pours during non-daytime hours may be in excess of the applicable criterion for nighttime construction noise (i.e., 60 dBA at a distance of 100 feet). Note that the slightly reduced scale of construction for this alternative may result in a reduced frequency of nighttime work. In addition, due to the slightly reduced footprint of development, the distances to the nearest sensitive uses may be slightly increased. Therefore, non-daytime construction noise impacts may be slightly reduced under this alternative as compared to the project. However, because worst-case noise levels from non-daytime construction under this alternative could exceed thresholds, nighttime construction noise impacts would be significant under this alternative, as was the case for the project. Implementation of project Mitigation Measure NOI-1-A, which requires the development of a Construction Noise Control plan to reduce noise from nighttime construction, would reduce noise impacts from nighttime construction under this alternative. In addition, a modified version of NOI-1-B (to ensure the appropriate location for the temporary construction noise barrier is selected) may be required depending on the proximity of nighttime construction activities for this alternative to nearby sensitive uses. However, as is the case with the project, it will not be feasible in all instances for nighttime noise levels to be reduced to below the significance threshold of 60 dBA Leq at 100 feet, even if noise is somewhat reduced. The potential also still exists for nighttime construction pours to overlap with those of the Southline project. For these reasons, the Reduced Density Alternative would be expected to slightly reduce, but not avoid, the significant and unavoidable project-level and cumulative impacts related to construction noise during non-daytime hours.

With regard to construction haul truck noise, this alternative would likely result in similar, or slightly fewer, worst-case daily haul truck trips as the project, because the reduction in development may result in reduced grading and excavation. The Reduced Density Alternative would likely use the same haul routes as the project. Therefore, as is the case with the project, temporary noise impacts related to haul truck use for the project would be less than significant (and would likely be slightly reduced as compared to the project).

During operations, this alternative would be expected to generate slightly fewer vehicle trips than the project because there would be fewer employees at the project site. Therefore, traffic noise impacts from the Reduced Density Alternative would be reduced as compared to project-related impacts. As project-related traffic noise impacts were determined to be less than significant, traffic noise impacts from the Reduced Density Alternative would also be less than significant.

Under the Reduced Density Alternative, the types of rooftop heating and cooling equipment associated with new development would likely be similar to those evaluated under the project. However, due to the slightly reduced project footprint and 20 percent reduction in development, there would likely be slightly less equipment overall, and equipment may be located further from existing off-site receptors. Because specific details are not known about the types, locations, and noise levels of future equipment at this time (and based on the analysis conducted for the project), noise from equipment installed under this alternative may result in a greater than 10 dB increase in noise at the property plane of any property. Noise impacts related to mechanical equipment noise under this alternative could therefore be significant, even though they may be slightly reduced as compared to the project (due to the 20 percent reduction in office, R&D and retail uses developed). Implementation of project Mitigation Measure NOI-1-C would reduce this potentially significant impact related to heating, cooling, and ventilation equipment noise to a less-than-significant level. Therefore, mechanical equipment noise impacts under the Reduced Density Alternative would be less than significant with mitigation, as is the case with project (and may be slightly reduced under this alternative as compared to the project).

With regard to emergency generator testing, the Reduced Density Alternative would likely include a similar, or slightly smaller, number of on-site emergency generators due to the 20 percent reduction in office, R&D and retail uses to be developed. Therefore, emergency generator noise impacts would likely be similar, or slightly reduced, under this alternative as compared to the project. However, as with the project, even though the testing of emergency generators would be short term (i.e., 30 to 60 minutes each time) and intermittent (i.e., approximately once per month), noise from the testing of emergency generators under this alternative would likely result in noise levels in excess of applicable Municipal Code criterion in San Bruno because generator noise is generally quite loud. Noise impacts from emergency generator testing would likely be significant, and mitigation would be required. Implementation of project Mitigation Measure NOI-1-D would reduce the potentially significant impact related to emergency generator testing noise to a less-than-significant level. Therefore, noise impacts related to emergency generator testing under the Reduced Density Alternative would be less than significant with mitigation, as is the case with project (and may be slightly reduced under this alternative as compared to the project).

With regard to loading docks, the Reduced Density Alternative would likely result in a smaller number of loading docks and associated loading activities than would occur under the project because of the 20 percent reduction in office, R&D and retail uses to be developed. Therefore, as with the project, temporary and short-term project loading activity would result in less than significant noise impacts. Parking garages under this alternative would likely be similar to, or even smaller than, those associated with the project. Because parking garage noise for the project was estimated to be at least 26 dB below existing noise levels in the area, and parking garage noise would likely be similar, or slightly reduced, under this alternative, noise impacts related to parking activity would remain less than significant (and may be reduced as compared to the project).

With regard to vibration impacts, since the proximity of construction activities to nearby off-site structures would be similar or slightly increased under the Reduced Density Alternative (given the slight reduction in development), vibration impacts would likely be similar, or slightly reduced under this alternative as compared to the project. With respect to annoyance-related vibration during nighttime hours under the project, nighttime construction was estimated to be below the strongly perceptible threshold of 0.1 PPV in/sec from the Caltrans guidelines for the evaluation of vibration-induced annoyance; vibration-related annoyance impacts under the project were determined to be less than significant. The slightly reduced scale of construction for this alternative

may result in a reduced frequency of nighttime work, and potential increased distances to the nearest sensitive uses. Therefore, vibration-related annoyance impacts under this alternative may be slightly reduced as compared to the project, and would remain less than significant. With respect to vibration-related damage, the worst-case closest construction activities would generally occur at the same approximate distances from existing buildings. Therefore, as is the case with the project, construction activities for the Reduced Density Alternative would be expected to result in vibration levels below the applicable damage criteria for nearby buildings. Damage-related vibration impacts for this alternative would therefore be similar to those disclosed for the project, and would be less than significant.

Regarding aircraft noise-related impacts, this alternative would result in the same amount of residential development located in the same portions of the site as the project. Therefore, as was the case with the project, the Reduced Density Alternative would site new residential uses within the 70 CNEL contour for the airport. As a result, impacts related to aircraft noise at proposed residential land uses under the project would be significant, as was the case for the project. Project Mitigation Measure NOI-3 would be applied, which requires building materials be selected and residential units be designed such that interior noise levels would be below 45 dBA CNEL. With implementation of this mitigation measure, and adoption of a Local Agency Override, the siting of residential land uses at the project site under this alternative would not result in the exposure of future residents to excessive noise levels, even though the project would be inconsistent with the noise compatibility policies from the ALUCP. Noise impacts related to aircraft noise under the Reduced Density Alternative would be the same as those disclosed for the project and would be considered less than significant with mitigation.

4.4.3.10 Population and Housing

Construction of the Reduced Density Alternative would result in temporary increases to construction employment in the city due to the construction of housing and commercial uses. However, this would be to a lesser extent than the project due to a somewhat reduced construction period. The Reduced Density Alternative would result in the same amount of residential construction, but a 20 percent reduction in commercial uses, which would reduce the grading and excavation work. The demand for construction employment would be met within existing and future labor markets in the city and county, resulting in a less-than-significant impact related to population growth during construction.

The residential uses at the project site would be the same as under the project (2,690 residents under Scenario A and 3,448 residents under Scenario B). Therefore, the Reduced Density Alternative would have the same impact related to direct population increases at the project site as the project. However, the Reduced Density Alternative would result in approximately 20 percent fewer commercial uses than the project. Assuming an equivalent reduction in the number of employees, this would result in approximately net new 1,982 employees under Scenario A and approximately net new 1,259 employees under Scenario B. Assuming Scenario A (the conservative scenario for the amount of employees), the Reduced Density Alternative would result in an indirect population increase in San Bruno of approximately 529 new residents (compared to 662 new residents under the project).

Although employment would increase at the project site under the Reduced Density Alternative compared to existing conditions, the increase in employment, and indirect population increases, would be less than the project. Therefore, as with the project, impacts related to unplanned growth and displacement would be less than significant, but to a lesser extent. As a result, the Reduced Density Alternative would not contribute to any cumulative population and housing impacts.

4.4.3.11 Public Services

Fire

The Reduced Density Alternative would allow for the same amount of residential construction, 1,014 multi-family residential units, as the project (under Scenario A). Therefore, the increase in the service population, which would be expected to increase the number of calls for fire protection and emergency services, would be the same as that analyzed for the project. Similar to the project, the Reduced Density Alternative would require the payment of the San Bruno DIF, a portion which would be used for public safety, including fire capital facilities and infrastructure. Payment of the DIF would reduce impacts related to fire protection services to a less than significant level. As such, the Reduced Density Alternative impacts on fire protection would be less than significant, similar to the project's impact, which would also be less than significant.

Police

As discussed above, the Reduced Density Alternative allow for the same amount of residential construction as the project. Therefore, as with the project, the Reduced Density Alternative would result in an increase demand for police department service. The project site would still be served by the adjacent San Bruno Police Station at 1177 Huntington Avenue and the project would still be required to pay the DIF payment in accordance with San Bruno Municipal Code Chapter 12.260, a portion of which would go to public safety, such as police capital facilities and infrastructure including equipment (e.g., vehicles). Therefore, the impacts on police services resulting from the Reduced Density Alternative would be the same as under the project. As such, Reduced Density Alternative impacts on police protection services would be less than significant, same to the project's impacts.

Schools

As discussed above, the Reduced Density Alternative allow for the same amount of residential construction as the project. As such, the Reduced Density Alternative would also be expected to generate an estimated 212 elementary school students, 91 middle school students, and 151 high school students, as discussed in Section 3.12, Public Services. Therefore, the Reduced Density Alternative would have a similar impact on schools as the project, and this impact would likewise be similarly reduced to a less-than-significant level with the payment of developer fees, which are deemed to fully mitigate the impact of new development on school districts. As such, the Reduced Density Alternative impacts would be less than significant, the same as the project's impacts.

Libraries

The Reduced Density Alternative would allow for the same amount of residential construction as the project. As discussed in Section 3.12, Public Services, the San Bruno Public Library is sufficient for current and future library card holders in terms of circulation items. The Reduced Density Alternative would generate the same amount of residents, and therefore the same amount of library users, as the project, and would therefore have the same impact on library services as the project. Like the project, the Reduced Density Alternative would also pay development impact fees, which includes fees for libraries. As the San Bruno Public Library is sufficient in terms of current and future users and the alternative would still pay the DIF fee, the Reduced Density Alternative impacts on library services would be less than significant, the same as the project's impact.

4.4.3.12 Recreation

Construction of the Reduced Density Alternative would result in temporary increases to construction employment in the city due to the construction of housing and commercial uses. However, this would be to a lesser extent than the project due to a reduced construction period. The Reduced Density Alternative would result in the same amount of residential construction, but a 20 percent reduction in commercial uses, which would reduce the grading and excavation work. As such, increased use of parks and recreational facilities from temporary increases in construction employment would be less than the project, and is not likely to result in the development of construction or expansion of recreational facilities that would adversely impact the environment.

The residential uses at the project site would be the same as under the project (2,690 residents under Scenario A and 3,448 residents under Scenario B). Therefore, the Reduced Density Alternative would have the same impact related to direct population increases at the project site as the project. However, the Reduced Density Alternative would result in approximately 20 percent fewer commercial uses than the project. Assuming an equivalent reduction in the number of employees, this would result in approximately net new 1,982 employees under Scenario A and approximately net new 1,259 employees under Scenario B. Assuming Scenario A (the conservative scenario for the amount of employees), the Reduced Density Alternative would result in an indirect population increase in San Bruno of approximately 529 new residents (compared to 662 new residents under the project). Although employment would increase at the project site under the Reduced Density Alternative compared to existing conditions, the increase in employment, and indirect population increases, would be less than the project.

As shown in Table 3.11-2 in Section 3.11, *Population and Housing*, ABAG estimates that the population of San Bruno in 2025 is 42,630. As shown in Table 3.13-1, the City and surrounding region provide 191 acres of existing parkland, equating to 4.48 acres for every 1,000 residents, just shy of the City's goal of 4.5 acres for every 1,000 residents (General Plan Policy OSR-1). The City currently does not have plans to build or renovate existing parks that could serve the project (Gilli pers. comm.). Based on the City's goal of 4.5 acres for every 1,000 residents (General Plan Policy OSR-1), the Reduced Density Alternative would require the provision of approximately 15.52 acres of parkland to serve the new residents and employees and their families, same as the project. With implementation of the Reduced Density Alternative, the city would continue to be slightly deficient in meeting its parkland to population ratio.

However, the Reduced Density Alternative would still be required to provide park and recreational facilities and/or pay in-lieu fees as required by the City's DIF Ordinance, which provides a more streamlined calculation methodology to fund parkland acquisitions necessary to serve all new development in the City, including non-residential development. New facilities would be subject to their own independent CEQA review. Therefore, payment of the development impact fee would address the Reduced Density Alternative's share of the improvement and/or expansion of capital facilities and infrastructure, a need that has already been identified by the City. As a result, similar to the project, the Reduced Density Alternative would result in less than significant impacts to parks and recreational facilities.

4.4.3.13 Transportation

Under the Reduced Density Alternative, the transportation environment internal to the site would match the transportation network proposed with the Project. The Project does not introduce any new design hazards nor would it interfere with any transportation plans or policies. Rather the Project improves multi-modal travel through and around the project site. The same conclusions hold true for the Reduced Density Alternative.

The Reduced Density Alternative would still include a mix of uses; the exact mix and quantity of uses would determine how many trips would be internalized, but it is reasonable to assume that reduced density would result in a slightly smaller internalization rate than the Project. Even still, the Reduced Density Alternative would generate fewer trips than the Project. Density is reduced in Flex Zone II and thus, Huntington Avenue would likely have fewer trips under the Reduced Density Alternative than under the Project. With fewer trips, the Reduced Density Alternative would also have a less than significant impact on freeway queueing.

The Reduced Density Alternative would have lower total VMT than the project but similar VMT per capita results, but would be less consistent with SB 743's intent by failing to create as dense of a mixed-use environment in proximity to transit with fewer R&D/Office job opportunities. The location, floor-area-ratio, and parking supply (assuming a similar ratio as the project) would qualify the Reduced Density Alternative for VMT screening, just like with the project, and would therefore result in transportation impacts that are less than significant.

4.4.3.14 Tribal Cultural Resources

The Reduced Density Alternative includes similar demolition and type of construction activities to those of the project, however, the overall density of non-residential units would be reduced. With fewer buildings and more open space developed in Flex Zone II, less excavation would be required in this area under this alternative, minimizing the depth of ground disturbance and the footprint of construction activities. Although lessened, associated construction would remain similar to that of the project. As such, potential impacts to archaeological resources and human remains that would occur under the project would also occur under the Reduced Density Alternative; thus, implementation of Mitigation Measures CUL-2-A: Conduct Cultural Resource Awareness Training and Exploratory Trenching Prior to Project-Related Ground Disturbance and CUL-2-B: Stop Work if Buried Cultural Deposits are Encountered During Construction Activities would continue to apply to this alternative. Overall, impacts would be less than significant with mitigation, and less than those of the project.

4.4.3.15 Utilities

Under the Reduced Density Alternative, the amount of new development on the project site would be reduced compared to that of the project. Therefore, water consumption and wastewater generation would be reduced compared to the project. Without conducting detailed hydraulic modeling, which is not required for alternative analysis under CEQA, it would be speculative to determine whether the utility improvements required for the project in Mitigation Measure UT-1-a, Off-site Water Facility Upgrades, Mitigation Measure UT-1-b, On-Site Water Facility Upgrades, and Mitigation Measure UT-1-c, Wastewater Facility Upgrades, would be required for the Reduced Density Alternative. However, given the amount of new development, it is conservatively concluded that similar mitigation would be needed. Therefore, impacts to water and wastewater infrastructure would be less than significant with mitigation, but less than those of the project due to the reduced demand.

As discussed in Section 3.16, *Utilities*, under the project, water shortages would occur during single dry years and multiple dry years due to projected supply shortfalls related to implementation of the Bay-Delta Amendment. However, the City can implement its Water Shortage Contingency Plan to reduce demand to the level of available supply. Because it would generate less water demand, the Reduced Density Alternative would also have a less than significant impact on water supply, and a reduced impact compared to that of the project.

As discussed in Section 3.16, *Utilities*, under the project, sufficient landfill capacity exists to serve the project. Because it would generate less solid waste, the Reduced Density Alternative would also have a less than significant impact on landfill capacity, and a reduced impact compared to that of the project.

Overall, impacts to utilities under the Reduced Density Alternative would be less than significant with mitigation, and less than those of the project.

4.5 Comparison of Impacts

Table 4-1 compares the significant impacts of the project, No Project/No Build Alternative, Existing Zoning Alternative, and the Reduced Density Alternative. First, for each impact studied, it identifies the level of impact for the project and each alternative (e.g., no impact, less-than-significant impact, less-than-significant impact with mitigation, or significant and unavoidable impact, or significant and unavoidable impact with mitigation). Second, for each alternative and each impact, it indicates whether the resulting degree of impact would be similar to, less than, or greater than the project. In some cases, although both the project and the alternative would result in the same level of impact, the degree of that impact might differ.

Table 4-2. Comparison of Impacts under Project and Alternatives

Impact	Project	No Project/ No Build Alternative	Existing Zoning Alternative	Reduced Density Alternative
Air Quality				
Air Quality Plan Consistency	LTS	NI (less)	LTS (less)	LTS (less)
Criteria Air Pollutant Emissions				
Construction	LTS/M	NI (less)	LTS/M (less)	LTS/M (less)
Operation	LTS/M	NI (less)	LTS/M (less)	LTS/M (less)
Health Risks				
Criteria Air Pollutants	LTS/M	NI (less)	LTS/M (less)	LTS/M (less)
Toxic Air Contaminants	SU/M	NI (less)	LTS/M (less)	SU/M (less)
Odors	LTS	NI (less)	LTS (less)	LTS (less)
Biological Resources				
	LTS/M	NI (less)	LTS/M (less)	LTS/M (less)
Cultural Resources				
	LTS/M	NI (less)	LTS/M (less)	LTS/M (less)
Energy				
Construction	LTS/M	NI (less)	LTS/M (less)	LTS/M (less)
Operation	LTS	NI (less)	LTS (less)	LTS (less)
Geology, Soils, and Paleontology				
Construction	LTS/M	NI (less)	LTS/M (less)	LTS/M (similar)
Operation	LTS	NI (less)	LTS (similar)	LTS (similar)
Greenhouse Gases				
Construction	LTS	NI (less)	LTS (less)	LTS (less)
Operation	LTS	NI (less)	LTS (less)	LTS (less)
Hazards and Hazardous Materials				
	LTS/M	NI (less)	LTS/M (less)	LTS/M (less)
Hydrology and Water Quality				
	LTS/M	NI (less)	LTS/M (less)	LTS/M (less)
Land Use				
Divide an Established Community	LTS	NI (less)	LTS (similar)	LTS (similar)
Conflict with Plan	LTS/M	NI (less)	LTS/M (similar)	LTS/M (similar)
Noise				
Daytime Construction Noise	LTS	NI (less)	LTS (less)	LTS (similar)
Non-Daytime Construction Noise (project)	SU/M	NI (less)	SU/M (less)	SU/M (similar)
Non-Daytime Construction Noise (cumulative)	SU/M	NI (less)	SU/M (less)	SU/M (similar)
Operations	LTS/M	NI (less)	LTS/M (less)	LTS/M (similar)
Vibration	LTS	NI (less)	LTS (less)	LTS (similar)
Aircraft Noise	LTS/M	NI (less)	LTS/M (less)	LTS/M (similar)

Impact	Project	No Project/ No Build Alternative	Existing Zoning Alternative	Reduced Density Alternative
Population and Housing				
Unplanned Population Growth	LTS	NI (less)	LTS (less)	LTS (less)
Displacement of People or Housing	LTS	NI (less)	LTS (less)	LTS (less)
Public Services				
Fire Protection Services	LTS	NI (less)	LTS (less)	LTS (less)
Police Protection Services	LTS	NI (less)	LTS (less)	LTS (less)
Schools	LTS	NI (less)	LTS (less)	LTS (less)
Libraries	LTS	NI (less)	LTS (less)	LTS (less)
Recreation				
Parks	LTS	NI (less)	LTS (similar)	LTS (similar)
Transportation				
Vehicle Miles Traveled	LTS	NI (less)	LTS (similar)	LTS (similar)
Impacts Related to Design Features	LTS	NI (less)	LTS (similar)	LTS (similar)
Freeway Queueing	LTS	NI (less)	LTS (similar)	LTS (less)
Tribal Cultural Resources				
	LTS/M	NI (less)	LTS/M (less)	LTS/M (less)
Utilities and Service Systems				
Water/Wastewater	LTS/M	NI (less)	LTS/M (less)	LTS/M (less)
Stormwater	LTS/M	NI (less)	LTS/M (less)	LTS/M (less)
Solid Waste	LTS	NI (less)	LTS (less)	LTS (less)

Level of impact (comparison to Project)
NI = no impact; LTS = less than significant; LSM = less than significant with mitigation;
SU = significant and unavoidable

4.6 Environmentally Superior Alternative

Section 21002 of the State CEQA Guidelines requires lead agencies to adopt feasible mitigation measures or feasible environmentally superior alternatives in order to substantially lessen or avoid otherwise significant adverse environmental effects, unless specific social or other conditions make such mitigation measures or alternatives infeasible. CEQA also requires that an environmentally superior alternative be identified among the alternatives analyzed. In general, the environmentally superior alternative is the project that avoids or substantially lessens some or all of the significant and unavoidable impacts of the project (CEQA Guidelines Section 15126.6). If the no project alternative is found to be the environmentally superior alternative, the EIR must identify an environmentally superior alternative among the other alternatives.

