

Town of Hillsborough

6TH CYCLE HOUSING ELEMENT UPDATE

DRAFT ENVIRONMENTAL IMPACT REPORT



October 2023

Draft EIR



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ACRONYMS, ABBREVIATIONS, AND SYMBOLS	
Acronym/Symbol	**Full Phrase or Description**
AB	Assembly Bill
ABAG	Association of Bay Area Governments
ADU	Accessory Dwelling Unit
ACHP	Advisory Council on Historic Preservation
ACM	asbestos-containing material
ADA	Americans with Disabilities Act
ADRB	Architecture and Design Review Board
ADT	Average Daily Traffic
ADU	Accessory Dwelling Unit
ALUC	Airport Land Use Commission
APN	Assessor Parcel Number
BAAQMD	Bay Area Air Quality Management District
BART	Bay Area Rapid Transit
BCDC	San Francisco Bay Conservation and Development Commission
BMPs	Best Management Practices
BRT	Bus Rapid Transit
CAAQS	California Ambient Air Quality Standards
Cal EPA	California Environmental Protection Agency
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Standards Code
CAP	Climate Action Plan
Caltrans	California Department of Transportation
CalOSHA	California Occupational Safety and Health Administration
CalRecycle	California Department of Resource Recycling and Recovery
CARB	California Air Resources Board
CBSC	California Buildings Standards Code
CBPP	Countywide Bicycle and Pedestrian Plan
CCFD	Central County Fire District
CCR	California Code of Regulations
C/CAG	City/County Association of Governments of San Mateo County
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission

ACRONYMS, ABBREVIATIONS, AND SYMBOLS	
Acronym/Symbol	**Full Phrase or Description**
CERT	Community Emergency Response Team
CERCLA	Comprehensive Emergency Response Compensation and Liability Act
CESA	California Endangered Species Act
CFC	Chlorofluorocarbon
CFR	Code of Federal Regulations
CFP	California fully protected
CGC	California Government Code
C_H4	Methane
CNPS	California Native Plant Society
CNRA	California Natural Resources Agency
CHP	California Highway Patrol
CHL	California Historical Landmarks
CHRIS	California Historical Resources Information System
CLUP	comprehensive land use plan
CMA	Construction management Agency
CMP	Congestion Management Program
CNDDB	California Natural Diversity Database
CO	Carbon Monoxide
CO2	Carbon Dioxide
CO2e	Carbon Dioxide Equivalent
CRLF	California red-legged frog
CRHR	California Register of Historical Resources
CSSC	California species of special concern
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
dB	Decibel (unweighted)
dBA	Decibels, A-Weighted
DHS	California Department of Health services
DPM	Diesel Particulate Matter
DTSC	California Department of Toxic Substance Control
EO	Executive Order
EV	Electric Vehicle

ACRONYMS, ABBREVIATIONS, AND SYMBOLS	
Acronym/Symbol	**Full Phrase or Description**
GHG	Greenhouse Gases
GWP	Global Warming Potential
FAR	Floor Area Ratio
FEMA	Federal Emergency Management System
FESA	Federal Endangered Species Act
GGNPC	Golden Gate National Parks Conservancy
GHG	Greenhouse Gas
GPU	General Plan Update
HCD	California State Department of Housing and Community Development
HCP	Habitat Conservation Plan
HHW	Household Hazardous Waste Program
HIP Housing	Human Investment Project Housing
HMTUSA	Hazardous Materials Transportation Uniform Safety Act
HPD	Hillsborough Police Department
HFC	Hydrofluorocarbon
HWY	Highway
IAQ	Indoor Air Quality
I-	Interstate
IPaC	
JADU	Junior Accessory Dwelling Unit
LAFCO	San Mateo County Local Agency Formation Commission
LOS	Level of Service
LRA	Local Responsibility Area
LQG	Large quantity generator
LUST	Leaking underground storage tank
LCFS	Low Carbon Fuel Standard
LEV	Low-Emission Vehicle
MBTA	Migratory Bird Treaty Act
MMBTU	Million British Thermal Units
$MTCO_2e$	metric tons of CO_2 equivalents
MWh	Mitigation Monitoring and Reporting Program
MND	Mitigated Negative Declaration
mph	Miles per hour

ACRONYMS, ABBREVIATIONS, AND SYMBOLS	
Acronym/Symbol	**Full Phrase or Description**
MTC	Metropolitan Transportation Comm
MRP	Municipal Regional Stormwater NPDES Permit
MSL	Mean Sea Level
MLD	Most Likely D
NAGPRA	Native American Graves Protection and Repatriation Act
NAHC	Native American Heritage Commission
NDRF	National Disaster Recovery Network
NEHRP	National Earthquake Hazards Reduction Program
NEPA	National Environmental Policy Act
NEHRP	National Earthquake Hazards Reduction Program
NHPA	National Historic Preservation Act
NIMS	National Incident Management System
NOD	Notice of Determination
NOP	Notice of Preparation
NOx	Oxides of Nitrogen
NPDES	National Pollutant Discharge Elimination System
NRF	National Response Framework
NWIC	Northwest Information Center
OPR	Office of Planning and Research
NO	Nitric Oxide
NO_2	Nitrogen Dioxide
NOAA	National Oceanic and Atmospheric Administration
N_2O	Nitrous Oxide
PFC	Perfluorocarbon
PCBs	Polychlorinated Byphenyls
PCRC	Peninsula Conflict Resolution Center
PCBs	polychlorinated biphenyls
ppm	Parts Per Million
PPV	Peak Particle Velocity (inches/second)
PRC	Public Resources Code
RCRA	Resources Conservation and Recovery Act
RHNA	Regional Housing Needs Assessment
ROG	reactive organic gases

ACRONYMS, ABBREVIATIONS, AND SYMBOLS	
Acronym/Symbol	**Full Phrase or Description**
RWQCB	Regional Water Quality Control Board
SMCTA	San Mateo County Transportation Authority
SB	Senate Bill
SFBAAB	San Francisco Bay Area Air Basin
SCH	State Clearing House
SEMS	Standardized Emergency Management System
SF_6	Sulfur Hexafluoride
SFO	San Franscisco International Airport
SFPUC	San Francisco Public Utilities Commission
SHPO	State Historic Preservation Officer
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
SO_4^{2-}	Sulfates
SO_x	Sulfates
SOI	sphere of influence
SR	State Route
SRA	State Responsibility Area
SVCW	Silicon Valley Clean Water
STOPPP	San Mateo Stormwater Pollution Prevention Program
SWAT	Special Weapons & Tactics Team
SWPPP	Stormwater Pollution Prevention Program
SWRCB	State Water Resources Control Board
TAC	Toxic Air Contaminants
TAZ	Transportation Analysis Zones
TCR	Tribal Cultural Resources
TDM	Transportation Demand Management
TISG	Transportation Impact Study Guide
TNC	Transportation Network Companies
Town	Town of Hillsborough
TRI	Toxic Release Inventory
USACE	U.S. Army Corps of Engineers
USFWS	U.S. Fish and Wildlife Services
VHFHSZ	Very High Fire Hazard Severity Zones

ACRONYMS, ABBREVIATIONS, AND SYMBOLS	
Acronym/Symbol	**Full Phrase or Description**
WUI	Wildland Urban Interface
WGCEP	Working Group on California Earthquake Probabilities
VMT	Vehicle Miles Traveled
VOCs	volatile organic compounds
$\mu g/m^3$	micrograms per cubic meter
ZEV	Zero Emission Vehicle
°F	Degrees Fahrenheit
%	Percent

CHAPTER 1 INTRODUCTION

This Draft Environmental Impact Report (Draft EIR) has been prepared by the Town of Hillsborough ("Town") in accordance with the California Environmental Quality Act (CEQA)[1] and the State CEQA Guidelines (CEQA Guidelines)[2] to describe the potential environmental consequences, also known as impacts, from implementation of the proposed 2023 – 2031 Housing Element Update to the 2005 Town of Hillsborough General Plan, associated amendments to other elements in the General Plan as necessary to ensure consistency; and amendments to the Hillsborough Municipal Code to provide for effective implementation of the Project (collectively the "Project" or "Focused GPU" – e.g., a focused general plan update)[3] The proposed Project consists of updates to the existing 2014 - 2022 Housing Element to reflect the 6th cycle 2023 – 2031 housing assignments as mandated by the requirements for General Plans in State Planning and Zoning Law; associated amendments to other elements of the 2005 General Plan as necessary to ensure consistency; and amendments to the Hillsborough Municipal Code to provide consistency with the General Plan amendments and for effective implementation of the Project.[4]

This Draft EIR is intended to serve as an informational document for use by public agency decision makers and the public in their consideration of the proposed Project.

CEQA and the State CEQA Guidelines charge public agencies with the responsibility of informing governmental decision makers and the public about the potentially significant environmental effects of proposed activities; identifying the ways that environmental damage can be avoided or significantly reduced; preventing significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and disclosing to the public the reasons a governmental agency approved the project in spite of one or more significant environmental effects.[5]

The Town of Hillsborough, as the Lead Agency, has prepared this EIR for the proposed Project in accordance with CEQA and the State CEQA Guidelines. In making its decision about the proposed Project, the Town must consider the information in this EIR along with any other available information.

1.1 EIR Purpose and Intended Use

State law requires each city and county to adopt a general plan containing at least the seven mandatory elements, including a housing element. Unlike the other general plan elements, the housing element, which is required to be updated at least once every eight years, is subject to

[1] California Public Resources Code, Section 21000 et seq.

[2] California Code of Regulations, Title 14, Section 15000 et seq.

[3] For this EIR, the term "Project" applies to both the Housing Element Update, plus associated amendments to the General Plan and Municipal Code proposed to facilitate implementation of the policies and programs included in the Housing Element Update. The term "project" as used in this EIR refers any other development proposal or application subsequent to adoption of the Project.

[4] See EIR Chapter 3, Project Description, for a complete discussion of the Project.

[5] California Public Resources Code Section 21002.

detailed statutory requirements and mandatory review by a State agency, the California Department of Housing and Community Development (HCD). The last update to the Hillsborough Housing Element was adopted by the Town in 2014, and then certified by HCD as complying with State law. It addresses the planning period from 2015 through 2023.

The Town has now prepared an update to the Housing Element (Housing Element Update) for the planning period 2023 through 2031. Once it is approved by HCD, the updated 2023 – 2031 Housing Element will be incorporated into the 2005 General Plan.

As part of informing decision-makers, other responsible agencies, and the general public of the proposed Project and its environmental consequences, this EIR is intended to provide the CEQA-required environmental review for the proposed Project, which includes adoption of the proposed General Plan amendments as well as associated changes to the Town's Municipal Code, including zoning code changes.

The adoption and implementation of a General Plan Update (GPU) is defined as a "project" and is subject to review under the California Environmental Quality Act (CEQA) 1970 (Public Resources Code, Section 21000 et seq.), and the State CEQA Guidelines (California Code of Regulations, Section 15000 et seq.). Accordingly, the Town has prepared this environmental impact report (EIR) to assess the long range and cumulative environmental consequences that could result from adoption and implementation of the proposed Focused GPU. The content of this document reflects the independent judgment of the Town.

The EIR is intended to serve as a public information and disclosure document identifying and analyzing those environmental impacts resulting from the Project that are expected to be significant and describing mitigation measures and alternatives that could avoid or reduce significant adverse impacts and increase beneficial effects.[6] This is a program EIR consistent with the programmatic level of detail of the proposed Project (see Section 1.3 below). Accordingly, impacts and mitigation are discussed in this EIR at the level of detail sufficient to allow a reasoned decision about the Project. As a result of the information in this EIR, the Hillsborough City Council may act to approve or deny the proposed Project actions and/or to establish requirements or conditions of approval for future development projects that are considered necessary to mitigate identified Project impacts on the environment.

The Town of Hillsborough is the lead agency for the Project. A lead agency, as defined in Section 15367 of the State CEQA Guidelines, is "the public agency that has the principal responsibility for carrying out or approving a project."

The 2023 – 2031 Housing Element Update will be considered by the Hillsborough City Council for adoption. No discretionary approvals or permits are required by other agencies following certification of the Final EIR. Following Town approval, HCD will be asked to certify the Town's Housing Element Update. There are no responsible or trustee agencies for this Project pursuant to CEQA.

As a program EIR (see below), the Town may rely on this EIR in evaluating and acting on subsequent, site-specific housing development proposals in the Town's Planning Area (the area

[6] CEQA Guidelines Section 15149(b).

within the Town's identified boundaries plus any areas identified in the Town's Sphere of Influence), to the extent that such future reliance on this EIR is permitted by CEQA and the State CEQA Guidelines.

To avoid repetition and provide a manageable environmental document, this Draft EIR does not duplicate the detailed contents of the Draft 2023 – 2031 Housing Element Update. The reader is encouraged to review those documents, for more detail. Copies of the Housing Element Update, and this Draft EIR are available for viewing at Town offices at: Town of Hillsborough Town Hall, 600 Floribunda Ave, Hillsborough, CA 94010. The Draft 2023 – 2031 Housing Element and other information about the Towns's Housing Elements update process are also available online at the following web addresses:

Draft 2023 – 2031 Housing Element:
https://www.hillsborough.net/DocumentCenter/View/5534/20230925-Revised-Draft-Housing-Element-clean?bidId

Other Housing Element Information:

https://www.hillsborough.net/553/2023-2031-Housing-Element-Update

1.2 Proposed Project

1.2.1 Overview

The proposed Project is comprised of updates to the existing 2014 – 2023 Housing Element in compliance with the requirements for General Plans in State Planning and Zoning Law; associated amendments to other elements in the General Plan as necessary to ensure consistency; and amendments to the Hillsborough Municipal Code to provide for effective implementation of the Project (collectively the "Project" or "Focused GPU" – e.g., a focused general plan update), and is described in more detail in Chapter 3, Project Description, of this EIR.

The Project proposes goals, policies, and programs that will provide Town staff and discretionary bodies with a foundation for decisions related to long-range planning for housing development. The goals of the Project are to revise the adopted Housing Element to create a policy framework for promoting the preservation and improvement of existing housing, encouraging a variety of housing, and removing potential governmental constraints and barriers to housing development and promote equal housing opportunities for all people.

1.2.2 Project Background

The Association of Bay Area Governments (ABAG) representing nine counties and 101 cities and towns in the San Francisco Bay area region, working with a designated Housing Methodology Committee (HMC), distributes a share of the region's housing need to each city, town, and county in the region. The assignment of a specific number of housing units to each community is called the Regional Housing Needs Allocation, or RHNA. As part of RHNA, the HCD determines the total number of new homes California needs to plan for, and their affordability levels to meet the housing needs of people at all income levels. Each local government must then update its Housing Element to show the locations where housing can be

built to accommodate the RHNA and the policies and strategies necessary to ensure this housing is actually constructed.

For the ABAG region, the RHNA covers an 8.5-year projection period (2023 - 2031, also known as the Sixth Cycle) and is divided into four income categories: very low, low, moderate, and above moderate (within the very low-income category is the “extremely low-income category). The ABAG region’s projected housing need is 441,176 new housing units for the Sixth Cycle

The Town of Hillsborough has a RHNA assignment of 554 new housing units for the 2023 - 2031 planning period. This is broken down into 155 very low-income units, 89 low-income units, 87 moderate-income units, and 223 above moderate-income units. The RHNA assignment represents approximately 14 percent of the existing housing units within the Town limits. Because the Housing Element must plan for or have policies in place to accommodate the RHNA assignment in any given planning period, jurisdictions typically plan for a slightly higher number of housing units than the actual RHNA assignment (considered “buffer” units and required by HCD). This allows for some market variation and demand. In addition, as HCD completes their review of the Housing Element, some of these sites may be removed. For the purposes of this CEQA document, the Town is planning for and evaluating a total of 605 units (554 RHNA + 51 buffer units).

1.2.3 Housing Element Update

To meet the RHNA target, the Town is implementing different categories of strategies to increase residential capacity including:

- Accessory dwelling units (ADUs) and junior ADUs,
- Pipeline projects (projects in varying stages of the approval process),
- Vacant opportunity sites (single vacant parcels that could be suitable for development),
- Subdivision/lot split opportunity sites (larger sites that could allow for subdivision or lot splits); and
- Multi-family opportunity sites (sites that could be suitable for multi-family development, either based on property owner interest or Town owned land).

Housing elements identify possible sites where future homes can be built, called “Opportunity Sites,” and identify the potential number of homes that can be built on these sites. After extensive discussion and community outreach, the Town has determined five approaches to produce the number of sites to meet the RHNA assignment: Approach 1: Accessory Dwelling Units (ADUs); Approach 2: Pipeline Projects; Approach 3: Vacant Opportunity Sites; Approach 4: Subdivision/Lot Split Opportunity Sites; and Approach 5: Multi-Family Opportunity Sites. These approaches are further described in Chapter 3, Project Description.

1.2.4 Amendments To The General Plan And Municipal Code

The Town of Hillsborough proposes to comprehensively update the existing 2014 - 2022 Housing Element as required by state housing law, and make minor amendments to the Land Use Element and General Plan Land Use Map, Open Space and Conservation Element, and Public Safety Element needed to be consistent with the updated 2023 – 2031 Housing Element, as well as make amendments to Title 17 (Zoning) of the Hillsborough Municipal Code, and amendments to the Hillsborough Zoning Map. Amendments to Title 17 and the Zoning Map are

made to comply with California Government Code (CGC) Section 65300 et seq. that require zoning to be consistent with the Focused General Plan Update (proposed Project) and amendments to the General Plan Land Use Map. It is important to note that the Land Use Element and General Plan Land Use Map, Open Space and Conservation Element, and Public Safety Element are being updated only to reflect and support the updated Housing Element.

The Town is preparing a comprehensive update to the Public Safety Element separately (not part of this proposed Project), which will address climate change resiliency and wildfire planning as required by SB 379 and CGC section 65302[g].[7]

The proposed Focused GPU (the Project) is a long-range planning program to guide the growth and development of residential housing within the Town's corporate boundaries. It is intended to communicate the Town's vision for the future and to establish a policy framework to govern decision making concerning the physical development of the community and the protection of the public from environmental hazards. Although it will allow for an overall increase in housing development for the entire Planning Area, the Project would not, by itself, authorize any specific development project or other form of land use approval of any kind public facilities or capital facilities expenditures or improvements.

1.3 Program EIR Approach and Analysis Methodology

1.3.1 Program EIR

This EIR has been prepared as a program EIR. A program EIR is a type of EIR authorized by section 15168 (Program EIR) of the State CEQA Guidelines for use in documenting the environmental impacts of community general plans, specific plans, precise plans, and other planning "programs." As explained in the State CEQA Guidelines, a program EIR is useful in evaluating the potential environmental impacts of a project that involves a series of interrelated actions that can reasonably be characterized as a single project.

CEQA distinguishes between project and program EIRs, defining a program EIR as one that addresses a series of actions that can be characterized as one large project and can be related (1) geographically; (2) as logical parts in the chain of contemplated actions; (3) in connection with the issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program; or (4) as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects that can be mitigated in similar ways.

The advantages of a program EIR include consideration of effects and alternatives that cannot practically be reviewed at the level of an individual development project; consideration of cumulative impacts that may not be apparent on a project-by-project basis; the ability to enact jurisdiction-wide mitigation measures; and subsequent reduction in paperwork.

[7] State General Plan Law requires a city or county (or city and county) that concurrently adopts or revises two or more general plan elements on or after January 1, 2018 to adopt or review the environmental justice element or the environmental justice goals, policies, and objectives in other elements if the city, county, or city and county has a disadvantaged community. The Town of Hillsborough does not have any SB 535-designated disadvantaged communities and therefore this requirement does not apply. CA Govt Code § 65302(h) (2023).

This EIR describes the reasonably foreseeable town wide impacts of the Project. Further, this EIR describes the cumulative, aggregate effects of the Project and describes impacts at a level of detail consistent with the level of detail of the proposed Project.

In accordance with the definition of a “program EIR” (State CEQA Guidelines section 15168), the EIR evaluates the potential environmental impacts of the collective, overall development potential and not the future site-specific impacts of any individual development project, the details of which are not known at this time.

This Program EIR is consistent with the programmatic level of detail of the proposed Project. Accordingly, impacts and mitigation are discussed in this EIR at a level of detail sufficient to allow a reasoned decision about the Project. As a result of the information in this EIR, the Town of Hillsborough City Council may act to approve or deny the proposed Project actions and/or to establish requirements or conditions of approval for future development projects that are considered necessary to mitigate identified project impacts on the environment. Pursuant to CEQA Guidelines Section 15168, later activities within the scope of the Focused GPU will be reviewed in light of this EIR. Later environmental analysis may focus on those site-specific and localized environmental issues that could not be examined in sufficient detail as part of this Program EIR.

1.3.2 Intended Uses of the EIR

This EIR provides the environmental review required for the Town to approve the Project, which is comprised of: (1) updates to the Housing Element of the 2005 General Plan as mandated by the requirements for General Plans in State Planning and Zoning Law; (2) associated amendments to other elements in the 2005 General Plan as necessary to ensure consistency; and (3) amendments to the Hillsborough Municipal Code to provide for effective implementation of the Project. In order to approve the Project, the City Council will need to certify that the Final Environmental Impact Report complies with CEQA, make Findings, adopt a Mitigation Monitoring and Reporting Program, and adopt a Statement of Overriding Considerations.

The adoption of the proposed Project would not result in the immediate construction of any new residential development or approval of any new site-specific project. All future residential development projects proposed within the Town Planning Area would require site-specific applications subject to the Town’s development review and approval processes. Any projects requiring discretionary approval by the Town would require environmental documentation to comply with CEQA, where applicable, and other environmental requirements (e.g., County, State). Non-discretionary (ministerial) projects must be consistent with State and Town requirements.

Subsequent activities undertaken by the Town and applications for future residential development projects facilitated by the 2023 – 2031 Housing Element Update will be examined for consistency with this program EIR to determine the appropriate level of environmental review required under CEQA. Such subsequent implementation activities may include the following:

- Approval of tentative maps, variances, conditional use permits, and other land use permits and entitlements
- Approval of development agreements
- Approval of facility and service master plans and financing plans

- Approval and funding of public improvement projects
- Approval of resource management plans
- Issuance of permits and other approvals necessary for implementation of the General Plan
- Issuance of permits and other approvals necessary for public and private development projects
- Future amendments to the Town's Housing Element and other General Plan Elements

In addition, as the Lead Agency, the Town also intends this EIR to serve as the CEQA-required environmental documentation for consideration by other agencies that may have discretionary authority over future projects affected by the Housing Element Update (e.g., California Department of Fish and Wildlife, California Department of Transportation).

1.3.3 Use of the EIR for Review of Future Development Proposals

Future site-specific residential development facilitated by the Project would be evaluated for consistency with this EIR if and when the development is proposed. Future projects will be reviewed to determine whether they are subject to CEQA compliance at such time as the Town receives a permit application for the project and the details of the individual project are defined. At that time, and if the project is subject to CEQA, the environmental analysis would address potential environmental impacts specific to the project such as effects on the consistency with General Plan policies; consistency with building and engineering regulations of the Town; site-specific biological, cultural resource, and visual effects; impacts on on-site and off-site drainage.

This program EIR has been prepared to allow for streamlining future CEQA compliance by providing program-level information and data about the Housing Opportunity Sites, and by identifying potentially significant environmental impacts and associated mitigation measures that may be used in analyzing future site-specific, discretionary development projects. For example, the mitigation measures in the EIR contain specific actions and performance standards that must be implemented for site-specific, individual development projects and public improvements.

Environmental review of future projects could proceed pursuant to State CEQA Guidelines sections 15168 (Program EIR), 15183 (Projects Consistent With a Community Plan, General Plan, or Zoning), 15183.3 (Streamlining for Infill Projects), 21094 (Later Projects; Tiered Environmental Impact Reports; Initial Study; Use of Prior Reports), 15152 (Tiering), 15162 (Subsequent EIRs and Negative Declarations), 15163 (Supplement to an EIR), 15164 (Addendum to an EIR or Negative Declaration), other CEQA streamlining provisions, or Public Resources Code Section 21155.4 (Implementation of the Sustainable Communities Strategy). As explained above, any such individual discretionary project would be subject to Town review, and may also require its own CEQA review, including evaluation for consistency with this EIR.

If, during review of a subsequent project subject to CEQA, the Town determines that (1) the individual project is within the scope of the program examined in the program EIR, (2) no new effects that are not otherwise examined in the program EIR will occur as a result of the individual project, and (3) no new mitigation measures are required, then no additional environmental review will be required for that project. If these conditions are not met and a subsequent EIR or negative declaration is required, this program EIR can (1) provide the basis in an initial study for determining whether the later activity may have any significant effects, (2)

be incorporated by reference in the new environmental document to deal with regional influences, secondary effects, cumulative impacts, broad alternatives, and other factors that apply to the program as a whole, or (3) focus an EIR on a subsequent project to permit discussion solely of new effects which had not been considered before. (State CEQA Guidelines section 15168)

1.3.4 Analysis Methodology

A. Impact Assessment Assumptions. This program EIR evaluates the reasonably foreseeable environmental consequences of the Focused GPU (the Project), including residential development facilitated by the Housing Element Update by the year 2031, and identifies mitigation measures and alternatives that could avoid or reduce potentially significant adverse environmental impacts.[8] Based on the Town's RHNA and on recommendations by HCD to include additional sites as a buffer that would ensure the Town's sites inventory maintains sufficient capacity to accommodate the RHNA throughout the planning period, the Town has identified Housing Opportunity Sites with a development capacity of 605 housing units, which includes (1) the 554 units to meet the RHNA, and (2) a HCD-recommended buffer of 51 units to ensure an adequate number of sites.

The proposed Housing Opportunity Sites presented in the Draft 2023 – 2031 Housing Element Update were drawn from a larger list of vacant sites as described in Section 8 of the Draft Housing Element. Although this is a Program EIR and is focused on evaluating the environmental impacts of the entire program, the Housing Element identifies specific sites suitable for subdivision (Approach 4) and for rezoning to multi-family uses (Approach 5). Because specific sites have been identified for development with a specific number of housing units, the EIR also provides environmental information about development of the Housing Opportunity Sites in Approaches 4 and 5 to allow for informed consideration of the potential impacts of implementing the proposed Project.

Where the EIR determines that a particular impact cannot be mitigated to a less-than-significant level, the EIR identifies that impact as "significant and unavoidable." EIR Chapter 6, CEQA Mandated Analysis, includes a list of all significant unavoidable project impacts of the Project. Identified significant impacts that are not listed in Chapter 6 as unavoidable can be mitigated to a less-than-significant level by implementation of the mitigation measure(s) identified in this EIR. The individual environmental topic chapters provide more detail.

State CEQA Guidelines Section 15130 requires that an EIR consider and discuss the cumulative impacts of a project when the project's incremental effect is cumulatively considerable. A cumulative impact is the result of the combination of the impacts resulting from the project together with other projects causing related impacts (section 15130). The cumulative impacts of each environmental topic are included at the end of the impact discussion in each chapter. In the case of vehicle miles traveled, greenhouse gas emissions, and utilities (water demand and wastewater generation), impact analyses and conclusions are, by definition, cumulative because a Project impact would affect physical environmental conditions beyond the town.

[8] CEQA Guidelines section 15149(b).

The EIR terms used above ("significant," "unavoidable," "mitigation," “cumulative”) and other key CEQA terminology used in this EIR are defined in Table 1.4-1.

1.4 Scoping and Public Review

Public outreach for the EIR included public noticing, issuance of a Notice of Preparation (NOP) for an Environmental Impact Report, and conducting a public scoping meeting for the EIR, as summarized below. Comments received during the public scoping meeting were taken into consideration during the preparation of this Draft EIR. See Appendix A for the NOP and comment letters received.

1.4.1 Notice of Preparation of an EIR

The NOP was prepared and circulated to local, state, and federal agencies and made available to the public on June 9, 2023 (SCH #2023060305). The NOP contained a summary of the Project and resource areas that would be covered in the EIR, and how to submit comments. Circulation of the NOP consisted of its filing with the San Mateo County Clerk’s Office, sending out emails to people on Town email lists, posting signs in front of Hillsborough Town Hall 1600 Floribunda Avenue, 330 Ascot Drive (Fire Station 32), and 835 Chateau Drive (Fire Station 33). The NOP was also provided to the Governor’s Office of Planning and Research State Clearinghouse for distribution to various State Agencies for review.

Copies of the NOP were made available electronically via a web link on the Town’s website. The Town provided for a 30-day public review period that ended on July 10, 2023. Written comments in response to the NOP were received from two agencies: the Department of Transportation (Caltrans), and the Native American Heritage Commission. The NOP, summary of comments received at the scoping meeting (see following section), and the written comments received on the NOP are included in Appendix A of this document.

1.4.2 Public Scoping Meeting

The Town held a public scoping meeting (in-person and virtual) on June 21, 2023, before the Town of Hillsborough City Council. Oral comments were received from three interested individuals and generally consisted of questions pertaining to the costs of development of the Tobin Clark site, including necessary infrastructure, and who would bear these costs; concerns about traffic congestion resulting from development of the Tobin Clark site; the inequity of housing unit distribution in the Town; opposition to adding more units to the Project; and the hope that if units were to be added to the Project, the issue would be brought back to the community.

Table 1.4-1: Definitions of Key EIR Terminology	
Significant Impact	"Significant effect on the environment" (significant impact) means 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 and 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."* (State CEQA Guidelines, section 15382)
Cumulative Impacts	"Cumulative impacts" are defined as *"two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts."* (State CEQA Guidelines, section 15355)
Significant Unavoidable Impact	"Significant unavoidable impact" is defined as a significant adverse environmental impact for which either no mitigation or only partial mitigation is feasible. If the project is to be approved without imposing an alternative design, the Lead Agency must include in the record of the project approval a written statement of the specific reasons to support its action – i.e., a "statement of overriding considerations." (State CEQA Guidelines, sections 15126.2[c] and 15093[b])
Thresholds of Significance	The "thresholds of significance" used in this EIR to determine whether an impact is or is not *"*significant*"* are based on (a) CEQA-defined "mandatory findings of significance" – i.e., where any of the specific conditions occur under which the Legislature and the Secretary of Resources have determined constitute a potentially significant effect on the environment, which are listed in State CEQA Guidelines section 15065; (b) specific criteria that a Resources Agency has determined are "normally" considered to constitute a "significant effect on the environment"; (c) the relationship of the project effect to the adopted policies, ordinances, and standards of the Lead Agency and of responsible agencies; and/or (d) commonly accepted practice and the professional judgment of the EIR authors and Lead Agency staff.
Mitigation Measure	For each significant impact, the EIR must identify a specific "mitigation" measure or set of measures capable of *"(a) avoiding the impact altogether by not taking a certain action or parts of an action; (b) minimizing impacts by limiting the degree or magnitude of the action and its implementation; (c) rectifying the impact by repairing, rehabilitating, or restoring the impacted environment; (d) reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; or (e) compensating for the impact by replacing or providing substitute resources or environments, including through permanent protection of such resources in the form of conservation easements."* (State CEQA Guidelines, section 15370)
Source: MIG, 2022.	

1.5 Areas of Known Controversy

Pursuant to Section 15123(b)(2) of the state CEQA Guidelines, an EIR shall identify areas of controversy known to the lead agency including potential issues raised by agencies and the public. The Town has implemented a public outreach program during the development of the housing element. The outreach program consisted of virtual and in-person engagement, including online community-wide questionnaires and meetings, virtual and in-person open houses, a City Council study session, Housing Element Advisory Committee meetings, an Architecture and Design Review Board (ADRB) meeting, Citizen Communications Advisory Committee meetings, an online visioning workshop, and one-on-one meetings with potential housing opportunity site property owners. Areas of controversy raised during this process included:

- increased density and overcrowded ("urban") lots;
- confusion regarding lot splitting;
- concern that developers will destroy the single-family residence character of the community by dividing current minimum lots and constructing two large new homes;
- changes to look and feel of the Town (loss of privacy, hillside character, etc.);
- concerns regarding preserving the Town's open space;
- complicated permitting process;
- lack of incentives to build ADUs (need for streamlined permits/inspections and fee waivers);
- code constraints (such as those related to slopes, minimum house size, setbacks, etc.);
- need to allow tree removal on wooded parts of lots;
- impacts of zoning changes in high fire hazard severity zones and development in Very High Fire Hazard Severity Zones (VHFHSZ);
- increased traffic, congestion;
- tax increases for road maintenance;
- police and fire protection for increased population and cost of services;
- parking for new housing (including parking strips or allowing for on-property parking to avoid on-street parking);
- need for mass transit connections/infrastructure (such as EV shuttles running to/from El Camino Real and BART/Caltrain stops); and
- increased student demand for schools and maintaining quality schools.

1.6 Draft EIR Public Review and Comment Period

Publication of this Draft EIR will mark the beginning of a 45-day public review and comment period. During this period, the Draft EIR will be made available to local, state, and federal agencies, and to interested organizations and individuals for review. Notice of this Draft EIR will be sent directly to every agency, person, and organization that commented on the NOP. Written comments concerning the environmental review contained in this Draft EIR during the 45-day public review period should be sent to:

Liz Ruess, Planning Manager
Town of Hillsborough
Department of Building & Planning
1600 Floribunda Avenue
Hillsborough, CA 94010
LRuess@HILLSBOROUGH.NET

1.6.1 Availability of EIR Materials

All materials related to the preparation of this Program EIR, including information incorporated by reference, are available for public review. The Notice of Preparation and the Draft Program EIR are posted on the Town's website: https://www.hillsborough.net/553/2023-2031-Housing-Element-Update.

To request an appointment to review these materials, please contact Liz Ruess (see contact information above).

1.7 Final EIR/Responses to Comments

Following the conclusion of the 45-day public review period, the Town of Hillsborough will prepare a Final EIR in conformance with CEQA Guidelines Section 15132. The Final EIR will consist of:

- Revisions to the Draft EIR (DEIR) text, as necessary resulting from comments received;
- List of individuals and agencies commenting on the DEIR;
- Responses to comments received on the DEIR, in accordance with CEQA Guidelines (Section 15088); and
- Copies of letters received on the DEIR.

Section 15091(a) of the CEQA Guidelines stipulates that no public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings. If the lead agency approves a project despite it resulting in significant adverse environmental impacts that cannot be mitigated to a less than significant level, the agency must state the reasons for its action in writing. This Statement of Overriding Considerations must be included in the record of project approval.

1.8 Notice of Determination

If the Project is approved, the Town of Hillsborough will file a Notice of Determination (NOD), which will be available for public inspection and posted within 24 hours of receipt at the County Clerk's Office for 30 days, as well as the State Clearinghouse. The filing of the NOD starts a 30-day statute of limitations on court challenges to the approval under CEQA (CEQA Guidelines Section 15094(g).

1.9 Mitigation and Monitoring Report

In compliance with Public Resources Code Section 21081.6(a)(1), a mitigation monitoring reporting program (MMRP) will be prepared as a separate document that will be adopted in conjunction with the certification of the Final EIR. The MMRP, responses to public comments on the Draft EIR, and any revisions to the Draft EIR will be included in the Final EIR.

1.10 Organization of the Draft Program EIR

The Draft Program EIR (DEIR or Draft EIR) contains the primary analysis of potential environmental impacts discussed in the following seven sections described below:

Chapter 1.0 Introduction.

Chapter 2.0 Executive Summary: A brief discussion of the Project and summary of Project impacts, mitigation measures and alternatives.

Chapter 3.0 Project Description: Provides detailed description of the proposed Project and the Environmental Setting/Existing Conditions and Project objectives.

Chapter 4.0 Environmental Impact Analysis: Evaluates Project impacts and identifies mitigation measures designed to reduce significant impacts, where applicable. This Chapter includes 18 sections, each addressing different topical areas (Aesthetics, Air Quality, Biological Resources, Cultural Resources and Tribal Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise, Population and Housing, Public Services and Recreation, Transportation, Utilities and Service Systems, and Wildfire).

Chapter 5.0 Alternatives: Provides an analysis of the different alternatives to the proposed Project.

Chapter 6.0 CEQA Conclusions: Provides an analysis of growth-inducing impacts, significant unavoidable environmental impacts, and irreversible environmental change.

Chapter 7.0 Preparers: Provides a list of persons involved in the preparation of the Draft EIR.

The appendices include:

- Appendix A: Notice of Preparation (NOP), including comment letters received, the NOP distribution list, and oral comments from the public scoping meeting
- Appendix B: Draft 2023 – 2031 Housing Element Update Policies and Actions
- Appendix C: Air Quality, Energy, and Greenhouse Gas Analysis Technical Appendices
- Appendix D: Biology CNDDB Search Results and WRA Biological Survey
- Appendix E: Noise Analysis Technical Appendices

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CHAPTER 2 EXECUTIVE SUMMARY

This Chapter summarizes the findings of this Draft EIR. It provides a summary of the Project; environmental issues and areas of controversy; a table listing of the Project's impacts, mitigation, and level of significance after mitigation; and a summary of feasible alternatives to the project, including identification of the environmentally superior alternative.

Project Location

The Town of Hillsborough is located in the north-central part of San Mateo County on the San Francisco Peninsula. Hillsborough's town limit extends to the City of Burlingame to the north, the City of San Mateo to the east, and unincorporated areas of San Mateo County to the west and south. Regional access to the Town is provided via El Camino Real (SR 82) and Highway 101 to the east of the town, Junipero Serra Freeway (I-280) along the western border of the town, and Highway 92 to the south of the town limits (see Figure 3.2-1: Regional Location in Chapter 3, Project Description, of this EIR).[9]

The Town of Hillsborough is approximately 6.1 square miles, nearly all of which are developed with residential land uses. The Planning Area includes lands within the Town's corporate limits and lands within the Town's General Plan Planning Area (Sphere of Influence). The term "sphere of influence" applies to the area designated by the San Mateo County Local Agency Formation Commission (also known as LAFCO) as the probable, future physical boundary or service area of the Town (see Figure 3.2-2 Planning Area in Chapter 3, Project Description, of this EIR).

2.1 Project Description

Every city and county in California is required to have a general plan that functions as a comprehensive, long-range policy document. For cities, the general plan guides the physical development of the incorporated city (e.g., city limit) and any land outside city boundaries (e.g., unincorporated sphere of influence area) that has a relationship to the city's future growth and development. The Town of Hillsborough General Plan was adopted in 2005 and includes the Housing Element (last updated and adopted in 2014), Land Use Element, Circulation Element, Open Space and Conservation Element, Public Safety Element, and Noise Element.

The Town is proposing to make a comprehensive update to the 5th cycle Housing Element (2014 - 2022) with preparation of a 6th cycle 2023 – 2031 Housing Element and focused amendments to the Land Use Element and General Plan Land Use Map, Open Space and Conservation Element, and Public Safety Element for internal General Plan consistency to reflect the new Housing Element. Additionally, the Town will update Title 17 of the Municipal Code and Zoning Map and make other Municipal Code revisions to reflect and support the updated 6th cycle Housing Element (see Sections 3.3.3 through 3.3.6 in Chapter 3, Project Description, of this EIR). Together these actions constitute the proposed Project (also called the Focused General Plan Update (GPU)) described in this EIR.

[9] At this time, the Town does not seek to extend its Sphere of Influence boundary outside the Town limits.

The Town is preparing a comprehensive update to the Public Safety Element separately from this project, which will address climate change resiliency and wildfire planning as required by SB 379 and California Government Code (CGC) section 65302[g].[10]

The update solely addresses updating the Housing Element. All other changes to the Land Use, Open Space and Conservation, and Public Safety elements, Title 17 Municipal Code and Zoning Map, and other Municipal Code revisions are updated only to reflect and support the updated 6th cycle Housing Element (see Sections 3.3.3 through 3.3.6 in Chapter 3, Project Description, of this EIR).

2.1.1 Project Objectives

The proposed Project (Focused GPU) establishes the goals, policies, and programs that will provide Town staff and discretionary bodies with a foundation for decisions related to long-range planning for housing development within the town. The overarching goal of the program is to revise the adopted Housing Element to create a policy framework that meets the objectives listed below. For the purposes of this Program EIR, the Project objectives include the following:

Project Objectives

The Project includes the following objectives for the long-term growth and enhancement of the community:

1. Promote the preservation and improvement of existing housing and neighborhoods, and promote new housing growth to provide more affordable and market rate housing that meets the Town's Cycle 6 Regional Housing Needs Allocation (RHNA).

2. Meet housing needs by encouraging a variety of housing development affordable at all income levels, including construction of Accessory Dwelling Units (ADUs), multi-family housing on Town-owned land, subdivision/lot split opportunity sites, and other housing choices on vacant opportunity sites, private recreational sites, and institutionally owned sites.

3. Reduce, remove, and/or mitigate potential governmental constraints and barriers to housing development and promote equal housing opportunities for all people; incorporate best practices related to land use, racial equity, mobility, housing affordability, safety, environmental justice, community services, and healthy neighborhoods.

4. Affirmatively further fair housing, and take meaningful actions to overcome patterns of segregation, promote fair housing choice, eliminate disparities in opportunities, and foster inclusive communities free from discrimination.

[10] State General Plan Law requires a city or county (or city and county) that concurrently adopts or revises two or more general plan elements on or after January 1, 2018 to adopt or review the environmental justice element or the environmental justice goals, policies, and objectives in other elements if the city, county, or city and county has a disadvantaged community. The Town of Hillsborough does not have any SB 535-designated disadvantaged communities and therefore this requirement does not apply. CA Govt Code § 65302(h) (2023).

5. Provide adequate housing for all segments of the population, within the Town's constraints; promote and assist in the development of housing that meets the needs of special needs communities in Hillsborough while protecting the character of the Town.

6. Engage residents and stakeholders to generate ideas for potential Town-specific approaches to meet the Town's Cycle 6 RHNA, gain insight on the greatest challenges and opportunities that face Hillsborough, and ensure equitable and inclusive processes, policies, investments, and service systems.

7. Expand and update technology and innovative practices to create smart, sustainable communities, and adaptable infrastructure systems.

8. Protect lives and property from risks associated with wildfire-related emergencies; reduce the potential loss of life, injury, and property damage due to flooding, and seismic and geologic hazards.

2.1.2 Approach to EIR Analysis

Analysis provided in Chapter 6 indicates the Project would have no impact in the following environmental issue areas:

- Agricultural and Forestry Resources, and
- Mineral Resources

Therefore, these resources are not covered in detail in this Draft Program EIR.

The following environmental issues are analyzed in greater detail in this Draft Program EIR.

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources and Tribal Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services and Recreation
- Transportation
- Utilities and Service Systems
- Wildfire

The approach to the analysis presented in this EIR is programmatic in nature given the broad scope of the housing element updates. Each environmental issue is analyzed in a similar manner, starting with a discussion of the existing environmental setting, including physical

conditions and pertinent planning and regulatory framework. Thresholds of significance are then defined and are used to measure the proposed Project's potential impact to the environment. Thresholds of significance are based on a broad list of questions and impact topics set forth in Appendix G of the State CEQA Guidelines.

The impact analysis provided for each of the environmental issue areas examines the broad, long-term environmental effects resulting from implementation of the goals and policies contained in the Focused GPU. If the analysis indicates that a significant impact could occur, even with the benefits of any proposed goals or policies, mitigation measures are identified and imposed.

2.1.3 Summary of Significant Impacts and Mitigation Measures

For each of the environmental topics listed above, any "significant" Project or cumulative impact and associated mitigation measure(s) identified in this EIR are summarized in Table 2.1-1. The summary chart has been organized to correspond with the more detailed impact and mitigation discussions in chapters 4.1 through 4.16 of this Draft EIR. The chart is arranged in four columns: (1) identified impacts, (2) potential significance without mitigation, (3) mitigation measure(s), and (4) the level of impact significance after implementation of the mitigation measure(s). Because the table does not list impacts that are less than significant, and therefore do not require mitigation, the Impact/Mitigation Measure numbering may be out of sequence.

Table 2.1-1: Summary of Potentially Significant Impacts and Recommended Mitigation Measures			
Impacts	**Significance Before Mitigation**	**Mitigation Measures**	**Significance After Mitigation**
Aesthetics			
Impact AES-1: Existing Visual Character and Quality. The Town's existing design review requirements do not contain standards for multi-family residential buildings and the Town's Residential Design Guidelines do not provide guidance for the design of multi-family residential buildings. Development of the Tobin Clark Housing Opportunity Site could result in potentially significant visual impacts due to the construction of new multi-family residential buildings along a prominent, currently vacant ridgeline that provides scenic value.	**Potentially Significant**	**Mitigation Measure AES-1: Develop Objective Design Standards.** Prior to the issuance of building permit(s) for the Tobin Clark Opportunity Site, the Town shall: • Develop Objective Design Standards for multi-family residential buildings consistent with State law and amend the Zoning Ordinance and Planning Department application submittal checklist to require information and materials that accurately and sufficiently demonstrate a project's compliance with architectural façade and site and building design policies contained within the new Objective Design Standards. • Amend the Town's Residential Design Guidelines to be consistent with the multi-family residential Objective Design Standards. • Amend the Zoning Ordinance to include Objective Design Standards and transitional design standards for multi-family residential buildings adjacent to single-family homes, as appropriate. Standards may include height limitations, increased setbacks, landscaping requirements and density limitations. • Ensure that new development sensitively transitions to the character of adjacent structures and the immediate neighborhood. • Ensure residential structures are designed to be compatible with existing structures in the vicinity, minimize obstructing views from adjacent structures or views of community importance, and be consistent with the community design principles.	**Significant and Unavoidable** It is currently unknown if the new Objective Design Standards would be sufficient to fully mitigate the visual impacts of development on the Tobin Clark site to less than significant. Therefore, the aesthetics impact of the potential development of the Tobin Clark site, even with Mitigation Measure AES-1, would be ***significant and unavoidable***.

Table 2.1-1: Summary of Potentially Significant Impacts and Recommended Mitigation Measures			
Impacts	**Significance Before Mitigation**	**Mitigation Measures**	**Significance After Mitigation**
		• Include within the new Objective Design Standards architectural façade and site and building design requirements related to building massing strategies, downward facing and fully shielded lighting, window glass types to reduce sun glare off windows and interior lighting escaping the building at night, screening of garbage areas and roof-top utility systems, and landscaping and revegetation planning for adequate screening.	
Cumulative Aesthetics Impact Regarding Degrading Visual Character. Development of the Tobin Clark Housing Opportunity Site could result in potentially significant cumulative visual impacts due to the construction of new multi-family residential buildings along a prominent, currently vacant ridgeline that provides scenic value.	**Potentially Significant**	Implement **Mitigation Measure AES-1.**	**Significant and Unavoidable**
Air Quality			
Impact AIR-1: Conflict With or Obstruct Implementation of the Applicable Air Quality Plan. The proposed project would be inconsistent with one of the control measures (TR10: Land Use Strategies) identified in the 2017 Clean Air Plan related to VMT from land use planning.	**Potentially Significant**	**AIR-1: Reduce VMT.** Residential development projects occurring on sites identified in Housing Element programs shall be required to achieve a VMT significance threshold of 15 percent below the countywide average residential VMT per capita. This is generally considered the maximum feasible mitigation that can be achieved in suburban contexts, according to Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity, California Air Pollution Control Officers Association (CAPCOA), 2021 (CAPCOA report). For individual development projects that do not achieve VMT significance thresholds, applicants shall submit documentation that demonstrates how the	**Significant and Unavoidable Impact**

Table 2.1-1: Summary of Potentially Significant Impacts and Recommended Mitigation Measures			
Impacts	**Significance Before Mitigation**	**Mitigation Measures**	**Significance After Mitigation**
		necessary VMT reductions will be achieved. See Mitigation Measure TRANS-1.	
Impact AIR-2: Result in Substantial Pollutant Concentrations That Result in Community Health Risks and Hazards. Future residential development facilitated by the proposed Project may expose sensitive receptors near construction sites to Diesel Particulate Matter that could have an adverse health risk impact if project construction activities were of sufficient intensity and duration to result in prolonged exposure to DPM emissions. Additionally, residential development projects facilitated by the proposed Project may exceed BAAQMD project-level construction thresholds of significance.	**Potentially Significant**	**AIR-2a: Implement BAAQMD Basic Construction Mitigation Measures.** The Town shall require new residential development facilitated by the proposed Project to implement the BAAQMD's Basic Best Management Practices for construction-related fugitive dust emissions. These practices include: 1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day. 2. All haul trucks transporting soil, sand, or other loose material off-site shall be covered. 3. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited. 4. All vehicle speeds on unpaved roads shall be limited to 15 mph. 5. 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. 6. All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 miles per hour. 7. All trucks and equipment, including their tires, shall be washed off prior to leaving the site.	**Less than Significant Impact**

Table 2.1-1: Summary of Potentially Significant Impacts and Recommended Mitigation Measures			
Impacts	**Significance Before Mitigation**	**Mitigation Measures**	**Significance After Mitigation**
		8. Unpaved roads providing access to sites located 100 feet or further from a paved road shall be treated with a 6- to 12-inch compacted layer of wood chips, mulch, or gravel. 9. Publicly visible signs shall be posted with the telephone number and name of the person to contact at the Town 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.	
		Mitigation Measure AIR-2b: Prepare Project-level Construction Emissions Assessment. The Town shall require new residential development projects facilitated by the Housing Element Update to submit a project-level construction criteria air pollutant and toxic air contaminant emissions analysis as part of the project's application materials. The project-level construction emissions analysis shall be submitted and approved by the Town prior to the start of construction activities, demonstrating that project construction activities would not exceed BAAQMD project-level thresholds of significance. The Town shall require the project-level construction emissions analysis for both ministerial and discretionary projects. The project-level construction criteria air pollutant and toxic air contaminant emissions analysis may rely on BAAQMD construction screening criteria to demonstrate that a detailed assessment of criteria air pollutant and toxic air contaminant construction emissions is not required for the project. If the project does not satisfy all BAAQMD construction screening criteria, the analysis	**Less than Significant Impact**

Table 2.1-1: Summary of Potentially Significant Impacts and Recommended Mitigation Measures			
Impacts	**Significance Before Mitigation**	**Mitigation Measures**	**Significance After Mitigation**
		shall estimate and compare construction criteria air pollutant and toxic air contaminant emissions against the project-level thresholds of significance maintained by the Bay Area Air Quality Management District (BAAQMD) and, if emissions are shown to be above BAAQMD thresholds, implement measures to reduce emissions below BAAQMD thresholds. Mitigation measures to reduce emissions could include, but are not limited to: • Limiting the simultaneous occurrence of excavation, grading, and ground-disturbing construction activities; • Installing wind breaks (e.g., trees, fences) on the windward side(s) of actively disturbed areas of construction. Wind breaks should have at maximum 50 percent air porosity; • Planting vegetative ground cover (e.g., fast-germinating native grass seed) in disturbed areas as soon as possible and watered appropriately until vegetation is established; • Installing sandbags or other erosion control measures to prevent silt runoff to public roadways from sites with a slope greater than one percent; • Minimizing the amount of excavated material or waste materials stored at the site; • Hydroseeding or applying non-toxic soil stabilizers to construction areas, including previously graded areas, that are inactive for at least 10 calendar days; • Use of late engine model years, such as equipment meeting U.S. EPA / CARB certified Tier IV emission standards; and/or	

Table 2.1-1: Summary of Potentially Significant Impacts and Recommended Mitigation Measures			
Impacts	**Significance Before Mitigation**	**Mitigation Measures**	**Significance After Mitigation**
		• Other on- or off-site construction emission control measures deemed necessary to reduce construction emissions to levels below the BAAQMD's latest recommended CEQA thresholds.	
Cumulative Air Quality Impact. The Project would conflict with the 2017 Clean Air Plan and result in a cumulative significant and unavoidable impact to regional air quality (from O3 precursor emissions, PM2.5, and PM10) (Impact AIR-1).	**Potentially Significant**	Implement **Mitigation Measure AIR-1.**	**Significant and Unavoidable**
Biological Resources			
Impact BIO-1: Substantial Adverse Effect on Special-Status Species. Residential housing construction facilitated by the proposed Project could adversely impact special-status species.	**Potentially Significant**	**Mitigation Measure BIO-1: Project-Specific Biological Resources Evaluation.** Prior to the construction of new housing on sites that are on or adjacent to undeveloped land containing natural habitat (e.g., oak woodland, mixed woodland, and/or grassland) or aquatic habitat (i.e., from dripline of vegetation at top of creek bank), a project-specific biological resources evaluation shall be conducted by a qualified biologist. The biologist shall utilize relevant resources such as the California Natural Diversity Database (CNDDB) and the National Wetland Inventory (NWI) as well as a field survey covering the project site and adjacent areas. A biological resources report or memo shall be prepared documenting the results of the evaluation. At a minimum, the report or memo shall include a description of existing vegetation, habitats, and aquatic features on the project site; an evaluation of special-status species and sensitive habitats that could occur on the site; and suitable mitigation measures as needed to avoid project-related significant impacts to biological resources.	**Less than Significant Impact**

Table 2.1-1: Summary of Potentially Significant Impacts and Recommended Mitigation Measures			
Impacts	**Significance Before Mitigation**	**Mitigation Measures**	**Significance After Mitigation**
		Mitigation measures for impacts on special status species may include: • Best Management Practices (BMP's) such as erosion control devises (e.g., straw wattles, silt fence), • installation of temporary wildlife exclusion fencing along the limits of disturbance, • worker environmental awareness training on special status species and sensitive habitat including avoidance and minimization measures for the project, • preconstruction surveys and biological monitoring if sensitive species or an active nest / burrow is found, • minimizing the development footprint (e.g., clustered development) or avoiding sensitive biological resources, and • compensatory mitigation for impacts to special status species or their habitat such as habitat restoration, contributing to an established mitigation bank, incorporating a conservation easement on the property, or preserving suitable habitat in perpetuity off site. Mitigation measures from the biological resources' evaluation shall be incorporated into the CEQA document for the project and/or adopted as project conditions of approval. **Applies To:** New housing development on sites that are on or adjacent to natural vegetation or aquatic habitat (i.e., from the dripline of vegetation at the top of creek bank).	

Table 2.1-1: Summary of Potentially Significant Impacts and Recommended Mitigation Measures			
Impacts	**Significance Before Mitigation**	**Mitigation Measures**	**Significance After Mitigation**
Impact BIO-1: Substantial Adverse Effect on Special-Status Species - Nesting Birds. Residential housing construction facilitated by the proposed Project could adversely impact nesting birds protected by the Migratory Bird Treaty Act.	**Potentially Significant**	**Mitigation Measure BIO-2: Conduct Pre-Construction Nesting Bird Surveys.** To avoid impacts to nesting birds and avoid potential violation of state and federal laws pertaining to birds, all construction of new housing (including but not limited to mobilization and staging, clearing, grubbing, tree removal, fence installation, demolition, grading, and creation of fuel breaks) must occur outside the avian nesting season (that is, prior to February 1 or after September 15) If site disturbance (i.e., mobilization, ground and vegetation disturbance) occurs within the avian nesting season (from February 1 to September 15), all suitable habitats located within the project's area of disturbance including staging and storage areas plus a 250-foot (passerines) and 1,000-foot (raptor nests) buffer around these areas shall be thoroughly surveyed, for the presence of active nests by a qualified biologist no more than five days before commencement of any site disturbance activities and equipment mobilization. If project activities are delayed by more than five days, an additional nesting bird survey shall be performed. Active nesting is present if a bird is building a nest, sitting in a nest, a nest has eggs or chicks in it, or adults are observed carrying food to the nest. The results of the surveys shall be documented. If pre-construction nesting bird surveys result in the location of active nests, no site disturbance and mobilization of heavy equipment (including but not limited to equipment staging, fence installation, clearing, grubbing, vegetation removal, fence installation, demolition, and grading), shall take place within 250 feet of non-raptor nests and 1,000 feet of raptor nests, or as determined by a qualified biologist in consultation with the California Department of Fish and Wildlife, until the	**Less than Significant Impact**

Table 2.1-1: Summary of Potentially Significant Impacts and Recommended Mitigation Measures			
Impacts	**Significance Before Mitigation**	**Mitigation Measures**	**Significance After Mitigation**
		chicks have fledged. Monitoring shall be required to ensure compliance with the Migratory Bird Treaty Act and relevant California Fish and Game Code requirements. Monitoring dates and findings shall be documented.	
Impact BIO-1: Substantial Adverse Effect on Special-Status Species - Roosting Bats. Residential housing construction facilitated by the proposed Project could adversely impact roosting bats protected by the protected by the California Fish and Game Code.	**Potentially Significant**	**Mitigation Measure BIO-3a: Bat Habitat Assessment.** Prior to removal of trees or structures for housing development, a qualified biologist shall conduct a bat habitat assessment of trees and structures to be removed, as well as within 50 feet of surrounding trees and structures, if accessible. The biologist shall search for large cavities and crevices in trees and structures that could support maternity roosts as well as habitat for special-status bat species. Signs of bats such as guano or the smell of bats shall also be noted. Results of the bat habitat assessment shall be documented. If no suitable roosting habitat or signs of bats are found, then no further action is required, and the project may proceed as planned. If suitable roosting habitat or signs of bats are found, then Mitigation Measure 3b shall be implemented. **Mitigation Measure BIO-3b.** Dusk Emergence Bat Survey: If suitable roosting habitat or signs of bats are found in trees or structures to be removed on a new housing site a qualified biologist shall conduct a dusk emergence survey for roosting bats within 14 days prior to the removal of the tree(s) or structure(s). The biologist shall monitor all suitable roosting trees and structures at dusk for emerging bats, using acoustic equipment to identify the species. Results of the survey shall be documented. If no roosting bats are found during the survey, then no further action is required, and the project may proceed as planned.	**Less than Significant Impact**

Table 2.1-1: Summary of Potentially Significant Impacts and Recommended Mitigation Measures			
Impacts	**Significance Before Mitigation**	**Mitigation Measures**	**Significance After Mitigation**
		If roosting bats are found during the survey, a disturbance-free buffer zone shall be established around the roost site during the maternity season (April 15-September 15), as determined by a qualified biologist until the maternity season is over. Outside the maternity season, roosting bats may be excluded from the tree(s) or structure(s) prior to their removal as directed by a qualified biologist. During this period, exclusion shall only occur between September 15 and October 15, during warm (i.e., evening temperatures > 50° F) and dry weather when bats are active. The exact materials and methods for exclusion will depend on the type of roost (e.g., crevice, open building) but may include use of one-way doors or two-step tree removal process (removal of tree parts containing non-roost features on day 1 and full removal of the tree on day 2). If one-way doors are used, they shall be left in place for a minimum of 7 days or as long as necessary to allow all bats to exit the roost before sealing or removal of the tree/structure. The exact materials and methods of exclusion shall be determined by a qualified biologist who has knowledge of bat biology and behavior, and prior experience with bat habitat assessments, mitigation, and exclusion. If a maternity colony of a special-status bat species or non-special-status bat species is found during the maternity season, the roosting site shall be preserved, and a disturbance-free buffer shall be maintained around the roost. Disturbance-free buffers for bat maternity colonies of special-status and non-special-status bats may range from 50 feet to 300 feet. The disturbance-free buffer distance will be dependent on the type of disturbance and the species of bat present. Disturbance-free buffers shall be periodically monitored by a qualified biologist to ensure that such buffers are adequately protecting	

Table 2.1-1: Summary of Potentially Significant Impacts and Recommended Mitigation Measures			
Impacts	**Significance Before Mitigation**	**Mitigation Measures**	**Significance After Mitigation**
		maternity colonies. Following the maternity season, any bats remaining in the roost may be excluded following the procedures described above. Once all bats have been excluded from the roost site, the roost may be removed. **Applies To:** Any housing project that requires removal of trees or structures that may affect special status species.	
Impact BIO-2: Impacts on Riparian Habitat and other Sensitive Natural Communities. Residential development facilitated by the proposed Project could adversely impact riparian habitat and sensitive natural communities.	**Potentially Significant**	**Mitigation Measure BIO-4: Stream Protection Ordinance.** The Town of Hillsborough shall codify General Plan Policy OSC 3.1 that protects streams to assure protection is provided uniformly to streams and creeks, regardless of the type of housing application. The Town shall adopt an Ordinance implementing the requirements of General Plan policy OSC 3.1, ensuring it applies to all residential development projects uniformly and shall include amendments to the zoning ordinance (Development Code) that would establish setbacks which range from 20 feet (General Plan policy OSC 3.1) to 100 feet or more upland from the top of stream banks depending on the size of the lot, slope, nature and quality of riparian and stream resources, and species present, the standards for development within the setbacks, and review procedures and permit requirements. Setback requirements in areas where special-status species associated with the stream and surrounding habitat should ensure the long-term protection of those species and their habitats. Construction of main or accessory structures, earthmoving activity, land clearing, or agricultural uses shall be set back 50 feet from delineated wetland boundaries. The setback shall be 100 feet or more in areas with slopes greater than 50% unless additional	**Less than Significant Impact**

Table 2.1-1: Summary of Potentially Significant Impacts and Recommended Mitigation Measures			
Impacts	**Significance Before Mitigation**	**Mitigation Measures**	**Significance After Mitigation**
		measures are installed to protect the stream from erosion. This measure will further minimize impacts to steams by providing a greater distance to reduce runoff, erosion, and sediment from entering the creek. In limited circumstances, the setback may be reduced or increased if recommended by a qualified biologist and approved by the Town.	
Impact BIO-3: Substantial Adverse Effect on Wetlands. Residential development facilitated by the proposed Project could adversely impact wetlands.	**Potentially Significant**	Implement **Mitigation Measure BIO-1 and Mitigation Measure BIO-4.**	**Less than Significant Impact**
Impact BIO-4: Interfere Substantially with Wildlife Movement Corridors and Wildlife Nursery Sites. Residential development facilitated by the proposed Project could interfere with the movement of wildlife or could impair or destroy breeding sites.	**Potentially Significant**	Implement **Mitigation Measure BIO-1 and Mitigation Measure BIO-4.**	**Less than Significant Impact**
Impact BIO-5: Conflicts with Local Policies or Ordinances Protecting Biological Resources. Residential development facilitated by the Draft 2023 – 2031 Housing Element could conflict with adopted plans, policies and ordinances protecting biological resources if future residential projects impact sensitive biological resources.	**Potentially Significant**	Implementation of Mitigation Measures BIO-1 through BIO-4 would reduce potential impacts to ***less than significant with mitigation***.	**Less than Significant Impact**
Cumulative Biological Resources Impact. Future residential development facilitated by the Project, in conjunction with other types of private development and public projects occurring in the Town, could potentially result in cumulative impacts to biological resources (special-status species and their habitats, sensitive natural communities, wetlands,	**Potentially Significant**	Implement **Mitigation Measures BIO-1 through BIO-4**.	**Less than Significant Impact**

Table 2.1-1: Summary of Potentially Significant Impacts and Recommended Mitigation Measures			
Impacts	**Significance Before Mitigation**	**Mitigation Measures**	**Significance After Mitigation**
wildlife movement corridors, and wildlife nursery sites).			
Cultural Resources and Tribal Cultural Resources			
Impact CUL-1: Destruction/Degradation of Historical Resources. Future development projects that may be facilitated by the Project may cause substantial adverse changes in the significance of a historic resource, including properties or features eligible for listing in a local, State, or federal register of historic resources.	**Potentially Significant**	**Mitigation Measure CUL-1: Prepare Historic Resource Evaluation.** For any individual development project within the Planning Area that the Town determines may involve a property that contains a potentially significant historic resource, the resource shall be assessed by a professional who meets the Secretary of the Interior's Professional Qualifications Standards to determine whether the property is a significant historic resource and whether or not the project may have a potentially significant adverse effect on the historic resource. If, based on the recommendation of the qualified professional, the Town determines that the project may have a potentially significant effect, the Town shall require the applicant to implement the following mitigation measures: (a) Adhere to at least one of the following Secretary of the Interior's Standards: • Secretary of Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings; or Secretary of Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings. The qualified professional shall make a recommendation to the Town as to whether the project fully adheres to the Secretary of the Interior's Standards, and any specific modifications necessary to do so. The final	**Significant and Unavoidable**

Table 2.1-1: Summary of Potentially Significant Impacts and Recommended Mitigation Measures			
Impacts	**Significance Before Mitigation**	**Mitigation Measures**	**Significance After Mitigation**
		determination as to a project's adherence to the Standards shall be made by the Town body with final decision-making authority over the project. Such a determination of individual project adherence to the Secretary of the Interior's Standards will constitute mitigation of the project historic resource impacts to a less-than-significant level (CEQA Guidelines section 15064.5). (b) If measure (a) is not feasible, the historic resource shall be moved to a new location compatible with the original character and use of the historic resource, and its historic features and compatibility in orientation, setting, and general environment shall be retained, such that a substantial adverse change in the significance of the historic resource is avoided. Implementation of measure (b) would reduce the impact to a less-than-significant level. If neither measure (a) nor measure (b) is feasible, then the Town shall, as applicable and to the extent feasible, implement the following measures in the following order: (c) Document the historic resource before any changes that would cause a loss of integrity and loss of continued eligibility. The documentation shall adhere to the Secretary of the Interior's Standards for Architectural and Engineering Documentation. The level of documentation shall be proportionate to the level of significance of the resource. The documentation shall be made available for inclusion in the Historic American Building Survey (HABS) or the Historic American Engineering Record	

Table 2.1-1: Summary of Potentially Significant Impacts and Recommended Mitigation Measures			
Impacts	**Significance Before Mitigation**	**Mitigation Measures**	**Significance After Mitigation**
		(HAER) Collections in the Library of Congress, and the California Historical Resources Information System (CHRIS), as well as local libraries and historical societies. (d) Retain and reuse the historic resource to the maximum feasible extent and continue to apply the Secretary of the Interior's Standards to the maximum feasible extent in all alterations, additions, and new construction. (e) Through careful methods of planned deconstruction to avoid damage and loss, salvage character-defining features and materials for educational and interpretive use on-site, or for reuse in new construction on the site in a way that commemorates their original use and significance. (f) Interpret the historical significance of the resource through a permanent exhibit or program in a publicly accessible location on the site or elsewhere within the Planning Area.	
Impact CUL-2: Potential Disturbance of Human Remains. Construction activities, particularly excavation for building foundations, trenching for utilities, and development of roadways, associated with residential development projects facilitated by the Project may disturb human remains during construction.	**Potentially Significant**	**Mitigation Measure CUL-2: Procedures if Human Remains are Encountered**. For future development of individual projects within the Planning Area, if human remains are encountered during ground-disturbing activities within specific project sites, the project contractor and/or on-site supervisor shall provide certification to the Town Planning Division that work within 50 feet of the discovery is stopped. The project contractor shall immediately notify the San Mateo County Coroner (Coroner) upon the discovery of any	**Less than Significant Impact**

Table 2.1-1: Summary of Potentially Significant Impacts and Recommended Mitigation Measures			
Impacts	**Significance Before Mitigation**	**Mitigation Measures**	**Significance After Mitigation**
		human remains. At the same time, a qualified archaeologist meeting federal criteria under 36 CFR 61 shall be contacted by the project applicant(s) and project contractor, in coordination with the Town Planning Division, to assess the situation and consult with the appropriate agencies. If the human remains are of Native American origin, the Coroner shall notify the NAHC within 24 hours of this identification. The NAHC will identify a Most Likely Descendant (MLD) to inspect the site and provide recommendations for the proper treatment or disposition, with proper dignity, of the remains and any associated grave goods. Upon completion of the assessment, the qualified archaeologist shall prepare a report documenting the background to the finds and provide recommendations for the treatment of the human remains and any associated cultural materials, as appropriate and in coordination with the recommendations of the MLD. The report shall be submitted to the project applicant, the Town Planning Division, and the NWIC. Once the report is reviewed and approved by the Town Planning Division, and any appropriate treatment completed, project construction activity within the area of the find may resume. If the MLD does not make recommendations within 48 hours the project applicant(s) shall reinter the remains in an area of the property secure from further disturbance. If the project applicant(s) does not accept the MLD's recommendations, the applicant(s) or the MLD may request mediation by the NAHC.	
Energy			
Impact ENG-1: Wasteful, Inefficient, or Unnecessary Consumption of Energy	**Potentially Significant**	**Mitigation Measure ENG-1a: Residential Electric Vehicle Charging Requirements.** Future residential	**Less than Significant Impact**

Table 2.1-1: Summary of Potentially Significant Impacts and Recommended Mitigation Measures			
Impacts	**Significance Before Mitigation**	**Mitigation Measures**	**Significance After Mitigation**
Resources. The proposed Project would result in the use of gasoline and diesel fuels for new vehicle trips, which is considered an inefficient form of energy.		development facilitated by the Project that includes new or additional parking facilities must conform with the Tier 2 electric vehicle charging requirements in the latest edition of the California Green Building Standards Code (CalGreen) in effect at the time that building permit applications are submitted to the Town. Currently, the 2022 CalGreen code, Section A4.106.8, Electric Vehicle Charging for New Construction, requires the following measures to facilitate the future installation and use of electric vehicle chargers: • New one and two-family dwellings and townhouses with attached private garages include a dedicated 208/240-volt branch circuit rated at 40 amperes minimum. • New multi-family dwellings provide 40 percent of the total number of parking spaces on a building site be electric vehicle charging spaces capable of supporting future electric vehicle supply equipment.	
	Potentially Significant	**Mitigation Measure ENG-1b: VMT Reduction.** Future residential development facilitated by the Project shall be required to achieve a VMT reduction of 15 percent below the countywide average residential VMT per capita. For individual development projects that do not achieve VMT significance thresholds, applicants shall submit documentation that demonstrates how the necessary VMT reductions will be achieved (see Mitigation Measure TRANS-1).	**Less than Significant Impact**
Geology and Soils			
Impact GEO-1: Substantial Adverse Effects from Seismic and Slope Instability Hazard. The implementation of Action 1.1 (b) of the	**Potentially Significant**	**Mitigation Measure GEO-1: Conduct Geotechnical Analysis.** Prior to adoption of any changes to Hillsborough Municipal Code Title 16 (Subdivisions)	**Less than Significant Impact**

Table 2.1-1: Summary of Potentially Significant Impacts and Recommended Mitigation Measures			
Impacts	**Significance Before Mitigation**	**Mitigation Measures**	**Significance After Mitigation**
Draft 2023-2031 Housing Element Housing Plan could facilitate more intensive housing development than what is currently permitted on hillside lots in the Planning Area. More intensive hillside development, if not properly studied for potential ground instability impacts, including those influenced by climate change impacts, could adversely affect future subdivision residents, surrounding residents, and the environment by causing or contributing to landslides, debris flows, and other forms of ground instability.		made as a result of implementation of Housing Element Action 1.1 (b), the Town shall include within the modifications to Municipal Code Title 16 the following requirements: • The Town shall develop and incorporate into Municipal Code Title 16 Stability Report requirements for all new proposed hillside subdivisions. • The soils/geotechnical report required for a new hillside subdivision must evaluate the risks of more intensive housing development on steep and potentially unstable slopes due to increased landslide, debris flows, and post-fire debris flow hazards resulting from climate change impacts. A site-specific geotechnical report must also be prepared for the development of each lot created by a hillside subdivision. Lot-specific geotechnical reports must also analyze site-specific impacts related to landslide, debris flows, and post-fire debris flows, including the potential for the development of the lot to exacerbate ground instability impacts. Further, it must be demonstrated that new hillside subdivision lots would meet the Town's Stability Report requirements. • New subdivisions in landslide areas and on landslide-prone deposits on steep slopes where it cannot be demonstrated through the required geotechnical report that appropriate mitigation measures can stabilize the site for construction will be prohibited. • Any work or construction undertaken to correct slope instability or mitigate other geologic hazard	

Table 2.1-1: Summary of Potentially Significant Impacts and Recommended Mitigation Measures			
Impacts	**Significance Before Mitigation**	**Mitigation Measures**	**Significance After Mitigation**
		conditions to be supervised and certified by a geotechnical engineer and/or an engineering geologist. • If after completion of the required feasibility analysis of the modifications to the Town's hillside development standards, the Town determines implementation of Action 1.1 (b) would increase geologic and seismic hazards, the Town will use the results of the feasibility analysis to determine if additional measures beyond the requirements listed above are needed to minimize or avoid said geologic or seismic hazards.	
Impact GEO-2: Potential for Disturbance of Paleontological Resources. Construction activities associated with residential development that may be facilitated by the Project could disturb paleontological resources.	**Potentially Significant**	**Mitigation Measure GEO-2: Procedures for Protection of Paleontological Resources.** For future residential development facilitated by the Draft 2023 – 2031 Housing Element, the following measures shall be implemented: (1) Construction Personnel Training. For residential housing projects involving deep excavation activities that are ten feet or greater in depth, the project applicant/designated representative shall organize construction personnel training for all excavation-related construction activities. The training shall be conducted by a qualified paleontologist who meets the Secretary of the Interior's Professional Qualifications Standards. The construction training shall be provided prior to the start of construction. The qualified paleontologist shall provide documentation of the training to the Town.	**Less than Significant Impact**

Table 2.1-1: Summary of Potentially Significant Impacts and Recommended Mitigation Measures			
Impacts	**Significance Before Mitigation**	**Mitigation Measures**	**Significance After Mitigation**
		(2) Procedures for Resources Encountered. For all residential housing projects in the Planning Area, if subsurface paleontological resources are encountered, excavation shall halt within a buffer area of at least 50 feet around the find. Construction activities will not be allowed to continue within the 50-foot buffer area until a paleontologist who meets the Secretary of the Interior's Professional Qualifications Standards evaluates the significance of the resource and its stratigraphic context in light of professional paleontological standards. Work can resume within the 50-foot buffer area at the discretion of the project paleontologist. Work shall be allowed to continue outside the buffer area; however, the paleontologist shall be empowered to temporarily halt or redirect construction activities if additional paleontological resources are found. If the project paleontologist identifies significant paleontological resources, the paleontologist shall prepare a treatment and recovery plan for the identified resources. If treatment and salvage is required, recommendations shall be consistent with Society of Vertebrate Paleontology guidelines and current professional standards. The project paleontologist shall provide the collected materials to an appropriate museum repository for paleontological specimens for permanent curatorship and storage. The project paleontologist shall also prepare a report documenting the results of treatment and recovery activities and the significance of the	

Table 2.1-1: Summary of Potentially Significant Impacts and Recommended Mitigation Measures			
Impacts	**Significance Before Mitigation**	**Mitigation Measures**	**Significance After Mitigation**
		fossils and submit the report to the Town. The report, when submitted to the Town, shall signify the completion of the program to mitigate impacts on paleontological resources.	
Greenhouse Gas Emissions			
Impact GHG-1: Generate GHG Emissions That May Have a Significant Impact on the Environment, and Would Conflict With an Applicable Plan, Policy, or Regulation Adopted for the Purposes of Reducing GHG Emissions. Future residential development facilitated by the Project would generate GHG emissions that would have the potential to conflict with state-wide GHG reduction goals, including the State's goal for becoming carbon neutral by 2045. The growth facilitated by adoption of the Housing Element Update would also result in GHG emissions that would conflict with the CARB 2022 Scoping Plan and MTC/ABAG Plan Bay Area 2050. The GHG emissions that could be generated by the increase in housing facilitated by the project would not be consistent with BAAMD-recommended CEQA thresholds of significance and the CARB Scoping Plan, even with the inclusion of feasible mitigation measures.	**Potentially Significant**	**Mitigation Measure GHG-1a: Update Climate Action Plan.** Within two years of adoption of the Project, the Town shall prepare an updated Climate Action Plan that: 1. Quantifies greenhouse gas emissions, both existing and proposed, over a specified time period. The time period forecasted shall be no less than the Year 2045. Additional, forecasted years (e.g., 2030, 2035, etc.) may be included. The existing greenhouse gas emission inventory shall include an evaluation of the Town's Natural and Working Lands. 2. Identifies annual, community-wide greenhouse gas emission reduction targets (i.e., in MTCO2e) and/or efficiency targets (i.e., in MTCO2e per service population and/or capita) that align the Town's emissions with legislatively adopted State-wide greenhouse gas reduction targets (e.g., SB 32) for 2030 and goal of being carbon neutral by 2045, consistent with Executive Order B-55-18. 3. Specifies measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented, would collectively achieve the specified annual, community-wide greenhouse gas emission reduction targets and/or efficiency targets. The Town's strategy shall include strategies that	**Significant and Unavoidable Impact**

Table 2.1-1: Summary of Potentially Significant Impacts and Recommended Mitigation Measures			
Impacts	**Significance Before Mitigation**	**Mitigation Measures**	**Significance After Mitigation**
		address the carbon sources and sinks associated with the Town's Natural and Working Lands. 4. Establishes a mechanism to monitor the plan's progress toward achieving its community-wide greenhouse gas emission reduction targets and/or efficiency targets, and require an amendment if the Climate Action Plan is not achieving specified levels.	
	Potentially Significant	**Mitigation Measure GHG-1b: Consider Adoption of a Zero Net Energy Ordinance.** Within one year of the adoption of the Focused GPU the Town shall complete an evaluation on the feasibility of adopting an ordinance that amends the Town's Municipal Code to require all new residential development subject to Title 24, Part 6 of the California Building Code to achieve Zero Net Energy (ZNE) standards. If the Town finds ZNE technology, programs, and/or other strategies are feasible and cost-effective, the Town shall adopt a ZNE ordinance as expeditiously as possible given Town resources. As defined by the California Energy Commission (CEC), ZNE standards require the value of the net energy produced by project renewable energy resources to equal the value of the energy consumed annually by the project, using the CEC's Time Dependent Valuation. In the event the Town adopts a ZNE ordinance, Mitigation Measure GHG-1c would no longer apply to housing site projects in the Town. This Mitigation Measure may no longer apply if, after adoption of an updated qualified Climate Action Plan as required by Mitigation Measure GHG-1a, a ZNE ordinance is found to be unnecessary for the Town to align its GHG emissions with future statewide	**Significant and Unavoidable Impact**

Table 2.1-1: Summary of Potentially Significant Impacts and Recommended Mitigation Measures			
Impacts	**Significance Before Mitigation**	**Mitigation Measures**	**Significance After Mitigation**
		greenhouse gas emissions goals, including being carbon neutral by 2045.	
	Potentially Significant	**Mitigation Measure GHG-1c: Prohibit Natural Gas Plumbing and Appliances in New Housing Sites.** The Town shall prohibit natural gas plumbing and the use of all natural gas appliances such as cook tops, water heaters, and space heaters in all new housing site developments, with the following exceptions: • Newly constructed buildings with a valid planning entitlement or other development agreement approved prior to the date of certification of this EIR. • It can be demonstrated there is no commercially available technology capable of meeting the specific appliance or building system application due to specific economic, technical, logistical, or other factors associated with the development site. Projects subject to the above exceptions shall provide the necessary infrastructure to support future electrification of appliances and building systems, consistent with the requirements identified in the Town of Hillsborough Municipal Code Chapter 15.10, as in effect September 6, 2023. This prohibition on natural gas plumbing and natural gas appliances shall cease if and when 1) the City adopts a ZNE ordinance per Mitigation Measure GHG-1b or 2) adopts an updated, qualified Climate Action Plan pursuant to Mitigation Measure GHG-1a and a natural gas prohibition on some or all appliances/uses is determined to be unnecessary for the purposes of aligning the Town's emissions with the state's long-term greenhouse gas emission reduction goals.	**Significant and Unavoidable Impact**

Table 2.1-1: Summary of Potentially Significant Impacts and Recommended Mitigation Measures			
Impacts	**Significance Before Mitigation**	**Mitigation Measures**	**Significance After Mitigation**
	Potentially Significant	**Mitigation Measure GHG-1d: Residential Electric Vehicle Charging Requirements.** Future residential development facilitated by the Project that includes new or additional parking facilities must conform with the Tier 2 electric vehicle charging requirements in the latest edition of the California Green Building Standards Code (CalGreen) in effect at the time the building permit application is submitted to the Town. Currently, the 2022 CalGreen code, Section A4.106.8, Electric Vehicle Charging for New Construction, require the following measures to facilitate the future installation and use of electric vehicle chargers: • New one and two-family dwellings and townhouses with attached private garages include a dedicated 208/240-volt branch circuit rated at 40 amperes minimum. • New multi-family dwellings provide 40 percent of the total number of parking spaces on a building site be electric vehicle charging spaces capable of supporting future electric vehicle supply equipment.	**Significant and Unavoidable Impact**
	Potentially Significant	**Mitigation Measure GHG-1e: VMT Reduction Requirements**. Future residential development facilitated by the Project shall be required to achieve a VMT significance threshold of 15 percent below the countywide average residential VMT per capita. For individual development projects that do not achieve VMT significance thresholds, applicants shall submit documentation that demonstrates how the necessary VMT reductions will be achieved.	**Significant and Unavoidable Impact**

Table 2.1-1: Summary of Potentially Significant Impacts and Recommended Mitigation Measures			
Impacts	**Significance Before Mitigation**	**Mitigation Measures**	**Significance After Mitigation**
Cumulative GHG Impacts. The proposed 2023 – 2031 Housing Element would result in GHG emissions that do not meet the State's 2030 GHG reduction or 2045 carbon neutrality goals. The implementation of the Draft 2023 – 2031Housing Element could also result in GHG emissions that conflict with plans adopted for the purposes of reducing GHG emission, including the 2022 Scoping Plan and Plan Bay Area 2050. Even with mitigation, this impact would be ***significant and unavoidable***.	**Potentially Significant**	Implement **Mitigation Measure GHG-1a – 1e.**	**Significant and Unavoidable Impact**
Hazards and Hazardous Materials			
Impact HAZ-1: Hazards Due to Reasonably Foreseeable Upset and Accident Conditions Involving Release of Hazardous Materials into the Environment. The Project could expose future residents to reasonably foreseeable upset and accident conditions associated with hazardous materials.	**Potentially Significant**	**Mitigation Measure HAZ-1: Amend General Plan Public Safety Element.** To protect the public and the environment from reasonably foreseeable upset and accident conditions associated with hazardous materials, adopt new Public Safety Policy PS-5.5 and new Public Safety Action PS-5.5, and amend the Municipal Code to establish development standards specified in proposed Action PS-5.5. *Policy PS-5.5: Mitigate hazard exposure to and from new development projects through the environmental review process, design criteria, and standards enforcement, including, where deemed necessary and based on the history of land use, requiring site assessment for hazardous and toxic soil contamination prior, including preparation of a Phase 1 Environmental Site Assessment (ESA) to approving development project applications.* *Action PS-5.5: Establish development standards for new development and redevelopment to identify and*	**Less than Significant Impact**

Table 2.1-1: Summary of Potentially Significant Impacts and Recommended Mitigation Measures			
Impacts	**Significance Before Mitigation**	**Mitigation Measures**	**Significance After Mitigation**
		abate hazardous material releases from prior land uses that have the potential to affect future property owners or users. A Phase I Environmental Site Assessment should be required where appropriate; a Phase II Environmental Site Assessment, with environmental testing and/or remediation, may also be required based on the findings of the Phase I Environmental Site Assessment.	
Hydrology and Water Quality			
Impact HYD-1: Risks from Pollutant Release due to Project Inundation. Development of the Draft 2023 – 2031 Housing Element Housing Opportunity Sites could have potentially significant flooding-related impacts, particularly considering the existing General Plan goals, policies, and actions to which the new housing development would be subject do not reflect recent State law requirements.	**Potentially Significant**	**Mitigation Measure HYD-1: Update General Plan Safety Element.** Prior to the issuance of building permit(s) for any of the Draft 2023-2031 Housing Element Housing Opportunity Sites, the Town shall develop and adopt Geneal Plan Public Safety Element goals, the Town shall develop and adopt Geneal Plan Public Safety Element goals, policies, and actions consistent with the requirements of Government Code §65302(g) and as addressed in OneShoreline's "Planning Policy Guidance to Protect and Enhance Bay Shoreline Areas of San Mateo County" that include the following: • Review and use the best available science and projections of future conditions to identify the areas that are vulnerable to inland flooding exacerbated by sea level rise, shallow groundwater rise, and extreme precipitation events. Use this information to continue to develop or adjust planning and adaptation strategies. • Integrate planning for future sea level rise, shallow groundwater rise, and extreme precipitation events and their potential effects on inland flooding into all relevant Town processes related to development,	**Significant and Unavoidable Impact**

Table 2.1-1: Summary of Potentially Significant Impacts and Recommended Mitigation Measures			
Impacts	**Significance Before Mitigation**	**Mitigation Measures**	**Significance After Mitigation**
		including zoning ordinance updates and entitlement of new and/or substantial construction. • Ensure that new and/or substantial construction is planned and designed to accommodate future conditions for the life of the development project.	
Cumulative Hydrology Impacts. The Project in combination with other, public and private development with the Town may make a cumulatively considerable contribution with respect to flooding and pollutant release.	**Potentially Significant**	Implement **Mitigation Measure HYD-1**.	**Significant and Unavoidable Impact**
Transportation			
Impact TRANS-1: Conflict or Be Inconsistent with CEQA Guidelines § 15064.3, Subdivision (b), Regarding Project VMT. The Project would generate VMT that, per capita is estimated to be 21.4 miles, which is 62 percent above the countywide threshold.	**Potentially Significant**	**Mitigation Measure TRANS-1: VMT Reduction.** Residential development projects occurring on sites identified in Draft 2023 – 2031 Housing Element programs shall be required to achieve a VMT significance threshold of 15 percent below the countywide average residential VMT per capita. This is generally considered the maximum feasible mitigation that can be achieved in suburban contexts, according to *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity*, California Air Pollution Control Officers Association (CAPCOA), 2021 (CAPCOA report). For individual development projects that do not achieve VMT significance thresholds, the Town shall develop a standard process where applicants shall submit documentation that demonstrates how the necessary VMT reductions will be achieved. **VMT Reduction Strategies** Project-specific VMT reduction strategies would be identified as part of specific project proposals, and the selected strategies will vary depending on the location of	**Significant and Unavoidable Impact**

Table 2.1-1: Summary of Potentially Significant Impacts and Recommended Mitigation Measures			
Impacts	**Significance Before Mitigation**	**Mitigation Measures**	**Significance After Mitigation**
		each development site and the availability of nearby transportation services. The CAPCOA report contains transportation-focused measures – including transportation demand management (TDM) strategies – for the purpose of reducing VMT, including VMT reduction estimates associated with each strategy. Following are TDM and other strategies that may be applied; additional measures beyond those provided in this list may be allowed if supported by evidence. • Subsidize transit passes; • Provide or participate in established ride-matching program(s); • Provide information, educational, and marketing resources for residents, employees, and visitors managed by a TDM Coordinator; • Construct off-site pedestrian and/or bicycle network improvements, particularly those that fill gaps and/or connect the project and surrounding neighborhood to transit; • Reduce parking supply at affordable or senior residential projects and projects that are well-served by transit; • Unbundle residential parking costs (sell or lease parking separately from the housing unit) where appropriate on-street management is present. As noted, the lack of availability of transit services in proximity to the Planning Area will impact the VMT reduction that can be achieved through some of these strategies. Therefore, projects located in proximity to the frequent bus service operating along El Camino Real and/or Caltrain would offer residents viable alternatives to vehicle transportation. However, programs administered through Commute.org are available to all	

Table 2.1-1: Summary of Potentially Significant Impacts and Recommended Mitigation Measures			
Impacts	**Significance Before Mitigation**	**Mitigation Measures**	**Significance After Mitigation**
		San Mateo County residents and include ridesharing, a guaranteed ride home program, and incentives to use non-vehicle transportation. Marketing efforts for these measures would support VMT reduction for residents of the proposed units as well as existing Hillsborough residents.	
Cumulative Transportation Impacts. The Existing plus Project VMT per capita is estimated to be 21.4 miles, which is 62 percent above the countywide threshold contributing to a cumulative VMT impacts. .	**Potentially Significant**	Implement **Mitigation Measure TRANS-1**.	**Significant and Unavoidable Impact**
Tribal Cultural Resources			
Impact TRIB-1: Discovery of Tribal Resources During Construction. Construction activities, particularly excavation for building foundations, trenching for utilities, and development of roadways, associated with residential development projects facilitated by the Project may disturb tribal cultural resources during construction.	**Potentially Significant**	**Mitigation Measure TRIB-1: Procedures for Discovery of Tribal Cultural Resources.** Upon discovery of any tribal cultural or archaeological resources, cease construction activities in the immediate vicinity of the find until the find can be assessed. All tribal cultural and archaeological resources unearthed by project construction activities shall be evaluated by the qualified archaeologist and tribal monitor/consultant. If the resources are Native American in origin, interested Tribes (as a result of correspondence with area Tribes) shall coordinate with the landowner regarding treatment and curation of these resources. Typically, the Tribe will request preservation in place or recovery for educational purposes. Work may continue on other parts of the project while evaluation takes place. • Preservation in place shall be the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavation to remove the resource along the	**Less Than Significant impact**

Table 2.1-1: Summary of Potentially Significant Impacts and Recommended Mitigation Measures			
Impacts	**Significance Before Mitigation**	**Mitigation Measures**	**Significance After Mitigation**
		subsequent laboratory processing and analysis. All tribal cultural resources shall be returned to the Tribe. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be offered to the Tribe or a local school or historical society in the area for educational purposes. • Archaeological and Native American monitoring and excavation during construction projects shall be consistent with current professional standards. All feasible care to avoid any unnecessary disturbance, physical modification, or separation of human remains and associated funerary objects shall be taken. Principal personnel shall meet the Secretary of the Interior standards for archaeology and have a minimum of 10 years' experience as a principal investigator working with Native American archaeological sites in Southern California. The Qualified Archaeologist shall ensure that all other personnel are appropriately trained and qualified.	
Utilities and Service Systems			
Impact UTS-1: Utility Service Pipelines. Construction of utility service pipelines (water, wastewater, storm drain) could impact sensitive biological resources.	**Potentially Significant**	**Mitigation Measure UTS-1: New Water, Wastewater, and Storm Drain Infrastructure for the Tobin Clark Site.** The Town shall work with the City of San Mateo, the College of San Mateo, and the future developer of the Tobin Clark site to obtain water supply and sanitary	**Less than Significant Impact**

Table 2.1-1: Summary of Potentially Significant Impacts and Recommended Mitigation Measures			
Impacts	**Significance Before Mitigation**	**Mitigation Measures**	**Significance After Mitigation**
		sewer service through the City of San Mateo and the College of San Mateo to avoid the construction of utility service pipelines, including a potentially 1,400-foot-long water service pipeline, through sensitive habitats. If water supply and sanitary sewer service cannot be provided through the City of San Mateo and the College of San Mateo, and water supply and sanitary sewer service pipelines from the Town to the Tobin Clark site would be constructed in sensitive habitats, mitigation measures BIO-1, BIO-2, BIO-3, and BIO-4 shall be implemented and the development application for the Tobin Clark site shall be evaluated for consistency with the certified Final EIR for the Project (e.g., compliance with the Final EIR mitigation measures for the Project). In addition, these measures would apply to the construction of any storm drain infrastructure for the Tobin Clark site if said storm drain infrastructure would be constructed in sensitive habitats.	
Wildfire			
Impact WILD-1: Emergency Response and Evacuation Plan Impacts. Development of the Housing Opportunity Sites could have potentially significant evacuation-related impacts, particularly considering the existing General Plan goals, policies, and actions to which the new housing development would be subject do not reflect recent State law requirements and the State Attorney General's Best Practices for Analyzing and Mitigating Wildfire Impacts of Development Projects.	**Potentially Significant**	**Mitigation Measure WILD-1: Emergency Response and Emergency Evacuation Planning.** The Town shall develop and adopt General Plan Public Safety Element goals, policies, and actions that address the following: • Undertake an assessment that uses visual risk assessment and risk factors to identify and prioritize existing deficient evacuation routes. Improve evacuation routes based on the prioritization ranking and in areas identified as having deficient evacuation routes affected by new development, but also in consideration of improvements required for a transportation network which is resilient to wildfire.	**Significant and Unavoidable**

Table 2.1-1: Summary of Potentially Significant Impacts and Recommended Mitigation Measures			
Impacts	**Significance Before Mitigation**	**Mitigation Measures**	**Significance After Mitigation**
		• Undertake an assessment that uses visual risk assessment and risk factors to identify and prioritize substandard segments of roadways and choke point intersections. For each identified substandard roadway segments and choke point intersection identify potential physical improvements that would improve road and intersection conditions, which may include pullouts for passing on narrow roads, improved intersection angles, solar-powered streetlights at key intersections, and intersection controls at uncontrolled intersections. • Implement the findings of both the evacuation routes assessment and substandard and choke point intersections assessment. • Require new development to include adequate roadway ingress/egress for emergency access and evacuation routes. Any future housing development must have at least two points of ingress/egress. • Identify and construct additional local evacuation routes in areas of high hazard concern or limited mobility. • Collaborate with CCFD in the identification and mapping of areas with only one point of ingress or egress and roads that do not meet current emergency access and evacuation standards and the preparation of a program that prioritizes corrective actions. • Commit funding for projects that enhance evacuation safety, spanning road improvement, signage, and notification systems. Ensure identified improvements can be funded in areas	

Table 2.1-1: Summary of Potentially Significant Impacts and Recommended Mitigation Measures			
Impacts	**Significance Before Mitigation**	**Mitigation Measures**	**Significance After Mitigation**
		identified as having deficient evacuation routes as new development occurs. • Track development of minimum standards for roads and evacuation routes and seek to adopt the standard. Apply any state standards for evacuation routes to new development. • Update regularly and make available to the public maps depicting evacuation routes and areas prone to environmental hazards. • Conduct a Townwide evacuation modeling and analysis study that involves: o Evaluation of the capacity of roadways to accommodate project and community evacuation and simultaneous emergency access. o Assessment of the timing for evacuation. o Identification of alternative plans for evacuation depending upon the location and dynamics of the emergency. o Evaluation of the project's impacts on existing evacuation plans. o Consideration of the adequacy of emergency access, including the project's proximity to existing fire services and the capacity of existing services. o Traffic modeling to quantify travel times under various likely scenarios. In addition, require subdivision and multi-family housing developers to prepare project-specific evacuation and modeling analysis that includes the same evaluations as listed above.	

Table 2.1-1: Summary of Potentially Significant Impacts and Recommended Mitigation Measures			
Impacts	**Significance Before Mitigation**	**Mitigation Measures**	**Significance After Mitigation**
		• Develop a specific review application process for new subdivisions in the WUI for modeling impacts for evacuation.	
Cumulative Wildfire Impacts: Development of the Housing Opportunity Sites proposed by the Project could have significant cumulative evacuation-related impacts.	**Potentially Significant**	Implement **Mitigation Measure WILD-1**.	**Significant and Unavoidable**
NOTES: S = Significant Impact LTS = Less than Significant Impact SU = Significant Unavoidable Impact			

Alternatives to the Proposed Project

To provide a basis for further understanding of the environmental effects of a proposed project and possible approaches to reducing its identified significant impacts, the CEQA Guidelines require an EIR to also… “describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of th7k9io e alternatives.”

Identified Alternatives

The EIR is required to describe a range of reasonable alternatives to the project which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project. The alternatives identified in an EIR are based on the potentially significant impacts of the proposed project. This EIR identified significant and unavoidable impacts related to air quality, greenhouse gas emissions, transportation, and wildfire, transportation impacts, and identifies and evaluates the following two alternatives to the Project:

Alternative 1: No Project (Existing Housing Element/2005 General Plan)

The No Project Alternative (i.e., Existing Housing Element/2005 General Plan) assumes that housing development would occur within the Town as directed by the currently adopted 2014-2022 Housing Element and the 2005 General Plan. The No Project Alternative would generate less housing development within the Town because none of the proposed General Plan land use designations or Zoning Code amendments to facilitate greater housing development (changes to General Plan Land Use designations and Zoning designations to allow multi-family housing) within the Town would occur. However, single-family and ADU opportunities would reasonably continue to be developed without adoption of the 2023 – 2031 Housing Element Update, although the number of ADUs developed would likely be less than the proposed Project because ADU development would not be enhanced, supported, or promoted as it would with implementation of the Focused GPU policies and actions.

Therefore, there would be a decrease in overall housing development that is anticipated under the 2023 – 2021 Draft Housing Element as a result of the No Project alternative.

The No Project Alternative would not allow the Town to meet its RHNA requirement or allow the Town to comply with state housing laws. The Town would face significant, adverse repercussions for not adopting a new Housing Element reflecting the 6th cycle RHNA assignment. State housing law identifies penalties that can be levied against jurisdictions that do not adopt new housing elements (see Chapter 5, Alternatives for a detailed discussion). The No Project Alternative would not meet any of the project objectives.

Alternative 2: Reduced VMT Alternative

The proposed Housing Element Update project would have significant and unavoidable project level and cumulative VMT impacts stemming from the lack of transit services within the Town and the difficulty in mitigating VMT impacts from small residential developments. A Reduced

VMT Alternative is presented in this EIR to fulfill CEQA requirements for presenting alternatives to the proposed project that reduce identified impact.

Under the Reduced VMT Alternative, housing proposed in the Draft Housing Element (identified Housing Opportunity Sites) would be relocated from high VMT TAZ to lower VMT TAZ to achieve an overall reduction in project VMT.

The identification of housing opportunity sites to be included in the Reduced VMT Alternative was informed by the VMT modeling results obtained from the C/CAG-VTA model for the Town of Hillsborough. The VMT per capita – the metric for evaluating transportation impacts associated with residential development – is somewhat variable across the six Hillsborough Traffic Analysis Zones (TAZs), as the difference between the lowest and highest TAZs is 3.3 VMT per capita. The highest VMT zone has a VMT per capita that is 17 percent higher than the lowest zone. Therefore, by reallocating proposed residential units from zones with higher VMT to those with a lower VMT, there is the potential to reduce the VMT for the Housing Element as a whole.

In Hillsborough, given the hilly topography in some neighborhoods and the concentration of transit service along the El Camino Real corridor, some sites would be expected to generate considerably less VMT per resident than others. Other site characteristics that would influence the potential VMT reduction include access to retail and services and availability of pedestrian infrastructure. There are two housing opportunity sites where multi-family housing has been proposed that could potentially accommodate additional units. This Reduced VMT alternative assumes that additional units at these sites would be reallocated from higher VMT zones and would not increase the overall number of proposed units.

Environmentally Superior Alternative

If an alternative is considered clearly superior to the proposed project relative to identified impacts, Section 15126.6 of the CEQA Guidelines requires that alternative to be identified as the environmentally superior alternative. By statute, if the environmentally superior alternative is the No Project Alternative, an EIR must also identify an environmentally superior alternative among the other alternatives. The identification of the environmentally superior alternative does not consider the ability of the alternative to meet the stated project objectives; it focuses on environmental impacts only.

While the No Project Alternative would result in similar or reduced impacts compared to the proposed Project due to the decreased amount of development compared to the proposed Project, the No Project Alternative would not meet State laws regarding both the Housing and Safety Elements.

The Reduced VMT alternative would be superior to the proposed Project because it would reduce the VMT impacts associated with the proposed Project while meeting the Town's RHNA. Any other reduction in impacts would not be substantially different from the proposed Project, but the Reduced VMT alternative would comply with State law and would satisfy all but one of the Town's objectives. Therefore, the Reduced VMT alternative is considered the environmentally superior alternative. A comparison of impacts between the project and alternatives is provided below in Table 2.1-2

Table 2.1-2: Alternatives Impacts Compared to Project Impacts			
Impact/Resource	**Proposed Project**	**Alternative 1: No Project**	**Alternative 2: Reduced VMT Alternative**
Aesthetics	SU with Mitigation	LTS with Mitigation	Similar SU with Mitigation
Air Quality	SU with Mitigation	Similar SU	Similar SU, with Mitigation
Biological Resources	LTS with Mitigation	Reduced LTS	Similar LTS with Mitigation
Cultural Resources and Tribal Cultural Resources	SU with Mitigation	Similar LTS	Similar SU with Mitigation
Energy	LTS with Mitigation	Similar LTS	Similar LTS with Mitigation
Geology and Soils	LTS with Mitigation	Slightly greater LTS	Similar LTS with Mitigation
Greenhouse Gas Emissions	SU with Mitigation	Similar SU	Similar SU, with Mitigation
Hazards and Hazardous Materials	LTS with Mitigation	Slightly greater LTS	Similar LTS, with Mitigation
Hydrology and Water Quality	SU with Mitigation	Slightly greater LTS	SU with Mitigation
Land Use	LTS	Reduced LTS	LTS
Noise	LTS	Reduced LTS	Similar LTS
Population and Housing	LTS	Reduced LTS	Similar LTS
Public Services and Recreation	LTS	Reduced LTS	Similar LTS
Transportation	SU with Mitigation	Similar SU	Similar SU, with Mitigation
Utilities and Service Systems	LTS with Mitigation	Reduced LTS	Similar LTS with Mitigation
Wildfire	SU with Mitigation	LTS	Similar SU, with Mitigation
Source: MIG, 2023 LTS= Less than Significant Impacts SU= Significant and Unavoidable Impacts			

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CHAPTER 3 PROJECT DESCRIPTION

Every California city and county is required to have a "General Plan" that functions as a comprehensive, long-range policy document.[11] For cities, the General Plan guides the physical development of the incorporated city (i.e., city limits) and any land outside city boundaries (i.e., unincorporated sphere of influence area (SOI)) that has a relationship to the city's future growth and development. The Town's General Plan Planning Area includes three areas of unincorporated San Mateo County that are within its SOI as described in section 3.2, below. For the purposes of this EIR the General Plan Planning Area is considered the Project's "Planning Area."

The Town of Hillsborough General Plan was adopted in 2005 and includes the Housing Element (last updated and adopted in 2014), Land Use Element, Circulation Element, Open Space and Conservation Element, Public Safety Element, and Noise Element.

The Town proposes to make a comprehensive update to the 5th cycle Housing Element (2014-2022) and minor amendments to the Land Use Element and General Plan Land Use Map, Open Space and Conservation Element, and Public Safety Element. The Town is preparing a comprehensive update to the Public Safety Element separately from this project, which will address climate change resiliency and wildfire planning as required by SB 379 and CGC section 65302[g].[12]

Because the Town is revising specific portions of the General Plan, these updates are referred to as a Focused General Plan Update (Focused GPU). In addition to the Focused GPU, the Town is proposing specific amendments to Title 17 (Zoning) of the Hillsborough Municipal Code, and amendments to the Hillsborough Zoning Map. Amendments to Title 17 and the Zoning Map are made to comply with CGC Section 65300 et seq. that require zoning to be consistent with the Focused GPU and amendments to the General Plan Land Use Map. Other changes to the Municipal Code would be necessary to ensure implementation of the 6th cycle Housing Element Update (2023 - 2031) policies and actions, including adopting objective development standards for multi-family development and possible code revisions related to the subdivision ordinance. Therefore, the proposed "Project" that will be evaluated in this EIR is adoption of the Focused GPU, amendments to Title 17 of the Hillsborough Municipal Code and Zoning Map, and other Municipal Code revisions (collectively, Focused GPU, or the Project). It is important to note that the Land Use, Open Space and Conservation, and Public Safety elements, Title 17 Municipal Code and Zoning Map, and other Municipal Code revisions are updated only to reflect and support the updated 6th cycle Housing Element (see Sections 3.3.3 through 3.3.11, which follow).

[11] Each planning agency shall prepare and the legislative body of each county and city shall adopt a comprehensive, long-term general plan for the physical development of the county or city, and of any land outside its boundaries which in the planning agency's judgment bears relation to its planning. CA Govt Code § 65300 (2023).

[12] State General Plan Law requires a city or county (or city and county) that concurrently adopts or revises two or more general plan elements on or after January 1, 2018 to adopt or review the environmental justice element or the environmental justice goals, policies, and objectives in other elements if the city, county, or city and county has a disadvantaged community. The Town of Hillsborough does not have any SB 535-designated disadvantaged communities and therefore this requirement does not apply. CA Govt Code § 65302(h) (2023).

The intent of updating the Housing Element is to plan for the housing needs of the Hillsborough community while meeting the State's housing goals, as set forth in CGC, Article 10.6. The Draft 2023 – 2031 Housing Element Update analyzes housing needs in Hillsborough, the resources available to meet those needs, and the governmental and non-governmental constraints that tend to work against increasing the supply of affordable housing. Housing Element goals, policies, and action programs have been crafted to facilitate the Town's use of its limited financial resources and buildable land to maximum advantage to meet the RHNA requirements.

The Project will ensure that the General Plan meets the requirements of the CGC, Article 5 (Authority for and Scope of General Plans); addresses changes to the demographic, economic, and environmental conditions in Hillsborough that are anticipated to occur through the year 2031; and that Title 17, Zoning is consistent with the General Plan and supports the implementation of the updated Housing Element. The Project includes goals, policies, and actions, and amendments to Title 17 of the Municipal Code to be enacted after adoption of the Focused General Plan Update Project; however, this EIR contemplates these actions as implementing actions and activities of the Project. The purpose of the amendments is to make Title 17 consistent with the goals, policies, and actions of the Project.

To avoid undue repetition, this EIR does not duplicate the detailed contents of the Housing Element; however, the full text of all new or revised policies and programs included in the proposed Project is provided in Appendix B of this EIR. The reader is encouraged to review the Draft 2023 – 2031 Housing Element for more detail. The Draft 2023 – 2031 Housing Element and other information about the Town's Housing Element planning process are also available online at the following web address:

https://www.hillsborough.net/553/2023-2031-Housing-Element-Update

3.1 Background

3.1.1 State Regional Housing Needs Allocation

CGC, Section 65584 recognizes local governments play a vital role in developing housing affordable to all income levels. In 1969, the State mandated all California cities, towns, and counties must plan for the housing needs of residents, regardless of income. This mandate is called the Housing Element and Regional Housing Needs Allocation, or RHNA. As part of RHNA, the HCD determines the total number of new homes California needs to plan for, and their affordability levels to meet the housing needs of people at all income levels. The state-wide RHNA is then broken down into regional allocations, which are then assigned to the local jurisdictions.

The Association of Bay Area Governments (ABAG)[13] representing nine counties and 101 cities and towns in the San Francisco Bay area region, working with a designated Housing Methodology Committee, distributes a share of the region's housing need to each city, town, and county in the region. Each local government must then update its Housing Element to show the locations where housing can be built to accommodate the RHNA and the policies and strategies necessary to meet the community's housing needs.

[13] The Association of Bay Area Governments (ABAG) is the comprehensive regional planning agency and council of governments for the nine counties and 101 cities and towns of the San Francisco Bay region.

For the ABAG region, the RHNA covers an 8.5-year projection period (June 30, 2022 – December 15, 2030, also known as the Sixth Cycle) and is divided into four income categories: very low, low, moderate, and above moderate (within the very low-income category is the "extremely low-income category). The ABAG region's projected housing need is 441,176 new housing units for the Sixth Cycle (2023 – 2031).

In developing a methodology to assign the RHNA, ABAG must meet five statutory objectives, as summarized below:

1. Increasing housing supply and mix of housing types, tenure, and affordability in all cities and counties in an equitable manner throughout the region;
2. Promoting infill development and socioeconomic equity, protecting environmental and agricultural resources, encouraging efficient development patterns, and achieving greenhouse gas (GHG) reductions targets;
3. Promoting an improved intraregional jobs-housing relationship, including a balance between low-wage jobs and affordable housing (jobs/housing fit);
4. Balancing disproportionate household income distributions (more high-income RHNA to lower-income areas and vice-versa); and
5. Affirmatively further fair housing.

The RHNA must also be consistent with the growth pattern identified in Plan Bay Area 2050 published jointly by the Metropolitan Transportation Commission (MTC) and Association of Bay Area Governments (ABAG), which is the Bay Area region's long-range plan for transportation, housing, the economy, and the environment.

The Town of Hillsborough's existing Housing Element covers the period of 2014 - 2022 (Fifth Cycle) and includes an RHNA allocation of 91 new housing units to be planned for during the 2014 through 2022 planning period. Between 2014 and 2021, building permits were issued for 192 units of the current 91-unit RHNA assignment, which exceeded the full RHNA allocation. Hillsborough was one of only 38 jurisdictions, representing 7.5% of the 501 jurisdictions, in the State to have met their prorated Lower (Very-Low and Low) and Above-Moderate Income RHNA for the Reporting Period. The Town was assigned 70 units in the very low, low- and moderate-income categories (32 very low, 17 low- and 21 moderate-income) and issued building permits for 76 very low, 44 low- and 42 moderate-income units during this period. The Town was also assigned 21 units in the above moderate-income category and issued building permits for 30 above moderate-income units during this period.

3.1.2 6th Cycle Housing Element Update

All California cities and counties are required to update their existing Housing Elements to reflect the current RHNA assignments in the 6th cycle Housing Element update, which covers an eight-year period for 2023 through 2031. Housing Elements are required to be reviewed and certified by the HCD.

The ABAG jurisdictions' housing element update statutory deadline for adoption was January 31, 2023. Government Code requirements state that jurisdictions must adopt housing element updates within 120 calendar days from the statutory deadline. A draft of the Hillsborough 2023 –

2031 Housing Element and related documents were submitted for HCD review in March 2023. The Town revised the draft 2023 – 2031 Housing Element in response to HCD's second round of review comments and submitted a revised housing element for third review on October 2, 2023.

A housing element's components, as required by CGC, Section 65583, include a:

- Detailed analysis of the Town's demographic, economic, and housing characteristics;
- Comprehensive analysis of the barriers to producing and preserving housing;
- Review of the Town's progress in implementing its adopted housing policies and programs;
- Identification of goals, objectives, and policies, in addition to a full list of programs that will help the Town carry out the plan's vision; and
- List of sites that could accommodate new housing, demonstrating the Town's ability to meet its target number of new homes established in the RHNA.

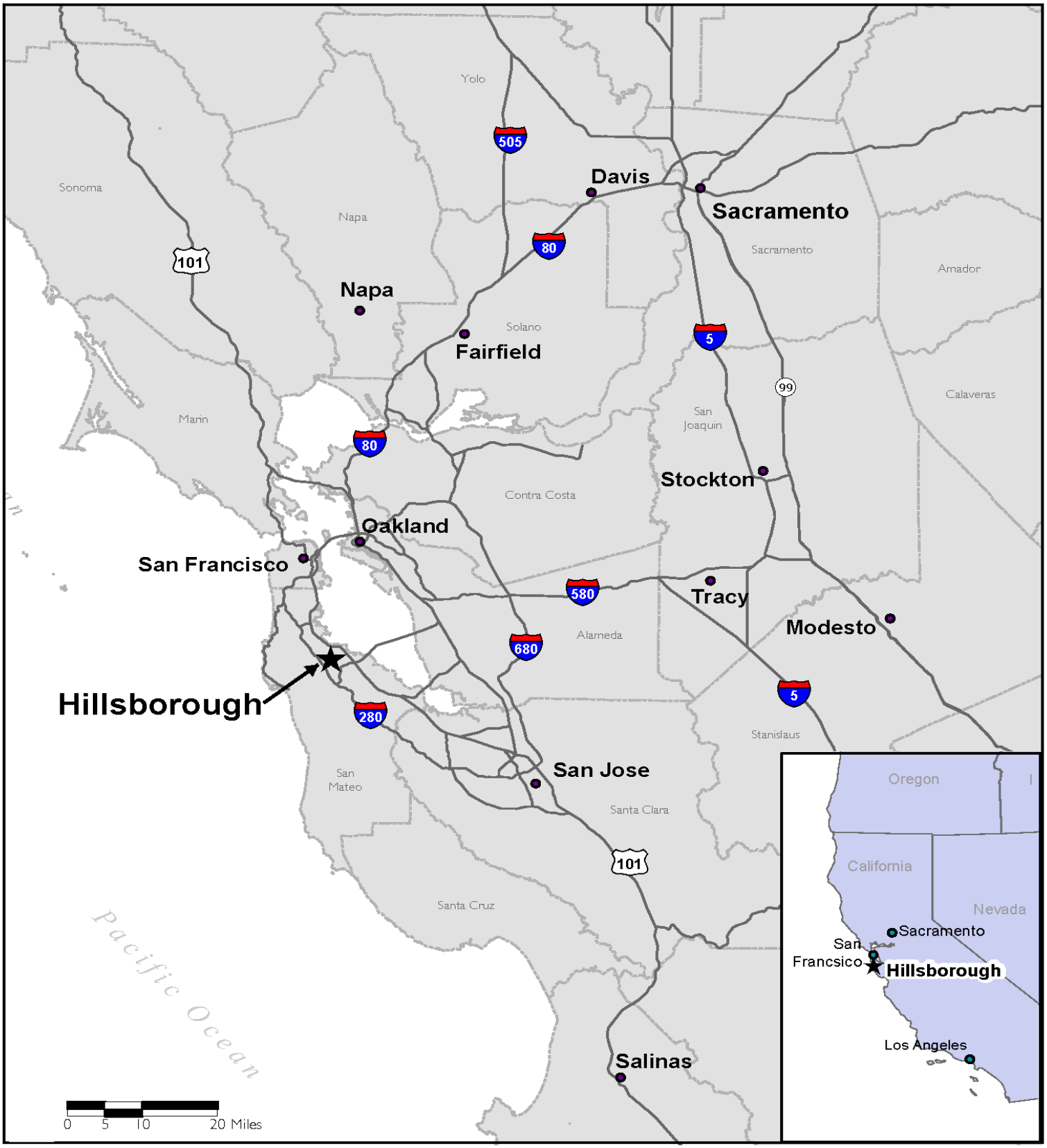
3.1.3 Other Updates for Consistency

The proposed Housing Element Update require updates to other General Plan elements, Title 17, Zoning of the Municipal Code, and other Municipal Code revisions as may be necessary for internal consistency of all Town documents, codes, and regulations. The following items require minor edits to maintain consistency with the proposed Housing Element Update:

- Land Use Element, including General Plan land use designations map and land use designations;
- Open Space and Conservation Element;
- Public Safety Element
- Title 17, Zoning and Zoning Map; and
- Other Municipal Code revisions necessary to implement the Housing Element Update.

3.2 Project Location and Environmental Setting

The Town of Hillsborough is located in the north-central part of San Mateo County on the San Francisco Peninsula. Hillsborough's town limit extends to the City of Burlingame to the north, the City of San Mateo to the east, and unincorporated areas of San Mateo County to the west and south. Regional access to the Town is provided via El Camino Real (SR 82) and Highway 101 to the east of the town, Junipero Serra Freeway (I-280) along the western border of the town, and Highway 92 to the south of the town limits (see Figure 3.2-1: Regional Location).



Source: Town of Hillsborough

★ Project Location

Figure 3.2-1 Regional Location

Town of Hillsborough 6th Cycle Housing Element Update Draft EIR

The Planning Area includes lands within the Town's corporate limits and lands within the Town's General Plan Planning Area (Sphere of Influence). See Figure 3.2-2: Project Planning Area.[14]

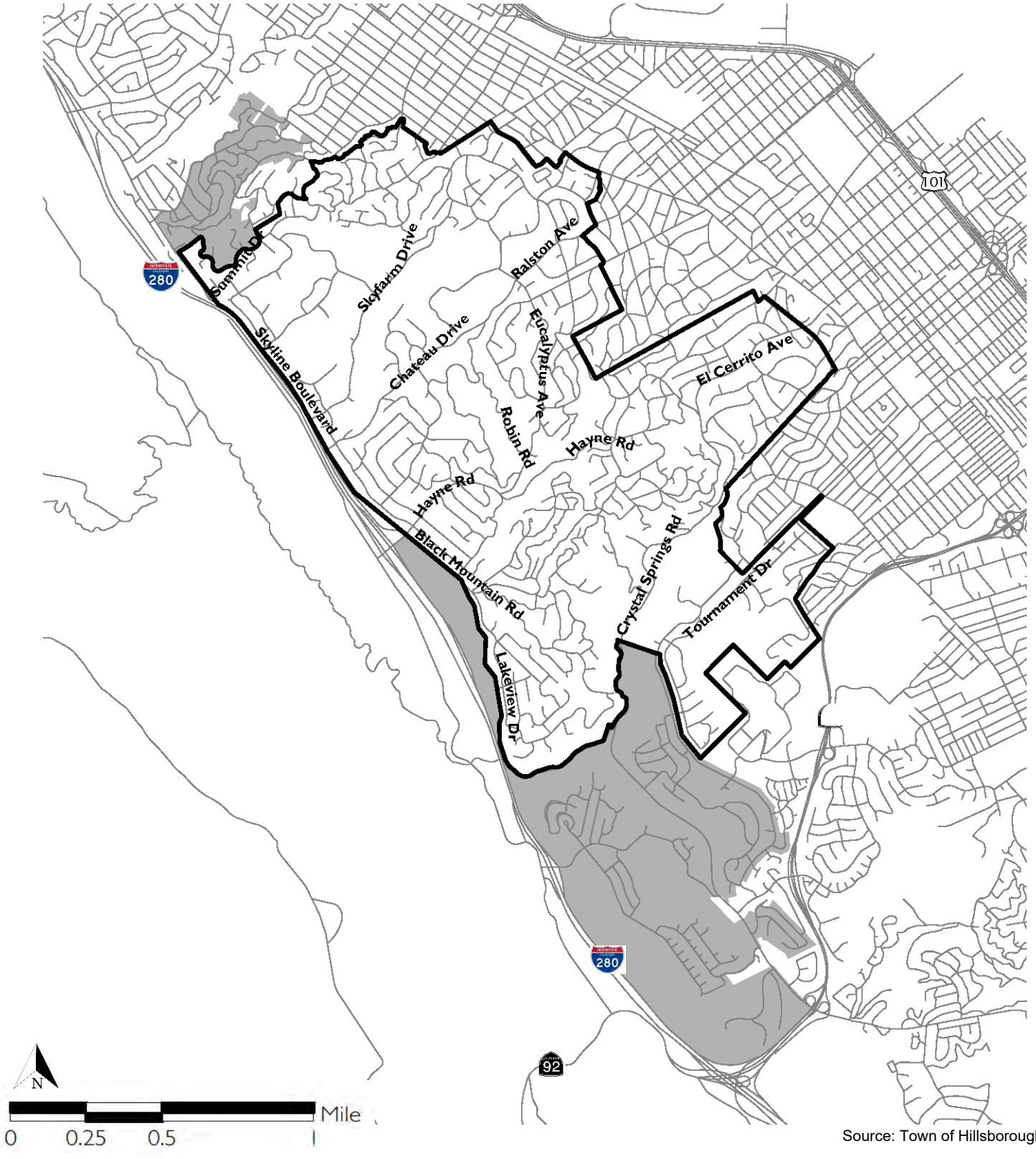
The Town of Hillsborough encompasses approximately 6.1 square miles, nearly all of which are developed with residential land uses. The Town's General Plan Planning Area includes three areas of unincorporated San Mateo County land that are within its SOI: 1) land east of I-280 between the Town limit and the City of Burlingame, in the north; 2) the San Francisco Public Utilities Commission (SFPUC) parcel located along Hillsborough's western boundary, between I-280 and Black Mountain Road; and 3) unincorporated land east of I-280 between the Town limit and the City of San Mateo in the south. These three areas total approximately 888 acres. San Francisco is located approximately 11 miles north of the Town; San Jose is approximately 23 miles to the southeast. The Town's Planning Area consists of 4,080 total parcels encompassing 3,928 acres (Figure 3.2-2: Project Planning Area). According to the 2020 Census, the Town has a population of 11,384 residents.

The Planning Area primarily contains single-family residences built on large parcels that are intermixed with mature woodland and forest communities, and dense vegetation. The hilly topography includes areas with steep slopes and ravines, with elevations ranging from approximately 20 to 30 feet mean sea level (MSL) in the east (near El Camino Real) rising to approximately 600 to 700 feet MSL in the west (near I-280). The Town is drained in a northeasterly direction by several streams that ultimately discharge to San Francisco Bay. San Mateo Creek forms the boundary between Hillsborough and the City of San Mateo. Oak woodland occurs along drainage areas and in undeveloped areas of the Town, providing habitat to several sensitive species of plants and animals.

Many of the steep hillsides are susceptible to landslides and erosion due to steepness of slopes, type and density of vegetation, and strength of underlying soils and rock formations. Soil creep and shallow slope failures can be common after heavy rain events. The southern half of the Town is largely located in a State-designated Very High Fire Hazard Severity Zone; most of the Town is in a Wildland Urban Interface area. Because of the difficulty of vegetation management on steep hillsides these areas may become highly flammable and result in increased wildfire risk.

Among the many earthquake faults in the area, the San Andreas fault stretches through the Coast Ranges and passes by Crystal Springs Reservoir along a rift valley about ½ mile west of the Town. The Pilarcitos Fault and San Gregorio Fault are farther west, and the Hayward Fault and Calaveras Fault are to the east.

[14] Prior to any potential development of these General Planning Area lands, the Town would need to seek approval of a SOI amendment and annex these lands into the Town's boundaries. This would require approval from the San Mateo County Local Agency Formation Commission; however, the Town does not seek to incorporate these lands at any time in the near future.



Planning Area/Sphere of Influence

Hillborough Town Limits

Figure 3.2-2 Project Area

There are two airports in the vicinity of Hillsborough, the San Francisco International Airport (SFO) and the San Carlos Airport. The San Francisco Airport is approximately 1.8 miles northeast of the Town's northern boundary; the entire Town is located in Airport Influence Area A and a portion roughly north of Chateau Drive is located in Airport Influence Area B.[15] The San Carlos Airport is approximately 4.6 miles southeast of the Town's southern borders and a portion of the Town southeast of Chateau Drive/Ralston Avenue is within the San Carlos Airport's Area of Influence Boundary A; no portion of the Town is located within Area of Influence Boundary B.[16]

3.2.1 Land Use

According to the Town of Hillsborough General Plan, residential land use represents the predominant existing land use type in Hillsborough (2,961 acres), which accounts for more than three-quarters (75 percent) of the total land area. Public facilities and services uses, including public schools, make up approximately 55 gross acres (about one percent). Private school uses total approximately 43 gross acres (one percent). Open space and conservation uses encompass 264 gross acres (about seven percent). Private recreational uses make up approximately 113 acres (about three percent). Roadways and other rights of way total approximately 492 gross acres (about 13 percent). The Town currently does not have any multi-unit residential, mixed-use, commercial, or industrial land uses. Figure 3.3-1: Existing General Plan Land Usepresents existing General Plan land use designations within the Town**.** Figure 3.3-2: Existing presents the Town's existing zoning designations.

3.3 Proposed Project

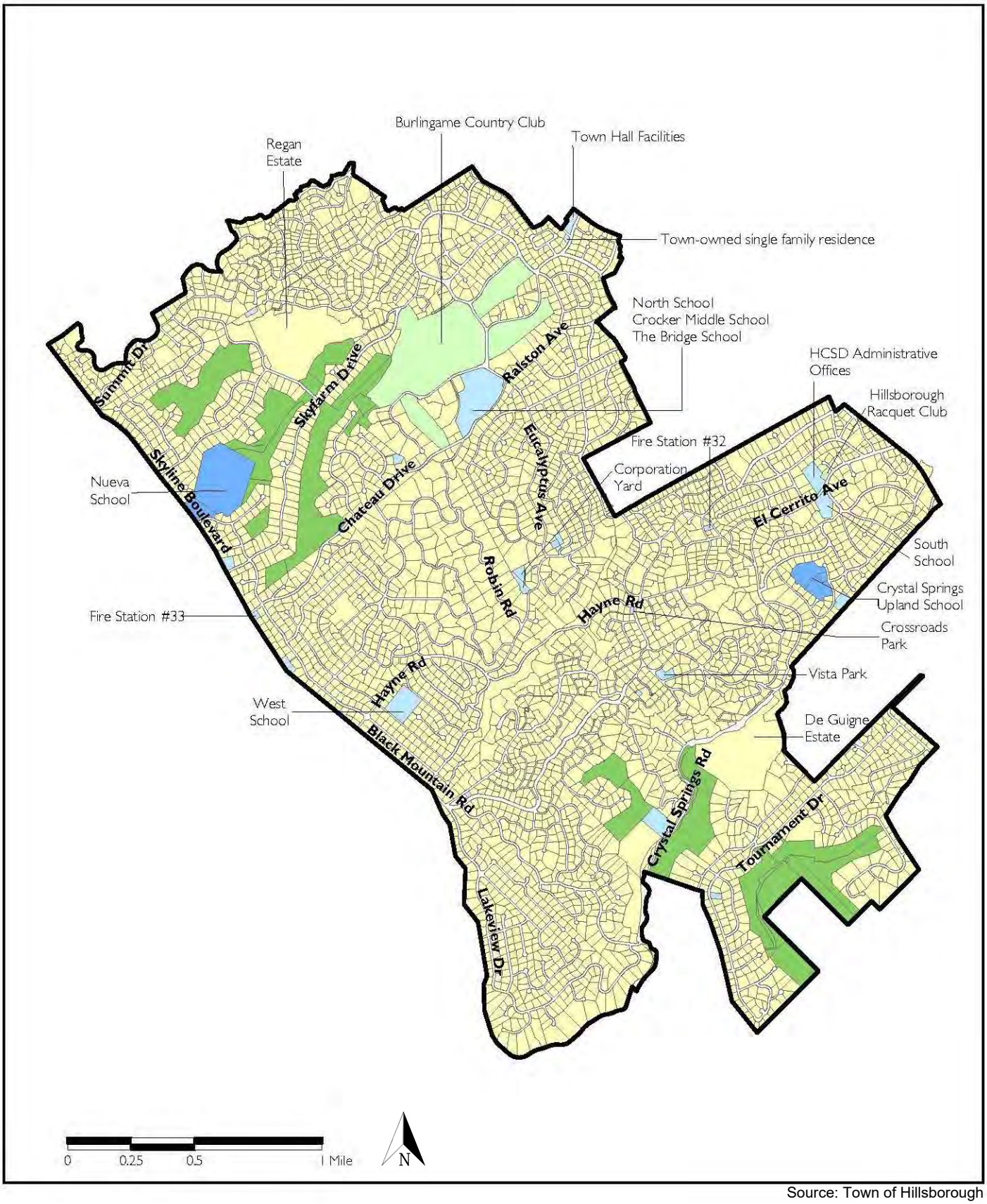
3.3.1 Purpose and Objectives

The Focused GPU establishes the goals, policies, and programs that will provide Town staff and discretionary bodies with a foundation for decisions related to long-range planning for housing development within the town. The overarching goal of the program is to revise the adopted Housing Element to create a policy framework that meets the objectives listed below. For the purposes of this Program EIR, the Project objectives include the following:

1. Promote the preservation and improvement of existing housing and neighborhoods, and promote new housing growth to provide more affordable and market rate housing that meets the Town's Cycle 6 Regional Housing Needs Allocation (RHNA).
2. Meet housing needs by encouraging a variety of housing development affordable at all income levels, including construction of Accessory Dwelling Units (ADUs), multi-family housing on Town-owned land, subdivision/lot split opportunity sites, and other housing choices on vacant opportunity sites, private recreational sites, and institutionally owned sites.

[15] City/County Association of Governments of San Mateo County, Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport, November 2012.

[16] City/County Association of Governments of San Mateo County, Final Comprehensive Airport Land Use Compatibility Plan For the Environs of San Carlos Airport, Adopted October 2015.



Source: Town of Hillsborough

Residential

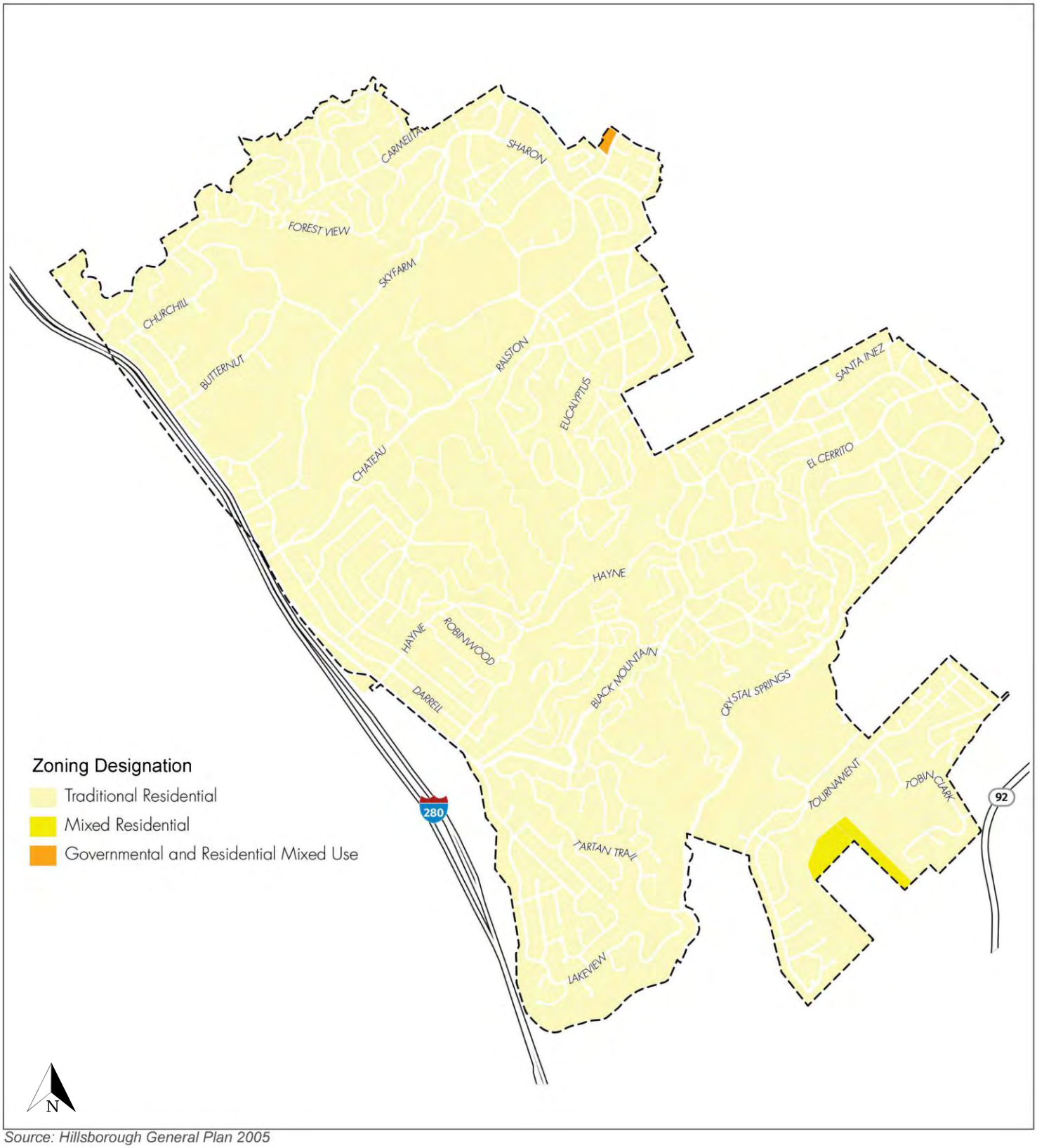
Public Facilities & Services

Private Facilities

Open Space & Conservation

Private Recreational

Figure 3.3-1 Existing General Plan Land Use Map



Source: Hillsborough General Plan 2005

Figure 3.3-2 Existing Zoning Map

3. Reduce, remove, and/or mitigate potential governmental constraints and barriers to housing development and promote equal housing opportunities for all people; incorporate best practices related to land use, racial equity, mobility, housing affordability, safety, environmental justice, community services, and healthy neighborhoods.
4. Affirmatively further fair housing, and take meaningful actions to overcome patterns of segregation, promote fair housing choice, eliminate disparities in opportunities, and foster inclusive communities free from discrimination.
5. Provide adequate housing for all segments of the population, within the Town's constraints; promote and assist in the development of housing that meets the needs of special needs communities in Hillsborough while protecting the character of the Town.
6. Engage residents and stakeholders to generate ideas for potential Town-specific approaches to meet the Town's Cycle 6 RHNA, gain insight on the greatest challenges and opportunities that face Hillsborough, and ensure equitable and inclusive processes, policies, investments, and service systems.
7. Expand and update technology and innovative practices to create smart, sustainable communities, and adaptable infrastructure systems.
8. Protect lives and property from risks associated with wildfire-related emergencies; reduce the potential loss of life, injury, and property damage due to flooding, and seismic and geologic hazards.

3.3.2 Regional Housing Needs Allocation

The Town of Hillsborough has a RHNA assignment of 554 new housing units for the 2023 - 2031 planning period. As indicated in Table 3.3-1, this is broken down into 155 very low-income units, 89 low-income units, 87 moderate-income units, and 223 above moderate-income units. The RHNA assignment represents approximately 14 percent of the existing housing units within the Town limits. Because the Housing Element must plan for or have policies in place to accommodate the RHNA assignment in any given planning period, jurisdictions typically plan for a slightly higher number of housing units than the actual RHNA assignment (considered "buffer" units and required by HCD). This allows for some market variation and demand. In addition, as HCD completes their review of the Housing Element, some of the identified opportunity sites may be removed and planning for a buffer allows the Housing Element to still meet RHNA requirements. For the purposes of this CEQA document, the Town is planning for and evaluating a total of 605 units (554 RHNA + 51 buffer units).

The Draft 2023 – 2031 Housing Element demonstrates that Hillsborough has sufficient capacity to meet its 2023 - 2031 RHNA obligations with accessory dwelling unit construction, projects in the pipeline, and identified housing opportunity sites.

Table 3.3-1: Hillsborough 6th Cycle RHNA			
Income Group	**% of County Median Family Income**	**RHNA**	**Percentage of Units**
Very Low	0 -50%	155	28%
Low	51 – 80%	89	16%
Moderate	81 – 120%	87	16%
Above Moderate	120% +	223	40%
Total Units		**554**	**100%**
Source: Town of Hillsborough, 2023 – 2031 Housing Element; MIG, Inc.			

To meet the RHNA target, the Town is implementing different categories of strategies to increase residential capacity including:

- Accessory dwelling units (ADUs) and junior ADUs,
- Pipeline projects (projects in varying stages of the approval process),
- Vacant opportunity sites (single vacant parcels that could be suitable for development),
- Subdivision/lot split opportunity sites (larger sites that could allow for subdivision or lot splits); and
- Multi-family opportunity sites (sites that could be suitable for multi-family development, either based on property owner interest or Town owned land).

The Housing Element maps are updated to show where future housing is anticipated to be built to meet the RHNA (Housing Opportunity Sites) and identifies the potential number of residential units that may be built at the locations, consistent with State law.

The Housing Element is integral to other General Plan Elements and is consistent with the goals and policies set forth by the General Plan. The Land Use Element will be updated to reflect land use and density changes and other policies to be consistent with the Housing Element and the Open Space and Conservation and Public Safety Elements will be updated for internal consistency. Likewise, Title 17, Zoning, of the Municipal Code will be amended for consistency with the General Plan in accordance with State law.

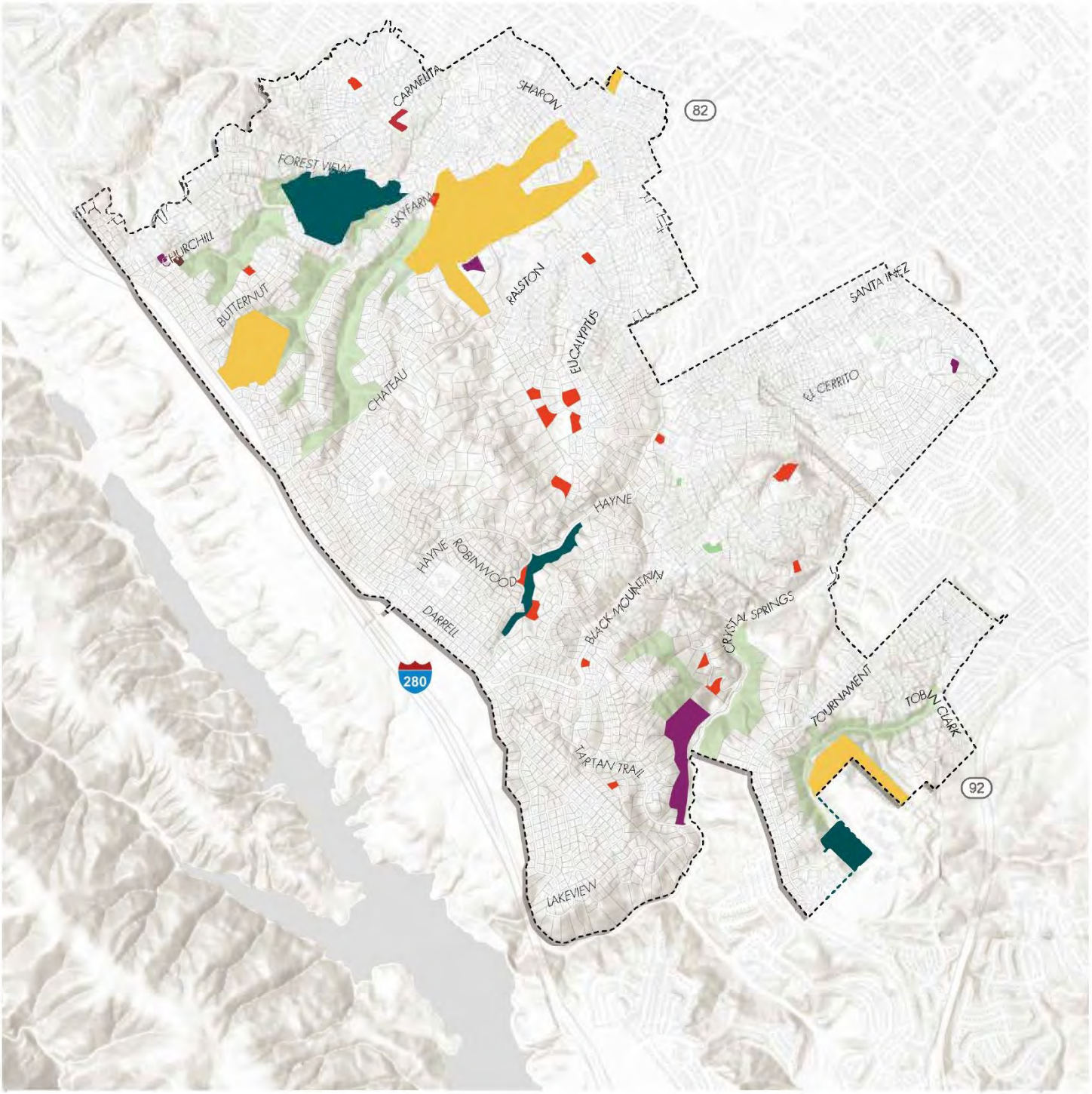
Housing elements identify possible sites where future homes can be built, called “housing opportunity sites,” and identify the potential number of homes that can be built on these sites. After extensive discussion and community outreach, the Town has identified five approaches to produce the number of sites to meet the RHNA assignment: Approach 1: Accessory Dwelling Units (ADUs); Approach 2: Pipeline Projects; Approach 3: Vacant Opportunity Sites; Approach 4: Subdivision/Lot Split Opportunity Sites; and Approach 5: Multi-Family Opportunity Sites. The housing opportunity sites identified in these five approaches and potential numbers of units are indicated in Table 3.3-2.

Table 3.3-2: Comparison of Housing Element Approaches and RHNA					
	Extremely/ Very Low-Income (0-50% AMI*)	**Low-Income (50-80% AMI)**	**Moderate-Income (0-120% AMI)**	**Above-Moderate Income (+120%)**	**Total**
2023 – 2031 RHNA Housing Units	155	89	87	223	554
Approach 1: Accessory Dwelling Units (ADUs)	120	80	80	120	400
Approach 2: Pipeline Projects	0	0	0	12	12
Approach 3: Vacant Opportunity Sites	0	0	0	23	23
Approach 4: Subdivision/Lot Split Opportunity Sites	0	0	0	43	43
Approach 5: Multi-Family Opportunity Sites	51	9	17	50	127
Total	171	89	97	248	605
“No Net Loss” Buffer (15-30% recommended by HCD)	16	0	10	25	51
Percentage	10.3%	0%	11.5%	11.2%	9.2%
Source: Town of Hillsborough, 2023 – 2031 Housing Element; MIG, Inc.					

Figure 3.3-3: Housing Opportunity Sites – Approaches 2-5 shows the locations of housing sites proposed under Approaches 3-5. Since Approach 1 ADUs could be developed on any residential parcel, this approach is not reflected in Figure 3.3-3: Housing Opportunity Sites – Approaches 2-5**.**

3.3.3 Approach 1: Accessory Dwelling Units (ADUs)

The Town’s current accessory dwelling unit (ADU) program has proven to be successful, with an annual average of 29 ADUs over the previous Housing Element planning period (2014 - 2022). Interest in ADU development with Hillsborough is shown by the increase over the past two years, with an annual average of 65 ADUs constructed for 2021 - 2022. The Town’s existing Municipal Code and Zoning Ordinance allow ADUs on almost every residential lot, although the size of the ADU may be subject to the lot size and setback requirements. The proposed Housing Element includes several goals and actions to bolster and enhance ADU development. Based on the increase in community interest in building ADUs and ADU permitting, and the addition of new ADU-related goals and actions in the proposed Housing Element, the Town projects that a total of 400 ADUs could be anticipated to be built over the planning period (approximately 50 units per year), as shown in Table 3.3-3. Table 3.3-3 also shows the ADU breakdown by income: 120 very low-income units, 80 low-income units, 80 medium-income units, and 120 above-moderate income units.



Source: Town of Hillsborough

Legend

- Hillborough Town Limits
- Approach 2: Pipeline Projects
- Approach 3: Vacant Opportunity Sites
- Approach 4: Subdivision/Lot Split Opportunity
- Approach 5: Multi-Family Opportunity Sites

Figure 3.3-3 Housing Opportunity Sites - Approach 2-5

Table 3.3-3: Accessory Dwelling Units (ADUs)					
	Unit/Income Category Breakdown**				
Address/Name*	VL	L	M	AM	Total Units
Various (throughout Town)	120	80	80	120	400
Source: Town of Hillsborough, 2023 – 2031 Draft Housing Element.					

3.3.4 Approach 2: Pipeline Projects[17]

At the time of preparation of this Draft EIR, there are five residential projects under review by the Town. The Town anticipates completion of these pipeline projects during the planning period, and they are therefore counted under the 6th Cycle Housing Element. In addition, the proposed 6th Cycle Housing Element includes several goals and actions designed to streamline and enhance the residential development approval process. These pipeline projects would result in the development of 12 housing units, as shown in Table 3.3-4. Table 3.3-4 also indicates that all 12 units would be above-moderate income units. Figure 3.3-3 shows the location of Pipeline Projects.

Table 3.3-4: Pipeline Projects					
	Unit/Income Category Breakdown**				
Address/Name*	VL	L	M	AM	Total Units
Callan Subdivision APN: 038-271-090, 038-110-160, 038-121-160	0	0	0	8	8
2895 Churchill Drive APN: 028-484-050	0	0	0	1	1
New Place Road APN: 028520010	0	0	0	1	1
Forest View Avenue APN: 028061100	0	0	0	1	1
65 Bridge Road APN: 032-421-070	0	0	0	1	1
Total	0	0	0	12	12
Source: Town of Hillsborough, 2023 – 2031 Draft Housing Element. *See Figure 3.3-3					

[17] "Pipeline Projects" are projects in process (i.e., at various stages of development), and which the Town is committed to facilitating their completion.

Table 3.3-4: Pipeline Projects					
	Unit/Income Category Breakdown**				
Address/Name*	VL	L	M	AM	Total Units
**Income Categories: VL = Very Low; L = Low; M = Moderate; AM = Above Moderate					

Because the Pipeline Projects are individual projects already in the Town's review process, they are not being evaluated in this EIR with the exception of their contribution to total potential housing buildout (including cumulative implications).

3.3.5 Approach 3: Vacant Opportunity Sites

The Housing Element planning process conducted a study to determine the availability of vacant parcels within the Planning Area that could be suitable for development.[18] The initial analysis identified a total of 136 vacant parcels. These possible parcels were reviewed with consideration of a variety of factors, such as the existing land use and total area of a parcel, shape and slope of the lot, site access, physical or biological constraints, distance from amenities such as schools, retail areas, employment opportunities, and transit, fire hazard (identifying minimal fire hazard), slope, and landslide/liquefaction risk (as a barrier to development), and similar criteria were identified. This analysis of housing suitability allowed town staff, elected and appointed officials, and residents to identify a total of 23 vacant housing opportunity sites suitable for residential development, which would result in the development of 23 housing units, as shown in Table 3.3-5. Table 3.3-5 also indicates that all 23 units would be above-moderate income units. Figure 3.3-3 shows the location of Vacant Opportunity Sites.

Table 3.3-5: Vacant Opportunity Sites					
	Unit/Income Category Breakdown**				
Address/Location*	VL	L	M	AM	Total Units
Various	0	0	0	23	23
Source: Town of Hillsborough, 2023 – 2031 Draft Housing Element. *See Figure 3.3-3 **Income Categories: VL = Very Low; L = Low; M = Moderate; AM = Above Moderate					

3.3.6 Approach 4: Subdivision/Lot Split Opportunity Sites

The Town reviewed available sites that could allow for subdivision or lot splits and identified three opportunities that meet the Town's zoning and subdivision standards. Figure 3.3-3: Housing Opportunity Sites – Approaches 2-5 shows the location of the Subdivision/Lot-Split

[18] The methodology for this analysis is explained in more detail in the Housing Element Update (pp. 112-117).

Opportunity Sites. Although there have been no applications for projects received or approved for these sites, they could, if subdivided, result in 43 new parcels and housing units, as follows:

- 2260 Redington Road: The site would involve subdividing the existing approximately 50-acre parcel to create 35 parcels, either to build single-family houses or for sale for future building. The Town has received a concept plan and formal subdivision application, and has determined that no rezoning would be required, though approvals for subdivision and standard development review would be required. As shown in Table 3.3-6, all 35 units would be above-moderate income units**.** Figure 3.3-4: Conceptual Land Use Plan for Redington Road shows a conceptual land use plan for this parcel.
- 50 Brooke Court: The site is an approximately 12-acre vacant parcel at the end of Brooke Court, adjacent to the College of San Mateo in the south of Hillsborough. Though subdivision of the parcel into three lots was approved in September 1991 (see Figure 3.3-5), the subdivision was never recorded and the parcel remains intact and has not been subdivided. The parcel could be subdivided into three parcels either to build single-family houses or for sale for future building. A project proposal would require approvals for subdivision and the Town's standard development review process. As shown in Table 3.3-6, the three units anticipated on the subdivided parcels would all be above-moderate income units.
- Hayne Road: The site along Hayne Road is an approximately 11-acre parcel that runs roughly southwest along Hayne Road, generally parallel to Sandra Road, to the intersection of Hayne Road and Robinwood Lane, and from there southward, generally following along Robinwood Lane and, later, Denise Drive. The parcel is vacant, and according to a concept plan could be subdivided into five parcels. The Town has not received a formal application, and a project proposal would require approvals for subdivision and the Town's standard development review process. As shown in Table 3.3-6, the five units anticipated on the subdivided parcels would all be above-moderate income units. Figure 3.3-6: Conceptual Land Use Plan for Hayne Road shows a Conceptual Land Use Plan for the Hayne Road parcel.



Figure 3.3-4 Conceptual Land Use Plan - 2260 Redington Road

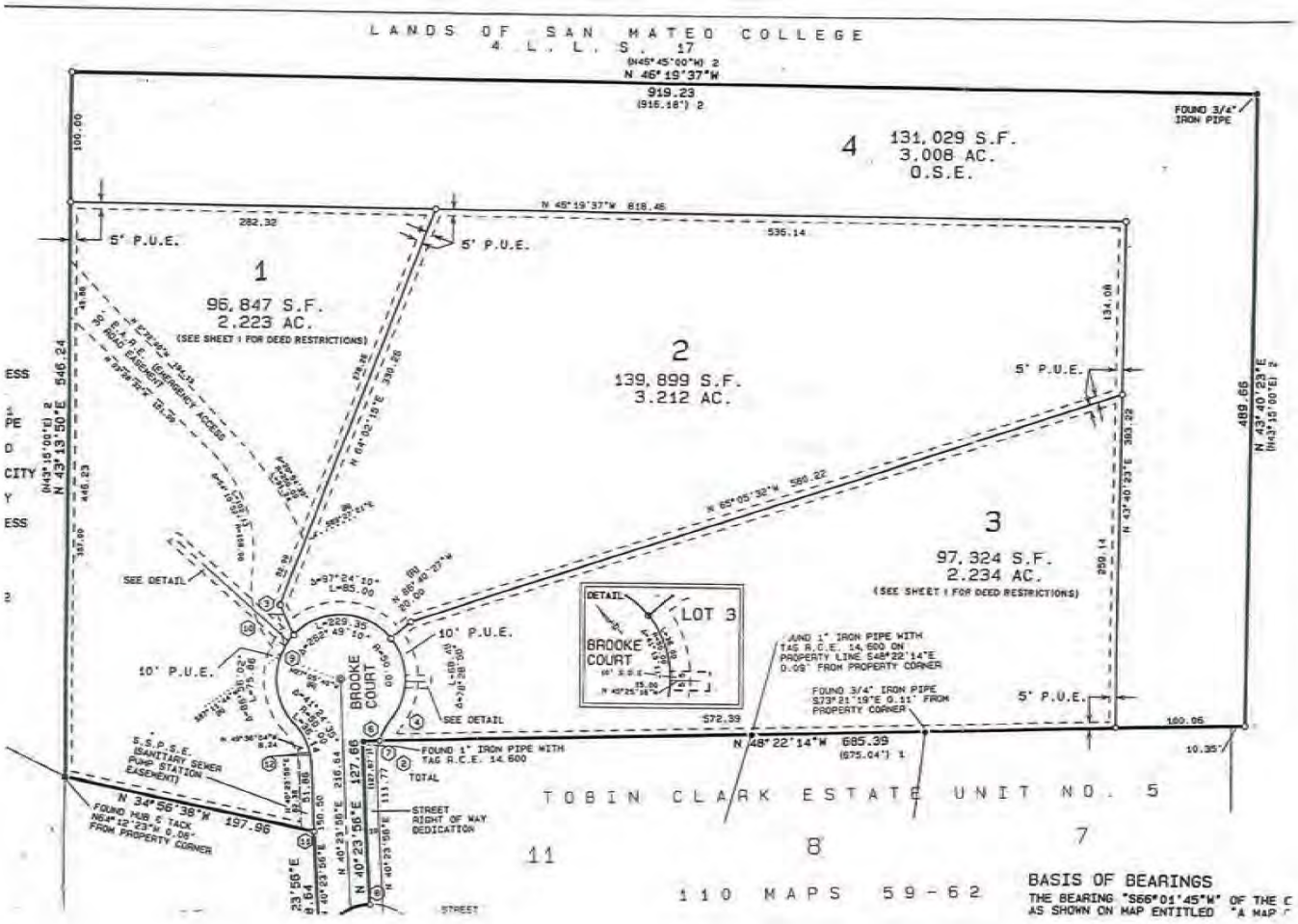


Figure 3.3-5 50 Brooke Court Subdivision Map



Figure 3.3-6 Conceptual Site Plan – Hayne Road

Table 3.3-6: Subdivisions/Lot-Split Opportunity Sites					
	Unit/Income Category Breakdown**				
Address/Name*	VL	L	M	AM	Total Units
2250 Reddington Road APN: 028-040-120	0	0	0	35	35
50 Brooke Court APN: 038-281-280	0	0	0	3	3
Hayne Road APN: 030-191-030	0	0	0	5	5
Total	**0**	**0**	**0**	**43**	**43**
Source: Town of Hillsborough, 2023 – 2031 Housing Element.					

3.3.7 Approach 5: Multi-Family Opportunity Sites

There are currently no multi-family housing opportunities in the Town. Therefore, to provide housing choice and opportunities in support of affirmatively furthering fair housing, the Town is proposing two Town-owned sites for multi-family development and has received letters of interest from two private landowners for developing housing on their sites, as described below. Figure 3.3-3: Housing Opportunity Sites – Approaches 2-5 shows the locations of the multi-family opportunity sites.

- Town Hall Campus: This approximately 2.5-acre Town-owned site is located near the intersection of Floribunda Avenue and El Camino Real, which offers proximity to transit, daily shopping needs, job opportunities, and educational opportunities. The site currently contains buildings with Town offices and the Hillsborough Police Department, a small parklet (Centennial Park, home to a Veteran's Memorial), several parking lots, and a single-family home. The main Town Hall building also serves as a community center, and hosts activities and meetings including civic events as well as City Council, committee, and board meetings. The Town-owned right of way along Walnut Avenue is encumbered with underground infrastructure. The Town has determined that approximately 16 units could be developed on this site. As shown in Table 3.3-7, the 16 units would include seven very-low income and nine low-income units.

Table 3.3-7: Multi-Family Opportunity Sites					
	Unit/Income Category Breakdown**				
Location/Name	VL	L	M	AM	Total Units
Town Hall Campus	7	9	0	0	16
Tobin Clark	44	0	6	50	100
Nueva Private School	0	0	6	0	6
Burlingame Country Club	0	0	5	0	5
Total	51	9	17	50	127
Source: Town of Hillsborough, 2023 – 2031 Housing Element.					

- Tobin Clark: This approximately 21-acre Town-owned site is located in the former Tobin Clark estate in the southeastern part of Town, adjacent to the north side of the College of San Mateo near Tournament Drive, Sugar Hill Drive, and Tobin Clark Drive. The site presents opportunities related to its location next to the College and could provide needed housing for faculty and staff. The Tobin Clark Opportunity Site currently has a General Plan land use designation of Open Space & Conservation and would require redesignation and rezoning to the new mixed residential (R-2) designation.

  Preliminary site review suggests approximately four to six building pads could be developed on the site. Possible configurations would allow for a variety and range of housing units, including smaller, higher density single rooms for students and mid-density townhomes and/or higher density multi-family units for families, faculty, and staff. However, there are identified constraints that would need to be addressed, such as steep slopes and access issues; biological resource concerns related to streams, riparian habitat, and sensitive vegetation types; and uncertain utility connections (sewer and water service). Figure 3.3-7 shows a Conceptual Land Use Plan and Land Cover for the Tobin Clark site.

  Steep slopes/access: The site's steep slopes limit possible access points. A preliminary determination by the Town indicates that of four possible access points, two would not be feasible due to average slopes in excess of 29 percent; a third would be limited by an existing stormwater drainage pipe crossing the property and proximity to the outfall. The fourth has an average slope of 17 percent but could pose utility challenges as described below. This fourth access point would also require approval from the San Mateo County Community College District.



Figure 3.3-7 Conceptual Land Use Plan and Land Cover – Tobin Clark

Biological Resources: The site has six ephemeral streams and is covered by woodlands and chaparral with sensitive vegetation types. Over half of the site (approximately 62 percent) contains sensitive land cover types, with Coast live oak woodland (about 10.6 acres) accounting for approximately 50 percent of the total site area. In addition, six special-status plant species and two special-status wildlife species have potential to occur within the site area. One of these special-status plant species, San Mateo woolly sunflower, is listed as both federal endangered and state endangered, which would mean that consultation with the U.S. Fish and Wildlife Service and the California Department of Fish and Wildlife would be required if on-site. Stream setback and tree removal regulations could constrain development in some areas of the site. In addition to effects on wildlife habitat removal and direct removal of trees, other impacts could result from placement or removal of fill, vegetation removal, equipment access, and erosion/runoff impacts. Direct impacts to sensitive aquatic or terrestrial land cover types may require permits from the regulatory agencies with jurisdiction over that land cover type.

Utilities: Two options exist to provide water and sewer utilities to the Tobin Clark site. The least expensive option would involve utilizing the existing water infrastructure within the College of San Mateo because it would involve the shortest distance for providing water service to the site. Unfortunately, the system is not sufficiently large enough to provide service. Alternatively, Cal Water would appear to be the nearest water supplier, and sewer services could possibly be provided by the City of San Mateo. However, the Town of Hillsborough has explored the concept of extending the Town's water main system to loop through the area, which would then allow use of existing Town facilities. In either scenario, lengthy pipes would need to be installed, but if Town water and sewer services were used, then usage and allocations would be from the Town rather than another water and sewer agency. Additional engineering studies would be required to confirm this and to ensure adequate pressure and emergency flow would be available to the proposed units.

The Town continues to study the site to create solutions to these challenges, and ultimately projects 100 units for the site. As shown in Table 3.3-7, the 100 units would include 44 very-low income, six moderate income, and 50 above-moderate income units.

- Nueva Private School: This private school site is located at 6565 Skyline Boulevard in Hillsborough and contains the main school building plus related athletic and accessory facilities. In a letter of intent sent to the Town, the School reaffirmed its intention to develop six units of housing on the campus, which was considered in 1996 and since included in the School's 2021-2027 plan. The potential housing site would be located along Skyline Boulevard at the front of the parcel as shown in Table 3.3-7, the six units would be moderate income units.
- Burlingame Country Club: This private country club, which includes an 18-hole golf course, is located east of the Nueva School site. The club sent a letter to the Town expressing its intent to evaluate the possibility of developing five housing units for club employees. As shown in Table 3.3-7, the five units would be moderate income units.

3.3.8 Proposed Housing Element Policies, Goals, and Actions

The Housing Element contains policies, goals, and actions to address housing needs in the community, reduce/remove constraints to housing development, identify resources available to address housing needs, and promote equal housing opportunities for all people. Appendix B contains the full text of the proposed policies, goals, and actions of the Housing Element update. The key policies and goals are identified below, along with proposed actions that could result in a physical effect on the environment and therefore would be subject to analysis under CEQA:

- Policy 1: Reduce Barriers to Housing Development
  - Goal 1.1: Allow for increased subdivision opportunities throughout the community.
    - Action 1.1 (a): Continue to implement Senate Bill 9 (SB9), as appropriate. SB 9 allows all properties within a "single-family residential zone" to be subdivided into two parcels and developed with two primary dwelling units per lot, irrespective of local standards.
  - Goal 1.2: Streamline the project review process for housing-related applications.
    - Action 1.2 (d): Utilize CEQA exemptions for infill development sites, to shorten entitlement review time.
  - Goal 1.3: Assist Town residents in the resolution of land use conflicts to promote successful housing development projects.
  - Goal 1.4: Amend the Town's zoning regulations to comply with all recently adopted state legislation.
  - Goal 1.5: Amend the Town's zoning regulations to accommodate a variety of housing types.
    - Action 1.5 (a): Eliminate the minimum required residential structure size.
  - Goal 1.6: Establish an Affordable Housing Impact Fee program and associated Housing Choice Fund.
  - Goal 1.7: Build support for the development of new housing in Hillsborough.
- Policy 2: Promote the Construction and Affordability of Accessory Dwelling Units (ADUs).
  - Goal 2.1: Continue to support and fund the Town ADU Ombudsperson to guide property owners through the Town's ADU development process.
    - Action 2.1 (d): Increase Accessory Dwelling Unit production by encouraging homeowners and developers to include attached or detached Accessory Dwelling Units in existing or new homes.
  - Goal 2.2: Further streamline and expedite the ADU and JADU permitting process.
    - Action 2.2 (c): Incentivize ADUs and JADUs to be constructed along with new single-family detached housing by allowing concurrent permit review and approval and no-cost deed recording with Town notary.
    - Action 2.2 (d): Continue ADU Exception process to allow exceptions for specified zoning standards, such as maximum lot coverage and minimum landscape coverage, to accommodate ADUs and JADUs that do not comply with every applicable standard in Section 17.52.020.
    - Action 2.2 (e): In coordination with the Central County Fire Department and CalFire, establish preapproved fire parameters for ADUs to streamline fire related review.

  - Goal 2.3: Adopt an ordinance to allow up to two detached ADUs on lots two acres and larger.
    - Action 2.3 (c): Present to City Council for consideration and adoption, language allowing a maximum of two detached ADUs on lots two acres and larger.
  - Goal 2.4: Create a program to encourage and expedite the conversion of pool houses, guest houses, and other accessory structures to recorded ADUs/JADUs.
    - Action 2.4 (c): Present to City Council for consideration and adoption, language amending chapter 17.52 (Accessory Dwelling Units) of the Hillsborough Municipal Code expediting the conversion of pool house, guest house, and similar accessory structures into recorded ADUs.
  - Goal 2.5: Require all future pool house, guest house, and similar development to be constructed to the standards of an ADU to accommodate future conversion.
    - Action 2.5 (c): Present to City Council for consideration and adoption, language amending chapter 17.52 (Accessory Dwelling Units) of the Hillsborough Municipal Code to requiring pool house, guest house, and similar accessory structures to be constructed for use as and recorded as an ADU.
  - Goal 2.6: Create a retroactive permitting program for existing, unpermitted ADUs and JADUs.
    - Action 2.6 (a): Establish an ADU/JADU Amnesty Program to allow eligible properties to legalize existing ADUs that were constructed without a permit.
  - Goal 2.7: Via 21 Elements, coordinate with San Mateo County jurisdictions on facilitating ADU Development.
  - Goal 2.8: Conduct an ADU education and outreach campaign.
  - Goal 2.9: Monitor ADU production and utilization and trigger mid-cycle adjustments as needed.
- Policy 3: Facilitate Housing Development on Public, Commercial, Nonprofit, and Institutionally Owned Sites
  - Goal 3.1: Monitor the disposition of all publicly owned land for potential future use for housing development.
  - Goal 3.2: Encourage and support the use of private recreational and private school land for housing development to accommodate housing choice throughout Hillsborough.
    - Action 3.2 (a): In coordination with Nueva private school and the Burlingame Country Club, establish objective design standards, ministerial review and approval procedures, and other criteria for multifamily housing. Provide staff support and community engagement facilitation to support development of multi-family housing units at Nueva private school and the Burlingame Country Club.
  - Goal 3.3: Facilitate the development of housing at the Town Hall Campus.
    - Action 3.3 (a): Refine the recently completed study of the Town Hall Campus site to reflect the 16 units of housing proposed in this Housing Element.
    - Action 3.3 (b): Conduct extensive public outreach to develop a community driven vision for the Town Hall Campus, including the 16 units of housing proposed in this Housing Element.
    - Action 3.3 (c): Using the findings of the refined study referenced in Action 3.3 (a) and community driven visioning process referenced in Action 3.3 (b), develop a comprehensive Town Hall Campus Redevelopment Program to ensure redevelopment of the site via a public-private partnership during the RHNA 6

Cycle. The comprehensive program will include an overview of team structure, available revenues and gaps, approvals required, phasing strategy, and partnership plan.
        - Action 3.3 (d): Amend the zoning for the Town Hall Campus to permit development of housing 'by right' within the time limits required by State law.
        - Action 3.3 (g); Development objective design standards for multi-family housing. These standards will be carefully developed using site modeling, in order to ensure the minimum densities described in this Housing Element.
        - Action 3.3 (h): Complete design review of the proposed development and approve a development and disposition agreement with the proposed developer, including any proposed City assistance. If the property is not exempt surplus property, provide the development and disposition agreement to HCD prior to approval. Ensure that a covenant is recorded as required by the Surplus Lands Act.
    - Goal 3.4: Facilitate the development of housing at the Tobin Clark housing opportunity site.
        - Action 3.4 (d): Amend the zoning for the Tobin Clark property to permit development of housing 'by right' within the time limits required by State law.
        - Action 3.4 (g): Complete design review of the proposed development and approve a development and disposition agreement with the proposed developer, including any proposed City assistance. If the property is not exempt surplus property, provide the development and disposition agreement to HCD prior to approval. Ensure that a covenant is recorded as required by the Surplus Lands Act.
- Policy 4: Ensure Responsible Development in Wildland Urban Interface (WUI) Areas.
    - Goal 4.1: Continue to support the Central County Fire District (CCFD) WUI Home Inspection Program.
    - Goal 4.2: Continue to support community participation in the National Firewise USA® Recognition Program of the National Fire Protection Association (NFPA).
    - Goal 4.3: Establish and enforce safety standards for structures and landscaping in WUI areas.
- Policy 5: Establish and Strengthen Opportunities for Rental Tenancies in ADUs and throughout Hillsborough.
    - Goal 5.1: Add a Tenant/Landlord information page to the Town website.
    - Goal 5.2: Support the Human Investment Project (HIP Housing) Home Sharing, Self-Sufficiency, and Property programs.
    - Goal 5.3: Establish and continue partnerships with local nonprofits for tenant outreach and counseling.
    - Goal 5.4: Adopt an anti-harassment ordinance and a right-to-counsel policy.
- Policy 6: Actively Participate in Addressing the Housing Needs of the Region.
    - Goal 6.1: Continue participation in and support for the 21 Elements project.
    - Goal 6.2: Provide financial support to local housing, homelessness, and mental health support programs.
    - Goal 6.3: Report annually to City Council on the Town's progress in meeting the RHNA Cycle 6 housing allocation.
    - Goal 6.4: Monitor the opportunity sites inventory and the Town's progress in meeting RHNA.

- Policy 7: Affirmatively Further Fair Housing Opportunities.
  - Goal 7.1: Eliminate discrimination in housing based on age, race, color, religion, sex, marital status, national origin, ancestry, or occupation.
  - Goal 7.2: Proactively increase access to affordable housing options for historically marginalized and underrepresented groups.
  - Goal 7.3: Conduct an AFFH Education and Outreach Campaign.

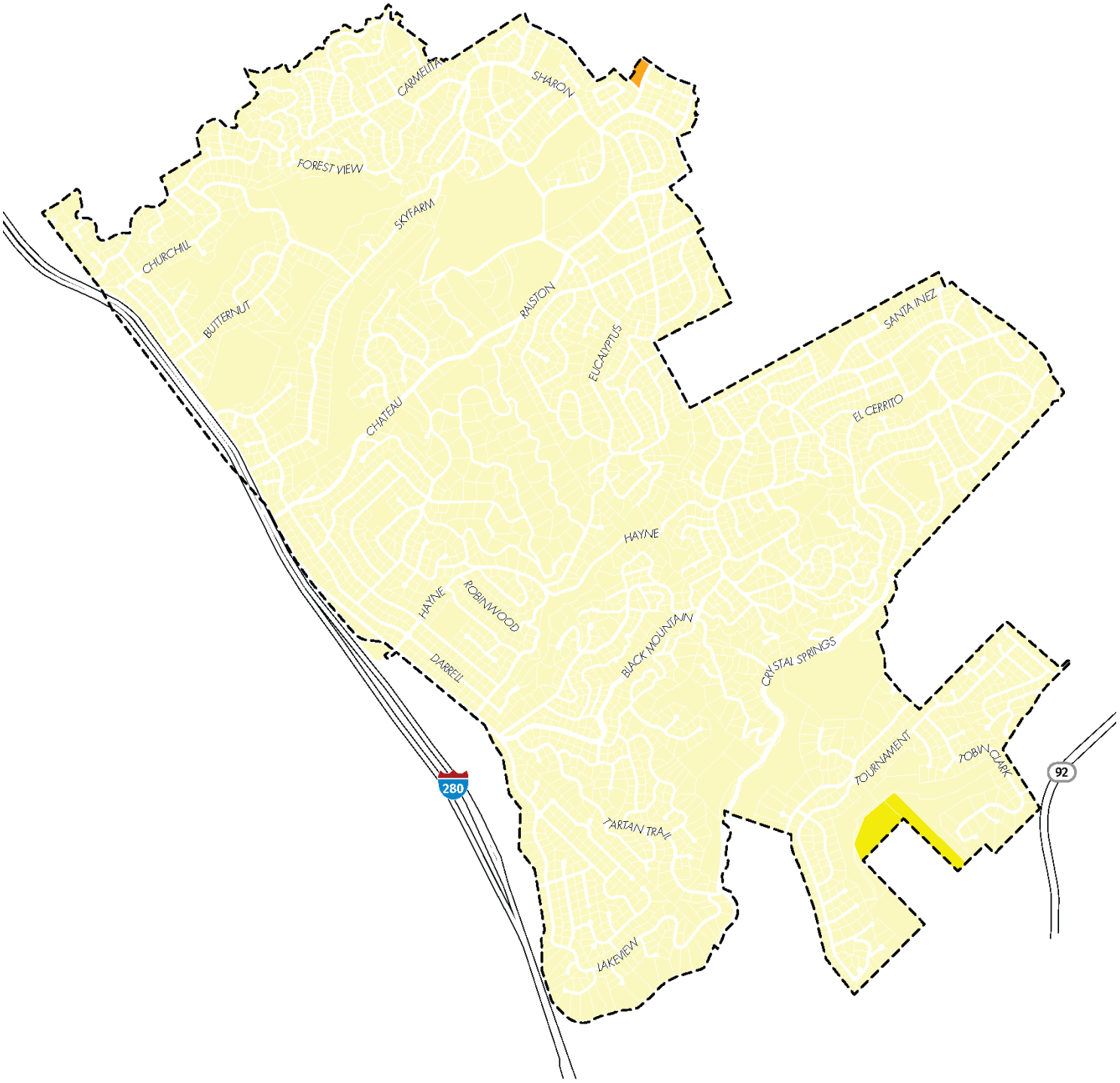
As noted above, the Housing Element Update includes "actions" designed to support and implement the above policies and goals. Most of these approximately 121 actions would not result in a potential physical effect on the environment due to the type of activity proposed. For example: Action 1.2 (c) would continue to evaluate and improve the streamlined processing system to facilitate residential development; Action 1.3 (a) would maintain the Town's contract supporting Peninsula Conflict Resolution Center (PCRC) and refer conflicted parties to PCRC's no-fee mediation services; and Action 1.7 (a) would continue to encourage developers to have neighborhood meetings with residents early in the discretionary land use permit process. These types of activities and many of the others would involve administrative or support functions, or procedural changes, commitments to investigate or secure additional funding, and other related activities that do not call for construction or otherwise directly involve physical effects on the environment.

However, there are 19 actions that could potentially result in physical effects on the environment either because they promote construction of new housing or because they could lead to construction through facilitation of housing development, which necessarily results in physical effects on the environment. These have been included in the above list for reference. For example: Action 1.1 (a) would continue implementation of Senate Bill 9 (allowing two primary dwelling units per lot); Action 1.2 (d) would promote use of CEQA exemptions for infill development sites; Action 2.1 (d) would increase Accessory Dwelling Unit production; and Action 3.3 (c) would develop a comprehensive Town Hall Campus Redevelopment Program. See Appendix B for a full listing of actions.