The No Project/No Build Alternative would avoid all of the project's significant impacts. The Existing Zoning Alternative would avoid the project's significant air quality impact, and would reduce but would not avoid the project's significant impacts related to non-daytime construction noise. The Reduced Density Alternative would reduce, but not avoid, the project's significant air quality impact related to health risks from TACs. The Reduced Density Alternative would not reduce or avoid the project's significant impacts related to non-daytime construction noise. Therefore, the Existing Zoning Alternative is the environmentally superior alternative. However, it should be noted that although the Reduced Density Alternative would advance Plan Bay Area 2050 objectives to provide dense, mixed-use development in proximity to transit, with less density than the project, it would meet these objectives to a lesser extent than the project.

Chapter 5
Other CEQA Considerations

5.1 Significant and Unavoidable Environmental Impacts

Section 21100(b)(2)(A) of the California Environmental Quality Act (CEQA) requires that a Draft Environmental Impact Report (Draft EIR) identify any significant environmental effects that cannot be avoided if a project is implemented. Many impacts identified for the project would either be less than significant or could be mitigated to a less-than-significant level. However, the project would result in significant impacts that cannot be mitigated to less-than-significant levels; these impacts are listed below.

Based on the analysis provided in Chapter 3 of this Draft EIR, the project would have the following significant and unavoidable impacts.

Impact AQ-3: Health Risks from Toxic Air Contaminants (TACs). The project would result in the exposure of sensitive receptors to substantial TAC concentrations from the combined effects of construction and operation.[1]

The project would result in the exposure of sensitive receptors to substantial TAC and criteria pollutant concentrations during construction and operation. Construction activities associated with the project would generate diesel particulate matter (DPM) and particulate matter with a diameter of 2.5 microns or less (PM2.5) that could expose adjacent receptors to significant health risks. Similarly, onsite receptors would experience a significant PM2.5 impact from exhaust and fugitive dust emissions. The causes of the cancer risk threshold exceedance for onsite receptors are from future residential receptors being exposed to DPM during construction at the site and then to TACs for nearly 30 years during operations, specifically DPM from generator testing and truck traffic and laboratory-related TACs from onsite laboratory uses. The primary causes of the PM2.5 concentration exceedances are onsite off-road equipment activity, earthmoving activities, and vehicle travel during construction, which generates fugitive PM2.5 from resuspended road dust. Thus, the health risk results and PM2.5 concentrations would exceed the Air District's thresholds after the incorporation of **Mitigation Measures AQ-2-A**, **AQ-2-B**, **AQ-2-C**, **AQ-2-D**, and **AQ-3-A** and the project would result in a significant and unavoidable impact with respect to health risks and PM2.5 impacts. Therefore, even with mitigation, this would result in a ***significant and unavoidable*** impact.

[1] As discussed in Chapter 3, Section 3.1, *Air Quality*, the threshold language in Appendix G of the CEQA Guidelines, which is evaluated in the analysis, is "Would the project expose sensitive receptors to substantial pollutant concentrations?" Additional language is included here to provide context for the significant impact.

Impact NOI-1-A: Non-Daytime Construction Noise. Project construction would generate 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.

Construction noise from concrete pour activities during non-daytime hours was modeled to be in excess of the applicable City of San Bruno criterion for nighttime construction noise (i.e., 60 A-weighted decibels [dBA] at 100 feet from the noise source between 10:00 p.m. and 7:00 a.m.). **Mitigation Measure NOI-1-A** requires the development of a Construction Noise Control Plan for nighttime construction, which would include specific measures to reduce noise from non-daytime construction activity (e.g., locating equipment as far as possible from noise-sensitive uses, equipping equipment with mufflers and sound control devices to reduce noise). While this mitigation measure would reduce construction noise effects, it may not be possible to reduce noise levels during all non-daytime construction activities to less-than-significant levels. In addition, because construction activities would occur during non-daytime hours for an estimated 100 days during project construction, the frequency of the nighttime construction noise would be somewhat substantial. **Mitigation Measure NOI-1-B** requires the installation of a temporary construction noise barrier along the length of the project construction site near residential uses before nighttime construction activities within approximately 500 feet of those residential uses. While the installation of such a barrier would reduce noise from construction activities, the barrier may not reduce noise levels from all concrete pour activities to below the applicable significance criterion levels, even if noise is somewhat reduced. Therefore, even with mitigation, this would result in a ***significant and unavoidable*** impact.

Impact C-NOI-1: Cumulative Non-Daytime Construction Noise. The project, in combination with past, present, and reasonably foreseeable future projects, would result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in a local general plan or noise ordinance or applicable standards of other agencies.

It is possible that future cumulative projects within 500 feet of the project site may require construction activities outside standard daytime hours. Of note, according to the Final EIR prepared for the Southline project (State Clearinghouse No. 2020050452), nighttime concrete pours are anticipated as part of that project. While Phase 1 of the Southline project is nearly complete at the time of this EIR analysis, construction of future phases could overlap with construction of the project. Therefore, for the reasons stated under Impact NOI-1-A, and given the potential for non-daytime construction for the project to occur concurrently with that of other nearby projects, particularly the Southline project, a ***significant and unavoidable*** impact would occur.

5.2 Significant Irreversible Changes

Section 15126.2(d) of the CEQA Guidelines requires that a Draft EIR evaluate "significant irreversible environmental changes which would be caused by the project should it be implemented," and identifies irreversible environmental changes as those involving a large commitment of nonrenewable resources or irreversible damage resulting from environmental accidents.

Such significant irreversible environmental changes may include current or future uses of nonrenewable resources, secondary or growth-inducing impacts that commit future uses of nonrenewable resources, and secondary or growth-inducing impacts that commit future generations to similar uses. According to CEQA Guidelines Section 15126.2(d), irretrievable commitments of resources should be evaluated to ensure that such current consumption is justified. In general, such irreversible commitments include the use of resources such as energy and the materials to construct a project as well as the energy and natural resources (including water) that would be required to sustain the project and its inhabitants or occupants over the usable life of the project.

No significant environmental damage, such as that resulting from accidental spills or the explosion of a hazardous material, as a result of the project is anticipated with implementation of **Mitigation Measures HAZ-2-A**, **HAZ-2-B**, and **HWQ-1**. In addition, compliance with federal, state, and local regulations would ensure that construction and operation activities at the project site would not result in the release of hazardous materials into the environment and that associated impacts would be less than significant (Section 3.7, *Hazards and Hazardous Materials*). Under the proposed P-D zoning, biosafety level (BSL) four facilities would be prohibited throughout the project site and BSL 3 facilities would be prohibited in Safety Zone 4 identified in the Airport Land Use Compatibility Plan for the San Francisco International Airport (SFO ALUCP). As discussed in Chapter 3, Section 3.8, *Hydrology and Water Quality*, required water quality permit(s) would be obtained prior to discharge of dewatering water to the storm drain. Further, implementation of **Mitigation Measure HWQ-1** would require groundwater monitoring well installation and sampling prior to dewatering activity to ensure that there is no contamination prior to discharge. As such, no irreversible changes, such as those that may occur from construction of a large-scale mining project, or other industrial project, would result from development of the project.

Consumption of nonrenewable resources includes increased energy consumption, conversion of agricultural lands, and lost access to mining reserves. As discussed in Chapter 3, Section 3.0.7.2, *Agriculture and Forestry Resources*, the project site is in a developed, urban area of San Bruno. No existing agricultural lands would be converted to nonagricultural uses. In addition, as discussed in Section 3.0.7.3, *Mineral Resources*, the project site does not contain known mineral deposits and is not a locally important mineral resource recovery site; thus, development of the project would not result in the loss of access to mining reserves. As discussed in Section 3.4, *Energy*, demolition, and construction associated with the project would require the use of energy, including energy produced from nonrenewable resources. Construction-related energy usage and consumption would vary substantially depending on the level of activity, length of construction period, specific construction operations, types of equipment, and number of personnel. The project is estimated to consume approximately 225,234 million British thermal units (BTUs) over its approximately 7.5-year construction period. The project would use the most energy-efficient equipment available to meet state and local goals for criteria air pollutants and greenhouse gas (GHG) emissions reductions and would not have a measurable effect on regional energy supplies or on peak energy demand, resulting in a need for additional capacity. As discussed in Section 3.6, *Greenhouse Gases*, the project would be required to comply with, and implement, the Bay Area Air District's (Air District's) recommended best management practices (BMPs) during project construction, including but not limited to, the use of zero-emissions and hybrid-powered equipment to the greatest extent possible, the use of California Air Resource Board-approved renewable diesel fuel in off-road construction equipment and on-road trucks, recycle or salvage nonhazardous construction and demolition debris at least 15 percent more than the diversion requirement of Title 24, use locally sourced or recycled

materials for construction materials, and encouraging and providing carpools, shuttle vans, transit passes, and secure bicycle parking to construction workers. These BMPs would reduce the amount of fossil fuel consumed during construction activities and the energy intensiveness associated with new building materials and disposed construction and demolition waste by requiring construction contractors to implement the Air District's recommended BMPs. Additionally, as discussed in Section 3.1, *Air Quality*, **Mitigation Measure AQ-2-A** would require all off-road diesel-powered equipment greater than 50 horsepower during construction activities to be equipped wither Tier 4 Final engines, which are fuel efficient. Overall, as a temporary activity, construction of the project would not be considered inefficient or wasteful. Nonetheless, fossil fuels used during construction would represent an irreversible use of fuel.

Once operational, proposed land uses within the project site would generate vehicle trips, which would consume gasoline, diesel, natural gas, and electricity. As discussed in Chapter 3, Section 3.14, *Transportation*, the project would be consistent with CEQA Guidelines Section 15064.3, subdivision (b), concerning vehicle miles traveled (VMT). The project would be consistent with the intent of SB 743 as it would promote long-term sustainability based on denser infill development, reduced reliance on individual vehicles and improved mased transit, all with the goal of reducing GHG emissions, and consequently, energy consumption in the form of mobile vehicle fuel. In addition, the project would implement a transportation demand management program designed to meet a 25 percent reduction in vehicle trips in accordance with City/County Association of Governments of San Mateo County (C/CAG) requirements for transit-oriented developments, which would reduce VMT and energy consumed through mobile vehicles. Nonetheless, the use of gasoline, diesel, natural gas, and electricity (depending on its source) to power vehicles with the project would represent an irreversible use of those resources. The project would also result in the consumption of electricity for operational uses such as power, heating, cooling, and landscaping activities. Electricity to be used during project operations would be provided by Peninsula Clean Energy (PCE), whose power mix comes from renewable and nonrenewable energy sources, including solar, wind, geothermal, biomass and biowaste, and hydroelectric generation resources. Therefore, to the extent that electricity supplying the project comes from renewable sources (e.g., hydropower, sun, wind, geothermal), it would not represent an irreversible use of resources. To the extent that electricity supplying the project comes from nonrenewable sources (e.g., fossil fuels), it would represent an irreversible use of those resources. The project would not require the construction of major new utility lines to deliver energy because these services are already provided in the area. The project would require new and upgraded water, wastewater, and storm drain pipelines within and adjacent to the project site. Buildout of the project would require the use of nonrenewable materials such as steel, copper, and other metals. The source metals used, unless they come from recycled materials, would represent an irreversible use of resources.

Project construction and operation would require the irreversible commitment of limited, slowly renewable, and nonrenewable resources. However, the consumption of such resources would not be considered substantial or wasteful. Therefore, although irreversible environmental changes would result from the project, such changes are concluded to be less than significant, and the limited use of nonrenewable resources that would be required by project construction and operation is justified.

5.3 Secondary Impacts

Section 15126.4(a)(1)(D) of the CEQA Guidelines states that "if a mitigation measure would cause one or more significant effects in addition to those that would be caused by the project as proposed, the effects of the mitigation measure shall be discussed but in less detail than the significant effects of the project as proposed." The following discussion examines the potential secondary impacts that could result with the implementation the mitigation measures proposed for the project.

5.3.1 Air Quality

Mitigation Measures AQ-2-A, **AQ-2-B**, **AQ-2-C**, **AQ-2-D**, and **AQ-3-A** are included in Chapter 3, Section 3.1, *Air Quality*, to reduce the project's air quality impacts during construction and operation. Specifically, **Mitigation Measure AQ-2-A** would require the construction contractors to use EPA-approved Tier 4 Final engines or cleaner for off-road diesel-powered equipment; **Mitigation Measure AQ-2-B** would require construction contractors to implement Bay Area Air District basic BMPs to reduce construction-related fugitive dust; **Mitigation Measure A-2-C** would require the project applicant to use low-volatile organic compound (VOC) coating with a VOC content of 50 grams/liter or less to reduce reactive organic gas emissions; **Mitigation Measure AQ-2-D** would require the project applicant to provide education for tenants concerning zero-emissions landscape equipment and require that all tenants only use electric landscaping equipment throughout project operation; and **Mitigation Measure AQ-3-A** would require that all heating, ventilation, and air conditioning (HVAC) systems installed in new residential units within the project site use Minimum Efficiency Reporting Value (MERV) 13 air filters, or equivalent. These mitigation measures would ensure that construction equipment, construction activities, landscaping equipment and materials would be of a type that would reduce air quality impacts during construction and operation of the project. Implementation of these mitigation measure would not result in significant adverse secondary impacts.

5.3.2 Biological Resources

Mitigation Measures BIO-1-A, **BIO-4-A**, and **BIO-4-B** are included in Chapter 3, Section 3.2, *Biological Resources*, of this Draft EIR to reduce impacts on birds during construction and operation of the project. Specifically, **Mitigation Measure BIO-1-A** would require surveys for nesting birds to occur on the project site and in buffer areas prior to construction activities; **Mitigation Measure BIO-4-A** would require the applicant to identify building/lighting-related measures to minimize the effects of the building's lighting on birds; and **Mitigation Measure BIO-4-B** would require the applicant to identify measures related to the external appearance of the buildings to minimize the risk of bird strikes. These mitigation measures would ensure that nesting birds are protected during construction activities and that the design of the buildings would minimize impacts on birds. Implementation of these mitigation measure would not result in significant adverse secondary impacts.

5.3.3 Cultural Resources

Mitigation Measures CUL-1, **CUL-2-A**, and **CUL-2-B** are included in Chapter 3, Section 3.3, *Cultural Resources*, of this Draft EIR to reduce impacts on cultural resources during construction and operation of the project. Specifically, **Mitigation Measure CUL-1** would facilitate the relocation of the existing onsite memorial and commemorative garden to ensure the retention of a physical marker of the historical resource; **Mitigation Measure CUL-2-A** would require a Worker's Environmental Awareness Program for the training of construction crews on cultural resources and procedures to follow in the event of a cultural resources discovery; and **Mitigation Measure CUL-2-B** would require work to be stopped if a significant archaeological resource is encountered during ground-disturbing activities. These mitigation measures apply at the design phase and during construction activities. If the memorial is relocated as part of implementing **Mitigation Measure CUL-1**, minor construction-related impacts could occur, including impacts on noise and air quality. However, such impacts would be temporary, would occur within the project site, and would be negligible compared to the overall scope of construction that is evaluated in this EIR. Therefore, implementation of these mitigation measure would not result in significant adverse secondary impacts.

5.3.4 Energy

Mitigation Measure AQ-2-A is included in Chapter 3, Section 3.4, *Energy*, of this Draft EIR to reduce impacts on energy use during construction activities. **Mitigation Measure AQ-2-A** is discussed in Section 5.3.1, *Air Quality*, and would not result in significant adverse secondary impacts.

5.3.5 Geology, Soils, and Paleontology

Mitigation Measure GEO-6 is included in Chapter 3, Section 3.5, *Geology, Soils, and Paleontology*, to reduce impacts on paleontological resources during ground-disturbing construction activities. Specifically, **Mitigation Measure GEO-6** would require training to project personnel regarding procedures to following upon the discovery or suspected discovery of paleontological resources. This mitigation measure would ensure that workers are properly trained during construction. Implementation of this mitigation measure would not result in significant adverse secondary impacts.

5.3.6 Greenhouse Gases

Mitigation Measures AQ-2-A, **AQ-2-C**, and **AQ-2-D** are included in Chapter 3, Section 3.6, *Greenhouse Gases*, to reduce the project's air quality emissions during construction and operation. These mitigation measures are discussed in Section 5.3.1, *Air Quality*, and would not result in significant adverse secondary impacts. Impacts related to GHG emissions would be less than significant and no mitigation measures are required; therefore, there would be no secondary impacts associated with the implementation of mitigation measures.

5.3.7 Hazards and Hazardous Materials

Mitigation Measures HAZ-2-A, **HAZ-2-B**, **HAZ-5**, and **HWQ-1** are included in Chapter 3, Section 3.7, *Hazards and Hazardous Materials*, to reduce risks associated with the handling of contaminated soil and hazardous materials, and to ensure compliance with airport height restrictions during construction and operation of the project. **Mitigation Measure HAZ-2-A** would require the preparation of a soil management plan prior to any construction and prior to the issuance of any grading permit; **Mitigation Measure HAZ-2-B** would require a Hazardous Building Materials Survey be conducted before the issuance of any demolition permit; **Mitigation Measure HAZ-5** would require compliance with the SFO ALUCP's airspace compatibility policies, as well as the submission of a plan with equipment heights to the Director of Community Development. **Mitigation Measure HWQ-1** is discussed in Section 5.3.8, *Hydrology and Water Quality*, under water quality. These mitigation measures would ensure that plans are in place should environmental hazards be encountered during construction, and that construction equipment and buildings do not present hazards to air traffic. Implementation of this mitigation measure would not result in significant adverse secondary impacts.

5.3.8 Hydrology and Water Quality

Mitigation Measures HWQ-1 and **HWQ-3** are included in Chapter 3, Section 3.8, *Hydrology and Water Quality*, to address risks related to water quality and drainage capacity. Specifically, **Mitigation Measure HWQ-1** would require monitoring wells be installed for any proposed excavation and dewatering prior to and during construction activities. Wells may be drilled either on-site or in the public right-of-way or easement and would require a well permit with San Mateo County, an encroachment permit with the City of San Bruno, and the City may require decommissioning of the well following construction activity. Flush mounted well covers allow the wells to be unobtrusive. The installation of monitoring wells is short, usually taking approximately 1 day, and decommissioning about 2 days to remove or fill the well and restore the ground. The entire process is temporary and the ground disturbance is minimal. **Mitigation Measure HWQ-3** would require a site-specific survey to demonstrate that the Sneath Avenue stormwater system can adequately accommodate additional stormwater flow rates and volumes. This would require reviewing data, existing maps, reports, and topography, as well as conducting a physical inspection of the drainage system, analyzing site conditions (such as soil types, groundwater levels, and drainage outlets), and calculating runoff characteristics and drainage capacity. Physical disturbance associated with the survey would be minor and would not disrupt regular activities associated with the project site. These mitigation measure would apply before and during construction activities and, due to their generally unobtrusive and temporary nature, and the fact that they would be within the general envelope of construction, implementation would not result in significant adverse secondary impacts.