3.3.9 Land Use Element Update

The Land Use Element would be updated to ensure consistency with the 2023 – 2031 Housing Element Update. This includes updating the General Plan land use designations to describe the new mixed residential and governmental and residential mixed land use designations allowing multi-family residential uses. The General Plan Land Use map would also be updated to reflect these new land use designations (see Figure 3.3-8 Proposed Land Use Map)

The existing General Plan land use designations will be updated to reflect the new land use categories that will allow multi-family uses. The text below shows how the Town proposes to modify the General Plan land use designations. Underlined text indicates new text being added and ~~strikeout~~ text indicates text that is being deleted or modified.



Source: Town of Hillsborough

Proposed Land Use Category

- Traditional Residential
- Mixed Residential
- Governmental and Residential Mixed Use

Figure 3.3-8 Proposed Land Use Map

Town of Hillsborough 6th Cycle Housing Element Update Draft EIR

1. Traditional Residential (R-1)

The Traditional Residential designation is the existing RD-1 district which allows for the development of single-family dwellings in a manner that is consistent with the existing character of the community and subject to all existing development standards. Additional uses that may be allowed include home businesses, ~~second~~ accessory dwelling units, family day care homes and other compatible uses identified in the Hillsborough Municipal Code. The maximum allowed density is one single-family dwelling per ½ acre, exclusive of accessory dwelling units.

2. Mixed Residential (R-2)

The Mixed Residential designation allows for the development of townhomes and multifamily buildings on Town owned land. Additional uses that may be allowed include home businesses, family day care homes, and other compatible uses identified in the Hillsborough Municipal Code. The minimum allowed density is 20 units per acre. Development is approved ministerially and compliance with objective design and development standards is required.

3. Governmental and Residential Mixed Use

The Governmental and Residential Mixed-Use designation allows for the development of Town of Hillsborough facilities as well as limited residential units on Town owned land. A maximum of 16 dwelling units may be accommodated on the land included in this designation. Development is approved ministerially and compliance with objective design and development standards is required.

~~2~~4. Public Facilities And Services

The Public Facilities and Services designation allows for the development and operation of services and facilities that are necessary to meet the community's needs, while maintaining the character of the community. Allowable uses include public schools, governmental facilities, parks and other recreational facilities. The maximum allowed intensity for the existing land currently designated Public Facilities and Services designation is 15 percent above the floor area ratio intensity in existence as of adoption of this General Plan. This allowed increase acknowledges that there may be the need for changes to existing public facilities in the future in order to maintain the high level of public service that Hillsborough residents expect. However, prior to approving an increase in the intensity of development, a study will be completed by the Town to ensure that the increase is kept to the minimum necessary to allow for the continued provision of service. The public will be involved in the planning process to ensure that expansion and change occurs in a manner that is compatible with the character of the Town, while allowing for the continued operation and provision of public services.

Changes in land use designations would be reflected in adjustments to the General Plan Land Use Element "Table LU-1 Summary of Designated Land Uses"; however, because only the proposed multi-family sites would require land use designation changes to parcels designated for other uses, the acreage number changes would be relatively small (on the order of one acre or less, except possibly for the Tobin Clark site) compared to the existing table and would not be adjusted until final acreages have been determined when more specific information for each site development is submitted. For this discussion it is sufficient to acknowledge that generally the

following changes in designated land uses would be anticipated as a result of the Focused GPU: an increase in “Residential”; a decrease in “Public Facilities and Services”; a decrease in “Private Schools”; a decrease in “Open Space and Conservation”; and a decrease in “Private Recreational.” The “Roadways and Other Right of Way” designation would remain as indicated in the General Plan, although it is possible that future adjustments to roadways would be necessary.

3.3.10 Open Space and Conservation Element Update

The Open Space and Conservation Element would be updated to ensure consistency with the Housing Element Update, and includes updates of data and figures as necessary to reflect newer information; revisions to references to Natural Space Resources, including redesignating a portion of the Tobin Clark site from Open Space & Conservation to the new mixed residential (R-2) designation. Additionally, updates would be made as necessary to Table OSC-1 (“Biological Resources With the Potential to Occur in Hillsborough (2004)”); updates to tree removal discussion with consideration whether encouraging removal of specific tree species should remain; and updates as necessary pertaining to water quality to reflect SFPUC’s 2003 Water Quality Report.

In addition, the update includes new action items to implement mitigation measures identified in the Biological Resources chapter of this EIR (Mitigation Measure BIO-1. Project-Specific Biological Resources Evaluation; Mitigation Measure BIO-2. Nesting Birds; Mitigation Measure BIO-3a. Bat Habitat Assessment; Mitigation Measure BIO-3b. Dusk Emergence Bat Survey; and Mitigation Measure BIO-4 – Stream Protection Ordinance).

3.3.11 Public Safety Element Update

The Public Safety Element is updated to ensure consistency with the 2023 – 2031 Housing Element Update, and includes updates to background information to reflect current risks due to natural and man-made hazards (such as wildland and urban fires and emergency preparedness) and updates as necessary to relevant Goals, Policies and Actions; updates, if necessary, to Figure PS-1: Wildland Fire Hazards (2003); updates to discussion on vegetation management to reflect current and future practices and requirements; updates, as necessary, to identified underground storage tanks (UST) within the community used for fuel storage, as well as several above-ground storage tanks; updates, as necessary to San Mateo County Operational Area Emergency Operations Plan (EOC) and the Standardized Emergency Management System (SEMS); and an accuracy check of Government Code references and revisions as necessary.

In addition, the update includes actions items revising Action PS-2.1 and other references to the Town’s Hillside Lot Size Ordinance that limits development on slopes over 10 percent; and action items to implement mitigation measures identified in the Geology and Soils chapter of this EIR (Mitigation Measure GEO-1), Hazards and Hazardous Materials chapter (Mitigation Measure HAZ-1 regarding New Public Safety Policy PS-5.5 and new Public Safety Action PS-5.5), Hydrology and Water Quality chapter (Mitigation Measure HYD-1), and Wildfire chapter (Mitigation Measure WILD-1).

3.3.12 Title 17 (Zoning) and Other Municipal Code Revisions

Amendments to the Town's Zoning Ordinance (Title 17 of the Hillsborough Municipal Code) would be initiated to allow for fulfilment of the Town's RHNA. This includes updating the Zoning Ordinance land use designations to include the new mixed residential and governmental and residential mixed land use designations allowing multi-family residential uses. The Zoning Map would also be updated to reflect these new land use designations (see Figure 3.3-9 Proposed Zoning Map).

The existing Zoning designations will be updated to reflect the new land use categories that will allow multi-family uses. The text below shows how the Town proposes to modify the General Plan land use designations. Underlined text indicates new text being added and strikeout text indicates text that is being deleted or modified.

Zoning District Purpose and Intent Statements

1. Traditional Residential (R-1)

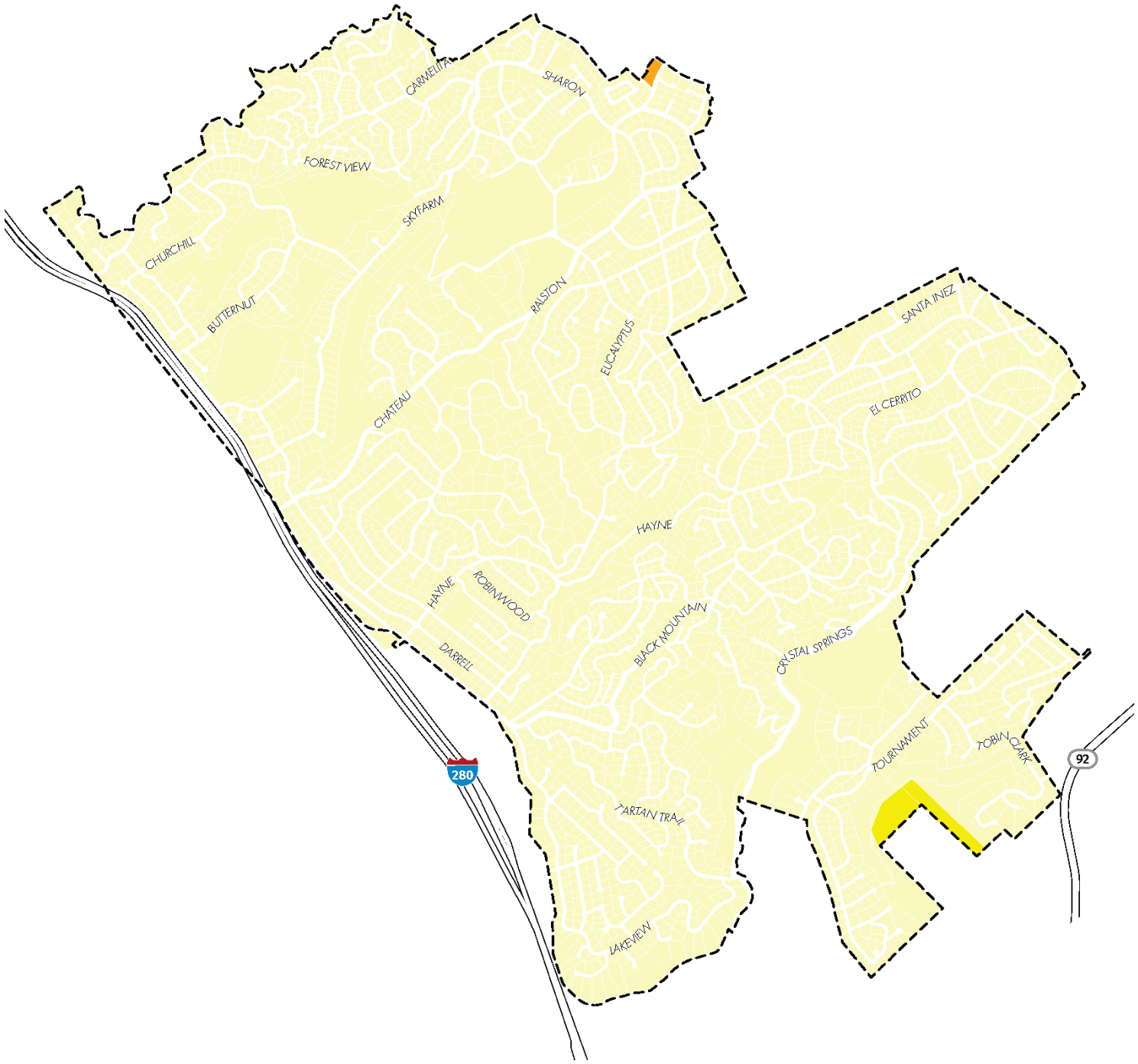
The Traditional Residential district is established to preserve and protect Hillsborough's existing, single family detached neighborhoods. Development shall be consistent with the existing character of the community. The maximum allowed density is one single-family dwelling per ½ acre, exclusive of accessory dwelling units.

2. Mixed Residential (R-2)

The Mixed Residential district is established to accommodate the development of townhomes and multifamily buildings on Town owned land. The minimum allowed density is 20 units per acre. Development is approved ministerially and compliance with objective design and development standards is required.

3. Governmental and Residential Mixed Use

The Governmental and Residential Mixed-Use district is established to accommodate the development of Town of Hillsborough facilities as well as limited residential units on Town owned land. A maximum of 16 dwelling units may be accommodated on the land zoned in this district. Development is approved ministerially and compliance with objective design and development standards is required.



Source: Town of Hillsborough

Proposed Zoning Districts

- Hillsborough Town Limits
- RD-1 Traditional Residential
- RD-2 Mixed Residential
- RD-3 Governmental and Residential Mixed Use

Figure 3.3-9 Proposed Zoning Map

The new, higher density residential use zoning designation would occur at the Town Hall Complex and Tobin Clark sites. The Nueva School site and the Burlingame Country Club site are already permitted to develop multi-family housing within the limits of their existing zoning. No rezoning of these two parcels is needed to implement the Focused GPU.

Other proposed Title 17 Zoning amendments would include changes to the Town's definition of group home to ensure compliance with federal and state fair housing laws and amending the Density Bonus section to ensure compliance with state density bonus law.

The Town is also proposing to conduct a study to determine if revisions are necessary to Title 16 (Subdivisions) of the Hillsborough Municipal Code to facilitate the subdivision and development of additional housing, which would likely require modifying existing subdivision standards pertaining to average slope and minimum lot size.

In addition, other amendments to the Town's Zoning Ordinance are identified in the Housing Element Update, including revisions to:

- Subdivision standards - Action 1.1 (b);
- By-right housing - Action 3.3 (d) and Action 3.4 (d);
- Compliance and/or consistency with federal and state housing laws - Action 1.4 (a), Action 1.4 (b), Action 1.4 (c), Action 1.4 (d), Action 1.4 (e), Action 1.4 (f), and Action 1.4 (g);
- Affordable housing impact fees - Action 1.6 (a);
- ADUs - Action 2.3 (c), Action 2.4 (c), and Action 2.5 (c);
- Anti-harassment/right-to-counsel - Action 5.4 (c);
- Minimum required residential structure size - Action 1.5 (a); and
- Replace "family" with "household" throughout the zoning ordinance - Action 1.5 (b).

3.3.13 Objective Development Standards

As part of adopting the 6th Cycle Housing Element Update, the Town will also prepare Objective Development Standards for multi-family housing development that will establish objective standards for such things as lot coverage, floor area ratio, building height and setback requirements, landscaping, and parking requirements. The Town will ensure that these standards do not impact the ability to achieve the designated minimum densities.

Separate from the EIR, and following a comprehensive community engagement process, the Town will establish Objective Design Standards and landscaping requirements for multi-family housing projects.

3.4 Intended Uses of The Program EIR

Pursuant to Section 15168 of the State CEQA Guidelines, this EIR is a Program EIR. The goals, policies, land use designations, implementation programs, and other substantive components of the General Plan and implementing sections of the Zoning Code and the Municipal Code comprise the "program" evaluated in this Program EIR.

The Town of Hillsborough is the lead agency for the proposed Project. A lead agency, as defined in Section 15367 of the State CEQA Guidelines, is "the public agency that has the principal responsibility for carrying out or approving a project." The Town Council will be the decision-

making body for the Project and will consider certification of the Final EIR and approval of the Focused GPU, and adoption of the 6th Cycle Housing Element (2023 – 2031). In addition, HCD will need to approve the Housing Element update prior to its adoption by the Town.

Actions Covered by this EIR

In addition to adoption of the Focused GPU, this Draft EIR contemplates the following actions as implementing programs and activities. These approvals will be considered and made solely by the Town Council and are the following:

- The 2005 Hillsborough General Plan will be amended to incorporate the updated 6th Cycle Housing Element (2023 – 2031).
- Update the General Plan Land Use map and the Zoning Map to indicate the location of multi-family housing designations.
- Changes to the General Plan and Zoning Code as necessary to Implement “Programs” identified in the Housing Element. Such amendments may include the following:
    - Changes to the land use designations (where needed) to identify multi-family housing locations;
    - Changes to policies and programs to remove barriers to residential development;
    - Changes to the zoning map land use designations (where needed) to accommodate the development intensity needed to satisfy the RHNA; and
    - Zoning text amendments to ensure procedures and standards are in place to support development needed to satisfy the RHNA in compliance with State Law (Objective Development Standards).
    - Amend the Town’s zoning regulations to comply with all recently adopted state legislation regarding group homes, emergency shelters, density bonus requirements, transitional and supportive housing in compliance with Government Code requirements and amend the Town’s parking requirements for development within one-half mile of a major transit stop consistent with Government Code Section Government Code Section 65863.2. (Housing Element Goal 1.4).
    - Modify existing subdivision standards pertaining to average slope and minimum lot size to facilitate the subdivision and development of additional housing in a manner that protects public safety (Housing Element Action 1.1.b)
    - Amend the Town’s zoning regulations to accommodate a variety of housing types by removing minimum residential structure size (Housing Element Goal 1.5)
    - Amend the Town’s zoning regulations to facilitate the construction of ADUs including allowing two ADUs on residential lots two acres or larger (Housing Element Goals 2.1 – 2.9)
    - Amend the zoning for the Town Hall Campus and the Tobin Clark site to permit development of housing ‘by right’ within the time limits required by State law (Action 3.3 (d) and Action 3.4 (d)).
    - Adopt Universal Design Guidelines for multi-family housing sites

As the Lead Agency, the Town intends this Program EIR to serve as the CEQA-required environmental documentation for consideration by other Responsible Agencies and Trustee Agencies (defined the CEQA Guidelines Sections 15381 and 15386) that may have limited discretionary authority over future projects affected by the General Plan. Following certification of this Program EIR and adoption of the General Plan updates by the Town of Hillsborough

(Lead Agency), other agencies may use this Program EIR in the approval of subsequent implementation activities. These agencies may include, but are not limited to those listed below:

Local Agencies

- San Mateo County

Regional and State Agencies

- San Mateo County Local Agency Formation Commission (LAFCO)
- Association of Bay Area Governments (ABAG)
- Bay Area Air Quality Management District (BAAQMD)
- California Department of Conservation
- California Department of Fish and Wildlife (CDFW)
- California Department of Housing and Community Development (HCD)
- California Department of Toxic Substance Control (DTSC)
- California Department of Transportation (Caltrans)
- California Public Utilities Commission
- Metropolitan Transportation Commission (MTC)
- San Francisco Bay Regional Water Quality Control Board (RWQCB)
- Silicon Valley Clean Water (SVCW)

Federal Agencies

- U.S. Army Corps of Engineers (USACE)
- U.S. Fish and Wildlife Services (USFWS)

CHAPTER 4 IMPACT ANALYSIS

This chapter examines the environmental and regulatory setting, evaluates the potential significant environmental impacts, and identifies appropriate mitigation measures for each environmental element discussed in this Draft EIR.

Environmental Elements Analyzed in the EIR

As discussed in Chapter 1, Introduction, the scope of this EIR is based on the input from the public, as well as from responsible and affected agencies through the EIR scoping process. This chapter of the EIR addresses 16 environmental resources that were determined to be potentially significant in the Notice of Preparation and scoping process. These environmental elements are addressed in the following sections:

4.1	Aesthetics	4.9	Hydrology and Water Quality
4.2	Air Quality	4.10	Land Use
4.3	Biological Resources	4.11	Noise
4.4	Cultural and Tribal Cultural Resources	4.12	Population and Housing
4.5	Energy	4.13	Public Services and Recreation
4.6	Geology and Soils	4.14	Transportation
4.7	Greenhouse Gases	4.15	Utilities and Services
4.8	Hazards and Hazardous Materials	4.16	Wildfire

Sections 4.1 through 4.16 provide a detailed discussion of the environmental setting, regulatory setting, methodology and thresholds of significance, impacts associated with the Project, and mitigation measures designed to reduce significant impacts where required:

Environmental Setting - This subsection describes the existing physical environmental conditions in the Planning Area and in the surrounding area, as relevant, at the time the Notice of Preparation was circulated for public comment.

Regulatory Setting - This subsection provides an overview of relevant laws, plans, policies, and regulations that compose the regulatory framework for the Project.

Significance Thresholds - This subsection includes the recommended Initial Study Checklist questions from Appendix G of the CEQA Guidelines, along with any other relevant regulatory standards against which to measure the Project's impacts**.**

Impacts and Mitigation - Each section in Chapter 4 includes an evaluation of the direct and reasonably foreseeable indirect impacts associated with implementation of the Project. Under CEQA, the significance of the impact needs to be described. A significant impact on the environment is defined as a substantial, or potentially substantial, adverse change in the environment (Public Resources Code Section 21068). The impact findings used in this document are as follows.

- **No Impact.** This impact would cause no discernible change in the environment as measured by the applicable significance criteria; therefore, no mitigation would be required.
- **Less than Significant.** This impact would cause no substantial adverse change in the environment as measured by the applicable significance criteria; therefore, no mitigation would be required.
- **Significant.** This impact would cause a substantial adverse change in the physical conditions of the environment. Impacts determined to be significant based on the applicable significance criteria fall into two categories: (1) those impacts for which there is feasible mitigation available that would avoid or reduce the environmental impacts to less than significant, and (2) those impacts for which there is either no feasible mitigation available or for which, even with implementation of feasible mitigation measures, there would remain a significant impact on the environment. Those impacts that cannot be reduced to a less than significant by mitigation are identified as significant and unavoidable.
- **Significant and Unavoidable.** This impact would cause a substantial adverse change in the environment and cannot be avoided or mitigated to a less-than-significant level if the Project is implemented. Even if the impact finding is still considered significant with the application of mitigation, the applicant or implementing agency is obligated to incorporate all feasible measures to reduce the severity of the impact.

Mitigation measures are proposed in this EIR to meet CEQA's specific requirement that, whenever possible, agency decision-makers adopt feasible mitigation to reduce a project's significant impacts to a less-than-significant level. The term mitigation denotes measures required to reduce residual environmental impacts after considering the application of all policies and actions set forth in the Focused GPU.

CEQA Baseline

An EIR assesses the significance of a project's impacts in comparison to baseline environmental conditions, consisting of the existing physical environmental conditions at or near a project site. As stated in the State CEQA Guidelines, Section 15125(a), CEQA provides that the existing environmental setting at the time of publication of the Notice of Preparation establishes the baseline for determining whether a project's environmental impacts may be significant. The Town of Hillsborough published the Notice of Preparation for the Project on June 9, 2023.

4.1 Aesthetics

4.1.1 Environmental Setting

The Town of Hillsborough encompasses approximately 6.23 square miles, nearly all of which are developed with residential urban land uses. Hillsborough's Sphere of Influence (SOI) includes three areas of unincorporated San Mateo County:

- Unincorporated land east of I-280 between the Town limit and the City of Burlingame, in the north;
- The San Francisco Public Utilities Commission (SFPUC) parcel located along Hillsborough's western boundary, between I-280 and Black Mountain Road; and
- Unincorporated land east of I-280 between the Town limit and the City of San Mateo in the south.

Scenic Resources

Scenic vistas are defined in this document as natural landscapes that provide views of unique flora, geologic, or other natural features that are generally free from urban intrusions. Typical scenic vistas include views of mountains and hills, large, uninterrupted open spaces, and natural waterbodies. Scenic vistas generally play a large role in the way a community defines itself and also affects development patterns as projects are designed to take advantage of scenic viewsheds. Scenic vistas can be impacted by development in two ways. First, a structure may be constructed that blocks the view of the vista from public vantage points. Second, the vista itself may be altered (i.e., development on a scenic hillside).

The Planning Area has hilly topography and includes areas with steep slopes and narrow ravines, with elevations ranging from approximately 20 to 30 feet mean sea level (MSL) in the east (near El Camino Real) rising to approximately 600 to 700 feet MSL in the west (near I-280). The existing visual character of the Planning Area is residential in nature, with most land uses consisting of single-family homes situated on large, extensively landscaped, or naturally vegetated lots. The Planning Area also contains several relatively small parks and large privately owned undeveloped areas with dense tree cover that contribute to its overall visual character.

The Town does not have any formally recognized scenic vistas identified in the General Plan or other Town planning documents, but residents enjoy and highly value views of San Francisco Bay on the eastern side of the Town and the Santa Cruz Mountains west of the Town. Ridgelines within the Planning Area also provide scenic value to the landscape. The General Plan Open Space and Conservation Element notes that existing trees contribute to the visual appearance of the Town and are enjoyed by the public.

State Scenic Highways

Junipero Serra Freeway (Interstate 280). This State freeway is a designated State Scenic Highway under the State Scenic Highway Program managed by Caltrans from the San Mateo–Santa Clara county line to the San Bruno city limits. Officially designated State Scenic Highways are a substantial section of highway passing through a "memorable landscape" with no "visual

intrusions", where the potential designation has gained popular favor with the community. Interstate 280 (I-280) extends the entire length of San Mateo County from Daly City to Menlo Park (28.5 miles), traversing the foothills of the San Francisco Peninsula between San Francisco and San Jose. The freeway was designed to blend with its natural surroundings and two of its bridges have won national awards for excellence in design. It runs immediately west of the Hillsborough town limits. Sweeping panoramic views of the Bay and of the undeveloped hillsides to the west are visible from vista points adjacent to the roadway. Due to the intervening topography and vegetation, the freeway is not directly visible from most locations within the Town limits. Views of the Town from the freeway are largely obscured by vegetation and topography, though in some locations where vegetation is low in height or sparse, residences and local streets, such as portions of Skyline Boulevard near Butternut Drive, are visible from the freeway. Views of I-280 are visible from some residences near the freeway, including residences along Berryessa Way, Lakeview Drive, and other local streets in the hills along the western Town boundary.

San Mateo County Scenic Corridors

The closest County Scenic Corridor within the vicinity of the Planning Area, Skyline Boulevard, is located west of and parallel to I-280. The northern beginning of Skyline Boulevard starts by the Crystal Springs Golf Course and the Caltrans Park and Ride lot at the end of Hayne Road. Skyline Boulevard travels south, parallel to I-280 until its junction with Hwy 92. Views of the Planning Area from Skyline Boulevard would be limited to the western edges of Town which are heavily screened by trees.

Town Scenic Roads

The Hillsborough General Plan does not contain provisions for scenic roads/corridors, nor does it designate any scenic roads/corridors.

Light and Glare

The Planning Area is primarily urbanized, with routine sources of existing nighttime light and glare, including streetlights along roadways, parking lots, lighted recreation facilities, and residential and non-residential buildings. Residential structures containing glass, metal, or polished exteriors or roofing materials throughout the Planning Area also reflect the natural sunlight that create localized sun glare when the sun is low on the horizon.

General light pollution is created by the developed uses in the Planning Area. Light pollution also is referred to as “sky glow,” is a result of outdoor lighting that is directed to or reflected in the sky. Light pollution creates a visual haze of light that obscures dark night-sky views of celestial bodies.

4.1.2 Regulatory Setting

State

California Streets and Highways Code (Section 260)

This code preserves and protects scenic highway corridors from changes that would diminish the aesthetic value of lands adjacent to highways. A California highway may be designated as a scenic highway depending on how much of the natural landscape can be seen by travelers, the scenic quality of the landscape, and the extent to which development intrudes on the traveler's enjoyment of the view. When a city (or county) nominates an eligible scenic highway for official designation, it must identify and define the scenic corridor of the highway, as defined by the motorist's line of vision (a reasonable boundary is selected when the view extends to a distant horizon). The city (or county) must also adopt ordinances to preserve the scenic quality of the corridor, including: 1) regulation of land use and density of development; 2) detailed land and site planning; 3) control of outdoor advertising (including a ban on billboards); 4) careful attention to and control of earthmoving and landscaping; and 5) careful attention to design and appearance of structures and equipment. There are no designated State scenic highways within the Town of Hillsborough; however, I-280 immediately west of the Town is a designated State Scenic Highway from the San Mateo–Santa Clara county line to the San Bruno city limits. The next nearest Scenic Highway is State Route 35, an eligible State Scenic Highway located west of and parallel to I-280.

Title 24: Building Energy Efficiency Standards

In 2001, the California Legislature passed a bill requiring the California Energy Commission (CEC) to adopt energy efficient standards for outdoor lighting for both the public and private sector. In November 2003, the CEC adopted changes to the Building Energy Efficient Standards within Title 24. These standards became effective on October 1, 2005, and specify outdoor lighting requirements for residential and nonresidential development. The intent of the new standards is to improve the quality of outdoor lighting and help reduce the impacts of light pollution, light trespass, and glare. The standards regulate lighting characteristics, such as maximum power and brightness, shielding, and sensor controls to turn lighting on and off. Different lighting standards are set by classifying areas by lighting zone. The classification is based on population figures in the 2003 Census and the areas can be designated as LZ1 (dark), LZ2 (low), LZ3 (medium), or LZ4 (high). Lighting requirements for dark and rural areas are stricter to protect the areas from new sources of light pollution and light trespass. According to the U.S. Census Bureau, the entire Planning Area is defined as an urban area and is therefore designated as LZ3 per the CEC classification standards.

Local

Hillsborough Residential Design Guidelines

The Town's Residential Design Guidelines were most recently comprehensively updated in 2004 and amended in 2006. The Residential Design Guidelines provides guidelines and design direction that homeowners and their architects are directed to reference in the preparation of building and landscaping plans. Guidelines and design directions contained therein relate to architectural styles, site planning, hillside development, massing, materials and finishes,

facades, roofs, windows, doors, landscape design, lighting, and more. It should be noted that the Town's Residential Design Guidelines currently apply only to the design of single-family residential dwellings. The Residential Design Guidelines do not contain design guidelines for multi-family residential dwellings.

Hillsborough General Plan

The Land Use Element of the Town's General Plan contains goals, policies, and actions to protect scenic and visual resources. Relevant goals, policies and actions include:

Goal LU-1 - Provide for the preservation and enhancement of the Town's unique residential character.

Policy LU-1.1 - Maintain the character of the Town's neighborhoods.

Policy LU-1.2 - Promote property and landscape improvements and maintenance.

Policy LU-1.3 - Support the work of organizations to preserve and enhance the visual character of Hillsborough.

Policy LU-1.4 - Ensure that lighting on private and public property is designed to avoid illuminating adjacent properties and public right-of-ways and does not contribute to an overall increase in the ambient lighting level of the community.

Policy LU-1.5 - Review Town regulations, including the Municipal Code and Residential Design Guidelines, on a regular basis to ensure that development within the Town occurs in a manner compatible with the Town's character.

Action LU-1.1 - The Architecture and Design Review Board will apply the Hillsborough Residential Design Guidelines when reviewing new construction and significant remodeling. The goals of the Guidelines include:

- Reinforcing Hillsborough's image
- Facilitating contemporary life
- Encouraging town-wide diversity
- Fostering creativity

Action LU-1.2 - The Town will enforce its Residential Landscaping requirements to maintain the attractive visual character of Hillsborough, as well as to promote water conservation.

Action LU-1.3 - The Town will enforce its Nuisance Ordinance, which allows for the clean-up of overgrown properties that pose a safety hazard or create a visual nuisance inconsistent with the character of Hillsborough.

Goal LU-2 - Provide for orderly development in a manner compatible with the existing character of Hillsborough.

Policy LU-2.4 - Ensure that construction projects are completed in a timely manner with minimal impact on surrounding residences, including minimizing the visual impacts related to the on-site location of sanitary facilities, construction materials and debris, and recycling materials.

Hillsborough Municipal Code

Town of Hillsborough Municipal Code Section 2.12.070 (Design review process) describes the City's design review process.

The following chapters of the Municipal Code contain additional relevant provisions pertaining to aesthetics and scenic resources:

Chapter 14.04 Tree Removal

Chapter 14.04 Tree Removal of the Municipal Code establishes regulations for the removal of trees to preserve scenic beauty, prevent erosion of soil, protect against flood hazards and the risk of landslides, counteract the pollutants in the air, maintain the climatic balance and decrease wind velocities, and relieve the public of cost of installing and maintaining stormwater drainage systems in the Town. Section 14.04.030 (Procedure – In subdivisions) contains tree removal permit requirements, including replanting requirements, for lots created by subdivision. Section 14.04.040 (Procedure – Improved land other than subdivisions) contains tree removal permit requirements, including replanting requirements, for lots that have previously been improved except for lots created by subdivision. Section 14.04.050 (Procedure – Unimproved land other than subdivisions) contains tree removal permit requirements, including replanting requirements, for vacant, unimproved lots that were not created by subdivision.

Section 17.56.030 - Landscaping—Required.

Section 17.56.030 requires that all developed property shall be landscaped. In the event all or part of a lot has never been graded or planted, that portion of the lot may be retained in its natural state, if appropriately maintained. Appropriate maintenance of the natural state shall include, but not necessarily be limited to, removing dead, dying, or other hazardous trees or other vegetation, and otherwise pruning, thinning, and maintaining the natural vegetation to ensure fire safety and to ensure compliance otherwise with the purposes of this chapter. Landscaping, as defined in Municipal Code Section 17.56.020, includes the installation or construction of lighting fixtures.

Section 17.56.050 - Landscaping projects subject to review and permitting.

Section 17.56.050 establishes the types of landscaping projects subject to review and permitting. Landscaping projects subject to the Town's review and permit procedures include:

A. Removing a tree that has a trunk (or multiple trunks) with a total diameter of thirty-six inches or more measured at four feet, six inches above natural grade. (Such tree removal shall also comply with Title 14 (Trees).

B. Adding or moving fifty cubic yards or more of dirt or soil.

C. Rehabilitating more than ten thousand square feet of landscaped area.

D. Installing landscaping for a residence being newly constructed (either on a previously unimproved lot or on a lot whose previous residence has been torn down).

E. Synthetic grass in areas visible from the public right-of-way.

Section 17.56.060 – Design review.

Section 17.56.060 requires qualifying landscaping projects to obtain design review approval. Project applicants must obtain design review approval of landscaping plans prior to the issuance of any building permit for the construction, reconstruction, or remodel of any structure being built in connection with the installation of the landscaping.

Section 17.56.070 - Permit(s) for landscaping.

Section 17.56.070 provides the Town's procedure for reviewing landscaping projects and issuing permits for said projects. After securing design review approval as set forth in Section 17.56.060 (Design review), a project applicant shall file a written application with the building department to obtain the design of the landscaping. If Section 17.56.040 (Water conservation) is applicable to the landscaping plan, the application for permit(s) shall also include an irrigation system plan that provides for efficient use of irrigation by grouping high water use plants together. Approved landscape permits associated with construction projects subject to a building permit are required prior to the granting of a final approval on a construction permit. When a permit for removal is issued the entire tree must be removed to within twelve inches of grade.

Chapter 12.12 - Outdoor Fixtures

Chapter 12.12 of the Hillsborough Municipal Code contains standards for outdoor fixtures, including any wall (excluding any retaining wall eighteen inches or less in height), utility box, fence, gate, column, pillar, post, flagpole, light post or similar lighting fixture (excluding any standard mailbox), either freestanding or incorporated into a fence or wall.

According to Section 12.12.040 (Design review), any outdoor fixture located or to be located within a right-of way; any outdoor fixture located or to be located within a setback that abuts a public street; and any outdoor fixture over six feet in height regardless of location is subject to the Town's design review process (Municipal Code Section 2.12.070). Chapter 12.12 contains additional requirements for outdoor lighting fixtures, including:

- The minimum distance between gate posts, light posts, other posts, pillars, columns, walls or fences located on either side of a driveway shall be fourteen feet, unless otherwise approved by the Central County Fire for emergency vehicle access and other safety-related purposes.

- The maximum height limit of any outdoor fixture (whether new or existing/to be modified) located within the right-of-way or within the setback area which abuts a public street is eight feet above existing grade at the property line or the pavement grade of the street, whichever is higher.

Title 16 - Subdivisions

Title 16 Subdivisions establishes that all new subdivisions shall provide a system of electroliers or street lighting equipment but only if and to the extent required by the city council upon the advice of the city engineer (Section 16.28.020 – Improvements specifically).

Chapter 17.54 (Two-Unit Projects), Chapter 17.52 (Accessory Dwelling Units and Junior Accessory Dwelling Units), and Chapter 16.44 (Urban Lot Splits)

As established in Section 17.54.050 F.8.c (two-unit projects) and Section 16.44.050 J.7.c. (urban lot splits), all exterior lighting installed by two-unit and urban lot split projects must be limited to down-lights. According to Section 17.52.020 E.10.b), the exterior lighting of ADUs and JADUs must be limited to down-lights or as otherwise required by the building or fire code.

4.1.3 Thresholds of Significance

Potential impacts to aesthetics were determined in accordance with Appendix G of the CEQA Guidelines. Impacts would be considered potentially significant if the proposed Project will:

A. Have a substantial adverse effect on a scenic vista.

B. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.

C. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings. (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, conflict with applicable zoning and other regulations governing scenic quality.

D. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Note: Future residential development projects located within designated Transit Priority Areas[19] or that are otherwise considered to be ministerial projects would not need to evaluate aesthetics for purposes of CEQA impacts (Public Resources Code Section 21099 (d)(1)), although they would remain subject to the Town's architectural review requirements as specified in the Town of Hillsborough Municipal Code Section 2.12.070, listed above. Ministerial projects could include all ADUs and the 23 single-family homes proposed under Housing Element Approach 3.

4.1.4 Impacts and Mitigation Measures

Impact AES-1 – Effects on Scenic Vistas. *[Threshold of Significance (a)]*

CEQA does not establish the definition of a scenic vista. Communities can define and identify scenic vistas in a general plan or afford protection to scenic vistas through other land use planning documents. The Hillsborough General Plan does not discuss or identify any officially designated scenic vistas within the Town, but for the purposes of this CEQA document, a scenic vista is defined as a highly valued landscape that the public can view from public vantage points. A viewpoint that is accessible only from private property is not considered a scenic vista.

The Hillsborough hills in the central and western portions of Town are in a developed hillside setting that is visible from the lower elevations in Hillsborough and along the El Camino Real and US 101, as well as from neighboring cities (i.e., Millbrae, Burlingame, and San Mateo).

[19] Transit Priority Areas are areas within one-half 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.

Although the area is developed, the hills in Hillsborough still comprise a visually pleasing backdrop to broad community views because of the varying topography, mature vegetation, and low-density development that is visible from a distance. Further, development in Hillsborough consists almost exclusively of single-family residential uses on 0.5-acre minimum lots, and the residential lots in the Town tend to be heavily landscaped, creating visually appealing lots with ample vegetation.

The Town does not have any formally recognized scenic vistas but residents enjoy and highly value views of San Francisco Bay on the eastern side of the Town and the Santa Cruz Mountains west of the Town. While the General Plan does not provide a description of scenic vistas or scenic resources in the Town, the views of the San Francisco Bay largely visible from some, but not all, higher elevation locations in the Hillsborough hills and the views of the Santa Cruz Mountains provided from parts of the Planning Area can be considered views of scenic vistas, as these geographical features form a significant part of the scenic backdrop of the Planning Area and the larger region. The Hillsborough hills themselves can also be considered a scenic vista visible from some parts of the Planning Area, though views from parts of the Town with flatter topography may be partially obstructed by intervening buildings and structures.

Residential development projects that may be facilitated by implementation of the Project could change the visual quality of currently vacant, undeveloped land. Redevelopment projects could change the visual character of existing developed sites, particularly if said redevelopment increases the density of on-site uses, incorporates design features that are incompatible with the surrounding neighborhoods and environment, or does not incorporate adequate screening. However, the visual impacts, if any, of the somewhat more intensive and higher density uses that may be facilitated by the Project on scenic vistas would be minimal given that these views of the San Francisco Bay, Santa Cruz Mountains, and Hillsborough hills are already affected by the existing built environment, and the Town is already largely built out.

Additionally, except for the Tobin Clark site discussed below, the housing development that may occur through the implementation of the Project would not significantly contrast in visual character with the surrounding existing (largely residential) uses in the Planning Area. All new single-family development that may be facilitated by the Project would be required to comply with the Town's Residential Design Guidelines and is subject to review and approval by the Town's Architecture Design and Review Board per Municipal Code Section 2.12.070 (Design review process). New ADUs would be required to comply with the Municipal Code's objective standards for size, height, and setback requirements ("Building-permit Only" ADUs) or size, height, setback, lot coverage, architecture, and landscaping ("ADU Planning Permit" ADUs). New multi-family development would be subject to the Town's anticipated Objective Design Standards, which will be created through community input to ensure the architectural detail and massing of new multi-family buildings is consistent with and complementary to the character of the Town and surrounding buildings.

As such, the potential development of the Draft 2023 – 2031 Housing Element Housing Opportunity Sites would not substantially alter the overall views of the San Francisco Bay, Santa Cruz Mountains, and Hillsborough hills. Potential Focused GPU impacts with respect to scenic vistas would be ***less than significant.***

Impact AES-2 – Impacts on State Scenic Highway Resources. *[Threshold of Significance (b)]*

There are no designated state scenic highways within the Town limits. However, I-280, an officially designated State Scenic Highway borders the Town immediately to the west. Only limited views of neighborhoods within the Town are provided via I-280 because of the topography and dense tree cover. The Nueva Private School Housing Opportunity Site would be located directly off Skyline Boulevard and may be visible from I-280. ADUs may be constructed on lots visible from I-280; however, due to the maximum size and height requirements for ADUs outlined in the Hillsborough Municipal Code Section 17.52.020, ADUs would likely not be readily visible from I-280. In the case an ADU is constructed in such a way that it is visible from I-280, the relatively smaller mass of an ADU in comparison to surrounding single-family residential buildings would ensure the ADU does not significantly contrast with the surrounding environment when viewed from I-280.

The Nueva Private School Housing Opportunity Site, if developed, would be developed according to the Nueva Private School's 1996 Master Plan. The 1996 Master Plan for the housing site includes a proposed ten-foot-high sound wall and new trees between the proposed housing and Skyline Boulevard, which would effectively screen the new housing from view from Skyline Boulevard and I-280.

The remaining Housing Opportunity Sites identified in the Draft 2023 – 2031 Housing Element would not likely be visible from I-280 due to physical distance and intervening topography and existing structures. Further, much of the length of I-280 that borders the Town is planted with trees that screen existing views of the Town. New development that may occur in those lengths of I-280 that are not screened with existing trees and vegetation would not likely be readily noticeable as a substantial change in the existing landscape by motorists driving vehicles at relatively high speeds.

For these reasons and the required conformance of new residential development with the Land Use Element goals, polices, and actions listed in Section 4.1.2 relating to the protection of visual resources, and with the Town's Municipal Code requirements for tree removal, landscaping, and exterior lighting, the Project would not substantially damage scenic resources within a State scenic highway, and this impact would be ***less than significant.***

Impact AES-3 – Impacts on Existing Visual Character and Quality. *[Threshold of Significance (c)]*

While the General Plan does not provide a description of scenic resources in the Town, the Town contains hillsides and forested ridgelines that create a visually appealing landscape enjoyed by the public as a whole. The Hillsborough hills, which are located throughout the central and western portions of the Town, could therefore be considered a scenic resource.

As included above in section 4.1.2 Regulatory Setting, the Hillsborough General Plan contains goals and policies related to aesthetics and visual quality. The existing goals, policies, and actions most relevant to reducing potential scenic resources impacts of the proposed Project include:

Goal LU-1 - Provide for the preservation and enhancement of the Town's unique residential character.

Policy LU-1.1 - Maintain the character of the Town's neighborhoods.

Policy LU-1.2 - Promote property and landscape improvements and maintenance.

Policy LU-1.4 - Ensure that lighting on private and public property is designed to avoid illuminating adjacent properties and public right-of-ways and does not contribute to an overall increase in the ambient lighting level of the community.

Policy LU-1.5 - Review Town regulations, including the Municipal Code and Residential Design Guidelines, on a regular basis to ensure that development within the Town occurs in a manner compatible with the Town's character.

Action LU-1.1 - The Architecture and Design Review Board will apply the Hillsborough Residential Design Guidelines when reviewing new construction and significant remodeling. The goals of the Guidelines include:

- Reinforcing Hillsborough's image
- Facilitating contemporary life
- Encouraging town-wide diversity
- Fostering creativity

Action LU-1.2 - The Town will enforce its Residential Landscaping requirements to maintain the attractive visual character of Hillsborough, as well as to promote water conservation.

Additional protection is provided by the Hillsborough Municipal Code Section 2.12.070, which contains specific criteria of the Town's design review process to ensure that new and modified uses and development will be compatible with the existing and potential development of the surrounding area.

The design review process is intended to regulate the design of new and remodeled buildings to ensure that new development supports the General Plan goal of preserving and enhancing the Town's unique residential character and the goal of the Town's Architecture and Design Review Board, which is to encourage design that is responsive to the site, compatible with the surrounding neighborhood, in harmony with the natural environment, and in keeping with the character of the Town. Specific design review criteria are currently contained within the Town's Residential Design Guidelines (Town of Hillsborough 2004). The Town's existing design review process and Residential Design Guidelines would help reduce the scenic resources impacts associated with the potential development of the Draft 2023 – 2031 Housing Element Subdivision/Lot Split Opportunity Sites, the Vacant Opportunity Sites, and Accessory Dwelling Units, as described in the following section.

However, because multi-family housing is not an existing allowed use, the Town's existing Residential Design Guidelines do not contain design guidelines or criteria for multi-family housing development, nor do they contain design criteria related to reducing the potential visual impacts that most often accompany new multi-family residential development. These criteria often include; employing strategies to reduce the visual effects of large building massing, particularly in areas containing predominantly single-family residential development, minimizing glare from the increased number of glass windows and doors in multi-family buildings,

minimizing the escape of potentially increased amounts of light from multi-family buildings and landscaping fixtures into the surrounding environment and night sky, and replacing the increased amount of vegetation removed to create relatively larger buildings associated with multi-family development.

The development of the Nueva School Opportunity Site, Burlingame Country Club Opportunity Site, and Town Hall Complex Opportunity Site would not require new design standards beyond existing requirements to reduce potential significant impacts due to their development being accounted for in the current General Plan and Municipal Code (the Nueva School and Burlingame Country Club Sites), as further discussed below, or recent State law has determined development along certain high density transportation corridors would not constitute a significant aesthetic impact (the Town Hall Complex Site).

The development of the Tobin Clark Opportunity Site, however, may have potentially significant scenic resources impacts for the reasons described in the following section.

Subdivision/Lot Split Opportunity Sites

2260 Redington Road Opportunity Site

The 2260 Redington Subdivision/Lot Split Opportunity Site, if approved, would be developed with up to 35 single-family dwelling units with the potential for ADUs on each subdivided lot. The 2260 Redington Road site is 49.52 acres in size, largely undeveloped, though not vacant, and is heavily vegetated. Several existing buildings and associated amenities are located centrally within the existing parcel. The development proposal for this site involves constructing new housing in undeveloped areas of the site surrounding the existing buildings. Subdivision and development of this site would likely involve substantial grading and vegetation removal, which may constitute a potentially significant visual impact. However, the 2260 Redington Road site is not located on or near a readily visible hillside or ridgeline and so not in an area of particular scenic value. Further, the development of any of the 35 subdivided lots would be required to comply with the Town's stringent landscaping requirements contained within Municipal Code Section 17.56.030 (Landscaping—Required) and Section 17.56.050 (Landscaping projects subject to review and permitting) and the Town's tree removal replanting requirements for subdivisions contained within Section 14.04.030 (Procedure – In subdivisions), which would help reduce impacts related to any tree removal that may be required for construction of new residences. Lastly, the 2260 Redington Road site is located in an existing single-family residential neighborhood. The addition of up to 35 new single-family dwelling units and potential ADU units would be compatible with the surrounding land uses, and all new potential dwellings would be subject to the Town's design review process, which would ensure visual impacts would be less than significant.

50 Brooke Court Opportunity Site

The 50 Brooke Court Opportunity Site would subdivide an 11.64-acre parcel into three single-family residential parcels at the end of Brooke Court adjacent to the College of San Mateo. The visual character of the 50 Brooke Court site is defined by the surrounding heavily vegetated hillside interspersed with houses to the west and south. The site's surroundings represent a built environment with single-family homes visible on a heavily vegetated hillside.

The 50 Brooke Court site is constrained by moderate to steep slopes, and development of this site would likely require grading, though the extent of grading that would be required is currently not known because there is no proposed site plan for the development. Grading and associated vegetation removal could result in potentially significance visual impacts to the existing hillside. However, the development of any of the three subdivided lots, if proposed, would be subject to a project-specific development review process, including review under CEQA, to comply with the Town's Residential Design Guidelines as well as Municipal Code sections pertaining to grading (Chapter 15.24 Grading) landscaping and replanting (Section 17.56.030 (Landscaping—Required), Section 17.56.050 (Landscaping projects subject to review and permitting), and Section 14.04.030 (Procedure – In subdivisions)), and outdoor fixtures (Chapter 12.12 Outdoor Fixtures). Compliance with existing Town regulations and procedures would reduce impacts related to grading and any tree removal that may be required for construction of any new residences. Lastly, the 50 Brooke Court site is located in an existing single-family residential neighborhood. The addition of up to three new single-family dwelling units and potential ADU units in an area already disturbed by hillside residential development would be compatible with the surrounding land uses and as discussed previously, all new potential dwellings would be subject to the Town's design review process, which would ensure visual impacts would be less than significant.

Hayne Road Opportunity Site

The Hayne Road Opportunity Site would subdivide a 10.90-acre parcel into five single-family residential parcels. The visual character of the Hayne Road site is defined by the surrounding heavily vegetated hillsides interspersed with houses in all directions. The site's surroundings represent a built environment with single-family homes visible on heavily vegetated hillsides.

The Hayne Road site is constrained by steep wooded slopes, and development of this site would likely require grading, though the extent of grading that would be required is currently not known because there is no proposed site plan for the development. Grading and associated vegetation removal could result in potentially significance visual impacts to the existing hillside. However, the development of any of the five subdivided lots, if proposed, would be subject to a project-specific development review process, including review under CEQA, to comply with the Town's Residential Design Guidelines as well as Municipal Code sections pertaining to grading (Chapter 15.24 Grading) landscaping and replanting (Section 17.56.030 (Landscaping—Required), Section 17.56.050 (Landscaping projects subject to review and permitting), and Section 14.04.030 (Procedure – In subdivisions)), and outdoor fixtures (Chapter 12.12 Outdoor Fixtures). Compliance with existing Town regulations and procedures would reduce impacts related to grading and any tree removal that may be required for construction of any new residences. Lastly, the Hayne Road site is located in an existing single-family residential neighborhood. The addition of up to five new single-family dwelling units and potential ADU units in an area already disturbed by hillside residential development would be compatible with the surrounding land uses and as discussed previously, all new potential dwellings would be subject to the Town's design review process, which would ensure visual impacts would be less than significant.

Vacant Opportunity Sites

The proposed Housing Opportunity Sites that are not currently accompanied by development proposals or conceptual plans, including the Vacant Opportunity Sites, may potentially be located on sites with scenic resources that may be impacted by new development or redevelopment. As described in the Draft 2023 – 2031 Housing Element, each of the 23 Vacant Opportunity Sites meets the Town's current zoning and subdivision standards, and each site is intended for single-family residential development. Development of any of the Vacant Opportunity Sites, if proposed, would be subject to a project-specific development review process, including the Town's discretionary design review process contained within Municipal Code Section 2.12.070 (Design review process) and would require approval by the Architecture and Design Review Board. The Town's existing design review process for single-family homes would reduce potentially significant scenic resources impacts of the development of any of the Vacant Opportunity Sites to less than significant.

Accessory Dwelling Units

Per Hillsborough Municipal Code (HMC) Section 17.52.020, proposed ADUs either qualify for "Building-permit Only" review and approval or require an "ADU Planning Permit". As per State Law, ADUs are not subject to review by the Town's Architecture and Design Review Board and must be acted upon ministerially as required by Government Code Section 65852.2. Therefore, new ADUs are not subject to the design review and process that applies to new single-family dwelling units. However, the Municipal Code states that "Building-permit Only" ADUs must comply with all of the general requirements outlined in Section 17.52.020.C.1., which pertain to size, height, and setbacks. ADUs that do not qualify for "Building-permit Only" require an "ADU Planning Permit" and are subject to all the objective standards outlined in Section 17.52.020.D. and E., which include requirements related to size, height, lot coverage, parking, architectural requirements, and landscaping. Per Section 15.52.050 (ADU exception review) of the Municipal Code, ADUs and JADUs that do not comply with every applicable standard in Section 17.52.020 may be permitted by the director of building and planning if the ADU or JADU undergoes the Town's design review process established in Municipal Code Chapter 2.12. Therefore, while new ADUs may not be subject to review by the Town's Architecture and Design Review Board, requirements and comprehensive objective design standards are included in the Town's Municipal Code to ensure the potential aesthetics impacts of new ADUs is less than significant.

Multi-Family Opportunity Sites

Nueva School Opportunity Site

The Nueva School Opportunity Site, as described under Impact AES-2, would be developed according to the Nueva Private School's 1996 Master Plan. The 1996 Master Plan for the housing site includes a proposed ten-foot-high sound wall and new trees between the proposed housing and Skyline Boulevard, which would effectively screen the new housing from view from Skyline Boulevard and I-280. Further, the Nueva Private School site and surrounding parcels are already developed with buildings, including school buildings on site and residential buildings in the vicinity, and the addition of six new, screened multi-family residential units would not present a significant visual contrast to the existing environment. Further, while the Town does not currently have established multi-family building design standards, the Town's current Zoning Ordinance allows for the development of the proposed multi-family housing at the Nueva

School, and the new building(s) would be subject to existing applicable zoning regulations, including the Town's design review process. Therefore, development of the Nueva School Opportunity Site is anticipated to result in less-than-significant visual impacts.

Burlingame Country Club Opportunity Site

The Burlingame Country Club Opportunity Site, if developed, would construct up to five multi-family housing units for use and occupancy by Club employees. The Burlingame Country Club is a private recreational facility that is developed with a golf course, club house, and accessory structures. The addition of a small number of multi-family housing units at this site would not constitute a significant change in the existing visual character of the site as the site is already developed with structures and is located in an area surrounded by residential development. Further, while the Town does not currently have established multi-family building design standards, the Town's current Zoning Ordinance allows for the development of the proposed multi-family housing at the Burlingame Country Club, and the new building(s) would be subject to existing applicable zoning regulations, including the Town's design review process. Therefore, development of the Burlingame Country Club Opportunity Site is anticipated to result in less-than-significant visual impacts.

Town Hall Complex Opportunity Site

The Town Hall Complex Opportunity Site is currently developed with several freestanding buildings housing Town offices and the Hillsborough Police Department (HPD), a small parklet, Centennial Park, several parking lots, a Town-owned right of way (Walnut Avenue) encumbered with underground infrastructure, and a single-family home. As such, the site is already developed with buildings and structures typical of an urban setting.

Development of the Town Hall Complex Opportunity Site would redevelop a portion of the existing site with a total of 16 multi-family housing units. While the addition of multi-family housing on-site would serve as a change in the visual character of the existing site, new multi-family buildings would not likely represent a substantial change in the visual quality of the site and its surroundings as multifamily housing buildings are typical of developed, urban settings adjacent to the El Camino Real transportation corridor. Further, development of the Town Hall Complex Opportunity Site would be subject to the Town's architectural review requirements. As such, development of the Town Hall Complex Opportunity Site would result in less-than-significant visual impacts.

Tobin Clark Opportunity Site

While the General Plan does not provide a description of scenic vistas or scenic resources in the Town, the Town contains hillsides and ridgelines that create visually appealing landscapes. The Hillsborough hills, which are located throughout the central and western portions of the Town, could therefore be considered a scenic resource. The Hillsborough hills are visible from other parts of the Town, although views from parts of the Town with flatter topography may be partially obstructed by intervening buildings and structures. As discussed previously, alteration of currently vacant hillside land may change the visual character of the Town's hillside and ridgeline scenic resources.

The Tobin Clark Opportunity Site is constrained by steep slopes, ephemeral streams, and sensitive vegetation types. The vacant site upon which the Tobin Clark housing, if approved,

would be developed is along a ridgeline of a hillside that extends downward from the College of San Mateo's northernmost parking lot. Views of this undeveloped hillside and ridgeline are readily available from numerous downslope public viewpoints in the vicinity. Due to topography and the layout of the adjacent College of San Mateo campus on which the buildings are "pushed back" from the ridgeline, views of the San Mateo College buildings and structures are either minimally visible (when viewed from public viewpoints from the east of the site, such as Tobin Clark Drive) or not at all visible (when viewed from public viewpoints to the north and west of College of San Mateo) from the surrounding downslope neighborhoods that are provided views of the Tobin Clark site. As such, the new buildings that would be constructed on the Tobin Clark Opportunity Site would not readily blend in with any immediately adjacent existing buildings. Additionally, development of the Tobin Clark site would remove vegetation for building construction that currently provides scenic value and that may have contributed to the screening of the new buildings.

The conceptual plan for the Tobin Clark Opportunity Site proposes the construction of the multi-family buildings just below the ridgeline of the San Mateo College campus adjacent to an existing parking lot. The conceptual plan proposes this building layout due to the development constraints presented by the site's steep slopes, presence of sensitive biological resources, and the necessity to provide site ingress and egress through connection of the proposed internal access road with Athletic Loop Road and the College of San Mateo parking lot. Without proper screening, the proposed buildings that would be constructed just below the ridgeline would be readily visible from surrounding public viewpoints to the north and west as a result of this proposed site design. Glare that may be created by the reflection of sunlight off the windows of the new multi-family residential buildings would be readily visible from surrounding public viewpoints, though intervening vegetation lining or surrounding public roads and other public viewpoints may reduce the effect of new glare to some extent. Dependent upon the height of the proposed buildings, the new multi-family residential buildings may stand out even more along the ridgeline.

As described above, the Town's existing design review process does not contain standards for multi-family residential buildings and the Town's Residential Design Guidelines do not provide guidance for the design of multi-family residential buildings. To reduce the potentially significant visual impacts of development of the Tobin Clark Opportunity Site, design standards and guidance for multi-family residential dwellings relating to building height, massing, materials, colors, screening, including landscaping, lighting, windows, including glare reduction, are needed.

Pertaining to the Tobin Clark site in particular, design standards for building massing, building color, screening, lighting, and glare reduction for windows would be most effective in reducing potential visual impacts. Suitable design standards would ensure the adequate screening of new buildings from surrounding public viewpoints as much as possible with vegetation that would create a visually appealing landscape and, where the new buildings cannot be fully screened from view, create well-designed buildings that blend in as much as possible with the surrounding hillside and minimize any potential window glare and escape of light to the night sky.

The Town is currently planning to develop Objective Design Standards for multi-family residential housing, though it is currently unknown when the new Objective Design Standards would be adopted. Mitigation Measure AES-1 below is required to ensure the new Objective

Design Standards and amended Residential Design Guidelines contain design standards that would reduce or minimize the potential visual impacts of the Tobin Clark development. Design criteria and guidance contained within the new Objective Design Standards and amended Residential Design Guidelines would also help reduce potentially significant visual impacts associated with other future multi-family residential development within the Planning Area.

Impact AES-1: Development of the Tobin Clark Housing Opportunity Site could result in potentially significant visual impacts due to the construction of new multi-family residential buildings along a prominent, currently vacant ridgeline that provides scenic value.

Mitigation Measure AES-1: Develop Objective Design Standards. Prior to the issuance of building permit(s) for the Tobin Clark Opportunity Site, the Town shall:

- Develop Objective Design Standards for multi-family residential buildings consistent with State law and amend the Zoning Ordinance and Planning Department application submittal checklist to require information and materials that accurately and sufficiently demonstrate a project's compliance with architectural façade and site and building design policies contained within the new Objective Design Standards.
- Amend the Town's Residential Design Guidelines to be consistent with the multi-family residential Objective Design Standards.
- Amend the Zoning Ordinance to include Objective Design Standards and transitional design standards for multi-family residential buildings adjacent to single-family homes, as appropriate. Standards may include height limitations, increased setbacks, landscaping requirements and density limitations.
- Ensure that new development sensitively transitions to the character of adjacent structures and the immediate neighborhood.
- Ensure residential structures are designed to be compatible with existing structures in the vicinity, minimize obstructing views from adjacent structures or views of community importance, and be consistent with the community design principles.
- Include within the new Objective Design Standards architectural façade and site and building design requirements related to building massing strategies, downward facing and fully shielded lighting, window glass types to reduce sun glare off windows and interior lighting escaping the building at night, screening of garbage areas and roof-top utility systems, and landscaping and revegetation planning for adequate screening.

Although the multi-family housing Objective Design Standards required under Mitigation Measure AES-1 above would likely be adopted by the time a development application is submitted for the Tobin Clark site, it cannot be guaranteed that the Objective Design Standards would minimize the effects of development of the Tobin Clark site on the visual character or quality of the area sufficiently to reduce potential effects to less than significant. Therefore, the aesthetics impact of the potential development of the Tobin Clark site, even with Mitigation Measure AES-1, would be ***significant and unavoidable***.

Summary

Conformance with the existing Hillsborough General Plan policies and actions relating to aesthetics and the protection of visual quality and the Town's design review process would ensure new residential development that may be facilitated by implementation of the Project, except the development of the Tobin Clark site, would not adversely affect existing visual quality

and scenic resources within the Planning Area. As discussed above, Mitigation Measure AES-1 would require the Town to develop new multi-family housing Objective Design Standards that would reduce the potential visual impacts of development of the Tobin Clark site. However, it cannot be determined to what extent the required Objective Design Standards would reduce the potential visual impacts of development of the Tobin Clark site because the Objective Design Standards have not yet been developed, and it is not guaranteed that the Objective Design Standards would be adopted prior to the submission of a development application for the Tobin Clark site. Therefore, this impact would be ***significant and unavoidable***.

Construction Impacts

Impacts to the visual character and quality of a residential development site could occur during construction activities. Typical construction activities would include site preparation and materials stockpiling, tree and vegetation removal, grading, installation of public and private utilities, building construction, application of architectural coatings, paving of surface parking areas, installation of landscaping, and roadway improvements. Construction equipment including, but not limited to, backhoes, excavators, graders, rubber-tired dozers, crushing machines for concrete and asphalt, and hauling trucks and materials may be present at construction sites during construction activities.

During future construction activities, residential development sites within the Planning Area, which is primarily urban in nature, would undergo temporary transformations in visual character. For example, at the onset of site redevelopment, structures and asphalt parking lots would be demolished and sites would be graded. During future construction, vacant graded sites could represent a temporary negative visual effect to adjacent property owners and passers-by, as could the constructed building foundations and framing elements of buildings. Project sites would transition over time from active construction zones to completed development. General Plan Policy LU-2.4, which requires construction projects to be completed in a timely manner and minimize visual impacts related to on-site location of sanitary facilities, construction materials, and recycling materials, would reduce the significance of any potential visual impacts associated with construction of the residential development that may be facilitated by the Project.

Due to required conformance with General Plan Policy LU-2.4, the visual changes anticipated during construction of future projects within the Planning Area would not substantially degrade the visual character a project site and its surroundings. Therefore, construction impacts on visual character within the Planning Area would be ***less than significant***.

Zoning Ordinance Amendments

The project includes the rezoning of certain areas to allow for fulfilment of the Town's RHNA by increasing the density in certain zoning designations. The potential Zoning Ordinance amendments are anticipated to include single-family residential, multi-family residential, and mixed-use land use categories, which would provide for development of multi-family housing and denser single-family housing on lots that are currently zoned for less dense residential development or zoned for non-residential development.

The Zoning Ordinance revisions would revise and rename the Town's existing Residential District to Traditional Residential (RD-1) and create two new Zoning Districts, Mixed Residential

(RD-2) and Governmental and Residential Mixed Use (RD-3). The new residential zoning district designations would increase the maximum allowed densities in these districts. RD-1 District revisions include decreasing the minimum required lot size, decreasing the lot width minimum, increasing maximum building and impervious surface coverage, lowering the minimum dwelling unit size, and more. The RD-2 District and RD-3 District would similarly prescribe development standards that allow for denser residential development. Future development projects resulting from the Project would comply with the General Plan policies listed under the Land Use Element discussion above. Required conformance with the existing General Plan policies relating to preserving visual character and scenic quality in the Town would ensure that new development projects respect the scale and character of adjacent residential uses to promote neighborhood compatibility.

In addition to density increases, the Town proposes to revise development standards for residential and mixed-use residential zoning districts such as setbacks, FAR, parking, landscaping, private open space, and other development-related requirements to reflect recent changes in State law and to better reflect current development practices and the new density changes. The General Plan Land Use Element (including the Land Use Map) would be updated to ensure consistency between the General Plan and Zoning Ordinance as required by State law. The Town would also ensure consistency between the General Plan and Zoning Ordinance revisions in terms of policies and regulations to protect scenic quality. The impacts from proposed Zoning Ordinance amendments would therefore be ***less than significant***.

Impact AES-4 – Project Light and Glare Effects. *[Threshold of Significance (d)]*

The Project would result in the intensification of residential densities on properties throughout the Planning Area and, specifically, on properties that are proposed for redevelopment for multi-family housing or that are currently vacant and would be developed with either single-family or multi-family residential development. As a result, the Project could potentially increase the amount of light and glare at these sites and in the surrounding areas.

Existing lighting within the Planning Area is typical for urbanized areas during nighttime hours and includes streetlights, traffic signals (along Alameda de las Pulgas, El Camino Real), sports field lighting, school campus lighting, landscaping lighting, security lighting around homes, and automobile headlights.

General Plan Policy LU-1.4 would ensure that “lighting on private and public property is designed to avoid illuminating adjacent properties and public rights-of-way and does not contribute to an overall increase in the ambient lighting level of the community.” Conformance with this General Plan policy would reduce potential impacts of new lighting associated with residential development that may be facilitated by implementation of the Project.

Additionally, Town’s Residential Design Guidelines currently contain guidelines for lighting on private property. These guidelines state that exterior lighting should not be directed toward the street, the sky or neighboring parcels, and exterior lighting should be designed to subtly highlight key features of the landscape design, such as walkways or paths, and augment architectural features of the residence.

New uses and development may result in an increase in the number of lighting sources currently within the Planning Area; however, given the Planning Area is already heavily

developed, such increases are expected to be minimal in nature relative to the existing ambient lighting in the Planning Area. Potentially significant lighting and glare impacts, if any, would be reduced in severity through conformance with General Plan Policy LU-1.4, the Town's design review process, and future CEQA review of potential new development or redevelopment. As such, future development allowed under the proposed Focused GPU would be designed in such a manner that it would not negatively impact surrounding properties or negatively affect the night sky, and this impact would be ***less than significant***.

4.1.5 References

California Department of Transportation (Caltrans). 2023. California State Scenic Highway Map. Accessed August 20, 2023 at https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa.

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4.2 Air Quality

This EIR chapter provides information on the environmental and regulatory air quality setting of the planning area and evaluates the potential amount of emissions of regulated air pollutants that could be generated by construction and operation of projects pursuant to the Focused GPU. The methodologies and assumptions used in the preparation of this section follow the CEQA Guidelines developed by the Bay Area Air Quality Management District (BAAQMD). Information on existing air quality conditions, federal, and State ambient air quality standards, and pollutants of concern was obtained from the U.S. Environmental Protection Agency (U.S. EPA), California Air Resources Board (CARB), and BAAQMD. This EIR air quality analysis has been closely coordinated with the energy and greenhouse gas analyses contained in Chapters 4.5 and 4.7 of this EIR.

4.2.1 Environmental Setting

Air quality is a function of pollutant emissions and topographic and meteorological influences. The physical features and atmospheric conditions of a landscape interact to affect the movement and dispersion of pollutants and determine its air quality.

San Francisco Bay Area Air Basin

The U.S. EPA and CARB are the federal and State agencies charged with maintaining air quality in the nation and California, respectively. The U.S. EPA delegates much of its authority over air quality to CARB which has geographically divided the State into 15 air basins for the purposes of managing air quality on a regional basis. An air basin is a CARB-designated management unit with similar meteorological and geographic conditions.

The Town of Hillsborough is located in the San Francisco Bay Area Air Basin (SFBAAB), which includes all or parts of the nine counties that surround the San Francisco Bay, including Contra Costa, Alameda, Santa Clara, San Mateo, San Francisco, Marin, the southeastern portion of Sonoma, Napa, and the southwestern portion of Solano (CARB 2012). The SFBAAB encompasses 101 cities across almost 7,000 square miles, containing more than 7 million people (BAAQMD 2022). The SFBAAB is currently designated as a nonattainment area for a number of different types of air pollutants (including ozone precursors and various forms of particulate matter) under State and federal ambient air quality standards.

Air quality in the SFBAAB is managed by the BAAQMD. Pursuant to the California Clean Air Act, the BAAQMD is responsible for bringing air quality within the SFBAAB into conformity with federal and State air quality standards by reducing existing emission levels and ensuring that future emission levels meet applicable air quality standards. The BAAQMD works with federal, State, and local agencies to reduce pollutant emissions through adoption and implementation of rules and regulations.

SFBAAB Climate and Meteorology

The climate of the Bay Area region is classified as Mediterranean (CEC 2018). The climate is dominated by the Pacific high-pressure system that results in generally mild, dry summers and mild, wet winters. In addition to the SFBAAB's topography and geographic location, El Niño and La Niña patterns in the central Pacific Ocean can also have large effects on weather and rainfall received in the SFBAAB between November and March. Local weather conditions within the

SFBAAB are also dependent on local topography and proximity to the Pacific Ocean. Hillsborough is characterized by densely vegetated, undulating hillsides with intermittently spaced single-family residences. Marine air from the Pacific Ocean flows eastward across the Town, making its way through the hills and into the Burlingame/San Mateo area and the rest of the Bay Area. During the winter, the coastal range to the west blocks Hillsborough from substantial rainfall, and during the summer the range blocks it from a majority of the coastal fog. Daytime high temperatures range from the high-50s during the winter to the low-70s during summer. Winter lows generally do not reach below the low-40s, and during the summer are typically around 50 degrees.

Regulated Air Pollutants

The U.S. EPA has established National Ambient Air Quality Standards (NAAQS) for six common air pollutants: ozone (O_3), particulate matter (PM), which consists of "inhalable coarse" PM (particles with an aerodynamic diameter between 2.5 and 10 microns in diameter, or PM_{10}) and "fine" PM (particles with an aerodynamic diameter smaller than 2.5 microns, or $PM_{2.5}$) carbon monoxide (CO), nitrogen dioxide (NO_2) sulfur dioxide (SO_2), and lead. The U.S. EPA refers to these six common pollutants as "criteria" pollutants because the agency regulates the pollutants on the basis of human health and/or environmentally-based criteria and because they are known to cause adverse human health effects and/or adverse effects on the environment.

CARB has also established California Ambient Air Quality Standards (CAAQS) for the six criteria air pollutants regulated by the federal Clean Air Act (the CAAQS are more stringent than the NAAQS), plus the following additional air pollutants due to their known adverse effects on human health or the environment: hydrogen sulfide (H_2S), sulfates (SO_X), vinyl chloride, and visibility reducing particles.

A description of the air pollutants associated with the proposed Project and its vicinity is provided below. Air pollutants not commonly associated with the existing or proposed sources in the Planning Area such as hydrogen sulfide and visibility reducing particles, are not described below.

- **Ground-level Ozone (O_3)**, or smog, is not emitted directly into the atmosphere, but is created from chemical reactions between oxides of nitrogen (NO_X) and volatile organic compounds (VOCs), also called reactive organic gases (ROG), in the presence of sunlight (U.S. EPA 2022a). Typically, ozone formation occurs most frequently on hot sunny days in urban areas with NO_X and ROG pollution. Ozone can irritate the nose, throat, and air pathways, and can cause or aggravate shortness of breath, coughing, asthma attacks, and lung diseases such as emphysema and bronchitis.
    - **ROG** is a term defined by CARB as any compound of carbon, excluding carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate, and includes several low-reactive organic compounds which have been exempted by the U.S. EPA (CARB 2004).
    - **VOC** is a term defined by the U.S. EPA as any compound of carbon, excluding carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate, which participates in atmospheric photochemical reactions. The term exempts organic compounds of carbon which have been determined to have negligible photochemical reactivity such as methane, ethane, and methylene chloride (CARB 2004).

- **Particulate Matter (PM)**, also known as particle pollution, is a mixture of extremely small solid and liquid particles made up of a variety of components such as organic chemicals, metals, and soil and dust particles (U.S. EPA 2022b).
  - **PM_{10}**, also known as inhalable coarse, respirable, or suspended PM, consists of particles less than or equal to 10 micrometers in diameter (approximately 1/7th the thickness of a human hair). These particles can be inhaled deep into the lungs and possibly enter the blood stream, causing health effects that include, but are not limited to, increased respiratory symptoms (e.g., irritation, coughing), decreased lung capacity, aggravated asthma, irregular heartbeats, heart attacks, and premature death in people with heart or lung disease (U.S. EPA 2022b).
  - **$PM_{2.5}$**, also known as fine PM, consists of particles less than or equal to 2.5 micrometers in diameter (approximately 1/30th the thickness of a human hair). These particles pose an increased risk because they can penetrate the deepest parts of the lung, leading to and exacerbating heart and lung health effects (U.S. EPA 2022b).
- **Carbon Monoxide (CO)** is an odorless, colorless gas that is formed by the incomplete combustion of fuels. Motor vehicles are the single largest source of carbon monoxide in the Bay Area Basin. At high concentrations, CO reduces the oxygen-carrying capacity of the blood and can aggravate cardiovascular disease and cause headaches, dizziness, unconsciousness, and even death (U.S. EPA 2022c).
- **Nitrogen Dioxide (NO_2)** is a by-product of combustion. NO_2 is not directly emitted but is formed through a reaction between nitric oxide (NO) and atmospheric oxygen. NO and NO_2 are collectively referred to as NOX and are major contributors to ozone formation. NO_2 also contributes to the formation of particulate matter. NO_2 can cause breathing difficulties at high concentrations (U.S. EPA 2022d).
- **Sulfur Dioxide (SO_2)** is one of a group of highly reactive gases known as SOX. Fossil fuel combustion in power plants and industrial facilities are the largest emitters of SO_2. Short-term effects of SO_2 exposure can include adverse respiratory effects such as asthma symptoms. SO_2 and other SOX can react to form PM (U.S. EPA 2022e).
- **Sulfates (SO_4^{2-})** are the fully oxidized ionic form of sulfur. SO_4^{2-} are primarily produced from fuel combustion. Sulfur compounds in the fuel are oxidized to SO2 during the combustion process and subsequently converted to sulfate compounds in the atmosphere. Sulfate exposure can increase risks of respiratory disease (CARB 2022).
- **Lead** is a metal found naturally in the environment as well as in manufactured products. Mobile sources used to be the main contributor to ambient lead concentrations in the air. In the early 1970s, the U.S. EPA established national regulations to gradually reduce the lead content in gasoline, and in 1996, lead was banned from gasoline. As a result of these efforts, emissions of lead from the transportation sector and levels of lead in the air decreased dramatically. Lead can adversely affect multiple organ systems of the body and people of every age group. Lead poisoning in young children can cause brain damage, behavioral problems, and liver or kidney damage. Lead poisoning to adults can cause reproductive problems, muscle and joint pain, nerve disorders and kidney disease (CARB 2016a).

Common criteria air pollutants, such as ozone precursors, SO_2, and PM, are emitted by a large number of sources and have effects on a regional basis (i.e., throughout the SFBAAB). Other pollutants, such as hazardous air pollutants (HAPs; described in more detail below under “Toxic Air Contaminants”), toxic air contaminants (TACs; described in more detail below), and fugitive

dust, are generally not as prevalent and/or emitted by fewer and more specific sources. As such, these pollutants have much greater effects on local air quality conditions and local receptors.

Ambient Air Quality Standards and Attainment Status

In general, the NAAQS and CAAQS define "clean" air, and are established at levels designed to protect the health of the most sensitive groups in our communities by defining the maximum amount of a pollutant (averaged over a specified period of time) that can be present in outdoor air without any harmful effects on people or the environment. Air pollutant levels are typically described in terms of concentration, which refers to the amount of pollutant material per volumetric unit of air. Concentrations are typically measured in parts per million (ppm) or micrograms per cubic meter ($\mu g/m^3$).

The U.S. EPA, CARB, and regional air agencies such as BAAQMD, measure and monitor pollutants in the ambient air and compare pollutant levels against NAAQS and CAAQS. Based on these comparisons, regions are classified into one of the following categories:

- **Attainment.** A region is "in attainment" if monitoring shows ambient concentrations of a specific pollutant to be less than or equal to NAAQS or CAAQS. In addition, an area that has been re-designated from nonattainment to attainment is classified as a "maintenance area" for 10 years to ensure that the air quality improvements are sustained.
- **Nonattainment.** If the NAAQS or CAAQS are exceeded for a pollutant, the region is designated as nonattainment for that pollutant. Some NAAQS and CAAQS require the standard to be exceeded multiple times for a region to be classified as nonattainment. Federal and state laws require nonattainment areas to develop strategies, plans, and control measures to reduce pollutant concentrations to levels that meet, or attain, standards.
- **Unclassified.** An area is unclassified if the ambient air monitoring data are incomplete and do not support a designation of attainment or nonattainment.

The significance of a pollutant concentration is determined by comparing the concentration to an appropriate ambient air quality standard. The standards represent the allowable pollutant concentrations designed to ensure that the public health and welfare are protected, while including a reasonable margin of safety to protect the more sensitive individuals in the population. Table 4.2-1 shows the state and federal standards for criteria pollutants and provides a summary of the attainment status for the SFBAAB.

Table 4.2-1: Ambient Air Quality Standards

Pollutant	Averaging Time(A)	California Standards(B)	Attainment Status(C)	National Standards(B)	Attainment Status
Ozone	1-Hour	180 µg/m3	N	--	--
	8-Hour	137 µg/m3	N	137 µg/m3	N
PM10	24-Hour	50 µg/m3	N	150 µg/m3	U

Table 4.2-1: Ambient Air Quality Standards

Pollutant	Averaging Time(A)	California Standards(B)	Attainment Status(C)	National Standards(B)	Attainment Status
	Annual Average	20 µg/m3	N	--	--
PM2.5	24-Hour	--	--	35 µg/m3	N(D)
	Annual Average	12 µg/m3	N	12 µg/m3	A
Carbon Monoxide	1-Hour	23,000 µg/m3	A	40,000 µg/m3	A
	8-Hour	10,000 µg/m3	A	10,000 µg/m3	A
Nitrogen Dioxide	1-Hour	339 µg/m3	A	188 µg/m3	U
	Annual Average	57 µg/m3	--	100 µg/m3	A
Sulfur Dioxide	1-Hour	655 µg/m3	A	196 µg/m3	U
	24-Hour	105 µg/m3	A	--	--
Lead	3-Months Rolling	--	--	0.15 µg/m3	A
Sulfates	24-Hour	25 µg/m3	A	--	--
H2S	1-Hour	42 µg/m3	U	--	--
Vinyl Chloride	24-Hour	26 µg/m3	--	--	--

Source: BAAQMD 2023a, U.S. EPA 2023 modified by MIG.

This table does not list CAAQS for lead and visibility reducing particles. California standards for ozone, carbon monoxide, sulfur dioxide (1 and 24-hour), nitrogen dioxide, suspended PM10 and PM2.5 are values that are not to be exceeded. The standards for sulfates, hydrogen sulfide, and vinyl chloride are not to be equaled or exceeded.

Standards shown are the primary NAAQS designed to protect public health. All standards shown in terms of micrograms per cubic meter (µg/m3) for comparison purposes.

A= Attainment, N= Nonattainment, U=Unclassifiable.

On January 2013, the U.S. EPA issued a final rule to determine the Bay Area attains the 24-hour PM2.5 national standard. This EPA rule suspends key State Implementation Plan (SIP) requirements as long as monitoring data continue to show that the Bay Area attains the standard. Despite this EPA action, the Bay Area will continue to be designated as “non-attainment” for the national 24-hour PM2.5 standard until such time as the Air District submits a “redesignation request” and a “maintenance plan” to EPA, and EPA approves the proposed redesignation.

Toxic Air Contaminants

In addition to criteria air pollutants, the U.S. EPA and CARB have classified certain pollutants as HAPs and TACs, respectively. The U.S. EPA has identified 188 HAPs, including substances such as benzene and formaldehyde. CARB also considers particulate emissions from diesel-fueled engines and other substances to be TACs. Since CARB’s list of TACs references and includes U.S. EPA’s list of HAPs, this EIR uses the term “TAC” when referring to HAPs and

TACs. TACs can cause severe health effects at very low concentrations (non-cancer effects), and many are suspected or confirmed carcinogens (i.e., can cause cancer) (U.S. EPA 2020). People exposed to TACs at sufficient concentrations and durations may have an increased chance of getting cancer or experiencing other serious health effects such as (but not limited to) reduced immune system, as well as neurological, reproductive (e.g., reduced fertility), developmental, respiratory, and/or other health problems (CARB 2020). A description of the TACs associated with the proposed Project and its vicinity is provided below:

- Diesel Particulate Matter (DPM). Diesel engines emit both gaseous and solid material; the solid material is known as DPM. Almost all DPM is less than 1 µm in diameter, and thus is a subset of $PM_{2.5}$. DPM is typically composed of carbon particles and numerous organic compounds. Diesel exhaust also contains gaseous pollutants including VOCs and NO_X. The primary sources of diesel emissions are ships, trains, trucks, rail yards and heavily traveled roadways. These sources are often located near highly populated areas, resulting in greater DPM related health consequences in urban areas. The majority of DPM is small enough to be inhaled into the lungs and what particles are not exhaled can be deposited on the lung surfaces and in the deepest regions of the lungs where they are most susceptible to injury. In 1998, CARB identified DPM as a toxic air contaminant based on evidence of a relationship between diesel exhaust exposure and lung cancer and other adverse health effects. DPM also contributes to the same non-cancer health effects as $PM_{2.5}$ exposure (CARB 2016b).

Local Air Quality Conditions

The BAAQMD maintains a comprehensive air quality monitoring network consisting of over 30 stations distributed among the nine Bay Area counties in its jurisdiction. **Table 4.2-2:** shows the three most recent years' worth of data (i.e., 2017 to 2019) from the monitoring station located closest to the Town of Hillsborough. The station is located at 897 Barron Avenue in Redwood City, approximately eight miles southeast of Hillsborough. The Redwood City station monitors O_3, NO_2, CO, and $PM_{2.5}$. As shown in Table 4.2-2, air quality conditions have generally improved or remained about the same over the 2017 to 2019 time period:

- O_3 concentrations generally decreased from 2017 to 2019. O_3 exceedances for the state and federal 8-hour standards decreased from two in 2017 to none in 2018 then increased to two in 2019. There were no exceedances of the 1-hour standard in 2018 or 2019, but there were two exceedances in 2017.
- $PM_{2.5}$ concentrations increased from 2017 to 2018 and decreased in 2019 to levels below both 2017 and 2018 concentrations. NAAQS exceedances increased from 2017 to 2018, but there were no exceedances in 2019.
- CO, NO_2, and SO_2 had no NAAQs or CAAQS exceedances from 2017-2019.

Sensitive Receptors

Some people are more affected by air pollution than others. The BAAQMD defines sensitive receptors as "facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly and people with illnesses." (BAAQMD 2023) In general, children, senior citizens, and individuals with pre-existing health issues, such as asthmatics, are considered sensitive receptors. Both CARB and the BAAQMD

consider schools, schoolyards, parks and playgrounds, daycare facilities, nursing homes, hospitals, and residential areas as sensitive air quality land uses and receptors (CARB 2005). In general, sensitive air quality receptors in proximity of the Town include:

- Existing low-density residential receptors within the Town;
- Existing schools and education or institutional facilities including Hoover Elementary School, North Elementary School, South Elementary School, West Hillsborough Elementary and Preschool, Crocker Middle School, Nueva School, Crystal Springs Uplands School; and
- Existing parks and recreational facilities, such as Centennial Park, Crossroads Park, Vista Park, and Hillsborough Recreation Center.

Existing Air Pollution-Related Health Risks

Common sources of TAC emissions in the SFBAAB include gasoline stations, dry cleaners, diesel-fueled generators and pumps, other stationary sources (e.g., refineries), and mobile sources such as cars and trucks travelling on roads and freeways, and construction equipment, ships, and trains. CARB data collected pursuant to the AB 2588 Air Toxics “Hot Spots” Program indicates there were 10 facilities (including gas stations and generators) in the Planning Area subject to the requirements of AB 2588. A private residence on Forest View Avenue was the largest source of TAC emissions for which AB 2588 information was available at the time this EIR was prepared (CARB 2021). As noted, mobile sources such as cars, trucks, and trains can also emit TACs. There are no freeways within the Town limits, but Interstate 280 (I-280) is located to the west of the Town, State Route 92 is located to the south, and US 101 is located to the east (Town of Hillsborough, 2005). There are no local roadways within the Town with average daily traffic (ADT) volumes above 50,000 total daily vehicles.

Although the Town contains existing sources of TAC emissions, the BAAQMD has not identified the Town as an impacted community under its Community Air Risk Evaluation (CARE) program. According to CalEnviroScreen 4.0, the Town (census tracts 6081605600 and 6081605700), is in the 1st to 15th percentile based on the CalEnviroScreen indicators (e.g., exposure, environmental effects, population characteristics, socioeconomic factors), does not experience a high pollution burden, and is not considered a disadvantaged community pursuant to Senate Bill 535, which allocates funding from the state’s Cap and Trade Program to disadvantaged communities (OEHHA 2023).

Table 4.2-2: Local Air Quality Conditions 2017-2019

Pollutant	Ambient Air Standard	Year		
		2017	2018	2019
Ozone (O3)				
Maximum 1-hr Concentration (ppm)		0.115	0.067	0.083
Maximum 8-hr Concentration (ppm)		0.086	0.049	0.077
Number of Days Exceeding State 1-hr Standard	>180 µg/m3	2	0	0
Number of Days Exceeding State 8-hr Standard	>137 µg/m3	2	0	2
Days Exceeding Federal 1-hr Standard	>0.124 ppm	2	0	0

Table 4.2-2: Local Air Quality Conditions 2017-2019				
Pollutant	Ambient Air Standard	Year		
		2017	2018	2019
Days Exceeding Federal 8-hr Standard	>0.070 ppm	2	0	2
Carbon Monoxide (CO)				
Maximum 1-hr Concentration (ppm)		2.8	2.5	2.0
Maximum 8-hr Concentration (ppm)		1.4	1.7	1.1
Days Exceeding State 1-hr Standard	>23,000 µg/m3	0	0	0
Days Exceeding Federal/State 8-hr Standard	>10,000 µg/m3	0	0	0
Days Exceeding Federal 1-hr Standard	>40,000 µg/m3	0	0	0
Nitrogen Dioxide (NO2)				
Maximum 1-hr Concentration (ppb)		67	77	55
Annual Arithmetic Mean Concentration (ppb)		11	11	9
Days Exceeding State 1-hr Standard	>180 µg/m3	0	0	0
Fine Particulate Matter (PM2.5)				
Maximum 24-hr Concentration (µg/m3)		60.8	120.9	29.5
Annual Arithmetic Mean (µg/m3)		9.1	10.3	7.0
Samples Exceeding Federal 24-hr Standard	>35 µg/m3	6	13	0
Source: BAAQMD 2023c				

4.2.2 Regulatory Framework

Federal

Federal Clean Air Act

The Federal Clean Air Act, as amended, provides the overarching basis for both federal and State air pollution prevention, control, and regulation. The Act establishes the U.S. EPA's responsibilities for protecting and improving the nation's air quality. The U.S. EPA oversees federal programs for setting air quality standards and designating attainment status, permitting new and modified stationary sources of pollutants, controlling emissions of hazardous air pollutants, and reducing emissions from motor vehicles and other mobile sources. In 1971, to achieve the purposes of Section 109 of the CAA, the EPA developed primary and secondary NAAQS. Primary standards are designed to protect human health with an adequate margin of safety. Secondary standards are designed to protect property and public welfare from air pollutants in the atmosphere.

The U.S. EPA requires each state prepare and submit a State Implementation Plan (SIP) that consists of background information, rules, technical documentation, and agreements that an individual state will use to attain compliance with the NAAQS within federally-imposed deadlines. State and local agencies implement the plans and rules associated with the SIP, but the rules are also federally enforceable.

State

California Clean Air Act

In addition to being subject to federal requirements, air quality in the state is also governed by more stringent regulations under the California Clean Air Act, which was enacted in 1988 to develop plans and strategies for attaining the CAAQS. As discussed above, in California, both the Federal and State Clean Air acts are administered by CARB. CARB oversees the functions of local air pollution control districts and air quality management districts, which in turn administer air quality activities at the regional level.

In-Use Off-Road Diesel Equipment Program

CARB's In-Use Off-Road Diesel Equipment regulation is intended to reduce emissions of NO_X and PM from off-road diesel vehicles, including construction equipment, operating within California. The regulation imposes limits on idling; requires reporting equipment and engine information and labeling all vehicles reported; restricts adding older vehicles to fleets; and requires fleets to reduce their emissions by retiring, replacing, or repowering older engines or installing exhaust retrofits for PM. The requirements and compliance dates of the off-road regulation vary by fleet size, and large fleets (fleets with more than 5,000 horsepower) must meet average targets or comply with Best Available Control Technology requirements beginning in 2014. CARB has off-road anti-idling regulations affecting self-propelled diesel-fueled vehicles 25 horsepower and up. The off-road anti-idling regulations limit idling on applicable equipment to no more than five minutes, unless exempted due to safety, operation, or maintenance requirements.

On-Road Heavy-Duty Diesel Vehicles (In-Use) Regulation

CARB's On-Road Heavy-Duty Diesel Vehicles (In-Use) regulation (also known as the Truck and Bus Regulation) is intended to reduce emission of NO_X, PM, and other criteria pollutants generated from existing on-road diesel vehicles operating in California. The regulation applies to nearly all diesel-fueled trucks and buses with a gross vehicle weight rating (GVWR) greater than 14,000 pounds that are privately or federally owned, and for privately and publicly owned school buses. Heavier trucks and buses with a GVWR greater than 26,000 pounds must comply with a schedule by engine model year or owners can report to show compliance with more flexible options. Fleets complying with the heavier trucks and buses schedule must install the best available PM filter on 1996 model year and newer engines and replace the vehicle 8 years later. Trucks with 1995 model year and older engines had to be replaced starting in 2015. Replacements with a 2010 model year or newer engine meet the final requirements, but owners can also replace the equipment with used trucks that have a future compliance date (as specified in regulation). By 2023, all trucks and buses must have at least 2010 model year engines with few exceptions.

CARB Stationary Diesel Engines – Emission Regulations

In 1998, CARB identified DPM as a TAC. To reduce public exposure to DPM, in 2000, the Board approved the Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles (Risk Reduction Plan). Integral to this plan is the implementation of control measures to reduce DPM such as the control measures for stationary diesel-fueled

engines. As such, diesel generators must comply with regulations under CARB's amendments to Airborne Toxic Control Measure for Stationary Compression Ignition Engines and be permitted by the BAAQMD.

CARB Air Quality and Land Use Handbook

In 1998, CARB identified particulate matter from diesel-fueled engines as a TAC. CARB's Air Quality and Land Use Handbook is intended to serve as a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process (CARB 2005). The CARB Handbook recommends that planning agencies consider proximity to air pollution sources when considering new locations for "sensitive" land uses, such as residences, medical facilities, daycare centers, schools, and playgrounds. Air pollution sources of concern include freeways, rail yards, ports, refineries, distribution centers, chrome plating facilities, dry cleaners, and large gasoline service stations. Key recommendations in the Handbook relative to the Planning Area include taking steps to consider or avoid siting new, sensitive land uses:

- Within 500 feet of a freeway, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day;
- Within 300 feet of gasoline fueling stations; or
- Within 300 feet of dry-cleaning operations (dry cleaning with TACs is being phased out and will be prohibited in 2023).

CARB prepared a technical supplement to the Handbook, a Technical Advisory on Strategies to Reduce Air Pollution Exposure Near High Volume Roadways, that provides recommendations for strategies to minimize exposure of the public to air pollutants due to proximity to high volume roadways (CARB 2017).

Air Toxics "Hot Spots" Program

State requirements specifically address emissions of air toxics through Assembly Bill (AB) 1807 (known as the Tanner Bill) that established the State Air Toxics "Hot Spots" Program and the Air Toxics Hot Spots Information and Assessment Act of 1987 (AB 2588) (California Health and Safety Code Section 44300 et seq.). Under the Hot Spots Program, CARB must collect data on toxic emissions from stationary sources (facilities) throughout the State and ascertain potential cancer and non-cancer health risks that these emissions pose to members of the community. California's Children's Environmental Health Protection Act of 1999 (California Health and Safety Code Section 39606) also requires explicit consideration of infants and children in assessing risks from air toxics. Substances regulated under California's Air Toxics Hot Spots Program are defined in statute and include a list of substances developed by the following sources:

- International Agency for Research on Cancer (IARC);
- U.S. EPA
- U.S. National Toxicology Program (NTP);
- CARB Toxic Air Contaminant Identification Program List;
- Hazard Evaluation System and Information Service (HESIS) (State of California);

- Proposition 65 (Safe Drinking Water and Toxic Enforcement Act of 1986) list of carcinogens and reproductive toxicants (State of California); and
- Any additional substance recognized by the State Board as presenting a chronic or acute threat to public health when present in the ambient air.

Asbestos Airborne Toxic Control Measure

The Asbestos Airborne Toxic Control Measure for Construction, Grading, Quarrying, and Surface Mining Operations (17 CCR §93105) is a CARB regulation that applies to any road construction and maintenance, or construction and grading operations on any property that is located in a geographic ultramafic rock unit or has naturally occurring asbestos, serpentine rock, or ultramafic rock.

Sierra Club v. County of Fresno

The California Supreme Court's 2018 decision in Sierra Club v. County of Fresno (6 Cal. 5th 502), hereafter referred to as the Friant Ranch Decision, reviewed the long-term regional air quality analysis contained in the environmental impact report (EIR) for the proposed Community Plan Update and Friant Ranch Specific Plan (Friant Ranch Project). The Friant Ranch Project proposed a 942-acre master-plan development in unincorporated Fresno County, within the San Joaquin Valley Air Basin, which was at the time the EIR was prepared (and current still is) designated as a nonattainment area with respect to the NAAQS and CAAQS for O_3 and $PM_{2.5}$. 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." The court's decision notes that environmental documents must attempt to connect a project's air quality impacts to specific health effects or explain why it is not technically feasible to perform such an analysis.

Regional

CARB divides the state into 15 air basins based on geographic and meteorological features. One or more local air districts administer air quality management within each basin. These air districts develop local air quality/pollutant regulations and prepare air quality plans that set goals and measures for achieving attainment with ambient air quality standards. The districts also develop emission inventories, collect air monitoring data, and perform dispersion modeling simulations to establish strategies to reduce emissions and improve air quality. Local air regulations and air quality plans include measures to reduce air pollutant emissions from industrial facilities, commercial processes, motor vehicles, and other sources.

Bay Area Air Quality Management District

The BAAQMD is the agency primarily responsible for maintaining air quality and regulating emissions of criteria and toxic air pollutants within the SFBAAB. The BAAQMD carries out this responsibility by preparing, adopting, and implementing plans, regulations, and rules that are designed to achieve attainment of state and national air quality standards. The BAAQMD currently has 14 regulations containing more than 100 rules that control and limit emissions from

sources of pollutants (BAAQMD 2023b). Table 4.2-3 below presents the major BAAQMD rules and regulation that may apply to future development projects in the Town.

On April 29, 2017, the BAAQMD adopted its Spare the Air-Cool the Climate 2017 Clean Air Plan (Clean Air Plan). The 2017 Clean Air Plan updates the most recent Bay Area ozone plan, the 2010 Clean Air Plan, in fulfillment of state ozone planning requirements. Over the next 35 years, the Plan will focus on the three following goals:

- Attain all state and national quality standards;
- Eliminate disparities among Bay Area communities in cancer health risk from toxic air contaminants; and
- Reduce Bay Area GHG Emissions to 40 percent below 1990 levels by 2030, and 80 percent below 1990 levels by 2050.

The 2017 Plan includes 85 distinct control measures to help the region reduce air pollutants and has a long-term strategic vision which forecasts what a clean air Bay Area will look like in the year 2050. The control measures aggressively target the largest source of GHG, ozone pollutants, and particulate matter emissions – transportation. The 2017 Plan includes more incentives for electric vehicle infrastructure, off-road electrification projects such as Caltrain and shore power at ports, and reducing emissions from trucks, school buses, marine vessels, locomotives and off-road equipment.

Table 4.2-3: Potentially Applicable BAAQMD Rules and Regulations

Regulation	Rule	Description
1- General Provisions and Definitions	1- General Provisions and Definitions	301 – Public Nuisance: Establishes that no person shall discharge quantities of air contaminants or other materials which cause injury, detriment, nuisance or annoyance to any considerable number or person or the public; or which endangers the comfort, repose, health or safety of any such person or the public.
2- Permits	2- New Source Review	Provides for the review of new and modified sources of pollutants; requires use of Best Available Control Technology and emissions offsets to achieve no net increase in nonattainment pollutants; implements Prevention of Significant Deterioration review for attainment pollutants.
2 – Permits	5 – New Source Review of Toxic Air Contaminants	Provides for the review of new and modified sources of toxic air contaminants; requires use of Best Available Control Technology for sources that have a risk above certain thresholds and limits total project risks to 10.0 in a million cancer risk, 1.0 chronic hazard index, and 1.0 acute hazard index.
6 – Particulate Matter	1 – General Requirements	Limits visible particulate matter emissions.
6 – Particulate Matter	6 – Prohibition of Trackout	Reduce emissions of particulate matter from commercial and industrial sources through control of trackout of solid materials.

Table 4.2-3: Potentially Applicable BAAQMD Rules and Regulations		
Regulation	**Rule**	**Description**
7- Odorous substances	Odorous Substances	Establishes general limitations on odorous substances and specific emission limitations on certain odorous compounds, such as ammonia.
9 – Inorganic Gaseous Pollutants	8 – NO_X and CO from Stationary Internal Combustion Engines	Limits emissions of NO_x and CO from stationary internal gas combustion engines more than 50 brake horsepower.
11 – Hazardous Pollutants	2 – Asbestos Demolition, Renovation, and Manufacturing	Controls emissions of asbestos to the atmosphere during demolition.
Source: BAAQMD 2023b		

Local

Town of Hillsborough General Plan

The following goals, policies, and actions are applicable to this EIR's air quality impacts analysis. These items are excerpted from the Circulation and Public Safety elements in the General Plan.

Goal C-6 - Promote public health and safety by working towards improved air quality.

Policy C-6.1 - Cooperate with regional agencies to promote air quality.

Goal PS-5 - Protect the community from human-caused hazards, such as criminal activity, air pollution and hazardous materials.

Policy PS-5.2 - Cooperate and participate in regional air quality management planning, programs and enforcement measures.

Action PS-5.2 - The Town will continue to support the Bay Area Air Quality Management District in monitoring air pollutants of concern on a continuous basis, as well as the implementation of the regional Clean Air Plan.

4.2.3 Thresholds of Significance

Based on the CEQA Guidelines, the Project would have a significant impact related to air quality if it will:

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. Create objectionable odors affecting a substantial number of people.

The BAAQMD's CEQA Air Quality Guidelines contains guidance on assessing and mitigating both project- and plan-level air quality impacts (BAAQMD 2023a). Page 7-1 of the BAAQMD's guidelines states:

> *"As a general principle, the guidance offered in this chapter [Chapter 7 Plan-Level Impacts] should be applied to discretionary, program-level planning activities, whereas the project-level guidance presented in Chapters 5 and 6 should be applied to individual project-specific approvals, such as a proposed land use project. Long-range plans typically contain strategies implemented over a 20-year, or longer, time horizon and include or rely upon discretionary planning activities (e.g., zoning). Local long-range plans include general plans and general plan elements, specific plans, area plans, communitywide plans, congestion management plans, and annexations of lands and service areas."*

The proposed Project is a planning-level document that does not authorize or approve any specific project and is therefore primarily analyzed using the plan-level guidance contained in Chapter 7 of the BAAQMD CEQA Air Quality Guidelines (BAAQMD 2023a). Whereas the proposed Project provides the blueprint and basis for future land use decisions within the Planning Area, individual future development projects supported by the Project could be analyzed using the project-level guidance contained in Chapters 5 and 6 of the BAAQMD CEQA Air Quality Guidelines. This project-level guidance has also informed the evaluation of air quality impacts presented below. The BAAQMD's plan-and project-level thresholds of significance are summarized in Table 4.2-4 and Table 4.2-5, respectively. The project level thresholds are provided for information purposes only.

Table 4.2-4: BAAQMD Plan-Level Thresholds of Significance

Pollutant	Threshold of Significance	
	Construction	**Operational Emissions**
Criteria Air Pollutants (Regional)	None	Project must be consistent with current air quality plan control measures, and
Local Community Risks and Hazards	None	Overlay zones around existing and planned sources of TACs (including adopted Risk Reduction Plan areas), and
Accidental release of acutely hazardous air pollutants	None	None
Odors		Identify the location, and include policies to reduce the impacts, of existing or planned sources of odors.
Source: BAAQMD 2023a		

Table 4.2-5: BAAQMD Project-Level Thresholds of Significance			
	Threshold of Significance		
	Construction Emissions	Operational Emissions	
Pollutant	Daily Emissions (pounds per day)	Daily Emissions (pounds per day)	Annual Emissions (tons per year)
ROG	54	54	10
NOX	54	54	10
Exhaust PM10	82	82	15
Exhaust PM2.5	54	54	10
Fugitive Dust PM10/PM2.5	Best Management Practices	None	
Local CO	None	9.0 ppm (8-hour average) 20.0 ppm (1-hour average)	
Risks and Hazards – New Source/Receptor (Individual)	Compliance with Qualified Community Risk Reduction Plan; or Increased cancer risk of >10.0 in a million; and Increased non-cancer risk of >1.0 Hazard Index (chronic or acute); and Ambient PM2.5 increase: >0.3µg/m3 annual average		
Risks and Hazards – New Source/Receptor (Cumulative)	Compliance with Qualified Community Risk Reduction Plan; or Increased cancer risk of >100 in a million (from all local sources); and Increased non-cancer risk of >10.0 Hazard Index (from all local sources) (chronic); and Ambient PM2.5 increase: >0.8µg/m3 annual average (from all local sources)		
Accidental Release of Acutely Hazardous Pollutants	None	Storage or use of acutely hazardous materials locating near receptors or receptors locating near stored or used acutely hazardous materials considered significant	
Odors	None	Complaint History – 5 confirmed complaints per year averaged over three years	
Source: BAAQMD 2023a			

4.2.4 Impacts and Mitigation Measures

The proposed Project consists of updates to the existing 2014 - 2022 Housing Element to reflect the 6th cycle 2023 – 2031 housing assignments. In addition, associated amendments to the Land Use Element and General Plan Land Use Map, Open Space and Conservation Element, and Public Safety Element; amendments to Title 17 (Zoning) of the Hillsborough Municipal Code, and amendments to the Hillsborough Zoning Map are proposed for consistency of all Town documents, codes, and regulations. These associated amendments are generally described in sections 3.3.9 through 3.3.12 in the Project Description and would not result in environmental impacts to air quality. Therefore, they are not discussed further in this chapter. The impact analysis focuses on the residential development that would be facilitated by the Draft 2023 – 2031 Housing Element.

Impact AIR-1 – Conflict with or obstruct implementation of the applicable air quality plan, *[Threshold of Significance (a) and (b) for operational criteria air pollutant emissions]*

Consistent with the BAAQMD's CEQA Air Quality Guidelines, the proposed Project would result in a significant impact if it would be inconsistent with the 2017 Clean Air Plan or result in a projected increase in vehicle trips or VMT that exceeds a projected population increase. As described below, the Project has the potential to be inconsistent with one of the control measures in the 2017 Clean Air Plan and therefore be inconsistent with the Clean Air Plan.

The BAAQMD's CEQA Guidelines recommend a lead agency analyze consistency with the 2017 Clean Air Plan using the following three questions:

1. Does the project support the primary goals of the Air Quality Plan?
2. Does the project include applicable control measures from the Air Quality Plan?
3. Does the project disrupt or hinder implementation of any Air Quality Plan control measures?

The BAAQMD's 2017 Clean Air Plan is a multi-pollutant plan focused on protecting public health and the climate. Specifically, the primary air quality-related goals of the 2017 Clean Air Plan (Consistency Question 1) are to:[20]

- Goal 1: Attain all state and national air quality standards; and
- Goal 2: Eliminate disparities among Bay Area communities in cancer health risk from TACs,

According to the BAAQMD CEQA Guidelines, to meet the thresholds of significance for operational-related criteria air pollutant and precursor impacts for plans (i.e., attain state and air quality standards per Consistency Question 1, Goal 1), a proposed plan must satisfy the following criteria:

- Criteria 1: Consistency with current air quality plan control measures; and
- Criteria 2: A proposed plan's projected VMT or vehicle trips increase in less than or equal to its projected population increase.

Based on the preceding discussion of the criteria needed to meet the BAAQMD thresholds of significance for plan-level documents, the following analysis is organized as such:

- Consistency with Air Quality Plan Control Measures. This section addresses:
  - Consistency Question 1 (Primary Goals of Air Quality Plan): Goal 1 - Attain Air Quality Standards, Criteria 1 (Applicable Control Measures)
  - Consistency Question 2 (Include Applicable Control Measures from Air Quality Plan)
- Disrupt or Hinder Implementation of Air Quality Plan Control Measures. This section addresses:
  - Consistency Question 3 (Disrupt or Hinder Implementation of Air Quality Plan)

[20] In addition to the two goals identified in this Chapter, the 2017 Clean Air Plan includes a third primary goal related to Bay Area greenhouse gas (GHG) emissions. For the purposes of this EIR, consistency with the 2017 Clean Air Plan's goal related to GHG emissions is considered and evaluated separately in EIR Chapter 4.7 (Greenhouse Gas Emissions).

- Increases in Vehicle Trips and Service Population. This section addresses:
  - Consistency Question 1 (Primary Goals of Air Quality Plan): Goal 1 - Attain Air Quality Standards, Criteria 2 (Vehicle Trips and Population Growth)
- Eliminate Health Risk Disparities Among Bay Area Communities. This section addresses:
  - Consistency Question 1 (Primary Goals of Air Quality Plan): Goal 2 – Eliminate Health Risk Disparities Among Bay Area Communities

Consistency with Air Quality Plan Control Measures

The 2017 Clean Air Plan contains 85 control strategies designed to reduce ozone precursors, protect public health, and serve as a regional climate protection strategy. The 85 control strategies identified in the 2017 Clean Air plan are grouped by nine economic-based sectors as shown in Table 4.2-6.

Table 4.2-6: BAAQMD 2017 Clean Air Plan Control Measure Sectors

Sector	No. of Measures	General Description of Sector Applicability
Agriculture (AG)	4	Applies to sources of air pollution from agricultural operations include on and off-road trucks and farming equipment, aircraft for crop spraying, animal waste, pesticide and fertilizer use, crop residue burning, travel on unpaved roads, and soil tillage.
Buildings (BL)	4	Applies to residential, commercial, governmental and institutional buildings, which generate emissions through energy use for heating, cooling, and operating the building, and from the materials used in building construction and maintenance
Energy (EN)	2	Applies to emissions of criteria pollutants, TACs, and GHGs from electricity generated and used within the Bay area, as well as GHG emissions from electricity generated outside the Bay area that is imported and used within the region
Natural and Working Lands (NW)	3	Applies to emissions from natural and working lands, including forests, woodlands, shrub lands, grasslands, rangelands, and wetlands.
Stationary Sources (SS)	40	Applies to stationary sources generally used in commercial and industrial facilities. Such sources are typically regulated through BAAQMD rulemaking, permitting, and enforcement programs
Super GHGs (SL)	3	Applies to emissions of methane, black carbon, and fluorinated gases
Transportation (TR)	23	Applies to on-road motor vehicles such as light-duty automobiles or heavy-duty trucks, as well as off-road vehicles, including airplanes, locomotives, ships and boats, and off-road equipment such as airport ground-support equipment, construction equipment and farm equipment.
Waste (WA)	4	Applies to emissions from landfills and composting activities.

Table 4.2-6: BAAQMD 2017 Clean Air Plan Control Measure Sectors		
Sector	**No. of Measures**	**General Description of Sector Applicability**
Water (WR)	2	Applies to direct emissions from the treatment of water and wastewater at publicly owned treatment works and indirect emissions associated with the energy used to pump, convey, recycle, and treat water and wastewater throughout the Bay.

The BAAQMD's implementation of the control strategies employs a wide range of tools and resources, and many of the control strategies are not intended or designed to be achieved by local government. Table 4.2-7 identifies the 2017 Clean Air Plan control measures that are relevant to the proposed Project and summarizes how the Project would be consistent with these measures.

Table 4.2-7: BAAQMD 2017 Clean Air Plan Control Measure Consistency	
Applicable 2017 Clean Air Plan Control Measures	**Proposed Project Consistency**
Transportation Control Measures	
TR10: Land Use Strategies	Inconsistent. The proposed Project would accommodate approximately 605 new dwelling units in the Town; however, only approximately 21 percent (127 units) would be multi-family. The remaining 79 percent (478 units) would come from accessory dwelling units (ADUs), pipeline projects, or subdivision/lot split opportunity sites. While the amount of ADUs (400 units, or 66 percent of the units proposed by the Project) would result in a densification of units in the Town, ADUs would be geographically spread out due to the existing, single-family development nature of the Town. Jurisdictions such as the Town, that are primarily developed as a single land use (i.e., single-family residential), tend to result in higher VMT compared to other jurisdictions that have higher density and mixes of land uses (e.g., residential, retail, and office space) and that are well served by non-vehicular infrastructure (e.g., bicycle and pedestrian walkways) and transit amenities. This statement is supported by the transportation modeling that was prepared for the proposed Project that shows VMT in the Town is higher than the regional average. In addition, as discussed under Impact GHG-1, the Focused GPU could impede the goals of Plan Bay Area 2050 because it would result in low-density development away from transit corridors, and result in higher per capita VMT in the Town in 2040 than without adoption of the Housing Element (see Chapter 4.14).

Table 4.2-7: BAAQMD 2017 Clean Air Plan Control Measure Consistency	
Applicable 2017 Clean Air Plan Control Measures	**Proposed Project Consistency**
Building Control Measures	
BL1: Green Buildings	Consistent. New development occurring under implementation of the proposed Project would be subject to the latest CalGreen requirements, which establish statewide standards for sustainable building practices, as well as the Town's Reach Code, which prohibits natural gas in water and space heating equipment and requires the necessary electrical infrastructure be installed to support electric ranges, ovens, and clothes dryers if natural gas is pursued at this point in time.
Waste Management Control Measures	
WA4: Recycling and Waste Reduction	Consistent. New development occurring under implementation of the proposed Project would be required to comply with Hillsborough Municipal Code Chapter 15.18.020 – Diversion Requirements, which requires applicants to divert least 65 percent of construction and demolition debris generated by the Project (or a numerical threshold established by subsequent state regulation under the CalGreen Code specified in Municipal Code Chapter 15.19 – Green Building Regulations) by using recycling, reuse, and diversion programs.
Water Control Measures	
WR2: Support Water Conservation	Consistent. New development occurring under implementation of the Project would meet CalGreen Code requirements as specified in Hillsborough Municipal Code Chapters 15.19 – Green Building Regulations and 15.29 – Water Conservation in Landscaping Requirements.

As shown in Table 4.2-7, the proposed Project would be consistent with applicable control measures contained in the 2017 Clean Air Plan, except for TR10: Land Use Strategies, because it would exceed the VMT Threshold of Significance (see Chapter 4.14 Transportation.

As shown in Table 4.2-7, the proposed Project would be consistent with applicable control measures contained in the 2017 Clean Air Plan, except for TR10: Land Use Strategies, because 1) it proposes primarily low-density residential development away from high quality transit amenities and, and 2) the Project would increase VMT when the regional strategy (Plan Bay Area 2050) calls for a 20 percent reduction in VMT by 2035.

Disrupt or Hinder Implementation of the Clean Air Plan Control Measures

As shown in Table 4.2-7, the proposed project would be consistent with applicable 2017 Clean Plan control measures, except TR10: Land Use Strategies. While the proposed project would generally not conflict with the 2017 Clean Air Plan control measures it would conflict with one strategy and, therefore, potentially hinder implementation of the 2017 Clean Air Plan.

Vehicle Trips and Population Growth

The BAAQMD CEQA Air Quality Guidelines recommend lead agencies evaluate the projected VMT or vehicle trips in relation to projected population increases when considering the adoption of a plan-level document. Specifically, that the projected VMT or vehicle trips are less than or equal to the projected population increase. Table 4.2-8 compares the potential increases in trip generation, VMT, and population under the proposed project to the trip generation, VMT and population conditions under existing 2020 conditions and under 2040 No Project conditions.

As shown in Table 4.2-8, the proposed project's projected increase in VMT would be less than the projected population increase, suggesting that vehicle trips would become more efficient under project conditions. This is true when comparing project conditions against both the existing 2020 conditions and the 2040 No Project conditions, and also comparing the project's projected increase in trip generation against increases in population.

Table 4.2-8: Project Trip Generation, VMT, and Population Increases

Year	Daily Trip Generation	Daily VMT	Population
Existing Conditions Compared to 2040 Project Conditions			
Existing 2020	42,925	320,402	11,410
2040 Project	44,597	325,166	12,802
Percent Increase	3.9%	1.5%	12.2%
2040 No Project Conditions Compared to 2040 Project Conditions			
2040 No Project	39,868	290,426	11,410
2040 Project	44,597	325,166	12,802
Percent Increase	11.9%	12.0%	12.2%
Sources: Kittleson and Associates 2023.			

Eliminate Disparities in Health Risks

As described under Section 4.2.1, the Town is located within an area shown by CalEnviroScreen to have pollution burden percentiles ranging from the 1st to 15th percentile, which indicates relatively low health risks in the Town as compared to other areas of the state. In addition, the Town is not an impacted community identified under the BAAQMD's CARE Program and is not considered a disadvantaged community pursuant to SB 535. Therefore, although the proposed project could result in potentially significant health risk increases (see Impact AIR-2), it would not do so in an area that is currently disadvantaged or disproportionately affected by adverse air quality. The potential health risks posed by implementation of the project are solely related to those posed by construction activities, which are temporary in nature. The project proposes residential land uses and would not include industrial or other land uses that have the potential to generate long-term TAC emissions from large stationary sources or industrial processes. The proposed project would not increase health risk disparities in the Bay Area.

Summary and Conclusion

The proposed project would be inconsistent with one of the control measures (TR10: Land Use Strategies) identified in the 2017 Clean Air Plan related to VMT from land use planning. Although the growth in trips and VMT attributable to the project would be less than the increase in population growth, the project could still obstruct implementation of the 2017 Clean Air Plan due to control measure inconsistency. Because of this, the project has the potential to generate a cumulatively considerable net increase in criteria air pollutant emissions for which the region is non-attainment, including ozone precursors, $PM_{2.5}$, and PM_{10}, pursuant to BAAQMD plan-level assessment criteria.

This is considered a potentially significant impact. Therefore, Mitigation Measure AIR-1 is proposed, see below. Mitigation Measure AIR-1 would help to reduce VMT generated by the additional residential units proposed by Housing Element; however, it would not be enough to reduce this impact to less than significant, as the 2017 Clean Air Plan control measure the Project is inconsistent with is directly related to land use planning. This impact would be ***significant and unavoidable*** despite the implementation of mitigation.

Mitigation Measures

Impact AIR-1: The proposed Project would be inconsistent with one of the control measures (TR10: Land Use Strategies) identified in the 2017 Clean Air Plan related to VMT from land use planning.

Mitigation Measure AIR-1: Reduce VMT. Residential development projects occurring on sites identified in Housing Element programs shall be required to achieve a VMT significance threshold of 15 percent below the countywide average residential VMT per capita. This is generally considered the maximum feasible mitigation that can be achieved in suburban contexts, according to *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity*, California Air Pollution Control Officers Association (CAPCOA), 2021 (CAPCOA report). For individual development projects that do not achieve VMT significance thresholds, applicants shall submit documentation that demonstrates how the necessary VMT reductions will be achieved. See Mitigation Measure TRANS-1.

Impact AIR-2 – Result in substantial pollutant concentrations that result in community health risks and hazards. *[Thresholds of Significance (b) for construction criteria air pollutant emissions and (c)]*

This section evaluates the potential for the proposed Project to generate substantial pollutant concentrations that could impact sensitive air quality receptors. In addition, this section presents information on the potential for existing mobile and stationary sources of emissions to impact new sensitive receptors associated with the Project.

<u>Construction-Related Pollutant Concentrations</u>

The adoption of the proposed Project would not directly result in construction of any residential development or infrastructure; however, future residential development facilitated by the Project

would result in short-term construction-emissions of criteria air pollutants and toxic air contaminants emissions that would have the potential to adversely affect air quality.

Although specific project-characteristics are not known, construction activities associated with typical residential development can include demolition, site preparation, grading, building construction, paving, and architectural coating phases. These types of construction activities could generate emissions from the following sources:

- Gasoline- and diesel-fuel combustion in on- and off-site, heavy-duty construction equipment, worker vehicle trips, vendor vehicle trips, and haul truck trips, which generate emissions of ROG, NOX, CO, exhaust PM, and other pollutants. The age, type, amount, size, and activity hours of construction equipment use, as well as the associated number of workers, vendors, and haul trucks needed to construct a project, all influence the amount of exhaust emissions produced during construction.
- On- and off-site vehicle travel on paved and unpaved roads used to access the job site generates fugitive dust and PM emissions. The silt content, moisture level, vehicle weight, and vehicle speed are factors that affect fugitive dust emissions from vehicle travel on paved and unpaved roads.
- Demolition and ground disturbance activities associated with grading, excavation, and other soil-disturbing activities also generate fugitive dust and PM emissions. Emissions that occur as a result of these activities not only occur during the active earth disturbance, but also while the materials are being deposited into haul trucks and transported to their final destinations. Similar to vehicle travel on unpaved roads, the soil moisture, wind speed, and volume of material moved affect potential fugitive dust emissions from earth moving activities.
- Surface coating and finishes (e.g., painting, waterproofing, etc.) generate ROG emissions from off-gassing/evaporation of pollutants.

The BAAQMD's CEQA Air Quality Guidelines contain construction screening criteria to provide lead agencies with a conservative indication of whether a proposed project could result in potentially significant construction-related air quality impact. Consistent with the BAAQMD's guidance, if a project meets all the construction screening criteria, then the project would result in a less than significant construction air quality impact and a detailed construction air quality assessment would not be required for the project. Table 4.2-9 compares the potential development supported by the proposed Project sites with the BAAQMD's construction screening criteria.

As described in Table 4.2-9, the number of units proposed at each of the housing opportunity sites are anticipated to be less than the construction screening size criterion developed by the BAAQMD to help lead agencies determine if a detailed construction air quality impact assessment would be required.

However, with regard to the other criteria, there are insufficient project-specific details at this point to determine if all projects would meet all BAAQMD construction screening criteria (e.g., project phasing and earth moving requirements for site preparation/grading). In addition, individual construction projects would emit DPM, a TAC. The exposure of sensitive receptors near (i.e., within 500 feet) of construction sites to DPM could have an adverse health risk impact to nearby receptors if project construction activities were of sufficient intensity and duration to

result in prolonged exposure to DPM emissions. Consistent with the BAAQMD's construction screening criteria, this condition would be most likely to occur for projects that involve the simultaneous occurrence of more than one construction activity, extensive site preparation, and/or extensive material transport.

Table 4.2-9: Project Consistency with BAAQMD Construction Screening Criteria

Criterion	Requirement	Project Consistency
Land Use Type and Size	Project is below the construction screening size for the appropriate project type:	All individual proposed project sites, including the ADUs, vacant Opportunity Sites, subdivision/lot split Opportunity Sites, and multi-family opportunity sites would be below the residential construction screening size criterion. For example, the Opportunity Site that could accommodate the greatest number of single-family homes (the 2260 Redington Road subdivision/lot split opportunity site) only proposes approximately 35 dwelling units, which is less than 15 percent of the BAAQMD's single-family residential screening threshold of 254 dwelling units. Similarly, the Opportunity Site that could accommodate the greatest number of multi-family dwelling units (the Tobin Clark multi-family Opportunity Site) only proposes approximately 100 units, which less than 25 percent of the BAAQMD's multi-family screening threshold of 416 dwelling units.
Basic Construction Measures	Project design and implementation includes all BAAQMD Basic Construction Mitigation Measures	The Town will require future development projects supported by the Project to incorporate the BAAQMD Basic Construction Mitigation Measures into the project design (see Mitigation Measure AIR-2a).
Construction and Operational Overlap	Construction-related activities would not overlap with operational activities.	There are insufficient project-specific details to determine if all individual housing projects implemented under the Focused GPU would meet this BAAQMD construction screening criterion. It is anticipated that most of the smaller housing opportunity sites would meet this criterion; however, subdivision/lot split and multi-family opportunity sites may involve phasing, where some units would become occupied while others are finished.
Demolition	The project would not include demolition.	There are insufficient project-specific details to determine if all individual housing projects implemented under the Focused GPU would meet this BAAQMD construction screening criterion; however, it is anticipated that most individual housing projects would meet this criterion, except the Town Hall site where demolition would be required.
Construction	Construction does not include	There are insufficient project-specific details

Table 4.2-9: Project Consistency with BAAQMD Construction Screening Criteria

Criterion	Requirement	Project Consistency
Phases	simultaneous occurrence of more than two construction phases (e.g., grading, paving, and building construction would occur simultaneously)	to determine if individual housing projects implemented under the Focused GPU would meet this BAAQMD construction screening criterion.
Multiple Land Uses	Construction does not include simultaneous construction of more than one land use type	The proposed Project only involves residential land uses. Therefore, it is anticipated that all individual housing projects would meet this BAAQMD construction screening criterion.
Site Preparation	Construction does not require extensive site preparation (e.g., grading, cut and fill, or earth movement)	There are insufficient project-specific details to determine if individual housing projects implemented under the Focused GPU would meet this BAAQMD construction screening criterion. Based on Hillsborough's topography, it is anticipated that some sites may require extensive earth moving operations to make the sites suitable for development.
Material Transport	Construction does not require extensive material transport and considerable haul truck activity (greater than 10,000 cubic yards).	There are insufficient project-specific details to determine if individual housing projects implemented under the Focused GPU would meet this BAAQMD construction screening criterion; however, sites that require substantial earth moving and site leveling may require extensive material transport.
Source: BAAQMD 2023a, pgs. 4-3 and 4-4		

Although unlikely, there is the potential for future residential development projects facilitated by the Project to exceed BAAQMD project-level construction thresholds of significance. This is considered a ***potentially significant impact.*** Accordingly, the Town will incorporate Mitigation Measures AIR-2a and AIR-2b into future residential development projects facilitated by the Project. Mitigation Measure AIR-2a requires future residential development projects to implement the BAAQMD's Basic Construction Measures to control fugitive dust emissions generated during construction activities.

Mitigation Measure AIR-2b requires future residential development projects facilitated by the proposed Project that cannot satisfy all BAAQMD construction screening criteria to prepare a detailed construction air quality impact assessment that identifies potential project construction emissions, compares emissions against BAAQMD project-level construction thresholds of significance and, if necessary, incorporate measures to reduce construction emission impacts to levels below the BAAQMD's construction thresholds of significance for criteria air pollutants and TACs.

<u>Carbon Monoxide Hot Spots</u>

The BAAQMD has developed a screening-level analysis to determine if projects could result in a CO hotspot (BAAQMD 2023a). Projects that are consistent with the applicable congestion management program, and that do not cause traffic volumes at affected intersections to increase to more than 44,000 vehicles per hour, do not result in a CO hotspot that could exceed State or federal air quality standards (BAAQMD 2023a). Based on the transportation analysis prepared for the Project by Kittleson and Associates, the maximum number of vehicles on any road segment in a given hour in the Planning Area under 2040 project conditions would be approximately 1,631 vehicles on Hayne Road (between Skyline Boulevard (SR 35)/Black Mountain Road and Mosely Road and 3rd Ave) during the PM peak hour (Kittleson and Associates 2023). This is substantially less than the BAAQMD's threshold of 44,000 vehicles per hour. Therefore, the proposed Project would not cause or significantly contribute to CO concentrations that exceed State or federal ambient air quality standards for CO. This impact would be ***less than significant***.

Project-Generated Criteria Air Pollutants of Human Health Concern

All criteria pollutants that could be generated by the proposed Project would be 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. O_3 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 Proposed Project would be O_3 precursors (ROG and NO_X), PM_{10}, and $PM_{2.5}$, for which the SFBAAB is designated non-attainment.

Adverse health effects from regional criteria pollutant emissions, such as O_3 precursors, PM_{10}, and $PM_{2.5}$, that could be generated by the proposed Project 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]). Therefore, O_3 precursors contribute to the formation of ground-level O_3 on a regional scale, and emissions of ROG and NO_X generated in an defined area may not correlate to a specific O_3 concentration in that same area. Similarly, some types of PM_{10} and $PM_{2.5}$ may be transported over long distances or formed through atmospheric reactions. As such, the magnitude and locations of specific health effects from exposure to increased O_3 or regional PM_{10} and $PM_{2.5}$ 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 since there are wide 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. Although models are capable of quantifying O_3 and any secondary particulate matter 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. Therefore, translating project-generated criteria pollutants to the locations where specific health effects could occur or the resultant number of additional days of nonattainment is not possible with any degree of

accuracy. The technical limitations of existing models (e.g., for correlating project-level regional emissions to specific health consequences) are recognized by air quality management districts throughout the state, including the San Joaquin Valley Unified Air Pollution Control District (SJVAPCD) and South Coast Air Quality Management District (SCAQMD), which provided amici curiae briefs for the Friant Ranch Project's legal proceedings. In its brief, the SJVAPCD acknowledged that while health risk assessments for localized air toxics, such as DPM, are common, "it is not feasible to conduct a similar analysis for criteria air pollutants because currently available computer modeling tools are not equipped for this task (SJVAPCD, 2015, p. 2)." Similarly, in its brief, the SCAQMD presented similar information, stating that, "[it] takes a large amount of additional precursor emissions [e.g., NO_X] to cause a modeled increase in ambient ozone levels… a project emitting only 10 tons per year of NOx or [ROG] is small enough that its regional impact on ambient ozone levels may not be detected in the regional air quality models used to determine ozone levels…" (SCAQMD 2015). Although this information was submitted by the SCAQMD, it would generally apply to the SFBAAB as well since both the South Coast Air Basin and the SFBAAB are designated as nonattainment areas for state and national O_3 standards (the South Coast Air Basin is designated as extreme non-attainment, while the SFBAAB is designated as marginal non-attainment) (U.S. EPA 2023). In its brief, the SCAQMD also stated (SCAQMD 2015, pgs. 10-11):

> *"For the so-called criteria pollutants, such as ozone, it may be more difficult to quantify health impacts . . . It takes time and the influence of meteorological conditions for these reactions to occur, so ozone may be formed at a distance downwind from the sources . . . Scientifically, health effects from ozone are correlated with increases in the ambient level of ozone in the air a person breathes . . . However, it takes a large amount of additional precursor emissions to cause a modeled increase in ambient ozone levels over an entire region. For example, the SCAQMD's 2012 AQMP* [Air Quality Management Plan] *showed that reducing NOx by 432 tons per day (157,680 tons/year) and reducing VOC by 187 tons per day (68,255 tons/year) would reduce ozone levels at the SCAQMD's monitor site with the highest levels by only 9 parts per billion. SCAQMD staff does not currently know of a way to accurately quantify ozone-related health impacts caused by NO_X or VOC emissions from relatively small projects."*

Emissions generated by the proposed Project could increase photochemical reactions and the formation of tropospheric O_3 and secondary PM_{10} and $PM_{2.5}$, which, at certain concentrations, could lead to increased incidences of specific health consequences. Although these health effects are associated with O_3, PM_{10}, and $PM_{2.5}$, the effects are a result of cumulative and regional emissions. Therefore, the proposed Project's incremental contribution cannot be traced to specific health outcomes on a regional scale, and a quantitative correlation of project-generated regional criteria pollutant emissions to specific human health impacts is not included in this analysis. As discussed above, 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 emissions on the scale of these CEQA thresholds to be minor in nature. Such projects would not adversely affect air quality or exceed the NAAQS or CAAQS. Therefore, implementation of the proposed Project

would not exacerbate or contribute to significant health risks at or in proximity of the Project, nor would it increase the number of state or national ambient air quality standard exceedances. This impact would be ***less than significant***.

Other Disclosures – Exposure of New Receptors to Air Quality Risks and Hazards

Per the ruling by the California Supreme Court in California Building Industry Association v. Bay Area Air Quality Management District, 62 Cal.4th 369 (2015), projects are not required to analyze how existing conditions might impact a project's future users or residents; however, the BAAQMD CEQA Guidelines recommend identifying special overlay zones around existing and proposed land uses and sources of TACs. Therefore, the following is not an impact discussion under CEQA, but rather an analysis of consistency with BAAQMD recommended practices.

Within the SFBAAB, localized risks are primarily associated with exposure to TACs and $PM_{2.5}$ emissions. As discussed in Section 4.2.1, TACs are a defined set of airborne pollutants that may pose a present or potential hazard to human health, and $PM_{2.5}$ is a type of particle pollution that poses an increased risk because $PM_{2.5}$ can penetrate the deepest parts of the lung, leading to and exacerbating heart and lung health effects. Common sources of TACs and $PM_{2.5}$ emissions are stationary sources (e.g., diesel backup generators, gasoline stations, and dry cleaners), which are subject to BAAQMD permit requirements.

Another common and often more significant source type is on-road motor vehicles on high-volume roads and off-road sources such as construction equipment. Although the proposed Project does not include plans for any new, large stationary sources of emissions, it could result in new sensitive residential receptors near existing sources of emissions.

Consistent with the BAAQMD's CEQA Air Quality Guidelines, the proposed Project would not expose sensitive residential receptors to substantial community risks or hazards if it identifies special overlay zones around existing and planned sources of TACs and $PM_{2.5}$, including special overlay zones of at least 500 feet on each side of all freeways and high-volume roadways, and the plan identifies goals, policies, and objectives to minimize potentially adverse impacts. For example, the CARB *Air Quality and Land Use Handbook* recommends avoiding the siting of new sensitive land uses (e.g., residences, schools, etc.) within:

- Within 300 feet of large gasoline fueling stations (with a throughput of more than 3.6 million gallons of gasoline per year);
- Within 300 feet of dry cleaning operations;
- Within 500 feet of freeways, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day; and
- Within 1,000 feet of a major rail service or maintenance yard.

A review for gas stations and dry cleaning facilities within the Planning Area indicates there may be approximately five gas stations and zero dry cleaning facilities in or within approximately 1,000 feet of the Town's boundary. The gas station facilities are generally spread throughout the Planning Area, such as at the Burlingame Country Club, Crystal Spring Golf Course, the Town of Hillsborough Police Department, a vehicle service yard for the Town of Hillsborough, and an ARCO station located in the City of San Mateo. The closest potential housing site to these sources is the Burlingame Country Club Opportunity Site, which is on the same grounds as one

of the fueling stations. Given the large geographic expanse covered by the Country Club, it is unlikely that the dwelling units would be proposed within 300 feet of the fuel station.

In addition, the Town does not contain any freeways or urban roadways that carry more than 100,000 vehicles/day, rural roads that carry more than 50,000 vehicles/day, or major rail service or maintenance yards, except for I-280 (see Table 4.11-4). Only the Nueva School multi-family site and a pipeline project off of Churchill Drive would be within 1,000 feet of I-280.

Finally, a review of BAAQMD screening data identified 15 permitted stationary source facilities in or within 1,000 feet of the Town's boundary, including the gas station facilities identified above. Table 4.2-10 summarizes these permitted stationary sources and their corresponding cancer risk, non-carcinogenic hazard, and $PM_{2.5}$ concentrations resulting from these sources.

Table 4.2-10: Summary of BAAQMD Stationary Source Screening Data

Facility (ID)	Permit Address	Source Type	Cancer Risk	Chronic Hazard Index	$PM_{2.5}$ (µg/m3)
Pacific Bell (13454)	1480 Burlingame Ave	Generator	16.3	0.03	0.02
Town of Hillsborough (15164)	1100 Hayne Rd	Generator	1.1	<0.01	<0.01
Town of Hillsborough (15167)	1115 Tournament Dr	Generator	0.7	0.00	<0.01
San Mateo Public Library (17308)	55 W 3rd Ave	Generator	0.7	<0.01	<0.01
Versailles (18493)	10 Crystal Springs Rd	Generator	0.8	0.00	<0.01
Town of Hillsborough (18852)	2740 Skyfarm Dr	Generator	0.6	0.00	<0.01
Residence (23861)	1952 Forest View Ave	No Data	0.0	0.00	2.04
Town of Hillsborough (100645)	1320 La Honda Rd	Gas Dispensing Facility	0.3	<0.01	0.00
ARCO Facility #00725 (103221)	402 N El Camino Real	Gas Dispensing Facility	9.7	0.04	0.00
Burlingame Country Club (111223)	80 New Place Rd	Gas Dispensing Facility	0.1	0.00	0.00
Town of Hillsborough Police (111963)	1600 Floribunda Ave	Gas Dispensing Facility	0.4	<0.01	0.00

Table 4.2-10: Summary of BAAQMD Stationary Source Screening Data					
Facility (ID)	**Permit Address**	**Source Type**	**Cancer Risk**	**Chronic Hazard Index**	**$PM_{2.5}$ (µg/m3)**
Crystal Springs Golf Course (200056)	6650 Golf Course Dr	Gas Dispensing Facility	0.1	0.00	0.00
123 New Place (201712)	123 New Place Rd	Generator	5.7	<0.01	0.01
Town of Hillsborough (201792)	50 Brooke Ct	Generator	0.8	0.00	<0.01
Cherry Creek Pump Station (201830)	Entrance Between 375	Generator	1.2	0.00	<0.01
BAAQMD Individual Project Risk and Hazard Thresholds			10	1	0.3
BAAQMD Cumulative Risk and Hazard Thresholds			100	10	0.8
Source: BAAQMD 2023d					

As shown in Table 4.2-10, BAAQMD screening data indicates that the existing Pacific Bell facility may generate carcinogenic risk that could exceed BAAQMD individual project thresholds of 10 excess cancer risks per million population. The individual chronic risks and $PM_{2.5}$ concentrations from all stationary sources would be below the BAAQMD individual project thresholds of 1.0 and 0.3 µg/m3, respectively. It is noted that the BAAQMD's screening data predict pollutant concentrations and associated health risks at the facility boundary. The Pacific Bell facility is located outside of the Town, in Burlingame, and is more than 1,000 feet from the closest potential project site (the Town Hall Opportunity Site). Neither the Pacific Bell facility nor any other stationary source within, or in proximity of, the Planning Area would result in risks that would exceed BAAQMD thresholds. The proposed Project, therefore, would not expose new receptors to substantial pollutant concentrations or adverse health risks.

Conclusion and Summary

As described above, each individual housing opportunity site is anticipated to be well below the construction screening size criterion determined by the BAAQMD to require a detailed construction air quality impact assessment; however, there are insufficient project-specific details at this point to determine if all projects would meet all BAAQMD construction screening criteria. In addition, individual construction projects would emit DPM, a TAC. The exposure of sensitive receptors near construction sites to DPM could have an adverse health risk impact if project construction activities were of sufficient intensity and duration to result in prolonged exposure to DPM emissions. Although unlikely, the potential for future residential development projects facilitated by the proposed Project to exceed BAAQMD project-level construction thresholds of significance is considered a ***potentially significant impact***.

Mitigation Measure AIR-2a requires future development projects that may be facilitated by the Project to implement the BAAQMD's Basic Construction Measures to control fugitive dust emissions generated during construction activities. Mitigation Measure AIR-2b requires projects implemented under the Focused GPU that cannot meet construction screening criteria to prepare a detailed construction air quality impact assessment to: 1) estimate potential project construction emissions; 2) compare potential project construction emissions against BAAQMD project-level construction thresholds of significance; and 3) incorporate measures to reduce construction emission impacts to levels below the BAAQMD's construction thresholds of significance for criteria air pollutants and TACs. Therefore, this impact would be ***less than significant with mitigation incorporated***.

Mitigation Measures

Impact AIR-2: Future residential development facilitated by the proposed Project may expose sensitive receptors near construction sites to Diesel Particulate Matter that could have an adverse health risk impact if project construction activities were of sufficient intensity and duration to result in prolonged exposure to DPM emissions. Additionally, residential development projects facilitated by the proposed Project may exceed BAAQMD project-level construction thresholds of significance.

Mitigation Measure AIR-2a: Implement BAAQMD Basic Construction Mitigation Measures. The Town shall require new residential development facilitated by the proposed Project to implement the BAAQMD's Basic Best Management Practices for construction-related fugitive dust emissions. These practices include:

1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.

2. All haul trucks transporting soil, sand, or other loose material off-site shall be covered.

3. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.

4. All vehicle speeds on unpaved roads shall be limited to 15 mph.

5. 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.

6. All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 miles per hour.

7. All trucks and equipment, including their tires, shall be washed off prior to leaving the site.

8. Unpaved roads providing access to sites located 100 feet or further from a paved road shall be treated with a 6- to 12-inch compacted layer of wood chips, mulch, or gravel.

9. Publicly visible signs shall be posted with the telephone number and name of the person to contact at the Town 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.

Mitigation Measure AIR-2b: Prepare Project-level Construction Emissions Assessment. The Town shall require new residential development projects facilitated by the Housing Element Update to submit a project-level construction criteria air pollutant and toxic air contaminant emissions analysis as part of the project's application materials. The project-level construction emissions analysis shall be submitted and approved by the Town prior to the start of construction activities, demonstrating that project construction activities would not exceed BAAQMD project-level thresholds of significance. The Town shall require the project-level construction emissions analysis for both ministerial and discretionary projects.

The project-level construction criteria air pollutant and toxic air contaminant emissions analysis may rely on BAAQMD construction screening criteria to demonstrate that a detailed assessment of criteria air pollutant and toxic air contaminant construction emissions is not required for the project. If the project does not satisfy all BAAQMD construction screening criteria, the analysis shall estimate and compare construction criteria air pollutant and toxic air contaminant emissions against the project-level thresholds of significance maintained by the Bay Area Air Quality Management District (BAAQMD) and, if emissions are shown to be above BAAQMD thresholds, implement measures to reduce emissions below BAAQMD thresholds. Mitigation measures to reduce emissions could include, but are not limited to:

- Limiting the simultaneous occurrence of excavation, grading, and ground-disturbing construction activities;
- Installing wind breaks (e.g., trees, fences) on the windward side(s) of actively disturbed areas of construction. Wind breaks should have at maximum 50 percent air porosity;
- Planting vegetative ground cover (e.g., fast-germinating native grass seed) in disturbed areas as soon as possible and watered appropriately until vegetation is established;
- Installing sandbags or other erosion control measures to prevent silt runoff to public roadways from sites with a slope greater than one percent;
- Minimizing the amount of excavated material or waste materials stored at the site;
- Hydroseeding or applying non-toxic soil stabilizers to construction areas, including previously graded areas, that are inactive for at least 10 calendar days;
- Use of late engine model years, such as equipment meeting U.S. EPA / CARB certified Tier IV emission standards; and/or
- Other on- or off-site construction emission control measures deemed necessary to reduce construction emissions to levels below the BAAQMD's latest recommended CEQA thresholds.

Impact AIR-3 – Result in other emissions such as those leading to odors adversely affecting a substantial number of people. *[Threshold of Significance (d)]*

According to the BAAQMD's CEQA Air Quality Guidelines, land uses associated with odor complaints include agricultural operations, wastewater treatment plants, landfills, and certain industrial operations (such as manufacturing uses that produce chemicals, paper, etc.). Construction occurring within the Town could produce odors from fuel combustion and/or the

use of solvents and paints. These odors would be temporary, quickly disperse, and would not affect a substantial number of people. The Project does not directly authorize any new, major land uses identified in the BAAQMD's CEQA Air Quality Guidelines as a source of potential odors (e.g., wastewater treatment plant). This impact would be ***less than significant***.

Cumulative Impact Analysis

As described in Section 4.2.1, the SFBAAB is designated nonattainment for national and State O_3 standards, national and State $PM_{2.5}$ standards, and national PM_{10} standards. The analysis of potential air quality impacts described above indicates the Project would conflict with the 2017 Clean Air Plan and result in a significant and unavoidable impact to regional air quality (from O_3 precursor emissions, $PM_{2.5}$, and PM_{10}). Impact AIR-1's analysis is cumulative in nature. Therefore, this impact would also be significant and unavoidable. The Project would implement Mitigation Measure AIR-1 to reduce VMT; however, the nexus of the impact is related to land use density and location. This impact would remain ***significant and unavoidable*** despite the implementation of Mitigation Measure AIR-1.

Regarding construction emissions, most of the Housing Opportunity Sites would meet the BAAQMD construction screening criteria. There is, however, uncertainty regarding whether all of the Housing Opportunity Sites would be able to meet the other construction screening criteria, such as the quantity of earthwork that would be required to prepare the sites for development. Accordingly, the Town would implement Mitigation Measure AIR-2a to reduce fugitive dust and Mitigation Measure AIR-2b to ensure that all future projects facilitated under implementation of the Focused GPU would analyze their potential emissions against applicable BAAQMD thresholds of significance.

Mitigation Measures

See Mitigation Measure AIR-1, Mitigation Measure AIR-2a, and Mitigation Measure AIR-2b.

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4.3 Biological Resources

4.3.1 Methodology

This section addresses impacts to biological resources associated with the implementation of the Focused GPU (the Project). Biological resources include:

- sensitive natural communities,
- special-status species,
- regulated waterways and wetlands,
- habitats identified by the state as sensitive habitat,
- trees protected by local ordinance, and
- wildlife movement corridors and nursery sites.

The potential impacts on biological resources were assessed at a program level by reviewing existing reports and conducting site visits to update information regarding sensitive biological resources in the 2005 Town of Hillsborough General Plan (e.g., species listing status). The following primary sources were reviewed:

- California Department of Fish and Wildlife California Natural Diversity Database (CNDDB) record search of the San Mateo, San Francisco South, Hunters Point, San Leandro, Redwood Point, Palo Alto, Montara Mountain, Woodside, and Half Moon Bay U.S. Geological Survey (USGS) 7.5-minute quadrangles for special-status species and sensitive natural communities (CNDDB 2023),
- California Native Plant Society (CNPS) Rare Plant Program Inventory of Rare and Endangered Plants of California record search (CNPS 2023),
- U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) tool (USFWS 2023),
- National Marine Fisheries Service (NOAA Fisheries) Essential Fish Habitat Mapper was reviewed to determine the locations of designated, mapped Essential Fish Habitat and Habitat Areas of Particular Concern (NOAA Fisheries 2023a) (https://www.habitat.noaa.gov/apps/efhmapper/efhreport/index.html),
- NOAA Fisheries ESA Critical Habitat Mapper was reviewed to determine the locations of designated critical habitat for federally threatened and endangered species under the jurisdiction of the NOAA Fisheries (NOAA Fisheries 2023b)
- USFWS Critical Habitat Mapper was reviewed to determine the locations of designated critical habitat for federally threatened and endangered species under the jurisdiction of the USFWS in the Planning Area (USFWS 2023)
- United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) Web Soil Survey (NRCS 2023)
- ebird (Cornell Lab of Ornithology 2023)
- iNaturalist (2023)
- USFWS National Wetland Inventory (NWI 2023)
- Google Earth and Geohub Map Data
- Town of Hillsborough General Plan (GP) (Design, Community & Environment 2005)
- Town of Hillsborough 2014 Housing Element (Baird & Driskell 2014)
- Town of Hillsborough Draft 2023 Housing Element (Houseal Lavigne 2023)

- San Mateo Fine Scale Vegetation Mapping Database (Golden Gate Parks Conservancy 2022)
- Town of Hillsborough Tobin Clark Property Biological Review (WRA 2023)
- Meadowood Estates Subdivision Project Final EIR (Town of Hillsborough 2019)
- Other relevant scientific literature, technical databases, resource agency reports, and Federal Register notices and other information published by USFWS and NOAA Fisheries to assess the current distribution of special-status plants and animals in the project vicinity.

4.3.2 Environmental Setting

According to the United States Census Bureau, the town has a total area of 6.2 square miles (16 km2) (USCB 2023). It is known for wooded hills and steep slopes, particularly the western side of the town, with the landscape generally flattening to the east as it descends from Highway I-280 to El Camino Real. Hillsborough is bordered by Burlingame to the north, San Mateo to the east, unincorporated San Mateo County to the south, and Interstate 280 and unincorporated San Mateo County to the west. Hillsborough has preserved almost 250 acres of open space, located in the Skyfarm Subdivision area in the northwest, near Southdown Court, Crystal Springs Road, and in the Tobin Clark area. The watershed of Crystal Springs and San Andreas reservoirs is a large area of open space adjacent to the Town, on the western side of I-280, that adds continuum to the low-density character of the community.

Biological resources in Hillsborough are summarized in the sections below. The following information is from the Hillsborough General Plan, updated with a 2023 search of the CNDDB, and a fine scale vegetation map of San Mateo County from the Golden Gate National Parks Conservancy and other public and private partners (GGNPC 2022).

Land Cover and Vegetation Types in Hillsborough

The primary land cover type in Hillsborough is forest and woodland, closely followed by developed or landscaped areas (Table 4.3-1 and Figure 4.3-1). Figure 4.3-1 shows the land cover and vegetation types as well as the location of all the housing opportunity sites. Vegetation types also include shrubland and grassland, and there are creeks and ponds in the Town. The predominant vegetation types are described below. The vegetation map is based on data from the fine scale vegetation map of San Mateo County prepared by the Golden Gate National Parks Conservancy and other public and private partners (GGNPC 2022), and was not fully ground-truthed, since confirmation of vegetation types would be done when specific housing proposals are brought forth.

Table 4.3-1: Land Cover and Vegetation Types in Hillsborough

Land Cover/ Vegetation Type	Acres
Developed/Landscaped	**1866**
Developed/Landscaped	1,850.2
Major Road	15.79
Forest and Woodland	**1971.3**

Table 4.3-1: Land Cover and Vegetation Types in Hillsborough	
Land Cover/ Vegetation Type	**Acres**
Developed/Landscaped	**1866**
Arroyo willow thickets	4.14
Coast live oak woodland and forest	966.4
Mixed oak forest and woodland	5.58
California bay forest and woodland	105.4
Bigleaf maple – red alder forest and woodland	5.9
Forest fragment	13.87
Eucalyptus – tree of heaven – black locust groves	107.6
Monterey cypress woodland stands	36.23
Monterey pine Woodland stands	105.5
Valley oak woodland and forest	3.22
Redwood forest and woodland	36
Non-native Forest	581.5
Shrubland	**84.55**
Chamise chaparral	17.48
California sagebrush scrub	22.11
Coyote brush scrub	40.44
Non-native shrub	1.06
Shrub fragment	3.46
Grassland & Herbs	**38.68**
Californian annual & perennial grassland	38.68
Wetlands and Waterbodies	**1.71**
Water – streams, lake/pond	1.71
Total Area	**3962.2**

Source: GGNPC 2022

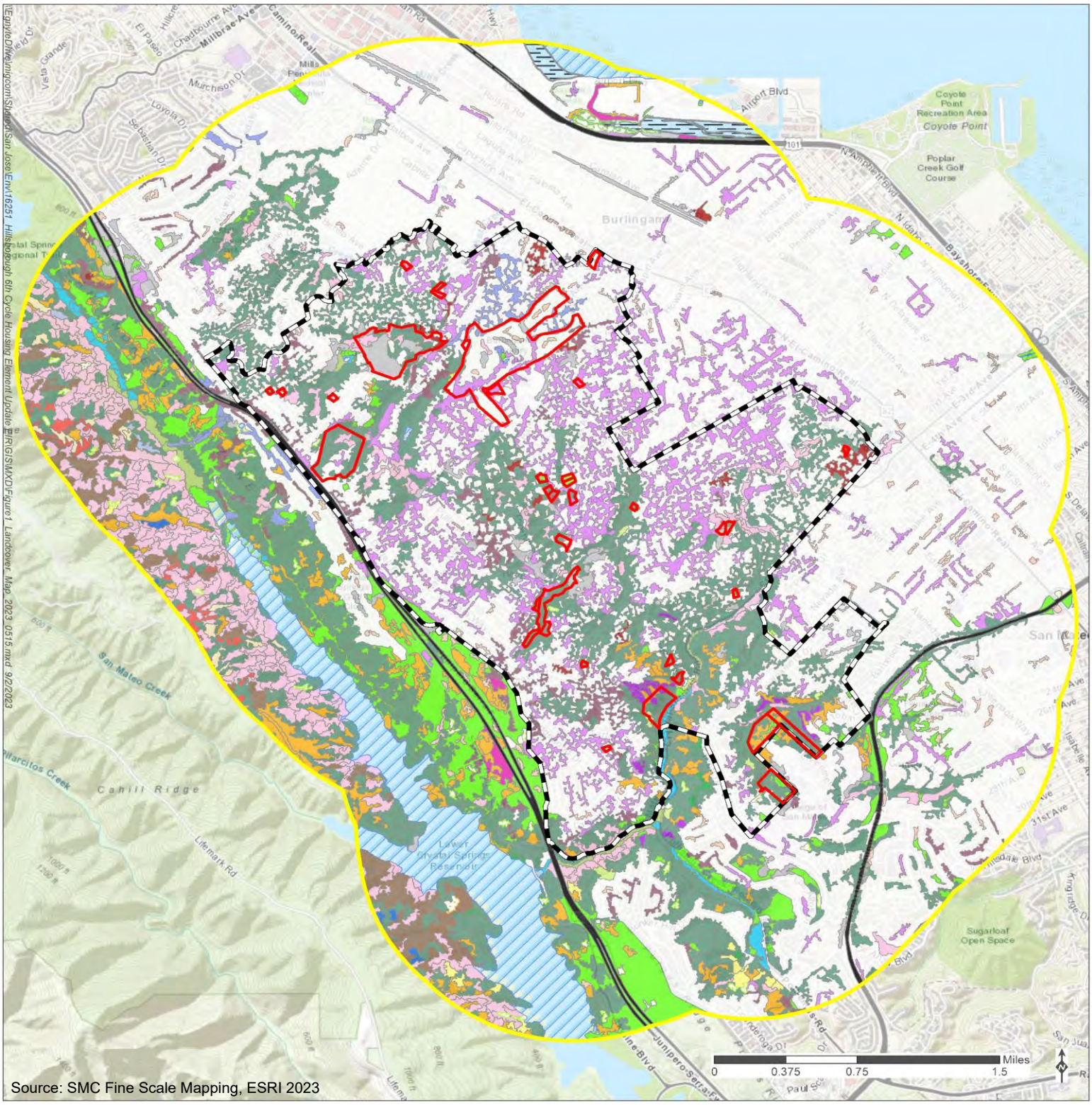


Figure 4.3-1 Land Cover and Vegetation in the Hillsborough BSA

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Developed/Landscaped (1,866 acres). Approximately 47 percent of the land in Hillsborough is developed and/or landscaped. Developed areas include buildings, roads, parking lots, sports fields, and landscaped areas. Landscape vegetation consists of street trees, lawns, commercial and public landscaping such as ornamental trees and shrubs, and residential garden plants. Plant species are mostly non-native and are chosen for beauty, edibility, and/or ease of maintenance and drought tolerance. Urban landscape plants and sometimes buildings do provide habitat for some wildlife such as birds and small mammals commonly found in urban areas.

Forest and Woodland (1,971.3 acres). Approximately 50 percent of the land within Hillsborough has forest or woodland vegetation. Forest and woodland vegetation mapped in Hillsborough is predominantly oak woodland dominated by coast live oak (*Quercus agrifolia*), valley oak (*Quercus lobata*), or blue oak (*Quercus lobata*). Approximately 975.2 acres of oak woodland and forest was mapped and of that only 3.22 acres was mapped valley oak woodland. Other forest and woodland vegetation types include California bay (*Umbellularia californica*) forest and woodland, bigleaf maple forest (*Acer macrophyllum*), non-native forest, eucalyptus groves (*predominantly blue gum, Eucalyptus globulus*), Monterey pine forest (*Pinus radiata*), coast redwood groves (*Sequoia sempervirens*), and arroyo willow (Salix lasiolepis) thickets. The arroyo willow thickets (4.14 acres) may be associated with a creek in Town and are typically characterized as riparian habitat. Forest Fragment (13.87 acres) are characterized as forests under 1.0 acres that are surrounded by disturbed areas including developed habitat. Non-native forest (581.5 acres) do not have a dominant species and is generally within neighborhoods and city streets within Hillsborough. Some non-native forests were planted with cypress, pine species, prunus species, and other trees. In addition to the GGNPC data, buckeye grove (0.09 acre) and riparian buckeye grove (1.01 acre) habitat dominated by buckeye (*Aesculus californica*) were identified on the Tobin Clark property during a site survey (WRA 2023). California buckeye groves, valley oak woodland, and Monterey pine woodland and forest are considered sensitive natural communities by CDFW. Forests, woodlands, and groves provide habitat for a variety of native wildlife including invertebrates, amphibians and reptiles, birds, and mammals.

Shrubland (84.55 acres). Approximately two percent of land within Hillsborough has shrubland vegetation. The most common shrubland vegetation in Hillsborough is mapped as coyote brush *(Baccharis pilularis)* scrub, California sagebrush *(Artemisia californica)* scrub, or chamise (*Adenostoma fasciculatum*) chaparral. Other types of shrublands mapped in Hillsborough include non-native shrubs (1.06 acres) and shrub fragments (3.46 acres), which are generally small areas of shrubland that could be landscaping within Town. Shrublands provide habitat for a variety of native wildlife including invertebrates, amphibians and reptiles, birds, and mammals.

Grassland & Herbs (38.68 acres). Approximately one percent of land within Hillsborough has grassland vegetation. All grassland vegetation in Hillsborough is mapped as Californian annual and perennial grassland, which mostly consists of non-native annual grasses that have been naturalized, such as wild oats (*Avena spp.*) and bromes (*Bromus spp.*). Perennial grassland in the planning area is dominated by bunchgrasses such as purple needle grass (*Stipa pulchra*) as well as mixed with annuals. Serpentine bunchgrass was documented just outside Town, however within the planning area. Serpentine bunchgrass and needle grass grassland are considered sensitive natural communities by CDFW. Grasslands provide habitat for a variety of wildlife including invertebrates, some amphibians, reptiles, birds, and mammals, though native

perennial grasslands have a greater diversity of plant species and provide higher quality habitat than non-native annual grasslands.

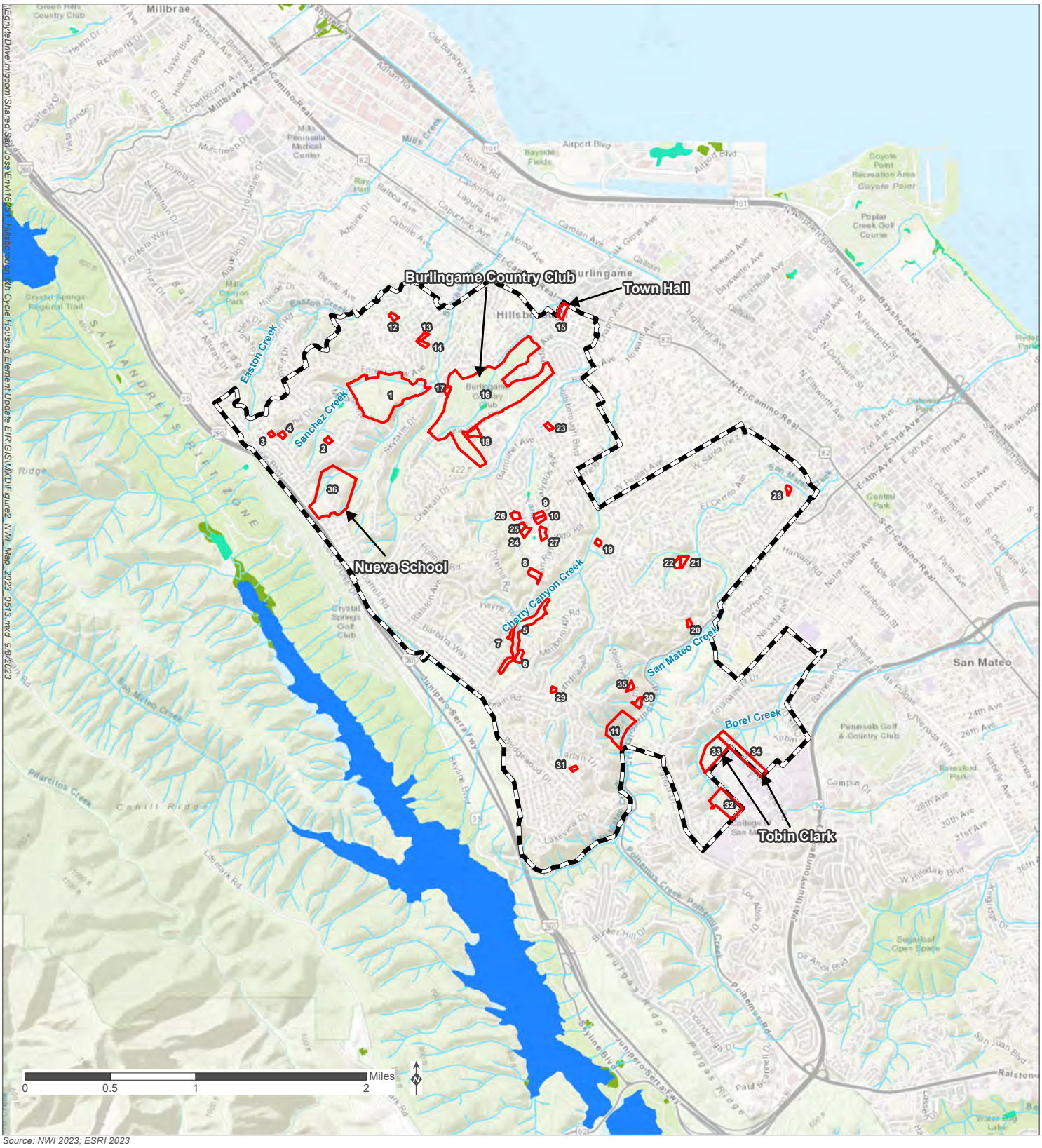
Wetlands and Waterbodies (1.71 acres). About 0.043 percent of Hillsborough has wetlands or other waterbodies. The National Wetlands Inventory Map (Figure 4.3-2) shows riverine/streams and freshwater ponds within the Planning Area, as well as the locations of all the housing opportunity sites. There are two lakes, Crocker Lake, and Spencer Lake (mapped as ponds) as well as various creeks, tributaries, and other wetlands in Hillsborough. Refer to the section on "Watersheds and Riparian Corridors" for more information on wetlands and waterbodies within the Planning Area. Wetlands and waterbodies support aquatic vegetation, abundant wildlife, including several special-status species.

Special-Status Plant and Wildlife Species

Hillsborough's hilly, densely vegetated open space areas and proximity to the San Francisco Bay and the Golden Gate National Recreation Area provide potential habitat for a variety of special-status plant and wildlife species. A list of 96 special-status plant species known to occur or that have potential to occur in the 7.5-minute series USGS San Mateo quad that contains the Town and in the eight surrounding quadrangles was compiled using the CNPS Rare Plant Inventory (CNPS 2023) and CNDDB records (CNDDB 2023). Of these, 17 plant species are listed as threatened or endangered under the Federal and/or California Endangered Species Act.

Based on this review 50 special-status animals are known to occur or have the potential to occur in the 7.5-minute series USGS San Mateo quad that contains the Town and the eight surrounding quadrangles (Redwood Point, Palo Alto, Woodside, Half Moon Bay, Montara Mountain, San Francisco South, Hunters Point, and San Leandro). Of these, 24 animal species are listed as threatened or endangered under the Federal and/or California Endangered Species Act or are candidates for listing under the Federal or California Endangered Species Act.

Special-status species with known occurrences within five miles of the center of Hillsborough were assessed for the potential to occur in the Planning Area. The assessment of the potential for special-status species to occur in the Planning Area is based on nearby records and the presence of suitable habitat within the Planning Area. Special-status species determined to have a moderate or higher potential to occur are included in Table 4.3-2 (low probability area not included) below. Refer to Appendix D for the full special-status species list.



Source: NWI 2023; ESRI 2023

Water Features

- Freshwater Emergent Wetland
- Freshwater Pond
- Lake
- Riverine

- City Boundary
- Housing Opportunity Sites

Figure 4.3-2 National Wetland Inventory and Housing Opportunity Sites

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Table 4.3-2: Special-Status Species with the Potential to Occur in the Hillsborough Planning Area[21]			
Species	**Status**	**Habitat / Requirements**	**Potential to Occur**
Plants			
San Mateo thorn-mint *Acanthomintha duttonii*	FE, SE, 1B.1	Chaparral and valley and foothill grassland/serpentinite soils. Elevation range: 50 – 300 meters (m); blooms April-June.	**Moderate.** Occurrences within five miles of Town and suitable conditions are within the Planning Area on serpentine soils.
Franciscan onion *Allium peninsulare* var. *franciscanum*	1B.2	Cismontane woodland, valley, and foothill grassland. Clay soils; often on serpentine; sometimes on volcanics. Dry hillsides. Elevation range: 5-320 m.; blooms May-June.	**Moderate.** Occurrences within five miles of Town and suitable conditions are within the Planning Area on serpentine soils.
Bent-flowered fiddleneck *Amsinckia lunaris*	1B.2	Cismontane woodland, valley and foothill grassland, coastal bluff scrub. Elevation range: 3-795 m.; blooms March-June.	**Moderate.** Occurrences within five miles of Town and suitable conditions are within the Planning Area.
Brewer's calandrinia *Calandrinia breweri*	4.2	Chaparral, coastal scrub. Elevation range: 10 -1220 m.; blooms March–June.	**Moderate.** Occurrences within five miles of Town and suitable conditions are within the Planning Area.
San Francisco collinsia *Collinsia multicolor*	1B.2	Closed-cone coniferous forest, coastal scrub. On decomposed shale (mudstone) mixed with humus; sometimes on serpentine. Elevation range: 10-275 m.; blooms March–May.	**Present.** Occurrences within San Mateo Creek Canyon and suitable conditions are within the Planning Area.
Western leatherwood *Dirca occidentalis*	1B.2	Broad-leafed upland forest, chaparral, closed-cone coniferous forest, cismontane woodland, coniferous forest, riparian forest / woodland. On brushy slopes, mesic sites. Elevation range: 20-640 m.; blooms January-March.	**Moderate.** Occurrences within five miles of Town and suitable conditions are within the Planning Area.
California bottle-brush grass *Elymus californicus*	4.3	Broad-leafed upland forest, cismontane woodland, coniferous forest, riparian woodland. Elevation: less than 500 m; blooms May-August.	**Present.** Occurrences within Town and suitable conditions are within the Planning Area.

[21] Note that Table 4.3-2: provides a generalized list of special-status species present or with the potential to occur in the Project Planning Area based on CNDDB records and general habitat types present in the Hillsborough Planning Area; no field surveys or site-specific analysis was performed. Field surveys and/or site-specific analysis could reveal additional species with the potential to occur and would be undertaken for projects when they are proposed.

Table 4.3-2: Special-Status Species with the Potential to Occur in the Hillsborough Planning Area[21]

Species	Status	Habitat / Requirements	Potential to Occur
San Mateo Woolly sunflower *Eriophyllum latilobum*	FE, CE,	Cismontane woodland (sometimes serpentinite), coastal scrub, lower montane coniferous forest. Elevation range: 100-150 m; blooms May-June.	**High.** Historical occurrences within along Crystal Springs Road and San Mateo Creek. Suitable conditions are within the Planning Area.
Hillsborough chocolate lily *Fritillaria biflora var. ineziana*	1B.1	Cismontane woodland, valley and foothill grassland. Elevation range: +or- 150 m.; blooms March–April.	**High.** Historical occurrences within Town and the Planning Area.
Marin Western flax *Hesperolinon congestum*	FT, CT,	Serpentine soils, especially in dry native bunch grasses, chaparral or other grasslands. Elevation range: 55-430m.; blooms April-July.	**Present.** Documented to occur within Planning Area between Skyline Blvd and I-280.
Crystal Springs lessingia *Lessingia micradenia var. arachnoidea*	1B.2	Serpentinite soils, often roadsides. Cismontane woodland, Coastal scrub, and valley and foothill grassland. Elevation range: 100-300 m.; blooms July-October.	**High.** Historically occurs within or near the border of the Planning Area on serpentine soils.
Arcuate bush mallow *Malacothamnus arcuatus*	1B.2	Chaparral, cismontane woodland. Gravelly alluvium. Elevation range: 1-735 m.; blooms April – September.	**Moderate.** Occurrences within five miles of Town and suitable conditions are within the Planning Area.
Woodland woollythreads *Monolopia gracilens*	1B.2	Chaparral, valley and foothill grassland, cismontane woodland, broad-leafed upland forest, coniferous forest. Sandy to rocky soils. Often seen on serpentine after burns but may have only weak affinity to serpentine. Elevation range: 100-1200 m.; blooms March-July.	**Moderate.** Occurrences within five miles of Town and suitable conditions are within the Planning Area.
Choris' popcorn flower *Plagiobothrys chorisianus var. chorisianus*	1B.2	Chaparral, coastal scrub, coastal prairie. Mesic sites. Elevation range: 5-705 m.; blooms March-June.	**Moderate.** Occurrences within five miles of Town and suitable conditions are within the Planning Area.
Chaparral ragwort *Senecio aphanactis*	2B.2	Chaparral, cismontane woodland, coastal scrub. Drying alkaline flats. Elevation range: 20-1020 m.; blooms Feb-May.	**Moderate.** Occurrences within five miles of Town and suitable conditions may occur within the Planning Area.

Wildlife			
Species	**Status**	**Habitat**	**Potential to Occur**
Invertebrates			
Western bumble bee *Bombus occidentalis*	SSA	Occurs in a wide variety of habitat types. Nests are constructed annually in pre-existing cavities, usually on the ground (e.g., mammal burrows). Many different plant species are visited and pollinated.	**Moderate.** Occurrences within five miles of Town. Nesting habitat is present in the Planning Area.
Reptiles & Amphibians			
Western pond turtle *Emys marmorata*	CSSC	A thoroughly aquatic turtle of ponds, marshes, rivers, streams, and irrigation ditches, usually with aquatic vegetation, below 6000 ft elevation. Needs basking sites and suitable (sandy banks or grassy open fields) upland habitat up to 0.5 km from water for egg-laying.	**Moderate.** Occurrences within five miles of Town and there is suitable habitat in creek and ponds are within the Planning Area.
California red-legged frog *Rana draytonii*	FT, CSSC	Lowlands and foothills in or near permanent sources of deep water with dense, shrubby, or emergent riparian vegetation. Requires 11-20 weeks of permanent water for larval development. Must have access to estivation habitat.	**High.** Critical habitat unit SNM-1 (75 Federal Register [FR] 12916, March 17, 2010), is within one mile to the west of Town. Known populations are present just west of Highway 280.
San Francisco garter snake *Thamnophis sirtalis tetrataenia*	FE, SE, CFP	Vicinity of freshwater marshes, ponds and slow-moving streams in San Mateo County and extreme northern Santa Cruz County. Prefers dense cover and water depths of at least one foot. Upland areas near water are also very important.	**High.** Historically occurs within Town. Suitable aquatic habitat and adjacent upland open space for dispersal is present within the Planning Area.
Fish			
Steelhead – Central California coast DPS *Oncorhynchus mykiss irideus*	FT	From Russian River, south to Soquel Creek & to, but not including, Pajaro River. Also San Francisco & San Pablo Bay	**High.** Occurs within the Planning Area, within one mile, or migrates through Town. Suitable aquatic habitat is present in San Mateo Creek and small numbers of anadromous steelhead may use the area below Crystal Springs Reservoir (Leidy et al. 2005)

Birds			
Cooper's hawk *Accipiter cooperii*	SSC	Typically inhabits oak savannah, woodlands, and open grassland habitats	**Present.** Known to occur within Town and suitable habitat is present within the Planning Area. ebird shows sightings in Hillsborough.
American peregrine falcon *Falco peregrinus anatum*	CFP	Occurs in a wide variety of habitats, though often associated with coasts, bays, marshes and other bodies of water. Nests on protected cliffs and on man-made structures including buildings and bridges. Preys on birds, especially waterbirds. Forages widely.	**High.** Historically occurs within Town. Suitable habitat and open space are present within the Planning Area.
Loggerhead shrike *Lanius ludovicianus*	SSC	Forages in grasslands and nests in shrubs and small trees.	**Moderate.** Occurs within five miles of Town and suitable habitat is present within the Planning Area.
Yellow-breasted chat *Icteria virens*	SSC	Riparian forest, riparian scrub, riparian woodland	**Moderate.** Occurs within five miles of Town and suitable habitat is present within the Planning Area.
Yellow warbler *Setophaga petechia*	SSC	Riparian forest, riparian scrub, riparian woodland	**Moderate.** Occurs within five miles of Town and suitable habitat is present within the Planning Area.
White-tailed kite *Elanus leucurus*	CFP	Forage in grasslands and agricultural fields; nest in riparian zones, oak woodlands, and isolated trees. Rolling foothills and valley margins with scattered oaks and river bottomlands or marshes next to deciduous woodland.	**Moderate.** Occurs within five miles of Town and suitable habitat is present within the Planning Area.
Mammals			
Pallid bat *Antrozous pallidus*	CSSC	Deserts, grasslands, shrublands, woodlands and forests. Most common in open, dry habitats with rocky areas for roosting.	**High.** Occurs within one mile of Town and suitable habitat is present within the Planning Area.
Hoary bat *Lasiurus cinereus*	CNDDB	Prefers open habitats or habitat mosaics, with access to trees for cover and open areas or habitat edges for feeding. Roosts in dense foliage of medium to large trees. Feeds primarily on moths. Requires water.	**Moderate.** Occurs within five miles of Town and suitable habitat is present within the Planning Area.
San Francisco dusky-footed woodrat	CSSC	Forest habitats of moderate canopy and moderate to dense understory. May prefer chaparral and redwood habitats.	**Present.** Known to occur in Town and suitable habitat is

Neotoma fuscipes annectens		Constructs nests of shredded grass, leaves and other material.	present within the Planning Area.
Mountain lions *Puma concolor*	SSA	Pine forests, riparian and oak woodlands, streams, chaparral, and grasslands. Dens are often in rocky outcrops or dense vegetation.	**Present.** Known to occur within Town and suitable habitat is present within the Planning Area.
Sources: Hillsborough General Plan 2005; CNDDB 2023 eBird 2023; iNaturalist 2023.			

Listing Status and Potential to Occur Descriptions		
FE = Listed as endangered under the Federal Endangered Species Act. FT = Listed as threatened under the Federal ESA. SSA = Species Status AssessmentCalifornia SE = Listed as endangered under the California ESA. ST = Listed as threatened under the California Endangered Species Act. CSSC = Listed as a species of special concern in California. CFP = Listed as fully protected in California CNDDB = Species tracked by the CNDDB	California Rare Plant Rank (CRPR) 1B.1 = Plants Rare, Threatened, or Endangered in California and Elsewhere. Seriously threatened in CA. 1B.2 = Plants Rare, Threatened, or Endangered in California, But More Common Elsewhere. Fairy threatened in CA. 2B.2 = Plants rare, threatened, or endangered in California, but more common elsewhere; fairly threatened in CA. 4.2 = Plants of limited distribution; fairly threatened in CA. 4.3 = Plants of limited distribution; not very threatened in CA.	Moderate Potential. The CNDDB records the species outside of the Town of Hillsborough, but within a 5-mile radius and suitable habitat is present within the Planning Area. High Potential: There are CNDDB records of the species within one mile of Hillsborough and suitable habitat is present within the Planning Area. Present: There are recent CNDDB records (within ten years) of the species in Hillsborough. Species is known to occur within the Planning Area.