5.3.9 Land Use

Mitigation Measures HAZ-5 and **NOI-3** are included in Chapter 3, Section 3.9, *Land Use*, and addresses issues related to consistency with land use policies and plans. **Mitigation Measure HAZ-5**, which relates to equipment heights, and **Mitigation Measure NOI-3**, which relates to noise reduction, are discussed in the *Hazards and Hazardous Materials* and *Noise* sections. These mitigation measures would not result in significant adverse secondary impacts.

5.3.10 Noise

Mitigation Measures NOI-1-A, **NOI-1-B**, **NOI-1-C**, **NOI-1-D**, and **NOI-3** are included in Chapter 3, Section 3.10, *Noise*, to address issues noise resulting from construction or operation of the project. Specifically, **Mitigation Measure NOI-1-A** would require the development of a Construction Noise Control Plan to reduce noise from nighttime construction; **Mitigation Measure NOI-1-B** would require the installation of a temporary construction noise barrier in advance of any nighttime construction within approximately 500 feet of residential uses during the construction period. These mitigation measures pertaining to construction would not result in any significant adverse secondary impacts. Specifically, nothing would be constructed and no additional noise would be generated with implementation of **Mitigation Measure NOI-1-A**. In addition, although a sound wall may be constructed as part of **Mitigation Measure NOI-1-B**, this may be in the form of sound blankets hung on chain-link-style construction fencing. Hanging such sound blankets would not generate substantial noise and would take place during daytime hours. Similarly, if a solid sound wall was constructed in lieu of hanging sound blankets on construction fences, this would take place during daytime hours, and construction activities associated with the sound wall would be minimal. This activity would likely result in similar, or lower, daytime noise levels as compared to actual project construction (and would, therefore, result in noise levels below the daytime construction noise limit in San Bruno). For these reasons, these measures pertaining to project construction would not result in significant adverse secondary noise impacts.

Regarding operational noise from mechanical equipment, **Mitigation Measure NOI-1-C** would reduce potential noise impacts resulting from project heating, cooling, and ventilation equipment with the creation of a Noise Reduction Plan to ensure noise levels of equipment are below the applicable noise criteria, and; **Mitigation Measure NOI-1-D** would require the applicant to conduct a noise analysis to approximate noise levels from the testing of project-specific emergency generators and to create a Generator Noise Reduction Plan. Implementation of these measures would entail developing plans and completing equipment-specific analyses with specific performance-based metrics to ensure significant noise is not generated during mechanical equipment operation; no environmental impacts would result from implementation of these equipment-specific analyses and noise-reduction plans.

Lastly, **Mitigation Measure NOI-3** would require the applicant to implement a Noise Reduction Plan that determines the treatments and measures necessary to ensure interior noise levels in any habitable room associated with project residences would be 45 dBA Community Noise Equivalent Level (CNEL), or less. Implementation of this mitigation measure (based on the findings in the plan) may result in the use of different building materials in the construction of certain project components. However, the actual construction activities that would take place would not change as compared to general project construction activities (e.g., the installation of windows would still take place, even if those windows would be a higher sound transmission class as a result of this measure). For the reasons described here, mitigation measures related to noise and vibration would not result in significant adverse secondary impacts.

5.3.11 Population and Housing

Impacts related to population and housing would be less than significant and no mitigation measures are required; therefore, there would be no secondary impacts associated with the implementation of mitigation measures.

5.3.12 Public Services

Impacts related to public services would be less than significant and no mitigation measures are required; therefore, there would be no secondary impacts associated with the implementation of mitigation measures.

5.3.13 Recreation

Impacts related to recreation would be less than significant and no mitigation measures are required; therefore, there would be no secondary impacts associated with the implementation of mitigation measures.

5.3.14 Transportation

Impacts related to transportation would be less than significant and no mitigation measures are required. Therefore, there would be no secondary impacts associated with the implementation of mitigation measures.

5.3.15 Tribal Cultural Resources

Mitigation Measures CUL-2-A and **CUL-2-B** are included in Chapter 3, Section 3.15, *Tribal Cultural Resources*, to reduce impacts related to Tribal cultural resources during construction and operation of the project. These mitigation measures are discussed in Section 5.3.3, *Cultural Resources*. Implementation of these mitigation measures would not result in significant adverse secondary impacts.

5.3.16 Utilities

Mitigation Measures UT-1-A, **UT-1-B**, **UT-1-C**, and **HWQ-3** are included in Chapter 3, Section 3.16, *Utilities*, to reduce impacts related to utilities and service systems during construction and operation of the project.

Specifically, **Mitigation Measure UT-1-A** would require the project sponsor to upsize the existing pipeline upstream and downstream of Pressure Regulating Station RS20 (along Huntington Avenue) to 12 inches in diameter (approximately 520 linear feet of pipeline) to address high pipeline velocities. **Mitigation Measure UT-1-B** requires the onsite water distribution system to be designed and constructed to provide continuous looping at all times to ensure adequate supply, pressure, and fire protection coverage, including to hydrants on the west side of the project site. **Mitigation Measure UT-1-C** requires the project applicant to extend the proposed 30-inch HDPE sewer in Sneath Lane downstream from Seabiscuit Lane to Huntington Avenue; and **Mitigation Measure HWQ-3** is discussed in Chapter 3, Section 3.8, *Hydrology and Water Quality*. Construction work in roadways may require rerouting traffic movements or closing lanes for a short duration. Impacts on roadways would be reduced through implementation of a construction management plan and issuance of encroachment permits where required. Implementing these mitigation measures would require construction activity that would have an impact on the environment, including impacts on noise and air quality. However, such impacts would be temporary and expected to be completed within the course of several days. Impacts would occur on the project site or adjacent roadways and would be minor compared to the overall scope of construction that is evaluated in this EIR. Therefore, implementation of these mitigation measure would not result in significant adverse secondary impacts.

5.4 Growth-Inducing Impacts

CEQA Guidelines Section 15126.2(e) states that an EIR should discuss "…the ways in which the project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment." Growth can be induced in a number of ways, including through the elimination of obstacles to growth, through the stimulation of economic activity within the region including the generation of significant employment opportunities, or through precedent-setting action. CEQA requires a discussion of how a project could increase population, employment, or housing in the areas surrounding the project, as well as an analysis of the infrastructure and planning changes that would be necessary to implement the project.

This section of the EIR discusses the manner in which the project could affect growth in the City of San Bruno and the larger Bay Area. In accordance with the CEQA Guidelines Section 15126.2(e), this discussion of growth inducement is not intended to characterize the project as necessarily beneficial, detrimental, or of little significance to the environment. This growth inducement discussion is provided for informational purposes so that the public and local decision-makers have an appreciation of the potential long-term growth implications of the project. Although CEQA requires disclosure of growth inducement effects, an EIR is not required to anticipate and mitigate the effects of a particular project on growth in other areas. Growth inducement has the potential to result in an adverse impact if the growth is not consistent with or accommodated by the land use plans and growth management plans and policies for the area affected. Since the general plan of a community defines the location, type, and intensity of growth, it is the primary means of regulating development and growth in that community.

In discussing growth inducement, it is useful to distinguish between direct and indirect growth. Direct growth occurs on a project site as a result of new facilities (buildings) being constructed, or an increase in developed space. As discussed in Chapter 2, *Project Description*, direct growth associated with the project could amount up to approximately 111,950 to 211,950 square feet of new retail space, 1,014 to 1,514 multifamily residential units, 1,174,000 to 1,723,580 square feet of life science laboratory and office uses, and 55,000 to 69,000 square feet of amenity uses. The project could also construct a 125,000-square-foot, 170-room hotel. In total, the project would construct 2,169,041 to 2,330,461 square feet of net new development on the project site. The project would include two flex zones, which would allow a range of uses that may be constructed in these areas to provide flexibility for the multiyear project to respond to changing market conditions and user demand. The flex zones could be developed with a mix of life science laboratory and office, residential, retail, grocer, amenity, and hotel uses. The project would establish design guidelines and maximum allowable uses for both commercial and residential development, and a mix of uses could be developed as long as the maximum permitted overall development is not exceeded.

Indirect growth occurs beyond a project site but is stimulated by the project's direct growth. Indirect growth is tied to increased direct and indirect investment and spending associated, such as expenditure patterns of employees associated with the project, with the new direct growth. For example, if a project were implemented, future workers would spend money in the local economy, and the expenditure of that money would result in additional jobs. The indirect jobs generated by a project (referred to as the *multiplier effect*) tend to be relatively near the places of employment but may occur at more distant locales as well. When CEQA refers to induced growth, CEQA means all growth—direct, indirect, and otherwise defined.

As described in Chapter 2, Section 2.6.2, *Buildout Projections*, for the evaluation of the flexible land uses areas as part of the project, two land use scenarios have been defined for purposes of the EIR analysis: Scenario A (R&D Scenario) and Scenario B (Residential Scenario). Scenario A assumes the flex zones would be predominantly built out with life science laboratory and office uses, with some amenity uses, while Scenario B assumes that the flex zones would be built out with a mix of residential uses, with some life science laboratory and office uses, some retail uses, some amenity uses, and hotel uses. The scenarios represent a reasonably foreseeable range of development that would be expected to occur in the flex zones, and are intended to capture the full range of possible land uses that could be developed on the project site. The programmed area would remain the same in both scenarios. Refer to Chapter 2, *Project Description*, Table 2-2 and Table 2-3, for a detailed breakdown of land uses for Scenario A and Scenario B, respectively.

As discussed in Chapter 3, Section 3.11, *Population and Housing*, both scenarios are evaluated. As shown in Chapter 3, Table 3.11-4, Scenario B would result in 1,574 net new employees and 3,028 residents living in the 1,514 units at the project site. Including new employees who would also live in San Bruno, the project would induce a total of 3,448 new residents in San Bruno. However, due to the induced population from onsite employment, the project would result in more regional population and demand for housing. Therefore, impacts would vary, depending on the scenario. In general, when analyzing impacts from the onsite units, onsite residents, and population in San Bruno, Scenario B was used to determine impact levels. However, when analyzing impacts from the regional population growth and regional housing supply and demand, Scenario A was used to determine impact levels.

As discussed in Section 3.11, *Population and Housing*, Scenario A would generate up to 2,478 net new jobs onsite when accounting for the 2,244 existing employees who would no longer work at the project site with implementation of the project. The estimated employment growth would exceed the Association of Bay Area Governments (ABAG)'s employment growth projection for the City. However, employment impacts are largely social and economic impacts, and CEQA establishes that social and economic impacts are not considered significant impacts unless they contribute to, or are caused by, physical impacts on the environment (Public Resources Code [PRC] Section 21080). Thus, the project's exceedance of ABAG's employment growth projection for the City under Scenario A would not be, in and of itself, a significant impact when considered at a project level, and project employees would not directly create significant impacts related to population or housing demand. However, project employees could induce growth by generating population and an associated demand for housing (i.e., indirect growth). As discussed in Section 3.11, *Population and Housing*, using an average of 1.46 workers per unit, the project would generate approximately 1,697 new households regionally.

It is estimated that 19.5 percent of San Bruno's workforce also lives in San Bruno, while the remaining 80.5 percent live elsewhere in the Bay Area. Therefore, assuming that 19.5 percent of workers who work at the project site would also live in San Bruno, approximately 331 new households would be generated in the City. With an average 2.60 persons per household, the project's onsite employment could generate approximately 662 residents in San Bruno. According to ABAG projections, the addition of up to 662 residents in the City as a result of the project's onsite employment would represent approximately 16.8 percent of the anticipated population growth within the City between 2025 and 2035. Therefore, based on ABAG projections, indirect growth associated with the project would be within the range of anticipated growth for the City.

As discussed in Chapter 3, Section 3.11, *Population and Housing*, Scenario B would generate up to 1,514 residential units and a total onsite population of 3,028 using an average household size of approximately 2.0 persons per household. Based on ABAG projections, the addition of up to 3,028 new onsite residents in the City as a result of the project would represent approximately 77 percent of the anticipated population growth in the City between 2025 and 2035.

As mentioned previously, the onsite employment induced by the project would result in approximately 662 new San Bruno residents under Scenario A and approximately 420 residents under Scenario B. Housing units generated by the project on the project site are anticipated to increase the resident population of San Bruno by approximately 3,028 residents under Scenario B. Although the project would generate more employee-induced San Bruno residents under Scenario A, when added to the onsite population, Scenario B would result in the greatest amount of population growth in San Bruno. Therefore, Scenario B is the conservative scenario for population growth in the City. Assuming the worst-case scenario that none of the project employees would live onsite, which is unlikely, the project would result in approximately 3,448 new residents in San Bruno.

Based on ABAG projections, the residential population in San Bruno is expected to increase by 3,930 over the next 10 years. The addition of up to 3,448 new residents in the City as a result of the project (employment and onsite residents) would represent approximately 88 percent of the anticipated population growth in the City between 2025 and 2035. While this project is not specifically accounted for in the ABAG projections, it can be accommodated within the projected growth. In addition, this level of growth is consistent with the project site's designation as the largest housing opportunity site identified in the Housing Element and, therefore, considered as part of the growth accounted for in regional planning efforts.

As discussed previously, the project would induce demand for 1,697 housing units in the region as a result of onsite employment. Although the project would add up to 1,514 new residential units to the housing supply, there would be a 683-unit deficit in housing supplied by the project in San Bruno under Scenario A, compared to the demand created by the project in the region. However, the approximately 683-unit deficit across the region as a result of the project (as induced by onsite employees) could be accommodated by other allowable construction in the City and housing in the rest of the region. Within the City alone, the Housing Element evaluated the development of up to 2,552 new residential units within the 8-year planning period.

According to ABAG projections, the number of households in the Bay Area is expected to grow by 272,075 between 2025 and 2035. Therefore, the 683-unit demand deficit represents only a small fraction of the anticipated housing growth in the region between 2025 and 2035. Furthermore, it is reasonable to assume that only 19.5 percent of the employees who would be induced by the project would live in the City; therefore, the rest would seek housing elsewhere in the Bay Area. ABAG projects that the number of households will grow by 9.0 percent in the Bay Area, 7.5 percent in San Mateo County, and 8.3 percent in the City between 2025 and 2035. For the same period, the indirect housing demand generated by the project would be 0.62 percent of the projected household growth in the Bay Area and 9.4 percent of that in San Mateo County. On a regional basis, the project's demand for housing would not represent a significant share of the total housing growth projected by ABAG.

The project would result in infill development within an existing urban environment. As discussed in Chapter 3, Section 3.16, *Utilities*, infrastructure improvements required to serve the project would include new and upgraded water, wastewater, and storm drain pipelines within the boundaries of the project site. The required infrastructure improvements would consist of localized improvements intended to serve project-related demand. These improvements would not extend infrastructure into other unserved or underserved areas and, as such, would not indirectly generate population growth. The project is also located within a Priority Development Area and Transit Priority Area, an area identified by ABAG and the Metropolitan Transportation Commission as a priority area for accommodating regional growth.

Cumulative population and housing growth resulting from the project in combination with the reasonably foreseeable future projects (Table 5-1) and background growth is evaluated in Section 5.5.12, *Population and Housing*. As discussed therein, while the project alone would not exceed ABAG's employment growth forecasts for the City of San Bruno, cumulative projects and background growth would exceed the growth forecasts for both population and housing for the City. This would result in a significant cumulative impact when considered at the city level, but the project's contribution would be less than cumulatively considerable. The project and most of the cumulative projects in San Bruno would be located on infill sites and in proximity to many transit lines. The combination of the project and the reasonably foreseeable projects within San Bruno would not require an extension or expansion of roads, utilities, or infrastructures that would result in changes to the environment and constitute a significant impact. Furthermore, as shown in Chapter 3, Table 3.11-2, according to ABAG projections, the population of the Bay Area is expected to grow by 838,855 residents and the number of households is expected to grow by 272,075 between 2025 and 2035. The Bay Area is defined by the interconnectedness of its cities. Population, housing, and employment demographics are not confined to individual cities but are spread across the region. This interconnectedness is facilitated by a robust transportation system, including Bay Area Rapid Transit (BART), Caltrain, and various bus services, which enable easy movement between cities. Other cities in the Bay Area would reasonably be assumed to accommodate the population and housing growth associated with further buildout of San Bruno, just as San Bruno accommodates employment-related growth in other cities.

Furthermore, infill development near transit, like the project, brings several benefits that contribute to a more balanced jobs-housing ratio from a regional perspective. Infill development reduces the need for long commutes, as people can live closer to their workplaces. It can also stimulate local economies by attracting businesses and services to these areas. This concentration of economic activity supports local businesses and generates job opportunities within the neighborhood, further improving the jobs-housing balance. Focusing on infill development near transit promotes sustainable growth by utilizing existing infrastructure and reducing urban sprawl. It encourages higher-density living, which is more efficient in terms of land use and resource consumption. Infill development near transit is a strategic approach to improving the regional jobs-housing balance in the San Francisco Bay Area, consistent with the overarching goals and policies in *Plan Bay Area 2050*. The project represents the exact type of development that is widely recognized to further those goals. Therefore, while cumulative impacts related to population growth within San Bruno resulting from the implementation of the project, in combination with the reasonably foreseeable future projects, would be significant, the project's contribution would be less than cumulatively considerable.

5.5 Cumulative Impacts

This section provides an analysis of cumulative impacts of the project with other past, present, and reasonably foreseeable future projects producing related impacts, as required by CEQA Guidelines Section 15130. Cumulative impacts are defined in CEQA Guidelines Section 15355 as "two or more individual effects which when considered together, are considerable or which compound or increase other environmental impacts." A cumulative impact occurs from "the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time" (CEQA Guidelines Section 15355[b]).

5.5.1 Approach to Cumulative Impacts

The cumulative analysis determines first whether the overall long-term impacts of all considered projects would be cumulatively significant. If so, then the analysis determines whether the incremental contribution to the cumulatively significant impacts by the project would be "cumulatively considerable" and, thus, significant. Consistent with CEQA Guidelines Section 15130, the discussion of cumulative impacts in this Draft EIR focuses on significant and potentially significant cumulative impacts. Section 15130(b) provides, in part, the following.

> The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great as detail as is provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness, and should focus on the cumulative impact to which the identified other projects contribute rather than the attributes of other projects which do not contribute to the cumulative impact.

CEQA Guidelines Section 15130(b)(1) describes two approaches for characterizing cumulative impacts.

- **Project list.** A list of past, present, and reasonably foreseeable future projects producing related or cumulative impacts, including, if necessary, projects outside of the control of the agency.
- **Summary of projections.** A summary of projections contained in adopted local, regional, or statewide plan, or related planning document, that describes or evaluates conditions contributing to a cumulative effect. Such plans may include a general plan, regional transportation plan, or plans for the reduction of GHG emissions. This summary can be supplemented with additional information, including a regional modeling program.

The analyses in this Draft EIR employ both a list-based approach and a projections approach, depending on which approach best suits the individual resource topic being analyzed. For instance, the cumulative analysis of noise impacts considers individual projects that are anticipated in the vicinity. Such projects in combination with the project may result in cumulative noise effects. By comparison, the cumulative population and housing analysis relies on a projection of overall citywide and regional growth, along with consideration of reasonably foreseeable projects that may not already be accounted for in the growth projections.

The cumulative analysis for each resource topic is included in the sections below. These sections identify feasible mitigation measures, where necessary and appropriate to reduce the project's cumulatively considerable contributions to significant cumulative impacts to less than cumulatively considerable. These sections also identify those cumulative impacts for which the project's contribution would remain cumulatively considerable, even with implementation of feasible mitigation measures (as noted in Section 5.1, *Significant and Unavoidable Environmental Impacts*).

The reasonably foreseeable cumulative projects considered in the cumulative analyses that use a list-based approach are listed in Table 5-1 and shown on Figure 5-1. These include the following projects in the City of San Bruno: projects for which the City has received an application, approved projects, and projects under construction at the time of the Notice of Preparation (NOP). The list also includes known projects that are proposed, approved, or under construction within 0.5-mile radius of the project site and are under the jurisdiction of other agencies (e.g., the Southline project in South San Francisco and the State of California's high-speed rail project).