Of the 96 special status plant species, 81 are not included in Table 4.3-2 above. These 81 plant species have a low or no potential to occur in the Project Planning Area due to one or more of the following reasons:

- Specific hydrologic conditions, such as seasonal wetlands or tidal waters, are absent;
- Not currently mapped in the Planning Area and suitable habitat necessary to support the special-status plant species are absent;
- Outside of the known elevation and range;
- Specific edaphic conditions or soil types are absent;
- Common associated plant species and vegetation communities are absent; and

- A viable seed bank is unlikely to be present due to historic and contemporary soil alterations of the surrounding area.

Of the 50 special-status animal species, 35 are not included in Table 4.3-2 above. These 35 animal species have a low or no potential to occur in the Project Planning Area due to a lack of suitable habitat for one or more of the following reasons:

- The species occurs in the bay or ocean;
- Coastal marsh habitat and beaches are not present;
- Habitat necessary to provide nesting, foraging, or cover habitat to support special-status wildlife species is not present;
- Host plants necessary to provide larval and nectar resources required for the completion of life cycles for specific special-status insects are not present; and,
- The Project Planning Area is outside of the special-status wildlife species' documented range.

Sensitive Natural Communities and Vegetation Alliances.

Sensitive natural communities are vegetation types, associations, or sub-associations that support concentrations of special-status plant and/or wildlife species, are of relatively limited distribution, and/or are of particular value to wildlife. Natural Communities are evaluated using NatureServe's Heritage Methodology, the same system used to assign global and State rarity ranks for plant and animal species in the CNDDB (Faber et al. 2012). Evaluation is done at both the Global (full natural range within and outside of California) and State (within California) levels resulting in a single G (global) and S (State) rank ranging from 1 (very rare and threatened) to 5 (demonstrably secure). According to the CDFW Vegetation Program, Natural Communities with State ranks of S1-S3 and certain other specified associations are considered imperiled, and thus, potentially of special concern. Natural Communities with these ranks are generally addressed during CEQA environmental review with compensatory mitigation prescribed for impacts as applicable.

Seven natural communities classified by CDFW as sensitive natural communities (Rank 1-3) are reported to occur within the USGS San Mateo quad and eight surrounding 7.5-minute series quadrangles (Redwood Point, Palo Alto, Woodside, Half Moon Bay, Montara Mountain, San Francisco South, Hunters Point, and San Leandro) (CNDDB 2023). These communities are California buckeye groves (Rank G3/S3), Monterey pine forest and woodland (G3/S3), northern coastal salt marsh (Rank S3/G3), northern maritime chaparral (S1/G1), valley oak woodland (Rank G3/S2), serpentine bunchgrass (Rank G2/S2), and valley needlegrass grassland (Rank G3/S3).

Five sensitive terrestrial land cover types are known to occur within the Planning Area (California buckeye groves, Monterey pine woodland and forest, valley oak woodland, serpentine bunchgrass, and valley needle grass grassland) (see Figure 4.3-1 Land Cover and Vegetation Communities). In February 2023, WRA conducted a biological survey on the Tobin Clark housing opportunity site and all of these sensitive land cover types were documented on the property, except serpentine bunchgrass (WRA 2023). Serpentine bunchgrass was documented in 1998 at Buri Buri Ridge south of San Andreas Lake and north of the Crystal Springs Golf Course. The serpentine bunchgrass was on a southwest facing slope at the crest of the ridge stretching for over a mile. There was also a large patch documented southeast of

Crystal Springs golf course and on Pulgas Ridge east of upper and Lower Crystal Springs Reservoir within the Planning Area. Soils were documented as serpentine derived Obispo clay and Fagan loam.

Figure 4.3-1 shows the land cover and vegetation communities, however, while this provides information about current conditions, a site-specific biological site evaluation will be necessary for future residential development proposals on the subdivision opportunity sites to verify whether sensitive land cover types are present. Some of the sensitive natural communities and vegetation alliances were identified in the 2023 visual site surveys conducted for this EIR, however not all 36 housing opportunity sites were accessible. Detailed information from visual site surveys are in the section on “Biological Resources in the Housing Element Opportunity Sites.”

Watersheds and Riparian Corridors

The USFWS National Wetlands Inventory (NWI) provides detailed information on the abundance, characteristics, and distribution of wetlands. Some wetland and stream features, such as freshwater seeps and springs, are generally not identified as part of the NWI because of the general scale of the mapping effort. The Town of Hillsborough’s designated open space lands support two lakes, Crocker Lake, and Spencer Lake (owned by the Town) as well as various creeks, tributaries, seeps, and other wetlands (see Figure 4.3-2). Crocker Lake is a 1.4-acre reservoir situated in a steep 60-acre canyon, which has an associated great blue heron rookery, as well as historic raptor nests in several trees and snags surrounding the lake (May and Associates 2008). Spencer Lake is a small shallow pond with a maximum depth of 6 feet, and surface area of approximately 0.23 acres and like Crocker Lake, Spencer Lake provides important habitat for dependent plant and wildlife species, including a variety of aquatic species (fish, amphibians), hydrophytic plants, and important wildlife and bird habitat (May and Associates 2008).

Major wetland and waterbodies in Hillsborough are shown in Figure 4.3-2 National Wetland Inventory Map. Wetland features that have been mapped either in or near Hillsborough include freshwater emergent wetland, freshwater pond, lake, and riverine. Natural drainages are divided into four main watersheds: from north to south are Mills, Sanchez, San Mateo, and Pulgas watersheds, all of which have tributaries and ultimately flow to San Francisco Bay. Many of the creeks and tributaries are not recharged by groundwater, thus are intermittent and generally flow during the winter wet-weather season and from landscape irrigation runoff during the dry months. San Mateo Creek and Easton Creek are perennial creeks. Easton Creek, Sanchez Creek, Dry Creek, Cherry Canyon Creek, Borel Creek, and San Mateo Creek, as well as natural drainages in Hillsborough are likely subject to U.S. Army Corps of Engineers (USACE) jurisdiction under section 404 of the Clean Water Act. In addition, these features are within CDFW and Regional Water Quality Control Board jurisdiction.

Critical Habitat

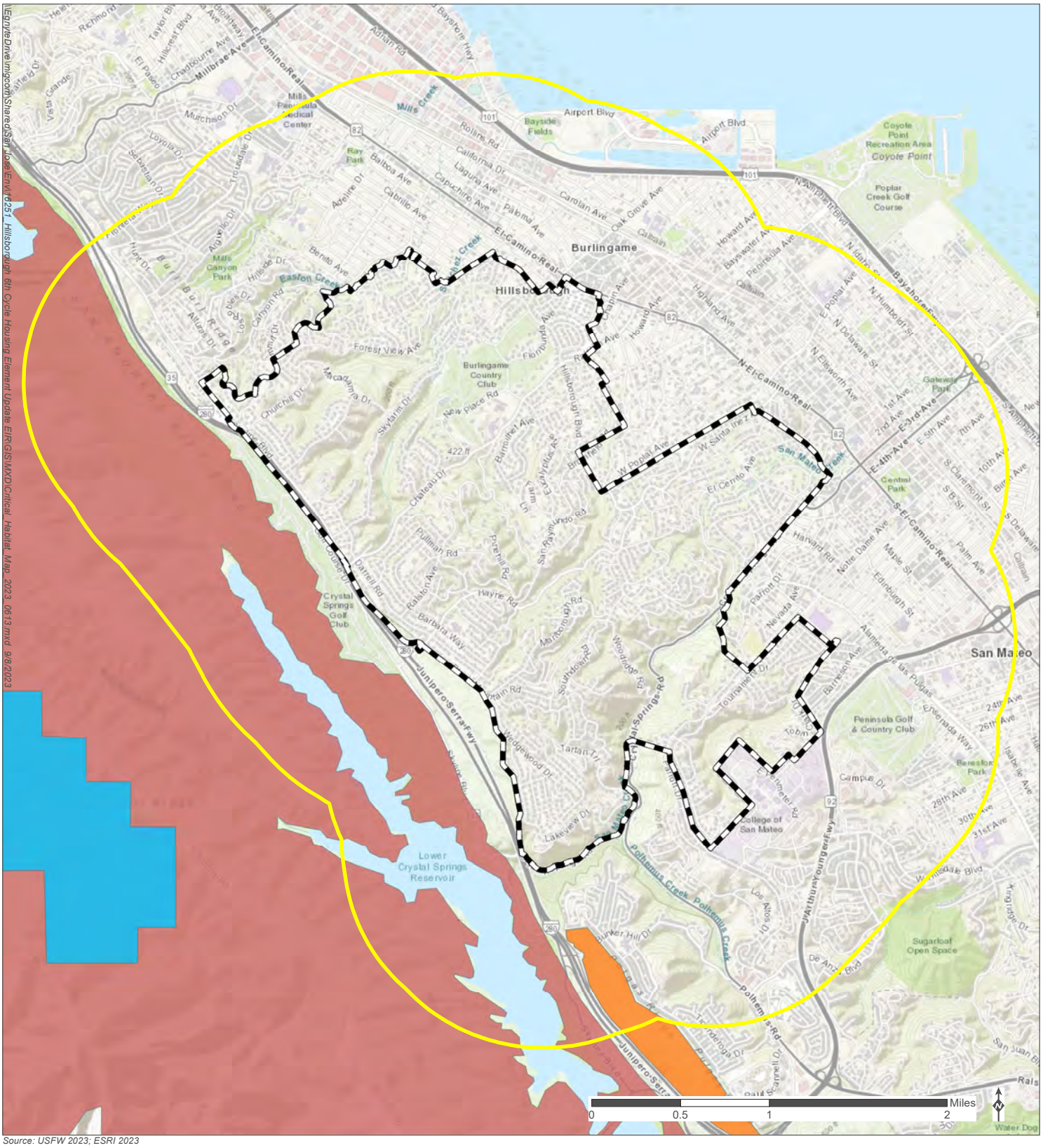
Critical habitat is a term defined in the Endangered Species Act as a specific geographic area that contains features essential for the conservation of a threatened or endangered species and that may require special management and protection. Hillsborough does not contain designated critical habitat, however there is critical habitat for California red-legged frog and Bay

checkerspot butterfly within one mile of the Project Planning Area. Bay checkerspot butterfly critical habitat is within the planning area, however this species is considered extirpated from the area. Bay checkerspot butterfly only occurs in serpentine grassland that supports its host plant (*Plantago erecta* as primary, and *Orthocarpus densiflorus* or *O. purpurascens* and secondary) and nectar plants *(Lasthenia chrysostoma, Layia platyglossa, Allium breweri,* and *Lomatium* spp.) (Murphy and Weiss 1988). The patch size of the serpentine grassland must be large enough for the species to persist, and prime habitat for this species includes a diversity of microclimates that extend the availability of the annual plants used by the butterfly to reproduce. The Bay checkerspot butterfly occurred in the Hillsborough Planning Area, San Bruno Mountain, Edgewood County Park, and Jasper Ridge Biological Preserve in the past but was extirpated. The only known current location for this species is in Coyote Valley, in south San Jose. In recent years there have been efforts to re-introduce the butterfly to Edgewood County Park. The cause of Bay checkerspot butterfly extinction in Hillsborough was from freeway construction and suburbanization (Murphy and Weiss 1988). There are no large and micro-climatically diverse patches of native serpentine grassland in the Planning Area, and this species is not expected to persist in the Planning Area.

Additionally, critical habitat for marbled murrelet is located west of Skyline Boulevard (Hwy 35) just outside the town 1-mile buffer (Figure 4.3-3 Critical Habitat Map). The Planning Area is not close enough to the ocean to provide suitable habitat for marbled murrelet.

Protecting and enhancing habitat connectivity and functional movement corridors between the remaining natural areas is essential to sustaining populations and allowing for the continued dispersal of native plant and animal species. Natural linkages include the undeveloped woodlands, riparian corridors and drainages, undeveloped hillsides, and corridors across properties where impermeable barriers such as exclusionary fencing, and heavily traveled roadways have not yet eliminated options for wildlife movement and plant dispersal. While narrow corridors may be the only option in many locations due to the extent of existing development, habitat linkages are most effective through maintenance of a permeable landscape (i.e., one that allows for uninhibited movement of species across large areas).

There is one known wildlife nursery site at Crocker Lake in Hillsborough which was documented as a great blue heron nesting site (May and Associates 2008). Additionally, San Mateo Creek in Hillsborough may contain steelhead spawning (Leidy et al. 2005), however current surveys would need to be conducted to confirm the continued presence of these resources.



Source: USFW 2023; ESRI 2023

Hillsborough City Boundary

Biological Study Area

Bay Checkerspot Butterfly- *Euphydryas editha* ssp. *bayensis*

California red-legged frog- *Rana draytonii*

Marbled Murrelet- *Brachyramphus marmoratus*

Figure 4.3-3 Critical Habitat

Biological Resources in the Housing Element Opportunity Sites

The Draft 2023-2031 Housing Element identifies 23 vacant parcels suitable for development of one single-family house each (Approach 3), three large parcels for subdivision into single-family lots, and the Tobin Clark site that could be developed with several multi-family buildings and 100 units. The parcels identified for subdivision include 2260 Redington Road (49.52 acres) with the potential to develop 35 single-family homes, 50 Brooke Court (11.64 acres) with the potential to develop three single-family homes, and Hayne Road (10.90 acres) with the potential to develop five single-family homes. There are a total of 36 housing opportunity sites (shown on Figure 4.3-1 and Figure 4.3-2), which are listed below with biological resource details and survey recommendations. In addition, up to 400 Accessory Dwelling Units (ADUs) could be built on any residential lot (Approach 1). Any ADUs would be built within an existing property footprint that is already impacted by housing development and would be reviewed by the Town for the potential to impact biological resources when a building permit application is submitted (See section 4.3.5). Providing utilities to the Tobin Clark site may require extending water, wastewater and possibly stormwater runoff pipelines from the Town near Brooke Court through the undeveloped portions of the Tobin Clark site to the area proposed for development. The construction of these pipelines could result in significant impacts to biological resources.

The following parcel analysis was based on a review of aerial photos, vegetation data, CNDDB, and a site visit in 2023. Refer to Figure 4.3-1 and Figure 4.3-2 for the location corresponding to the number below for the housing opportunity sites.

1. 2260 Redington Road Parcel (APN 028040120) is a 49.5-acre lot split opportunity site just north of Burlingame Country Club and is a partially undeveloped, densely vegetated parcel containing eucalyptus groves and mixed oak woodland. Sanchez Creek runs through the parcel and is upstream of Spencer Lake. This parcel supports potential California red-legged frog (CRLF) upland habitat. The Town's development review process would require a biological survey at the time a development application is submitted to determine project impacts to biological resources, including woodland and special-status species, and identify project-specific mitigation.

2. Undeveloped parcel (APN 028443010) supports coast live oak and California bay laurel woodland and is approximately 300 feet from Sanchez Creek. It provides potential refugia habitat for CRLF. The Town's development review process would require a biological survey at the time a development application is submitted to determine project impacts to biological resources, including woodland and special-status species, and identify project-specific mitigation.

3. Undeveloped parcel (APN 028484050) supports Eucalyptus trees, which is suitable for raptors nesting. A biological survey is not required, however a survey to determine that no active nests or roosts would be impacted is recommended.

4. Undeveloped parcel (APN 028483030) supports coast live oak and arroyo willow. The Town's development review process would require a biological survey at the time a development application is submitted to determine project impacts to biological resources, including riparian habitat, and identify project-specific mitigation.

5. Hayne Road (APN 030191030) is a long narrow 11.6-acre lot split opportunity site that was mostly inaccessible during the 2023 site visit. The site supports oak forest, buckeye, California bay, cypress sp., and is approximately 0.5 mile from a CRLF population. Cherry Canyon Creek runs through parcel. The Town's development review process would require a biological survey at the time a development application is submitted to determine project impacts to biological resources, including special-status species, and identify project-specific mitigation.

6. Undeveloped parcel (APN 030161040) was mostly inaccessible for a field visit in 2023. This site supports oak forest, buckeye, California bay, cypress sp., and is approximately 0.5 mile from a CRLF population. Cherry Canyon Creek runs through parcel. The Town's development review process would require a biological survey at the time a development application is submitted to determine project impacts to biological resources, including special-status species, and identify project-specific mitigation.

7. Undeveloped parcel (APN 030097010) was mostly inaccessible for a field visit in 2023. This site supports oak forest, buckeye, California bay, cypress sp., and is approximately 0.5 mile from a CRLF population. Cherry Canyon Creek runs through parcel. The Town's development review process would require a biological survey at the time a development application is submitted to determine project impacts to biological resources, including special-status species, and identify project-specific mitigation.

8. 275 Robin Road (APN 030091040) was mostly inaccessible for a field visit in 2023. This site supports oak forest, buckeye, California bay, cypress sp., and is approximately 0.5 mile from a CRLF population. Cherry Canyon Creek runs through the site. The Town's development review process would require a biological survey at the time a development application is submitted to determine project impacts to biological resources, including special-status species, and identify project-specific mitigation.

9. Undeveloped parcel (APN 031370370) was a partially disturbed (e.g., regularly mowed) site composed of 95% non-native annual grassland with planted coastal redwood and coast live oak along road. The Town's development review process would require a biological survey at the time a development application is submitted to determine project impacts to biological resources and identify project-specific mitigation.

10. Undeveloped parcel (APN 031370380) was a partially disturbed (e.g., regularly mowed) site composed of 95% non-native annual grassland with planted coastal redwood and coast live oak along road. The Town's development review process would require a biological survey at the time a development application is submitted to determine project impacts to biological resources and identify project-specific mitigation.

11. Undeveloped parcel (APN 038121160) was mostly inaccessible during the time of the 2023 site visit. The site is adjacent to San Mateo Creek and supports maples, oak woodland, and willows. A portion of parcel appears to be suitable upland habitat for CRLF. The Town's development review process would require a biological survey at the time a development application is submitted to determine project impacts to biological resources, including woodland and special-status species, and identify project-specific mitigation.

12. 85 Fagan Drive (APN 027330630) is partially developed with non-native forest. Easton Creek is approximately 650 feet from the parcel. A biological survey is not required, however a pre-construction survey to determine that no active nests or roosts would be impacted would be required prior to the start of construction.

13. Partially developed parcel (APN 028061080) supports oak woodland. A biological survey is recommended for non-developed portion of parcel. The Town's development review process would require a biological survey at the time a development application is submitted to determine project impacts to biological resources, including woodland and special-status species, and identify project-specific mitigation.

14. Partially developed parcel (APN 028061100) supports non-native forest landcover. A biological survey is not required due to the non-native habitat and development, however a pre-construction survey to determine that no active nests or roosts would be impacted would be required prior to the start of construction.

15. 1600 Floribunda Avenue (APN 028141090) is a completely developed parcel. A biological survey is not required due to the development, however a pre-construction survey to determine that no active nests or roosts would be impacted would be required prior to the start of construction.

16. 80 New Place Road (Burlingame Country Club) (APN 028180250) is a mostly developed parcel that supports non-native forest habitat. There is a pond on site that is connected to Terrace Creek which is adjacent to Sanchez Creek. CLRF populations are approximately 1.25 miles from the site with partial connectivity. The Town's development review process would require a biological survey at the time a development application is submitted to determine project impacts to biological resources and identify project-specific mitigation.

17. Partially developed parcel (APN 028352070) supports non-native forest landcover. A biological survey is not required, however a pre-construction survey to determine that no active nests or roosts would be impacted would be required prior to the start of construction.

18. Developed parcel (APN 028520010) landcover appeared to be regularly mowed. A biological survey is not required, however a pre-construction survey to determine that no active nests or roosts would be impacted would be required prior to the start of construction.

19. Partially developed parcel (APN 031110360) supports oak woodland. Cherry Canyon Creek is approximately 150 feet from the parcel. The Town's development review process would require a biological survey at the time a development application is submitted to determine project impacts to biological resources, including woodland and special-status species, and identify project-specific mitigation.

20. 30 Buckeye Court (APN 031250150) is a partially developed parcel that supports oak woodland and is approximately 450 feet from San Mateo Creek. The Town's development review process would require a biological survey at the time a development

application is submitted to determine project impacts to biological resources, including woodland and special-status species, and identify project-specific mitigation.

21. Mostly developed parcel (APN 031300110) supports oak woodland and California bay woodland and is approximately 150 feet from San Mateo Creek. The Town's development review process would require a biological survey at the time a development application is submitted to determine project impacts to biological resources, including woodland and special-status species, and identify project-specific mitigation.

22. Mostly developed parcel (APN 031300190) supports California bay woodland and is approximately 150 feet from San Mateo Creek. The Town's development review process would require a biological survey at the time a development application is submitted to determine project impacts to biological resources, including woodland and special-status species, and identify project-specific mitigation.

23. 1000 Barroilhet Avenue (APN 031364130) is developed with non-native forest and there is a small creek along the edge of parcel. Ralston Creek is approximately 600 feet north of parcel. The Town's development review process would require a biological survey at the time a development application is submitted to determine project impacts to biological resources and identify project-specific mitigation.

24. Undeveloped parcel (APN 031372010) supports oak woodland and Monterey cypress stands. The Town's development review process would require a biological survey at the time a development application is submitted to determine project impacts to biological resources and identify project-specific mitigation.

25. Undeveloped parcel (APN 031372020) supports planted redwoods along road and a portion is non-native annual grassland that appears to be regularly mowed. The Town's development review process would require a biological survey at the time a development application is submitted to determine project impacts to biological resources and identify project-specific mitigation.

26. Undeveloped parcel (APN 031372040) supports non-native annual grasslands. The Town's development review process would require a biological survey at the time a development application is submitted to determine project impacts to biological resources and identify project-specific mitigation.

27. Undeveloped (APN 031372060) parcel supports non-native forest and oak woodland. The Town's development review process would require a biological survey at the time a development application is submitted to determine project impacts to biological resources and identify project-specific mitigation.

28. 65 Bridge Road (APN 032421070) is a developed parcel with sparse coastal redwoods and is approximately 90 feet from San Mateo Creek. The Town's development review process would require a biological survey at the time a development application is submitted to determine project impacts to biological resources, including riparian and wetlands resources within San Mateo creek, and identify project-specific mitigation.

29. Undeveloped parcel (APN 038014020) supports ornamental trees and partially non-native annual grassland. The site is approximately 0.5 mile from a known CRLF population. The Town's development review process would require a biological survey at the time a development application is submitted to determine project impacts to biological resources and identify project-specific mitigation.

30. Undeveloped parcel (APN 038121270) supports oak woodlands and is approximately 350 feet from San Mateo Creek. The Town's development review process would require a biological survey at the time a development application is submitted to determine project impacts to biological resources and identify project-specific mitigation.

31. 70 Glengarry Drive (APN 038264030) is developed and non-native landcovers dominate the parcel. A biological survey is not required, however a pre-construction survey to determine that no active nests or roosts would be required before the start of construction.

32. 50 Brooke Court is an undeveloped parcel (APN 038281280) that is a 10.9-acre lot split opportunity site on the south end of town associated with Borel and San Mateo Creek and their tributaries (within or adjacent). This site supports oak woodland and non-native annual grassland, and Borel Creek runs along the edge of parcel. The Town's development review process would require a biological survey at the time a development application is submitted to determine project impacts to biological resources and identify project-specific mitigation.

33. Tobin Clark parcels (APN 038281300 and APN 038-281-310) are a 20.9-acre site associated with the tributaries of San Mateo Creek. Refer to the WRA 2023 report for details on biological resources and recommendations (see Appendix C). This site would be subject to a separate environmental review process once a development application is submitted.

34. Tobin Clark parcels (APN 038281300 and APN 038-281-310) are a 20.9-acre site associated with the tributaries of San Mateo Creek. Refer to the WRA 2023 report for details on biological resources and recommendations (see Appendix C). This site would be subject to a separate environmental review process once a development application is submitted.

35. Undeveloped parcel (APN 038390170) supports oak woodlands and is approximately 500 feet from San Mateo Creek. The Town's development review process would require a biological survey at the time a development application is submitted to determine project impacts to biological resources and identify project-specific mitigation.

36. Nueva School parcel (APN 028040120) is a 49.5-acre lot split opportunity site just north of Burlingame Country Club. The site is mostly developed with non-native forests, oak woodlands, and a known CRLF population is approximately 0.25 mile away. There are two ponds approximately 0.25 miles away from the parcel. The Town's development review process would require a biological survey at the time a development application is submitted to determine project impacts to biological and identify project-specific mitigation.

A biological survey of the Tobin Clark site completed in 2023 documented needle grass grassland, coast live oak woodland, California buckeye groves, California sagebrush scrub, coast live oak woodland, riparian California buckeye groves, and ephemeral streams (WRA 2023) (see Appendix C). Disturbance of any sensitive land cover types are potentially significant impacts under CEQA. Impacts to ephemeral streams may require permits from the U.S. Army Corps of Engineers, CDFW, and the Regional Water Quality Control Board (RWQCB); and impacts to riparian land cover above the top of bank may also require a permit from CDFW.

4.3.3 Regulatory Setting

Federal

Federal Endangered Species Act

The Federal Endangered Species Act (FESA) of 1973, as amended, provides the regulatory framework for the protection of plant and animal species (and their associated critical habitats), which are formally listed, proposed for listing, or candidates for listing as endangered or threatened under FESA. FESA has the following four primary components: (1) provisions for listing species, (2) requirements for consultation with the United States Fish and Wildlife Service (USFWS) and the National Oceanic and Atmospheric Administration's National Marine Fisheries Service (NOAA Fisheries), (3) prohibitions against "taking" (i.e., harassing, harming, hunting, shooting, wounding, killing, trapping, capturing, or collecting, or attempting to engage in any such conduct) of listed species, and (4) provisions for permits that allow incidental "take". FESA also discusses recovery plans and the designation of critical habitat for listed species.

Both the USFWS and NOAA Fisheries share the responsibility for administration of FESA. Section 7 requires federal agencies, in consultation with, and with the assistance of the USFWS or NOAA Fisheries, as appropriate, to ensure that actions they authorize, fund, or carry out are not likely to jeopardize the continued existence of threatened or endangered species or result in the destruction or adverse modification of critical habitat for these species. Non-federal agencies and private entities can seek authorization for take of federally listed species under Section 10 of FESA, which requires the preparation of a habitat conservation plan (HCP).

U.S. Migratory Bird Treaty Act

The U.S. Migratory Bird Treaty Act (MBTA; 16 USC §§ 703 et seq., Title 50 Code of Federal Regulations [CFR] Part 10) states it is "unlawful at any time, by any means or in any manner, to pursue, hunt, take, capture, kill; attempt to take, capture or kill; possess, offer for sale, sell, offer to barter, barter, offer to purchase, purchase, deliver for shipment, ship, export, import, cause to be shipped, exported, or imported, deliver for transportation, transport or cause to be transported, carry or cause to be carried, or receive for shipment, transportation, carriage, or export any migratory bird, any part, nest, or egg of any such bird, or any product, whether or not manufactured, which consists, or is composed in whole or in part, of any such bird or any part, nest or egg thereof…" In short, under MBTA it is illegal to disturb a nest that is in active use, since this could result in killing a bird, destroying a nest, or destroying an egg. The USFWS enforces MBTA. The MBTA does not protect some birds that are non-native or human-introduced or that belong to families that are not covered by any of the conventions implemented by MBTA.

Clean Water Act

The Clean Water Act (CWA) is the primary federal law regulating water quality. The implementation of the CWA is the responsibility of the U.S. Environmental Protection Agency (EPA). However, the EPA depends on other agencies, such as the individual states and the United States Army Corps of Engineers (USACE), to assist in implementing the CWA. The objective of the CWA is to "restore and maintain the chemical, physical, and biological integrity of the Nation's waters." Section 404 and 401 of the CWA apply to activities that would impact waters of the U.S. The USACE enforces Section 404 of the CWA and the California State Water Resources Control Board (SWRCB) enforces Section 401. Section 402 of the CWA authorizes the EPA to regulate water quality in California by controlling the discharge of pollutants to water bodies from point and non-point sources.

State

California Environmental Quality Act (CEQA) Guidelines

CEQA Guidelines Section 15380 defines endangered, threatened, and rare species for purposes of CEQA and clarifies that CEQA review extends to other species that are not formally listed under the state or federal Endangered Species acts but that meet specified criteria. The state maintains a list of sensitive, or "special-status," biological resources, including those listed by the state or federal government or the California Native Plant Society (CNPS) as endangered, threatened, rare or of special concern due to declining populations. During CEQA analysis for a proposed project, the CNDDB is usually consulted. CNDDB relies on information provided by the California Department of Fish and Wildlife (CDFW), USFWS, and CNPS, among others. Under CEQA, the lists kept by these, and any other widely recognized organizations are considered when determining the impact of a project.

California Endangered Species Act

The California Endangered Species Act (CESA; Fish and Game Code 2050 et seq.) generally parallels FESA. It establishes the policy of the State to conserve, protect, restore, and enhance threatened or endangered species and their habitats. Section 2080 of the California Fish and Game Code prohibits the take, possession, purchase, sale, and import or export of endangered, threatened, or candidate species, unless otherwise authorized by permit or by the regulations. "Take" is defined in Section 86 of the California Fish and Game Code as to "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." This definition differs from the definition of "take" under FESA. CESA is administered by CDFW. CESA allows for take incidental to otherwise lawful projects but mandates that State lead agencies consult with the CDFW to ensure that a project would not jeopardize the continued existence of threatened or endangered species.

Native Plant Protection Act

The Native Plant Protection Act (NPPA) was created in 1977 with the intent to preserve, protect, and enhance rare and endangered plants in California (California Fish and Game Code sections 1900 to 1913). The NPPA is administered by CDFW, which has the authority to designate native plants as endangered or rare and to protect them from "take." CDFW maintains a list of plant species that have been officially classified as endangered, threatened, or rare. These special-

status plants have special protection under California law and projects that directly impact them may not qualify for a categorical exemption under CEQA guidelines.

Other Sensitive Plants – California Native Plant Society.

The CNPS is a non-profit plant conservation organization that publishes and maintains an Inventory of Rare and Endangered Vascular Plants of California in both hard copy and electronic version (http://www.rareplants.cnps.org/).

The Inventory assigns plants to the following categories:

1A. Presumed extinct in California;

1B. Rare, threatened, or endangered in California and elsewhere;

2. Rare, threatened, or endangered in California, but more common elsewhere;

3. Plants for which more information is needed – A review list; and

4. Plants of limited distribution – A watch list.

Additional endangerment codes are assigned to each taxon as follows:

1. Seriously endangered in California (over 80% of occurrences threatened/high degree of immediacy of threat).

2. Fairly endangered in California (20-80% occurrences threatened).

3. Not very endangered in California (<20% of occurrences threatened or no current threats known).

Plants that are Rank 1A, 1B, and 2 of the CNPS Inventory consist of plants that may qualify for listing by the CDFW, as well as other state agencies (e.g., California Department of Forestry and Fire Protection). As part of the CEQA process, such species should be fully considered, as they meet the definition of threatened or endangered under the NPPA and Sections 2062 and 2067 of the California Fish and Game Code. California Rare Plant Rank 3 and 4 species are plants in which more information is needed or are uncommon enough that their status should be regularly monitored. Such plants may be or may become eligible for state listing, and CNPS and CDFW recommend that these species be evaluated for consideration during the preparation of CEQA documents.

Fully Protected Species and Species of Special Concern

The classification of California fully protected (CFP) species was the CDFW's initial effort to identify and provide additional protection to those animals that were rare or faced possible extinction. Lists were created for fish, amphibians and reptiles, birds, and mammals. Most of the species on these lists have subsequently been listed under CESA and/or FESA. The Fish and Game Code sections (§5515 for fish, §5050 for amphibian and reptiles, §3511 for birds, §4700 for mammals) deal with CFP species and state that these species "…may not be taken or possessed at any time and no provision of this code or any other law shall be construed to

authorize the issuance of permits or licenses to take any fully protected species" (CDFW Fish and Game Commission 1998). "Take" of these species may be authorized for necessary scientific research. This language makes the CFP designation the strongest and most restrictive regarding the "take" of these species. In 2003, the code sections dealing with CFP species were amended to allow the CDFW to authorize take resulting from recovery activities for state-listed species.

California species of special concern (CSSC) are broadly defined as animals not listed under FESA or CESA, but which are nonetheless of concern to CDFW because they are declining at a rate that could result in listing, or historically occurred in low numbers and known threats to their persistence currently exist. This designation is intended to result in special consideration for these animals by CDFW, land managers, consulting biologists, and others, and is intended to focus attention on the species to help avert the need for costly listing under FESA and CESA, and cumbersome recovery efforts that might ultimately be required. This designation also is intended to stimulate collection of additional information on the biology, distribution, and status of poorly known at-risk species, and focus research and management attention on them. Although these species generally have no legal status, they are given special consideration under CEQA during project review.

Nesting Birds

Nesting birds, including raptors, are protected under California Fish and Game Code Section 3503, which reads, "It is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto." In addition, under California Fish and Game Code Section 3503.5, "it is unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto." Passerines and non-passerine land birds are further protected under California Fish and Game Code 3513. As such, CDFW typically recommends surveys for nesting birds that could potentially be directly (e.g., actual removal of trees/vegetation) or indirectly (e.g., noise disturbance) impacted by project-related activities. Disturbance during the breeding season could result in the incidental loss of fertile eggs or nestlings, or otherwise lead to nest abandonment. Disturbance that causes nest abandonment and/or loss of reproductive effort is considered "take" by CDFW.

Non-Game Mammals

Sections 4150-4155 of the California Fish and Game Code protects non-game mammals, including bats. Section 4150 states "A mammal occurring naturally in California that is not a game mammal, fully protected mammal, or fur-bearing mammal is a nongame mammal. A non-game mammal may not be taken or possessed except as provided in this code or in accordance with regulations adopted by the commission." The non-game mammals that may be taken or possessed are primarily those that cause crop or property damage. Bats are classified as a non-game mammal and are protected under California Fish and Game Code, in addition to being protected if they are a listed species (e.g., CSSC, CFP, state or federal threatened, or state or federal endangered).

Sensitive Vegetation Communities

Sensitive vegetation communities are natural communities and habitats that are either unique in constituent components, of relatively limited distribution in the region, or are of particularly high wildlife value. These communities may or may not necessarily contain special-status species. Sensitive natural communities are usually identified in local or regional plans, policies, or regulations, or by the CDFW (i.e., CNDDB) or the USFWS. The CNDDB identifies a number of natural communities as rare, which are given the highest inventory priority. Impacts to sensitive natural communities and habitats must be considered and evaluated under CEQA (CCR: Title 14, Div. 6, Chap. 3, Appendix G).

California Fish and Game Code Sections 1600-1607

Sections 1600-1607 of the California Fish and Game Code require that a Notification of Lake or Streambed Alteration application be submitted to CDFW for "any activity that may substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake." CDFW reviews the proposed actions in the application and, if necessary, prepares a Lake or Streambed Alteration Agreement (LSAA or SAA), that includes measures to protect affected fish and wildlife resources.

Porter-Cologne Water Quality Control Act

The intent of the Porter-Cologne Water Quality Control Act (Porter-Cologne) is to protect water quality and the beneficial uses of water, and it applies to both surface and ground water. Under this law, the State Water Resources Control Board develops statewide water quality plans, and the Regional Water Quality Control Boards (RWQCBs) develop basin plans, which identify beneficial uses, water quality objectives, and implementation plans. The RWQCBs have the primary responsibility to implement the provisions of both statewide and basin plans. Waters regulated under Porter-Cologne, referred to as "waters of the State," include isolated waters that are not regulated by the USACE. Projects that require a USACE permit, or fall under other federal jurisdiction, and have the potential to impact waters of the State are required to comply with the terms of the Water Quality Certification Program. If a proposed project does not require a federal license or permit, any person discharging, or proposing to discharge, waste (e.g., soil) to waters of the State must file a Notice of Intent (NOI) or a Report of Waste Discharge and receive either waste discharge requirements (WDRs) or a waiver to WDRs before beginning the discharge.

California Oak Woodlands Conservation Act

The California Oak Woodlands Conservation Act was enacted in 2001 to protect oak woodland habitats that were being diminished due to development, firewood harvesting, and agricultural conversions. The Oak Woodlands Conservation Program was established to provide funding opportunities for private landowners, conservation organizations, and cities and counties to conserve and restore oak woodlands. The program authorizes the Wildlife Conservation Board to purchase oak woodland conservation easements and provide grants for land improvements and oak restoration efforts.

Local

Hillsborough General Plan

The General Plan and other local policies and ordinances contain goals to protect fish, wildlife, and their habitats, including rare and endangered species, and to conserve and restore riparian vegetation and habitat. All future projects that are facilitated by the Housing Element Update will be evaluated for compliance with relevant policies and implementing programs that protect biological resources. The following adopted 2005 General Plan policies address biological resources protection and reflect the State CEQA Guidelines protection of biological resources.

Policy OSC-2.1 - Continue to maintain Town-owned open space in a manner that balances the need to protect natural habitat with controlling vegetation to reduce fuel loads, arrangements, and potential wildfire hazards.

Policy OSC-2.2 - Consider the limited public use of Town-owned public open space, where appropriate, in a manner that considers mitigation of impacts on adjacent neighbors and natural resources and does not conflict with existing reversion restrictions or increase the risk of fire hazards.

Policy OSC-3.1 - Continue to encourage the preservation of drainage watercourses and riparian habitat in a natural state by not allowing the culverting of existing creeks and requiring appropriate setbacks and buffers from creek beds. The Town has two regulations governing stream setbacks: (1) development is prohibited within 20 feet of the top of bank (TOB) of any stream, and (2) if any development is to occur between 20 and 50 feet from the TOB, a biologist must assess the project plans to ensure that no damage to the riparian area will occur.

Policy OSC-3.2 - Preserve and enhance valued riparian habitat and other important areas that provide important water quality benefits, such as watersheds.

Policy OSC-3.3 - Continue to preserve and protect valuable native tree life, such as redwoods, oaks and bays, while recognizing the need to allow for the gradual replacement of trees to provide for on-going natural renewal.

Policy OSC-3.4 - Enforce the Tree Removal Ordinance and require development proposals to provide adequate information to all Town staff to assess the project's impact on tree removal (Refer to Town of Hillsborough Ordinance No. 789).

Policy OSC-3.5 - Require property owners to replace removed native trees in a manner that maintains the visual character of the property and takes neighboring properties into consideration. The replacement trees may be located on other parts of the lot, as approved by the Town.

Policy OSC-3.6 - Continue to encourage property owners to find amicable solutions that address the need to balance the preservation of trees and private views.

Policy OSC-3.7 - Encourage the removal of non-native tree species, such as eucalyptus and acacia trees, that increase hazards for the community. Removed non-native trees should be replaced with native trees.

Policy OSC-3.8 - Continue to preserve the quality of trees in open space areas and in public landscaped areas.

Policy OSC-3.9 - Preserve dedicated open space areas and evaluate recreational potential of open space.

Policy OSC-3.10 - Continue to maintain fire trails in open space areas for public safety.

Policy OSC-3.11 - Preserve and protect rare and endangered species, and their habitats.

Policy OSC-3.12 - When appropriate, require proponents of projects to complete biological surveys necessary to ensure compliance with all local, regional, State and federal regulations. When negative impacts to biological resources are unavoidable, mitigation measures, such as conservation easements, will be required to reduce them.

Policy OSC-4.1 - Control and monitor development and activities along the creeks to avoid negative impacts from urban uses on water quality and habitat preservation and enhancement, as well as to protect the public health and safety of public and private property.

Policy OSC-4.2 - Encourage development to follow watershed-based planning and zoning by examining proposed development in the context of the entire watershed and sub-watershed.

Policy OSC-4.3 - Protect drainage facilities, including ensuring creekbank stability, to avoid negative impacts to downstream hydrology.

Policy OSC-4.4 - Require projects to reduce, to the extent feasible, potential sediment discharge, erosion, run-off flow and volume, and stormwater pollution, both during construction, as well as post-construction. Require projects to incorporate mitigation measures, such as Best Management Practices (BMPs), to address these water quality impacts, especially if proposing construction during the wet season.

Policy OSC-4.5 - Reduce the amount of hazardous wastes entering into the local and regional waterways by:

1. Prohibiting the illicit dumping of wastes into storm drains, creeks and other waterways.

2. Prohibiting the discharge of pollutants to the maximum extent practicable.

3. Encouraging the use of naturally pest-resistant landscaping and design features that reduce the need for chemical treatments, and incorporate stormwater detention and retention into their design, when appropriate.

Policy OSC-4.6 - Reduce surface run-off by minimizing impervious surfaces associated with motorized vehicles, as well as requiring projects to include site designs that minimize impervious surfaces and maximize on-site filtration.

Policy OSC-4.7 - Require property owners to work with the natural topography and drainages to the extent feasible when designing development projects to reduce the amount of grading necessary and limit the disturbances to natural water bodies and drainage systems.

Town of Hillsborough Tree Protection and Preservation (Ordinance No. 789)

The Tree Protection and Preservation Ordinance (Ordinance No. 789) of the Town of Hillsborough was adopted on March 13, 2023, and took effect on July 1, 2023. A "protected tree" is:

1. any tree species that is 18 inches or more in diameter at 4 foot six inches above natural grade.

2. Any tree planted as a requirement for site development, tree permit condition, landscape plan removal replacement, or other designated condition by the Town.

3. Does not include any tree grown or held for sale by a licensed nursery.

Tree protection and removal is addressed in Chapter 14.04 of the Town Municipal Code. The purpose of Chapter 14.04 is stated as follows:

> This chapter is adopted because the town has been forested by stands of oak, bay, redwood, pine and other trees, the preservation of which is necessary for the health and welfare of the citizens of this town in order to preserve the scenic beauty, prevent erosion of soil, protect against flood hazards and the risk of landslides, counteract the pollutants in the air, maintain the climatic balance and decrease wind velocities, and relieve the public of cost of installing and maintaining stormwater drainage systems.
>
> It is the intent of this chapter to establish regulations for the removal of trees in order to retain as many trees as possible consistent with the purpose hereof and the reasonable economic enjoyment of private property.

The Town of Hillsborough Municipal Code states that all tree removals related to the construction of property improvements, along with property improvement plans, require design review and approval from the Planning Department.

For projects that classify as subdivisions, all subdivision maps or divisions of land filed for tentative approval shall include an arborist report that clearly designates all "trees" (woody plants which have a trunk diameter of 6 inches or more measured at 4.6 feet above natural grade, i.e., 'breast height') or "groves" (group of at least five woody plants of the same type with a diameter of 6 inches or greater measured at breast height) proposed to be removed, and those to be retained. As noted in 14.04.030 Procedure – in Subdivisions, "those protected trees and/or groves proposed to be removed and those protected trees and/or groves proposed to be retained shall be shown by canopy size and species on the map. Any proposed additions or

replacements of protected trees and/or groves shall also be indicated by canopy size at maturity and species on the map and will require a tree removal permit."

An application, arborist report, and site plan are required for projects that propose removal of trees or groves. The Municipal Code has an involved process for approval of tree removals and replacements. A Town-qualified arborist first reviews the arborist report to determine its accuracy, then provides findings to the city engineer. When the tentative subdivision map or application for division of land comes before the Council or appropriate city officer, the city engineer renders an opinion as to whether the tree removal and replacement plan should be accepted, rejected, or modified. The opinion must consider the Town-qualified arborists opinion as well as recommendations adopted by resolution of the Town council about desirable/undesirable trees for various purposes and locations within the town (14.04.030 (E)). Then, the Town Council or appropriate city officer, at the time of making its tentative approval, must consider the engineer's report and any other pertinent information and accept, reject, or modify the tree removal and replacement plan. The developer is required to agree in writing to comply with any conditions imposed by the Town regarding maintenance of existing protected trees and replacement of removed protected trees.

The Town Council must consider the following regarding the trees (14.04.03(J)):

1. The type of trees, their desirability in the neighborhood, and the condition of the trees with respect to disease, danger of falling, proximity to existing or proposed structures, and interferences with utility services;

2. Necessity to remove trees in order to construct proposed improvements to allow reasonable economic enjoyment of the property upon which trees are located. The following should be considered in this context:

    a. Mitigation measures proposed to minimize the adverse impact;

    b. Alternative plans for development which will lessen the adverse impact on the removal;

    c. Assessment of the relationship between local short-term benefit and detriment to the long-term benefit and detriment (e.g., replacing open space with housing);

3. Topography of land and the effect of tree removal on erosion, soil retention, and the diversion or increased flow of surface waters;

4. Number of trees existing in the neighborhood on improved property and the effect of the tree removal on the neighborhood;

5. Good urban forestry practices, including, but not necessarily limited to, implementing tree protection and mitigation measures to ensure no net loss of canopy cover will occur.

In considering proposals to develop improved land other than subdivisions, the Building and Planning Department is required to consider the following in determining approval or denial (14.04.040 (F)):

1. Type of tree;
2. Desirability in the neighborhood;
3. Condition of the tree with respect to disease, danger of falling, or interference with utility services;
4. Effect on erosion, soil retention, and the diversion or increased flow of surface water;
5. Good forestry practices;
6. Number of existing trees to remain;
7. Alternatives available.

Once approved, a permit must be obtained from the building department. Final approval of a map constitutes a permit to remove any trees and/or groves designated on the tentative map as approved.

The developer is also required to submit a tree protection plan and establish a tree protection zone prior to the commencement of site development for any protected trees and/or groves. The tree protection zone shall extend 5 feet from a tree's dripline, or 15 feet from the truck (whichever is greater) and shall be clearly delineated with fencing and signage. The tree protection plan shall also clearly define the steps to protect the root systems of protected trees and/or groves during all periods of construction.

Chapter 16 of the Tree Ordinance refers to urban lot splits. No protected tree may be removed on a lot with any development under this chapter unless removal is necessary to construct a dwelling unit that must be allowed under state law. All protected tree removal will be completed in accordance with Chapter 14.04.

Chapter 14.04.055 of the Municipal Code addresses tree replacement in the following way:

A. Protected trees approved for removal shall be replaced, unless the finding is made at the time of granting an application that the site is inadequate to support the required number of replacement trees, as follows:

    1. Protected trees that prevent reasonable development shall be replaced within one year of removal by a minimum of one tree recommended or approved by the Town-qualified arborist. Minimum replacement tree size shall be twenty- four- inch box. In the event that the replacement tree dies, continuing responsibility on the part of the property owner to replace the tree with one of comparable size, within six months of the replacement tree's demise, shall exist;
    2. Continuing maintenance of required replacement trees by the property owner(s) or their successors shall be required. The property owner shall be required to notify any subsequent property owner of the continuing obligation to maintain the replacement trees.

B. In cases where a site cannot support all of the trees required for replacement purposes, the applicant may instead pay in-lieu fees to the Town's tree replacement fund according to a fee schedule established by resolution of the Building & Planning Department.

Town of Hillsborough Zoning Ordinance

The Town of Hillsborough is unique compared to other cities in California in that it consists mainly of low density single-family residential development, with a minimum lot size of ½ acre, with no commercial or industrial uses. The zoning ordinance is adopted to implement the goals, objectives, policies, and programs of the General Plan and to manage future growth and development in accordance with that plan. Priorities of the zoning ordinance include conservation of natural resources, natural beauty, and significant environmental amenities of the town (Draft Housing Element 2023).

Town of Hillsborough Wildland-Urban Interface Code (Ordinance No. 755)

The town adopted and incorporated, the International Wildland-Urban Interface Code, 2018 Edition, known as the Wildland-Urban Interface Code ("WUI"), as published by the International Code Council, not including Chapter 5 and including Appendices A, B, and F (but not including Appendices C, D, E, G and H which are not adopted), for regulating and governing the mitigation of hazard to life and property from the intrusion of fire from wildland exposures and fire from adjacent structures, for preventing structure fires from spreading to wildland fuels, and for the issuance of permits and collection of fees.

Properties shall perform fuel modification of combustible vegetation for defensible space. All parcels less than five acres in size shall provide fuel modification to the entire parcel in accordance with 603.2.1 through 603.2.3. The required defensible space distance for hazards defined by WUI areas are: 30 feet for a moderate hazard, 50 feet for a high hazard, and 100 feet for an extreme hazard (WUI 2018). Distances are allowed to be increased due to site-specific analysis based on local conditions and the fire protection plan (WUI 2018). All parcels five acres or larger in size shall provide fuel modification:

1. Around all structures for a distance of one-hundred feet or to the lot line, whichever is less.

2. Around the perimeter of all parcel lines for a distance of one-hundred feet in accordance with 603.2.1 through 603.2.3.

All properties shall conduct property maintenance in accordance with Section 604 annually of each calendar year and whenever it is deemed necessary due to fire conditions as determined by the Chief. Section A102 of the WUI refers to clearance of brush or vegetative growth from roadways. The code official is authorized to require areas within 10 feet on each side of portions of fire apparatus access roads and driveways to be cleared of non-fire-resistive vegetation growth. Exception: Single specimens of trees, ornamental vegetative fuels, or cultivated ground cover, such as green grass, ivy, succulents or similar plants used as ground cover, provided they do not form a means of readily transmitting fire. The gradient for fire apparatus access roads and driveways shall not exceed the maximum approved by the code official (WUI 2018).

County of San Mateo Defensible Space

Property owners living in State Responsibility Areas (SRA) are required by Public Resource Code (PRC) 4291 to maintain clearance of flammable vegetation around their property. A property owner's clearance responsibility is limited to 100 feet from his or her structure(s) or to the property line, whichever is closer, and is limited to their lands. However, coordination with adjacent landowners to achieve maximum defensible space is encouraged. Similar constraints have been developed for areas outside the SRA, within and adjacent to the WUI (CALFIRE 2018). Much of the southern portion of Hillsborough is in a very high fire hazard severity zone according to CAL FIRE, and portions of the Town to the east are in SRA's.

4.3.4 Thresholds of Significance

Potential impacts to biological resources were determined in accordance with Appendix G of the CEQA Guidelines. Impacts would be considered potentially significant if the proposed Project will:

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 the California Department of Fish and Game or U.S. Fish and Wildlife Service.

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 the California Department of Fish and Game or U.S. Fish and Wildlife Service.

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 (HCP), Natural Community Conservation Plan (NCCP), or other approved local, regional, or state habitat conservation plan.

4.3.5 Impacts and Mitigation Measures

The proposed Project consists of updates to the existing 2014 - 2022 Housing Element to reflect the 6th cycle 2023 – 2031 housing assignments. In addition, associated amendments to the Land Use Element and General Plan Land Use Map, Open Space and Conservation Element, and Public Safety Element; amendments to Title 17 (Zoning) of the Hillsborough Municipal Code, and amendments to the Hillsborough Zoning Map are proposed for consistency of all

Town documents, codes, and regulations. These associated amendments are generally described in sections 3.3.9 through 3.3.12 in the Project Description and would not result in environmental impacts to biological resources, Therefore, they are not discussed further in this chapter. The impact analysis focuses on the residential development that would be facilitated by the Draft 2023 – 2031 Housing Element.

A total of 36 housing opportunity sites have been identified for development in the Draft 2023 - 2031 Housing Element (Houseal Lavigne 2023, pg. 111). Three sites are larger and if subdivided as described in the Draft 2023 – 2031 Housing Element, could result in 43 new parcels and housing units, as summarized in the Draft Housing Element Table 8.9 (Housing Element Approach 4). Hillsborough is proposing two multi-family opportunity sites in Town (Housing Element Approach 5). In addition, the Housing Element Update Policy 2 will Promote the construction of ADUs on any residential lot (Housing Element Approach 1). Most ADUs would be built within an existing property footprint that is already impacted by housing development, would be small, and would not have a significant impact on biological resources (except possibly cumulative), as long as they are constructed according to existing ordinances and state and federal code protecting biological resources.

Implementation of the Draft 2023 – 2031 Housing Element would result in tree and vegetation removal from grading on steep hillsides and near streams and drainages to construct new homes and the public infrastructure (roads, utilities, etc.) needed to support the new development. Particularly the construction of water, wastewater, and stormwater runoff pipelines to the Tobin Clark site could impact sensitive biological resources (see Chapter 4.15 Utilities and Service Systems). The potential pipeline alignments could travel through sensitive habitats and cross drainages with riparian and wetland habitats. This construction could impact the sensitive species discussed above. Vegetation removal, including grubbing and trimming for the proposed housing sites, has the potential to directly impact nesting bird and bat roosting habitat, and sensitive land cover. Ephemeral streams which are a sensitive aquatic land cover type could also be impacted from the housing opportunity sites construction, either through direct impacts or indirect impacts of vegetation removal and erosion/sedimentation and the subsequent reduction in water quality. Additionally, construction activities have the potential to result in indirect impacts to birds and bats through lighting and acoustic nuisance. Special-Status Species listed in Table 4.3-2 could be directly or indirectly impacted during construction of the proposed housing sites.

Future housing development projects would be subject to a project specific CEQA analysis that tiers off this Program EIR. These projects would be reviewed by the Town for consistency with General Plan policies and programs focused on the protection of biological resources, as well as Town of Hillsborough Tree Protection and Preservation (Ordinance No. 789), and other the Municipal Code requirements intended to protect natural resources. Relevant, previously adopted policies and programs that would protect and avoid impacts on special-status species and their habitats include Policy OSC-3.1, Policy OSC-3.2, Policy OSC-3.3, Policy OSC-3.4, Policy OSC-3.5, Policy OSC-3.7, Policy OSC-3.11, Policy OSC-3.12, Policy OSC-4.1 Policy OSC-4.3, Policy OSC-4.4, and Policy OSC-4.7 (see Regulatory Setting section above). Policy OSC 3.11 is specifically related to the protection of special-status species and their habitats. Development of new housing sites proposed in the Hillsborough updated Housing Element could impact special-status species, nesting birds, and/or roosting bats, as described below.

Impact BIO-1 – Impacts to Special-Status Species. *[Threshold of Significance (a)]*

Development facilitated by the Project could occur on undeveloped or partially developed sites in proximity to areas where there are known occurrences of special-status species and/or habitats that may support these species. This could have a substantial adverse effect, either directly or through habitat modifications, on candidate, sensitive, or special-status species and is therefore considered a potentially significant impact.

Special-Status Species - Less Than Significant with Mitigation Incorporated. Many of the Draft 2023 – 2031 Housing Element housing opportunity sites are undeveloped and could contain habitat or be adjacent to habitat for special-status species. The proposed housing opportunity site locations are shown on Figure 4.3-1, which shows the land cover and vegetation communities, and Figure 4.3-2, which shows the wetlands and waterbodies. A project specific biological site evaluation would be necessary at the time a development application is submitted to the Town to determine if special-status species are present.

There are housing opportunity sites on or adjacent to natural habitat, such as riparian corridors, buckeye groves, and oak woodlands. Development of housing sites (e.g., Tobin Clark, Burlingame Country Club, Nueva School, 2260 Redington Rd., 275 Robin Rd., and 50 Brooke Ct.) on or adjacent to natural vegetation or aquatic habitat (i.e., streams, wetlands, etc.) may result in significant impacts to special-status species with the potential to occur in Hillsborough (see Figure 4.3-2: National Wetland Inventory Map and Figure 4.3-3 in Section 4.3.2 Existing Setting above), such as mortality or injury during construction and/or loss of habitat due to housing development. Indirect impacts due to noise, lighting, and disturbance from construction activities and later housing occupancy could also occur, resulting in stress or mortality to special-status species, local extirpation (plants), or causing them to move (animals). Mitigation Measure BIO-1 requiring the preparation of a project specific biological resource survey is recommended. Future residential project applications would be reviewed according to the Town's policies and Mitigation Measure BIO-1. Any future project with the potential to impact special-status species would require additional CEQA review, project level mitigation, and potentially permitting from the resource agencies. BIO-1 supports the 2005 GP Policy OSC-3.12 that requires proponents of projects to complete biological surveys necessary to ensure compliance with all local, regional, State, and federal regulations regarding biological resources. Implementation of Mitigation Measure BIO-1, in combination with implementing the biology mitigation measures from the project-specific biological resources assessment and compliance with regulatory requirements would prevent significant impacts to special-status species from new housing on sites containing or adjacent to natural habitat. This impact would be ***less than significant with mitigation incorporated.***

Nesting Birds - Less Than Significant with Mitigation Incorporated. Developed areas in Hillsborough may contain buildings, paved areas, landscaping, trees, other vegetation, and structures that provide habitat for nesting birds, in addition to nesting habitat available on undeveloped lots. All native birds and their nests are protected by the federal Migratory Bird Treaty Act and California Fish and Game Code. No significant long-term impacts to nesting birds are expected from the Project. Loss of nesting habitat due to construction-related removal of trees and other vegetation could occur but would be largely offset by the Hillsborough Tree Ordinance (Ordinance No. 789) and the Town's landscaping requirements for the new housing.

However, short-term impacts to nesting birds could occur during construction of new housing. If construction of new housing occurs during the bird nesting season, it could directly impact nesting birds through the accidental removal of nests during tree removal, demolition, and site preparation activities. In addition, indirect impacts from construction noise and activity could result in nest failure or abandonment. Mitigation Measure BIO-2 would prevent significant impacts to nesting birds during construction of new housing. This impact would be ***less than significant with mitigation incorporated***.

Roosting Bats - Less Than Significant with Mitigation Incorporated. Trees and vacant buildings can provide roosting habitat for bats, particularly near creeks or other freshwater habitat and away from significant human activity. Bats are protected by the California Fish and Game Code as nongame mammals. No significant long-term impacts to roosting bats are expected from the proposed updated Housing Element. The Hillsborough Tree Ordinance (Ordinance No. 789) and other policies would help to protect bat roosting habitat in Hillsborough. Mitigation Measure BIO-3a and 3b would prevent significant impacts to roosting bat habitat in areas with natural vegetation or aquatic habitat.

Short-term impacts to roosting bats could occur during construction of new housing. Removal of trees or structures for new housing could directly impact roosting bats by accidentally killing them or forcibly evicting them in daylight hours, resulting in severe stress or mortality. Indirect impacts could also occur if construction noise and activity occur adjacent to roosting bats. Special-status bats and maternity roosts are particularly sensitive to disturbance. Mitigation Measure BIO-3 would prevent significant impacts to roosting bats during construction of new housing. This impact would be ***less than significant with mitigation incorporated***.

Mitigation Measures

Impact BIO-1. Residential housing construction facilitated by the proposed Project could adversely impact special-status species.

Mitigation Measure BIO-1. Project-Specific Biological Resources Evaluation: Prior to the construction of new housing on sites that are on or adjacent to undeveloped land containing natural habitat (e.g., oak woodland, mixed woodland, and/or grassland) or aquatic habitat (i.e., from dripline of vegetation at top of creek bank), a project-specific biological resources evaluation shall be conducted by a qualified biologist. The biologist shall utilize relevant resources such as the California Natural Diversity Database (CNDDB) and the National Wetland Inventory (NWI) as well as a field survey covering the project site and adjacent areas. A biological resources report or memo shall be prepared documenting the results of the evaluation. At a minimum, the report or memo shall include a description of existing vegetation, habitats, and aquatic features on the project site; an evaluation of special-status species and sensitive habitats that could occur on the site; and suitable mitigation measures as needed to avoid project-related significant impacts to biological resources. Mitigation measures for impacts on special status species may include:

- Best Management Practices (BMP's) such as erosion control devises (e.g., straw wattles, silt fence),
- installation of temporary wildlife exclusion fencing along the limits of disturbance,

- worker environmental awareness training on special status species and sensitive habitat including avoidance and minimization measures for the project,
- preconstruction surveys and biological monitoring if sensitive species or an active nest / burrow is found,
- minimizing the development footprint (e.g., clustered development) or avoiding sensitive biological resources, and
- compensatory mitigation for impacts to special status species or their habitat such as habitat restoration, contributing to an established mitigation bank, incorporating a conservation easement on the property, or preserving suitable habitat in perpetuity off site.

Mitigation measures from the biological resources' evaluation shall be incorporated into the CEQA document for the project and/or adopted as project conditions of approval.

Applies To: New housing development on sites that are on or adjacent to natural vegetation or aquatic habitat (i.e., from the dripline of vegetation at the top of creek bank).

Mitigation Measure BIO-2. Nesting Birds: To avoid impacts to nesting birds and avoid potential violation of state and federal laws pertaining to birds, all construction of new housing (including but not limited to mobilization and staging, clearing, grubbing, tree removal, fence installation, demolition, grading, and creation of fuel breaks) must occur outside the avian nesting season (that is, prior to February 1 or after September 15) If site disturbance (i.e., mobilization, ground and vegetation disturbance) occurs within the avian nesting season (from February 1 to September 15), all suitable habitats located within the project's area of disturbance including staging and storage areas plus a 250-foot (passerines) and 1,000-foot (raptor nests) buffer around these areas shall be thoroughly surveyed, for the presence of active nests by a qualified biologist no more than five days before commencement of any site disturbance activities and equipment mobilization. If project activities are delayed by more than five days, an additional nesting bird survey shall be performed. Active nesting is present if a bird is building a nest, sitting in a nest, a nest has eggs or chicks in it, or adults are observed carrying food to the nest. The results of the surveys shall be documented.

If pre-construction nesting bird surveys result in the location of active nests, no site disturbance and mobilization of heavy equipment (including but not limited to equipment staging, fence installation, clearing, grubbing, vegetation removal, fence installation, demolition, and grading), shall take place within 250 feet of non-raptor nests and 1,000 feet of raptor nests, or as determined by a qualified biologist in consultation with the California Department of Fish and Wildlife, until the chicks have fledged. Monitoring shall be required to ensure compliance with the Migratory Bird Treaty Act and relevant California Fish and Game Code requirements. Monitoring dates and findings shall be documented.

Applies To: All housing construction (including ADUs) during the nesting bird season (February 1 through September 15).

Mitigation Measure BIO-3a. Bat Habitat Assessment: Prior to removal of trees or structures for housing development, a qualified biologist shall conduct a bat habitat assessment of trees and structures to be removed, as well as within 50 feet of surrounding trees and structures, if accessible. The biologist shall search for large cavities and crevices in trees and structures that

could support maternity roosts as well as habitat for special-status bat species. Signs of bats such as guano or the smell of bats shall also be noted. Results of the bat habitat assessment shall be documented.

If no suitable roosting habitat or signs of bats are found, then no further action is required, and the project may proceed as planned. If suitable roosting habitat or signs of bats are found, then Mitigation Measure 3b shall be implemented.

Mitigation Measure BIO-3b. Dusk Emergence Bat Survey: If suitable roosting habitat or signs of bats are found in trees or structures to be removed on a new housing site a qualified biologist shall conduct a dusk emergence survey for roosting bats within 14 days prior to the removal of the tree(s) or structure(s). The biologist shall monitor all suitable roosting trees and structures at dusk for emerging bats, using acoustic equipment to identify the species. Results of the survey shall be documented. If no roosting bats are found during the survey, then no further action is required, and the project may proceed as planned.

If roosting bats are found during the survey, a disturbance-free buffer zone shall be established around the roost site during the maternity season (April 15-September 15), as determined by a qualified biologist until the maternity season is over. Outside the maternity season, roosting bats may be excluded from the tree(s) or structure(s) prior to their removal as directed by a qualified biologist. During this period, exclusion shall only occur between September 15 and October 15, during warm (i.e., evening temperatures > 50° F) and dry weather when bats are active. The exact materials and methods for exclusion will depend on the type of roost (e.g., crevice, open building) but may include use of one-way doors or two-step tree removal process (removal of tree parts containing non-roost features on day 1 and full removal of the tree on day 2). If one-way doors are used, they shall be left in place for a minimum of 7 days or as long as necessary to allow all bats to exit the roost before sealing or removal of the tree/structure. The exact materials and methods of exclusion shall be determined by a qualified biologist who has knowledge of bat biology and behavior, and prior experience with bat habitat assessments, mitigation, and exclusion. If a maternity colony of a special-status bat species or non-special-status bat species is found during the maternity season, the roosting site shall be preserved, and a disturbance-free buffer shall be maintained around the roost. Disturbance-free buffers for bat maternity colonies of special-status and non-special-status bats may range from 50 feet to 300 feet. The disturbance-free buffer distance will be dependent on the type of disturbance and the species of bat present. Disturbance-free buffers shall be periodically monitored by a qualified biologist to ensure that such buffers are adequately protecting maternity colonies. Following the maternity season, any bats remaining in the roost may be excluded following the procedures described above. Once all bats have been excluded from the roost site, the roost may be removed.

Applies To: Any housing project that requires removal of trees or structures that may affect special status species.

Conclusion of Impact BIO-1. Implementation of Mitigation Measures BIO-1 through BIO-3 would reduce potential impacts to any species listed as candidate, sensitive or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Game or U. S. Fish and Wildlife to ***less than significant with mitigation incorporated***.

Impact BIO-2 – Impacts on Riparian Habitat and other Sensitive Natural Communities. *[Thresholds of Significance (b)]*

Residential development facilitated by the Draft 2023 – 2031 Housing Element could have a substantial adverse effect on riparian habitat or other sensitive natural communities identified in local or regional plans, policies, regulations, or by the CDFW or.

Generally, a riparian area is vegetation adjacent to surface water such as ponds/lakes, streams, or creeks. As shown in Figure 4.3-1 and Figure 4.3-2, the Town contains riparian habitat and natural communities that may be classified by CDFW as sensitive. Many of the candidate housing sites are in proximity to these resources. The Draft 2023 – 2031 Housing Element would not directly develop any of the candidate housing sites; however, it would promote and facilitate the development of these sites. Such development could potentially impact sensitive resources on sites that contain natural conditions or are in proximity to undeveloped sites containing natural conditions. Hillsborough's creeks may support riparian habitat and more information can be found on each housing opportunity site in the previous section on "Biological Resources in the Housing Element Opportunity Sites". Creeks are also protected by the federal Clean Water Act, the California Porter-Cologne Act, and California Fish and Game Code.

Because site-specific impacts related to biological resources at the Housing Opportunity Sites are unknown at this time, and because habitat conditions or the list of special-status species can change over time, development of housing projects subject to discretionary review by the Town, if or when applied for, would require site-specific assessments (i.e., BIO-1) to determine what biological resources are or may be present.

Housing construction activities, including roads and utility infrastructure construction facilitated by the Draft 2023 - 2031 Housing Element, would likely result in the loss of oak woodland and other native habitat types. Construction activities (e.g., grading and vegetation removal) could result in disturbance and loss of riparian woodland and scrub habitat that occurs along drainage channels, which are considered a sensitive natural community. Particularly the construction of water, wastewater, and stormwater runoff pipelines to the Tobin Clark site could impact riparian vegetation, oak woodland and other native habitat types (see Chapter 4.15 Utilities and Service Systems). The potential pipeline alignments could travel through sensitive habitats and cross drainages with riparian and wetland habitats.

Based on the vegetation mapping provided by GGNPC, which is the total acres of vegetation types within Hillsborough (Table 4.3-1), implementation of the housing element could result in impacts up to 975.2 acres of oak woodland, 38.68 acres of grassland, 83.49 acres of native scrub habitat, 4.14 acres of arroyo willow thickets (i.e., riparian), and 1.71 acres of wetlands (i.e., streams, lake/pond). Five sensitive terrestrial land cover types may be impacted which are California buckeye groves (0.09-acre upland and 1.01-acre riparian mapped on Tobin Clark site), Monterey pine woodland and forest (105.5 acres), valley oak woodland (3.22 acres), serpentine bunchgrass (18.24 acres within planning area), and valley needle grass grassland (38.68 acres of annual & perennial grassland). Likely not all the annual and perennial grassland would be designated as sensitive needle grass grassland. A biological assessment prior to housing development would confirm the impacts to sensitive natural communities. Not all riparian areas and sensitive natural communities are shown on Figure 4.3-1 or Figure 4.3-2 since site-specific biological surveys have not been conducted. Site assessments and more

detailed vegetation mapping would determine whether sensitive resources are present on the individual housing opportunity sites. Should riparian areas or sensitive natural communities be present, development that impacts these resources would have significant impacts. Per Policy OSC 3.1 of the Town of Hillsborough, development is prohibited within 20 feet of the top of bank (TOB) of any stream, and if any development is to occur between 20 and 50 feet from the TOB, a biologist must assess the project plans to ensure that no damage to the riparian area will occur. The Hillsborough General Plan policies OSC 3.1, OSC 4.1, OSC 4.2, OSC 4.3, OSC 4.4, OSC 4.5, OSC 4.6, and OSC 4.7 all apply to creeks, drainages, and riparian habitat.

General Plan Policy OSC 3.1 prohibits development within 20 feet of the top of bank which protects riparian and wetland resources to some extent, but it does not create the level of protection an Ordinance could. Many future housing development projects facilitated by the updated Housing Element would be ministerial (i.e., ADU sites) and would not go through CEQA review and would not be subject to the mitigation measures adopted by the Town upon certification of this EIR. In other words, mitigation measures presented in this EIR would not apply to ministerial projects. To strengthen the Town's protection of riparian and stream resources, Mitigation Measure BIO-4 (below) requires the Town to adopt an Ordinance to protect riparian and stream resources more explicitly. A Steam Protection Ordinance would reduce impacts to less than significant, which could otherwise be significant and unavoidable.

A Stream Protection Ordinance would apply to both discretionary and ministerial housing projects and would ensure protection of riparian resources from all housing development facilitated by the Draft 2023 - 2031 Housing Element. This measure will further minimize impacts to riparian vegetation and steams by providing a greater buffer distance to reduce runoff, erosion, and sediment from entering the creek. The current General Plan policy OSC 3.1 setback of 20 feet does not adequately take into consideration steep slopes, the extent of riparian vegetation, or special status species that may be present in the creek. In limited circumstances, the setback may be reduced or increased if recommended by a qualified biologist and approved by the Town.

Mitigation Measure BIO-1 requires a project specific biological resources evaluation for sites that are on or adjacent to natural vegetation (i.e., native) or aquatic habitat, which would include riparian habitat and other sensitive habitats. The biological resources evaluation would include site-specific mitigation to protect riparian and other sensitive habitat as needed. The proposed Draft 2023 - 2031 Housing Element would not significantly impact riparian or other sensitive habitat with compliance with General Plan policies referenced above, and implementation of Mitigation Measure BIO-1 and BIO-4. Implementation of Mitigation Measure BIO-1 (above) and Mitigation Measure BIO-4 (below) would reduce potential impacts to ***less than significant with mitigation incorporated.***

Impact BIO-3 – Impacts on Wetlands. *[Threshold of Significance (c)]*

Residential development facilitated by the Project could occur on undeveloped or partially developed sites in proximity to wetlands. This could have a substantial adverse effect on wetlands by directly removing them or changing the water regime that supports them and is therefore considered a potentially significant impact.

Wetlands are areas with soils that are permanently or seasonally saturated by water. Wetlands may include ponds and creeks within the planning area. As shown in Figure 4.3-2, the Town contains wetland habitat (i.e., freshwater pond and riverine). Many of the candidate housing sites are in proximity to these resources. The Draft 2023 – 2031 Housing Element would not directly develop any of the candidate housing sites; however, it would promote and facilitate the development of these sites. Such development could potentially impact wetlands. Particularly the construction of water, wastewater, and stormwater runoff pipelines to the Tobin Clark site could impact riparian vegetation, (see Chapter 4.15 Utilities and Service Systems). The potential pipeline alignments could travel through sensitive habitats and cross drainages with riparian and wetland habitats. Because site-specific impacts related to biological resources at the Housing Opportunity Sites are unknown at this time, development of housing projects subject to discretionary review by the Town, if or when applied for, would require site-specific assessments (i.e., BIO-1) to determine what resources are or may be present.

Not all wetlands are shown on Figure 4.3-2 since site-specific biological surveys or wetland delineations have not been conducted. Site assessments, wetland delineations, and more detailed vegetation mapping would determine whether sensitive resources (i.e., wetlands) are present on the individual housing opportunity sites. Should wetlands be present, development that impacts these resources would have significant impacts.

Federally and state protected wetlands in Hillsborough are generally limited to creeks, streams, and ponds. Several creeks and streams (tributaries) are located within the boundaries of the Project Planning Area (Figure 4.3-2). The National Wetlands Inventory map (Figure 4.3-2) shows wetlands, ponds, and riverine (i.e., creeks and tributaries) in relation to the housing sites. According to the National Wetlands Inventory, there is a freshwater pond mapped within the Burlingame Country Club off New Place Road where a housing site is located and off Macadamia Drive within 650 feet of a proposed housing site (NWI 2023). The Town of Hillsborough housing sites that could have impacts to creek/riverine or water features from north to south are as follows.

- 2260 Redington Road (APN 028040120) is adjacent to Sanchez Creek and contains a tributary in the middle of the proposed housing site.
- Burlingame Country Club has a pond, and Terrace Creek crosses the middle of the proposed housing site.
- Nueva School (APN 28320180) is a 33.6-acre parcel containing two tributaries to Sanchez Creek on the NW and SE sides of the site.
- 7 small vacant housing opportunity sites contain or are adjacent to Ralston Creek and/or its tributaries.
- Hayne Road (APN 030191030) is a long narrow 11.6-acre lot split opportunity site containing Burlingame Creek, and adjacent to Cherry Canyon Creek.
- 7 smaller to medium vacant housing opportunity sites are associated with (within or adjacent) San Mateo Creek and tributaries.
- Tobin Clark (APN 038281300 and APN 038281310) is a 20.9-acre site within or adjacent to the tributaries of San Mateo Creek.
- 50 Brooke Court (APN 038281280) is a 10.9-acre lot split opportunity site on the south end of town containing or adjacent to Borel and San Mateo creeks and their tributaries.

Hillsborough's creeks may support wetlands, and more information can be found on each housing opportunity site in the previous section on "Biological Resources in the Housing Element Opportunity Sites". Wetland and aquatic resources are also protected by the federal Clean Water Act, the California Porter-Cologne Act, and California Fish and Game Code. The current General Plan policy OSC 3.1 setback of 20 feet does not adequately take into consideration steep slopes, the extent of riparian vegetation, or special status species that may be present in the creek.

Implementation of Mitigation Measure BIO-1 (above) and Mitigation Measure BIO-4 (below) would reduce potential impacts to ***less than significant***.

Impact BIO-2 and BIO-3: Residential development facilitated by the proposed Project could adversely impact riparian habitat and wetlands.

Mitigation Measure BIO-4 – Stream Protection Ordinance.

The Town of Hillsborough shall codify General Plan Policy OSC 3.1 that protects streams to assure protection is provided uniformly to streams and creeks, regardless of the type of housing application. The Town shall adopt an Ordinance implementing the requirements of General Plan policy OSC 3.1, ensuring it applies to all residential development projects uniformly and shall include amendments to the zoning ordinance (Development Code) that would establish setbacks which range from 20 feet (General Plan policy OSC 3.1) to 100 feet or more upland from the top of stream banks depending on the size of the lot, slope, nature and quality of riparian and stream resources, and species present, the standards for development within the setbacks, and review procedures and permit requirements. Setback requirements in areas where special-status species associated with the stream and surrounding habitat should ensure the long-term protection of those species and their habitats. Construction of main or accessory structures, earthmoving activity, land clearing, or agricultural uses shall be set back 50 feet from delineated wetland boundaries. The setback shall be 100 feet or more in areas with slopes greater than 50% unless additional measures are installed to protect the stream from erosion. This measure will further minimize impacts to steams by providing a greater distance to reduce runoff, erosion, and sediment from entering the creek. In limited circumstances, the setback may be reduced or increased if recommended by a qualified biologist and approved by the Town.

Impact BIO-4 – Impacts on Wildlife Movement Corridors and Wildlife Nursery Sites. *[Threshold of Significance (d)]*

Development facilitated by the proposed Project could interfere with the movement of wildlife or result in the loss or reduction of undeveloped or underutilized land that provides movement corridors for wildlife species. In addition, development activities could impair or destroy breeding sites, including the taking of active bird nests and bat maternity roosts. This is considered a potentially significant impact.

Adoption of the Draft 2023 – 2031 Housing Element would not directly develop the proposed housing sites but would make feasible the development of these sites in the future. Impacts that may result from adoption of the Draft Housing Element include loss of or reduction of undeveloped or underutilized land that provides movement corridors for wildlife species, loss, or

reduction of breeding sites, and take of active bird nests and bat maternity roosts. Nursery sites are locations where wildlife concentrate for hatching and/or raising young, such as rookeries, spawning areas, and bat colonies. Individual housing projects (ministerial and discretionary projects) that would be facilitated by adoption of the Draft 2023 – 2031 Housing Element would be required to comply with all State and federal laws protecting nesting birds (see Regulatory Setting section). Discretionary projects must comply with CEQA, which would require an analysis of impacts on movement corridors and nursery sites.

None of the proposed housing opportunity sites are expected to support nursery sites, and the properties are dispersed enough that wildlife can move through or around them. Hillsborough General Plan policy OSC 3.1 prohibits most development within 20 feet of a stream, including housing, which would protect movement corridors for aquatic species. In addition, Mitigation Measure BIO-1 requires a project specific biological resources evaluation for sites that are on or adjacent to natural vegetation or aquatic habitat. The biological resources evaluation would address wildlife movement and nursery sites if applicable and include site-specific mitigation as needed. The proposed updated Housing Element would not significantly impact wildlife movement and nursery sites with compliance with the General Plan policies and implementation of Mitigation Measure BIO-1.

Conclusion of Impact BIO-4. Mitigation Measure BIO-1 and Mitigation Measure BIO-4 would work to protect nursery sites and wildlife movement corridors. Implementation of these mitigation measures would reduce impacts of the Project on wildlife corridors and nursery sites to ***less than significant with mitigation incorporated***.

Impact BIO-5 – Conflicts with Local Policies or Ordinances Protecting Biological Resources. *[Threshold of Significance (e)]*

Residential development facilitated by the Draft 2023 – 2031 Housing Element could conflict with adopted plans, policies and ordinances protecting biological resources if future residential projects impact sensitive biological resources. For example, adoption of the Draft 2023 - 2031 Housing Element would make feasible new housing development and activities that could result in impacts on up to 1,282.2 acres of native forest and woodland (based on mapping by GGNPC 2022, and not based on site-specific surveys), if all lots are fully developed. Direct impacts to forest, such as grading (cut and fill) and vegetation removal, and indirect impacts to aquatic land cover types, such as erosion or runoff, would be considered potentially significant under CEQA.

The Town Municipal Code encourages tree protection and specifies mitigation for tree loss by requiring minimum replacement size and ratio or payment of an in-lieu fee to the Town's tree replacement fund if replacement is not feasible. Many of the trees affected by residential development facilitated by the Draft 2023 - 2031 Housing Element likely qualify as protected under the Town tree protection and preservation ordinance. The tree protection ordinance requires consideration of canopy size and good urban forestry practices including measures to ensure no net loss of canopy cover. Compliance with the tree ordinance will protect biological resources by ensuring no net loss of canopy cover, and development will occur over time (not all at once), minimizing the cumulative effects of tree removal on biological resources, and will prevent significant impacts.

Similarly, the Project could facilitate housing development that could result in impacts on streams. Many of the proposed housing opportunity sites are developed and/or small vacant lots surrounded by development, however some housing sites may contain sensitive biological resources. For example, the Tobin Clark property contains oak woodland, buckeye groves, riparian habitat, and ephemeral streams. All housing projects would have to comply with the Town of Hillsborough Tree Ordinance (No. 789) and General Plan policy OSC 3.4, which requires a permit for removal of protected trees and has standards for protecting retained trees during construction and for the replacement of trees. Housing projects near streams would also have to comply with the Hillsborough General Plan policy of requiring appropriate setbacks and buffers from creek beds (OSC 3.1), which prohibits most development within 20 feet of a stream, including housing. Mitigation Measure BIO-4 recommends an ordinance regarding stream setbacks that would apply to all residential housing projects (discretionary and ministerial projects) on or adjacent to sites with aquatic resources and/or riparian vegetation.

Mitigation Measure BIO-1 requires a project specific biological resources evaluation for housing sites that are on or adjacent to natural vegetation or aquatic habitat. The biological resources evaluation would address sensitive biological resources and include site-specific mitigation as needed. Mitigation Measures BIO-2 and BIO-3 would prevent significant impacts to nesting birds and roosting bats, respectively, from new housing projects. BIO-4 would prevent significant impacts to wetlands and riparian vegetation. Compliance with the Hillsborough tree ordinance, General Plan policies, and implementation of Mitigation Measures BIO-1 through BIO-4, would allow the proposed Draft 2023 - 2031Housing Element to avoid conflict with local policies and ordinances protecting biological resources.

Conclusion of Impact BIO-5. Implementation of Mitigation Measures BIO-1 through BIO-4 would reduce potential impacts to ***less than significant with mitigation incorporated***.

Impact BIO-6 – Conflicts with Adopted Habitat Conservation Plans, Natural Community Conservation Plans, or Other Conservation Plans. *[Threshold of Significance (f)])*

No Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or State habitat conservation plans are present in Hillsborough. Therefore, there is no impact related to conflicts with adopted Habitat Conservation Plans, Natural Community Conservation Plans, or other conservation plans.

Mitigation Measures. None required.

4.3.6 References

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4.4 Cultural Resources and Tribal Cultural Resources

4.4.1 Environmental Setting

The following environmental setting information is summarized from the Environmental Impact Report for the Meadowood Estates Subdivision Project prepared by the Town of Hillsborough and MIG, Inc. and certified in 2019.

Prehistoric Settlement

The San Francisco Bay Area held abundant resources for Native American tribes, who tended to live along alluvial terraces and at the historic margins of the Bay (Town of Hillsborough 2018). The Peninsula region contained reliable and sufficient food sources for permanent village communities that would move between lowlands and foothills depending on the season. The Ohlones, also known by anthropologists as “Costanoan” (from the Spanish word Costaño, meaning “coast people”), lived in an area that extended generally from San Francisco down to Santa Cruz, bounded on the east by the Diablo Range. The Ssalson tribelet (“village community”), part of the larger Ohlone tribe, inhabited the area around San Mateo Creek. Other tribelets in the vicinity included the Lamchin and Puichun farther south, and the Ramay west, toward the coast.

The first recorded Spanish expedition to the area occurred in 1769. With the founding of Mission San Francisco de Asis (Mission Dolores) in 1776, Native Americans from around the Bay Area, including the Ssalson, were brought to the mission, at first voluntarily. In later years, resistance developed, and sometimes armed parties were used to bring natives into the mission as well as capture runaways.

Mission life as well as religious conversion introduced profound changes for local natives throughout the Peninsula and brought about their gradual but steady decline. Some changes were the product of the physical confinement of the mission, others were more basic like the change in diet. Disease was a common scourge. And the intermixing of tribal groups from around the Bay Area, with their different customs and languages, added to a loss of tribal identity. By 1793, the last Ssalson had joined the missions.

Historic Setting

The secularization of the missions began after Mexican independence from Spain in 1821 (Town of Hillsborough 2018). The Mexican government distributed former mission lands as grants, which led to formation of large ranches, known as ranchos. Rancho Buri Buri (14,639 acres) was granted to Jose Antonio Sanchez in 1835. The adjacent 6,439-acre Rancho San Mateo, south of Rancho Buri Buri, was granted to Cayetano Arenas in 1846 by the last Governor of Mexico, Pio Pico, but remained in the Arenas family less than a year before being sold to William Davis Merry Howard.

Howard immigrated to California from Hillsboro, New Hampshire in 1824. Already from a wealthy family, he became wealthier during the Gold Rush. While he owned Rancho San Mateo, Howard forced Native Americans off his rancho lands. Upon his death in 1856, Howard left the southern half of the rancho to his wife. This portion later became present day San Mateo. The

northern half of the rancho was left to Dr. Joseph Henry Poett, his wife's father, and would become Burlingame and Hillsborough. Poett later gave the western part of his land to his other daughter, Julia Redington. For decades the Howard, Poett, and Redington families controlled most of Rancho San Mateo.

By the late 1860s, the Howards broke up their rancho lands, and the lands became large estates. Wealthy San Franciscans built lavish homes in the area. The Burlingame Country Club was established in Hillsborough in 1893 and attracted many of San Francisco's wealthy elite, who soon built a train station in Burlingame, around which a commercial area grew.

After the 1906 San Francisco earthquake, there was more interest in buying estates on the Peninsula. Members of the Burlingame Country Club, concerned that their land might be annexed into Burlingame or San Mateo, instead decided to incorporate their own city. In 1910, Hillsborough was officially incorporated.

During the 1900s, the large estates continued to be split up. Yet despite the smaller parcel size and growing population, Hillsborough resisted commercial development, unlike most of its Peninsula neighbors, and maintained a residential atmosphere based on large lots.