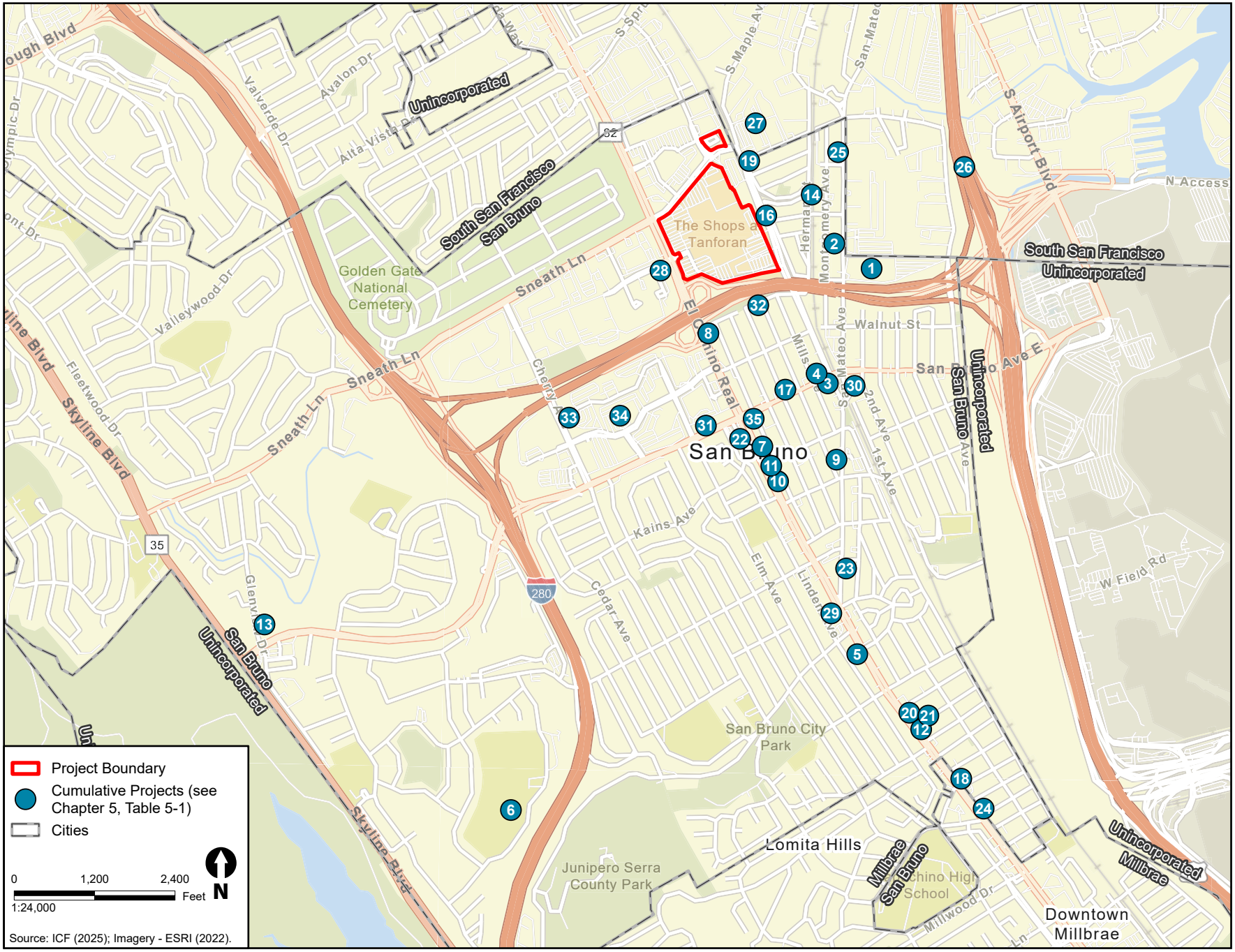

Figure 5-1
Cumulative Projects

Table 5-1. Cumulative Project List

No.	Project	Location	Type	Residential (# of units)	Commercial/ Retail (sf)	Hotel (# of rooms)	Description
1	1000 San Mateo Avenue	1000 San Mateo Avenue, San Bruno, CA	Warehouse	--	97,464	--	New warehouse and distribution facility for Amazon Logistics.
2	1065 San Mateo Avenue	1065 San Mateo Avenue, San Bruno, CA	Land use change	--	--	--	Land use change from trucking company to auto body and repair.
3	111 San Bruno Avenue W	111 San Bruno Ave West, San Bruno, CA	Mixed use	46 [a]	2,670	--	Five-story mixed-use building with 46 units and ground-floor retail.
4	170 San Bruno Avenue W	170 San Bruno Avenue W, San Bruno, CA	Mixed use	57 [a]	--	--	Five-story mixed-use building with 57 units and ground-floor retail.
5	271 El Camino Real	271 El Camino Real, San Bruno CA	Multifamily residential	35 [a]	--	--	Three-story 35-unit multifamily residential building.
6	300 Piedmont Avenue	300 Piedmont Avenue, San Bruno, CA	Single-family residential	155 [a]	--	--	155 single-family homes.
7	732–740 El Camino Real	732 El Camino Real, San Bruno, CA	Multifamily residential	134 [a]	--	--	134 units across new six-story multifamily residential building.
8	990 El Camino Real	990 El Camino Real, San Bruno, CA	Residential	24 [a]	--	--	Four-story residential building with parking on the ground floor.
9	Atlas Pizza & Lounge	637 San Mateo Avenue, San Bruno, CA	Permit upgrade	--	--	--	Use permit upgrade.
10	Auto Paddock Fence Installation	686 El Camino Real, San Bruno, CA	Fence	--	--	--	Installation of new 4-foot fence in existing parking lot.
11	Auto Paddock Roll-up Door	692 El Camino Real, San Bruno, CA	Permit request	--	--	--	Request for an Architectural Review Permit to remove an existing double swing door and replace it with a glass roll-up door.

No.	Project	Location	Type	Residential (# of units)	Commercial/ Retail (sf)	Hotel (# of rooms)	Description
12	Embarc San Bruno	120 El Camino Real, San Bruno, CA	Retail	--	--	--	Cannabis retail store.
13	Highland Ridge	2880 and 2890 San Bruno Avenue W, 850 and 860 Glenview Drive, San Bruno, CA	Multifamily residential	58 [a]	--	--	58 units across nine buildings. Solar all-electric, townhome-style condominium units.
14	High-Speed Rail – Phase 1	San Francisco, San Mateo, and Santa Clara Counties	High-Speed Rail	--	--	--	Phase 1 of the High-Speed Rail section from San Francisco to San Jose includes approximately 43–49 miles of mixed existing train infrastructure and new high-speed rail infrastructure extending through San Francisco, San Mateo, and Santa Clara Counties. This segment would include installation of four quadrant safety gates at the Linden Avenue crossing, approximately 50 feet east of the project site, and would also increase trains along the ROW.
15	Housing Element Update [c]	San Bruno, CA	Residential	3,165 [a]	--	--	Buildout of City of San Bruno's portion of San Mateo County's RHNA target for the 2023–2031 Housing Element period is 3,165 homes.
16	Huntington Avenue Bicycle and Pedestrian Improvements Project	Huntington Avenue, San Bruno, CA	Bicycle track and pedestrian improvements	--	--	--	A separated bicycle track and pedestrian improvements on Huntington Avenue.

No.	Project	Location	Type	Residential (# of units)	Commercial/ Retail (sf)	Hotel (# of rooms)	Description
17	Izzi Early Education	370 San Bruno Ave W, San Bruno, CA	Commercial	--	--	--	Remodel of existing building to add new doors, windows, fences, and upgrades to accessible path of travel. Improvements include changes to the parking lot.
18	Jack in the Box Façade and Interior Alterations	1700 El Camino Real, San Bruno, CA	Retail	--	--	--	Interior, facade, and landscaping improvements to existing drive-through facility.
19	JC Bruno	1292 Huntington Avenue, San Bruno, CA	Permit review	--	--	--	Architectural Review Permit is to legalize the existing covered outdoor patio dining space.
20	Kakoniktis Property	100 San Marco Avenue, San Bruno, CA	Single-family residential	1 [a]	--	--	New two-story home with JADU.
21	Kakoniktis Property	110 San Marco Avenue, San Bruno, CA	Single-family residential	1 [a]	--	--	New two-story home with JADU.
22	Mills Park Center Development	643–799 El Camino Real, 701–751 Camino Plaza, 711-777 Kains Ave., and 601-611 El Camino Real, San Bruno, CA	Mixed use	427 [a]	41,890 (grocery store) 4,000 (commercial)	--	427 units across two mixed-use buildings ranging in height from one to five stories.
23	Pacific Star King Lodge	444B San Mateo Avenue, San Bruno, CA	Permit request	--	--	--	Request for Use Permit to operate a conditional use, Private Community Facilities. Building permit review underway for major interior renovations and installation of elevator.
24	Red Dragon Supermarket	1600 El Camino Real, San Bruno, CA	Retail	--	11,510	--	Conditionally permitted grocery supermarket.

No.	Project	Location	Type	Residential (# of units)	Commercial/ Retail (sf)	Hotel (# of rooms)	Description
25	Red Rooster Taqueria	1225 San Mateo Avenue, San Bruno, CA	Land use change	--	--	--	Land use change to restaurant, with facade and sign improvements.
26	San Mateo 101 Managed Lanes North of I-380	San Mateo County (see description)	Highway lanes	--	--	--	Added managed lane in each direction of U.S. 101 between the U.S. 101/I-380 interchange in South San Francisco and the San Mateo/San Francisco County Line.
27	Southline	30 Tanforan Ave.; 40 Tanforan Ave.; 347 S. Maple Ave.; 349 S. Maple Ave.; 50 Tanforan Ave.; 54 Tanforan Ave.; 240 Dollar Ave.; 180 S. Linden Ave.; 160 S. Linden Ave.; 180 S. Linden Ave.; 315 S. Maple Ave.; 319 S. Maple Ave.; 325 S. Maple Ave.; South San Francisco, CA	Commercial	--	2,800,000	--	2.8 million square feet of office and life science space on 31 acres.
28	The Crossings – Auto Dealerships	1010 Admiral Court, San Bruno, CA	Commercial	--	--	--	Automotive dealership and service center.
29	Victory Honda Façade Alterations	345 El Camino Real, San Bruno, CA		--	--	--	Changes to building's architectural style.
30	Victory Toyota – Landscaping improvements	222 San Bruno Avenue E, San Bruno, CA	Permit review request	--	--	--	Request for Architectural Review permit for changes to parking lot landscaping.
31	View at San Bruno	850 San Bruno Ave West, San Bruno, CA	Multifamily residential	341 [a]	--	--	341 units across two multifamily residential buildings.

No.	Project	Location	Type	Residential (# of units)	Commercial/ Retail (sf)	Hotel (# of rooms)	Description
32	Wong Residence	997 Mason Avenue, San Bruno, CA	Single-family residential	1	--	--	Lot split to accommodate new dwelling unit via SB 9.
33	YouTube – Phase 1 Office Development (Bayhill Phase 1)	1000 and 900 Cherry Avenue, San Bruno, CA	Commercial	--	542,250	--	Two three-story office buildings totaling 440,000 square feet of office space, and a six-story office building measuring approximately 102,250 square feet in total area.
34	YouTube – Phases 2–5 (Bayhill Phases 2–5)	851 Cherry Ave.; 899 Cherry Ave.; 850 Cherry Ave.; 801-851 Traeger Ave.; 1250 Grundy Ln.; 1100 Grundy Ln.; 900 Cherry Ave.; 1150-1250 Bayhill Dr.; 950 Elm Ave.; 1111 Bayhill Dr.; 999-1001 Bayhill Dr.; 1050 Bayhill Dr.; San Bruno, CA	Residential; Office	573 [a]	3,471,620		
35	Zorek	799 El Camino Real, San Bruno, CA	Permit review	--	--	--	Architectural review permit.
	Total	**--**	**--**	**2,166** [a,b]	**6,971,404**	**--**	**--**

Source: City of San Bruno 2025

[a] The units included in this table are presented for each project for informational purposes. However, these projects are included as either approved projects or opportunity sites in the City's Regional Housing Needs Allocation (RHNA) of 3,165 total units. Since the 3,165 units are included in this table as Project No. 15 (Housing Element Update), the units for individual projects have been netted out of the total cumulative project units to avoid double-counting.

[b] The total number of units includes the 3,165 units under the Housing Element Update (Project No. 15), plus the reasonably foreseeable projects that were not considered in the Housing Element Update. In addition, the Housing Element Update assumed that 1,002 units would be constructed at the project site. Therefore, 1,002 units have also been netted out of the total housing units since they are included as part of the project and not as part of the cumulative project total.

Note that Project No. 15, the Housing Element, is not shown because it includes projected housing throughout the City.

sf = square feet; ROW = right-of-way; RHNA = Regional Housing Needs Allocation; JADU = Junior Accessor Dwelling Unit; SB = Senate Bill

5.5.2 Air Quality

The cumulative geographic context for air quality is the San Francisco Bay Area Air Basin (SFBAAB). The cumulative geographic context for health risks and odors is the immediate vicinity of the project site (i.e., within approximately 1,000 feet).

Each cumulative impact addresses the topics evaluated in the corresponding project impacts in Chapter 3, Section 3.1, *Air Quality*, of this EIR. For example, Impact C-AQ-1 addresses cumulative impacts with respect to Impact AQ-1, Impact C-AQ-2 addresses cumulative impacts with respect to Impact AQ-2, and so on.

Impact C-AQ-1: The project, in combination with past, present, and reasonably foreseeable future projects, would not conflict with or obstruct implementation of the applicable air quality plan (Less than Significant).

The Clean Air Act requires a State Implementation Plan or an air quality control plan to be prepared for areas where air quality violates the National Ambient Air Quality Standards. The Air District's 2017 Clean Air Plan is the current air quality attainment plan for the SFBAAB. The 2017 Clean Air Plan aims to improve air quality, protect public health, and protect the climate, thereby addressing a significant cumulative air quality impact in the air basin.

As discussed under Impact AQ-1, the project would support the goals of the Air District's 2017 Clean Air Plan, would include all applicable control measures, and would not conflict with Clean Air Plan implementation. Because the 2017 Clean Air Plan aims to improve regional air quality in the air basin, the analysis and less-than-significant finding under Impact AQ-1 is inherently cumulative. Therefore, the project's contribution to cumulative impacts would not be considerable. This impact would be ***less than significant***.

Impact C-AQ-2: The project, in combination with past, present, and reasonably foreseeable future projects, would result in a net increase in criteria pollutants for which the project region is classified as a nonattainment area under an applicable federal or state ambient air quality standard, but the project's contribution would be less than cumulatively considerable (Less than Cumulatively Considerable).

As discussed in Chapter 3, Section 3.1.3.4, the Air District's emissions thresholds (Table 3.1-5) represent the average daily emissions that a project may generate, contributing to a cumulative impact on regional air quality. Therefore, exceedances of the Air District's project-level thresholds would be cumulatively considerable for project activities in the SFBAAB. As discussed under Impact AQ-2 in Section 3.1.3.4, project construction and operation would generate regional criteria pollutant emissions in excess of applicable Air District thresholds without mitigation. However, **Mitigation Measures AQ-2-A** through **AQ-2-D** would reduce emissions to levels below the applicable Air District thresholds. As such, the project would not be expected to contribute a significant level of air pollution that would degrade air quality within the SFBAAB. Because the project's construction and operations emissions would not exceed regional thresholds, which are inherently cumulative, the project's criteria pollutant emissions would be ***less than cumulatively considerable***.

Impact C-AQ-3: The project, in combination with past, present, and reasonably foreseeable future projects, would expose sensitive receptors to substantial pollutant concentrations (Less than Significant).

Existing TAC sources and the project's construction and operational emissions could contribute to a cumulative health risk for sensitive receptors near the project site. According to the Air District's CEQA Guidelines, combined risk levels should be determined from all TAC sources within 1,000 feet of a project site, and the total combined risks at sensitive receptors should be compared to applicable cumulative health risk thresholds (BAAQMD 2023).

For stationary sources of TACs, the Air District's inventory of permitted sources and the corresponding health risks were used in the cumulative analysis. For mobile sources, separate datasets provided by the Air District were used. These datasets are the product of health risk modeling that the Air District has conducted and provide health risk contributions from roads and train tracks that are mapped to locations throughout the Bay Area. The methods used to estimate the project's contribution of TAC emissions and health risks are described in Chapter 3, Section 3.1, *Air Quality*. Further detail on the methods used for project- and cumulative-level health risk modeling is included in Appendix 3.1-1, *Air Quality and Greenhouse Gas Technical Appendix*. To evaluate total cumulative health risks, the project-generated health risks were summed with the health risks from existing background sources and compared to the applicable Air District cumulative thresholds. The results of the cumulative impact assessment are summarized in Table 5-2 and include implementation of measures to reduce exhaust and dust emissions during construction, as described in Chapter 3, Section 3.1, *Air Quality*. The table is separated into sections for each type of receptor, offsite and onsite.

Table 5-2. Maximum Cumulative Health Risks

Source	Cancer Risk (per million)	Non-Cancer Chronic Hazard Index	Non-Cancer Acute Hazard Index	Annual PM2.5 Concentration (µg/m3)
Maximally Affected Offsite Receptor Results [a]				
Existing and Future Sources				
Stationary sources	6	0.02	< 0.01	<0.01
Roadway sources	12	0.05	< 0.01	0.36
Rail sources	32	0.01	< 0.01	0.04
Existing and Future Total	**50**	**0.07**	**< 0.01**	**0.40**
Project Sources				
Construction plus Operation	9	0.02	0.01	0.23
Existing plus Project				
Existing plus Project Construction + Operation	60	0.10	0.01	0.63
Significance Threshold	100	10	10	0.8
Exceeds thresholds?	*No*	*No*	*No*	*No*
Maximally Affected Onsite Receptor Results [a]				
Existing Sources				
Stationary sources	10	0.03	< 0.01	< 0.01
Roadway sources	9	0.04	< 0.01	0.26

Source	Cancer Risk (per million)	Non-Cancer Chronic Hazard Index	Non-Cancer Acute Hazard Index	Annual PM2.5 Concentration (µg/m3)
Rail sources	7	< 0.01	< 0.01	0.01
Existing Total	**26**	**0.07**	**< 0.01**	**0.27**
Project Sources				
Construction + Operation	12	0.03	0.01	0.34
Existing plus Project				
Existing plus Project Construction + Operation	38	0.10	0.01	0.61
Significance Threshold	100	10	10	0.8
Exceeds thresholds?	*No*	*No*	*No*	*No*

[a] These results for offsite receptors are representative of multiple offsite receptor locations, because the maximum cancer risk value does not occur at the same receptor location as the maximum PM2.5 concentration value. Thus, no single offsite receptor will be exposed to both the maximum cancer risk and maximum PM2.5 concentration values shown in this table. The same is true for onsite receptors.

PM2.5 = particulate matter with a diameter of 2.5 microns or less; µg/m3 = micrograms per cubic meter

As shown in Table 5-2, the existing stationary, roadway, and railway sources in combination with the project would not exceed any cumulative threshold for cancer risk, hazard index, or annual $PM_{2.5}$ concentrations. The highest values for cancer risk, hazard index, and annual $PM_{2.5}$ concentrations are 60 in 1 million, 0.10, and 0.61 micrograms per cubic meter (µg/m^3) respectively, for the maximally affected receptors. These results are below the Bay Area Air District's cumulative thresholds of 100 in 1 million (cancer risk), 10 (hazard index), and 0.8 µg/m^3 ($PM_{2.5}$).