Many of the homes constructed in the Town during the 1900s still stand today. Because many existing homes in the Town are over 50 years old, many homes in the Town may be potentially historic properties. The National Register of Historic Places, authorized by the National Historic Preservation Act of 1966, contains the official list of the country's historic places worthy of preservation. The Carolands Chateau located at 565 Remillard Drive is listed on the National Register of Historic Places and the California Register of Historical Resources and is the Town's only registered historic property. The Town has also made note of several properties as potentially historic, including La Dolphine at 1761 Manor Drive, Newhall Manor at 1615 Floribunda, and De Guigne Estate at 891 Crystal Springs Road, and the Tobin Clark Estate at 40 Verabalee Lane (Email correspondence with Liz Ruess 2023).

4.4.2 Regulatory Setting

Federal

National Historic Preservation Act of 1966

Enacted in 1966, the National Historic Preservation Act (NHPA) (16 U.S.C §§ 470 et seq.) declared a national policy of historic preservation and instituted a multifaceted program, administered by the Secretary of the Interior, to encourage the achievement of preservation goals at the federal, state, and local levels. The NHPA authorized the expansion and maintenance of the National Register of Historic Places (NRHP), established the position of State Historic Preservation Officer (SHPO), provided for the designation of State Review Boards, set up a mechanism to certify local governments to carry out the purposes of the NHPA, assist Native American tribes in preserving their cultural heritage, and created the Advisory Council on Historic Preservation (ACHP).

NHPA establishes the nation's policy for historic preservation and sets in place a program for the preservation of historic properties by requiring federal agencies to consider effects to significant cultural resources (i.e., historic properties) prior to undertakings.

Section 106 of the Federal Guidelines

Section 106 of the NHPA states that federal agencies with direct or indirect jurisdiction over federally funded, assisted, or licensed undertakings must take into account the effect of the undertaking on any historic property that is included in, or eligible for inclusion in, the NRHP and that the ACHP and SHPO must be afforded an opportunity to comment, through a process outlined in the ACHP regulations at 36 Code of Federal Regulations (CFR) Part 800, on such undertakings.

Secretary of the Interior's Standards

The Secretary of the Interior is responsible for establishing professional standards and providing guidance related to the preservation and protection of all cultural resources listed in, or eligible for listing in, the National Register of Historic Places. The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings and the Secretary of the Interior's Guidelines for Rehabilitating Historic Buildings and the Guidelines on Sustainability for Rehabilitating Historic Buildings apply to all grants-in-aid projects assisted through the Historic Preservation Fund, and are intended to be applied to a wide variety of historic preservation and community projects and resources focused on heritage preservation, including buildings, structures, sites, objects, and districts.

National Register of Historic Places

The NRHP was established by the NHPA of 1966 as "an authoritative guide to be used by federal, state, and local governments, private groups, and citizens to identify the Nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment." The NRHP recognizes properties that are significant at the national, state, and local levels. To be eligible for listing in the NRHP, a resource must be significant in American history, architecture, archaeology, engineering, or culture. Districts, sites, buildings, structures, and objects of potential significance must also possess integrity of location, design, setting, materials, workmanship, feeling, or association. A property is eligible for the NRHP if it is significant under one or more of the following criteria:

Criterion A:	It is associated with events that have made a significant contribution to the broad patterns of our history.
Criterion B:	It is associated with the lives of persons who are significant in our past.
Criterion C:	It embodies the distinctive characteristics of a type, period, or method of construction; represents the work of a master; possesses high artistic values; or represents a significant and distinguishable entity whose components may lack individual distinction.
Criterion D:	It has yielded, or may be likely to yield, information important in prehistory or history.

Cemeteries, birthplaces, or graves of historic figures; properties owned by religious institutions or used for religious purposes; structures that have been moved from their original locations;

reconstructed historic buildings; and properties that are primarily commemorative in nature are not considered eligible for the NRHP unless they satisfy certain conditions. In general, a resource must be at least 50 years of age to be considered for the NRHP, unless it satisfies a standard of exceptional importance.

Native American Graves Protection and Repatriation Act (NAGPRA) of 1990

The NAGPRA of 1990 sets provisions for the intentional removal and inadvertent discovery of human remains and other cultural items from federal and tribal lands. It clarifies the ownership of human remains and sets forth a process for repatriation of human remains and associated funerary objects and sacred religious objects to the Native American groups claiming to be lineal descendants or culturally affiliated with the remains or objects. It requires any federally funded institution housing Native American remains or artifacts to compile an inventory of all cultural items within the museum or with its agency and to provide a summary to any Native American tribe claiming affiliation.

State

California Environmental Quality Act (CEQA)

CEQA provides criteria to evaluate whether a building, structure, object, or site is significant. Under CEQA Guideline §15064.5(a), historic resources include the following:

A. A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code §5024.1, Title 14 CCR, Section 4850 et seq.)

B. A resource included in a local register of historical resources, as defined in §5020.1(K) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements of §5024.1 (g) of the Public Resources Code, 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.

C. 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, providing 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 California Register of Historic Resources (Pub. Res. Code §5024.1, Title 14 CCR, Section 4852) including the following:

    1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

    2. Is associated with the lives of persons important in our past;

3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or

4. Has yielded, or may be likely to yield, information important in prehistory or history.

D. The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to §5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in §5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be a historical resource as defined in Public Resources Code §5020.1(j) or 5024.1. In accordance with CEQA, properties designated or eligible at all levels are deserving of protection by a lead agency when any undertaking proposes to demolish or alter any such property.

Typically to be considered an historic resource under CEQA, the structure in question must at least be considered eligible for local listing. However, in some cases a structure may be considered ineligible such as after detailed historic or architectural assessment, and thus would no longer be considered an historic resource under CEQA.

California Register of Historical Resources

Created in 1992 and implemented in 1998, the California Register of Historical Resources (CRHR) is "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 properties that are to be protected, to the extent prudent and feasible, from substantial adverse change (CA Public Resources Code)." Certain properties, including those listed in or formally determined eligible for listing in the NRHP and California Historical Landmarks (CHLs) numbered 770 and higher, are automatically included in the CRHR. Other properties recognized under the California Points of Historical Interest program, identified as significant in historic resources surveys, or designated by local landmarks programs may be nominated for inclusion in the CRHR. A resource, either an individual property or a contributor to a historic district, may be listed in the CRHR if the State Historical Resources Commission determines that it meets one or more of the following criteria, which are modeled on NRHP criteria (Public Resources Code):

Criterion 1: It is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.

Criterion 2: It is associated with the lives of persons important in our past.

Criterion 3: It embodies the distinctive characteristics of a type, period, region, or method of construction; represents the work of an important creative individual; or possesses high artistic values.

Criterion 4: It has yielded, or may be likely to yield, information important in history or prehistory.

Resources nominated to the CRHR must retain enough of their historic character or appearance to be recognizable as historic resources and to convey the reasons for their significance. It is possible that a resource whose integrity does not satisfy NRHP criteria may still be eligible for listing in the CRHR. A resource that has lost its historic character or appearance may still have sufficient integrity for the CRHR if, under Criterion 4, it maintains the potential to yield significant scientific or historical information or specific data. Resources that have achieved significance within the past 50 years also may be eligible for inclusion in the CRHR, provided that enough time has lapsed to obtain a scholarly perspective on the events or individuals associated with the resource.

California Historical Landmarks (CHLs)

CHLs are buildings, structures, sites, or places that have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other value and that have been determined to have statewide historical significance by meeting at least one of the criteria listed below. The resource must also be approved for designation by the County Board of Supervisors or the City or Town Council in whose jurisdiction it is located, be recommended by the State Historical Resources Commission, or be officially designated by the Director of California State Parks. The specific standards in use now were first applied in the designation of CHL No. 770. CHLs No. 770 and above are automatically listed in the CRHR.

To be eligible for designation as a Landmark, a resource must meet at least one of the following criteria:

- The first, last, only, or most significant of its type in the state or within a large geographic region (Northern, Central, or Southern California); or
- Associated with an individual or group having a profound influence on the history of California. A prototype of, or an outstanding example of, a period, style, architectural movement or construction or one of the more notable works or the best surviving work in a region of a pioneer architect, designer, or master builder.

California Points of Historical Interest

California Points of Historical Interest are sites, buildings, features, or events that are of local (city or county) significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other value. Points of Historical Interest (Point or Points) designated after December 1997 and recommended by the State Historical Resources Commission are also listed in the CRHR. No historic resource may be designated as both a Landmark and a Point. If a Point is later granted status as a Landmark, the Point designation will be retired. In practice, the Point designation program is most often used in localities that do not have a locally enacted cultural heritage or preservation ordinance.

To be eligible for designation as a Point, a resource must meet at least one of the following criteria:

- The first, last, only, or most significant of its type within the local geographic region (city or county).

- Associated with an individual or group having a profound influence on the history of the local area.

- A prototype of, or an outstanding example of, a period, style, architectural movement or construction or one of the more notable works or the best surviving work in the local region of a pioneer architect, designer, or master builder.

California Native American Historical, Cultural, and Sacred Sites Act

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

Native American Heritage Commission, Public Resources Code Sections 5097.9–5097.991

Section 5097.91 of the Public Resources Code (PRC) established the Native American Heritage Commission (NAHC), whose duties include the inventory of places of religious or social significance to Native Americans and the identification of known graves and cemeteries of Native Americans on private lands. Under Section 5097.9 of the PRC, a state policy of noninterference with the free expression or exercise of Native American religion was articulated along with a prohibition of severe or irreparable damage to Native American sanctified cemeteries, places of worship, religious or ceremonial sites or sacred shrines located on public property. Section 5097.98 of the PRC specifies that in the event of human remains discovery, no further disturbance is allowed until the county coroner has made the necessary findings regarding the origin and disposition of the remains. If the remains are of a Native American, the county coroner must notify the NAHC. The NAHC then notifies those persons most likely to be related to the Native American remains. The code section also stipulates the procedures that the descendants may follow for treating or disposing of the remains and associated grave goods. Section 5097.5 defines as a misdemeanor the unauthorized disturbance or removal of archaeological, historic, or paleontological resources located on public lands.

California Native American Graves Protection and Repatriation Act of 2001

Codified in the California Health and Safety Code Sections 8010–8030, the California NAGPRA is consistent with the federal NAGPRA. Intended to “provide a seamless and consistent state policy to ensure that all California Indian human remains, and cultural items be treated with dignity and respect,” the California NAGPRA also encourages and provides a mechanism for the return of remains and cultural items to lineal descendants. Section 8025 established a Repatriation Oversight Commission to oversee this process. The act also provides a process for non–federally recognized tribes to file claims with agencies and museums for repatriation of human remains and cultural items.

Senate Bill (SB) 18

California Government Code, Section 65352.3 incorporates the protection of California traditional tribal cultural places into land use planning for cities, counties, and agencies by establishing responsibilities for local governments to contact, refer plans to, and consult with California Native American tribes as part of the adoption or amendment of any general or specific plan proposed on or after March 1, 2005. SB18 requires public notice to be sent to

tribes listed on the Native American Heritage Commission's SB18 Tribal Consultation list within the geographical areas affected by the proposed changes. Tribes must respond to a local government notice within 90 days (unless a shorter time frame has been agreed upon by the tribe), indicating whether or not they want to consult with the local government. Consultations are for the purpose of preserving or mitigating impacts to places, features, and objects described in Sections 5097.9 and 5097.993 of the Public Resources Code that may be affected by the proposed adoption or amendment to a general or specific plan.

Assembly Bill (AB) 52

AB 52 specifies that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource, as defined, is a project that may have a significant effect on the environment. AB 52 provides for consultation between lead agencies and Native American tribal organizations during the CEQA process. It requires a lead agency to begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project, if the tribe requested to the lead agency, in writing, to be informed by the lead agency of proposed projects in that geographic area and the tribe requests consultation, prior to determining whether a negative declaration, mitigated negative declaration, or environmental impact report is required for a project. AB 52 specifies examples of mitigation measures that may be considered to avoid or minimize impacts on tribal cultural resources. The bill makes the above provisions applicable to CEQA projects that have a notice of preparation or a notice of negative declaration filed or mitigated negative declaration on or after July 1, 2015. AB 52 amends Sections 5097.94 and adds Sections 21073, 21074, 2108.3.1., 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3 to the California Public Resources Code (PRC), relating to Native Americans.

AB 52 amended CEQA to address California Native American tribal concerns regarding how cultural resources of importance to tribes are treated under CEQA. CEQA now specifies that a project that may cause a substantial adverse change in the significance of a "tribal cultural resource" [as defined in PRC 21074(a)] is a project that may have a significant effect on the environment. According to the AB 52, tribes may have expertise in tribal history and "tribal knowledge about land and tribal cultural resources at issue should be included in environmental assessments for projects that may have a significant impact on those resources."

The AB 52 process entails the following:

- The CEQA lead agency must begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project, if the tribe requested to the lead agency, in writing, to be informed by the lead agency of proposed projects in that geographic area and the tribe requests consultation.

- A proposed Negative Declaration, Mitigated Negative Declaration (MND), or a Draft EIR cannot be released for public review before the tribe(s) has had the opportunity to request consultation.

- If the tribe(s) requests formal consultation, a MND cannot be released for public review until consultation between the tribe(s) and the lead agency is completed and mitigation

measures acceptable to the tribe(s) are incorporated into the MND and the related MMRP.

AB 52 further defines the following legislative terms:

Tribal Cultural Resource: The passage of AB 52, created a new category of resource called a "tribal cultural resource" (TCR). The statute clearly identifies a TCR as a separate and distinct category of resource, separate from a historical resource. PRC Section 21074 defines a "tribal cultural resource" as any of the following under its subsections (a) through (c):

(a) (1) Sites, features, places, and objects with cultural value to descendant communities or cultural landscapes that are any of the following:

- Included in the California Register of Historical Resources.
- Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
- Deemed to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1.

(a) (2) Sacred places, including, but not limited to, Native American sanctified cemeteries, places of worship, religious or ceremonial sites, or sacred shrines that meet either of the following criteria:

- Listed on the California Native American Heritage Commission's Sacred Lands File pursuant to Section 5097.94 or 5097.96 and a California Native American tribe has submitted sufficient evidence to the lead agency demonstrating that the sacred places are of special religious or cultural significance to the California Native American tribe or contain known graves and cemeteries of California Native Americans.
- Listed or determined pursuant to criteria set forth in subdivision (g) of Section 5024.1 to be eligible for listing in the California Register of Historical Resources.

(b) A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.

(c) A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a "nonunique archaeological resource" as defined in subdivision (h) of Section 21083.2 also may be a tribal cultural resource if it conforms with the criteria of subdivision (a).

California Native American Tribe: PRC Section 21074 defines a "California Native American Tribe" to mean a Native American tribe located in California that is on the contact list maintained by the Native American Heritage Commission (NAHC). This definition is broader than the concept of a "federally recognized tribe" that is typically used in implementing various federal laws, including the National Environmental Policy Act (NEPA).

Formal Tribal Consultation: Within 14 days of determining that an application for a project is complete or a decision by a public agency to undertake a project, the lead agency shall provide formal notification to the designated contact of, or a tribal representative of, traditionally and

culturally affiliated California Native American tribes that have requested notice, which shall be accomplished by means of at least one written notification notice that includes a brief description of the proposed project and its location as well as the lead agency contact information, and a notification statement that the federally recognized California Native American tribe has 30 days to request consultation.

Treatment of Mitigation Measures and Alternatives: PRC Section 21080.3.2 provides that as part of the consultation process, parties could propose mitigation measures. If the California Native American tribe requests consultation to include project alternatives, mitigation measures, or significant effects, the consultation would be required to cover those topics. PRC Section 21082.3 provides that any mitigation measures agreed upon during this consultation "shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring program" if determined to avoid or lessen a significant impact on a tribal cultural resource.

Health and Safety Code, Sections 7050 and 7052

Health and Safety Code Section 7050.5 declares that, in the event of the discovery of human remains outside a dedicated cemetery, all ground disturbances must cease, and the county coroner must be notified. Section 7052 establishes a felony penalty for mutilating, disinterring, or otherwise disturbing human remains, except by relatives.

Penal Code, Section 622.5

Penal Code Section 622.5 provides misdemeanor penalties for injuring or destroying objects of historic or archaeological interest located on public or private lands but specifically excludes the landowner.

Regional/Local

Town of Hillsborough General Plan

The Open Space and Conservation Element of the Town's General Plan contains goals, policies, and actions to protect historic and cultural resources. Relevant goals, policies and actions include:

Goal OSC-5 - Support the preservation of important cultural resources found within the community.

> *Policy OSC-5.1* - Preserve Town-owned historical resources when practical and involve the public in the determination of which resources should be preserved.
>
> *Policy OSC-5.2* - Support property owners in their efforts to preserve important private historic structures and apply the Town's adopted Residential Design Guidelines when reviewing development proposals for historic personal residences.
>
> *Action OSC-5.1* - The Town will continue to enforce the Historic Preservation Ordinance.
>
> *Action OSC-5.2* - The Town will require projects subject to the California Environmental Quality Act to analyze impacts to cultural resources per State law. When necessary, the

Town will require the projects to incorporate mitigation measures to reduce adverse impacts to identified cultural resources.

Action OSC-5.3 - The Town will require construction projects to stop if archaeological or paleontological resources are uncovered during grading or other on-site excavation activities. Once the resources are assessed for importance, appropriate mitigation compliant with State law will be determined.

4.4.3 Thresholds of Significance

Potential impacts to cultural and tribal cultural resources were determined in accordance with Appendix G of the CEQA Guidelines. Impacts would be considered potentially significant if the proposed Project will:

A. Cause a substantial adverse change in the significance of a historic resource as defined by CEQA Guidelines Section 15064.5;

B. Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines section 15064.5;

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

D. Cause a substantial adverse change in the significance of a tribal cultural resources, defined in Public Resources Code section 21074 as either a site, feature, place cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is;

    1. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

    2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.

4.4.4 Impacts and Mitigation Measures

The proposed Project consists of updates to the existing 2014 - 2022 Housing Element to reflect the 6th cycle 2023 – 2031 housing assignments; associated amendments to the Land Use Element and General Plan Land Use Map, Open Space and Conservation Element, and Public Safety Element; amendments to Title 17 (Zoning) of the Hillsborough Municipal Code, and amendments to the Hillsborough Zoning Map. These amendments are generally described in sections 3.3.9 through 3.3.12 in Project Description. The proposed amendments described in the Project Description would not result in environmental impacts to cultural resources and tribal cultural resources and are therefore not discussed further in this chapter. The impact analysis focuses on the residential development that would be facilitated by the Draft 2023 – 2031 Housing Element.

Impact CUL-1 – Destruction/Degradation of Historical Resources. *[Threshold of Significance (a)]*

The Project includes goals, policies, and actions to address the housing needs of Hillsborough identified by State law (Government Code §65583). The Draft 2023 – 2031 Housing Element's five approaches to providing housing that meets the RHNA primarily focuses on the development of undeveloped, vacant parcels except for the redevelopment of the Town Hall site and the addition of multi-family housing at the Burlingame Country Club and the Nueva School. The undeveloped parcels identified in the Housing Element do not have historic resources that could be impacted by implementing the Housing Element. The Burlingame Country Club and Nueva School site have identified undeveloped areas within their boundaries in which to locate future multi-family housing that would not impact existing structures.

The existing Town Hall building was constructed between the late 1980s to early 1990s; however, portions of the building that comprise the Police Department Building are original with additions made in the 1950s and 1960s (Email correspondence with Liz Ruess 2023). Therefore, while the Town Hall building is not an identified historic structure listed on any historic register, portions of the Town Hall building may be over 50 years old and, as such, the Town Hall building may be considered a potentially historic structure. Prior to the development of the Town Hall Complex Opportunity Site, the Town Hall buildings would be assessed for their potential historic value according to the Town's Historic Preservation Ordinance, as required by General Plan Action OSC-5.1.

ADUs presented in Housing Element Approach 1 can be located on any residential lot in Hillsborough and could be constructed adjacent to historic residences. General Plan policies, including Policy OSC-5.1, Policy OSC-5.2, and Action OSC-5.1, and Chapter 2.12.070 of the Municipal Code, which require that ministerial projects, including ADUs, must be deemed by the director of building and planning to have little or no negative visual effect, would address the potential impacts ADUs could have on an adjacent historic personal residence.

The Project would not, in and of itself, result in physical construction that could have an impact on cultural resources. However, future residential development facilitated by implementation of the Project could include alteration of historic structures or potentially historic resources that are 50 years or older in the case of the redevelopment of potentially historic buildings that are not currently listed or the alteration of the historic setting of cultural resources in the case of new development immediately adjacent to a potentially historical resource, such as the Town Hall building or any ADUs built adjacent to potentially historic buildings. Given the age of these resources, it is possible they are historically significant and eligible for listing in the CRHR or the NRHP.

Future residential development facilitated by the Project would be subject to existing General Plan goals, policies, and actions related to historic preservation. Relevant General Plan policies and actions include Policy OSC-5.1, which requires protection of Town-owned historic resources, Policy OSC-5.2, which requires application of the Town's Residential Design Guidelines during review of development proposals for historic personal residences, and Action OSC-5.1, which requires continued enforcement of the Town's existing historic preservation ordinance. Further, consultation with the Northwest Information Center (NWIC) of the California Historical Resources Information System (CHRIS) and local information repositories would be

necessary to determine if future proposed development sites contain or have the potential to contain historic resources. Action OSC-5.2 ensures compliance with the provisions of CEQA in relation to potential impacts to cultural resources, including the incorporation of mitigation to reduce adverse impacts to identified cultural resources.

Under CEQA, conformance with the Secretary of the Interior's Standards would normally mitigate impacts on a historic resource to a less-than-significant level. The implementation of existing Town General Plan policies and actions relating to the protection of historic resources and conformance with federal and State requirements, including the Secretary of the Interior's Standards for Rehabilitation, as outlined in Section 4.4.2 Regulatory Setting, would reduce potentially significant impacts of future discretionary development that may be facilitated by the Project to a certain extent. However, without a current, specific development proposal to evaluate, it cannot be guaranteed at this time that future discretionary development projects would fully adhere to the Standards for Rehabilitation, as changes to the eligibility, identification, and condition of historic resources and their surroundings between now and the time that individual development proposals are received for specific sites could affect potential impacts on historic resources. Mitigation Measure CUL-1 below is intended to mitigate the Project's potential impacts on historic resources to a certain extent. However, without knowing the characteristics of the potentially affected historic resource or of the future development proposal, it cannot be guaranteed with certainty that potentially significant impacts will be fully mitigated by the measures within CUL-1. Therefore, the Focused GPU's potential impacts to historic resources would remain ***significant and unavoidable***.

Impact CUL-1: Future development projects that may be facilitated by the Focused GPU may cause substantial adverse changes in the significance of a historic resource, including properties or features eligible for listing in a local, State, or federal register of historic resources.

Mitigation Measure CUL-1: Prepare Historic Resource Evaluation. For any individual development project within the Planning Area that the Town determines may involve a property that contains a potentially significant historic resource, the resource shall be assessed by a professional who meets the Secretary of the Interior's Professional Qualifications Standards to determine whether the property is a significant historic resource and whether or not the project may have a potentially significant adverse effect on the historic resource. If, based on the recommendation of the qualified professional, the Town determines that the project may have a potentially significant effect, the Town shall require the applicant to implement the following mitigation measures:

(g) Adhere to at least one of the following Secretary of the Interior's Standards:

- Secretary of Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings; or
- Secretary of Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings.

The qualified professional shall make a recommendation to the Town as to whether the project fully adheres to the Secretary of the Interior's Standards, and any specific modifications necessary to do so. The final determination as to a project's adherence to

the Standards shall be made by the Town body with final decision-making authority over the project. Such a determination of individual project adherence to the Secretary of the Interior's Standards will constitute mitigation of the project historic resource impacts to a less-than-significant level (CEQA Guidelines section 15064.5).

(h) If measure (a) is not feasible, the historic resource shall be moved to a new location compatible with the original character and use of the historic resource, and its historic features and compatibility in orientation, setting, and general environment shall be retained, such that a substantial adverse change in the significance of the historic resource is avoided. Implementation of measure (b) would reduce the impact to a less-than-significant level.

If neither measure (a) nor measure (b) is feasible, then the Town shall implement the following measures in the following order:

(i) Document the historic resource before any changes that would cause a loss of integrity and loss of continued eligibility. The documentation shall adhere to the Secretary of the Interior's Standards for Architectural and Engineering Documentation. The level of documentation shall be proportionate to the level of significance of the resource. The documentation shall be made available for inclusion in the Historic American Building Survey (HABS) or the Historic American Engineering Record (HAER) Collections in the Library of Congress, and the California Historical Resources Information System (CHRIS), as well as local libraries and historical societies.

(j) Apply the Secretary of the Interior's Standards for the retention and reuse of the historic resource and in all alterations, additions, and new construction.

(k) Through careful methods of planned deconstruction to avoid damage and loss, salvage character-defining features and materials for educational and interpretive use on-site, or for reuse in new construction on the site in a way that commemorates their original use and significance. The deconstruction, salvage, and reuse shall be conducted according to the Secretary of Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings.

(l) Interpret the historical significance of the resource through a permanent exhibit or program in a publicly accessible location on the site or elsewhere within the Planning Area.

Impact CUL-2 – Potential Disturbance of Archaeological Resources. *[Threshold of Significance (b)]*

Future residential development facilitated by the Project may result in direct or indirect impacts to both prehistoric and historic buried archaeological resources. Construction activities such as grading and excavation may result in the accidental destruction or disturbance of archaeological sites. Additionally, development may draw the public to gather in areas with visible archaeological resources, resulting in destruction, illicit collection, or prospecting by unauthorized persons.

Actions OSC-5.2 and OSC-5.3 of the General Plan Open Space and Conservation Element require the evaluation and protection of uncovered cultural resources. Action OSC-5.2 requires compliance with CEQA provisions in relation to cultural resources, including the incorporation of mitigation to reduce adverse impacts to identified cultural resources. Action OSC-5.3 includes provisions to stop project construction activities if archaeological or paleontological resources are discovered, and to assess and mitigate impacts to said resources per State law.

Implementation of General Plan actions identified above as well as compliance with federal and State law would reduce potential impacts to archaeological resources to ***less than significant***.

Impact CUL-3 – Potential for Disturbance of Human Remains. *[Threshold of Significance (c)]*

The disturbance or destruction of a significant Native American resource is considered a significant impact. Although not anticipated, human remains may be identified during site preparation and grading activities, which could result in a potentially significant impact to Native American cultural resources.

The Town's General Plan does not contain policies or actions geared specifically toward the protection of human remains. Mitigation Measure CUL-2 below would reduce potential impacts to undiscovered human remains and would be applicable to all future development facilitated by implementation of the Project. Implementation of Mitigation Measure CUL-2 and the Town's development review process would reduce potential impacts to human remains to ***less than significant with mitigation incorporated.***

Impact CUL-2: Construction activities, particularly excavation for building foundations, trenching for utilities, and development of roadways, associated with residential development projects facilitated by the Project may disturb human remains during construction.

Mitigation Measure CUL-2: Procedures if Human Remains are Encountered. For future development of individual projects within the Planning Area, if human remains are encountered during ground-disturbing activities within specific project sites, the project contractor and/or on-site supervisor shall provide certification to the Town Planning Division that work within 50 feet of the discovery is stopped. The project contractor shall immediately notify the San Mateo County Coroner (Coroner) upon the discovery of any human remains.

At the same time, a qualified archaeologist meeting federal criteria under 36 CFR 61 shall be contacted by the project applicant(s) and project contractor, in coordination with the Town Planning Division, to assess the situation and consult with the appropriate agencies. If the human remains are of Native American origin, the Coroner shall notify the NAHC within 24 hours of this identification. The NAHC will identify a Most Likely Descendant (MLD) to inspect the site and provide recommendations for the proper treatment or disposition, with proper dignity, of the remains and any associated grave goods.

Upon completion of the assessment, the qualified archaeologist shall prepare a report documenting the background to the finds and provide recommendations for the treatment of the human remains and any associated cultural materials, as appropriate and in coordination with the recommendations of the MLD. The report shall be submitted to the project applicant, the Town Planning Division, and the NWIC. Once the report is reviewed and approved by the Town

Planning Division, and any appropriate treatment completed, project construction activity within the area of the find may resume. If the MLD does not make recommendations within 48 hours the project applicant(s) shall reinter the remains in an area of the property secure from further disturbance. If the project applicant(s) does not accept the MLD's recommendations, the applicant(s) or the MLD may request mediation by the NAHC.

Impact TRIB-1 – Adverse Change in Significance of Tribal Cultural Resources. *[Thresholds of Significance (d)(1) and (d)(2)]*

Under CEQA, a significant resource is one that is listed in a California or local historic register or is eligible to be listed. As such, lead agencies have a responsibility to evaluate such resources against the California Register criteria prior to making a finding as to a proposed project's impacts to historical resources (PRC § 21084.1, 20174, 14 CCR § 15064.5(3). Any ground disturbing work in native soils has the potential for archaeological discovery which, if Native American in origin, could be considered a TCR. Disturbance of a TCR would constitute a change in significance and is thus a significant impact.

On May 11, 2023, the NAHC provided MIG with a consultation list of tribes with traditional lands or cultural places located within the boundaries of the Planning Area and recommended contact with the tribes in compliance with Senate Bill 18 (SB 18) and Assembly Bill 52 (AB 52) (SB 18 and AB 52 are described in detail in Section 4.4.2).

On June 15, 2023, MIG sent certified letters and emails to each of the eight tribes on the consultation list to inform them of the Project, request information pertaining to Native American cultural concerns within the Planning Area, and request to be contacted if there were any Native American cultural concerns with the Project. The Town received no replies. The 45-day comment period ended September 13, 2023.

On June 13, 2023, the NAHC sent a response to the 6th Cycle Housing Element EIR NOP. The NAHC NOP response outlined State law provisions for discussion of tribal cultural resources and SB 18 and AB 52 tribal consultation (if requested). The NAHC NOP response also made recommendations for cultural resource assessments, Sacred Lands File searches, Native American tribal consultation, and general mitigation approaches. No other replies pertaining to cultural resources or tribal cultural resources have been received by the Town.

Development facilitated by the Project could disturb unrecorded sensitive archaeological resources or TCRs in the Planning Area. Contact with such resources during construction activities could result in a significant impact. While implementation of the Town's development review process, including application of relevant General Plan policies, may reduce the significance of potential TCR impacts to a certain extent, the nature of the potential TCR impacts of any future discretionary development is currently unknown and, as such, the ability of the Town's development review process and General Plan policies to fully reduce impacts is not guaranteed. As such, mitigation is required to reduce the Project's potentially significant TCR impacts. Mitigation Measure TRIB-1 is included below to reduce any potential impacts to TCRs to ***less than significant with mitigation incorporated.***

Impact TRIB-1: Construction activities, particularly excavation for building foundations, trenching for utilities, and development of roadways, associated with residential development projects facilitated by the Project may disturb tribal cultural resources during construction.

Mitigation Measure TRIB-1: Procedures for Discovery of Tribal Cultural Resources. Upon discovery of any tribal cultural or archaeological resources, cease construction activities in the immediate vicinity of the find until the find can be assessed. All tribal cultural and archaeological resources unearthed by project construction activities shall be evaluated by the qualified archaeologist and tribal monitor/consultant. If the resources are Native American in origin, interested Tribes (as a result of correspondence with area Tribes) shall coordinate with the landowner regarding treatment and curation of these resources. Typically, the Tribe will request preservation in place or recovery for educational purposes. Work may continue on other parts of the project while evaluation takes place.

- Preservation in place shall be the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavation to remove the resource along the subsequent laboratory processing and analysis. All tribal cultural resources shall be returned to the Tribe. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be offered to the Tribe or a local school or historical society in the area for educational purposes.
- Archaeological and Native American monitoring and excavation during construction projects shall be consistent with current professional standards. All feasible care to avoid any unnecessary disturbance, physical modification, or separation of human remains and associated funerary objects shall be taken. Principal personnel shall meet the Secretary of the Interior standards for archaeology and have a minimum of 10 years' experience as a principal investigator working with Native American archaeological sites in Southern California. The Qualified Archaeologist shall ensure that all other personnel are appropriately trained and qualified.

4.4.5 References

Email correspondence with Liz Ruess, Town of Hillsborough Planning Manager. September 3, 2023 and September 6, 2023.

Native American Heritage Commission (NAHC). 2023. Re: Native American Consultation, Pursuant to Senate Bill 18 (SB18), Government Codes §65352.3 and §65352.4, as well as Assembly Bill 52 (AB 52), Public Resources Codes §21080.1, §21080.3.1 and §21080.3.2, Town of Hillsborough General Plan and Housing Element Update Project, San Mateo County. May 11, 2023.

Native American Heritage Commission (NAHC). 2023. Re: 2023060305, Town of Hillsborough 6th Cycle Housing Element and Focused General Plan Update and Municipal Code Update Program EIR, San Mateo County. June 13, 2023.

Town of Hillsborough. 2005. Hillsborough General Plan. March 14, 2005.

Town of Hillsborough. 2018. Meadowood Estates Subdivision Project Draft Environmental Impact Report. Section 4.4 Cultural, Historic, and Tribal Cultural Resources. October 2018.

4.5 Energy

This chapter provides information on the environmental and regulatory energy setting of the planning area and evaluates the potential energy impacts associated with implementation of the Focused GPU (the Project). Energy resources are closely tied to impacts discussed in the Air Quality (Section 4.2) and Greenhouse Gas (Section 4.7) analyses in this EIR. As such, many of the values presented in this Section reflect values derived from the emissions modeling conducted for the Project. Refer to Appendix C for detailed GHG emissions estimates and information on energy usage (MIG, 2023).

4.5.1 Environmental Setting

Energy is primarily categorized into three areas: electricity, natural gas, and fuels used for transportation. The following describes the various types of energy, as well as where the energy is generated, how it is used, and the quantities in which it is consumed.

Defining Energy: Sources, Units, and Means of Production

Electricity

Electricity is the flow of electrical power or charge (i.e., the movement of electrons between atoms). It is produced by converting sources of primary energy such as coal, natural gas, nuclear, hydropower, wind, and solar, into electrical power through various means.

Generators and solar photovoltaic (PV) cells are two of the primary pieces of equipment used to produce and supply electricity to the grid. The following describes the processes through which electricity is generated by these pieces of equipment.

- **Generators.** Turbine generators convert mechanical or chemical energy into electricity. At its simplest form, an electrical generator is an electromagnet, moving wire near a magnet to direct the flow of electricity. Turbine generators do this by using a moving fluid (e.g., water, steam, combustion gases, or air) to push rotator blades that are attached to a generator. The rotation of magnets and wires within the generator produces an electromagnetic current, directing electrical flow.
- **Solar Photovoltaic Cells.** Solar PV cells convert solar energy directly into electricity. They are made up of semiconductor material that absorbs sunlight and generates an electrical current. This current is captured and transferred to wires so that it can be utilized at a different location.

Electricity production can be grouped into two main categories; electricity that is generated from renewable sources (e.g., solar and wind) and electricity that is generated from non-renewable sources (e.g., fossil fuel combustion). Table 4.5-1 and Table 4.5-2 summarize the primary renewable and non-renewable sources of electricity, respectively, as well as how the energy from the various sources is converted into electricity.

Table 4.5-1: Renewable Sources of Electricity Production	
Source	**Electricity Production Process**
Wind	Wind can be converted to electricity through the use of a wind turbine (historically referred to as "wind turbine generators"). Electricity from this source is produced when wind causes the turbine's blades to rotate. The amount of electricity generated by a wind turbine is dependent on a number of factors, but is primarily related to how much wind energy can be collected at a given time. Wind turbines with longer blades have the capacity to generate more electricity than those with smaller blades, because they can collect more of the wind's energy. A small wind turbine could generate a similar output as a larger one, but the smaller one would need to be subject to much higher wind speeds. Wind power plants, or wind farms, are composed of multiple wind turbines spread out over a large area.
Solar	The sun’s energy can be converted into electricity by using solar PV cells, which produce electricity when photons from the solar energy are absorbed by the semiconductor material in the PV cell. Electrons are dislodged from the semiconductor material and absorbed by electrical conductors, which are connected in an electrical circuit. Electricity flows through the electrical circuit to an external device, such as a battery or an inverter.(A) Solar energy production can be increased with additional PV cells. PV cells can be connected in solar panels, and groups of solar panels can be connected into a solar array. One PV cell may power small devices such as calculators, small solar arrays may power individual residential or commercial buildings, and large arrays may produce power for utilities.
Hydroelectric	Hydroelectric energy is produced by using a naturally-flowing water source (e.g., from a river or dam) to spin the blades of a turbine, which is typically located on or adjacent to the body of water. Water is piped from a location upstream of the facility, through the turbine, and released back into the environment on the downstream side of the facility. The amount of electricity produced by a hydroelectric generator can be regulated by controlling the amount of water flowing through the turbine at a given time (e.g., greater water flow would produce more electricity).
Geothermal	Geothermal energy is produced by utilizing underground high-temperature thermal resources to create steam (or superheat an evaporative or other working fluid) that turns a turbine. Hot water is piped in one side of the system, used to turn the turbine, then piped back to a cooling tower before being piped underground. These power plants can pipe steam or hot water from wells that reach up to two miles into the earth.

Table 4.5-2: Non-Renewable Sources of Electricity Production	
Source	**Electricity Production Process**
Fossil Fuels	Combusting fossil fuels releases energy that can be harnessed and turned into electricity. The change in air pressure as a result of burning the material can be used to create a mechanical process that rotates a generator (e.g., using the hot air from the combusted material to move rotator blades within a generator or pistons within an internal combustion engine). Fossil fuels are hydrocarbons formed from plant and animal remains that were placed under heat and pressure from layers of sand, silt, and rock. Fossil fuels can include coal, crude oil, and natural gas. Petroleum products such as gasoline and diesel are produced from refining fossil fuels.
Nuclear	Nuclear reactors convert energy to electricity by using the heat from a nuclear reactor to turn liquid water into steam that rotates a turbine. Although nuclear energy is not renewable, it is often considered "green" and considered alongside renewable sources because it is a carbon-free source of electricity.
Source: U.S. EIA 2022a	

Electricity is measured in Watts, a unit of power. Watts may be described in various quantities using kilo-, mega-, and giga-, prefixes, which correspond to one-thousand, one-million, and one-billion of something, respectively. For context, these prefixes are typically used in the following contexts when describing electricity production and consumption.

- **Watts (W)** are used as a measurement for small devices. For example, the solar powered calculator may use 1 Watt. A lightbulb may use 50 Watts.
- **Kilowatts (kW)**, or 1,000 Watts, are typically used to describe large appliance and building-scale electricity consumption. For example, the average California household consumed 6,174 kilowatt-hours (kWh) of electricity in 2019 (CEC 2021a).
- **Megawatts (MW)**, or 1,000 kW, or one million Watts. Megawatts may be used when discussing utility systems.
- **Gigawatts (GW)**, or 1,000 MW, one million kW, or one billion watts. Gigawatts may used when discussing statewide electricity generation. For example, in 2021, California generated 194,127 GWh of electricity in-state (U.S. EIA 2022b).

Electricity use over time can be measured in watt-hours (Wh), where, for example, one kWh is the equivalent of one kW generated or consumed over the course of one hour. For example, if a 50 W lightbulb was on for one hour it would consume 5 Wh (or 0.05 kWh) of electricity. If it was on for 100 hours, it would consume 5 kWh of electricity.

Natural Gas

Natural gas is a fossil fuel-based energy source that is typically found between layers of rock or with deposits of crude oil. Natural gas can be extracted by drilling in wells or fracking. After extraction, natural gas is sent to a processing facility and then to storage or to natural gas companies.

Biomethane, also known as renewable natural gas, can be used as a substitute for fossil natural gas. Biomethane is a gas formed from the decomposition of organic matter, composed primarily of methane and carbon dioxide. It can be produced from solid waste landfills, wastewater

treatment plants, food waste, organic waste, and livestock farms. Biomethane is then treated to remove contaminants and gases such as carbon dioxide until the methane content is greater than 90 percent (U.S. EPA 2022a).

Natural gas can be measured in units such as therms or British thermal units (Btu), which are quantities of heat, or cubic feet, which is a volume. The U.S. EIA defines a Btu as the quantity of heat required to raise the temperature of 1 pound of liquid water by 1 degree Fahrenheit at the temperature at which water has its greatest density (approximately 39 degrees Fahrenheit) (U.S. EIA 2023a). One therm is the equivalent of 100,000 Btu. Since heat quantity and volume cannot be converted directly, there is not one conversion rate between therms and cubic feet. However, the units can be converted if the heat content per volume is known. The average heat content of natural gas in 2020 was approximately 1,037 Btu per cubic foot (U.S. EIA 2021a).

Fuels Used for Transportation

Fuels used for transportation may include diesel, gasoline, natural gas, electricity, and hydrogen. Diesel, gasoline, and natural gas fuels have traditionally been refined from crude oil. Combusting these fuel sources in an engine releases energy that can be transferred into making an object move (e.g., rotating a vehicle's driveshaft or a boat's propeller). Diesel, which can also be biomass based,[22] is typically used in larger pieces of equipment, such as trucks, trains boats, buses, farm equipment, and construction equipment. Gasoline (which may be blended with other liquids, such as ethanol), electricity, and hydrogen fuel cells[23] are primarily used to power passenger vehicles.

Historical and Current Energy Production and Consumption Habits

National

Total energy consumption in the United States has increased in recent decades; however, per capita energy consumption has generally decreased since the year 2000. This is due to factors such as greater energy efficiency in appliances, vehicles, and utility scale electricity generation and a reduction in energy-intensive manufacturing (U.S. EIA 2022c). The following describes historical energy production and consumption trends in the United States.

Electricity

The mix of energy sources for electricity generation in the United States has shifted in recent decades, but has primarily consisted of electricity generated from natural gas, coal, nuclear, hydroelectric, wind, and solar energy sources. Table 4.5-3 and Figure 4.5-1 depict the overall quantity and make-up of electricity production in the United States over the last six years.

[22] Biodiesel and renewable diesel are both produced from non-petroleum sources such as vegetable oil and animal fat. Biodiesel is consumed after it is blended with petroleum diesel. While renewable diesel may also be blended with petroleum diesel, renewable diesel can be transported and combusted directly without needing to be blended with petroleum.

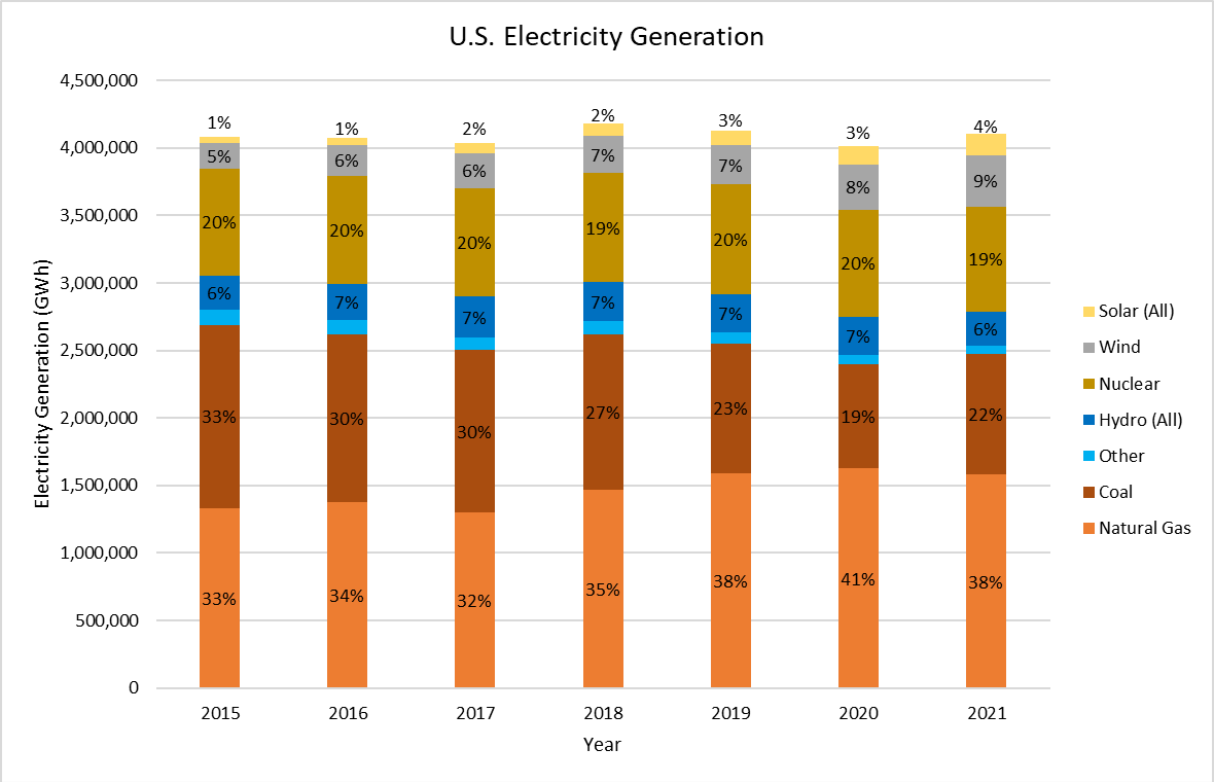
[23] Hydrogen fuel cells are powered by compressed hydrogen gas that feeds into a fuel cell stack, where the hydrogen's chemical energy is converted into electricity.

Table 4.5-3: United States Electricity Generation (2015 to 2021)							
	Electricity Produced Per Calendar Year (Million GWh)						
Energy Source	2015	2016	2017	2018	2019	2020	2021
Natural Gas	1,335	1,379	1,298	1,472	1,589	1,627	1,579
Coal	1,352	1,239	1,206	1,149	965	773	898
Nuclear	797	806	805	807	809	790	778
Hydroelectric	249	268	300	293	288	285	252
Wind	191	227	254	273	296	338	378
Solar	39	55	77	93	107	131	164
Other(A)	116	104	95	94	77	66	59
Total Electricity	4,079	4,078	4,035	4,181	4,131	4,010	4,108
Fossil Fuels(B)	2,687	2,618	2,504	2,621	2,553	2,400	2,477
Non-Hydroelectric Renewables(C)	230	282	332	366	403	469	543
Total Carbon Free Electricity(D)	1,276	1,355	1,437	1,466	1,500	1,544	1,572
Sources: U.S. EIA 2022d and U.S. EIA 2022e							

As shown in Table 4.5-3 and Figure 4.5-1, electricity production had some variability between 2015 and 2021, but mainly fluctuated between 4,000 and 4,100 million GWh of production on an annual basis. Electricity production from fossil fuels (natural gas and coal), while remaining the predominant source of energy for electricity, decreased from a combined composition of approximately 66 percent in 2015 to approximately 60 percent in 2021. It should also be noted that there was a large shift away from coal and toward natural gas over this timeframe. Whereas the total contribution from coal and natural gas to electricity production during 2015 was approximately equal at 33 percent, during 2021, this changed to a contribution of 38 percent and 22 percent for natural gas and coal, respectively; a 16 percent difference.

Nuclear power plants were the second largest generator of electricity nation-wide, while electricity from renewable sources (e.g., solar, wind, hydroelectric) comprised less than a quarter of all electricity production. The overall electricity contribution from renewable sources, and in particularly wind energy, almost doubled over the 2015 to 2021 timeframe.

Figure 4.5-1: United States Energy Sources for Electricity Generation (2015 to 2021)



Source: U.S. EIA 2022d and U.S. EIA 2022e

Note: The percentages for "Other" sources are not depicted in the figure, but generally include electricity production from petroleum coke and liquids, other gases, geothermal, and biomass. Annual values for the "Other" energy sources between 2015 and 2021 ranged between 3 percent in 2015 to 1 percent in 2021.

Natural Gas

Natural gas consumption nationwide has increased in recent decades. In 1990, the U.S. consumed 198 trillion therms of natural gas, which increased to approximately 217 trillion therms in 2021 (U.S. EIA 2012 and 2022f).

Transportation Fuels

Petroleum products (e.g., gasoline and diesel) have historically been the predominant form of energy used within the transportation sector. Annual daily consumption of gasoline in the transportation sector increased from approximately 85.7 billion gallons per year in 1970 to approximately 129.3 billion gallons per year in 2021, an approximately 51 percent increase (U.S. EIA 2023b). Gasoline consumption has fluctuated slightly since 2007 (i.e., increasing and decreasing) but has generally remained at or around 135 billion gallons per year, deviating only from the trend at the start of the COVID-19 pandemic in 2020.

The use of diesel fuel increased at a substantially faster rate across the 1970 to 2021 timeframe, from approximately 11.3 billion gallons of consumption in 1970 to approximately 47.1 billion gallons in 2021, an approximately 317 percent increase (U.S. EIA 2023b). Unlike gasoline consumption, which is still slightly down from pre-COVID-19 levels, diesel consumption has generally remained constant. Although petroleum productions are the primary forms of energy used within the transportation sector, other fuels are used to lesser extents, including jet fuel (also petroleum), natural gas, biofuels, and other sources (e.g., fuel oil, lubricants, propane, and electricity).

In 2021, petroleum products (gasoline, diesel, and jet fuel) accounted for approximately 90 percent of energy consumption in the transportation sector nationwide (U.S. EIA 2022g). Gasoline is currently the main transportation fuel used in the United States, accounting for approximately 54 percent of energy consumption in the transportation sector, followed by diesel at 23 percent, and jet fuel at 11 percent. Electricity accounted for less than one percent of energy consumption in the U.S. transportation sector in 2021 (U.S. EIA 2022h).

State

According to the U.S. EIA, California is the most populous state in the United States, representing 12 percent of the total national population, has the largest economy, and is second only to Texas in total energy consumption. However, California has one of the lowest per capita energy consumption levels in the United States. This is a result of California's mild climate, extensive efforts to increase energy efficiency, and implementation of alternative technologies. California leads the nation in electricity generation from solar, geothermal, and biomass resources (U.S. EIA 2022i).

Electricity

As discussed above, California has one of the lowest per capita energy consumption levels in the United States, which, in part, is attributable to its extensive efforts to increase energy efficiency. The State has also passed several legislative bills that have required retail-energy suppliers to increase the amount of renewable electricity supplied to customers. California's annual electricity generation and the sources that created it for the 2015 through 2021 calendar years are presented below in Table 4.5-4 and Figure 4.5-2.

Table 4.5-4: California Electricity Generation (2015 to 2021)

Energy Source	Electricity Produced Per Calendar Year						
	2015	2016	2017	2018	2019	2020	2021
Natural Gas	130	106	98	100	95	101	105
Coal	18	12	12	9	8	7	8
Petroleum / Other	<0.1	<0.1	<0.1	<0.1	<0.1	1	1
Nuclear	27	27	27	26	25	25	26
Hydroelectric	19	19	20	20	20	20	19
Wind	24	26	27	33	28	30	32
Solar	18	24	30	33	34	36	39

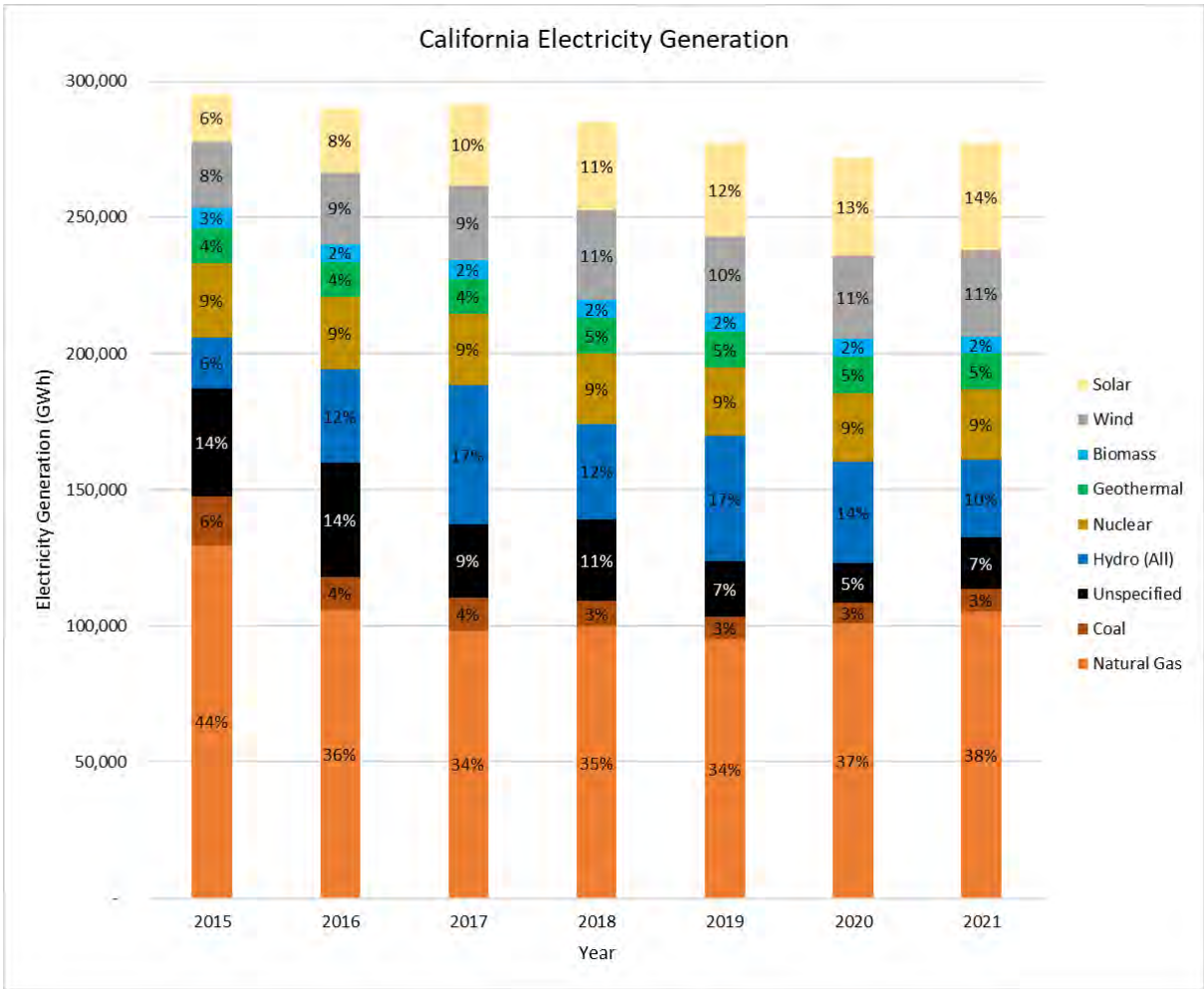
Table 4.5-4: California Electricity Generation (2015 to 2021)							
Energy Source	Electricity Produced Per Calendar Year						
	2015	2016	2017	2018	2019	2020	2021
Biomass	8	7	7	7	7	7	6
Unspecified(A)	40	42	27	30	20	20	19
Total Electricity(B)	295	291	292	285	278	273	278
Fossil Fuels(C)	*148*	*118*	*111*	*110*	*104*	*109*	*114*
Non-Hydroelectric Renewables(D)	*62*	*69*	*77*	*85*	*82*	*86*	*90*
Total Carbon Free Electricity(E)	*108*	*115*	*123*	*130*	*127*	*132*	*136*
Sources: CEC 2022a, U.S. EIA 2022d							

As shown in Table 4.5-4 and Figure 4.5-2, overall electricity consumption throughout California has decreased over the 2015 to 2021 timeframe, from approximately 295 million GWh to 278 million GWh (an approximately 6 percent decrease). Perhaps more notable than the overall decrease in electricity production, however, is the change in the electricity energy portfolio. As shown in Figure 4.5-2, electricity production from natural gas and coal power plants has decreased from a combined total of 50 percent of the total energy supply, to approximately 41 percent. Biomass, geothermal, and nuclear sources have remained relatively constant at 2 percent, 4 percent to 5 percent, and 9 percent, respectively, while electricity generated from geothermal, wind, and solar sources has increased. Electricity production from solar had one of the biggest relative increases in electricity production, increasing from approximately 6 percent to 14 percent between 2015 and 2021, respectively, (an approximately 150 percent increase). In 2021, over half of California's electricity was generated from carbon-free sources, including renewables, nuclear, and hydroelectric.

Similar to U.S. electricity generation, California electricity generation has shifted, with coal decreasing, renewables increasing, and nuclear and hydroelectric remaining relatively constant. However, while the direction of the shift in energy sources on the national and statewide level is the same, California's energy mix has twice the amount of electricity generated from renewable sources compared to the rest of the U.S.[24] California also uses a lower percentage of fossil fuels, mainly due to its low coal consumption.

[24] Whereas approximately 33 percent of electricity in California is from renewable sources, only 13 percent of electricity generated in the lower 48 states is from renewable sources.

Figure 4.5-2: California Energy Sources for Electricity Generation (2015 to 2021)



Sources: CEC 2016, CEC 2017, CEC 2018, CEC 2019, CEC 2020, CEC 2021b, CEC 2022a

Note: Unspecified power is power that could not be traced to a facility, and would include a mix of fuel types.

Natural Gas

Annual natural-gas consumption in the State has fluctuated since the 1970s, but generally remained at or around 16,000 million therms since the 1990s (U.S. EIA 2022j). Although California has historically accounted for approximately 10 percent of annual nationwide natural gas consumption, its reserves and production constitute less than 1 percent of the total United States (U.S EIA 2022i and U.S. EIA 2022k).

In 2020, California consumed about 15,120 million therms of natural gas, with the majority of that consumption attributable to the industrial sector (50 percent) followed by the residential (31 percent) and commercial (16 percent) sectors. Approximately 88 percent of Californian homes used natural gas in some building system capacity, including space heating (55 percent of

homes), water heating (75 percent of homes), and/or cooking appliance(s)[25] (70 percent of homes) (U.S. EIA 2022l and U.S. EIA 2022m).

Transportation

California's transportation sector consumed 59.6 million Btu of energy per capita in 2020, which ranked 46th in the nation (U.S. EIA, 2021b). This means that California had the 6th best transportation energy per capita rate (i.e., most efficient) in the United States, including the District of Columbia. Much of the State's efficiency with regard to the amount of transportation energy consumed per capita can be attributed to the increase in vehicle fuel efficiency standards required by the State.

California's production of gasoline and diesel fuels supplies both in- and out-of-state demand; however, most gasoline and diesel fuel sold in California for motor vehicles is refined within the state to meet state-specific formulations required by the California Air Resources Board (CARB) (i.e., these fuels typically are not imported from out of state). Crude oil extraction and production has been decreasing since the 1980s (from 402 million barrels in 1986 to 200 million barrels in 2020) and is projected to continue to decline (CARB 2022a).

According to taxable sales figures available from the California Department of Tax and Fee Administration, both gasoline and diesel sales have declined statewide since 2013. Gasoline sales saw the most notable decrease (an approximately 21 percent drop) from approximately 14,533 million gallons in 2013 to approximately 11,410 million gallons in 2022. This trend has not been linear, however. Gasoline sales increased from 2013 to 2017, remained relatively constant between 2017 and 2019, and then started to decrease rapidly across the 2020 to 2022 timeframe. This decrease is most likely attributable to the shelter-in-place orders imposed due to the COVID-19 pandemic, but is also likely associated with vehicle turnover (i.e., from older, less fuel efficient cars to newer models) across the same timeframe. Diesel fuel sales also decreased between 2013 and 2020, from approximately 2,740 million gallons in 2013 to approximately 2,596 million gallons in 2022 (an approximately 5 percent decrease). Unlike gasoline sales, which began to decrease in 2020, diesel sales tended to increase between 2013 and 2021, only decreasing below 2013 levels in 2022 (CDTFA, 2023).

In 2022, California reached a milestone 1 million ZEVs sold, accounting for 40 percent of all ZEVs operating in the U.S. (Office of Governor Gavin Newsom 2022). Most of the ZEVs sold to date have been electric vehicles; however, vehicles powered by hydrogen fuel cells have also been expanding in availability and use. CARB estimated that by 2021, 9,463 hydrogen fuel cell vehicles had been registered in California. Of these vehicles, 7,993 had an active registration and were assumed to be in use (CARB 2021).

Transportation fuels are not used equally across different vehicle types in the state. For example, whereas light-duty vehicles (e.g., cars and pick-up trucks) are mainly powered by gasoline and electricity, medium- and heavy-duty vehicles (e.g., work trucks, semi-trucks, etc.) are generally powered by diesel. Natural gas can also be used as a fuel source in trucks and

[25] Cooking appliances includes natural gas ranges, cooktops, and ovens; natural gas outdoor grills are not included in this metric.

buses. Table 4.5-5 below shows a breakdown of the state-wide vehicle population in 2022, by fuel type.

Table 4.5-5: California Transportation Fuels by Vehicle Type (2022)

Vehicle Type	Breakdown in Fuel Type				
	% Gasoline	% Diesel	% Natural Gas	% Electricity	% Plug-in Hybrid(A)
Medium- and heavy-duty trucks	8.3	88.7	3.0	0.0	0.0
Light heavy-duty trucks	53.7	46.3	0.0	0.0	0.0
Buses	33.9	47.6	18.2	0.3	0.0
Light-duty vehicles	96.1	0.5	0.0	2.1	1.3
Source: EMFAC2021					

Local

Electricity

Electricity is provided to the Town primarily by Peninsula Clean Energy (PCE) and also by Pacific Gas and Electric Company (PG&E) (for customers that wish to opt out of PCE's rates and service). PCE is San Mateo County's Community Choice Aggregate (CCA), a community-controlled, not-for-profit joint powers agency. PCE procures sources of electricity throughout San Mateo County, while PG&E manages and maintains the electrical infrastructure used to supply consumers with electricity. In 2021, San Mateo County consumed approximately 4,157 GWh of electricity, about 2 percent of the state's total electricity generated that year (CEC 2023a). The residential sector comprised approximately 40 percent of county-wide electricity consumption, while the non-residential sector comprised the remaining 60 percent.

Based on data available from the San Mateo County Regional Climate Action Planning Site (RICAPS) Program, residential land uses in the Town are estimated to have consumed approximately 46.1 total GWh of electricity in 2020 (San Mateo County, ND). Based on a residential building stock of approximately 3,750 units, the Town's electricity energy consumption efficiency was approximately 12,297 kWh per year per dwelling unit, or approximately 4,042 kWh year per capita (kWh/yr/capita), based on a population of approximately 11,410.

Natural Gas

PG&E provides natural gas service to the Planning Area. PG&E is the principal distributor of natural gas services service central and northern California with a service area of over 70,000 square miles (PG&E 2023). In 2021, PG&E sold approximately 4,467 million therms of natural gas, with approximately 42 percent of those sales going to residential land uses (CEC 2023c). San Mateo County consumed approximately 205 million therms of natural gas in 2021 (CEC 2023b). The residential sector comprised approximately 57 percent of county-wide electricity consumption, while the non-residential sector comprised the remaining 43 percent.

Based on data available from the San Mateo County Regional Climate Action Planning Site (RICAPS) Program, residential land uses in the Town are estimated to have consumed approximately 2.8 million therms, or approximately 283 million kBtu (San Mateo County, ND). Based on a residential building stock of approximately 3,750 units, the Town's natural gas energy consumption efficiency was approximately 75,725 kBtu per year per dwelling unit, or approximately 24,888 kBtu year per capita (kBtu/yr/capita), based on a population of approximately 11,410.

Transportation

Retail fuel outlet survey data indicates San Mateo County accounted for approximately 1.9 percent and 0.8 percent of total statewide gasoline and diesel sales, respectively, in 2021 (CEC, 2023d).

4.5.2 Regulatory Framework

Federal

Federal Energy Policy and Conservation Act

In 1975, Congress enacted the Federal Energy Policy and Conservation Act, which established the first fuel economy standards for on-road motor vehicles in the United States. Pursuant to the Act, the National Highway Traffic Safety Administration (NHTSA) is responsible for establishing additional vehicle standards.

Energy Independence and Security Act (EISA) of 2007

On December 19, 2007, the Energy Independence and Security Act of 2007 was signed into law. In addition to setting increased Corporate Average Fuel Economy (CAFE) standards for motor vehicles, the act also includes the following provisions related to energy efficiency:

- Renewable fuel standards (RFS)
- Appliance and lighting efficiency standards
- Building energy efficiency

This federal legislation requires ever-increasing levels of renewable fuels to replace petroleum. The United States EPA (U.S. EPA) is responsible for developing and implementing regulations to ensure transportation fuel sold in the United State contains a minimum volume of renewable fuel. The RFS program regulations were developed in collaboration with refiners, renewable fuel produces, and other stakeholders.

The RFS program was created under the Energy Policy Act of 2005 and established the first renewable fuel volume mandate in the United States. As required under the act, the original RFS program (RFS1) required 7.5 billion gallons of renewable fuel to be blended into gasoline by 2012. Under the Energy Independence and Security Act of 2007 (EISA), the RFS program was expanded in several key ways that laid the foundation for achieving significant reductions of GHG emissions through the use of renewable fuels, for reducing imported petroleum, and for encouraging the development and expansion of our nation's renewable fuels sector. The updated program is referred to as RFS2 and includes the following:

- EISA expanded the RFS program to include diesel, in addition to gasoline;
- EISA increased the volume of renewable fuel required to be blended into transportation fuel from 9 billion gallons in 2008 to 36 billion gallons by 2022;
- EISA established new categories of renewable fuel and set separate volume requirements for each one.
- EISA required the U.S. EPA to apply lifecycle GHG performance threshold standards to ensure that each category of renewable fuel emits fewer GHGs than the petroleum fuel it replaces (U.S. EPA, 2022a).

Additional provisions of the EISA address energy savings in government and public institutions, promoting research for alternative energy, additional research in carbon capture, international energy programs, and the creation of "green jobs."

Federal Vehicle Standards

In 2009, the NHTSA issued a final rule regarding fuel efficiency and GHG emissions from cars and light-duty trucks for model year 2011; and, in 2010, the U.S. EPA and NHTSA issued a final rule regulating cars and light-duty trucks for model years 2012–2016.

In 2010, President Obama issued a memorandum directing the Department of Transportation, Department of Energy, U.S. EPA, and NHTSA to establish additional standards regarding fuel efficiency and GHG reduction, clean fuels, and advanced vehicle infrastructure. In response to this directive, U.S. EPA and NHTSA proposed stringent, coordinated federal GHG and fuel economy standards for model years 2017–2025 light-duty vehicles. The proposed standards projected to achieve 163 grams per mile of carbon dioxide (CO2) in model year 2025, on an average industry fleetwide basis, which is equivalent to 54.5 miles per gallon if this level were achieved solely through fuel efficiency. The final rule was adopted in 2012 for model years 2017–2021.

In addition to the regulations applicable to cars and light-duty trucks described above, in 2011, the U.S. EPA and NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks for model years 2014–2018. The standards for CO_2 emissions and fuel consumption are tailored to three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to the U.S. EPA, this regulatory program will reduce GHG emissions and fuel consumption for the affected vehicles by 6 percent to 23 percent over the 2010 baselines.

In August 2016, the U.S. EPA and NHTSA announced the adoption of the phase two program related to the fuel economy and GHG standards for medium- and heavy-duty trucks. The phase two program will apply to vehicles with model year 2018–2027 for certain trailers, and model years 2021–2027 for semi-trucks, large pickup trucks, vans, and all types and sizes of buses and work trucks. The final standards are expected to lower CO_2 emissions by approximately 1.1 billion metric tons (MT) and reduce oil consumption by up to 2 billion barrels over the lifetime of the vehicles sold under the program (U.S. EPA and NHTSA, 2016).

In August 2018, the U.S. EPA and NHTSA released a notice of proposed rulemaking called Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021-2026 Passenger Cars and Light Trucks (SAFE Vehicles Rule).

On September 27, 2019, the U.S. EPA and the NHTSA published the SAFE Vehicles Rule Part One: One National Program." (84 Fed. Reg. 51,310 (Sept. 27, 2019)). The Part One Rule revoked California's authority to set its own GHG emissions standards and ZEV mandates in California. As a result of the loss of the ZEV sales requirements in California, there may be fewer ZEVs sold and thus additional gasoline-fueled vehicles sold in future years (CARB, 2019).

In April 2020, the U.S. EPA and NHTSA issued the SAFE Vehicles Rule for Model Years 2021-2026 Passenger Cars and Light Trucks (Final SAFE Rule) that decreased stringency from approximately 4 percent to approximately 1.5 percent per year from model year (MY) 2020 levels over MYs 2021–2026. The Final SAFE Rule affects both upstream (production and delivery) and downstream (tailpipe exhaust) CO_2 emissions (CARB 2020) and has been challenged by 23 states. NHTSA repealed and the U.S. EPA rescinded the SAFE Rule Part One in December 2021 and March 2022, respectively, restoring California's authority to implement its GHG standards and ZEV mandates (NHTSA 2022, U.S. EPA 2022c).

State

Title 24 Energy Standards

The CEC first adopted Energy Efficiency Standards for Residential and Nonresidential Buildings in 1978 in response to a legislative mandate to reduce energy consumption in California. Although not originally intended to reduce GHG emissions, increased energy efficiency, and reduced consumption of electricity, natural gas, and other fuels result in fewer GHG emissions from residential and nonresidential buildings subject to the standard. The standards are updated periodically to allow for the consideration and inclusion of new energy efficiency technologies and methods.

Part 11 of the Title 24 Building Standards Code is referred to as the California Green Building Standards Code (CalGreen Code). The purpose of the CalGreen Code is to "improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories: (1) planning and design; (2) energy efficiency; (3) water efficiency and conservation; (4) material conservation and resource efficiency; and (5) environmental air quality." The CalGreen Code is not intended to substitute or be identified as meeting the certification requirements of any green building program that is not established and adopted by the California Building Standards Commission (CBSC).

California's Building Energy Efficiency Standards are updated on an approximately three-year cycle. The 2019 standards focused on three key areas: proposing new requirements for installation of solar photovoltaics for newly constructed low-rise residential buildings, updating current ventilation and Indoor Air Quality (IAQ) requirements, and extending Title 24 Part 6 to apply to healthcare facilities. The 2019 Building Energy Efficiency Standards were approximately 53 percent more than the 2016 Title 24 Energy Standards for residential development and approximately 30 percent more efficient for non-residential development.

The 2022 standards, which were adopted in August 2021, went into effect on January 1, 2023. The 2022 Building Energy Efficiency Standards focuses on establishing or expanding standards for electric heat pumps, for single-family homes to be electric-ready, for solar photovoltaic

system and battery storage, and for ventilation systems (CEC 2021c). In general, the residential and nonresidential mandatory energy efficiency measures are unchanged between the 2019 and 2022 standards. Instead, updates to the CalGreen Code under the 2022 updates include: increased requirements for EV-ready parking, exemptions for tree shade requirements for parking and other areas shaded by solar structures, and additional requirements for CO_2 monitoring in schools.

Executive Order N-19-19

In September 2019, Governor Newsome signed Executive Order N-19-19, which sought to reduce GHG emissions, reduce climate change impacts, and build the economy. This included directing Caltrans to leverage funds to reduce fuel consumption and GHG emissions and directing the Department of General Services to reduce GHG emissions in the state-owned buildings and vehicles. The executive order also requires CARB to:

- Develop new criteria for clean vehicle incentive programs to encourage manufacturers to produce clean, affordable cars,
- Propose new strategies to increase demand in the primary and secondary markets for zero emission vehicles, and
- Consider strengthening existing or adopting new regulations to achieve the necessary greenhouse gas reductions from within the transportation sector.

Renewables Portfolio Standard Program

In 2002, California established its Renewables Portfolio Standard (RPS) Program, with the goal of increasing the percentage of renewable energy in the state's electricity mix to 20 percent of retail sales by 2017. The 2003 Integrated Energy Policy Report recommended accelerating that goal to 20 percent by 2010, and the 2004 Energy Report Update further recommended increasing the target to 33 percent by 2020. The state's Energy Action Plan also supported this goal. In 2006 under Senate Bill 107, California's 20 percent by 2010 RPS goal was codified. The legislation required retail sellers of electricity to increase renewable energy purchases by at least one percent each year with a target of 20 percent renewables by 2010. Publicly owned utilities set their own RPS goals, recognizing the intent of the legislature to attain the 20 percent by 2010 target.

On November 17, 2008, Governor Schwarzenegger signed Executive Order S-14-08 requiring "[a]ll retail sellers of electricity shall serve 33 percent of their load with renewable energy by 2020." The following year, Executive Order S-21-09 directed CARB, under its AB 32 authority, to enact regulations to achieve the goal of 33 percent renewables by 2020.

In October 2015, Governor Brown signed SB 350 to codify ambitious climate and clean energy goals. One key provision of SB 350 is for retail sellers and publicly owned utilities to procure "half of the state's electricity from renewable sources by 2030."

The State's RPS program was further strengthened by the passage of SB 100 in 2018. SB 100 revised the State's RPS Program to require retail sellers of electricity to serve 50 percent and 60 percent of the total kilowatt-hours sold to retail end-use customers from renewable energy

sources by 2026 and 2030, respectively, and requires 100 percent of all electricity supplied to come from renewable sources by 2045.

As part of the package of bills signed into law by Governor Newsom on September 16, 2022, also referred to as the "California Climate Commitment", the State's RPS Program was strengthened once again by adding additional interim clean electricity targets. Specifically, SB 1020 established clean electricity targets of 90 percent by 2035 and 95 percent by 2040 with the intent of advancing the state's trajectory to the existing 100 percent clean electricity retail sales by 2045 (SB 100).

Advanced Clean Cars Program

In January 2012, CARB approved the Advanced Clean Cars (ACC) Program (formerly known as Pavley II) for model years 2017-2025. The components of the ACC program are the Low-Emission Vehicle (LEV) regulations and the ZEV regulation. The Program combines the control of smog, soot, and GHG with requirements for greater numbers of ZEVs into a single package of standards. By 2025, new automobiles under California's ACC Program will emit 34 percent less global warming gases and 75 percent less smog-forming emissions.

Executive Order B-48-18, issued by Governor Brown in January 2018, establishes a target to have five million ZEVs on the road in California by 2030. This Executive Order is supported by the State's 2018 ZEV Action Plan Priorities Update, which expands upon the State's 2016 ZEV Action Plan. While the 2016 plan remains in effect, the 2018 update functions as an addendum, highlighting the most important actions State agencies have taken since 2018 to implement the directives of Executive Order B-48-18.

EO N-79-20, issued by Governor Newsom in September 2020, set a goal that 100 percent of in-state sales of new passenger cars and trucks will be zero-emission by 2035. It also set a goal that 100 percent of medium- and heavy-duty vehicles in the state be zero-emission by 2045 for all operations where feasible and by 2035 for drayage trucks. In addition, this EO set a goal to transition to 100 percent zero-emission off-road vehicles and equipment in the state by 2035 where feasible.

In August 2022, CARB approved the Advanced Clean Cars II program, which sets requirements for ZEV sales and codifies the light-duty vehicle goals in EO N-79-20. The regulation requires new light duty vehicle sales will be 35 percent zero emission or plug in hybrid electric vehicles in 2026, 68 percent in 2030, and 100 percent in 2035.

CARB 2022 Scoping Plan and Anticipated Changes in Energy Consumption

As identified in the CARB 2022 Scoping Plan, California energy consumption is anticipated to shift over the coming decades as the State moves towards carbon neutrality. As part of CARB's plan to achieve carbon neutrality by 2045, the State will decarbonize energy consumption across several primary sectors, including industrial processes, residential and commercial buildings, and transportation. Successful implementation of the 2022 Scoping Plan is anticipated to result in a large reduction in the State's fossil fuel consumption and an increase in carbon-free electricity, hydrogen, and biogas. Unlike the previous scoping plans, the 2022 Scoping Plan relies more heavily on the implementation, adoption, and use of existing technologies to reduce GHG emissions over the coming decades, as opposed to technologies

that need to be developed. The following describes anticipated changes in energy consumption habits over the coming decades, and how the 2022 Scoping Plan, other rules and regulations, and funding strategies, are anticipated to influence the primary sources of energy used within various sectors of the economy.

Residential and Commercial

The 2022 Scoping Plan estimates that new residential and commercial buildings will make up one third to half of the statewide building stock by 2050. The 2022 Scoping Plan calls for ending natural gas in new residential and commercial buildings, replacing gas appliances, and reducing existing natural gas infrastructure. It is anticipated that, under the scenario evaluated in the 2022 Scoping Plan, approximately 90 percent of energy demand in residential and commercial buildings would be for electricity. Remaining building energy demand would be attributable to hydrogen, biomethane, and liquid biofuel, with a minor amount of natural gas and liquid petroleum remaining in the overall building energy consumption portfolio. The 2022 Scoping Plan projects that by 2035, seven million homes will be all-electric or electric-ready and that 100 percent of residential appliance sales would be electric. The 2022 Scoping Plan also projects that 80 percent of appliance sales for commercial buildings will be electric by 2035 and by 2045, 100 percent of the sales will be electric.

Transportation

The 2022 Scoping Plan identifies three categories in the transportation sector where changes in energy consumption would occur: technology (vehicles and refueling infrastructure), fuels, and vehicle miles traveled (VMT).

Per Executive Order (EO) N-79-20, all new passenger vehicles sold in California should be zero-emission by 2035. The EO also calls for all drayage trucks to be zero-emission 2035, and buses and heavy-duty long-haul trucks to be zero-emission by 2045, too, where feasible. Regulations, such as Advanced Clean Cars II, Advanced Clean Trucks, and the proposed Advanced Clean Fleet regulation, along with State incentive programs, would help with the deployment of ZEVs. In addition, California plans to rapidly expand its electric charging infrastructure from approximately 80,000 EV charging stations in 2022 to approximately 250,000 EV stations by 2025, which is over a doubling in EV charging station capacity. This goal would be supported by funding from the CEC, utilities, and other programs. In 2022, the CEC approved a $2.9 billion investment plan for zero-emission transportation infrastructure. The CEC's investment plan, which would be used to install 90,000 of the 170,000 new EV chargers, includes the following breakdown in funding for the 2022-2026 time period (CEC 2022d).

- $1.7 billion for medium- and heavy-duty ZEV infrastructure
- $900 million for light-duty EV charging infrastructure
- $118 million for ZEV manufacturing
- $90 million for hydrogen refueling infrastructure
- $97 million for emerging opportunities such as aviation, locomotive, marine vessels and vehicle-grid integration
- $15 million zero- and near-zero-carbon fuel production and supply
- $15 million for low-carbon fuels
- $10 million for workforce development

Existing ZEVs are primarily fueled by electricity and hydrogen. The production of electricity and hydrogen would continue to increase. Biomethane would be used along with fossil fuels while the development of ZEV technologies for aviation, locomotives, and marine vessels continues. Renewable diesel has increased from approximately 1.8 million gallons in 2011 to approximately 589 million gallons in 2020.

The Scoping Plan aims to reduce VMT per capita by 25 percent below 2019 levels by 2030, and 30 percent below 2019 levels by 2045, which would result in a decrease in energy demand from the transportation sector. The Scoping Plan seeks to achieve this goal through strategies such as increasing funding for public transportation, implementing roadway pricing programs, expanding active transportation infrastructure, and supporting transportation and land use planning.

Increased Demand in Electricity and Alternative Fuel Sources

Electricity demand is anticipated to increase over the coming decades as more building systems, appliances, industrial processes, and vehicles transition to electricity as a primary energy sources. Actions are being taken at the state level to help accommodate the additional demand, while ensuring that necessary increase in capacity will come from renewable sources.

In California, renewable energy and carbon-free energy sources are projected to increase in line with state goals, such as achieving 60 percent renewable resources for electricity by 2030 and 100 percent carbon-free energy sources for electricity by 2045 required by SB 100 (CEC 2021d). California would increase renewable energy infrastructure such as solar arrays and wind turbines so that electricity generated by carbon-free sources would replace electricity generated by natural gas. CARB projects that by 2045 California will add four times the solar and wind capacity and 1,700 times the hydrogen supply. While fossil fuels would still be used, the demand for fossil fuels in 2045 would decrease by 86 percent relative to 2022, including a 94 percent reduction in demand for liquid petroleum.

Local

Town of Hillsborough: Reach Code

On January 9, 2023, the Town adopted an all-electric preferred, with mixed fuel option, Reach Code Ordinance (Ordinance 788, Municipal Code Chapter 15.10). The Town's Reach Code requires all new single-family residential construction to utilize electric space heating and electric water heating. Natural gas ranges/ovens and clothes dryers are permitted, but the electrical infrastructure (i.e., conduit, plugs, etc.) to support all-electric appliances in the future also have to be installed. The Town's Reach Code applies to all residential development, including accessory dwelling units (ADUs).

4.5.3 Thresholds of Significance

In compliance with Appendix G of the State CEQA Guidelines, the Project would result in a significant energy impact if it will:

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.

4.5.4 Impacts and Mitigation Measures

The proposed Project consists of updates to the existing 2014 - 2022 Housing Element to reflect the 6th cycle 2023 – 2031 housing assignments. In addition, associated amendments to the Land Use Element and General Plan Land Use Map, Open Space and Conservation Element, and Public Safety Element; amendments to Title 17 (Zoning) of the Hillsborough Municipal Code, and amendments to the Hillsborough Zoning Map are proposed for consistency of all Town documents, codes, and regulations. These associated amendments are generally described in sections 3.3.9 through 3.3.12 in the Project Description and would not result in environmental impacts because of energy usage. Therefore, they are not discussed further in this chapter. The impact analysis focuses on the residential development that would be facilitated by the Draft 2023 – 2031 Housing Element.

Impact ENG-1 – Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources. *[Threshold of Significance (a)]*

Implementation of the Focused GPU (the Project) would increase the demand for electricity and natural gas within the Town and gasoline and diesel consumption in the region during construction and operation of new land use developments. The following discusses the various forms of energy that would be consumed during construction and operational activities.

Electricity

Construction

Temporary electric power would be required at various construction sites throughout the town as growth occurs under the Focused GPU. Electricity would be consumed by lighting and electronic equipment (e.g., computers) located in trailers used by construction crews, and by small, off-road equipment (e.g., compressors) used during development activities. However, the electricity used for such activities would be temporary and would have a negligible contribution to the overall energy consumption in the Town.

Operational

Residential Development facilitated under the Focused GPU would require electricity for multiple uses, including, but not limited to: building heating and cooling, lighting, appliance use (e.g., washer, dryer, microwave, etc.), and other electronics (e.g., televisions). In addition, electricity use would also increase with greater adoption and reliance on electric vehicles. As described in Section 4.7.4, CalEEMod was used to estimate electricity consumption from land uses associated with the Focused GPU. Vehicle electricity consumption was determined using fuel efficiency, which was calculated through VMT and energy consumption data (in kWh/day) from EMFAC2021 (v1.0.2), and VMT estimates from the traffic analysis. Table 4.5-6 summarizes changes in electricity consumption that would occur over the next approximately 20 years, with and without the Project.

Table 4.5-6: Estimated Focused GPU Electricity Consumption			
	Electricity Consumption (MWh)		
Metric	2040 No Project	2040	2040 No Project to 2040 Housing Element Change
Land Use Electricity Consumption	46,114	55,989	9,875
Vehicle Electricity Consumption	5,732	6,417	686
Total Electricity Consumption	51,846	62,407	10,561
Population	11,410	12,802	1,392
Electricity Consumption Efficiency (MWh/yr/capita)	4.54	4.87	0.33
Source: MIG, 2023 (see Appendix C).			

As shown in Table 4.5-6, Year 2040 modeled electricity consumption with the Focused GPU (the Project) would be approximately 10,561 MWh more than the electricity consumption without the Focused GPU. On an efficiency basis, electricity consumption would also increase (i.e., become less efficient) between 2040 No Project and 2040 Focused GPU conditions by approximately 7 percent. This is largely in part due to the Town's existing Reach Code requirements that prohibit the installation and use of natural gas for space heating and water heating. The energy requirements for space and water heating equipment do not simply go away; rather, they are shifted to electricity, which is why the electricity efficiency appears to be less efficient.

As discussed in Section 4.5.2, CARB's Scoping Plan considers the use of electricity to be an essential component of California's climate strategy. Therefore, electricity use is a necessary utility to support the implementation of the Focused GPU. Although electricity efficiency may be slightly reduced with the proposed Focused GPU, they would be offsetting natural gas consumption, which comes from a non-renewable source. The new housing units identified and planned for in the Housing Element are anticipated to be equally, if not more, efficient than the Town's existing building stock due to statewide mandatory energy requirements outlined in Title 24, Part 6, of the California Code of Regulations (the CALGreen Code) that have improved energy efficiency standards since 2007, when they were first enacted. For these reasons, the potential electricity consumed by future housing projects would not be wasteful, inefficient, or unnecessary. This impact is considered less than significant.

Natural Gas

Construction

Although future project-specific construction activities are not known at this time, typical residential construction activities result in gasoline- and diesel-fuel combustion on- and off-site, heavy-duty construction equipment, worker vehicle trips, vendor vehicle trips, and haul truck trips, (see Impact AIR-2). Heavy-duty construction equipment and vehicles are not typically

powered by natural gas and therefore, the construction of future residential development facilitated by the proposed Project is unlikely to result in the consumption of natural gas in an unnecessary, inefficient, or wasteful manner. The use of construction-related diesel and gasoline is discussed in the next subsection. Potential natural gas use during construction activities associated with future growth would not substantially contribute to overall energy consumption in the town, and would not be unnecessary, inefficient, or wasteful.