As noted above, the Southline project is close to the project site, and construction of both could overlap in time. Additionally, the Southline project, like the project, would result in TAC emissions during operations primarily from emergency generators, vehicle traffic, and laboratory fume hoods. No quantitative results can be referenced for the Southline project's construction, because quantitative health risk modeling was only prepared for Phase 1 of that project, which is nearly complete and would not overlap with project construction. Operational-related results from the Southline project were determined to be well below the thresholds with mitigation at the maximally affected receptor (cancer risk of 2.7 per million; PM2.5 concentration of less than 0.1 µg/m^3) (Southline Draft EIR Table 4.2-15). Health risks from construction and operations of subsequent phases of the Southline project were evaluated qualitatively. Nevertheless, although these projects are close to one another, the maximally affected receptors are in different locations, and the contribution from Southline construction and operations is likely to be minimal at the project's maximally affected receptor. The cancer risk, non-cancer index, and PM2.5 concentration values are below the cumulative thresholds by relatively wide margins and are not likely to be exceeded even if quantitative results from the Southline project construction could be added to the totals. Further, the results shown in Table 5-2 are calculated using a series of conservative assumptions, which makes an actual exceedance of the thresholds even less likely.

Although the project would exceed the project-level thresholds pertaining to health risks, as discussed in Chapter 3, Section 3.1, *Air Quality*, there would not be a significant cumulative impact, because none of the cumulative-level thresholds are exceeded. Therefore, this cumulative impact would be ***less than significant***.

Impact C-AQ-4: The project, in combination with past, present, and reasonably foreseeable future projects, would not result in other emissions (such as those leading to odors) that would adversely affect a substantial number of people (Less than Significant).

Odors from project construction and operation would be limited to areas adjacent to their location of use and were found to be less than significant. In addition, other projects in the vicinity would not include odor-generating uses and future project activities would not be anticipated to affect the operation of odor-generating facilities. As a result, the level of odors emitted by the project in combination with the level of odors associated with other nearby projects would not result in a cumulative impact, and this impact would be ***less than significant***.

5.5.3 Biological Resources

The cumulative geographic context for other evaluated biological resources is the immediate vicinity of the project site, which is the area where construction activities, including tree removal, could potentially affect biological resources including nesting migratory birds and protected trees that may be present on or near the site. The cumulative projects in the vicinity of the project site are described in Table 5-1 and shown in Figure 5-1.

Impact C-BIO-1 addresses cumulative impacts with respect to the topics evaluated under Impacts BIO-1 through BIO-6 in Chapter 3, Section 3.2, *Biological Resources*, of this EIR.

Impact C-BIO-1: The project, in combination with past, present, and reasonably foreseeable future projects, would result in a significant cumulative impact on biological resources, but the project's contribution would be less than cumulatively considerable with mitigation (Less than Cumulatively Considerable with Mitigation).

Impact C-BIO-1 is inclusive of Impacts BIO -1, BIO -2, BIO -3, BIO -4, BIO -5 and BIO-6. The project would not modify any undeveloped habitat and would have no impact on sensitive natural communities, including riparian habitat; protected wetlands; the movement of native resident or migratory fish species; or an approved conservation plan. Therefore, the project would not have the potential to contribute to cumulative impacts regarding these topics.

Similar to the project site, the majority of the sites for cumulative projects contain development with ornamental landscaping; therefore, habitat for candidate, sensitive, or special-status species is marginal. The future projects would primarily involve the construction of new buildings on previously developed sites or modifications to existing buildings or infrastructure, and associated tree removals. Therefore, as with the project, such development could have an impact on nesting migratory bird species, the movement of native resident or migratory wildlife species, established native resident or migratory wildlife corridors, the use of native wildlife nursery sites, and local policies or ordinances for protecting biological resources. Cumulative impacts on these biological resources could be significant because reasonably foreseeable projects would affect or remove additional structures and trees and erect new structures. Structures and trees provide roosting and nesting habitat for special-status and migratory birds and act as potential nursery sites; new structures could affect the movement of species. However, these future projects would also be subject to the requirements of the wildlife protection laws, including the California Endangered Species Act, Migratory Bird Treaty Act of 1918, and the California Fish and Game Code, as well as wildlife protection policies and provisions in the general plans and municipal codes for the Cities of San Bruno and South San Francisco.

The project would remove most of the structures and all of the trees that cannot be salvaged, and would plant approximately 475 trees on the project site. The project would construct a transit-oriented, mixed-use development including housing; retail uses; life science laboratory uses; office uses; private and publicly accessible, privately owned open space; and potentially a hotel in the project area. Implementation of **Mitigation Measures BIO-1**, **BIO-4-A**, and **BIO-4-B** require preconstruction surveys for nesting birds, as well as building design measures to minimize lighting effects on birds and bird strike risk. Implementation of these mitigation measures would ensure that the project's contribution to cumulative impacts on nesting bird species, the movement of native resident or migratory wildlife species, established native resident or migratory wildlife corridors, the use of native wildlife nursery sites, and local policies or ordinances for protecting biological resources would be ***less than cumulatively considerable with mitigation***.

5.5.4 Cultural Resources

The cumulative geographic context for the evaluation of historical resources impacts is the State of California (in the context of cumulative impacts on similar resource types) and the immediate project vicinity (in the context of cumulative impacts on the onsite resource). The cumulative geographic context for archaeological resources and human remains is the immediate vicinity of the project site, which is the area where construction activities, including ground-disturbing activities, could encounter archaeological resources and human remains that may be present on or near the site. The cumulative projects within the vicinity of the project site are described in Table 5-1 and shown in Figure 5-1.

Impact C-CUL-1 addresses cumulative impacts with respect to the topics evaluated under Impact CUL-1 in Chapter 3, Section 3.3, *Cultural Resources*, of this EIR. Impact C-CUL-2 addresses cumulative impacts with respect to the topics evaluated under Impact CUL-2 and Impact CUL-3.

Impact C-CUL-1: The project, in combination with past, present, and reasonably foreseeable future projects, would result in a significant cumulative impact on historical resources, but the project's contribution would be less than significant (Less than Significant).

The project site includes one historical resource: California Historical Landmark (CHL) No. 934, Temporary Detention Camps for Japanese Americans-Tanforan Assembly Center in San Mateo County, which is one of multiple sites across 10 California counties included in the designation. All sites included in CHL No. 934 have state- or privately funded plaques or other identifying markers to memorialize the extant or demolished remnants of temporary detention camps for Japanese Americans from the historical resource's period of significance. The Temporary Detention Camps for Japanese Americans-Tanforan Assembly Center in San Mateo County was the only CHL No. 934 site in San Mateo County. The City is not aware of any other projects at other CHL No. 934 sites in California. Therefore, there would be no potential for the project to combine with other projects and cumulatively affect the CHL No. 934 designation.

Table 5-1 identifies cumulative projects in the vicinity of the project site, which largely involve the demolition, alteration, and construction of residential or light industrial buildings. The unique nature of the project site's designation as a former temporary detention camp would not be impacted by the cumulative projects. Moreover, the cumulative projects would not affect the integrity of location and association of the project site in a way that would affect its historic significance or hinder its status as one site within the larger CHL No. 934. There are no other similar historical resources within the geographic vicinity, so the cumulative projects would not impact

other similar resources. For these reasons, cumulative impacts on historical resources would be ***less than significant***.

Impact C-CUL-2: The project, in combination with past, present, and reasonably foreseeable future projects, would result in a significant cumulative impact on archaeological resources, but the project's contribution would be less than cumulatively considerable (Less than Cumulatively Considerable With Mitigation).

The cumulative projects in the vicinity of the project site would be constructed on infill sites in highly disturbed areas. It is likely that the cumulative projects would be constructed on sites where the ground surface has been disturbed or covered with fill and gravel. Similar to the project, the cumulative projects would also be required to undergo environmental review and implement mitigation measures to ensure that project activities would not result in the inadvertent destruction of an archaeological resource and to ensure that discovery procedures pertaining to human remains would be implemented. Nonetheless, cumulative impacts on archaeological resources and human remains are considered potentially significant because the reasonably foreseeable projects would most likely involve ground-disturbing activities that could uncover resources related to resources that could be uncovered by the project.

Implementation of **Mitigation Measures CUL-2-A** and **CUL-2-B**, which reflect requirements for future development on the project site outlined in Mitigation Measures CUL-2.2 and CUL-2.3 in the Housing Element Update IS/MND, would ensure that the project's contribution to cumulative impacts on archaeological resources and human remains would be ***less than cumulatively considerable with mitigation***.

5.5.5 Energy

The cumulative geographic context for energy resources is the service area of Pacific Gas and Electric (PG&E) (i.e., the electric and natural gas service area), which comprises the larger Northern California area and the PCE service area.

Each cumulative impact addresses the topics evaluated in the corresponding project impacts in Chapter 3, Section 3.4, *Energy*, of this EIR. For example, Impact C-EN-1 addresses cumulative impacts with respect to Impact EN-1, Impact C-EN-2 addresses cumulative impacts with respect to Impact EN-2, and so on.

Impact C-EN-1: The project, in combination with past, present, and reasonably foreseeable future projects, would not result in a potentially significant environmental impact due to the wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation (Less than Significant).

Continued growth throughout PCE's and PG&E's service areas could contribute to ongoing increases in demand for electricity and natural gas. These anticipated increases would be countered, in part, by ongoing increases in state and local requirements related to renewable energy increased energy efficiency. The extent to which cumulative development through 2034, the project's buildout year, could result in wasteful, inefficient, or unnecessary consumption of energy resources would depend on the specific characteristics of new development, and are not known at this time. As discussed previously, Senate Bill (SB) 100 obligates utilities to supply 100 percent carbon-free electricity by 2045. PG&E reached California's 2020 renewable energy goal 3 years ahead of schedule and is currently projected to meet the new SB 100 goal, which calls for 100 percent clean energy by 2045.

Similarly, the Pavley standards are expected to lower the demand for fossil fuels by requiring 100 percent of new vehicles sold by 2035 to be zero-emissions vehicles. Therefore, it is anticipated that future energy users will become more efficient and less wasteful over time.

As stated above, buildout of the project would increase operational energy consumption on the project site by 429,870 million BTUs when compared to existing conditions. However, energy use per square foot would decrease from 0.36 million BTUs per square foot under existing conditions to 0.24 million BTUs per square foot under the project despite the threefold increase in building square footage that would occur. This is attributable to the energy efficiency of the future buildings and vehicles, which would be subject to increasingly robust regulations over time to meet the state's renewable energy mandates. The project would incorporate building design features that reduce energy consumption and increase renewable energy generation. Because the project would not result in the wasteful, inefficient, or unnecessary consumption of energy resources, and because cumulative development would be subject to increasingly robust standards regarding energy efficiency, the cumulative impact would be ***less than significant***.

Impact C-EN-2: The project, in combination with past, present, and reasonably foreseeable future projects, would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency (Less than Significant).

Cumulative development through 2034 (project buildout year) would be required to comply with all adopted state and local renewable energy and energy efficiency regulations and plans. Therefore, cumulative impacts would be ***less than significant*** for the project.

5.5.6 Geology, Soils, and Paleontology

In general, a project's potential impacts related to geology and soils are individual and localized, depending on the project site and the underlying soils. Each structure would have different levels of excavation, cut-and-fill work, and grading, which would affect local geologic conditions in different ways. Therefore, the geographic context for cumulative impacts on geology and soils is site-specific. The geographic context for paleontological resources is the full extent of geologic units with high or unknown paleontological sensitivity that underlie the construction area.

Impact C-GEO-1 addresses cumulative impacts with respect to the topics evaluated under Impacts GEO-1 through GEO-5 in Chapter 3, Section 3.5, *Geology, Soils, and Paleontology*, of this EIR. Impact C-GEO-2 addresses cumulative impacts with respect to the topics evaluated under Impacts GEO-6 in Section 3.5, *Geology, Soils, and Paleontology*, of this EIR.

Impact C-GEO-1: The project, in combination with past, present, and reasonably foreseeable future projects, would not result in a significant cumulative impact on geology and soils (Less than Significant).

Impact C-GEO-1 is inclusive of Impacts GEO-1, GEO-2, GEO-3, GEO-4, and GEO-5. Past, present, and reasonably foreseeable future projects are described in Table 5-1 and shown in Figure 5-1. The cumulative projects could require various levels of excavation or cut-and-fill, which would affect local geologic conditions. However, the cumulative projects would be required to go through environmental and regulatory review and comply with local and state building codes. In addition, each project would also be required to have a site-specific geotechnical investigation performed, which would provide design recommendations to reduce each project's impacts related to geologic and seismic safety. Similar to the project, mandatory seismic safety standards, design review and

conditions of approval would apply to the reasonably foreseeable future projects. For these reasons, the project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a cumulative geology and soils impact. The cumulative impact would be ***less than significant***.

Impact C-GEO-2: The project, in combination with past, present, and reasonably foreseeable future projects, would result in a significant cumulative impact on paleontological resources, but the project's contribution would be less than cumulatively considerable (Less than Cumulatively Considerable with Mitigation).

The cumulative projects in the geographic context for paleontological resources would be constructed on infill sites in highly disturbed areas. It is likely that the cumulative projects would be constructed on sites where the ground surface has been disturbed or covered with fill and gravel. However, deep excavation could reach areas of undisturbed native sediments that could contain significant paleontological resources. Reasonably foreseeable projects planned or proposed for construction on these sensitive geologic units could encounter paleontological resources. Therefore, the cumulative impact could be significant because the reasonably foreseeable projects would likely involve ground-disturbing activities that could uncover resources related to resources that could be uncovered by the project. However, implementation of **Mitigation Measure GEO-6** would ensure that the project's contribution to cumulative impacts on paleontological resources would be ***less than cumulatively considerable with mitigation***, because it would provide construction personnel training, provide procedures for resources encountered during construction, and ensure that information that may be recoverable from any identified paleontological resource would be recorded and properly curated.

5.5.7 Greenhouse Gases

Climate change is a global problem, and GHG impacts are inherently cumulative. This is because GHGs contribute to the global phenomenon that is climate change, regardless of where they are emitted. Climate change is the result of the individual contributions of countless past, present, and future sources. Therefore, GHG impacts are inherently cumulative, and the analysis provided in Chapter 3, Section 3.6, *Greenhouse Gases*, is inclusive of cumulative impacts. As discussed therein, the impact would be ***less than significant***.

5.5.8 Hazards and Hazardous Materials

The cumulative geographic context for hazards and hazardous materials consists of sites within the project footprint and nearby properties within the vicinity of the project footprint. In general, only projects occurring in the immediate vicinity to the project site are considered due to the limited potential impact area associated with the release of hazardous materials into the environment. The cumulative projects located within approximately 0.5 mile of the project site are described in Table 5-1 and shown in Figure 5-1. Note that Impact HAZ-5 is not discussed in the section as other projects would not contribute to this impact. Impacts related to noise are discussed in detail in the *Noise* section below.

Impact C-HAZ-1 addresses cumulative impacts with respect to the topics evaluated under Impacts HAZ-1 through HAZ-7 in Chapter 3, Section 3.7, *Hazards and Hazardous Materials*, of this EIR.

Impact C-HAZ-1: The project, in combination with past, present, and reasonably foreseeable future projects, would not result in a significant cumulative impact on hazards or hazardous materials (Less than Significant).

Impact C-HAZ-1 is inclusive of Impacts HAZ-1, HAZ -2, HAZ -3, HAZ -4, HAZ -5, HAZ -6, and HAZ -7. Similar to the project, reasonably foreseeable projects could result in construction impacts related to the routine transport, disposal, or handling of hazardous materials; intermittent use and transport of petroleum-based lubricants, solvents, and fuels; and transport of affected soil to and from sites. However, hazardous waste generated during construction of any project would be collected, properly characterized for disposal, and transported in compliance with federal, state, and local regulations, as described under Chapter 3, Section 3.7.2.1, *Regulatory Setting*. Hazardous materials are strictly regulated by local, state, and federal laws. Specifically, these laws are designed to ensure that hazardous materials do not result in a gradual increase in toxins in the environment. For each of the reasonably foreseeable projects under consideration, various project-specific measures, such as the ones identified for the project, would be implemented as a condition of development approval to mitigate risks associated with an exposure to hazardous materials.

Similar to the project, the Southline project in South San Francisco would include R&D uses with the potential to handle hazardous materials, including biomedical materials and waste. Like the project, the Southline project would comply with the safety procedures mandated by applicable federal, state, and local laws and regulations (e.g., the Resources Conservation and Recovery Act, California Hazardous Waste Control Law, Title 8 of the California Code of Regulations) to ensure that risks resulting from the routine use of hazardous materials and disposal of hazardous wastes remain less than significant. In accordance with standard industry practice, R&D laboratories would also meet relevant Biosafety in Microbiological and Biomedical Laboratories and National Institute of Health guidelines applicable to the BSL, ensuring safe operating conditions and minimizing any risk of upset. A small corner of the Southline project site is located in Safety Zone 4 of the SFO ALUCP; however, no development is proposed in this small area. Other projects located in Safety Zone 4 include Project Nos. 2, 14, 16, and 19. These include rail, pedestrian, and bicycle transportation projects, minor land use changes, and architectural review permits. None of these projects would combine with the project to introduce hazardous uses within the safety zone. Regarding compatibility with the ALUCP's noise contours (Section 5.5.11, *Noise*). Overall, the probability of an accident related to the transport of hazardous materials for development projects is low because of the stringent regulations that apply to the transport, use, and storage of hazardous materials.

The project in combination with other development in the immediate vicinity would add to cumulative traffic congestion on roadways used for evacuation. However, the project site and immediate vicinity are well serviced by an extensive vehicular circulation network, allowing for multiple possible evacuation routes in case of an emergency. Although any growth involving an increased use of hazardous materials would have the potential to increase the demand for emergency response services, a revised internal roadway configuration that would enhance emergency vehicle (along with other modes of transportation) access to the project site is included in the project's features, thus allowing for a more effective emergency response.

Substantive hazardous materials accidents within the project site or in the vicinity are expected to be rare. In addition, if such incidents were to occur, only one such incident would be expected at any one time (except during major catastrophes). For these reasons, the project in combination with other past, present, and reasonably foreseeable future projects in the immediate vicinity of the project site would not result in a significant cumulative impact associated with hazards or hazardous materials. The cumulative impact would be ***less than significant***.

5.5.9 Hydrology and Water Quality

The cumulative geographic context for impacts related to surface water hydrology and water quality is the Colma Creek-Frontal San Francisco Bay Estuaries Watershed (approximately 32 square miles). The cumulative geographic context for impacts related to groundwater hydrology and water quality is the Westside Groundwater Basin (approximately 40 square miles). Given the size of each area, it is beyond the scope of this EIR to identify every cumulative project within their boundaries. However, it is reasonable to assume that other cumulative projects would be similar to the past, present, and reasonably foreseeable future projects identified within a 0.5-mile radius of the project site (refer to Table 5-1 and Figure 5-1) in that they would be anticipated to consist predominantly of urban development on similar paved, infill sites. Note that Impact HWQ-4 is not discussed in the section. As discussed in Chapter 3, Section 3.8, *Hydrology and Water Quality*, the project site is not within a planned tsunami inundation area, nor prone to inundation by seiche, and is not within the 100-year floodplain area in the City of San Bruno. Therefore, the project would have no contribution to any cumulative impact related to Impact HWQ-4.

Each cumulative impact addresses the topics evaluated in the corresponding project impacts in Chapter 3, Section 3.8, *Hydrology and Water Quality*, of this EIR. For example, Impact C-HWQ-1 addresses cumulative impacts with respect to Impact HWQ-1, Impact C- HWQ -2 addresses cumulative impacts with respect to Impact HWQ -2, and so on.

Impact C-HWQ-1: The project, in combination with past, present, and reasonably foreseeable future projects, would result in a significant cumulative impact on hydrology and water quality, but the project's contribution would be less than cumulatively considerable (Less than Cumulatively Considerable with Mitigation).

Development of the project, combined with other past and future development or redevelopment within the potentially affected geographic area, could degrade stormwater quality through changes in impervious surface area and an increase in contaminated runoff. This could ultimately violate water quality standards, affect beneficial uses, or further impair 303(d)-listed waters within the watershed. The quality of stormwater runoff varies with surrounding land uses, topography, and the amount of impervious cover as well as the intensity (energy) and frequency of irrigation or rainfall.

Stormwater drainage can result in cumulative effects on water quality within the affected basin. Development within the vicinity of the project could degrade stormwater quality during construction through land disturbance and during operation through an increase in impervious surface area and contaminated runoff. During construction, runoff may contain sediments and other construction materials and wastes (e.g., concrete debris), resulting from activities such as site clearing, demolition and the removal of the existing structure and pavement, grading and excavation, paving, and landscaping. During operation, runoff may contain oil, grease, and metals that accumulated in streets and parking lots as well as pesticides, nutrients, animal waste, and trash from landscaped areas.