Operation

Natural gas consumption from development associated with the Focused GPU would be required for various purposes, such as stovetops, ovens, and clothes dryers. As described in Section 4.7.4, CalEEMod was used to estimate natural gas consumption associated with Focused GPU implementation. Table 4.5-7 summarizes the estimated changes in natural gas consumption associated with the implementation of the Focused GPU (the Project).

Table 4.5-7: Estimated Focused GPU Natural Gas Consumption

	Natural Gas Consumption (therm)		
Metric	**2040 No Project**	**2040**	**2040 No Project to 2040 Housing Element Change**
Total Natural Gas Consumption	2,840,382	2,866,849	26,467
Population	11,410	12,802	1,392
Natural Gas Consumption Efficiency (therm/yr/capita)	249	224	-25

Source: MIG, 2023 (see Appendix C).

Based on the demand calculations shown in Table 4.5-7, modeled natural gas consumption in 2040 with the Focused GPU would be approximately 26,467 therms more than the natural gas consumption in 2040 without the Project due to increased population supported by the Project; however, this increase in natural gas use would occur in a more efficient manner due to the Town's Reach Code, which restricts natural gas use to stoves, ovens, and clothes dryers. This is evidenced by an approximate 25 therm/yr/capita decrease in natural gas consumption.

Natural gas consumption is a necessary step in moving towards a cleaner energy grid and meeting California's climate goals and is a necessary utility to support implementation of the Focused GPU. In addition, new development and land use turn over would be required to comply with statewide mandatory energy requirements outlined in Title 24, Part 6, of the California Code of Regulations (the CALGreen Code) and more stringer standards specified in the Town's Reach Code, which would further reduce the estimated natural gas consumption in retrofitted structures from current modeled conditions, further increasing the efficiently natural gas resources. Since the Town already implements a Reach Code that reduces natural gas consumption beyond existing statewide standards, the additional natural gas used for stovetops, ovens, and clothes drying is not considered wasteful, inefficient, or unnecessary from an energy impact perspective. For these reasons, this impact is considered less than significant.

It is noted that Mitigation Measures GHG-1a and GHG-1b, which would require Town-specific zero net energy (ZNE) efforts and prohibit natural gas in new development if a ZNE ordinance is not developed, could further reduce the less than significant magnitude of the Housing Element's natural gas consumption.

Diesel and Gasoline Fuel

Construction Use

Diesel and gasoline fuels, also referred to as petroleum in this subsection, would be consumed during construction activities as the Town grows under the Focused GPU. Fuel use by construction equipment would be the primary energy resource consumed during development activities, and VMT associated with the transportation of construction materials (e.g., deliveries) and worker trips would also result in petroleum consumption. Whereas on-site, heavy-duty construction equipment and delivery trucks would predominantly use diesel fuel, construction workers would generally rely on gasoline-powered vehicles to travel to and from construction sites. State regulations such as LCFS would reduce the carbon intensity of transportation-related fuels, and all construction projects would be required to comply with CARB's Airborne Toxic Control Measures, which restrict heavy-duty diesel vehicle idling to five minutes. Since petroleum use during construction would be temporary at each location and required to conduct development activities, it would not be unnecessary, wasteful, or inefficient.

Operational Use

The development of new housing sites would generate vehicle trips that would consume petroleum fuel over the next 20 years and beyond. The trips that consume fuel would primarily be attributable to people traveling to or from the Town. The amount of fuel these trips would consume was estimated using 2040 San Mateo County fleet inventory data from EMFAC2021 v1.0.2 and VMT estimates prepared for the Focused GPU (see Section 4.14, Transportation). The estimated diesel and gasoline fuel consumption associated with implementation of the Focused GPU (the Project) is summarized in Table 4.5-8**.**

Table 4.5-8: Estimated Project Vehicle Fuel Consumption

Metric	Vehicle Fuel Consumption Per Day (Gallons)		
	2040 No Project	2040 With Housing Element	2040 No Project to 2040 Housing Element Change
Total Diesel Consumption	898	1,005	107
Total Gasoline Consumption	8,486	9,501	1,015
Total Petroleum Consumption	9,384	10,506	1,122
Population	11,410	12,802	1,392

Table 4.5-8: Estimated Project Vehicle Fuel Consumption			
	Vehicle Fuel Consumption Per Day (Gallons)		
Metric	2040 No Project	2040 With Housing Element	2040 No Project to 2040 Housing Element Change
Petroleum Consumption Efficiency (gal/day/capita)(A)	0.82	0.82	0.00
Source: MIG, 2023 (see Appendix C).			

As shown in Table 4.5-8, daily diesel and gasoline fuel consumption in 2040 with the Focused GPU is anticipated to be approximately 1,005 gallons and 9,501 gallons, respectively. Compared to 2040 conditions without the Focused GPU, this represents an increase of approximately 107 gallons of diesel fuel and 1,015 gallons of gasoline consumed daily. Overall petroleum consumption per population is expected to decrease between 2020 and 2040, primarily due to increased fuel efficiency standards enacted at the state level, but would remain static between conditions in 2040 with and without the Focused GPU.

As identified in Section 4.2, Air Quality, Section 4.7, Greenhouse Gas Emissions, and Section 4.14, Transportation, the proposed Project would result in several impacts related to VMT. The Project would have the potential to conflict with the BAAQMD 2017 Clean Air Plan, ABAG/MTC Plan Bay Area 2050, and result in GHG emissions that are inconsistent with future state-wide GHG reduction goals. These impacts are directly attributable to VMT generated by petroleum-powered vehicles. Due to these impacts, and because petroleum is a non-renewable form of energy, the consumption associated with vehicle trips generated by housing units proposed by the Project are considered to be potentially significant. Accordingly, the Town would implement Mitigation Measures ENG-1a and ENG-1b, which align with Mitigation Measures GHG-1d and GHG-1e.

- Mitigation Measure ENG-1a would require future residential development facilitated by implementation of the Project to be constructed to comply with the most stringent voluntary standards as specified in the CalGreen Code established for EV charging infrastructure. This could increase the likelihood of residents in the Town purchasing and using ZEVs, since they would be able to charge the vehicles at home as opposed to an off-site location. This in turn would reduce petroleum consumption and increase the consumption of electricity, a more efficient and less wasteful form of energy.
- Mitigation Measure ENG-1b would require site specific evaluation of a project's VMT and require it to reduce VMT by 15% (and the energy consumption associated with it, including petroleum) below the countywide average residential VMT per capita. This is generally considered the maximum feasible mitigation that can be achieved in suburban contexts, according to *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity,* California Air Pollution Control Officers Association (CAPCOA), 2021 (CAPCOA report).

With the implementation of Mitigation Measure ENG-1a and ENG-1b, new development occurring under the Focused GPU would reduce operational petroleum consumption and shift

energy requirement to a more efficient form of energy (i.e., electricity). This impact would be ***less than significant with mitigation incorporated***.

Conclusion

As described above, the Project would result in greater energy consumption under proposed conditions than without it. Overall electricity energy consumption would increase, as would per capita electricity consumption, but this increase would be attributable to energy sources shifting from natural gas to electricity. Natural gas consumption, on average, would decrease under Project conditions due to the Town's Reach Code, which prohibits natural gas use for space and water heating. The use of gasoline and diesel fuels used for new vehicle trips, however, is considered an inefficient form of energy since it comes from non-renewable sources and is not otherwise being abated by existing Town policies, programs, and/or other requirements. Accordingly, the Town would implement Mitigation Measures ENG-1a and ENG-1b, which would require new development further prepare for a transition to electric vehicles. In addition, Mitigation Measure ENG-1b would require VMT reductions that would result in reduced consumption of petroleum by new residents. With the implementation of Mitigation Measures ENG-1a and ENG-1b, this impact would be ***less than significant with mitigation incorporated***.

Mitigation Measures

Impact ENG-1: The proposed Project would result in the use of gasoline and diesel fuels for new vehicle trips which is considered an inefficient form of energy.

Mitigation Measure ENG-1a: Residential Electric Vehicle Charging Requirements. Future residential development facilitated by the Project that includes new or additional parking facilities must conform with the Tier 2 electric vehicle charging requirements in the latest edition of the California Green Building Standards Code (CalGreen) in effect at the time that building permit applications are submitted to the Town. Currently, the 2022 CalGreen code, Section A4.106.8, Electric Vehicle Charging for New Construction, requires the following measures to facilitate the future installation and use of electric vehicle chargers:

- New one and two-family dwellings and townhouses with attached private garages include a dedicated 208/240-volt branch circuit rated at 40 amperes minimum.
- New multi-family dwellings provide 40 percent of the total number of parking spaces on a building site be electric vehicle charging spaces capable of supporting future electric vehicle supply equipment.

Mitigation Measure ENG-1b: VMT Reduction. Future residential development facilitated by the Project shall be required to achieve a VMT reduction of 15 percent below the countywide average residential VMT per capita. For individual development projects that do not achieve VMT significance thresholds, applicants shall submit documentation that demonstrates how the necessary VMT reductions will be achieved (see Mitigation Measure TRANS-1).

Impact ENG-2 – Conflict with or Obstruct a State or Local Plan for Renewable Energy or Energy Efficiency. *[Threshold of Significance (b)]*

The Focused GPU would not conflict with nor obstruct a state or local plan adopted for the purposes of increasing renewable energy or energy efficiency. The Title 24 Building Code contains energy efficiency standards for residential and non-residential buildings. These standards address electricity and natural gas efficiency in lighting, water, heating, and air conditioning, as well as the effects of the building envelope (e.g., windows, doors, walls and roofs, etc.) on energy consumption. The 2019 Title 24 Building Code required the installation of solar panels on new residential development under three stories. The latest update to these standards, codified in 2022, extends solar requirements and introduces battery storage requirements to additional building types, including high-rise multifamily buildings, office buildings, and retail buildings. The Town would enforce the 2022 Title 24 Building Code, as well as the Town's Reach Code contained in Chapter 5.10 of the Town's Code of Ordinances, which expand upon the 2022 Title 24 Building Code requirements, during design review and project approval processes. Other state plans, such as increasing the RPS portfolio, and increasing fuel efficiency and the number of electric vehicles on the road, would be implemented at the state level.

The Focused GPU would implement mitigation measures that would support renewable energy and energy efficiency, and further reduce a less than significant impact. Mitigation Measure GHG-1b would require the Town to consider the adoption of a ZNE ordinance and Mitigation Measures GHG-1d/ENG-1a would require the installation of EV parking infrastructure, which would assist the state in transiting to electric vehicles.

For the reasons listed above, the Focused GPU would comply with applicable State standards and would not conflict with, obstruct, or impede the implementation of any plan related to increasing renewable energy or energy efficiency. The Project would have a ***less-than-significant impact***.

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4.6 Geology and Soils

4.6.1 Environmental Setting

The Planning Area is located within the Coast Range geomorphic province that encompasses the San Francisco Bay region (Town of Hillsborough 2018). The Coast Range province features northwest trending mountain ranges, broad basins, and narrow valleys that roughly parallel major geologic structures and the coastline of central California. Flat lowland areas constitute the broad alluvial plain surrounding the Bay. In the Hillsborough area, Montara Mountain, the northernmost peak of the Santa Cruz Mountains, forms the spine of the San Francisco Peninsula. It rises to a maximum elevation of over 1900 feet above sea level. The Upper and Lower Crystal Springs Reservoirs are located in the valley just west of Interstate 280, which follows the main thread of the San Andreas Rift Zone. San Mateo Creek flows out of the Crystal Springs valley in a break between Buri Buri Ridge and Pulgas Ridge to the south toward its eventual discharge into San Francisco Bay.

The underlying bedrock on the east side of the San Andreas Fault where the Town is located consists of Franciscan Complex materials that include altered volcanics (greenstone and chert), Franciscan melange (sheared and metamorphic shale, siltstone and graywacke), and serpentinite (Town of Hillsborough 2018). The majority of the Town is underlain by disturbed soil, identified as urban land or orthents (i.e., soils which have been mechanically modified as a result of grading and fill associated with development, or other urban activities, such as landscaping) (Town of Hillsborough 2005). The rest is comprised of Fagan Loam, Los Gatos Loam, Maymen Gravelly Loam and Obispo Clay, all of which are on slopes of 15 percent or more. The Barnabe-Rock Outcrop Complex, Fagan Loam, Los Gatos Loam and Maymen Gravelly Loam have a high to very high potential for erosion, however, many of the areas with these soil types are protected within open space areas. The Obispo Clay has a lower potential for erosion.

The topography of Hillsborough is hilly and includes areas with steep slopes and ravines, with elevations ranging from approximately 20 to 30 feet MSL in the east (near El Camino Real) rising to approximately 600 to 700 feet MSL in the west (near I-280). The western portion of the Town contains steep, narrow canyons with localized drainages. The Town is drained in a northeasterly direction by several streams that ultimately discharge to San Francisco Bay. San Mateo Creek forms the boundary between Hillsborough and the City of San Mateo. Oak woodland occurs along drainage areas and in undeveloped areas of the Town, providing habitat to several sensitive species of plants and animals.

Faulting and Seismicity

Hillsborough is located within the seismically active San Francisco Bay region, one of the most seismically active zones in the United States (Town of Hillsborough 2005). The faults in the region are capable of generating earthquakes of at least 8.0 in magnitude on the Richter Scale, producing very strong ground shaking in Hillsborough. The closest fault line to Hillsborough is the San Andreas Fault, which runs along the western boundary of the Town. There are no fault lines identified within the Town limits and the Town is not within an Alquist-Priolo designated zone (see Figure 4.6-1).

The Planning Area will experience strong seismic ground shaking and related effects in the event of an earthquake on any one of the active faults in the San Francisco Bay region (e.g., San Andreas, Hayward, Calaveras, San Gregorio), but the strongest shaking potential would be from the San Andreas (Town of Hillsborough 2018). The predicted maximum (Richter Scale) earthquake magnitude on the San Andreas fault is 7.9 - 8.0, while the maximum ranges from 7.2 to 7.5 on the Hayward-Rogers Creek and the San Gregorio faults.

In 2014, the Working Group on California Earthquake Probabilities (WGCEP) predicted a 72 percent chance of a magnitude 6.7 or greater earthquake occurring in the San Francisco Bay Area within the next 30 years (WGCEP 2014).

Landslides

Landslides are downward and outward movements of slope-forming materials such as rock, soil and/or artificial fill. The general characteristics that influence landslide hazards include slope material, slope steepness, water content, vegetation coverage and proximity to areas of erosion or man-made cuts.

Hillsborough is hilly, with areas of steep slopes, especially along its creeks and canyons (Town of Hillsborough 2005). The steeper slopes have the potential for erosion and slippage. The Town continually monitors historical landslide areas. Figure 4.6-2 shows landslide susceptibility in the Planning Area.

Because of the excess of steep terrain in the Planning Area, the Town currently allows limited new development to occur on some of the steeper slopes (Town of Hillsborough 2005). To address the concern of potential slope failure, the Town requires development to meet current engineering standards. In addition, the Town has an ordinance (Hillsborough Municipal Code Title 16 - Subdivisions) requiring any new subdivisions on average slopes over 10 percent to provide larger lots, thereby reducing the concentration of homes on steeper slopes.

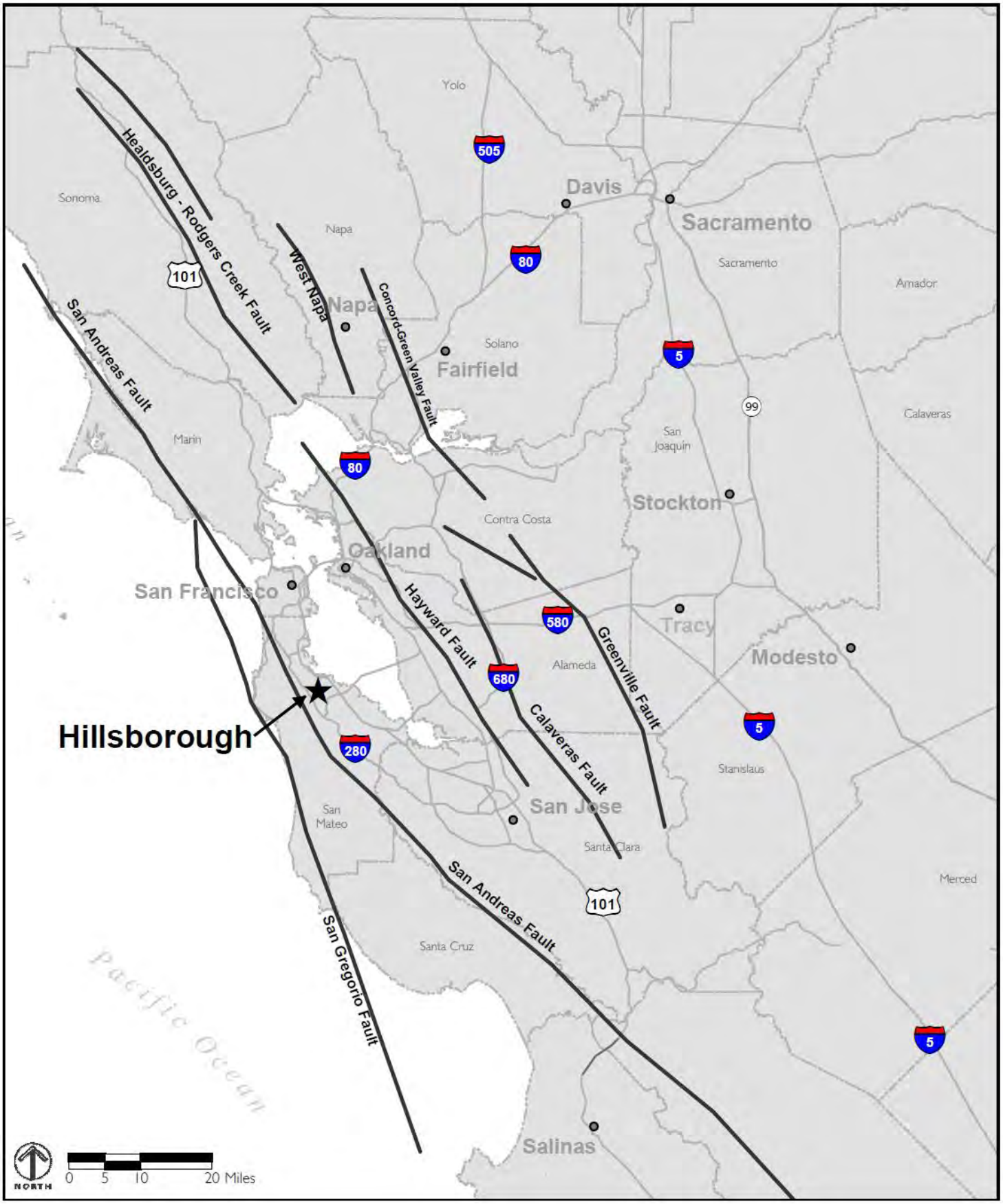
Liquefaction

Liquefaction occurs when loose, saturated sandy soils lose strength and flow like a liquid during earthquake shaking. Ground settlement often accompanies liquefaction. Soils most susceptible to liquefaction are saturated, loose, silty sands, and uniformly graded sands.

Liquefaction is a serious hazard because buildings in areas that experience liquefaction may sink or suffer major structural damage. Liquefaction is most often triggered by seismic shaking, but can also be due to improper grading, landslides, or other factors. Generally, liquefaction potential within the Planning Area is low. Figure 4.6-3 shows the locations susceptible to liquefaction within the Planning Area.

Lateral Spreading

Lateral spreading involves lateral ground movements caused by seismic shaking. These lateral ground movements are often associated with a weakening or failure of an embankment or soil mass overlying a continuous layer of liquefied sand or weak soils. Lateral spreading is generally the most pervasive and damaging type of liquefaction-induced ground failure generated by earthquakes.



Source: Town of Hillsborough

Figure 4.6-1 Regional Faults

Expansive Soils

Expansive soils contain higher levels of clay which expand and shrink depending on water content. Consequently, expansive soils present hazards for structures that were not appropriately engineered. Expansive soils can be found in the Planning Area in locations with Francisco clay mélange soils and other expansive bedrock soil types.

Subsidence

Subsidence is the gradual or sudden sinking of an area of land due to removal or displacement of subsurface earth materials. Subsidence in California is caused by lowered groundwater tables due to groundwater pumping or prolonged drought, drainage, compression of organic soils or mud, underground mining, and natural compaction or collapse. The effects of subsidence include damage to buildings and infrastructure. Subsidence is a secondary effects of earthquake hazards in Hillsborough along with earthquake induced land sliding, liquefaction, tsunami, and seiche. Owing to the absence of near-surface groundwater in the Town, subsidence is not a potential Project hazard (Town of Hillsborough 2018).

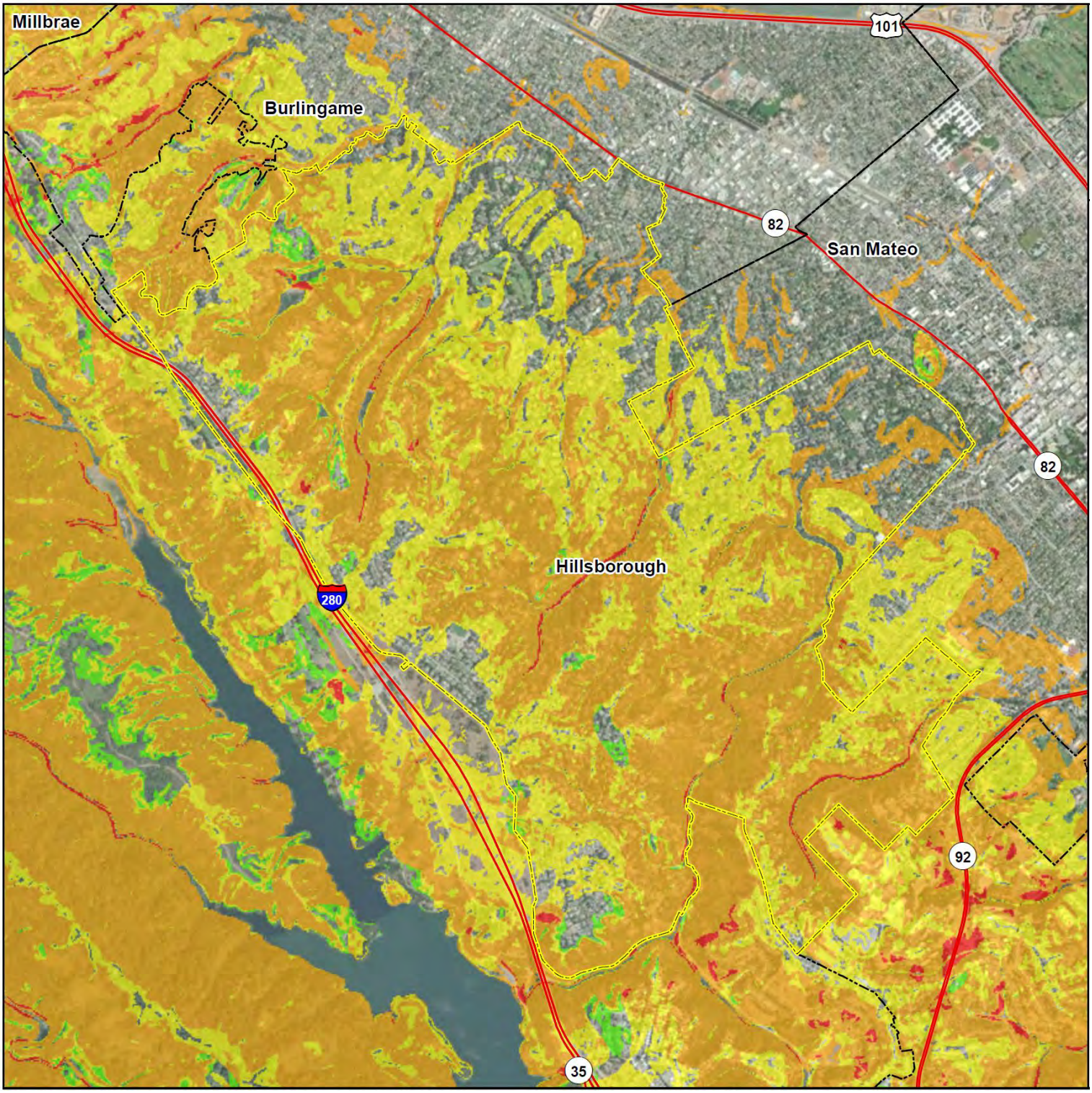
Soil Erosion

Erosion is a natural process that occurs over time and can be caused by either wind or water moving over soil. The natural erosion process is an important factor in building up fertile valley soils. However, soil erosion can become a problem when human activities accelerate the rate at which soil is being displaced. Non-point sources including impervious surfaces, construction activities and road construction (particularly unpaved roads), and unvegetated areas can all accelerate the rate at which soils are removed from hillsides. Soil erosion can leave silt-choked streams and gullied hillsides.

Erosion is a concern in the Planning Area, especially during initial grading stages of future development that may occur under the proposed Project. The Barnabe-Rock Outcrop Complex, Fagan Loam, Los Gatos Loam and Maymen Gravelly Loam have a high to very high potential for erosion, however, many of the areas with these soils types are protected within open space areas. The Obispo Clay has a lower potential for erosion.

Paleontological Resources

Paleontology is a branch of geology that studies the life forms of the past, especially prehistoric life forms, through the study of plant and animal fossils. Paleontological resources represent a limited, non-renewable, and impact-sensitive scientific and educational resource. As defined in this section, paleontological resources are the fossilized remains or traces of multi-cellular invertebrate and vertebrate animals and multi-cellular plants, including their imprints, from a previous geologic period.



Source: San Mateo County Multijurisdictional Local Hazard Mitigation Plan.

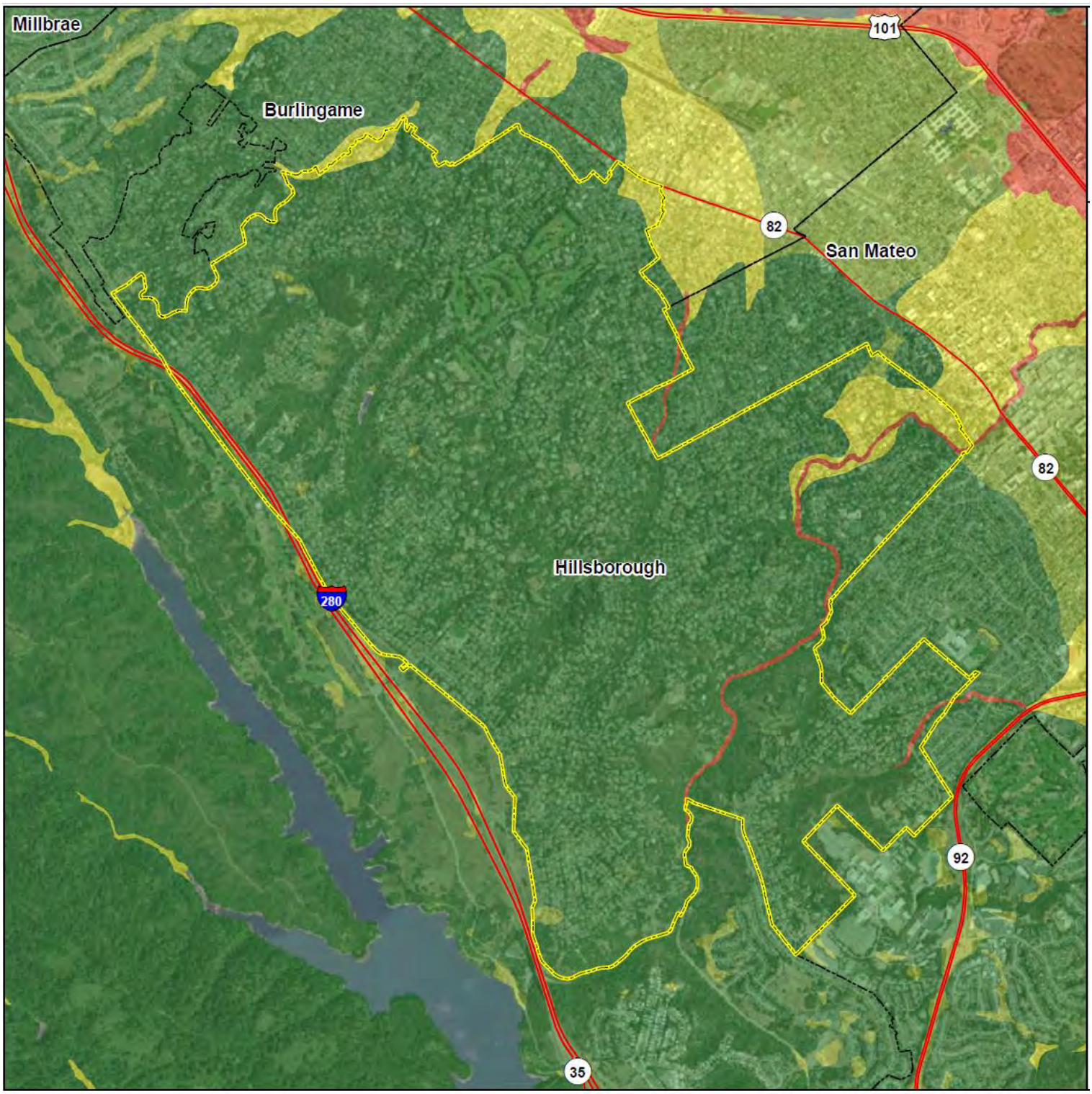
Legend

- Low
- Moderate
- High
- Very High
- Hillsborough Town Limits
- Highway
- Incorporated Cities

0 0.2 0.4 0.8 Miles

N

Figure 4.6-2 Landslide Hazard Areas



Source: San Mateo County Multijurisdictional Local Hazard Mitigation Plan.

Legend

- Very Low
- Low
- Moderate
- High
- Very High .20
- Hillsborough Town Limits
- Incorporated Cities
- Highway

0 0.2 0.4 0.8 Miles

N

Figure 4.6-3 Liquefaction Potential

Paleontological resources consist of the fossilized remains of plants and animals, including vertebrates (animals with backbones) and invertebrates (e.g., starfish, clams, ammonites, and marine coral). Paleontological resources include not only the actual fossil remains, but also the collecting localities, and the geologic formations containing those localities. The age and abundance of fossils depends on the topography and geological formations of the region of interest. In general, most fossils in the Peninsula and San Francisco Regions are found along the immediate Pacific Ocean coastline, and in locations within the outcropping marine units in the Santa Cruz Mountains. Geologic units underlying the Planning Area are primarily composed of Holocene period alluvial fan deposits and Holocene period San Francisco Bay Muds. The Holocene Period dates from approximately 10,000 to 12,000 years prior to the present and is the era in which human civilization is generally considered to have begun.

4.6.2 Regulatory Setting

Federal

National Earthquake Hazards Reduction Program

Established by Congress in 1977, the National Earthquake Hazards Reduction Program (NEHRP) leads the federal government's efforts to reduce the fatalities, injuries, and property losses caused by earthquakes. The four basic NEHRP goals are:

- Develop effective practices and policies for earthquake loss reduction and accelerate their implementation.
- Improve techniques for reducing earthquake vulnerabilities of facilities and systems.
- Improve earthquake hazards identification and risk assessment methods, and their use.
- Improve the understanding of earthquakes and their effects.

In its initial NEHRP authorization, and in subsequent reauthorizations, Congress has recognized that several key federal agencies can contribute to earthquake mitigation efforts.

Federal Disaster Mitigation Act of 2000

The Disaster Mitigation Act of 2000 authorizes the Federal Emergency Management Agency (FEMA) to set mitigation planning requirements for state, local, and Indian Tribal governments as a condition of mitigation grant and disaster assistance, and requires close coordination of mitigation planning and implementation efforts between FEMA and jurisdictions.

Code of Federal Regulations (CFR) Title 43 CFR 8365.1-5

This regulation addresses the collection of invertebrate fossils and fossil plants, including the willful disturbance, removal, and destruction of scientific resources or natural objects.

State

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the potential hazard of surface faults to structures for human occupancy. The main purpose of the Act is to

prevent the construction of human-occupied buildings built above active faults. The Act only addresses the hazard of fault rupture and is not directed toward other earthquake hazards.

The Alquist-Priolo Earthquake Fault Zoning Act regulates development in California near known active faults due to hazards associated with surface fault ruptures. The Act requires the State Geologist to establish regulatory zones (known as Earthquake Fault Zones) around the surface traces of active faults and to issue maps to all affected cities, counties, and State agencies for their use in planning and controlling development. Local agencies must regulate most development projects within the zones, and generally there can be no construction for human occupancy within 50 feet of an active fault zone.

Seismic Hazard Mapping Act

The Seismic Hazard Mapping Act was passed in 1990 following the Loma Prieta earthquake to reduce threats to public health and safety and to minimize property damage caused by earthquakes. The act directs the U.S. Department of Conservation to identify and map areas prone to the earthquake hazards of liquefaction, earthquake-induced landslides, and amplified ground shaking. The act requires site-specific geotechnical investigations to identify potential seismic hazards and formulate mitigation measures prior to permitting most developments designed for human occupancy within the Zones of Required Investigation.

Section 2697(a) of the Act states that “cities and counties shall require, prior to the approval of a project located in a seismic hazard zone, a geotechnical report defining and delineating any seismic hazard.” Two exceptions to this are allowed related to certain single-family residential dwellings, and alterations or additions to any structure within a seismic hazard zone that do not exceed 50 percent of the structure’s value or 50 percent of the floor area of the existing structure (Section 2693).

Natural Hazards Disclosure Act

The Natural Hazards Disclosure Act requires that sellers of real property and their agents provide prospective buyers with a "Natural Hazard Disclosure Statement" when the property being sold lies within one or more State-mapped hazard areas.

California Building Standards Code

The California Building Standards Code (CBSC) is contained in the California Code of Regulations (CCR), Title 24, and includes requirements for residential construction (California Residential Code) and non-residential construction (California Building Code), plumbing and electrical standards (California Plumbing Code and California Electrical Code, respectively), and related regulations. The purpose of the CBSC is to establish minimum standards to safeguard the public health, safety, and general welfare through structural strength, means of egress facilities, and general stability, by controlling the design, construction, quality of materials, use and occupancy, location, and maintenance of building and structures. The CBSC contains specific requirements for seismic safety, excavation, foundations, retaining walls, and site demolition. It also regulates grading activities, including drainage and erosion control. The 2022 California Building Standards Code (Cal. Code Regs., Title 24) was published July 1, 2022, with

an effective date of January 1, 2023. The 2022 California Building Code is based on the 2021 International Building Code published by the International Code Council.

California Public Resources Code

Section 5097 of the Public Resources Code specifies the procedures to be followed in the event of the unexpected discovery of historic, archaeological, and paleontological resources, including human remains, historic or prehistoric resources, paleontological resources on nonfederal land. The disposition of Native American burials falls within the jurisdiction of the California Native American Heritage Commission (NAHC). Section 5097.5 of the Code states the following:

No person shall knowingly and willfully excavate upon, or remove, destroy, injure or deface any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands. Violation of this section is a misdemeanor.

General Plan Law (California Government Code §65302(g)(1))

Government Code §65302(g)(1) requires safety elements to address the protection of the community from any unreasonable risks associated with the effects of seismically induced surface rupture, ground shaking, ground failure, tsunami, seiche, and dam failure; slope instability leading to mudslides and landslides; subsidence; liquefaction; other seismic hazards; and other geologic hazards known to the legislative body; flooding; and wildland and urban fires. The safety element shall include mapping of known seismic and other geologic hazards. It shall also address evacuation routes, military installations, peak load water supply requirements, and minimum road widths and clearances around structures, as those items relate to identified fire and geologic hazards.

New State law, including Senate Bill (SB) 379 and SB 1035 requires safety elements to address climate adaptation and resiliency planning, as well as new information relating to flood and fire hazards. SB 379 is the foundation for adaptation and resiliency in general plan safety elements—it requires local governments to conduct vulnerability assessments as part of their long-range public safety planning efforts and prepare policies that will protect against harm caused by climate change. SB1035 builds on earlier legislation and requires local governments to review and update their safety elements if needed during an update to their housing element or local hazard mitigation plan, or at least once every eight years. Any revisions should include updated information related to flood hazards, fire hazards, and climate adaptation and resilience. In 2018, California Senate Bill (SB) 1035 revised California Government Code § 65302(g) to require General Plan Safety Elements to address climate adaptation and resiliency. After 2022, the Safety Element is to be updated upon each revision of the housing element or local hazard mitigation plan (LHMP), but no less than once every eight years to address new information or changing conditions.

Regional/Local

San Mateo County Multi-Jurisdictional Local Hazard Mitigation Plan

The San Mateo County Department of Emergency Management is responsible for alerting and notifying appropriate agencies within the county's 20 cities when disaster strikes; coordinating all agencies that respond, ensuring resources are available and mobilized in times of disaster, developing plans and procedures in response to and recovery from disasters, and developing and providing preparedness materials for residents. In 2021, the San Mateo County Department of Emergency Management published a Multi-Jurisdictional Local Hazard Mitigation Plan, a large regional and cross-jurisdictional effort to plan for the reduction of risk from natural and other disasters.

The 2021 LHMP assesses hazard vulnerabilities and identifies mitigation actions that jurisdictions will pursue in order to reduce the level of injury, property damage, and community disruption that might otherwise result from such events. The LHMP addresses natural and human-caused hazards, including earthquake, landslides, dam failure, flooding, drought, wildfire, severe weather, terrorism, cyber threats, pandemic, and the impact of climate change on hazards, as well as other hazards.

Adoption of the Plan ensures the County and partner agencies remain eligible for various types of pre- and post-disaster community assistance, such as grants, from FEMA and the State government.

The Town of Hillsborough is a planning partner with San Mateo County and has assumed responsibility for adopting the recommendations of the plan and committing resources toward implementation of the action plan specific to Hillsborough.

Town of Hillsborough General Plan

The Public Safety Element of the Town's General Plan contains goals, policies, and actions for the protection of the community from geologic and seismic hazards. Relevant goals, policies and actions include (Hillsborough 2005):

Goal PS-2 - Reduce risk of landslide and slope failure during and after heavy rains and earthquakes, and protect the community from hazards associated with soil erosion, weak and expansive soils and slope instability.

> *Policy PS-2.1* - Minimize development in areas of natural hazards, such as landslides and floodplains, which have the potential to jeopardize the public health and safety.
>
> Policy PS-2.2 - Reduce the risk of impacts from geologic and seismic hazards by applying proper development engineering, building construction, and retrofitting requirements.
>
> *Policy PS-2.3* - Review new building plans for proper foundation and supports in areas with slope gradients greater than 10 percent. Require property owners to provide minimal slope stabilization in properties high at risk to earthquake-induced slope failure.

Policy PS-2.4 - Properties in hazardous slope areas where slope improvements have been made should be inspected periodically.

Policy PS-2.5 - Review drainage plans for new development to determine areas susceptible to poor drainage and compare with areas susceptible to slope failure.

Policy PS-2.6 - Reduce risk to drivers from landslides onto public roads.

Action PS-2.1 - The Town will continue to implement its Hillside Lot Size Ordinance that limits the density of development on slopes over 10 percent to reduce the risk of slope failure and to reduce runoff and erosion. Implementation of the Ordinance also helps to protect open space features and riparian habitat by minimizing development along streambeds.

Action PS-2.2 - The Town will continue to require construction plans for all new houses be reviewed by a State of California-registered professional engineer.

Goal PS-3 - Reduce the risk of injury and structure damage from exposure to seismic activity.

Policy PS-3.1 - Ensure new building plans in high risk areas meet current seismic building codes and use methods of construction to withstand stress caused by an earthquake.

Action PS-3.1 - The Town will review all new building plans or substantial renovations for compliance with the UBC and any additional State or federal seismic safety regulations prior to permit approval.

Action PS-3.2 - The Town will continue to inspect all required seismic upgrades or new construction to ensure adequate compliance.

Action PS-3.3 - The Town will distribute information to residents on emergency procedures in case of an earthquake.

The following action from the Open Space and Conservation Element of the Town's General Plan is relevant to the protection of paleontological resources:

Action OSC-5.3 - The Town will require construction projects to stop if archaeological or paleontological resources are uncovered during grading or other on-site excavation activities. Once the resources are assessed for importance, appropriate mitigation compliant with State law will be determined.

Town of Hillsborough Municipal Code

The Town of Hillsborough Municipal Code contains the following sections, which may be applicable to the proposed Project:

Chapter 15.24 - Grading

15.24.040 - Permit—Application and fees.

A. Application for all grading permits shall be filed with the city engineer on the form provided by the town and shall include the following information:

   1. Name, address and signature of the applicant;

   2. Name, address and phone number of the contractor; name and phone number of the twenty-four-hour emergency contact (contractor's representative);

   3. Purpose for which the grading permit is requested;

   4. A complete map of the property (showing all property lines) on which the grading is proposed to be done (which may, at the applicant's discretion, be incorporated into the grading plan described in subsection (5));

   5. A grading plan prepared by a registered civil engineer, showing the existing and proposed topography with the proposed cuts and fills and giving elevations, cross sections and/or profiles of the work in accordance with standard practice and to the satisfaction of the city engineer. The grading plan shall contain a certificate to be executed by the soils engineer or geologist that the grading plan incorporates the recommendations and conclusions of the soils report prepared according to Section 16.24.010 (C);

   6. Erosion sediment control plan;

   7. Schedule of proposed activities, including, but not limited to, the time within which the grading is to be commenced after the granting of the grading permit and time when the grading is to be completed;

   8. The manner in which the material is to be removed from the site and the proposed route over the public streets and over private property in transporting any material;

   9. Security in a form and amount satisfactory to the city engineer as necessary to safeguard the public health and safety from any adverse effects of the grading;

   10. Certificate of insurance indicating compliance with Section 15.24.050;

   11. At the discretion of the city engineer, a geotechnical report, if one has not already been submitted with the building permit application;

   12. Such further information as the city engineer may require.

B. For Category 3 grading, the applicant shall also comply with the applicable requirements of the California Environmental Quality Act (CEQA).

C. At the time of filing the grading permit application, the applicant shall pay a grading plan review fee to cover the town's costs of processing the application and at the time the grading permit

is to be issued, the applicant shall pay a grading permit fee to cover the town's costs of monitoring the grading operation. The grading plan review fee and grading permit fee shall be in amounts as set by the city council from time to time by resolution.

D. If the applicant wishes to be excused from any requirement of this chapter, the applicant shall follow the procedure set forth in Chapter 1.24 Exceptions From Requirements.

15.24.080 Permit – Conditions of Issuance

Any grading permit issued pursuant to this chapter is issued subject to the conditions set forth in this section. Failure to comply with these conditions shall be grounds for suspension or revocation of the grading permit as described in Section 15.24.100.

A. All vehicles transporting material over the public streets of the town shall comply with state and local weight limits and shall travel directly over the route(s) approved by the city engineer or city council, as the case may be, and no where else.

B. Grading shall be done in accordance with the approved plans and the geotechnical report, if any, and with the conditions set forth in this section and on the grading permit.

C. All grading for which the city engineer has required a geotechnical investigation shall be supervised, during the placement and compaction period, by an engineer licensed and qualified on the subject of soil mechanics. The geotechnical engineer shall certify such grading work upon completion of the job, and the permittee shall provide such certification to the city engineer.

D. Cut or fill slopes shall be treated as required by the city engineer to prevent erosion. The jobsite shall comply with all federal, state, county and town requirements for prevention of discharges into the stormwater system.

E. No dust, mud, excess earth or debris in the area affected by the jobsite shall at any time be allowed to become a nuisance or danger.

F. Any material spilled or deposited on any public street or place from any vehicle or conveyor transporting material shall be immediately removed in a manner satisfactory to the city engineer and at the expense of the permittee.

G. The hours of work for grading or related work shall be Monday through Friday between the hours of eight a.m. and five p.m. and Saturday between the hours of ten a.m. and five p.m., excluding any day when the office of the Hillsborough city clerk is closed for observance of a holiday. If there is any inconsistency between the hours of work provisions of Chapter 8.32 and those of this subsection (G), the latter shall control. Nothing in this subsection shall be deemed to override or contradict the noise level provisions of Chapter 8.32, however.

H. Any other conditions imposed by the city engineer in the city engineer's discretion as he or she deems necessary or advisable for the protection of the public health, safety and welfare.

15.24.120 – Compliance with NPDES Permit

All activities undertaken pursuant to this chapter shall comply with the current NPDES (National Pollutant Discharge Elimination System) permit under which the town operates (the terms of which permit are incorporated herein by reference) and with any amendment, revision, or reissuance thereof. The current NPDES permit is on file in the office of the city clerk.

4.6.3 Thresholds of Significance

Potential impacts to geology and soils were determined in accordance with Appendix G of the CEQA Guidelines. Impacts would be considered potentially significant if the proposed Project will:

A. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

    1. 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;

    2. Strong seismic ground shaking;

    3. Seismic-related ground failure, including liquefaction; or

    4. 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; or

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 geological feature.

4.6.4 Impacts and Mitigation Measures

The proposed Project consists of updates to the existing 2014 - 2022 Housing Element to reflect the 6th cycle 2023 – 2031 housing assignments; associated amendments to the Land Use Element and General Plan Land Use Map, Open Space and Conservation Element, and Public Safety Element; amendments to Title 17 (Zoning) of the Hillsborough Municipal Code, and amendments to the Hillsborough Zoning Map. These amendments are generally described in

sections 3.3.9 through 3.3.12 in Project Description. The proposed amendments described in the Project Description would not result in environmental impacts to geology and soils and are therefore not discussed further in this chapter. The impact analysis focuses on the residential development that would be facilitated by the Draft 2023 – 2031 Housing Element.

Impact GEO-1 – Effects of Rupture of a Known Earthquake Fault and Strong Seismic Ground Shaking. *[Thresholds of Significance (a)(i) and (a)(ii)]*

Due to the Town's location and physical conditions, future development in the Planning Area would be subject to geologic and seismic constraints, which may represent a potentially significant impact on future structures. The most serious constraints would be related to the Town's proximity to major earthquake faults and the steeply sloping terrain in the western portion of the Town. Strong groundshaking could be expected to occur in the western portion of the Town, closer to the active San Andreas fault system, which is located approximately 0.35 miles west of Town at the nearest point. Housing Opportunity Sites are distributed throughout the Town. Figure 3.3-3: Housing Opportunity Sites – Approaches 2-5in Project Description shows the locations of housing sites proposed under Approaches 2 through 5. Approach 1 ADUs could be developed on any residential parcel in Town, barring parcels where existing Municipal Code requirements could not mitigate geologic and seismic hazards to California Building Code (CBC) standards, and are therefore not reflected in Figure 3.3-3. New housing construction facilitated by the proposed Project would be subject to strong ground shaking during a seismic event.

As shown in Figure 4.6-3: Liquefaction Potential, the liquefaction risk increases from Very Low in the western and central portions of the Town to Moderate in several residential neighborhoods in the eastern portion of the Town approaching El Camino Real and surrounding San Mateo Creek and Borel Creek. The liquefaction susceptibility level is rated Very High for some of the narrow creek corridors in the eastern portion of the Town. Because most of the Town is mapped as having Very Low liquefaction susceptibility potential, the majority of increased residential density resulting from the Project, including the Subdivision/Lot Split Opportunity Sites, Multi-Family Opportunity Sites, Vacant Housing Opportunity Sites, and accessory dwelling units (ADUs), would be expected in areas with Very Low liquefaction susceptibility rating. Some housing opportunity sites may be located in or adjacent to Moderate liquefaction susceptibility areas or Very High liquefaction susceptibility areas if the site is located within or adjacent to a creek corridor. The Town Hall Multi-Family Opportunity Site, for example, may be located in or adjacent to a Moderate liquefaction susceptibility area.

Future residential development facilitated by the Project would be subject to existing General Plan Public Safety Element goals, policies, and actions related to seismic safety. Relevant General Plan policies and actions include:

Goal PS-2 - Reduce risk of landslide and slope failure during and after heavy rains and earthquakes, and protect the community from hazards associated with soil erosion, weak and expansive soils and slope instability.

> *Policy PS-2.1* - Minimize development in areas of natural hazards, such as landslides and floodplains, which have the potential to jeopardize the public health and safety.

Policy PS-2.2 - Reduce the risk of impacts from geologic and seismic hazards by applying proper development engineering, building construction and retrofitting requirements.

Policy PS-2.3 - Review new building plans for proper foundation and supports in areas with slope gradients greater than 10 percent. Require property owners to provide minimal slope stabilization in properties high at risk to earthquake-induced slope failure.

Policy PS-2.4 - Properties in hazardous slope areas where slope improvements have been made should be inspected periodically.

Policy PS-2.5 - Review drainage plans for new development to determine areas susceptible to poor drainage and compare with areas susceptible to slope failure.

Policy PS-2.6 - Reduce risk to drivers from landslides onto public roads.

Action PS-2.1 - The Town will continue to implement its Hillside Lot Size Ordinance that limits the density of development on slopes over 10 percent to reduce the risk of slope failure and to reduce runoff and erosion. Implementation of the Ordinance also helps to protect open space features and riparian habitat by minimizing development along streambeds.

Action PS-2.2 - The Town will continue to require construction plans for all new houses be reviewed by a State of California-registered professional engineer.

Goal PS-3 - Reduce the risk of injury and structure damage from exposure to seismic activity.

Policy PS-3.1 - Ensure new building plans in high risk areas meet current seismic building codes and use methods of construction to withstand stress caused by an earthquake.

Action PS-3.1 - The Town will review all new building plans or substantial renovations for compliance with the UBC and any additional State or federal seismic safety regulations prior to permit approval.

Action PS-3.2 - The Town will continue to inspect all required seismic upgrades or new construction to ensure adequate compliance.

Action PS-3.3 - The Town will distribute information to residents on emergency procedures in case of an earthquake.

In addition to the General Plan Public Safety Element, the Town's Municipal Code incorporates the CBC, which has guidelines on building design and construction based on seismic constraints and expected groundshaking throughout California. The Town's existing Municipal Code requirements would prevent an ADU from being developed in a geologic hazard area where the hazard could not be mitigated to CBC standards.

Site-specific geotechnical analyses for future residential construction will be required to accurately assess potential seismic and geologic hazards at any specific project location. In addition, stringent Town grading and building codes and landscaping requirements to minimize erosion and stormwater runoff (Hillsborough Municipal Code Chapter 17.56 – Landscaping) are

in place to address landslide potential, and soils studies and remediation measures for any problems are required prior to the issuance of grading and building permits.

With implementation of the existing Public Safety Element goals, policies, and actions, CBC requirements, and Town grading and building permit requirements, potential impacts related to geologic and seismic constraints on future development within the Planning Area would be ***less than significant.***

Impact GEO-2 – Potential Soil Erosion and Loss of Topsoil. *[Threshold of Significance (b)]*

The western and central portions of the Town contain steep slopes that would be subject to erosion. Creek banks within the Town would also be subject to erosion. The flatter portions of the Town are also subject to erosion by wind and water where native soils are left exposed during periods of high wind or strong storms. Local soils may be subject to erosion or loss of topsoil as future development facilitated by implementation of the proposed Project occurs on vacant land or where re development occurs.

The Town's existing General Plan Public Safety Element contains policies and actions related to erosion, including Policy PS-2.2, which requires application of proper development engineering, building construction, and retrofitting requirements to reduce geologic and seismic hazards, Policy PS-2.3, which requires Town review of new building plans for proper foundation and supports in areas with slope gradients greater than 10 percent and requires property owners to provide minimal slope stabilization on properties at risk of slope failure, Policy PS-2.4, which requires regular inspection of slope improvements in hazardous slope areas, and Policy PS-2.5, which states, "review drainage plans for new development to determine areas susceptible to poor drainage and compare with areas susceptible to slope failure." Additionally, Action PS-2.1 requires continued implementation of the Town's Hillside Lot Size Ordinance which limits the density of development on steep slopes to reduce slope failure risk, runoff, and erosion.

In addition to these policies and actions, future development projects must comply with the regulatory permitting requirements of multiple regional and state agencies. For example, development sites that disturb one or more acres of land or that are less than one acre but are part of a larger common plan of development require permit coverage and must comply with the statewide Construction General Permit,[26] which requires that project proponents prepare site drawings and maps, a Stormwater Pollution Prevention Plan for short-term construction-related water quality impacts, applicable post-construction plans, and file of a Notice of Intent with the State Water Resources Control Board SWRCB (see Chapter 4.9 Hydrology and Water Quality). Project proponents must also comply with the Town's grading permit requirements (contained within Chapter 15.24 – Grading), which include the preparation of a grading plan and an erosion sediment control plan to control soil erosion and sedimentation impacts during the construction phases of new or redevelopment projects.

With implementation of existing General Plan policies and actions, water quality regulatory permitting requirements, Town grading permit and Municipal Code grading requirements,

[26] Projects are not considered part of a larger common plan of development if separated by ¼ mile or more.

potential impacts related to erosion from future development within the Planning Area would be ***less than significant.***

Impact GEO-3 – Potential Ground Instability Impacts. *[Thresholds of Significance (a)(iii), (a)(iv), (c)(d)]*

As previously indicated, the Planning Area contains steep topography, primarily in the western and central portions of the Town. These areas are mapped as having Moderate to Very High susceptibility to deep-seated landslide susceptibility, according to the San Mateo County Multijurisdictional Local Hazard Mitigation Plan. It is possible that future events, including earthquakes and severe storms, could trigger landslides in these areas. Future residential growth anticipated by the Project, including the Vacant Housing Opportunity Sites, the Nueva School Opportunity Site, the Tobin Clark Opportunity Site, the Burlingame Country Club Opportunity Site (partial), the Subdivision/Lot Split Opportunity Sites, is expected to occur in portions of the Town that have Moderate, High, or Very High deep-seated landslide susceptibility. The ADU Opportunity Sites may also be located in Moderate, High, or Very High deep-seated landslide areas as many residential parcels in the Town are mapped as such.

The Project includes goals, policies, and actions to promote the maintenance of existing housing and increase capacity for additional housing options. The Project proposes to update Title 16 of the Hillsborough Municipal Code (Subdivisions) to modify existing subdivision standards with the intent of reducing minimum lot size and street frontage requirements to permit creation of additional subdivision opportunities through the community through the proposed Action 1.1(b). Action 1.1(b) as proposed in the Draft 2023 – 2031 Housing Element reads as follows:

> "Action 1.1 (b): Complete a study to determine if modifications to chapter 16 of the Hillsborough Municipal Code (Subdivisions) would facilitate the subdivision and development of additional housing in a manner that protects public safety. If the study indicates that the change would likely result in increased development and have minimal impact to public safety, the Town will modify existing subdivision standards pertaining to average slope and minimum lot size." (Draft Hillsborough Housing Element Housing Plan, p. 198)

Currently, Municipal Code Chapter 16.08 (Minimum Lot Size and Frontage) sets the minimum required lot size for any lot in the Town: "twenty-one thousand seven hundred eighty square feet, i.e., one-half acre." Municipal Code Chapter 16.12 (Hillside Lot Size) contains average percent slope requirements for subdivisions of land in hillside areas with an average slope of ten percent or greater. The intent of Chapter 16.12 of the Municipal Code includes, "to minimize water run-off and soil erosion problems incurred in adjustment of the terrain in order to meet on-site and off-site development needs."

Adoption of the Focused GPU and implementation of Action 1.1 (b) would modify Municipal Code Title 16 to facilitate an increase in housing development, including the housing development anticipated under the Draft 2023 – 2031 Housing Element and potential future housing development outside of that considered in the Draft 2023 – 2031 Housing Element. The Project Subdivision Opportunity Sites include the Strawberry Hill, 50 Brooke Court, and Hayne Sites. The Strawberry Hill Subdivision Site (2260 Redington Road) would have a potential

subdivision yield of 35 single-family residential lots. The Hayne Subdivision Opportunity Site (Hayne Road) would have a potential subdivision yield of five single-family residential lots. The Hayne Subdivision Opportunity Site is constrained by steep slopes. Implementing Action 1.1 (b) could potentially increase geologic hazards to future housing development by allowing more development on steeper slopes.

Municipal Code Title 16 currently requires developers of potential subdivisions to prepare a soils report for the subdivision site overall, and Municipal Code Chapter 15.24 (Grading) currently requires a site-specific geotechnical report/investigation for new grading and development at the discretion of the city engineer. The Town's implementation of Action 1.1 (b) is dependent upon the findings of a required study into whether Title 16 average slope and minimum lot size amendments would result in subdivision and development of additional housing in a manner that protects public safety/has a minimal impact to public safety. The Town anticipates completion of a feasibility analysis of modifications to the hillside development standards by March 2024 and potential modification of hillside development standards in June 2024 (Liz Ruess, personal communication).

As described in Section 4.6.2, California Government Code §65302(g) was amended in 2018 via SB 1035 to require Safety Elements to address climate adaptation and resiliency planning as well as incorporate new information or changing conditions related to flooding, sea level rise, wildfire hazards, and resiliency planning upon each revision of the Housing Element or LHMP after 2022. The Town of Hillsborough is not currently updating its Public Safety Element as part of this Focused GPU. As such, the Town has not yet completed Public Safety Element or Municipal Code updates (if necessary) to respond to this recent State law.

Acknowledged in Government Code §65302(g) is the potential for secondary climate change impacts, such as wildfire and extreme precipitation and storm events, to exacerbate the risks of post-wildfire or post-storm slope instability, resulting in landslides and debris flows. The intensification of development on hillsides, most of which are located in wildfire hazard areas (see Chapter 4.16 Wildfire), in the Planning Area is a condition that was not evaluated by the Town when the current hillside subdivision minimum lot size and average slope requirements were adopted and would need to be evaluated prior to the adoption of the proposed modifications to Municipal Code Title 16 through Action 1.1 (b). Because the Town has not yet revised its Public Safety Element policies to plan for and address the potential effects of secondary climate change impacts, which would reduce potential environmental impacts related to the proposed modifications of Municipal Code Title 16, mitigation is required prior to implementation of Action 1.1 (b) to adequately evaluate the potential environmental and public safety impacts of facilitating more intensive hillside development than what is currently permitted by the Municipal Code, particularly as it relates to the influence of climate change-induced events (i.e., post storm and wild-fire landslides and debris flows).

Future residential development on hillside properties within the Planning Area could expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death, caused by unstable soils encountered during future construction projects in areas susceptible to deep-seated landslides. Seismic activity, severe weather events, and wildfires could also cause or exacerbate landslides and debris flows in these areas. Existing General Plan policies and actions, including Action PS-2.1, and conformance with CBC requirements would reduce impacts to an extent; however, the inclusion of Action 1.1 (b) in the Project's

proposed Housing Plan necessitates additional measures to ensure the more intensive hillside development that could be constructed adequately accounts for the increasing risk of climate-change induced landslides, debris flows, and post-fire debris flows in the absence of updated Public Safety Element policies addressing these issues. Mitigation Measure GEO-1 is included below to ensure the potential impacts of new hillside subdivision housing facilitated by modifications to Municipal Code Title 16 on surrounding residents and the environment are properly assessed appropriate measures are included in future hillside subdivision project design and implementation to reduce potential impacts related to ground instability both influence and not influenced by climate change impacts.

In addition to compliance with the Town's General Plan and conformance with CBC requirements, implementation of Mitigation Measure GEO-1 would reduce potential Project impacts related to ground instability to ***less than significant with mitigation incorporated.***

Impact GEO-1: The implementation of Action 1.1 (b) of the Draft 2023 – 2031 Housing Element Housing Plan could facilitate more intensive housing development than what is currently permitted on hillside lots in the Planning Area. More intensive hillside development, if not properly studied for potential ground instability impacts, including those influenced by climate change impacts, could adversely affect future subdivision residents, surrounding residents, and the environment by causing or contributing to landslides, debris flows, and other forms of ground instability.

Mitigation Measure GEO-1: Conduct Geotechnical Analysis. Any changes to the existing Municipal Code Title 16 (Subdivisions) shall not result in an increase in geologic or seismic hazards to the public. Prior to adoption of any changes to Hillsborough Municipal Code Title 16 (Subdivisions) made as a result of implementation of Housing Element Action 1.1 (b), the Town shall include within the modifications to Municipal Code Title 16 the following requirements:

- The Town shall develop and incorporate into Municipal Code Title 16 Stability Report requirements for all new proposed hillside subdivisions.

- The soils/geotechnical report required for a new hillside subdivision must evaluate the risks of more intensive housing development on steep and potentially unstable slopes due to increased landslide, debris flows, and post-fire debris flow hazards resulting from climate change impacts. A site-specific geotechnical report must also be prepared for the development of each lot created by a hillside subdivision. Lot-specific geotechnical reports must also analyze site-specific impacts related to landslide, debris flows, and post-fire debris flows, including the potential for the development of the lot to exacerbate ground instability impacts. Further, it must be demonstrated that new hillside subdivision lots would meet the Town's Stability Report requirements.

- New subdivisions in landslide areas and on landslide-prone deposits on steep slopes where it cannot be demonstrated through the required geotechnical report that appropriate mitigation measures can stabilize the site for construction will be prohibited.

- Any work or construction undertaken to correct slope instability or mitigate other geologic hazard conditions to be supervised and certified by a geotechnical engineer and/or an engineering geologist.

Impact GEO-4 – Potential Impacts Related to Soil Incompatibility for Use of Septic Tank or Alternative Wastewater Disposal Systems. *[Threshold of Significance (e)]*

California law (Water Code §13263) requires formal authorization to discharge waste such as sewage. Authorization can be in the form of Water Board permits (called waste discharge requirements) or a waiver. The Water Board also specifies criteria for siting, design, construction, maintenance, and management of onsite wastewater systems to ensure protection of water quality. These specifications are implemented at the local level by the San Mateo County Health Department, including suitability of soils for supporting the use of septic tanks or alternative wastewater disposal systems. Percolation testing is required to determine the adequacy of the soils.

The CBC has general guidelines on infrastructure design and construction based on soil conditions and limitations in California. Throughout the Town's existing development review process, proposed private projects are evaluated against the soil design constraints of the CBC, including those requiring septic or alternative wastewater treatment systems. The Town typically requires this information be provided in a geotechnical constraints report signed by a registered engineer or geologist.

It is not anticipated that future new or redevelopment projects within the Planning Area would require the construction or use of septic tanks or alternative wastewater disposal systems. Wastewater generated by such projects would be conveyed to the municipal sanitary sewer system that is maintained and operated by the Town of Hillsborough Public Works Department.

With implementation of General Plan policies, the CBC, and San Mateo County Health Department requirements, potential impacts related to soil constraints, including soils not capable of accommodating septic systems where proposed for future development within the Planning Area, would be ***less than significant.***

Impact GEO-5 – Potential for Disturbance of Paleontological Resources. *[Threshold of Significance (f)]*

Future residential development facilitated by the proposed Project may involve earth moving activities, including excavation into previously undisturbed native soils. The Planning Area is not known to have paleontological resources but could potentially have unknown resources. In general, most fossils in the Peninsula and San Francisco Regions are found along the immediate Pacific Ocean coastline, and in locations within the outcropping marine units in the Santa Cruz Mountains. The Planning Area may contain isolated geologic features in some of the steeper, less accessible areas. This would be especially important for proposed development on previously undisturbed land that contains steep slopes, rocky outcroppings, or unique geological features. Therefore, there is a low potential of encountering unique paleontological resources in the Planning Area.

Action OSC-5.3 of the General Plan requires construction projects to stop if paleontological resources are uncovered during grading or other on-site excavation activities. Mitigation Measure GEO-2 below would ensure that, if discovered, paleontological resources would be protected. Implementation of General Plan Action OSC-5.3 and Mitigation Measure GEO-2

would reduce potentially significant impacts to less than significant. This impact would be ***less than significant with mitigation incorporated***.

Impact GEO-2: Construction activities associated with residential development that may be facilitated by the Project could disturb paleontological resources.

Mitigation Measure GEO-2: Procedures for Protection of Paleontological Resources. For future residential development facilitated by the Draft 2023 – 2031 Housing Element, the following measures shall be implemented:

(3) Construction Personnel Training. For residential housing projects involving deep excavation activities that are ten feet or greater in depth, the project applicant/designated representative shall organize construction personnel training for all excavation-related construction activities. The training shall be conducted by a qualified paleontologist who meets the Secretary of the Interior's Professional Qualifications Standards. The construction training shall be provided prior to the start of construction. The qualified paleontologist shall provide documentation of the training to the Town.

(4) Procedures for Resources Encountered. For all residential housing projects in the Planning Area, if subsurface paleontological resources are encountered, excavation shall halt within a buffer area of at least 50 feet around the find. Construction activities will not be allowed to continue within the 50-foot buffer area until a paleontologist who meets the Secretary of the Interior's Professional Qualifications Standards evaluates the significance of the resource and its stratigraphic context in light of professional paleontological standards. Work can resume within the 50-foot buffer area at the discretion of the project paleontologist. Work shall be allowed to continue outside the buffer area; however, the paleontologist shall be empowered to temporarily halt or redirect construction activities if additional paleontological resources are found. If the project paleontologist identifies significant paleontological resources, the paleontologist shall prepare a treatment and recovery plan for the identified resources. If treatment and salvage is required, recommendations shall be consistent with Society of Vertebrate Paleontology guidelines and current professional standards.

The project paleontologist shall provide the collected materials to an appropriate museum repository for paleontological specimens for permanent curatorship and storage. The project paleontologist shall also prepare a report documenting the results of treatment and recovery activities and the significance of the fossils and submit the report to the Town. The report, when submitted to the Town, shall signify the completion of the program to mitigate impacts on paleontological resources.

4.6.5 References

County of San Mateo. 2021. 2021 Multijurisdictional Local Hazard Mitigation Plan; Volume 2 – Planning Partner Annexes. October 2021.

Town of Hillsborough. 2005. Hillsborough General Plan. March 14, 2005.

Town of Hillsborough. 2018. Meadowood Estates Subdivision Project Draft Environmental Impact Report. October 2018.

2014 Working Group on California Earthquake Probabilities (WGCEP). 2015. UCERF3: A new earthquake forecast for California's complex fault system: U.S. Geological Survey 2015–3009, 6 p., https://dx.doi.org/10.3133/fs20153009.

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4.7 Greenhouse Gases

This chapter describes the existing environmental and regulatory greenhouse gas (GHG) setting of the Planning Area and evaluates the proposed project's potential GHG emissions impacts. The chapter was prepared using methodologies and assumptions recommended by the Bay Area Air Quality Management District (BAAQMD). This GHG analysis has been closely coordinated with the Air Quality and Energy analyses in Sections 4.2 and 4.5 of this EIR. Please refer to Appendix C for detailed GHG emissions estimates (MIG, 2023).

4.7.1 Environmental Setting

Climate Change

Climate change is the distinct change in measures of climate over a long period of time. Climate change can result from natural processes and from human activities. Natural changes in the climate can be caused by indirect processes, such as changes in the Earth's orbit around the Sun, or direct changes within the climate system itself (i.e., changes in ocean circulation). Human activities can affect the atmosphere through emissions of gases and changes to the planet's surface. Emissions affect the atmosphere directly by changing its chemical composition, while changes to the land surface indirectly affect the atmosphere by changing the way the Earth absorbs gases from the atmosphere. The term "climate change" is preferred over the term "global warming" because "climate change" conveys the fact that other changes can occur beyond just average increase in temperatures near the Earth's surface. Elements that indicate that climate change is occurring on Earth include:

- Rising of global surface temperatures by 1.3° Fahrenheit (°F) over the last 100 years;
- Changes in precipitation patterns;
- Melting ice in the Arctic;
- Melting glaciers throughout the world;
- Rising ocean temperatures;
- Acidification of oceans; and
- Range shifts in plant and animal species.

Climate change is intimately tied to the Earth's greenhouse effect. The greenhouse effect is a natural occurrence that helps regulate the temperature of the planet, and without it, life as we know it on Earth would not exist. Since the beginning of the industrial revolution (approximately 150 years), human activities have been adding to the natural greenhouse effect by increasing the gases in the atmosphere that "trap" energy, thereby contributing to an average increase in the Earth's temperature. Human activities that enhance the greenhouse effect are detailed below.

Greenhouse Gases

Gases that absorb and emit infrared thermal radiation (heat) in the atmosphere and affect regulation of the Earth's temperature are known as greenhouse gases (GHGs). There are many compounds present in the Earth's atmosphere which are GHGs, including but not limited to water vapor (H_2O), carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O). GHGs allow solar radiation (sunlight) to enter the atmosphere freely. When solar radiation strikes the earth's surface, it is either absorbed by the atmosphere, land, and ocean surface, or reflected back

toward space. The land and ocean surface that has absorbed solar radiation warms up and emits infrared radiation toward space. GHGs absorb some of this infrared radiation and "trap" the energy in the earth's atmosphere. Entrapment of too much infrared radiation produces an effect commonly referred to as the "greenhouse effect." Human activities since the beginning of the Industrial Revolution (approximately 1750) have increased atmospheric GHG concentrations. Average global surface temperatures have risen as a result of GHG emissions. This increase in globally averaged surface temperatures is commonly referred to as "Global Warming," although the term "Global Climate Change" is preferred because effects associated with increased GHG concentrations are not just limited to higher global temperatures (NOAA 2023a).

GHGs that contribute to climate regulation are a different type of pollutant than criteria or hazardous air pollutants because climate regulation is global in scale, in terms of both causes and effects. Some GHGs are emitted to the atmosphere naturally by biological and geological processes such as evaporation (water vapor), aerobic respiration (carbon dioxide, or CO_2), and off-gassing from low-oxygen environments such as swamps or exposed permafrost (methane or CH_4). However, GHG emissions from human activities such as fuel combustion (e.g., CO_2) and refrigerant use (e.g., hydrofluorocarbons, or HFCs) significantly contribute to overall GHG concentrations in the atmosphere, climate regulation, and global climate change. Human production of GHG has increased steadily since pre-industrial times (pre-1880), and atmospheric CO_2 concentrations have increased from a pre-industrial value of 280 parts per million (ppm) in the early 1800s to approximately 424 ppm in May 2023 (NOAA 2023b). The effects of increased GHG concentrations in the atmosphere include increasing shifts in temperature and precipitation patterns and amounts, reduced ice and snow cover, sea level rise, and acidification of oceans. These effects in turn will impact food and water supplies, infrastructure, ecosystems, and overall public health and welfare.

The 1997 United Nations' Kyoto Protocol international treaty set targets for reductions in emissions of four specific GHGs - CO_2, CH_4, nitrous oxide (N_2O), and sulfur hexafluoride (SF_6), and two groups of gases¬ - HFCs and perfluorocarbons (PFCs). These are the primary GHGs emitted into the atmosphere by human activities. Water vapor is also a common GHG that regulates the Earth's temperature; however, the amount of water vapor in the atmosphere can change substantially from day to day, whereas other GHG emissions remain in the atmosphere for longer periods of time. Black carbon consists of particles emitted during combustion; although a particle and not a gas, black carbon also acts to trap heat in the Earth's atmosphere. The most common GHGs are described below.

- **Carbon Dioxide (CO_2)** is emitted and removed from the atmosphere naturally. Animal and plant respiration involves the release of CO_2 from animals and its absorption by plants in a continuous cycle. The ocean-atmosphere exchange results in the absorption and release of CO_2 at the sea surface. CO_2 is also released from plants during wildfires. Volcanic eruptions release a small amount of CO_2 from the Earth's crust. Human activities that affect CO_2 in the atmosphere include burning of fossil fuels, industrial processes, and product uses. Combustion of fossil fuels used for electricity generation and transportation are the largest source of CO_2 emissions in the United States. When fossil fuels are burned, the carbon stored in them is released into the atmosphere entirely as CO_2. Emissions from industrial activities also emit CO_2 such as cement,

metal, and chemical production and the use of petroleum produced in plastics, solvents, and lubricants.

- **Methane (CH_4)** is emitted from human activities and natural sources. Natural sources of CH_4 include wetlands, gas hydrates, permafrost, termites, oceans, freshwater bodies, soils, and wildfires. Human activities that cause CH_4 releases include fossil fuel production, animal digestive processes from farms, manure management, and waste management. It is estimated that 50 percent of global CH_4 emissions are human generated. Releases from animal digestive processes at agricultural operations are the primary source of human-related CH_4 emissions. CH_4 is produced from landfills as solid waste decomposes. CH_4 is a primary component of natural gas and is emitted during its production, processing, storage, transmission, distribution, and use. Decomposition of organic material in manure stocks or in liquid manure management systems also releases CH_4. Wetlands are the primary natural producers of CH_4 because the habitat is conducive to bacteria that produce CH_4 during decomposition of organic material.
- **Nitrous Oxide (N_2O)** is emitted from human sources such as agricultural soil management, animal manure management, sewage treatment, combustion of fossil fuels, and production of certain acids. N_2O is produced naturally in soil and water, especially in wet, tropical forests. The primary human-related source of N_2O is agricultural soil management due to the use of synthetic nitrogen fertilizers and other techniques to boost nitrogen in soils. Combustion of fossil fuels (mobile and stationary) is the second leading source of N_2O, although parts of the world where catalytic converters are used (such as California) have significantly lower levels than those areas that do not.
- **Sulfur Hexafluoride (SF_6)** is commonly used as an electrical insulator in high-voltage electrical transmission and distribution equipment such as circuit breakers, substations, and transmission switchgear. Releases of SF_6 occur during maintenance and servicing as well as from leaks of electrical equipment.
- **Hydrofluorocarbons (HFCs) and Perfluorocarbons (PFCs)** are entirely human made and are mainly generated through various industrial processes. These types of gases are used in aluminum production, semiconductor manufacturing, and magnesium production and processing. HFCs and PFCs are also used as substitutes for ozone-depleting gases like chlorofluorocarbons (CFCs) and halons.

In 1997, the United States (U.S.) was a signatory to the Kyoto Protocol; however, the treaty was not sent to Congress for ratification. Thus, while a signatory to the Kyoto Protocol, the U.S. is not an official party to this international agreement and is not subject to any emission reductions goals established pursuant to the Kyoto Protocol. Although the U.S. is not a party to this agreement, the GHGs targeted for reduction by the Kyoto Protocol are also targeted under federal and State GHG reporting and emissions reduction programs.

GHGs can remain in the atmosphere long after they are emitted. The potential for a particular greenhouse gas to absorb and trap heat in the atmosphere is considered its global warming potential (GWP). The reference gas for measuring GWP is CO_2, which has a GWP of one. By comparison, CH_4 has a GWP of 25, which means that one molecule of CH_4 has 25 times the effect on global warming as one molecule of CO_2. Multiplying the estimated emissions for non-CO_2 GHGs by their GWP determines their CO_2 equivalent (CO_2e), which enables a project's combined GWP to be expressed in terms of mass CO_2 emissions. The GWP and estimated atmospheric lifetimes of the common GHGs are shown in Table 4.7-1.

Table 4.7-1: Global Warming Potential (GWP) of Common GHGs (100-Year Horizon)			
GHG	**GWP(A)**	**GHG**	**GWP(A)**
Carbon Dioxide (CO_2)	1	Perfluorocarbons (PFCs)	
Methane (CH_4)	28	CF_4	6,630
Nitrous Oxide (N_2O)	265	C2F6	11,100
Hydrofluorocarbons (HFCs)		C4F10	9,200
HFC-23	12,400	C6F14	7,910
HFC-134a	1,300	Sulfur Hexafluoride (SF_6)	23,500
HFC-152a	138		
HCFC-22	1,760		
Source: IPCC, 2014 GWPs are based on the United Nations Intergovernmental Panel on Climate Change 5th Assessment Report.			

Climate Change and California

The 2009 California Climate Adaptation Strategy prepared by the California Natural Resources Agency (CNRA) identified anticipated impacts to California due to climate change through extensive modeling efforts. General climate changes in California indicate that:

- California is likely to get hotter and drier as climate change occurs with a reduction in winter snow, particularly in the Sierra Nevada mountain range.
- Some reduction in precipitation is likely by the middle of the century.
- Sea levels will rise up to an estimated 55 inches.
- Extreme events such as heat waves, wildfires, droughts, and floods will increase.
- Ecological shifts of habitat and animals are already occurring and will continue to occur (CNRA, 2009).

It should be noted that the changes listed above are based on the results of several models prepared under different climatic scenarios; therefore, discrepancies occur between the projections and the interpretation. The potential impacts of global climate change in California are detailed below.

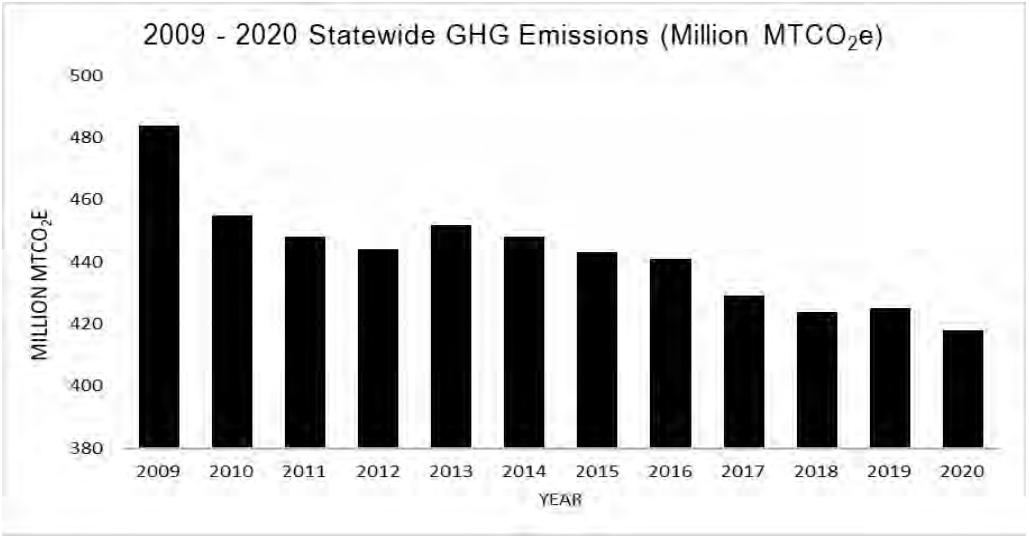
In January 2018, the CNRA adopted Safeguarding California Plan: 2018 Update, which builds on nearly a decade of adaptation strategies to communicate current and needed actions State government should take to build climate change resiliency. It identifies hundreds of ongoing actions and next steps that State agencies are taking to safeguard Californians from climate impacts within a framework of 81 policy principles and recommendations. The 2018 update also has two new chapters and incorporates a feature showcasing the many linkages among policy areas. A new “Climate Justice” chapter highlights how equity is woven throughout the entire plan (CNRA, 2018).

Statewide GHG Emissions

CARB prepares an annual statewide GHG emission inventory using regional, State, and federal data sources, including facility-specific emissions reports prepared pursuant to the State's Mandatory GHG Reporting Program. The statewide GHG emission inventory helps CARB track progress towards meeting the State's Assembly Bill (AB) 32 GHG emissions target of 431 million metric tons of CO_2 equivalents (MTCO2e), as well as establish and understand trends in GHG emissions. Statewide GHG emissions for the 2009 to 2020 time period are shown in Table 4.7-2.

Table 4.7-2: 2009-2020 Statewide GHG Emissions (Million MTCO2e)

Scoping Plan Sector	Year											
	'09	'10	'11	'12	'13	'14	'15	'16	'17	'18	'19	'20
Agriculture	33	34	34	35	34	34	33	32	32	32	31	32
Commercial/Residential	45	46	46	39	39	36	36	37	38	37	41	39
Electric Power	101	90	89	99	93	90	86	70	64	65	60	60
High GWP	12	14	15	16	17	18	19	19	20	21	21	21
Industrial	86	88	86	81	83	85	83	82	82	82	80	73
Recycling and Waste	8	8	8	8	8	8	8	9	9	9	9	9
Transportation	166	163	160	157	157	158	162	165	167	165	162	136
Total Million MTCO2e(A)	450	442	437	435	432	428	427	415	411	411	404	369



Source: CARB, 2022a

A CARB approved use of 431 million MTCO2e as the state's 2020 GHG emission target in May 2014. Previously, the target had been set at 427 million MTCO2e. Totals may not equal due to rounding. CARB inventory uses GWPs based on the United Nations' IPCC's 4th Assessment Report

As shown in Table 4.7-2, statewide GHG emissions have generally decreased over the last decade, with 2020 levels (369 million MTCO2e) approximately 18 percent less than 2009 levels (450 million MTCO2e) and below the State's 2020 reduction target of 431 million MTCO2e. The transportation sector (136 million MTCO2e) accounted for approximately 37 percent of the state's total GHG emissions inventory (369 million MTCO2e) in 2020.

Existing Planning Area GHG Emissions

The existing land uses within the Planning Area contribute to existing city, regional, and statewide GHG emissions. The Planning Area's existing GHG emissions, presented below in Table 4.7-3 (Existing [2020] GHG Emissions in the Planning Area), were estimated using the California Emissions Estimator Model (CalEEMod), Version 2022.1. Residential GHG emissions generated within the Town primarily come from the following sources:

- **Small "area" sources.** Existing land uses generate emissions from small area sources that combust fuel, such as gasoline-powered landscaping equipment.
- **Energy use and consumption.** Existing land uses generate emissions from the combustion of natural gas in building water and space heating equipment, as well as industrial processes. Existing land uses also generate indirect GHG emissions from the purchased electricity.
- **Mobile sources.** Existing land uses generate emissions from vehicles travelling to and from the town.
- **Solid waste disposal:** Existing land uses generate GHG emissions from the transport and disposal of landfilled waste.
- **Water/wastewater:** Existing land uses generate GHG emissions from electricity used to supply water to land uses, and treat the resulting wastewater generated.
- **Refrigerants:** Emissions from air conditioning and refrigeration equipment.

The Planning Area's existing residential GHG emissions were estimated using default emissions assumptions provided by CalEEMod, with the following project-specific modifications:

- **Land Use Development:** Consistent with the transportation modeling conducted for the proposed project by Kittleson and Associates, approximately 3,750 single-family residences were modeled for estimating GHG emissions.
- **Energy Use:** Existing energy consumption estimates were derived from data available through the County of San Mateo's Regional Integrated Climate Action Planning Suite (RICAPS) Program (San Mateo County, ND). The specific values used for Year 2020 modeling were developed based on existing trends within the Town between 2010 and 2015, which showed an overall decrease in electricity and natural gas consumption over that six-year period. Overall community-wide electricity and natural gas consumption were estimated to be approximately 46,114,014 kWh and 283,970,348 kBtu in 2020.
- **Mobile Sources:** Mobile source emissions were estimated based on a combination of default and project-specific assumptions as described below:
    - **Trip Generation Rates:** CalEEMod weekday and weekend default trip generation rates were modified to reflect the trip generation estimates derived from the traffic and VMT analysis prepared for the Focused GPU. The Town is anticipated to generate approximately 44,597 trips under 2020 no-project conditions, and 39,868 trips under 2040 conditions without adoption of the Focused GPU.

- **Trip distances:** CalEEMod default trip lengths were modified based on the project-specific trip and VMT estimates derived from the traffic and VMT analysis prepared for the Focused GPU (see Chapter 4.14).

Table 4.7-3: Existing Land Use GHG Emissions Estimates

Source	GHG Emissions (Metric Tons / Year)			
	CO_2	CH_4	N_2O	Total $MTCO_2e$
Existing Land Use Operational Emissions in Year 2020 (Current Conditions)				
Mobile	37,982.0	2.2	1.7	38,641.0
Area	110.9	<0.1	<0.1	111.1
Energy	17,159	2.0	0.1	17,243
Water	182.7	4.5	0.1	327.4
Waste	251.0	25.1	0.0	878.2
Refrigerants	0.0	0.0	0.0	8.7
Total Existing GHG(A)	55,686	33.8	1.9	57,209
Number of Town Residents				11,410
Existing GHG Efficiency (MTCO2e/yr/Capita)				5.01
Existing Land Use Operational Emissions in Year 2040 (Future Conditions)				
Mobile	30,188.0	1.0	1.0	30,528.0
Area	110.9	<0.1	<0.1	111.1
Energy	15,067	1.3	<0.1	15,109
Water	43.1	4.4	0.1	185.1
Waste	237.6	23.7	0.0	831.3
Refrigerants	0.0	0.0	0.0	8.7
Total Existing GHG(A)	45,647	30.6	1.2	46,774
Number of Town Residents				11,410
Existing GHG Efficiency (MTCO2e/yr/Capita)				4.10

Source: MIG, 2023 (see Appendix C)
Totals may not equal due to rounding.

The emissions generated by current land uses in the Planning Area are shown in Table 4.7-3. The emissions are shown for two scenarios:

- Year 2020 (current conditions), which are based on Year 2020 vehicle fleet characteristics (e.g., vehicle type, age, emission rates), and are consistent with the existing conditions transportation data prepared for the proposed project by Kittleson and Associates.
- Year 2040 (future conditions), which are based on Year 2040 vehicle fleet characteristics and RPS energy goals (CalEEMod assumes Peninsula Clean Energy (PCE) would

source 100% of its electricity from renewable sources by Year 2040) and represent the projected emissions that existing residential land uses would generate in the future (assuming no increase in population or change in land uses). This scenario helps characterize how emissions in the future would be anticipated to change due to existing regulatory requirements, regardless of whether the project is adopted or not.