When the effects of the project on water quality are considered in combination with the overall project and potential effects of other cumulative projects, there would be the potential for cumulative impacts on surface and groundwater quality. The geographic area is fully developed. Buildout of cumulative projects would involve redevelopment of existing developed sites that contain substantial impervious surfaces. The incremental water quality impact contribution from implementation of the project would be minor. The combined effects on water quality from the project and other projects could result in a cumulatively significant impact. However, these cumulative projects would be required to comply with the San Francisco Bay Municipal Regional Permit, San Mateo Countywide Water Pollution Prevention Plan requirements, the Construction General Permit, and city municipal codes as they relate to water quality and stormwater discharge. These regulatory requirements have been designed to protect water quality. Additionally, development projects would be subject to an environmental review process, which would identify potential site or project-specific water quality impacts and mitigate for any potential significant impacts.

Before mitigation, the project could contribute to cumulative significant water quality impacts relative to construction dewatering as described for Impact HWQ-1. However, with implementation of **Mitigation Measure HWQ-1**, water quality effects due to construction dewatering would be controlled such that the project would not contribute considerably to cumulative significant water quality impacts. Therefore, cumulative impacts on hydrology and water quality as a result of the project would be ***less than cumulatively considerable with mitigation***.

Impact C-HWQ-2: The project, in combination with past, present, and reasonably foreseeable future projects, would not result in a significant cumulative impact on groundwater supply and recharge (Less than Significant).

During construction of other reasonably foreseeable development projects within the Westside Groundwater Basin, potential dewatering could be conducted on a one-time or temporary basis during the construction phase but would not result in a loss of water that would deplete groundwater supplies. During operation, new impervious areas can reduce the potential for groundwater recharge. However, most other reasonably foreseeable projects in the basin would be redevelopment or infill projects in highly urbanized areas where there is limited existing recharge through infiltration due to impervious area. Development in highly urbanized areas would not be expected to increase the amount of impervious surfaces substantially because this development would be occurring mostly in areas with a substantial amount of existing impervious surfaces. Therefore, groundwater recharge from percolating rainfall would not be adversely affected, and an indirect lowering of the local groundwater table is not likely to occur. The project would not interfere with groundwater recharge because it would not decrease the size of groundwater recharge areas, and would increase the amount of pervious surface on the project site. The San Francisco Bay Municipal Regional Permit encourages a variety of green infrastructure, Low-Impact Development (LID), and open space which would allow water to infiltrate. Cumulative development would also follow the City's adopted Green Infrastructure Plan. Therefore, groundwater recharge would not be adversely affected and cumulative groundwater recharge impacts would be less than significant.

Cumulative development could require increases in water supplies. During construction, the project may require temporary dewatering. Measures would be implemented to reduce impacts related to dewatering and groundwater resources. The City of San Bruno, including the project site and other cumulative development, are serviced by both the San Francisco Public Utilities Commission

(SFPUC) and local South Westside Basin groundwater resources. Purchase of water would be based on system needs, water availability, and regional groundwater recharge goals. The project would be subject to the same water conservation and water use restrictions as other City water customers. Landscape areas would continue to allow for groundwater infiltration and bioretention areas would also manage runoff. Therefore, cumulative impacts related to groundwater supply would be ***less than significant***.

Impact C-HWQ-3: The project, in combination with past, present, and reasonably foreseeable future projects, would result in a significant cumulative impact on drainage patterns, but the project's contribution would be less than cumulatively considerable (Less than Cumulatively Considerable with Mitigation).

Cumulative development within the vicinity of the project could increase the volume and rate of stormwater runoff. Such increases could cause localized flooding if the storm drainage capacity is exceeded or convey excess flows to overbank areas where flood storage may not be available. Generally, cumulative projects would occur in developed areas with existing impervious surfaces, and would not be expected to substantially increase the amount of new impervious surfaces.

All new development is required to handle stormwater in a manner that ensures that flooding will not increase and flood flows will not be redirected to other areas that are not currently prone to flooding. All cumulative projects would be required to include stormwater management features, such as LID measures into project designs to reduce flows to pre-project conditions. If improvements to storm drainage capacity are needed, the City would ensure the appropriate storm drainage improvements are identified.

The project would result in a decrease in impervious surfaces. Further, post-project flow rates and volumes would be less than pre-project conditions. Post-construction stormwater management BMPs include implementation of rainwater harvesting, infiltration, and bioretention areas, allowing stormwater infiltration and reducing impacts associated with impervious areas. All new development would be required to address stormwater in a manner that ensures that flooding will not increase and flood flows will not be redirected to other areas that are not currently prone to flooding. All cumulative projects would be required to include stormwater management features, such as LID measures into project designs to reduce flows to pre-project conditions. If improvements to storm drainage capacity are needed, the City would ensure the appropriate storm drainage improvements are identified.

The evaluation of storm drain capacity in Chapter 3, Section 3.8, *Hydrology and Water Quality*, Impact HWQ-3, accounts for projected buildout under the City's Storm Drain Master Plan. Therefore, the analysis is inherently cumulative. As discussed, while most areas would experience a decrease in peak flows under the project, the storm drain mains on Sneath Lane are predicted to experience an increase in peak flow. Although the area has not previously experienced drainage capacity concerns and the additional flow is not expected to cause substantial flooding issues, the increase in stormwater peak flows and total volume is notable. Cumulative projects in the vicinity would contribute to the increased flows, resulting in a significant cumulative impact. **Mitigation Measure HWQ-3** requires the project to prepare a site-specific survey to demonstrate that the existing system in Sneath Avenue can adequately accommodate the additional stormwater flow rates and volumes. Implementation of the mitigation measure would ensure that the project's contribution to the cumulative impact is ***less than cumulatively considerable with mitigation***.

5.5.10 Land Use

The cumulative land use analysis examines the effects of the project in the relevant geographic area in combination with those of other current projects, probable future projects, and projected future growth. A list of cumulative projects is described in Table 5-1 and shown in Figure 5-1.

Each cumulative impact addresses the topics evaluated in the corresponding project impacts in Chapter 3, Section 3.9, *Land Use*, of this EIR. For example, Impact C-LU-1 addresses cumulative impacts with respect to Impact LU-1, Impact C- LU -2 addresses cumulative impacts with respect to Impact LU -2, and so on.

Impact C-LU-1: The project, in combination with past, present, and reasonably foreseeable future projects, would not physically divide an established community (Less than Significant).

As discussed above, the physical division of an established community typically refers to the construction of a linear feature, such as an interstate highway or railroad tracks, or removal of a means of access, such as a local bridge, that would affect mobility within an existing community or between and outlying area.

The project, together with cumulative projects identified in Table 5-1 would not introduce any physical features that could divide established communities, nor would it remove a means of access among established communities. Therefore, cumulative impacts related to the division of an established community are ***less than significant***.

Impact C-LU-2: The project, in combination with past, present, and reasonably foreseeable future projects, would result in an environmental impact due to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, but the project's contribution would be less than cumulatively considerable (Less than Cumulatively Considerable).

As discussed under Chapter 3, Section 3.9.3.2, *Methodology and Approach*, CEQA requires an EIR to consider whether a project may conflict with any applicable land use plan, policy, or regulation that was adopted for the purpose of avoiding or mitigating an environmental impact. This environmental determination differs from a determination of whether a project is consistent with a jurisdiction's general plan. Even if inconsistent, the policy inconsistency may not relate to an environmental impact. With respect to consistency with regional plans (Plan Bay Area 2050), cumulative impacts from development would occur if the growth associated with a particular project, in combination with other projects in the jurisdiction, was not accounted for in a given jurisdiction's planning documents. The plans of the Bay Area's jurisdictions are one of the bases for regional growth projections by ABAG, and regional growth projections are the foundation for regional plans. As discussed in Section 3.11, *Population and Housing*, Plan Bay Area 2050 calls for an increasing percentage of Bay Area growth to occur as infill development in areas with good transit access and the services necessary to accommodate daily living in proximity to housing and jobs.

Section 5.5.12, *Population and Housing*, includes a cumulative environmental impact assessment regarding the project's consistency with ABAG's population projections. The section concludes that the project alone would not exceed ABAG's growth forecasts for the City of San Bruno. However, cumulative projects and background growth would exceed the growth forecasts for both population and housing for the City. This would result in a significant cumulative impact. However, as an urban infill development project near transit, the project's contribution to cumulative impacts related to

inconsistency with regional planning initiatives would be ***less than cumulatively considerable***. Refer to Section 5.5.12, *Population and Housing*, for further discussion.

The project is subject to and consistent with applicable policies included in the *San Bruno General Plan* (City of San Bruno 2009) intended to mitigate environmental effects. Other future projects in San Bruno would be evaluated for consistency with applicable general plan policies and are anticipated to be consistent with land use plans and policies in effect at the time of approval. Therefore, the proposed project, in combination with reasonably foreseeable future development, would not result in a significant impact related to conflicts with the *San Bruno General Plan* and cumulative impacts related to conflicts with the general plan would be ***less than significant***.

In addition, the project would be subject to the SFO ALUCP and required to comply with relevant ALUCP policies regarding safety, height, and noise. The project would be consistent with the ALUCP's safety compatibility policies as discussed in Chapter 3, Section 3.9, *Land Use*. In addition, the project would be compliant with Federal Aviation Administration and ALUCP regulations regarding building height limits with implementation of **Mitigation Measure HAZ-5**. Future projects that fall within the SFO's critical aeronautical surfaces map as outlined in the ALUCP would be subject to height limitations, and would be required to consult with the FAA and C/CAG under CFR 77.9 and receive subsequent determination of no hazard in order for the project to be implemented. As such, the project, and future projects, would be compliant with FAA and ALUCP regulations regarding building height limits. Furthermore, there are no cumulative projects in the vicinity of the project site that would include new residential land uses within the 70 dBA noise contour. As such, no projects would combine with the project to introduce new residential land uses within the 70 dBA noise contour, and conflict with ALUCP noise compatibility policies. Therefore, the project, in combination with reasonably foreseeable future development, would not result in a significant impact related to conflicts with the ALUCP. Cumulative impacts related to conflicts with the ALUCP would be ***less than significant***.

5.5.11 Noise

The cumulative geographic context for noise and vibration varies, depending on the source of the noise or vibration. Specifically, the geographic context for cumulative construction noise impacts typically encompasses cumulative projects within 1,000 feet of the project site. Beyond 1,000 feet, the contributions of noise from the construction of other projects would be greatly attenuated through both distance and intervening structures, and their contribution would be expected to be minimal. The cumulative context for stationary-source noise impacts, such as noise effects from heating and cooling or other mechanical equipment, as well as vibration effects from construction activities is generally smaller than this distance (a few hundred feet, at most). Finally, cumulative impacts related to vehicular traffic noise are based on the overall forecast average daily traffic along roadway segments near the project site, which includes traffic increases from all growth in the project area, as predicted in the traffic model. The cumulative projects in the vicinity of the project site are described in Table 5-1 and shown in Figure 5-1.

Each cumulative impact addresses the topics evaluated in the corresponding project impacts in Chapter 3, Section 3.10, *Noise*, of this EIR. For example, Impact C-NOI-1 addresses cumulative impacts with respect to Impact NOI-1, Impact C- NOI -2 addresses cumulative impacts with respect to Impact NOI -2, and so on.

Impact C-NOI-1: The project, in combination with past, present, and reasonably foreseeable future projects, would result in the 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 (Significant and Unavoidable).

5.5.11.1 Construction Noise

Construction noise is a localized impact that reduces as distance from the noise source increases. In addition, intervening features (e.g., buildings) between construction areas and nearby noise-sensitive land uses result in additional noise attenuation by providing barriers that break the line of sight between noise-generating equipment and sensitive receptors. These barriers can block sound wave propagation and somewhat reduce noise at a given receiver. The cumulative setting for construction noise impacts is considered to be approximately 1,000 feet from the project site, since projects located within this distance could expose receptors between, or equidistant from, the two projects to greater overall noise levels, depending on the intervening distances.

The following cumulative projects are within approximately 1,000 feet of the project site.

- **Project No. 28 – The Crossings.** Auto Dealerships, and automotive dealership and service center at 1010 Admiral Court in San Bruno, California. Located approximately 200 feet west of the project site.
- **Project No. 16 – Huntington Avenue Bicycle and Pedestrian Improvements.** A separated bicycle track and pedestrian improvements on Huntington Avenue. Located approximately 300 feet or more south of the project site.
- **Project No. 27 – Southline.** A project including 2.8 million square feet of Class-A office and life science space on 31 acres purpose-built science and technology development. Located approximately 350 northeast of the main project site, and 150 feet east of the northern project parcel.
- **Project No. 32 – Wong Residence.** A lot split to accommodate new dwelling unit via SB 9 at 997 Mason Avenue in San Bruno. Located approximately 450 feet south of the project site.
- **Project No. 8 – 990 El Camino Real.** A four-story residential building with parking on the ground floor. Located approximately over 700 feet from the project site.
- **Project No. 2 – 1065 San Mateo Avenue.** A project involving a land use change from trucking company to auto body and repair. Located approximately 750 feet from the project site.
- **Project No. 1 – 1000 San Mateo Avenue.** A new warehouse and distribution facility for Amazon Logistics. Located approximately 1,000 feet from the project site.

As described under Impact NOI-1, project construction would occur mostly during the standard daytime hours for construction as defined by the San Bruno Municipal Code. During these daytime hours, construction noise from the project would be expected to comply with the allowable noise limit of 85 dBA at 100 feet; construction noise impacts during daytime hours would be ***less than significant***. Construction for cumulative projects would also likely occur primarily during daytime hours. During these hours, construction noise restrictions are less stringent, and nearby receptors are considered less sensitive to noise. For this reason, cumulative construction noise impacts during daytime hours would be ***less than significant***.

Note that some nighttime construction in the form of concrete pours (up to 100 instances total over the construction duration) are proposed for the project. Concrete pours often must occur during nighttime hours because cooler temperatures and higher humidity levels provide better conditions for concrete curing. In addition, many of the instances of "nighttime construction" for the project would actually be early morning construction, beginning at 5:00 a.m.; non-daytime construction would generally not occur throughout the entire duration of a single night. However, because nighttime construction activities would occur for the project, and because quantitative noise limits (60 dBA L_{eq} at 100 feet) are estimated to be exceeded during such activities, the project impact related to non-daytime construction would be significant.

It is also possible that future cumulative projects may propose or require construction activities outside standard daytime hours. Of note, according to the Final EIR prepared for the Southline project (State Clearinghouse No. 2020050452), nighttime concrete pours are anticipated as part of that project. While Phase 1 of the Southline project is nearly complete at the time of this EIR analysis, construction of future phases could overlap with construction of the project. Should non-daytime construction of nearby cumulative projects occur concurrently with the project on the same nights, residential receptors located near to, or in between, multiple construction sites could be exposed to construction noise during non-exempt hours from both the project and a cumulative project. Note that, at greater distances, cumulative construction noise would be less likely to combine to result in greater impacts. However, because some cumulative projects are located near the project site and near the same residential receptors, it is possible that some sensitive uses may experience greater non-daytime construction noise levels than would occur from a single project.

Although specific details about construction schedules for all cumulative projects are not known with certainty at this time, should construction for cumulative projects located near the project site and offsite receptors occur concurrently with project construction, and should construction for cumulative projects and the project occur during non-daytime hours on the same night, construction noise from multiple projects could combine to expose the same receptors (e.g., residential land uses) to even greater cumulative construction noise levels. For these reasons, cumulative construction noise impacts would be considered significant.

As discussed in the project analysis and shown in Chapter 3, Table 3.10-14, because project construction could occur outside daytime hours, resulting in noise levels of up to approximately 73 dBA L_{eq} at nearby residences (e.g., from operation of a concrete mixer and concrete pumps) and 79 dBA at 100 feet (as compared to the 60 dBA at 100 feet threshold), project impacts would be significant. Because the project may result in noise levels in excess of thresholds during non-daytime hours, and because the potential to overlap with the Southline project in particular, the project's contribution to the cumulative construction noise impact during non-daytime hours would be considered cumulatively considerable.

Implementation of **Mitigation Measure NOI-1-A**, which includes the development of a Construction Noise Control Plan to for non-daytime hours, and **Mitigation Measure NOI-1-B**, which requires the construction of a temporary noise barrier prior to nighttime construction activities within approximately 500 feet of residential uses, would be implemented to reduce the project's construction noise impact, and the project's contribution to cumulative noise levels. However, as described in Section 3.10, *Noise and Vibration*, it may not be possible to reduce noise levels during all non-daytime construction activities to less-than-significant levels. Therefore, the cumulative construction noise impact would be ***significant and unavoidable***, and the project's contribution to that impact would be ***cumulatively considerable with mitigation***.

5.5.11.2 Operational Noise

Traffic

Potential cumulative traffic noise impacts along nearby roadway segments resulting from project development were quantitatively modeled using traffic volumes, existing vehicle-mix assumptions (i.e., the proportion of automobiles, trucks, buses, and other vehicles), and speed limits provided by the project traffic engineer (Fehr & Peers). Provided daily turn movements were converted into average daily traffic volumes. A quantitative assessment of cumulative traffic noise impacts was conducted using a spreadsheet that was based on the Federal Highway Administration Traffic Noise Model, version 2.5. The spreadsheet calculates the traffic noise level at a fixed distance from the centerline of a roadway (50 feet) according to the traffic volume, roadway speed, and vehicle mix predicted to occur under each condition. The evaluation of potential cumulative traffic noise impacts on nearby noise-sensitive land uses compared traffic noise modeling for the Baseline condition to the Cumulative (2040) plus Project condition.

A cumulative impact related to traffic noise would be identified by one of the following.

- If a traffic noise increase of 3 dBA or more occurs between Baseline and Cumulative plus Project conditions, where resulting traffic noise levels would be above the normally acceptable range at a noise-sensitive land use.
- If a traffic noise increase of 5 dBA or more occurs between Baseline and Cumulative plus Project conditions, where resulting traffic noise levels would remain within the normally acceptable range at a noise-sensitive land use.

If cumulative traffic noise impacts were modeled to occur, the project contribution to these impacts was assessed by comparing traffic noise from the Cumulative No Project scenario to the Cumulative plus Project scenario. The project would have a cumulatively considerable contribution to a cumulative traffic noise impact if the project's contribution to the cumulative impact (i.e., the delta between Cumulative No Project and Cumulative plus Project conditions) is 1 dB or greater.

Table 5-3 shows the cumulative traffic noise modeling results, and includes an analysis of potential impacts along roadway segments near the project site. As shown in this table, there were no segments identified where the applicable 3 or 5 dBA increase in noise would occur from Baseline to Cumulative with Project conditions. Therefore, cumulative traffic noise impacts would be ***less than significant***.

Heating, Cooling, and Ventilation Equipment

In general, most operational sources of noise do not generate noise that is perceptible far beyond the edge of a project site. Although noise from project heating and cooling equipment would be localized and would attenuate rapidly with distance, it is possible that project heating and cooling equipment could generate noise in excess of allowable levels, depending on the type of equipment installed and the location of the equipment. It is also possible that noise-generating uses from nearby projects could be close enough to one another that heating and cooling noise from multiple projects could combine and result in a cumulative noise impact. For example, the Crossings – Auto Dealerships, is located approximately 200 feet west of the southwest portion of the project site, and just over 100 feet south of the Avalon Apartments in San Bruno. These apartments are also located within approximately 350 feet of project buildings. Therefore, these residential uses could in theory be exposed to operational equipment noise from both the project site and a cumulative project,

depending on the noise levels of the equipment installed at the two projects. Although complete details about heating and cooling equipment for the project and for nearby development projects (including the Crossings – Auto Dealerships) are not known at this time, it is possible that noise from heating and cooling for the project could combine with heating and cooling noise from nearby projects to cause a cumulative noise impact at nearby residential land uses. This cumulative impact is considered potentially significant.

With implementation of project **Mitigation Measure NOI-1c**, project-related impacts would be reduced to less-than-significant levels. Therefore, the project contribution to the potential cumulative impact related to heating, cooling and ventilation equipment noise would be ***less than cumulatively considerable with mitigation***.

Table 5-3. Modeled Cumulative Traffic Noise Levels

Roadway	Segment Location	Most Sensitive Adjacent Land Use	Modeled Baseline Conditions (dBA L_{dn})	Modeled Cumulative Plus Project Conditions (dBA L_{dn})	Applicable Compatibility Standard (dBA L_{dn})[a]	Allowable Noise Increase[b]	Change (dB)	Exceeds Allowable Increase?
El Camino Real	North of EB I-380 Ramps	MFR	70.2	71.5	65	3	1.3	No
El Camino Real	North of Tanforan Way	C/O/I	70.3	71.4	70	3	1.1	No
El Camino Real	North of WB I-380 Ramps	MFR	71.0	72.3	65	3	1.3	No
El Camino Real	South of Sneath Lane	C/O/I	70.3	71.4	70	3	1.1	No
El Camino Real	South of Tanforan Way	MFR	71.0	72.3	65	3	1.3	No
El Camino Real	South of WB I-380 Ramps	MFR	70.2	71.5	65	3	1.3	No
Huntington Avenue	East of Huntington Avenue/San Bruno BART	SFR, MFR	68.3	69.8	65	3	1.5	No
Huntington Avenue	North of Forest Lane	SFR, MFR	66.2	67.8	65	3	1.7	No
Huntington Avenue	North of San Bruno Avenue	SFR, MFR	65.7	67.4	65	3	1.7	No
Huntington Avenue	North of San Bruno BART	SFR, MFR	68.5	71.0	65	3	2.5	No
Huntington Avenue	North of Tanforan Parking Structure	SFR, MFR	65.9	67.8	65	3	1.9	No
Huntington Avenue	South of Forest Lane	SFR, MFR	65.8	67.4	65	3	1.7	No
Huntington Avenue	South of San Bruno BART	SFR, MFR	66.8	68.8	65	3	2.0	No
Huntington Avenue	South of Tanforan Parking Structure	SFR, MFR	65.9	67.6	65	3	1.8	No
San Bruno Avenue	East of Huntington Avenue	SFR, MFR	64.5	65.8	65	3	1.4	No
San Bruno Avenue	West of San Mateo Avenue	SFR, MFR	64.5	65.8	65	3	1.4	No
Sneath Lane	East of Cherry Avenue	C/O/I	68.8	70.9	70	3	2.1	No
Sneath Lane	East of El Camino Real	C/O/I	67.1	69.6	70	5	2.5	No
Sneath Lane	East of Marshalls/Cinemark Driveway	C/O/I	66.9	69.2	70	5	2.3	No
Sneath Lane	East of National Avenue	C/O/I	68.8	71.1	70	3	2.3	No
Sneath Lane	East of NB I-280 Ramps/Cemetery Driveway	MFR	65.5	67.3	65	3	1.9	No
Sneath Lane	East of Sea Biscuit Avenue	C/O/I	67.0	69.6	70	5	2.7	No
Sneath Lane	West of Cherry Avenue	MFR	68.5	70.4	65	3	1.9	No
Sneath Lane	West of El Camino Real	C/O/I	68.8	71.1	70	3	2.3	No
Sneath Lane	West of Huntington Avenue/San Bruno BART	C/O/I	66.8	69.2	70	5	2.4	No
Sneath Lane	West of Marshalls/Cinemark Driveway	C/O/I	67.0	69.9	70	5	3.0	No
Sneath Lane	West of National Avenue	C/O/I	68.9	71.0	70	3	2.1	No
Sneath Lane	West of Rollingwood Drive	SFR, MFR	65.3	66.3	65	3	1.0	No
Sneath Lane	West of Sea Biscuit Avenue	C/O/I	66.6	69.0	70	5	2.5	No

Refer to Appendix A for the complete traffic noise modeling results. Note: Modeled noise levels at a fixed distance of 50 feet from the roadway centerline.

[a] Applicable land use compatibility standards in San Bruno include 65 dBA L_{dn} or less for residences and childcare, and 70 dBA L_{dn} or less for offices and retail.

[b] A cumulative traffic noise impact is anticipated along a given roadway segment if a 3 dB increase in noise would occur in areas where baseline and resulting noise levels are above the applicable land use compatibility standard or if a 5 dB increase in noise would occur in areas where baseline and resulting noise levels are below the applicable land use compatibility standard.

EB = eastbound; WB = westbound; NB = northbound; MFR = Multifamily Residential; C/O/I = Commercial/Office/Industrial; SFR = Single-Family Residence

Emergency Generator Testing

Emergency generators included in the development of the project would result in the generation of audible noise during testing. With regard to the potential for cumulative impacts, the nearest cumulative projects (with stationary mechanical equipment) to the project site are Southline, located 350 feet or more northeast of the main project site and 150 feet east of the northern project parcel, the Crossings – Auto Dealerships, located 200 feet east of the project site. Should nearby projects also install emergency generators and should generator testing occur simultaneously for a nearby project and the project, a potential cumulative impact could occur.

Emergency generators are tested intermittently (often on the order of once per month for 30 to 60 minutes), and their use is often exempted during actual emergencies. Although specific details regarding the emergency generators proposed for nearby future projects are not known at this time, project generators would be tested approximately once per month for 30 minutes at a time and once per year for 60 minutes at a time, during daytime hours. In general, it is unlikely that the very short-term testing of an emergency generator for the project would occur concurrently with the testing of a generator at a nearby project. Even if testing were to occur simultaneously, which is unlikely, it is not likely that the generators would be close enough to one another for the noise to combine at a given individual receptor. For these reasons, cumulative noise impacts related to emergency generator testing would be ***less than significant***.

Loading Dock Activity

In general, the loading and unloading of goods is a common occurrence in cities and urban environments. The project site is in an urban environment near a freeway (I-380) and major thoroughfares (e.g., El Camino Real). Measured existing noise levels at the project site and at nearby sensitive uses were in the range of 71 to 76 dBA L_{dn}. Loading docks associated with the project would be located internal to buildings or parking garages. As a result, project loading dock noise is not anticipated to generate substantial noise external to the project buildings. In addition, according to the project traffic engineer, usage at each loading dock would be fairly minor because the project land uses are not substantial truck generators (e.g., distribution centers). Commercial loading would typically occur during daytime hours, with the nearest loading dock under Scenario B located at least 300 feet (and usually much more) from the nearest offsite noise-sensitive receptors; the nearest loading dock under Scenario A would be even further from sensitive uses.

The nearest cumulative projects to the project site that would be expected to have loading docks are Southline, located 350 feet or more northeast of the main project site and 150 feet east of the northern project parcel, and the Crossings – Auto Dealerships, located 200 feet east of the project site. At these distances, and considering all project loading docks would be internal to buildings (substantially reducing audible noise at nearby sensitive uses), loading activity noise from the project would not be expected to combine with loading noise from cumulative projects to result in a significant cumulative noise impact. Cumulative noise impacts related to loading dock activity would be ***less than significant***.

Parking Activity

Based on the distances to nearby cumulative projects and the types of development proposed under those cumulative projects, project parking structures are not expected to be located near enough to parking areas for cumulative projects to result in a cumulative impact related to parking activity. In addition, estimated noise at nearby sensitive uses from project parking structures was in the range of 38 dBA L_{eq} (from the Parking/Field House 1 structure) to 44 dBA L_{eq} (at the Flex Zone II parking structure) based on the project noise modeling. These noise levels are over 26 dBA below the existing noise levels at nearby sensitive uses of 70 to 71 dBA L_{eq}. For these reasons, noise levels associated with project parking structures would not be expected to combine with parking activity noise from cumulative projects to result in a cumulative noise impact. Cumulative noise impacts related to activity at parking garage activity would be ***less than significant***.

Impact C-NOI-2: The project, in combination with past, present, and reasonably foreseeable future project, would not result in the generation of excessive ground-borne vibration or ground-borne noise levels (Less than Significant).

Vibration impacts are based on instantaneous PPV levels. Therefore, because PPV is a measure of the peak instantaneous vibration level, rather than an average, other sources of vibration operating simultaneously (e.g., for other project sites, or even on the same project site) would not be expected to combine to raise the overall peak vibration level experienced at a nearby sensitive use. Worst-case ground-borne vibration levels are generally determined by whichever equipment generates the highest vibration level at the affected location, so overall vibration levels are typically dominated by the closest and most vibration-intensive equipment being used at a given time. For example, unlike the analysis for average noise levels, in which noise levels of multiple pieces of equipment are combined to generate a maximum combined noise level, instantaneous peak vibration levels do not combine in this way. Vibration from multiple construction sites, even if they are close to one another, would not combine to raise the maximum peak vibration level (PPV) at sensitive uses near the project site. Because the cumulative impact of construction vibration from multiple construction projects near one another (or even adjacent to one another) would generally not combine to increase PPV vibration levels, the cumulative geographic context for vibration is highly localized.

The nearest cumulative projects to the project site are: The Crossings – Auto Dealerships, located approximately 200 feet west of the southwestern portion of the project site; Southline, located 350 feet or more northeast of the main project site and 150 feet east of the northern project parcel, and; the Huntington Avenue Bicycle and Pedestrian Improvements Project, located 300 feet or more south of the southeast corner of the project site. At these (and farther) distances, peak vibration levels resulting from construction of the project would not be expected to combine with vibration effects from the construction of these cumulative projects, even if they were to be under construction simultaneously, because of the nature of PPV vibration levels (as discussed previously).

In summary, because peak vibration levels do not combine to raise the maximum PPV level, vibration from multiple construction sites, even if they are close to one another, would not be expected to combine to raise the maximum PPV level at structures or sensitive receptors near the project site. Therefore, cumulative ground-borne vibration impacts related to both potential damage and annoyance would be ***less than significant***.

Impact C-NOI-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 2 miles of a public airport or public use airport, the project, in combination with past, present, and reasonably foreseeable future projects, would not expose people residing or working in the project area to excessive noise levels (Less than Significant).

There are no private airstrips in the vicinity of the project site, but the project is located approximately 1 mile from SFO and is within the 70 dBA CNEL contour for the airport. The project would include the development of new multifamily residential land uses within the 70 dBA CNEL contour for the airport, which could result in residential receptors being exposed to aircraft noise that exceeds the ALUCP compatibility standard for such uses. All other land uses proposed under the project, including office, commercial and laboratory land uses, are considered compatible with higher noise levels according to the ALUCP for SFO. According to Table IV-1 of the SFO ALUCP (entitled "Noise/Land Use Compatibility Criteria"), these types of land uses (i.e., office, business, and professional, general retail uses) are considered compatible with all airport-related noise levels.

Because the project would site new residential land uses within the 70 dBA CNEL contour for the airport, the project impact related to the exposure of persons to excessive aircraft noise is considered to be significant before mitigation. Implementation of Mitigation Measure NOI-3 would require building materials be selected and residential units be designed such that interior noise levels would be below 45 dBA CNEL. With implementation of this mitigation measure, and adoption of a Local Agency Override, the siting of residential land uses at the project site, project impacts related to aircraft noise would be considered less than significant with mitigation.

There are no cumulative projects in the vicinity of the project that would include the siting of new residential land uses within the 70 dBA contour for SFO; all cumulative development projects with residential components are already developed with residential land uses and zoned for residential use per Policy NP-4.1 of the ALUCP. Because no projects would combine with the project to introduce residential uses within the 70 dBA contour, development of the project, in conjunction with development of nearby cumulative projects, would not result in a significant cumulative impact related to the exposure of persons residing or working in the project area to excessive aircraft noise levels. Cumulative impacts related to aircraft noise from private airstrips and public use airports would be ***less than significant***.

5.5.12 Population and Housing

The cumulative geographic context for population and housing impacts includes the area within the San Bruno City boundary in combination with projected growth in the rest of San Mateo County and the surrounding region, as forecasted by ABAG. Impacts from cumulative growth were considered in the context of their consistency with regional planning efforts.

With regarding to housing displacement, the project would not contribute to cumulative impacts on housing displacement because there are no residential uses on the project site. Therefore, the following discussion focused on consistency with population, housing, and employment projections.

Impact C-POP-1 addresses cumulative impacts with respect to the topics evaluated under Impacts POP-1 and POP-2 in Chapter 3, Section 3.11, *Population and Housing*, of this EIR.

Impact C-POP-1: The project, in combination with past, present, and reasonably foreseeable future projects, would result in unplanned population growth in an area, but the project's contribution would be less than cumulatively considerable (Less than Cumulatively Considerable).

Table 5-1 identifies reasonably foreseeable projects in the City. Table 5-1 also includes the Southline project in South San Francisco, recognizing that growth from both projects would affect the same infrastructure systems due to the proximity of the sites. These reasonably foreseeable projects include mixed-use residential, multifamily retail, residential multifamily, office, and shopping center improvements. Together, if all are approved and constructed, they would provide a projected 2,166 residential units[2] and approximately 6,971,404 square feet of retail, medical, office, and hotel space.

Using a conservative generation rate,[3] 6,971,404 square feet of non-residential development associated with the related projects would generate approximately 27,885 employees. This is considered a conservative rate for the related projects and most likely overestimates related project employment. Assuming 19.5 percent of those employees live in San Bruno and generate 1.46 residents per employee (Chapter 3, Section 3.11, *Population and Housing*), related project employment could generate a demand for approximately 3,724 housing units in the City. Assuming an average household size of approximately 2.66 pph, a total of 9,907 new residents could be induced as a result of new employment in the City.

Based on the San Bruno average household size of 2.66 persons per household, the 2,166 housing units from the reasonably foreseeable projects could result in a population increase of 5,762 residents in the City.[4] When added to the employee-generated population, the reasonably foreseeable projects would add approximately 15,668 residents to the City. Similar to the project analysis in Section 3.11, *Population and Housing,* this conservatively assumes that employee-generated housing demand would not be satisfied onsite (for mixed-use projects) or by existing vacant housing units. When added to the 2,690 new City residents that could be introduced by the Scenario A, cumulative population growth would total 18,385 persons in the City of San Bruno. When added to the 3,448 new City residents that could be introduced by the Scenario B, cumulative population growth would total 19,117 persons in the City of San Bruno.

As shown in Chapter 3, Table 3.11-2, according to ABAG's *Projections 2040*, San Bruno's population will increase by approximately 3,930 residents between 2025 to 2035. Therefore, the addition of up to 19,117 new residents would exceed the population growth projected for the City by 2035. As also shown in Table 3.11-2, according to ABAG's *Projections 2040*, San Bruno's housing supply will increase by approximately 1,265 units from 2025 to 2035. Therefore, the addition of 3,680 new housing units, resulting from the combination of the project (Scenario B) and the identified cumulative projects would also exceed the housing growth projected for the City by 2035.

[2] As stated in Table 5-1, the total number of units in the cumulative project list includes the 3,165 units under the Housing Element Update (Project No. 15), plus the reasonably foreseeable projects that were not considered in the Housing Element Update. In addition, the Housing Element Update assumes that 1,002 units would be constructed at the project site. Therefore, 1,002 units have also been netted out of the total housing units since they are included as part of the project and not as part of the cumulative project total.

[3] Different uses have different worker density assumptions. For example, office uses typically generate approximately one employee per 250 square feet, while R&D uses typically generate approximately one employee per 400 square feet. Conservatively, this analysis assumes that all uses would generate one employee per 250 square feet, which is most likely an overestimation related to project employment.

[4] 2,166 dwelling units x 2.66 persons per household = 5,762 new residents

As discussed in Section 3.11, *Population and Housing*, the project alone would not exceed ABAG's growth forecasts for the City of San Bruno. However, cumulative projects and background growth would exceed the growth forecasts for both population and housing for the City. This would result in a significant cumulative impact.

The project and most of the cumulative projects in San Bruno would be located on infill sites and in proximity to many transit lines. The combination of the project and the reasonably foreseeable projects within San Bruno would not require an extension or expansion of roads, utilities, or infrastructures that would result in changes to the environment and constitute a significant impact. Furthermore, as shown in Chapter 3, Table 3.11-2, according to ABAG projections, the population of the Bay Area is expected to grow by 838,855 residents and the number of households is expected to grow by 272,075 between 2025 and 2035. The Bay Area is defined by the interconnectedness of its cities. Population, housing, and employment demographics are not confined to individual cities but are spread across the region. This interconnectedness is facilitated by a robust transportation system, including BART, Caltrain, and various bus services, which enable easy movement between cities. Other cities in the Bay Area would reasonably be assumed to accommodate the population and housing growth associated with further buildout of San Bruno, just as San Bruno accommodates employment-related growth in other cities.

Furthermore, infill development near transit, like the project, brings several benefits that contribute to a more balanced jobs-housing ratio from a regional perspective. Infill development reduces the need for long commutes, as people can live closer to their workplaces. It can also stimulate local economies by attracting businesses and services to these areas. This concentration of economic activity supports local businesses and generates job opportunities within the neighborhood, further improving the jobs-housing balance. Focusing on infill development near transit promotes sustainable growth by utilizing existing infrastructure and reducing urban sprawl. It encourages higher-density living, which is more efficient in terms of land use and resource consumption. Infill development near transit is a strategic approach to improving the regional jobs-housing balance in the San Francisco Bay Area, consistent with the overarching goals and policies in *Plan Bay Area 2050*. The project represents the exact type of development that is widely recognized to further those goals. Therefore, while cumulative impacts related to population growth within San Bruno resulting from the implementation of the project, in combination with the reasonably foreseeable future projects, would be significant, the project's contribution would be ***less than cumulatively considerable***.

5.5.13 Public Services

The cumulative geographic context for other evaluated public services is the City of San Bruno because fire protection, police protection, schools, and library services are provided on a citywide basis, and service ratios by which demand is estimated (where applicable) are based on citywide figures. The projects applicable to cumulative analysis are described in Table 5-1 and on Figure 5-1.

Impact C-PS-1 addresses cumulative impacts with respect to the topics evaluated under Impacts PS-1 through PS-4 in Chapter 3, Section 3.12, *Public Services*, of this EIR.

Impact C-PS-1: The project, in combination with past, present, and reasonably foreseeable future projects, would not result in significant cumulative impacts with respect to fire protection, police protection, school, park, or library services (Less than Significant).

Impact C-PS-1 is inclusive of Impacts PS-1, PS -2, PS -3, and PS -4. A significant cumulative environmental impact would result if the project, in combination with other past, present, and reasonably foreseeable projects, would result in substantial adverse physical impact associated with the provision of new or physically altered government facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ration, response times or other performance objectives for fire protection, police protection, school, or library services.

The project, in combination with other past, present, and reasonably foreseeable projects, would increase the cumulative demand for fire protection, police protection, schools, and library services. As described in Section 3.12, *Public Services*, the San Bruno Fire Department is currently pursuing the rehabilitation or new construction of Stations 51 and 52 to better accommodate future needs. However, the project and other future residential and commercial developments would be required under the City's Development Impact Fee (DIF) Ordinance to pay a one-time impact fee charged at the issuance of building permits. The fee is collected and used to improve and expand public capital facilities and infrastructure (such as Stations 51 and 52), or library facilities, throughout the City in order to serve new residential and commercial growth. The San Bruno Park School District (SBPSD) and the San Mateo Union High School District (SMUHSD) are also empowered to collect statutory fees from the construction of residential and commercial development which would be used to mitigate the impact of new development on school facilities. Therefore, payment of the DIF (or, in the case of schools, SBPSD and SMUHSD school developer fees) for the project and cumulative projects would ensure that cumulative impacts would be ***less than significant***.

5.5.14 Recreation

The cumulative geographic context for other evaluated recreational facilities is the City of San Bruno. The cumulative projects located within approximately 0.5 mile of the project site are described Table 5-1 and shown on Figure 5-1 of this EIR.

Impact C-REC-1 addresses cumulative impacts with respect to the topics evaluated under Impacts REC-1 and REC-2 in Chapter 3, Section 3.13, *Recreations*, of this EIR.

Impact C-REC-1: The project, in combination with past, present, and reasonably foreseeable future projects, would result in a less-than-significant impact on parks and recreational facilities (Less than Significant).

Impact C-REC-1 is inclusive of Impacts REC-1 and REC-2. Future development would have the potential to increase development and dwelling unit density, which could increase the number of residents and visitors using recreational facilities within the City and neighboring communities. This increased use could accelerate the physical deterioration of the parks or recreational facilities that these residents and visitors would use, or could result in the construction or expansion of recreational facilities that would adversely impact the environment.

The development of higher-density residential projects could also result in the construction or expansion of parks, as all new development is required to comply with general plan policies and regulations that promote the balanced distribution of the built and natural environment.

Alternatively, developers may be required to fund the construction or expansion of recreational facilities as required by the City's DIF Ordinance in the future. The construction or expansion of recreational facilities associated with this development could adversely impact the environment, as well as wildlife corridors and habitats connected to neighboring communities, which would constitute a potentially significant impact.

As shown in Chapter 3, Table 3.11-2, ABAG estimates that the population of San Bruno in 2025 is 42,630. As shown in Table 3.13-1, the City and surrounding region provide 191 acres of existing parkland, equating to 4.48 acres for every 1,000 residents, just shy of the City's goal of 4.5 acres for every 1,000 residents (General Plan Policy OSR-1). The City currently does not have plans to build or renovate existing parks that could serve the project (Gilli pers. comm.). With implementation of the project, the City would continue to be slightly deficient in meeting its parkland to population ratio.

However, because development projects within the City are required to comply with federal, state, and local regulations, and are expected to follow the goals and policies established in the general plan, recreational facilities may be constructed or expanded as a result of new residential development. New facilities would be subject to their own independent CEQA review. The project and cumulative projects would be required to provide park and recreational facilities and pay in-lieu fees as required by the City's DIF Ordinance, which provides a more streamlined calculation methodology to fund parkland acquisitions necessary to serve all new development in the City, including non-residential development. As cumulative projected growth and development must comply with existing regulations and policies, including the payment of development impact fees, recreational facilities would not be adversely impacted. Therefore, cumulative impacts on parks and recreational facilities from future growth and development within the cumulative study area would be ***less than significant***.

5.5.15 Transportation

The cumulative geographic context for the evaluation of transportation impacts differs by impact topic. Plan consistency, VMT, and freeway queuing are evaluated using regional traffic modeling tools that are inherently cumulative, while design hazards are evaluated for the roadways adjacent to the project site and the cumulative projects in the vicinity. The cumulative projects in the vicinity of the project site are described in Table 5-1 and shown on Figure 5-1 of this EIR.

Each cumulative impact addresses the topics evaluated in the corresponding project impacts in Chapter 3, Section 3.14, *Transportation*, of this EIR. For example, Impact C-TRA-1 addresses cumulative impacts with respect to Impact TRA-1, Impact C-TRA-2 addresses cumulative impacts with respect to Impact TRA-2, and so on.

Impact C-TRA-1: The project, in combination with past, present, and reasonably foreseeable future projects, would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities (Less than Significant).

As discussed in Chapter 3, Section 3.14, *Transportation*, the project in combination with cumulative network and travel pattern changes would not conflict with currently adopted goals or policies. The project would not interfere with planned transit service. Any changes to existing or future transit stops would be made in consultation with the City, SamTrans, and Commute.org such that redesigned transit stops and stop locations would align with agency and City goals and standards. Nothing in the project description would interfere with implementation of the facilities proposed in

the *Walk 'N Bike Plan, San Bruno General Plan, Transit Corridors Plan, San Bruno Local Roadway Safety Plan, BART's Walk and Bicycle Network Gap Study, San Mateo County Comprehensive Bicycle and Pedestrian Plan*, or other programs, plans, ordinances, or policies addressing the bicycle or pedestrian circulation systems.

Therefore, cumulative multimodal network impacts resulting from implementation of the project, in combination with the reasonably foreseeable future projects, would be ***less than significant***.

Impact C-TRA-2: The project, in combination with past, present, and reasonably foreseeable future projects, would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) (Less than Significant).

The project characteristics that indicate a low VMT project and allow this project to be screened from quantitative VMT analysis hold true into cumulative conditions. Project VMT is expected to continue to decrease between Baseline plus Project conditions and cumulative conditions as the area around the project site continues to densify and add better multimodal transportation options. Plan Bay Area 2050 projects significant housing development in San Mateo County, with the greatest density planned around transit corridors, such as Caltrain, BART, and El Camino Real. This development pattern means that commute trip lengths to the project site will be shorter than they are today, and some will be able to shift from auto to transit use. At a local level, the Transit Corridors Plan will add significant mixed-use density between the project site, Caltrain, and downtown San Bruno, increase train service levels for Caltrain, and improve bus service on El Camino Real. These changes will also lead to more walking and biking trips between the project site and surrounding neighborhoods for commute purposes, personal errands, and shopping trips. Therefore, project VMT impacts, in combination with the reasonably foreseeable future projects, would be ***less than significant***.

Impact C-TRA-3: The project, in combination with past, present, and reasonably foreseeable future projects, would not substantially increase hazards because of a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment) (Less than Significant).

The project and future adjacent development and street network improvements would be required to undergo review by City departments, including a review of ground-floor/street-level operations so that loading operations and vehicle access are adequately accommodated without obstructing, hindering, or impairing drivers' reasonable and safe views of other vehicles, people walking, or people bicycling on the same street or restricting the ability of a driver to stop a motor vehicle without danger of an ensuing collision. Although the project would add vehicle trips to the surrounding roadways, this general increase in vehicular traffic volumes would be distributed among multiple streets and would not itself be considered a traffic hazard.

A queue analysis was performed at freeway off-ramp termini intersections to evaluate if the project would result in a queue spillback that would affect the mainline freeway. The combination of the project and background cumulative volumes produces a mix of results: some queues are longer than the baseline plus project scenario and some are shorter. This reflects the use of horizon year 2040 volumes from the C/CAG Travel Demand Model, which are more evenly distributed across the network than the volumes associated with the specific projects (Southline and Bayhill Phase I) modeled in Baseline. As shown in Chapter 3, Table 3.14-9, the combination of cumulative conditions and the project would not result in a queue length beyond the available ramp storage capacity.

Therefore, the addition of the project would not result in substantial queuing at freeway ramp termini intersections or an impact on the mainline freeway.

Therefore, the geometric design hazards associated with the project, in combination with the reasonably foreseeable future projects, would be ***less than significant***.

Impact C-TRA-4: The project, in combination with past, present, and reasonably foreseeable future projects, would not result in inadequate emergency access (Less than Significant).

The project and cumulative foreseeable future projects would be designed in accordance with City standards, which include provisions that address emergency access. Additionally, all proposed development would be required to undergo multi-departmental City review, so that proposed vehicle access and streetscape improvements do not impede emergency access to the project site or from the San Bruno Police Department location within the same mega block as the project site. Therefore, the project would not result in inadequate emergency access, and cumulative emergency access impacts would be ***less than significant***.

5.5.16 Tribal Cultural Resources

The cumulative geographic context for Tribal cultural resources is the immediate vicinity of the project site, which is the area where construction activities, including ground-disturbing activities, could encounter Tribal cultural resources. Impact C-TCR-1 addresses cumulative impacts with respect to the topics evaluated under Impacts TCR-1 and TCR-2 in Chapter 3, Section 3.15, *Tribal Cultural Resources*, of this EIR.

Impact C-TCR-1: The project, in combination with past, present, and reasonably foreseeable future projects, would result in a significant cumulative impact on Tribal cultural resources, but the project's contribution would be less than cumulatively considerable (Less than Cumulatively Considerable With Mitigation).

Impact C-TCR-1 is inclusive of Impacts TCR-1 and TCR-2. Future development within the City of San Bruno could include ground-disturbing activities, construction, or alteration of the landscape. This has the potential to result in development-related impacts on Tribal cultural resources. It is likely that the cumulative projects would be constructed on sites where the ground surface has been disturbed or covered with fill and gravel or where modern development has occurred. Similar to the project, all cumulative projects would be required to implement mitigation measures to ensure that project activities would not result in the inadvertent destruction of Tribal cultural resources and that discovery procedures pertaining to human remains would be implemented. Nonetheless, cumulative impacts on Tribal cultural resources are considered potentially significant because the reasonably foreseeable projects could involve ground-disturbing activities that could uncover resources related to resources that could be uncovered by the project.

As with the project, future development projects would be required to adopt mitigation measures to ensure that project activities would not result in the inadvertent destruction of a Tribal cultural resource. As stated previously, no responses to notification letters have been received by the City from Native American Tribal representatives. No Tribal cultural resources have been identified on the project site. Implementation of **Mitigation Measure CUL-2-A** and **Mitigation Measure CUL-2-B** in Section 3.3, *Cultural Resources*, would reduce impacts by requiring archaeological resources sensitivity training and allowing early detection of potential conflicts between development.

As such, implementation of **Mitigation Measure CUL-2-A** and **Mitigation Measure CUL-2-B** would ensure that the project's contribution to cumulative impacts on Tribal cultural resources would be ***less than cumulatively considerable with mitigation***.

5.5.17 Utilities

The cumulative geographic contexts for utilities and service systems are the service territories of the various utility providers. For water, the geographic context are the areas served by purchased SFPUC water resources in the City of San Bruno. For wastewater, the geographic context is the Cities of South San Francisco, San Bruno, and Colma, which all flow to the same Water Quality Control Plan (WQCP). For stormwater, the geographic context is the City's storm drain system. For solid waste, the geographic context is the service areas of the San Bruno Transfer Station and Corinda Los Trancos Landfill. For electricity, natural gas, and telecommunications, the geographic context is the service areas of PG&E and the various telecommunication providers. Given the size of each area, it is beyond the scope of this EIR to identify every cumulative project within their boundaries.

Over time, growth throughout the City and County will result in increased demand for water, wastewater treatment, solid waste disposal, natural gas, electricity, and telecommunications. As shown in Section 3.11, *Population and Housing*, Table 3.11-2 of this EIR, ABAG projects the City's population will increase by approximately 3,930, from 42,630 in 2025 to 46,560 in 2035. In addition, ABAG projects the number of jobs in the City will decrease by 150 jobs between 2025 and 2035. ABAG also projects the County's population will increase by approximately 60,335, from 805,875 in 2025 to 866,210 in 2035, and that the total number of jobs in San Mateo County would increase by 20,900 between 2025 and 2035. Citywide and countywide growth would also generate increased demand for utilities. With regard to local water, wastewater, and storm drain infrastructure, nearby cumulative development is also relevant. The cumulative projects located within the City of San Bruno are described in Table 5-1 and shown on Figure 5-1 of this EIR.

Much of the analysis presented above for project-specific effects also includes analysis of potential cumulative impacts on utilities and service systems. The project, in combination with other cumulative development, would result in increased demands on utilities and service systems, as summarized below.

Each cumulative impact addresses the topics evaluated in the corresponding project impacts in Chapter 3, Section 3.16, *Utilities*, of this EIR. For example, Impact C-UT-1 addresses cumulative impacts with respect to Impact UT-1, Impact C- UT -2 addresses cumulative impacts with respect to Impact UT -2, and so on.

Impact C-UT-1: The project, in combination with past, present, and reasonably foreseeable future projects, would result in a significant cumulative impact on water, wastewater, storm drain, or electricity, natural gas, and telecommunication services facilities infrastructure, but the project's contribution would be less than cumulatively considerable (Less than Cumulatively Considerable with Mitigation)

5.5.17.1 Water Facilities

The evaluation of water infrastructure capacity in Section 3.16, *Utilities*, Impact UT-1, is based on the *Water System Hydraulic Evaluation of the Tanforan Redevelopment Project*, which accounts for projected buildout under the City's 2022 Water System Master Plan. Therefore, the analysis is inherently cumulative. As discussed, velocities in all existing and new Zone 1/4A pipelines near the project site would be below 4 ft/s during a peak hour demand condition. However, the 8-inch diameter pipelines upstream and downstream of Pressure Regulating Station RS20 would have a velocity of approximately 5 to 6 ft/s, which exceeds the City's maximum pipeline velocity constraint of 4 ft/s. Cumulative projects in the vicinity would contribute to the increased flows, resulting in a significant cumulative impact. **Mitigation Measure UT-1-a** requires the project to upsize the existing pipeline upstream and downstream of Pressure Regulating Station RS20 (along Huntington Avenue) to 12-inches in diameter (approximately 520 linear feet of pipeline) to address high pipeline velocities. **Mitigation Measure UT-1-b** requires the project to design the on-site water system to provide continuous looping to serve fire flow demand. As a City requirement, all cumulative projects would also be required to provide sufficient water infrastructure for their anticipated demand, and comply with all City requirements regarding new water facilities and fire flow requirements. Implementation of the mitigation measures would ensure that the project's contribution to the cumulative impact is ***less than cumulatively considerable with mitigation***.

5.5.17.2 Wastewater Facilities

The evaluation of wastewater infrastructure capacity in Section 3.16, *Utilities*, Impact UT-1, is based on the *Tanforan Redevelopment Project Sewer Impact Study* and the *Hydraulic Modeling Study*, which accounts for projected buildout under the Sewer Master Plans of the Cities of San Bruno and South San Francisco, respectively. Therefore, the analysis is inherently cumulative. As discussed, while sewage infrastructure in the City of South San Francisco would have capacity to accommodate the cumulative sewage demand, the proposed 30-inch high-density polyethylene (HDPE) sewer in Sneath Lane (in San Bruno) would be surcharged for its entire length, with a predicted freeboard of about 3 feet at the upstream end. This would violate the City's Master Plan criteria for design of new sewers. **Mitigation Measure UT-1-c** requires the project to extend the line downstream from Seabiscuit Lane (manhole 1349) to Huntington Avenue (manhole 1344), totaling approximately 1,022 feet. As a City requirement, all cumulative projects would also be required to provide sufficient wastewater infrastructure for their anticipated demand, and comply with all City requirements regarding new wastewater facilities. Implementation of the mitigation measure would ensure that the project's contribution to the cumulative impact is ***less than cumulatively considerable with mitigation***.

5.5.17.3 Stormwater Drainage Facilities

As discussed in Section 5.5.9, *Hydrology and Water Quality*, cumulative development within the City would likely be constructed on infill sites in highly urbanized areas where there is a substantial amount of existing impervious surface area. All cumulative projects would be required to include post-construction stormwater management features, such as LID measures, to reduce flows to pre-project conditions. New projects would be subject to the requirements of the San Francisco Bay MS4 Permit, the Construction General Permit, and the *San Bruno General Plan* and Municipal Code related to protecting water resources.

The evaluation of storm drain capacity in Section 3.8, *Hydrology and Water Quality*, Impact HWQ-3, accounts for projected buildout under the City's Storm Drain Master Plan. Therefore, the analysis is inherently cumulative. As discussed, while most areas would experience a decrease in peak flows under the project, the storm drain mains on Sneath Lane are predicted to experience an increase in peak flow. Although the area has not previously experienced drainage capacity concerns and the additional flow is not expected to cause substantial flooding issues, the increase in stormwater peak flows and total volume is notable. Cumulative projects in the vicinity would contribute to the increased flows, resulting in a significant cumulative impact. **Mitigation Measure HWQ-3** requires the project to prepare a site-specific survey to demonstrate that the existing system in Sneath Avenue can adequately accommodate the additional stormwater flow rates and volumes. Implementation of the mitigation measure would ensure that the project's contribution to the cumulative impact is ***less than cumulatively considerable with mitigation***.

5.5.17.4 Electricity, Natural Gas, and Telecommunication Facilities

The cumulative development in the PCE, PG&E, and telecommunication providers service areas would likely be constructed on infill sites in highly urbanized areas; it is anticipated that these projects would not substantially increase electric power, natural gas, and telecommunications demands. There are also no known capacity limitations within the existing electrical system or gas system. Service providers of these utilities will be able to serve new cumulative development from known and available sources. In addition, similar to the project, the anticipated cumulative development would comply with all applicable City and state energy conservation measures, including Title 24, part 6, the California Energy Code, with baseline standard requirements for energy efficiency; the 2022 Building Energy Efficiency Standards; and the 2022 CALGreen Code. For these reasons, the project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a significant cumulative natural gas, electricity, and telecommunications demand and facilities impact. The cumulative impact would be ***less than significant***.

Impact C-UT-2: The project, in combination with past, present, and reasonably foreseeable future projects, would not result in a significant cumulative impact on water supply (Less than Significant).

The evaluation of water supply in Section 3.16, *Utilities*, Impact UT-2, is based on the Water Supply Assessment prepared for the project, which is inherently cumulative because it is based on demand and supply projections for the City, as presented in the 2020 Urban Water Management Plan. As discussed, a cumulative impact would occur during single dry years and multiple dry years due to projected supply shortfalls related to implementation of the Bay-Delta Amendment. However, the City can implement its Water Shortage Contingency Plan to reduce demand to the level of available supply. The plan stages required to achieve the necessary demand reductions range from Stage 1 to Stage 3. With implementation of the Water Shortage Contingency Plan and other water conservation measures and water use restrictions, the cumulative impact on water supply would be ***less than significant***.

Impact C-UT-3: The project, in combination with past, present, and reasonably foreseeable future projects, would not result in a significant cumulative impact on wastewater treatment capacity (Less than Significant).

Cumulative development would generate additional wastewater, creating a cumulative increase in demand for wastewater treatment at the WQCP. The WQCP currently treats approximately 7 million gallons per day (MGD) of wastewater under average dry weather flow conditions, which is substantially below its maximum capacity of 13 MGD under average dry weather flow days. The WQCP, therefore, has sufficient capacity to treat the additional wastewater that would be generated by the project, as well as the additional wastewater that would be generated by the cumulative projects. While future development would also contribute to cumulative demand, given the remaining capacity at the WQCP (6 MGD) and the ongoing wet-weather treatment and storage capacity improvements at the WQCP, it is unlikely that additional development within or outside of the City would result in an exceedance of capacity because the City would require the proponents of each project to provide project-specific sewer capacity studies. Therefore, the project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a significant cumulative wastewater impact, as wastewater generation would not exceed WQCP treatment system capacity. The cumulative impact would be ***less than significant***.

Impact C-UT-4: The project, in combination with past, present, and reasonably foreseeable future projects, would not result in a significant cumulative impact on solid waste generation or on failure to comply with federal, state, and local management and reduction statutes and regulations related to solid waste (Less than Significant).

Construction of the project, as well as construction activities required for cumulative development within the service areas of the San Bruno Transfer Station and Corinda Los Trancos Landfill, would generate substantial solid waste, including demolition waste. However, all cumulative projects would be required, at a minimum, to comply with the CALGreen Code and Chapter 10.23 of the City's municipal code, which would substantially reduce construction-generated solid waste. Therefore, through compliance with CALGreen Code and local requirements, the project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a significant cumulative construction-generated solid waste impact related to solid waste generation or failure to comply with federal, state, and local management and reduction statutes and regulations related to solid waste. The cumulative impact would be ***less than significant***.

In 2023, City residents generated approximately 3.3 pounds of solid waste per capita per day and employees generated 8.8 pounds of solid waste per capita per day (CalRecycle 2025a). The anticipated cumulative development within the service areas of the San Bruno Transfer Station and Corinda Los Trancos Landfill would incrementally increase the amount of solid waste generated by increasing the number of employees and residents in the service areas; excavation, demolition, and remodeling activities associated with growth would also increase total solid waste generation. However, the San Bruno Transfer Station is capable of processing and redistributing up to 768 tons per day of solid waste, and the Corinda Los Trancos Landfill had a remaining capacity of approximately 17,240,000 cubic yards (CalRecycle 2025b). The project, in combination with anticipated cumulative development, would generate a very small amount of solid waste in comparison to the total remaining capacities of each facility.

In addition, the increasing rate of diversion citywide and in the service areas, achieved through recycling, composting, and other methods, would decrease the total amount of waste deposited in landfills. The project, in combination with the anticipated cumulative development in the service areas, would not cause a significant impact on regional landfill capacity because the projects would be required to comply with the City's waste reduction and diversion requirements. Compliance with such regulatory requirements would reduce the project's and the cumulative projects' contribution to overall solid waste volumes generated during construction and operation. Given the future long-term capacity available at Ox Mountain Sanitary Landfill and other area landfills, the project and anticipated cumulative development in the services areas would be served by a landfill with adequate permitted capacity to accommodate their solid waste disposal needs. For these reasons, the project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a significant cumulative solid waste impact related to solid waste generation or failure to comply with federal, state, and local management and reduction statutes and regulations related to solid waste. The cumulative impact would be ***less than significant***.

Chapter 6
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