4.7.2 Regulatory Framework

International and Federal

International Regulation and the Kyoto Protocol

In 1988, the United Nations established the Intergovernmental Panel on Climate Change (IPCC) to evaluate the impacts of global warming and to develop strategies that nations could implement to curtail global climate change. In 1992, the United States joined other countries around the world in signing the "United Nations' Framework Convention on Climate Change" agreement with the goal of controlling GHG emissions. As a result, the Climate Change Action Plan was developed to address the reduction of GHGs in the United States. The plan currently consists of more than 50 voluntary programs for member nations to adopt.

Federal Regulation and the Clean Air Act

On December 7, 2009, the U.S. EPA issued an endangerment finding that current and projected concentrations of the six Kyoto GHGs in the atmosphere (CO_2, CH_4, N_2O, SF_6, HFCs, and PFCs) threaten the public health and welfare of current and future generations. This finding came in response to the Supreme Court ruling in *Massachusetts v. EPA*, which found that GHGs are pollutants under the Federal Clean Air Act. As a result, the U.S. EPA issued its GHG Tailoring Rule in 2010, which applies to facilities that have the potential to emit more than 100,000 MTCO2e. In 2014, the U.S. Supreme Court issued its decision in *Utility Air Regulatory Group v. EPA* (No. 12-1146), finding that the U.S. EPA may not treat GHGs as an air pollutant for purposes of determining whether a source is a "major" source required to obtain a permit pursuant to the "Clean Air Act's Prevention of Significant Deterioration" or "Title V" operating permit programs. The U.S. EPA's Greenhouse Gas Reporting Program requires facilities that emit 25,000 MTCO2e or more of GHG to report their GHG emissions to the U.S. EPA to inform future policy decisionmakers.

The Current Administration

The United States participates in the United Nations Framework Convention on Climate Change. While the United States signed the Kyoto Protocol, which would have required reductions in GHGs, Congress never ratified the protocol. The Federal government chose voluntary and incentive-based programs to reduce emissions and has established programs to promote climate technology and science. In 2015, the Paris Agreement was adopted, which aims at keeping global temperature rise this century below 2 degrees Celsius above pre-industrial levels and pursuing efforts to limit temperature increase above an additional 1.5 degrees Celsius. The Agreement was signed by President Obama in April 2016, but the agreement does not contain enforcement provisions that would require U.S. Senate ratification. On November 4, 2019, President Trump formally began the process to leave the Paris Climate Agreement. In accordance with Article 28 of the Paris Agreement, that process was complete on

November 4, 2020. President Biden subsequently signed an executive order to have the United States rejoin the Paris Climate Agreement. At this time, there are no federal regulations or policies pertaining to GHG emissions that directly apply to the project.

Federal Vehicle Standards

In 2009, the NHTSA issued a final rule regulating fuel efficiency and GHG emissions from cars and light-duty trucks for model year 2011; and, in 2010, the U.S. EPA and NHTSA issued a final rule regulating cars and light-duty trucks for model years 2012–2016.

In 2010, President Obama issued a memorandum directing the Department of Transportation, Department of Energy, U.S. EPA, and NHTSA to establish additional standards regarding fuel efficiency and GHG reduction, clean fuels, and advanced vehicle infrastructure. In response to this directive, EPA and NHTSA proposed stringent, coordinated federal GHG and fuel economy standards for model years 2017–2025 light-duty vehicles. The proposed standards projected to achieve 163 grams per mile of CO_2 in model year 2025, on an average industry fleetwide basis, which is equivalent to 54.5 miles per gallon if this level were achieved solely through fuel efficiency. The final rule was adopted in 2012 for model years 2017–2021, and NHTSA intends to set standards for model years 2022–2025 in a future rulemaking.

In addition to the regulations applicable to cars and light-duty trucks described above, in 2011, the EPA and NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks for model years 2014–2018. The standards for CO_2 emissions and fuel consumption are tailored to three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to the U.S. EPA, this regulatory program will reduce GHG emissions and fuel consumption for the affected vehicles by 6 percent to 23 percent over the 2010 baselines.

In August 2016, the EPA and NHTSA announced the adoption of the phase two program related to the fuel economy and GHG standards for medium- and heavy-duty trucks. The phase two program will apply to vehicles with model year 2018–2027 for certain trailers, and model years 2021–2027 for semi-trucks, large pickup trucks, vans, and all types and sizes of buses and work trucks. The final standards are expected to lower CO_2 emissions by approximately 1.1 billion metric tons (MT) and reduce oil consumption by up to 2 billion barrels over the lifetime of the vehicles sold under the program (U.S. EPA and NHTSA, 2016).

In August 2018, The USEPA and NHTSA released a notice of proposed rulemaking called Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021-2026 Passenger Cars and Light Trucks (SAFE Vehicles Rule). On September 27, 2019, the U.S. EPA and the NHTSA published the SAFE Vehicles Rule Part One: One National Program." (84 Fed. Reg. 51,310 (Sept. 27, 2019.) The Part One Rule revoked California's authority to set its own greenhouse gas emissions standards and set zero emission vehicle mandates in California (CARB 2019b). In April 2020, the U.S. EPA and NHTSA issued the SAFE Vehicles Rule for Model Years 2021-2026 Passenger Cars and Light Trucks (Final SAFE Rule) that relaxed federal greenhouse gas emissions and fuel economy standards. The Final SAFE Rule relaxed federal greenhouse gas emissions and Corporate Average Fuel Economy (CAFE) standards to increase in stringency at approximately 1.5 percent per year from model year (MY) 2020 levels over MYs 2021–2026.

The previously established emission standards and related "augural" fuel economy standards would have achieved approximately 4 percent per year improvements through MY 2025.

The NHTSA repealed and the U.S. EPA rescinded the SAFE Rule Part One in December 2021 and March 2022, respectively, restoring California's authority to implement its GHG standards and ZEV mandates (NHTSA 2022, U.S. EPA 2022).

State

Assembly Bill 32 (California Global Warming Solutions Act) and Related GHG Goals

In September 2006, Governor Arnold Schwarzenegger signed AB 32, the California Climate Solutions Act of 2006. AB 32 establishes the caps on statewide greenhouse gas emissions proclaimed in Executive Order (EO) S-3-05 and established the timeline for meeting State GHG reduction targets. The deadline for meeting the 2020 reduction target was December 31, 2020.

As part of AB 32, CARB determined 1990 GHG emissions levels and projected a "business-as-usual" (BAU)[27] estimate for 2020, to determine the amount of GHG emission reductions that would need to be achieved. In 2007, CARB approved a statewide 1990 emissions level and corresponding 2020 GHG emissions limit of 427 million MTCO2e (CARB, 2007). In 2008, CARB adopted its Climate Change Scoping Plan, which projects 2020 statewide GHG emissions levels of 596 million MTCO2e and identifies numerous measures (i.e., mandatory rules and regulations and voluntary measures) that will achieve at least 174 million MTCO2e of GHG reductions and bring statewide GHG emissions to 1990 levels by 2020 (CARB, 2009).

EO B-30-15, 2030 Carbon Target and Adaptation, issued by Governor Brown in April 2015, set a target of reducing GHG emissions by 40 percent below 1990 levels in 2030. To achieve this ambitious target, Governor Brown identified five key goals for reducing GHG emissions in California through 2030:

- Increase renewable electricity to 50 percent.
- Double energy efficiency savings achieved in existing buildings and make heating fuels cleaner.
- Reduce petroleum use in cars and trucks by up to 50 percent.
- Reduce emissions of short-lived climate pollutants.
- Manage farms, rangelands, forests, and wetlands to increasingly store carbon.

By directing State agencies to take measures consistent with their existing authority to reduce GHG emissions, EO B-30-15 establishes coherence between the 2020 and 2050 GHG reduction goals set by AB 32 and seeks to align California with the scientifically established GHG emissions levels needed to limit global warming below two degrees Celsius.

To reinforce the goals established through EO B-30-15, Governor Brown signed SB 32 and AB 197 on September 8, 2016. SB 32 made the GHG reduction target (to reduce GHG emissions by 40 percent below 1990 levels by 2030) a requirement, as opposed to a goal. AB 197 gives the Legislature additional authority over CARB to ensure the most successful strategies for

[27] BAU is a term used to define emissions levels without considering reductions from future or existing programs or technologies.

lowering emissions are implemented, and requires CARB to, “protect the State’s most impacted and disadvantaged communities [and] consider the social costs of the emissions of greenhouse gases.”

On September 16, 2022, Governor Newson signed into law AB 1279, the California Climate Crisis Act, and SB 1020, the Clean Energy, Jobs, and Affordability Act of 2022. AB 1279 codified California’s 2045 carbon neutrality goal and established a GHG emission reduction target of 85 percent below 1990 levels. SB 1020 set targets for the retail sale of electricity of 90 percent clean electricity by 2035 and 95 percent by 2040, and 100 percent by 2045. It also set a target for 100 percent clean electricity for electricity serving state agencies by 2035.

Scoping Plan

The CARB Scoping Plan is the comprehensive plan primarily directed at identifying the measures necessary to reach the GHG reduction targets stipulated in AB 32. The key elements of the 2008 Scoping Plan were to expand and strengthen energy efficiency programs, achieve a statewide renewable energy mix of 33 percent, develop a cap-and-trade program with other partners (including seven states in the United States and four territories in Canada) in the Western Climate Initiative, establish transportation-related targets, and establish fees (CARB, 2009). CARB estimated that implementation of these measures will achieve at least 174 million MTCO2e of reductions and reduce statewide GHG emissions to 1990 levels by 2020 (CARB, 2009).

In a report prepared on September 23, 2010, CARB indicated 40 percent of the reduction measures identified in the Scoping Plan had been secured (CARB 2010). Although the cap-and-trade program began on January 1, 2012 (after CARB completed a series of activities dealing with the registration process, compliance cycle, and tracking system), covered entities did not have an emissions obligation until 2013. In August 2011, the Scoping Plan was reapproved by CARB with the program’s environmental documentation.

On February 10, 2014, CARB released the public draft of the “First Update to the Scoping Plan.” “The First Update” built upon the 2008 Scoping Plan with new strategies and recommendations, and identified opportunities to leverage existing and new funds to further drive GHG emission reductions through strategic planning and targeted low carbon investments (CARB 2014). “The First Update” defined CARB’s climate change priorities over the next five years, and set the groundwork to reach post-2020 goals set forth in Executive Orders S-3-05 and B-16-12. It also highlighted California’s progress toward meeting the 2020 GHG emission reduction goals defined in the 2008 Scoping Plan. “The First Update” evaluated how to align the State’s long-term GHG reduction strategies with other State policy priorities for water, waste, natural resources, clean energy, transportation, and land use. “The First Update” to the Scoping Plan was approved by the Board on May 22, 2014.

The second update to the scoping plan, the 2017 Climate Change Scoping Plan update (CARB 2017), was adopted by CARB in December 2017. The primary objective for the 2017 Climate Change Scoping Plan is to identify the measures required to achieve the mid-term GHG reduction target for 2030 (i.e., reduce emissions by 40 percent below 1990 levels by 2030) established under EO B-30-15 and SB 32. The 2017 Climate Change Scoping Plan identifies an increased need for coordination among State, regional, and local governments to realize the potential for GHG emissions reductions that can be gained from local land use decisions.

The third update to the scoping plan, the 2022 Scoping Plan, was released in May 2022 and adopted by CARB in December 2022 (CARB 2022b). The plan presents a scenario for California to meet the State goal of reducing GHG emissions 40 percent below 1990 levels by 2030 and to achieve carbon neutrality by 2045 (CARB 2022b). Specifically, the 2022 Scoping Plan:

- Identifies a path to keep California on track to meet its SB 32 GHG reduction target of at least 40 percent below 1990 emissions by 2030.
- Identifies a technologically feasible, cost-effective path to achieve carbon neutrality by 2045 and a reduction in anthropogenic emissions by 85 percent below 1990 levels.
- Focuses on strategies for reducing California's dependency on petroleum to provide consumers with clean energy options that address climate change, improve air quality, and support economic growth and clean sector jobs.
- Integrates equity and protecting California's most impacted communities as driving principles throughout the document.
- Incorporates the contribution of natural and working lands (NWL) to the state's GHG emissions, as well as their role in achieving carbon neutrality.
- Relies upon the most up-to-date science, including the need to deploy all viable tools to address the existential threat that climate change presents, including carbon capture and sequestration, as well as direct air capture.
- Evaluates the substantial health and economic benefits of taking action.
- Identifies key implementation actions to ensure success.

Senate Bill 375 (Sustainable Communities and Climate Protection Act)

In January 2009, California SB 375 went into effect known as the Sustainable Communities and Climate Protection Act. The objective of SB 375 is to better integrate regional planning of transportation, land use, and housing to reduce greenhouse gas emissions and other air pollutants. SB 375 tasks CARB to set GHG reduction targets for each of California's 18 regional Metropolitan Planning Organizations (MPOs). Each MPO is required to prepare a Sustainable Communities Strategy (SCS) as part of their Regional Transportation Plan (RTP). The SCS is a growth strategy in combination with transportation policies that will show how the MPO will meet its GHG reduction target. If the SCS cannot meet the reduction goal, an Alternative Planning Strategy may be adopted that meets the goal through alternative development, infrastructure, and transportation measures or policies.

Plan Bay Area

Plan Bay Area, initially adopted by the Association of Bay Area Governments (ABAG) and Metropolitan Transportation Commission (MTC) on July 18, 2013, is the integrated long-range transportation, land-use, and housing plan developed for the Bay Area pursuant to SB 375. The success of Plan Bay Area implementation is evaluated on thirteen different goals with corresponding performance targets. One of these goals, reducing per-capita CO_2 emissions from cars and light-duty trucks by 15 percent by 2035, is directly related to GHG emissions (CARB 2018).

One of the most noteworthy aspects of Plan Bay Area is that the forecasted development pattern, also known as the preferred scenario, virtually accommodates all new development within the existing urbanized footprint of the Bay Area. Approximately 80 percent of new

development anticipated in Plan Bay Area is located throughout nearly 200 different Priority Development Areas (PDAs). PDAs are transit-oriented, infill development opportunity areas nominated by jurisdictions in existing communities in areas where future growth would not increase urban sprawl. It is important to emphasize that although PDAs have been identified in the regional plan, individual jurisdictions throughout the Bay Area are not required to constrain future land use designations and development to the preferred scenario described in Plan Bay Area (i.e., lead agencies retain the authority to approve land use designations and projects). Instead, the SCS must consider a local jurisdiction's General Plan. The Town of Hillsborough does not have any PDAs.

An update to Plan Bay Area, titled Plan Bay Area 2040, was jointly approved by the ABAG Executive Board and by MTC on July 26, 2017. Unlike the 2013 version of Plan Bay Area, Plan Bay Area 2040 is a limited and focused update that reevaluates projected household and employment growth in the Bay Area over the next 24 years. The success of Plan Bay Area 2040 implementation is evaluated on the same 13 goals and performance targets as the 2013 version of Plan Bay Area. The 2017 update continues to provide a roadmap for accommodating expected growth in the Bay Area, and connecting it to a transportation investment strategy focused on moving the Bay Area toward key regional goals for the environment (e.g., state GHG reduction goals), economy, and social equity (ABAG/MTC 2017). On October 1, 2021, MTC and ABAG released Plan Bay Area 2050, which focuses on the elements of Housing, Economy, Transportation, and Environment. Across these elements, there were a total of 35 strategies, which are long-term policies or investments, and 80 implementation actions, which contain advocacy and legislation, initiatives, and planning and research. Plan Bay Area 2050 projects that it would achieve a 20 percent reduction in GHG emissions from cars and light duty trucks by 2035 if all of its strategies were implemented, which would meet SB 375's GHG target (ABAG/MTC 2021).

Senate Bill 350 (Clean Energy and Pollution Reduction Act) and Senate Bill 100

SB 350 was signed into law in September 2015 and establishes tiered increases to the RPS. The Bill requires 40 percent of the state's energy supply to come from renewable sources by 2024, 45 percent by 2027, and 50 percent by 2030. SB 350 also set a new goal to double the energy-efficiency savings in electricity and natural gas through energy efficiency and conservation measures. SB 100, signed by Governor Brown on September 10, 2018, increased the RPS requirement for 2030 from 50 percent to 60 percent.

Assembly Bill 1493 and Advanced Clean Cars Program

With the passage of AB 1493 (Pavley I) in 2002, California launched an innovative and pro-active approach for dealing with GHG emissions and climate change at the state level. AB 1493 requires CARB to develop and implement regulations to reduce automobile and light truck GHG emissions. These stricter emissions standards apply to automobiles and light trucks from 2009 through 2016. Although litigation was filed challenging these regulations, and the U.S. EPA initially denied California's related request for a waiver, a waiver was granted. In 2012, the U.S. EPA issued a Final Rulemaking that sets even more stringent fuel economy and GHG emissions standards for model years 2017 through 2025 among light-duty vehicles.

In January 2012, CARB approved the Advanced Clean Cars (ACC) Program (formerly known as Pavley II) for model years 2017-2025. The components of the ACC program are the Low-Emission Vehicle (LEV) regulations and the ZEV regulation. The Program combines the control

of smog, soot, and global warming gases with requirements for greater numbers of zero-emission vehicles into a single package of standards. By 2025, new automobiles under California's ACC Program will emit 34 percent less global warming gases and 75 percent less smog-forming emissions.

Executive Order B-48-18, issued by Governor Brown in January 2018, establishes a target to have five million ZEVs on the road in California by 2030. This Executive Order is supported by the State's 2018 ZEV Action Plan Priorities Update, which expands upon the State's 2016 ZEV Action Plan. While the 2016 plan remains in effect, the 2018 update functions as an addendum, highlighting the most important actions State agencies are taking in 2018 to implement the directives of Executive Order B-48-18.

EO N-79-20, issued by Governor Newsom in September 2020, set a goal that 100 percent of in-state sales of new passenger cars and trucks will be zero-emission by 2035. It also set a goal that 100 percent of medium- and heavy-duty vehicles in the state be zero-emission by 2045 for all operations where feasible and by 2035 for drayage trucks. In addition, this EO set a goal to transition to 100 percent zero-emission off-road vehicles and equipment in the state by 2035 where feasible. In August 2022, CARB approved the Advanced Clean Cars II program, which sets requirements for ZEV sales and codifies the light-duty vehicle goals in EO N-79-20. The regulation requires new light duty vehicle sales will be 35 percent zero emission or plug in hybrid electric vehicles in 2026, 68 percent in 2030, and 100 percent in 2035.

Executive Order B-55-18, AB 1279, and SB 1020

On September 10, 2018, Governor Brown signed Executive Order B-55-18, to achieve carbon neutrality by moving California to 100 percent clean energy by 2045. This Executive Order also includes specific measures to reduce GHG emissions via clean transportation, energy efficient buildings, directing cap-and-trade funds to disadvantaged communities, and better management of the state's forest land. On September 16, 2022, Governor Newson signed into law AB 1279, the California Climate Crisis Act, and SB 1020, the Clean Energy, Jobs, and Affordability Act of 2022. AB 1279 codified California's 2045 carbon neutrality goal and established a GHG emission reduction target of 85 percent below 1990 levels. SB 1020 set targets for the retail sale of electricity of 90 percent clean electricity by 2035 and 95 percent by 2040, and 100 percent by 2045. It also set a target for 100 percent clean electricity for electricity serving state agencies by 2035.

Title 24 Energy Standards

The California Energy Commission (CEC) first adopted Energy Efficiency Standards for Residential and Nonresidential Buildings in 1978 in response to a legislative mandate to reduce energy consumption in the State. Although not originally intended to reduce GHG emissions, increased energy efficiency, and reduced consumption of electricity, natural gas, and other fuels would result in fewer GHG emissions from residential and nonresidential buildings subject to the standard. The standards are updated periodically to allow for the consideration and inclusion of new energy efficiency technologies and methods.

Part 11 of the Title 24 Building Standards Code is referred to as the California Green Building Standards Code (CALGreen Code). The purpose of the CALGreen Code is to "improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging

sustainable construction practices in the following categories: (1) planning and design; (2) energy efficiency; (3) water efficiency and conservation; (4) material conservation and resource efficiency; and (5) environmental air quality." The CALGreen Code is not intended to substitute or be identified as meeting the certification requirements of any green building program that is not established and adopted by the California Building Standards Commission (CBSC).

CALGreen Code contains both mandatory and voluntary measures. For non-residential land uses there are 39 mandatory measures including, but not limited to exterior light pollution reduction, wastewater reduction by 20 percent, and commissioning of projects over 10,000 square feet. Two tiers of voluntary measures apply to non-residential land uses, for a total of 36 additional elective measures.

California's Building Energy Efficiency Standards are updated on an approximately three-year cycle. The 2019 standards, focused on three key areas: proposing new requirements for installation of solar photovoltaics for newly constructed low-rise residential buildings, updating current ventilation and Indoor Air Quality (IAQ) requirements, and extending Title 24 Part 6 to apply to healthcare facilities. The 2019 Building Energy Efficiency Standards were approximately 53 percent more than the 2016 Title 24 Energy Standards for residential development and approximately 30 percent more efficient for non-residential development. The 2022 standards, which were adopted in August 2021, went into effect January 1, 2023. The 2022 Building Energy Efficiency Standards focuses on establishing or expanding standards for electric heat pumps, for single-family homes to be electric-ready, for solar photovoltaic system and battery storage, and for ventilation systems (CEC 2021).

Center for Biological Diversity v. California Department of Fish and Wildlife

In its decision in Center for Biological Diversity v. California Dept. of Fish and Wildlife (Newhall) 62 Cal.4th 204 (2015), the California Supreme Court set forth several options that lead agencies may consider for evaluating the cumulative significance of a proposed project's GHG emissions:

1. A calculation of emissions reductions compared to a BAU scenario based upon the emissions reductions in CARB's Scoping Plan, including examination of the data to determine what level of reduction from BAU a new land use development at the proposed location must contribute in order to comply with statewide goals.
2. A lead agency might assess consistency with AB 32's goals by looking to compliance with regulatory programs designed to reduce GHG emissions from particular activities.
3. Use of geographically specific GHG emission reduction plans to provide a basis for tiering and streamlining of project-level CEQA analysis.
4. A lead agency may rely on existing numerical thresholds of significance for GHG emissions, though use of such thresholds is not required.

Regional

Bay Area Air Quality Management District: 2017 Clean Air Plan

On April 19, 2017, the BAAQMD adopted the 2017 Clean Air Plan: Spare the Air, Cool the Climate (2017 Clean Air Plan), which updates the adopted Bay Area 2010 Clean Air Plan, and continues to provide the framework for assuring that the NAAQS and CAAQS are attained and maintained in the Bay Area. In addition to addressing criteria air pollutant concentrations and

public exposure to toxic air contaminants, the 2017 Clean Air Plan lays the groundwork for a long-term effort to reduce Bay Area GHG emissions 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050, consistent with GHG reduction targets adopted by the State of California.

As opposed to focusing solely on the nearer 2030 GHG reduction target, the 2017 Clean Air Plan makes a concerted effort to imagine and plan for a successful and sustainable Bay Area in the year 2050. In 2050, the Bay area is envisioned as a region where:

- Energy efficient buildings are heated, cooled, and powered by renewable energy;
- The transportation network has been redeveloped with an emphasis on non-vehicular modes of transportation and mass-transit;
- The electricity grid is powered by 100 percent renewable energy; and
- Bay Area residents have adopted lower-carbon intensive lifestyles (e.g., purchasing low-carbon goods in addition to recycling and putting organic waste to productive use).
- The 2017 Clean Air Plan includes a comprehensive, multipollutant control strategy that is broken up into 85 distinct measures and categorized based on the same economic sector framework used by CARB for the AB 32 Scoping Plan Update. The accumulation of all 85 control measures being implemented support the three overarching goals of the plan. These goals are:
- Attain all state and national air quality standards;
- Eliminate disparities among Bay Area communities in cancer health risk from toxic air contaminants; and
- Reduce Bay Area GHG emissions to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050.

Local

General Plan

The following goals, policies, and actions are related to reducing GHG emissions. These items are excerpted from the Circulation and Public Safety elements in the General Plan.

Goal C-2 - Wherever possible, reduce traffic congestion in Hillsborough, especially around schools and at main entrances to Hillsborough.

> *Policy C-2.5* - Encourage the public and private schools to expand ridesharing activities to help reduce school-generated vehicle traffic around the schools.
>
> *Action C-2.3* - The Town will work with the School District and local private schools to develop a network for parents to facilitate organizing carpools as well as encouraging safe walking and biking.

Goal C-6 - Promote public health and safety by working towards improved air quality.

> *Policy C-6.1* - Cooperate with regional agencies to promote air quality.

Goal PS-5 - Protect the community from human-caused hazards, such as criminal activity, air pollution and hazardous materials.

> *Policy PS-5.2* - Cooperate and participate in regional air quality management planning, programs and enforcement measures.

Action PS-5.3 - The Town will continue to promote energy conservation by the public and private sectors. New development and remodeling will be encouraged to incorporate features that minimize energy use, such as planting trees along the south and west-facing sides of buildings; using solar heating; installing energy efficient lighting and heating/cooling systems, as well as increased insulation; and replacing older appliances with energy efficient models. The Town will also incorporate energy saving design features and devices in Town property, when appropriate.

Hillsborough Municipal Code

Municipal Code Chapter 15.10 (Energy Code) requires that all buildings and construction within town limits adhere to the California Energy Code. Chapter 15.18 (Recycling of Construction and Demolition Debris) requires applicants for demolition and building permits to submit a waste reduction plan for Town approval. Chapter 15.19 (Green Building Regulations) provides measures to minimize the use of energy, water, and other natural resources in the construction of new homes. Chapter 15.29 (Water Conservation in Landscape Requirements) requires new construction to incorporate measures for water-efficient landscapes and irrigation systems.

On January 9, 2023, the Town adopted an all-electric preferred, with mixed fuel option, Reach Code Ordinance (Ordinance 788, Municipal Code Chapter 15.10). The Town's Reach Code requires all new single-family residential construction to utilize electric space heating and electric water heating. Natural gas ranges/ovens and clothes dryers are permitted, but the electrical infrastructure (i.e., conduit, plugs, etc.) to support all-electric appliances in the future also have to be installed. The Town's Reach Code applies to all residential development, including accessory dwelling units (ADUs).

Climate Action Plan

In 2010, the Town of Hillsborough adopted a Climate Action Plan (CAP) to identify methods to reduce GHG emissions in an effort to meet the requirements of Assembly Bill 32. The CAP includes programs related to regional energy efficiency, residential green building, water conservation, expanding graywater systems and new technologies for graywater systems, and new residential recycling service, among others.

4.7.3 Significance Thresholds

Per the CEQA Guidelines, implementation of the project would have a significant impact related to GHG emissions if it would:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of greenhouse gases.

The BAAQMD provides guidance on assessing and mitigating GHG emissions impacts. In April 2022, the BAAQMD adopted new CEQA thresholds for evaluating climate impacts from land use projects and plans (BAAQMD 2022). As described in Section 4.2.3, the proposed Focused GPU is a planning-level document that does not authorize or approve any specific project and, therefore, is analyzed using the BAAQMD's plan-level guidance. Future development projects supported by the Housing Element could be analyzed using the project-level guidance

contained in BAAQMD's CEQA Air Quality Guidelines. This guidance informs the evaluation of GHG emissions impacts presented below. The BAAQMD's plan- and project-level thresholds of significance are summarized in Table 4.7-4 and Table 4.7-5, respectively. The project-level thresholds are provided for information purposes only.

Table 4.7-4: BAAQMD Plan-Level GHG Thresholds of Significance

Pollutant	Plan-Level Thresholds of Significance for Operations	
	Option A	Option B
GHG	Meet the State's goals to reduce emissions to 40 percent below 1990 levels by 2030 and carbon neutrality by 2045; or	Be consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b).
Source: BAAQMD 2023		

Table 4.7-5: BAAQMD Project-Level GHG Thresholds of Significance

Pollutant	Project-Level Thresholds of Significance for Operations	
	Option A	Option B
GHG	Projects must include, at a minimum, the following project design elements: Project buildings will not include natural gas appliances or natural gas plumbing (in both residential and non-residential projects). Project buildings will not result in any wasteful, inefficient, or unnecessary energy usage as determined by the analysis required under CEQA (PRC Section 21100(b)(3)) and the State CEQA Guidelines (Section 15126.2(b)). Project-generated VMT will be reduced below 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: Residential projects: 15 percent below the existing VMT per capita. Office projects: 15 percent below the existing VMT per employee. Retail projects: No net increase in existing VMT. The project will comply with the off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.	Be consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b).
Source: BAAQMD 2023		

4.7.4 Impacts and Mitigation Measures

This section describes potential impacts related to GHG emissions and recommends mitigation measures, as needed, to reduce significant impacts.

The proposed Project consists of updates to the existing 2014 - 2022 Housing Element to reflect the 6th cycle 2023 – 2031 housing assignments. In addition, associated amendments to the Land Use Element and General Plan Land Use Map, Open Space and Conservation Element, and Public Safety Element; amendments to Title 17 (Zoning) of the Hillsborough Municipal Code, and amendments to the Hillsborough Zoning Map are proposed for consistency of all Town documents, codes, and regulations. These associated amendments are generally described in sections 3.3.9 through 3.3.12 in the Project Description and would not result in environmental impacts to greenhouse gases. Therefore, they are not discussed further in this chapter. The impact analysis focuses on the residential development that would be facilitated by the Draft 2023 – 2031 Housing Element.

Impact GHG-1 –Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, and would conflict with an applicable plan, policy, or regulation adopted for the purposes of reducing GHG emissions. *[Threshold of Significance (a) and (b)]*

Implementation of the proposed Focused GPU could result in construction and operational activities that generate GHG emissions. As described in more detail below, the GHG emissions that could be generated by the increase in housing facilitated by the project would not be consistent with BAAMD-recommended CEQA thresholds of significance and the CARB Scoping Plan, even with the inclusion of feasible mitigation measures.

As described in the Project Description (see Chapter 3), the proposed Focused GPU could result in an additional 478 single-family dwelling units / ADUs, approximately 127 new multi-family residential units, and approximately 1,392 new residents. Based on the Town's historical land use practices, most of these units would be interspersed throughout the Town's jurisdictional boundaries.

Adoption of the proposed Focused GPU would not directly result in the construction of any residential development or infrastructure; however, future development facilitated by the Draft 2023 – 2031 Housing Element would result in construction related GHG emissions. Construction activities would generate GHG emissions primarily from fuel combustion in equipment during site preparation, grading, building construction, paving, and architectural coating activities and from worker, vendor, and haul trips to and from future development projects. Such activities could occur intermittently at different sites within the Planning Area over the next approximately 15 to 20 years. The BAAQMD does not maintain thresholds of significance for assessing the significance of construction emissions, noting that GHG emissions from construction are a small portion of a project's lifetime GHGs. Accordingly, potential construction GHG emissions are not estimated in this EIR.

The proposed land uses envisioned by the Housing Element would result in operational GHG emissions from the same sources as existing land uses in the Town, including the mobile, area, energy, and other sources described in Section 4.7.1. Mobile sources, including vehicle trips to and from land uses within the Town, would result primarily in emissions of CO_2, with emissions

of CH_4, NO_2, and refrigerants also occurring in minor amounts. In addition to mobile sources, GHG emissions would also be generated from natural gas usage, electricity use, water conveyance and use, wastewater treatment, solid waste disposal, and refrigeration technologies. Natural gas use would result in the emission of two GHGs: CH_4 (the major component of natural gas) and CO_2 (from the combustion of natural gas). Electricity use associated with both the physical usage of the development, as well as the energy needed to transport water/wastewater, would result in the production of GHGs if the electricity is generated through non-renewable sources (i.e., combustion of fossil fuels). Solid waste generated by land uses within the town would contribute to GHG emissions in a variety of ways. Landfilling and other methods of disposal use energy when transporting and managing the waste and produce CH_4 from the decomposition of organic materials. Refrigeration technologies employ various HFCs and PFCs that can leak from systems into the atmosphere.

Potential operational GHG emissions resulting from the residential land uses proposed by the Focused GPU were estimated using CalEEMod, Version 2022.1. The modeling is based on default data assumptions contained in CalEEMod, with the following project-specific modifications:

- **Land Use Development:** Approximately 4,355 dwelling units were modeled. The approximately 3,750 existing units retained the same assumptions (e.g., landscaping, acreage, etc.) as the current land use modeling discussed in Section 4.7.1. The approximately 478 units proposed by the ADU, pipeline projects, vacant opportunity and subdivision / lot split strategies were modeled at single-family residences; the default acreage generated for the ADUs were removed from the modeling, since these units would be constructed on existing single-family residential properties accounted for in the current operational modeling. The approximately 127 multi-family residential dwelling units proposed by the project were modeled as low-rise apartment buildings.
- **Energy Use:** The additional housing units proposed by the Housing Element Update were modeled as being in compliance with the Town's current Reach Codes. CalEEMod's default energy assumptions were utilized for the new development (single-family residential, ADUs, and multi-family residential); however, the natural gas energy that would have been used for water and space heating (approximately 49 percent and 40 percent of natural gas consumption, respectively) assumed by CalEEMod were transitioned to electricity. Cooktops, ovens, and clothes dryers were assumed to continue to be powered by natural gas, as currently permitted by the Town's Municipal Code. Natural gas consumption was converted to electricity at a rate of approximately 3.412 kBtu per kWh.
- **Mobile Sources:** Trip generation rates and trip distances were adjusted using the same methodology described in Section 4.7.1 to reflect the trip generation and VMT estimates prepared for the project (Kittleson and Associates, 2023). The proposed project is anticipated to generate approximately 44,597 trips per day in 2040 if the Focused GPU were adopted.

The total unmitigated GHG emissions estimated to occur under projected 2040 growth conditions are shown below in Table 4.7-6 and compared against the potential GHG emissions that could exist in 2040 if the Focused GPU were not approved.

Table 4.7-6: Unmitigated 2040 GHG Emissions With and Without Project			
	2040 GHG Emissions (MTCO2e / Year)		
Source	Without Project(A)	With Project	Net Change(B)
Mobile	30,528.0	34,172.0	+3,644.0
Area	111.1	133.4	+22.3
Energy	15,109.0	15,250.0	+141.0
Water	185.1	214.9	+29.8
Waste	831.3	966.6	+135.3
Refrigerants	8.7	9.9	+1.2
Total GHG(C)	46,773	50,747.0	+3,973.8
Number of Town Residents	11,410	12,802	+1,392
MTCO2e/yr/Capita	4.10	3.96	-0.14

Source: MIG 2023 (see Appendix C).

(A) See Table 4.7-3 for existing GHG emissions in the Planning Area.

(B) As described in Section 4.7.2, the State has adopted a number of plans and regulations that could reduce future GHG emissions, such as the LCFS and RPS programs. The 2040 emissions estimates with and without the project do not take credit for future emissions reductions that may occur due to the implementation of State Programs. This is because the reductions realized from these programs would, in general, apply equally to both existing and proposed land uses (e.g., LCFS reductions would affect the carbon content of fuels used by both existing and proposed land uses). Therefore, even though the total amount of GHG emissions could be lower than estimate, the net change in emissions is assumed to stay approximately the same as show in this table for most sources. The exception to this could be building electrification standards, which would reduce emissions from new buildings but not necessarily existing buildings.

(C) Totals may not equal due to rounding.

As shown in Table 4.7-6, the Town's residential and other land uses would emit approximately 50,747 MTCO2e annually by 2040 under the Focused GPU, an increase of 3,974 $MTCO_2e$ above the emissions levels estimated to occur in 2040 without the Focused GPU. On a per capita efficiency basis, however, the Focused GPU would result in a nominal increase in efficiency within the Town (i.e., lead to a lower quantity of GHG per person), as evidenced by efficiencies of 4.10 and 3.96 $MTCO_2e$/yr/capita for without project and with project, respectively (i.e., with project emissions would be 0.14 MTCO2e/yr/capita more efficient). This nominal increase in efficiency would not however, be consistent with near- or long-term State GHG reduction goals, including the State's goal to reduce GHG emissions 40 percent below 1990 levels by 2030 and achieve carbon neutrality by 2045 as discussed in greater detail below.[28]

[28] According to CARB's 2022 Scoping Plan, the State met the GHG emissions reduction target established in AB 32 – a return of GHG emissions to 1990 levels by 2020 – in 2016. Thus, for the purposes of a rough comparison it is reasonable to assume that the 2020 GHG emissions shown in Table 4.7-3 are approximately equal to 1990 emissions levels. As shown in Table 4.7-4 and Table 4.7-5, total GHG emissions in 2040 with the Housing Element (50,717 MTCO2e) would be approximately 11.3 percent lower than 2020 emissions levels (57,209 MTCO2e). The GHG emissions efficiency in 2040 with the Housing Element (3.96 MTCO2e/yr/capita) would be approximately 21 percent lower than the 2020 GHG emissions efficiency (5.01 MTCO2e/yr/capita). This provides further context that the GHG

The primary source of GHG emissions in the Town under both 2040 emissions scenarios would be mobile sources. With the Focused GPU, mobile sources would account for approximately 67 percent of total annual 2040 GHG emissions (34,172 $MTCO_2e$/year out of 50,747 $MTCO_2e$/year). These mobile source emission estimates are based on regulations in place when CARB's EMFAC2021 v1.0.1 model was developed (April 2021); it does not take into account additional emission reductions that are anticipated to be realized in the mobile sector due to new regulations and state goals that have since been set, including the Advanced Clean Cars II program that requires 35 percent of new light duty vehicle sales be zero emission or plug in hybrid electric vehicles in 2026, 68 percent in 2030, and 100 percent in 2035.

The next highest source of GHG emissions under both emissions scenarios would be energy sources which, cumulatively (i.e., existing dwelling units plus those proposed by the Focused GPU) would represent approximately 30 percent of total annual GHG emissions. These emissions are directly attributable to natural gas consumption as, pursuant to the State's RPS goals (see Section 4.7.2) and assumptions contained in CalEEMod for PCE's renewable mix in 2040, all electricity emissions would be negated, since 100 percent of PCE's electricity supplied in 2040 would come from renewable sources. It should be noted that while natural gas is the driver of energy emissions, the contribution from the new dwelling units proposed by the Housing Element comprises less than 5 percent of the overall increase between GHG emissions with the Focused GPU and those without the focused GPU in 2040.

The BAAQMD recommends lead agencies evaluate plan-level GHG emissions impacts by determining whether plan adoption would meet the State's goals to reduce emissions to 40% below 1990 levels by 2030 and achieve carbon neutrality by 2045. As shown in Table 4.7-6, the proposed Focused GPU, if adopted, would slightly improve GHG emissions efficiency, but not at a magnitude necessary to meet the State's 2030 GHG reduction target (reduce GHG emissions 40 percent below 1990 levels) or demonstrate substantial progress towards meeting the State's 2045 carbon neutrality goals. This is considered a potentially significant impact.

The Town's existing General Plan and Municipal Code includes goals, policies, and requirements that encourage improved air quality and reductions in GHG emissions. For example, as shown under Section 4.7.2, the Town coordinates with regional agencies to promote air quality (Policy C-6.1) and cooperates and participates in regional air quality management planning, programs, and enforcement measures (Policy PS-5.2). The land uses proposed by the Housing Element would also benefit from existing General Plan Action PS-5.3, which calls upon the Town to improve air quality and reduce GHG emissions through the implementation of energy efficiency measures. The new residential dwelling units would also benefit from compliance with the Town's Reach Code, which prohibits the use of natural gas appliances for water and space heating. The new land uses could, however, still use some natural gas for the time being for cooking (stovetops and ovens) and clothes dryers.

Despite the existence and implementation of existing policies, programs, and code requirements adopted by the Town for the purposes of reducing GHG emissions, the GHG emissions associated with the proposed project would continue to be inconsistent with state-wide GHG emission reduction goals and therefore, represents a potentially significant impact. Mitigation

emissions associated with the Focused GPU would not be consistent with State GHG reduction goals (i.e., because the emissions under the Focused GPU would not meet or exceed a 40 percent below 1990 levels by 2030 or put the Town on track to achieve carbon neutrality by 2045).

the Town would implement to reduce GHG emissions is presented following the discussion, below, of project consistency with plans, policies, and regulations that have been adopted for the purposes of reducing GHG emissions.

2022 CARB Climate Change Scoping Plan

As discussed under Section 4.7.2, the 2022 Scoping Plan is CARB's primary document used to ensure State GHG reduction goals are met. The plan identifies an increasing need for coordination among State, regional, and local governments to achieve the GHG emissions reductions that can be gained from local land use planning and decisions. The major elements of the 2022 Climate Change Scoping Plan, which is designed to achieve the State's 2030 and 2045 GHG reduction goals, are listed in Section 4.7.2.

Nearly all of the specific measures identified in the 2022 Climate Change Scoping Plan would be implemented at the state level, with CARB and/or another state or regional agency having the primary responsibility for achieving required GHG reductions. The Project, therefore, would have limited ability to directly conflict with any of the specific measures identified in the 2022 Scoping Plan. Nonetheless, Appendix D to the 2022 Scoping Plan provides specific criteria to help Lead Agencies identify residential and mixed-use projects that are clearly consistent with the State's long-term GHG emission reduction goals. These criteria are presented below in Table 4.7-7.

Table 4.7-7: 2022 Scoping Plan Qualitative Criteria - Residential and Mixed-Use Projects

Priority Area	Key Project Attribute
Transportation Electrification	Provides electric vehicle (EV) charging infrastructure that, at a minimum, meets the most ambitious voluntary standard in the California Green Building Standards Code (CalGreen Code) at the time of project approval.
VMT Reduction	Is located on infill sites that 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).
	Does not result in the loss or conversion of natural and working lands.
	Consists of transit-supportive densities (minimum of 20 residential dwelling units per acre), or Is in proximity to existing transit stops (within a half mile), or Satisfies more detailed and stringent criteria specified in the region's SCS.
	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.
	At least 20 percent of units included are affordable to lower-income residents.

Table 4.7-7: 2022 Scoping Plan Qualitative Criteria - Residential and Mixed-Use Projects	
Priority Area	**Key Project Attribute**
	Results in no net loss of existing affordable units.
Building Decarbonization	Uses all-electric appliances without any natural gas connections and does not use propone or other fossil fuels for space heating, water heating, or indoor cooking.

As shown in Table 4.7-7, the 2022 Scoping Plan contains criteria that all projects can implement (e.g., using all-electric appliances without any natural gas connections and providing EV parking infrastructure consistent with the most stringent CalGreen Code voluntary standards) but also includes criteria that are directly applicable to a project's location (e.g., located on infill site, does not result in the conversion of natural and working lands, etc.) and the type of land use being proposed (e.g., consists of transit-supportive densities). Given the low-density residential nature of development in Hillsborough (e.g., away from existing transit stops), as well as the housing units identified as part of the Focused GPU (i.e., mainly single-family residential), the proposed project would generally be inconsistent with the land use types and locations that CARB considers to be clearly consistent with the State's future GHG emission reduction goals, including the loss or conversion of natural and working lands. This is considered a potentially significant impact.

Plan Bay Area 2050

As described in Section 4.7.2, Plan Bay Area 2050 is a long-range planning document developed by ABAG and MTC to reduce GHG emissions from transportation. Plan Bay Area 2050 aims to reduce 2035 per capita GHG emissions from cars and light-duty trucks by 20 percent compared to a 2005 baseline. There is currently no recent data on the amount of GHG emissions generated by car and light duty truck trips generated by the Town in 2005; however, as shown in Table 4.7-3 and Table 4.7-6, Year 2040 mobile source GHG emissions with the proposed Housing Element are estimated to be approximately 11.6 percent less than existing Year 2020 mobile source GHG emissions. Most of this reduction in mobile source emissions would be due to improvements in fuel efficiency and other State and federal requirements that cannot be credited towards Plan Bay Area per capita GHG emissions reductions requirements. In addition, as described in Section 4.14, Impact TRANS-2, in Year 2040 the average home-based VMT/resident would be higher with the Housing Element (20.7 VMT/resident) than without the Housing Element (20.4 VMT/resident). The Housing Element's 2040 VMT per capita would also be substantially higher (i.e., approximately 57 percent greater) than the VMT per capita threshold for San Mateo County of 13.2 VMT/resident. Finally, the project would slightly increase cumulative total VMT in the county. Overall, the VMT analysis indicates the Housing Element would not reduce VMT/resident. Therefore, it is possible that the implementation of the Housing Element could impede the ability to meet regional transportation GHG reduction goals established by Plan Bay Area 2050. This impact is considered potentially significant.

Town of Hillsborough Climate Action Plan

The Town's CAP, adopted in 2010, outlined the Town's strategy for reducing GHG emissions through Year 2020. The proposed project has an analyzed buildout horizon year of Year 2040,

approximately two decades after the CAP's planning horizon year. Although the CAP does not address emissions beyond 2020, new development accommodated by the proposed Housing Element would benefit from actions taken pursuant to the CAP (e.g., adoption of an efficient landscape ordinance). The proposed Housing Element would not conflict with the Town's CAP.

Summary and Conclusion

As discussed above, development of the new residential units facilitated by adoption of the Housing Element Update would generate GHG emissions that would have the potential to conflict with state-wide GHG reduction goals, including the State's goal for becoming carbon neutral by 2045. The growth facilitated by adoption of the Housing Element Update would also result in GHG emissions that would conflict with the CARB 2022 Scoping Plan and MTC/ABAG Plan Bay Area 2050. Therefore, the Town would have to implement Mitigation Measures GHG-1a through GHG-1e in order to reduce GHG emissions associated with future development facilitated by adoption of the Housing Element Update. These measures, described below, would reduce GHG emissions from transportation and building energy use, two of the largest sources of potential GHG emissions associated with the additional land uses contained in the Housing Element Update.

- Mitigation Measure GHG-1a would require the Town to update its Climate Action Plan to reflect the additional development proposed by the Project and set forth a new / revised strategy for addressing the additional GHG emissions that would be associated with additional development and the loss of sequestration associated with some development on currently undeveloped lands. In the interim, the Town would implement Mitigation Measures GHG-1b and GHG-1c.
- Mitigation Measure GHG-1b would require the Town to evaluate the feasibility of adopting an ordinance that would mandate all new residential and/or non-residential construction in the Town meet Zero Net Energy (ZNE) standards. Unlike embedded GHG emissions associated with electricity consumption, which can be reduced by supplying the electricity grid with more electricity produced from carbon-free sources, it is difficult to directly reduce GHG emissions associated with on-site natural gas consumption without limiting its use. Reaching ZNE in new development, therefore, could reduce GHG emissions from natural gas consumption through limited use, increased renewable energy generation, and/or other means.
- Mitigation Measure GHG-1c would require the Town to prohibit the use of natural gas plumbing and appliances in housing unit sites, including natural gas stoves, ranges, and clothes dryers, until such time as the Town adopts a ZNE ordinance and/or and updated Climate Action Plan.
- Mitigation Measure GHG-1d would require new residential development to be constructed to comply with the most stringent voluntary standards established for EV charging infrastructure. This could increase the likelihood of residents in the Town purchasing and using ZEVs, since they would be able to charge the vehicles at home as opposed to an off-site location. This in turn would reduce mobile source GHG emissions.
- Mitigation Measure GHG-1e would require site specific evaluation of a project's VMT and require it to reduce VMT (and the GHG mobile source emission associated with it).

It is not possible at this time to quantify the GHG emissions reductions that could be realized through the implementation of Mitigation Measures GHG-1a to GHG-1e for several reasons.

First, it is unknown how many projects would be actually subject to Mitigation Measures GHG-1b to GHG-1e. Second, it is uncertain at this time if the ZNE provisions called out in Mitigation Measure GHG-1b would be adopted by the Town or what GHG emissions reductions. For example, with regard to adopting a ZNE ordinance, the electrification of homes will have to be coupled with grid harmonization strategies, such as consumer owned storage, which may not be cost effective at this time. In addition, the specific GHG emissions reduction measures associated with Mitigation Measures GHG-1c through GHG-1e would be dependent on factors that are not known at this time, including the number of projects subject to review, building types/intensities, and each individual project's specific site and trip generation characteristics.

Finally, while it is anticipated that the Town would be able to identify a new / revised strategy for addressing the GHG emissions associated with residential growth facilitated by the project under the implementation of Mitigation Measure GHG-1A, and align the Town's emissions with state-wide and local targets for 2030 and 2045, it cannot be definitively known or stated at this time that such policy considerations would be able to achieve the intended targets. Additional consideration would likely need to be given to expand carbon sequestration efforts as a means to offset increases in GHG emissions associated with the growth proposed by the project. Since the GHG emissions associated with the implementation of the Housing Element would not meet State GHG reduction goals and could conflict with plans adopted for the purposes of reducing GHG emissions (e.g., 2022 Scoping Plan), and since the GHG reductions attributable to Mitigation Measures GHG-1a to GHG-1e cannot be definitively assessed at this time, this impact would be **significant and unavoidable**.

Mitigation Measures

Impact GHG-1: Development of the new residential units facilitated by adoption of the Housing Element Update would generate GHG emissions that would have the potential to conflict with state-wide GHG reduction goals, including the State's goal for becoming carbon neutral by 2045.

Mitigation Measure GHG-1a: Update Climate Action Plan. Within two years of adoption of the Project, the Town shall prepare an updated Climate Action Plan that:

1. Quantifies greenhouse gas emissions, both existing and proposed, over a specified time period. The time period forecasted shall be no less than the Year 2045. Additional, forecasted years (e.g., 2030, 2035, etc.) may be included. The existing greenhouse gas emission inventory shall include an evaluation of the Town's Natural and Working Lands.

2. Identifies annual, community-wide greenhouse gas emission reduction targets (i.e., in MTCO2e) and/or efficiency targets (i.e., in MTCO2e per service population and/or capita) that align the Town's emissions with legislatively adopted State-wide greenhouse gas reduction targets (e.g., SB 32) for 2030 and goal of being carbon neutral by 2045, consistent with Executive Order B-55-18.

3. Specifies measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented, would collectively achieve the specified annual, community-wide greenhouse gas emission reduction targets and/or efficiency targets. The Town's strategy shall include strategies that address the carbon sources and sinks associated with the Town's Natural and Working Lands.

4. Establishes a mechanism to monitor the plan's progress toward achieving its community-wide greenhouse gas emission reduction targets and/or efficiency targets, and require an amendment if the Climate Action Plan is not achieving specified levels.

Mitigation Measure GHG-1b: Consider Adoption of a Zero Net Energy Ordinance. Within one year of the adoption of the Focused GPU the Town shall complete an evaluation on the feasibility of adopting an ordinance that amends the Town's Municipal Code to require all new residential development subject to Title 24, Part 6 of the California Building Code to achieve Zero Net Energy (ZNE) standards. If the Town finds ZNE technology, programs, and/or other strategies are feasible and cost-effective, the Town shall adopt a ZNE ordinance as expeditiously as possible given Town resources. As defined by the California Energy Commission (CEC), ZNE standards require the value of the net energy produced by project renewable energy resources to equal the value of the energy consumed annually by the project, using the CEC's Time Dependent Valuation. In the event the Town adopts a ZNE ordinance, Mitigation Measure GHG-1c would no longer apply to housing site projects in the Town. This Mitigation Measure may no longer apply if, after adoption of an updated qualified Climate Action Plan as required by Mitigation Measure GHG-1a, a ZNE ordinance is found to be unnecessary for the Town to align its GHG emissions with future statewide greenhouse gas emissions goals, including being carbon neutral by 2045.

Mitigation Measure GHG-1c: Prohibit Natural Gas Plumbing and Appliances in New Housing Sites. The Town shall prohibit natural gas plumbing and the use of all natural gas appliances such as cook tops, water heaters, and space heaters in all new housing site developments, with the following exceptions:

- Newly constructed buildings with a valid planning entitlement or other development agreement approved prior to the date of certification of this EIR.
- It can be demonstrated there is no commercially available technology capable of meeting the specific appliance or building system application due to specific economic, technical, logistical, or other factors associated with the development site.

Projects subject to the above exceptions shall provide the necessary infrastructure to support future electrification of appliances and building systems, consistent with the requirements identified in the Town of Hillsborough Municipal Code Chapter 15.10, as in effect September 6, 2023. This prohibition on natural gas plumbing and natural gas appliances shall cease if and when 1) the City adopts a ZNE ordinance per Mitigation Measure GHG-1b or 2) adopts an updated, qualified Climate Action Plan pursuant to Mitigation Measure GHG-1a and a natural gas prohibition on some or all appliances/uses is determined to be unnecessary for the purposes of aligning the Town's emissions with the state's long-term greenhouse gas emission reduction goals.

Mitigation Measure GHG-1d: Residential Electric Vehicle Charging Requirements

Future residential development facilitated by the Project that includes new or additional parking facilities must conform with the Tier 2 electric vehicle charging requirements in the latest edition of the California Green Building Standards Code (CalGreen) in effect at the time the building permit application is submitted to the Town. Currently, the 2022 CalGreen code, Section A4.106.8, Electric Vehicle Charging for New Construction, require the following measures to facilitate the future installation and use of electric vehicle chargers:

- New one and two-family dwellings and townhouses with attached private garages include a dedicated 208/240-volt branch circuit rated at 40 amperes minimum.
- New multi-family dwellings provide 40 percent of the total number of parking spaces on a building site be electric vehicle charging spaces capable of supporting future electric vehicle supply equipment.

Mitigation Measure GHG-1e: VMT Reduction Requirements

Future residential development facilitated by the Project shall be required to achieve a VMT significance threshold of 15 percent below the countywide average residential VMT per capita. For individual development projects that do not achieve VMT significance thresholds, applicants shall submit documentation that demonstrates how the necessary VMT reductions will be achieved.

4.7.5 References

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4.8 Hazards and Hazardous Materials

This section describes the existing hazards and hazardous materials within the Planning Area. It includes a description of the regulatory framework and analyzes impacts that could result from the implementation of the proposed Project (i.e., evaluates the potential for impacts related to hazardous and hazardous materials that could result from implementation of the proposed Focused GPU (the Project)). For continuity of the impact analysis, the Hazards Threshold of Significance *(g) ("Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires")* is addressed in Chapter 4.16 Wildfire.

4.8.1 Environmental Setting

A "hazardous material" is defined by the California Health and Safety Code Section 25501 as "any material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment." Products as diverse as gasoline, paint solvents, film solvents, household cleaning products, refrigerants, and radioactive substances are categorized as hazardous materials. What remains of hazardous material after use, or processing, is considered a hazardous waste.

Hazardous materials can enter the air, soil, and surface water and can also infiltrate the groundwater, in some cases contaminating entire groundwater systems. There are currently no known regional plumes of contaminated groundwater within the Planning Area, according to the County of San Mateo Health Services Agency and the State Water Board.

Hazardous Materials

Due to Hillsborough's history of predominately residential and public facility (schools and Burlingame Country Club) land uses, hazardous materials that may be present in the soils and/or present in groundwater would be limited to hazardous materials used in residential construction, household cleaning and maintenance, landscape maintenance, and heating or fuel oil storage, typically from leaking underground storage tanks. The State Water Board GeoTracker database lists recorded 33 leaking underground storage sites in Hillsborough. Of these, 32 are closed and one is designated as "open – site assessment," which means that additional activities are being conducted, such as investigating or evaluating potential risks. However, this site is not included on the State's Cortese List, as discussed below.

The State Department of Toxic Substances Control (DTSC) is responsible for maintaining a list of sites with active hazardous material users and/or generators and sites with historical or current environmental contamination, known as the Cortese List (see below under Section 4.1.2 Regulatory Setting). A search of DTSC Cortese list information resources indicates no hazardous waste and substance sites identified on the DTSC EnviroStor database or any other database with the exception of the State Water Board GeoTracker database, which indicates 24 listings for leaking underground storage tanks (LUST) sites (also noted previously) that are included on the Cortese List. All 24 of these Cortese listed sites are designated "completed – case closed."

Household Hazardous Waste (HHW)

San Mateo County's Household Hazardous Waste (HHW) Program helps residents reuse, recycle, or otherwise responsibly manage residential hazardous waste for free. County residents may drop-off a full range of HHW at collection events year-round every Thursday, Friday, and Saturday (except major holiday weekends), or residents may contact the HHW Program by phone or online to make a drop-off appointment. In addition, different curbside options may be available, depending on the item, such as household batteries, used motor oil and filters, and compact fluorescent lights. Also, many pharmacies (including all CVS locations) and local police departments provide take-back of unwanted medicines at no charge.

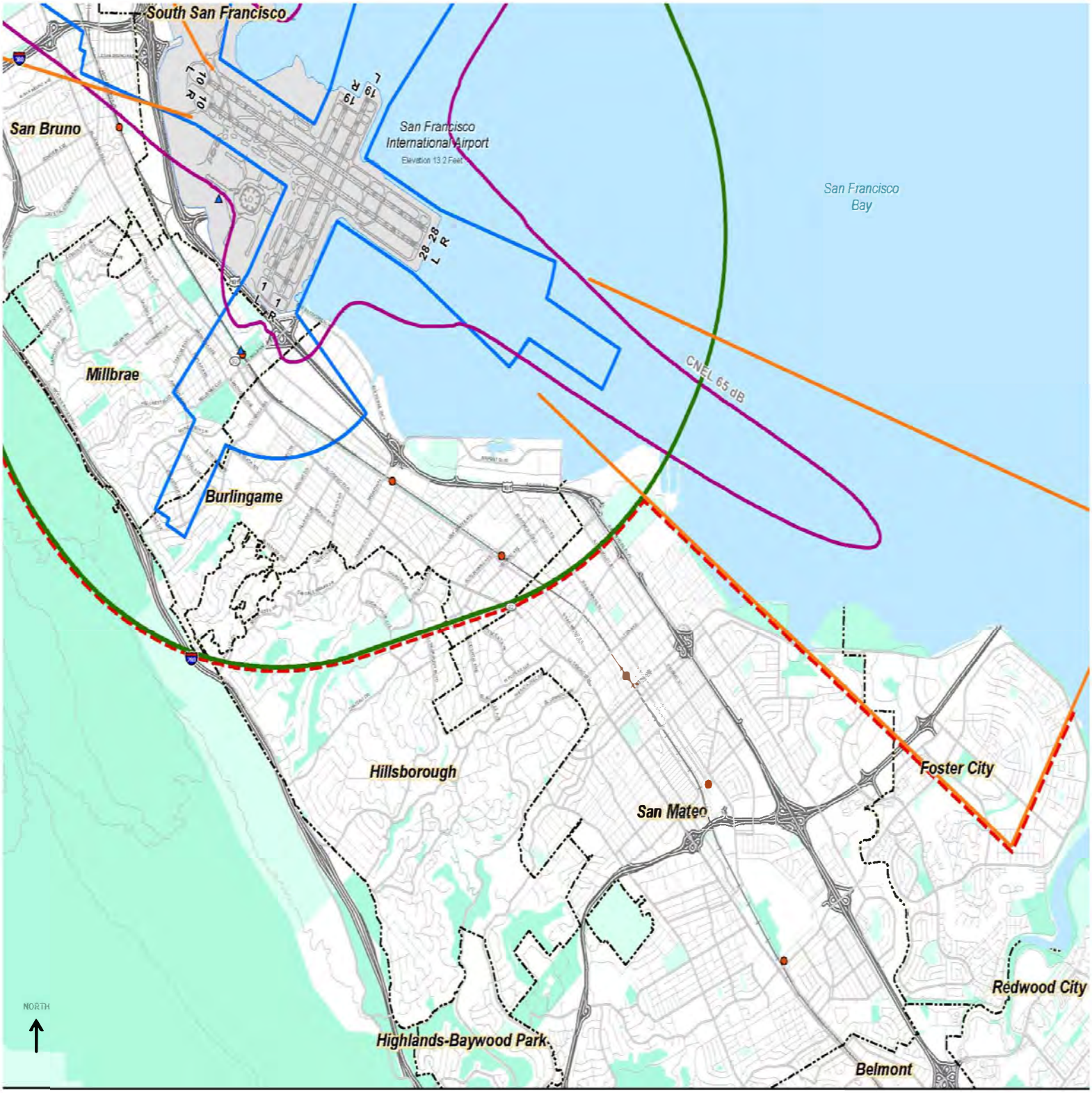
Airport Hazards

The San Francisco Airport (SFO) is approximately 1.8 miles northeast of the Town's northern boundary; the entire Town is located in Airport Influence Area A and a portion roughly north of Chateau Drive is located in SFO Airport Influence Area B. The San Carlos Airport is approximately 4.6 miles southeast of the Town's southern borders and a portion of the Town southeast of Chateau Drive/Ralston Avenue is within the San Carlos Airport's Area of Influence Boundary A; no portion of the Town is located within San Carlos Airport's Area of Influence Boundary B. Figure 4.8-1 shows the Airport Influence Area B boundary for SFO.

The City/County Association of Governments of San Mateo County (C/CAG) serves as the State-mandated Airport Land Use Commission and is responsible for promoting land use compatibility around the County's airports in order to minimize public exposure to excessive airport noise and safety hazards. The primary means by which this is accomplished is through a comprehensive land use plan (CLUP), which is a State-mandated document that addresses airport/land use compatibility related to proposed land use policy actions within the environs of an airport. The CLUP for San Francisco International Airport was adopted by C/CAG in 2012; the CLUP for San Carlos Airport was adopted by C/CAG in 2015.

Emergency Response or Evacuation Plan

In concert with the City of Burlingame, the Town has a comprehensive Emergency Operation Plan (EOP) that establishes policies and procedures and assigns responsibilities to ensure the effective management of emergency operations. The EOP provides information on the emergency management structure of the Town of Hillsborough/City of Burlingame Operational Area, and how the emergency management team is activated. The EOP is fully compliant with and incorporates concepts and processes of the National Incident Management System (NIMS), the Standardized Emergency Management System (SEMS), the National Response Framework (NRF), and the National Disaster Recovery Framework. The EOP establishes the organization of emergency management to address preparedness, response, and recovery for specific conditions related to earthquake, wildland fire, severe weather (including extreme heat or cold, flooding, high winds), energy disruption, hazardous materials emergency, tsunami, terrorism, plane crash, and civil unrest. The Emergency Operations Center (EOC) is jointly staffed by members from both Burlingame and Hillsborough. The primary EOC location for the Town of Hillsborough and City of Burlingame is Burlingame's Public Works Corporation Yard, 1361 N Carolan Ave., Burlingame. The CCFD



Source: City/County Association of Governments of San Mateo, Comprehensive Land Use Plan for the Environs of San Francisco International Airport

LEGEND

- Boundary for Airport Influence Area B
- Outer Boundary of Safety Zones CNEL Contour, 2020 Forecast
- 14 CFR Part 77 Conical Surface
- Outer Boundary of TERPS Approach and OEI Departure Surfaces
- Airport Property
- BART Station
- CALTRAIN Station
- Municipal Boundary
- Railroad
- Freeway
- Road
- Local Park, Golf Course, Cemetary
- Regional Park or Recreation Area
- Open Space

Figure 4.8-1 San Francisco International Airport -- Airport Influence Area B

Preparedness and Prevention Division is responsible for the review, revision, management, and distribution of the EOP.

The Town of Hillsborough uses ZoneHaven (recently renamed “genasys Protect”), a community evacuation interface that allows the public access to real-time status updates and instructions for their evacuation zone. Relevant additional data is fed into the map, showing risks over zones, such as the incident location, wind speeds and directions. This platform is a digital application that can be accessed on a smartphone, computer, or tablet, and that interfaces with real-time GPS-guided traffic maps available through various applications. Residents can follow their local emergency responders on real-time social media platforms and also can sign up for SMC Alert, a free service that sends emergency and non-emergency text and voice messages to email accounts, cell phones, smartphones, tablets, and landline phones (e.g., home, work).

In addition, the Community Emergency Response Team (CERT) program is available to Hillsborough residents by the Central County Fire Department. CERT training provides basic skills for disaster preparedness and basic disaster response skills, such as fire safety, light search and rescue, team organization, and disaster medical operations. CERT members can assist others in their neighborhood or workplace following an event when emergency services are not immediately available. In addition, the Town supports the Hillsborough Neighborhood Network, a volunteer organization of residents established for emergency preparedness and promoting post-disaster resiliency and communication within neighborhoods and with emergency responders.

Wildfire Hazards

Generally, the greatest potential for wildfire hazards occurs in areas adjacent to or containing abundant natural vegetation, which is characteristic of much of the land in the Town. Areas designated as “Very High Fire Hazard Severity” (VHFHS) Zones are found in the southern part of the Town, and most of the Town is in a Wildland Urban Interface area. See Chapter 4.16 Wildfire of the Draft EIR for a discussion of hazards related to wildfire.

4.8.2 Regulatory Setting

Federal

U.S. Environmental Protection Agency (EPA)

Regulates chemical and hazardous materials use, storage, treatment, handling, transport, and disposal practices; protects workers and the community (along with CalOSHA, see below) and integrating the Federal Clean Water Act and Clean Air Act into California Legislation.

Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)

Adopted in 1980, CERCLA was developed to remove contamination of water, air, and land resources from past chemical disposal practices. Also known as the “Superfund Act,” CERCLA contains a list of sites referred to as Superfund sites, where there is an imminent threat to human health. CERCLA collects taxes from the chemical and petroleum industries to clean abandoned or uncontrolled hazardous sites using short term and long-term responses techniques.

The Resources Conservation and Recovery Act (RCRA)

Federal law that regulates hazardous wastes from a 'cradle-to-grave' approach, meaning that all hazardous wastes are tracked and strictly regulated from generation to disposal, and waste generators are required to report use or transport of hazardous wastes to the EPA. Hazardous waste generators range from small producers such as dry cleaners and automobile repair facilities to larger producers such as hospitals and manufacturing operations. The EPA categorizes Small Quantity Generators (SQG) as those facilities that produce between 220.5 and 2,205 pounds (i.e., 100 and 1,000 kilograms) of hazardous waste per month and Large Quantity Generators (LQG) as producing 2,205 pounds or more per month. LQG and SQG facilities are subject to the storage and transportation requirements of RCRA. Facilities producing less than 220.5 pounds of hazardous waste per month are not subject to RCRA.

The Federal Emergency Planning and Community Right-To-Know Act (EPCRA)

Enacted to inform communities and residents of chemical hazards in their area, this Act requires the U.S. EPA maintain and publish a list of toxic chemical releases, known as the Toxic Release Inventory (TRI). Facilities required to report include industrial uses that manufacture, process, or use significant amounts of chemicals. Reporting includes types and amounts of chemicals that are released each year into the air, water, and land or transferred off-site. Listing as a TRI facility does not necessarily mean that releases are harmful to humans or the environment.

Federal Occupational Safety and Health Administration (OSHA)

Establishes and enforces Federal regulations related to health and safety of workers exposed to toxic and hazardous materials. OSHA also sets health and safety guidelines for construction activities and manufacturing facility operations.

U.S. Department of Transportation (DOT)

Regulates the shipment of hazardous material. DOT also administers the Hazardous Materials Transportation Uniform Safety Act (HMTUSA) to clarify conflicting state, local, and federal regulations. HMTUSA requires the Secretary of Transportation to promulgate regulations for the safe transport of hazardous material in intrastate, interstate, and foreign commerce. The Secretary also retains authority to designate materials as hazardous (along with EPA) when they pose unreasonable risks to health, safety, or property.

Standardized Emergency Management System and National Incident Management System (SEMS)

According to the State's SEMS, local agencies have primary authority regarding rescue and treatment of casualties and making decisions regarding protective actions for the community. When a major incident occurs, the first few moments are critical in terms of reducing loss of life and property. First responders must be sufficiently trained to understand the nature and the gravity of the event to minimize the confusion that inevitably follows catastrophic situations. This on-scene authority rests with the local emergency services organization and the incident commander. SEMS requires that emergency response agencies use basic principles and components of emergency management, multi-agency or inter-agency coordination, the operational area concept, and established mutual aid systems. Local government must use SEMS to be eligible for State funding of response-related personnel costs.

State

California Occupational Safety and Health Administration (CalOSHA)

Responsible for promulgating and enforcing State health and safety standards and implementing Federal OSHA Laws. For example, CalOSHA's regulatory scope includes provisions to minimize the potential for release of asbestos and lead during construction and demolition activities.

California Environmental Protection Agency (CalEPA)

CalEPA establishes regulations governing the use of hazardous materials in the State to protect air, water, and soil. CalEPA consists of the California Air Resources Board (CARB), the Department of Pesticide Regulation, the Department of Resources Recycling and Recovery (CalRecycle), the Department of Toxic Substances Control (DTSC), the Office of Environmental Health Hazard Assessment, and the State Water Resources Control Board (SWRCB).

CalEPA implements and enforces a statewide hazardous materials program known as the Certified Unified Program Agency (CUPA) established by Senate Bill 1802 to enable counties and local government to enforce the administrative requirements, permits, inspections, and enforcement activities for the following environmental and emergency management programs for hazardous materials:

- Hazardous Materials Release Response Plans and Inventories (Business Plans)
- California Accidental Release Prevention Program
- Underground Storage Tank Program
- Aboveground Petroleum Storage Act Requirements for Spill Prevention, Control, and Countermeasure Plans
- Hazardous Waste Generator and On-site Hazardous Waste Treatment Programs
- California Uniform Fire Code, Hazardous Materials Management Plans, and Hazardous Material Inventory Statements

CUPAs are accountable for carrying out responsibilities previously handled by approximately 1,300 different state and local agencies.

California Office of Emergency Services (Cal OES)

Cal OES coordinates State and local agencies and resources for educating, planning, and warning citizens of hazardous materials and related emergencies, including organized response efforts in case of emergencies such as earthquakes, floods, significant wildfires, prolonged drought, public health emergencies, cybersecurity attacks, agricultural and animal disasters, and even threats to homeland security.

California Department of Forestry and Fire Protection (CAL FIRE), Office of the State Fire Marshal (CAL FIRE-OSFM)

The Office of the State Fire Marshal evaluates and provides technical assistance for the Hazardous Material Management Plan, the Hazardous Materials Inventory Statement and the Aboveground Petroleum Storage Act Programs.

California Hazardous Waste Control Law

The California Hazardous Waste Control Law is administered by the California EPA to regulate hazardous waste. State Hazardous Waste Control Law is generally more stringent than RCRA, and regulates the generation, treatment, storage, and disposal of hazardous waste in California. The Hazardous Waste Control Law lists 791 chemicals and approximately 300 common materials that may be hazardous; establishes criteria for identifying, packaging, and labeling hazardous wastes; prescribes management controls; establishes permit requirements for treatment, storage, disposal, and transportation; and identifies some wastes that cannot be disposed of in landfills. CCR 22 CCR Section 66261.10 provides that waste has "hazardous" characteristics if it has the following effects: [a](1) a waste that exhibits the characteristics may:

> (A) cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness; or (B) pose a substantial present or potential hazard to human health or environment when improperly treated, stored, transported, or disposed or otherwise managed.
>
> According to 22 CCR (Article 11, Chapter 3), substances having a characteristic of toxicity, ignitability, corrosivity, or reactivity are considered hazardous waste. Hazardous wastes are hazardous substances that no longer have a practical use, such as material that has been abandoned, discarded, spilled, contaminated, or are being stored prior to proper disposal. Toxic substances may cause short-term or long-lasting health effects, ranging from temporary effects to permanent disability or death. For example, toxic substances can cause eye or skin irritation, disorientation, headache, nausea, allergic reactions, acute poisoning, chronic illness, or other adverse health effects if human exposure exceeds certain levels (the level depends on the substance involved). Carcinogens (substances known to cause cancer) are a special class of toxic substances. Examples of toxic substances include most heavy metals, pesticides, and benzene (a carcinogenic component of gasoline). Ignitable substances (e.g., gasoline, hexane, natural gas) are hazardous because of their flammable properties. Corrosive substances (e.g., strong acids and bases such as sulfuric (battery) acid or lye) are chemically active and can damage other materials or cause severe burns upon contact. Reactive substances (e.g., explosives, pressurized canisters, pure sodium metal due to its violent reaction with water) may cause explosions or generate gases or fumes.
>
> Other types of hazardous materials include radioactive and biohazardous materials. Radioactive materials and wastes contain radioisotopes, which are atoms with unstable nuclei that emit ionizing radiation to increase their stability. Radioactive waste mixed with chemical hazardous waste is referred to as "mixed wastes." Biohazardous materials and wastes include anything derived from living organisms. They may be contaminated with disease-causing agents, such as bacteria or viruses (22 CCR 66251.1 et seq.).

California Department of Toxic Substances Control (DTSC)

DTSC regulates hazardous substances and wastes, oversees remedial investigations, protects drinking water from toxic contamination, and warns the public that could potentially be exposed to listed carcinogens. DTSC evaluates and provides technical assistance for the Hazardous Waste Generator Program, including Onsite Treatment (Tiered Permitting) and the RCRA. In addition, EnviroStor is the DTSC data management system for tracking cleanup, permitting,

enforcement and investigation efforts at hazardous waste facilities and sites with known contamination or sites where there may be reasons to investigate further.

Underground Tank Regulations

Title 23, Division 3, Chapter 16 (Underground Tank Regulations) of the California Code of Regulations identifies the regulations applicable to new and existing underground storage tanks. These regulations establish monitoring, maintenance, reporting, abatement, and closure procedures for all underground storage tanks in the state. These regulations are administered by the San Francisco Bay Regional Water Quality Control Board.

California Highway Patrol (CHP)

The CHP has primary regulatory responsibility for the transportation of hazardous wastes and materials.

Cortese List

California Government Code Section 65962.5 established the “Cortese List,” which requires state agencies to compile a list of all properties affected by hazardous waste and develop a framework for how they will continue to be monitored and addressed by the State. The presence of a site on the list can have bearing on the local permitting process as well as on compliance with the California Environmental Quality Act (CEQA).

California Porter Cologne Water Quality Control Act

Division 7 of the California Water Code (Water Code) identifies the enforcement and implementation rights of the Regional Water Quality Control Board to remedy discharges to surface waters or groundwater that would or could violate water quality standards. Standard remedies include issuance of Cease-and-Desist Orders and cleanup and abatement procedures.

Code of Regulations Title 22

Title 22 of the California Code of Regulations contains all applicable State and Federal laws governing hazardous waste in the State. Title 22 is more stringent and broader in its coverage of wastes than Federal law. Chapter 51 (Site Remediation) identifies the minimum standards of performance for site investigations and response actions performed by the private sector in site cleanup efforts. Hazardous waste is any waste with properties that make it potentially dangerous or harmful to human health or the environment. Hazardous waste is defined in one of two ways. Waste is considered hazardous if it appears on one of the five lists created pursuant to the RCRA. In addition, a waste may be categorized as hazardous if it exhibits one of these four characteristics: ignitibility, corrosivity, reactivity, and toxicity. Because of their toxicity, solid wastes containing certain levels of lead are considered hazardous and must be handled, transported, and disposed of in accordance with Federal and State law, based on established concentration thresholds. Hazardous Waste must be disposed of at Class I landfills that are specifically designed to accept hazardous waste, such as the Kettleman Hills Landfill in Kettleman City in Kings County, California.

California Asbestos Standards in Construction

The California Division of Occupational Safety and Health (Cal/OSHA) enforces the California Asbestos Standards in Construction (8 CCR Section 1529). These standards regulate exposure to asbestos in all construction work including demolition of structures. These regulations establish entry and exit procedures for work in asbestos contaminated areas and also establish specific control measures to protect workers based on the type of asbestos they are handling. Such procedures include minimum air circulations, use of respirators, wetting of materials, clothing laundering, construction and demolition equipment requirements, and shielding specifications. Notification procedures require building owner and employee noticing as well as external and internal hazard signage. All asbestos workers are required to complete training programs and register as an asbestos contractor, depending on the type of asbestos being removed. Medical examination requirements are also required to monitor worker health, generally on an annual basis.

California Construction Safety Orders for Lead

Title 8, Section 1532.2 (Lead) of the California Code of Regulations establishes the requirements for any construction worker who may be exposed to lead during demolition or salvage, removal or encapsulation, new construction, and cleanup activities. The construction safety orders establish an action level of 30 micrograms of lead per cubic meter (µg/cm3) of air calculated over an 8-hour time-weighted average without regard for the use of a respirator, meaning this is the limit where safety protocols must be initiated, such as use of a respirator. Under no circumstance may a worker be exposed to 50 µg/cm3 over an 8-hour weighted period. These regulations require implementation of engineering and work practice controls such as respiratory protection, protective clothing, housekeeping, hygiene practices, and signage requirements to meet worker exposure limits. Medical monitoring and training requirements are also identified.

Assembly Bill 2948

In response to the growing statewide concern of hazardous waste management, State Assembly Bill 2948 (Tanner 1986) enacted legislation authorizing local governments to develop comprehensive hazardous waste management plans. The intent of each plan is to ensure that adequate treatment and disposal capacity is available to manage the hazardous wastes generated within its jurisdiction.

Emergency Services Act

Under the Emergency Services Act, the State of California developed an Emergency Response Plan to coordinate emergency services provided by federal, state, and local agencies. Rapid response to incidents involving hazardous materials or hazardous waste is an integral part of the plan, which is administered by the Governor’s Office of Emergency Services. The Office of Emergency Services coordinates the responses of other agencies, including the EPA, California Highway Patrol, Regional Water Quality Control Boards, Air Quality Management Districts, and county disaster response offices.

The Emergency Planning Community Right-to-Know Act

The Emergency Planning Community Right-to-Know Act requires facilities to disclose to the State and Local Emergency Planning Committee the quantities and type of toxic chemicals

stored. To avoid multiple reports to various agencies, the California Health and Safety Code requires notification of chemical inventories to the Administering Agency which is DTSC. Notification of chemical inventory is accomplished through completion of a Hazardous Materials Business Plan and inventory.

Regional

Regional Water Quality Control Board (RWQCB)

One of nine regional boards in the State, the San Francisco Bay Regional Water Quality Control Board (RWQCB) protects surface and groundwater quality from pollutants discharged or threatened to be discharged to the waters of the State. The RWQCB issues and enforces National Pollutant Discharge Elimination System (NPDES) permits and regulates leaking underground storage tanks and other sources of groundwater contamination.

The RWQCB most recently re-issued the Municipal Regional Stormwater NPDES Permit (MRP) in May 2022 to regulate stormwater discharges from municipalities and local agencies (co-permittees) in Alameda, Contra Costa, San Mateo, and Santa Clara Counties, and the cities of Fairfield, Suisun City, and Vallejo. In addition, municipalities throughout the Bay Area are updating their demolition permit processes to incorporate the management of PCBs in demolition building materials to ensure polychlorinated biphenyls (PCBs) are not discharged to storm drains during demolition. As of July 1, 2019, buildings constructed between 1955 and 1978 that are proposed for demolition must be screened for the presence of PCBs prior to the issuance of a demolition permit.

Bay Area Air Quality Management District

The Bay Area Air Quality Management District (BAAQMD) regulates the demolition and renovation of buildings and structures that may contain asbestos, and the manufacture of materials known to contain asbestos. The BAAQMD is vested with authority to regulate airborne pollutants through both inspection and law enforcement and is to be notified 10 days in advance of any proposed demolition or abatement work. BAAQMD regulations must always be followed when removing asbestos or demolishing buildings.

Local

San Mateo County Environmental Health Department

The San Mateo County Environmental Health Department is the CUPA for all cities and unincorporated areas within San Mateo County. The Department conducts regulatory oversight (review of plans and inspections) of all businesses, farms, federal agencies, state agencies, and local agencies that handle quantities of hazardous materials/hazardous waste. The Department routinely inspects regulated facilities and investigates citizen-based complaints and inquiries regarding improper handling and/or disposal of hazardous materials and/or hazardous wastes.

Hazardous Materials Response

The Hazardous Materials Response Team of San Mateo County responds to hazardous materials emergencies throughout the county. The team is a partnership between the Belmont Fire Protection District, the San Mateo County Environmental Health, and the San Mateo County Office of Emergency Services.

Airport Land Use Commission

The C/CAG of San Mateo County, in its designated role as the Airport Land Use Commission for San Mateo County, reviews proposals for general plans, specific plans, zoning ordinances, and land use development proposals in the vicinity of San Francisco International Airport and San Carlos Airport to ensure that future land uses in the surrounding area remain compatible with the realistically foreseeable, ultimate potential aircraft activity. This review is based on the Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport, adopted November, 2012, and/or the Comprehensive Airport Land Use Compatibility Plan for the Environs of San Carlos Airport, adopted April, 2015. Each plan sets forth land use compatibility criteria, compatibility zones, development standards, and policies pertaining to noise, safety, airspace protection, overflight standards, renewable energy, meteorological towers, objects greater than 100 feet in height, and wildlife hazards. The plans also establish the boundaries around each respective airport that define height/airspace protection, noise, and safety areas for policy implementation, and areas within which notification of airport proximity is required as part of real estate transactions.

Town of Hillsborough General Plan

The currently adopted Public Safety Element, Circulation Element, and Open Space and Conservation Element of the Hillsborough General Plan (2005) contain the following goals, policies, and actions regarding flooding, emergency response, airport safety, hazards, and Hazardous Materials:

Public Safety Element

Goal PS-5 - Protect the community from human-caused hazards, such as criminal activity, air pollution and hazardous materials.

> *Policy PS-5.3* - Cooperate with responsible federal, State and County agencies to minimize the risk to the community from the use and transportation of hazardous materials through and adjacent to Hillsborough.
>
> *Policy PS-5.4* - Reduce the per capita production of household hazardous waste in Hillsborough in concert with the County of San Mateo programs for reducing hazardous waste.
>
> *Action PS-5.4* - The Town will work with the County to offer a periodic drop-off program for household hazardous waste and distribute information on alternative non-toxic landscaping treatments, especially to the County Club and schools.

Goal PS-6 - Ensure the Town's ability to respond effectively to natural and human-caused emergencies.

> *Policy PS-6.1* - Support the preparation, implementation and regular update of local preparedness and evacuation plans and multijurisdictional cooperation and communication for emergency situations.
>
> *Policy PS-6.2* - Continue to participate in regional emergency planning efforts.
>
> *Policy PS-6.3* - Educate residents regarding appropriate actions to safeguard life and property during and immediately after various types of emergencies.

Action PS-6.1 - The Town will develop a local emergency preparedness plan that identifies a City chain of command, outlines an action checklist and coordinates with the San Mateo County Emergency Operations Plan.

Action PS-6.2 - The Town will provide community awareness and education programs for citizens describing procedures and evacuation routes to be followed in the event of a disaster.

Action PS-6.3 - The Town will conduct periodic drills using emergency response systems to test the effectiveness of the Town's procedures.

Circulation Element

Policy C-1.5 - Maintain adequate emergency access for all land uses.

Open Space and Conservation Element

Policy OSC-4.5 - Reduce the amount of hazardous wastes entering into the local and regional waterways by:

- Prohibiting the illicit dumping of wastes into storm drains, creeks and other waterways.
- Prohibiting the discharge of pollutants to the maximum extent practicable.
- Encouraging the use of naturally pest-resistant landscaping and design features that reduce the need for chemical treatments, and incorporate stormwater detention and retention into their design, when appropriate.

4.8.3 Thresholds of Significance

Per the CEQA Guidelines, implementation of the proposed Project would have a significant impact related to hazards and hazardous materials if it will:

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 one-quarter 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, would it create a significant hazard to the public or the environment.

E. For development within the project area 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, would the project 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. [*Note: This threshold of significance has been moved to Chapter 4.16 Wildfire.]*

4.8.4 Impacts and Mitigation Measures

The proposed Project consists of updates to the existing 2014 - 2022 Housing Element to reflect the 6th cycle 2023 – 2031 housing assignments. In addition, associated amendments to the Land Use Element and General Plan Land Use Map, Open Space and Conservation Element, and Public Safety Element; amendments to Title 17 (Zoning) of the Hillsborough Municipal Code, and amendments to the Hillsborough Zoning Map are proposed for consistency of all Town documents, codes, and regulations. These associated amendments are generally described in sections 3.3.9 through 3.3.12 in the Project Description and would not result in environmental impacts related to hazards and hazardous materials. Therefore, they are not discussed further in this chapter. The impact analysis focuses on the residential development that would be facilitated by the Draft 2023 – 2031 Housing Element.

This chapter describes potential impacts related to hazards and hazardous materials which could result from the proposed Project (i.e., facilitation of 554 new housing units) and recommends mitigation measures as needed to reduce significant impacts.

Impact HAZ-1 – Project-Related Potential Impacts Due to Hazardous Materials Transport, Use, Storage, or Disposal. *[Threshold of Significance (a)]*

Hazardous materials include substances that are flammable, corrosive, explosive, radioactive, infectious, thermally unstable, and poisonous. The hazardous materials transport, use, storage, and disposal discussion that follows would apply to all proposed housing sites.

Future residential development facilitated by the Project (e.g., construction and routine household maintenance) would not be expected to include the routine transport, use, storage, and disposal of these types of hazardous materials although construction of residential units as well as ongoing maintenance over time may involve their intermittent transport, use, and disposal. These materials typically include petroleum-based fuels and lubricants for equipment, wet concrete and asphalt, paints, solvents, and other hazardous materials commonly used in construction and maintenance. With regard to future household maintenance, the types of materials expected to be used would typically include household hazardous substances such as cleansers, degreasers, pesticides, and fertilizers, but on a smaller scale than during construction.

All hazardous substances associated with future residential construction and operations (including maintenance) would be used, transported, stored, and disposed of in conformance with applicable regulations, including:

- The Resource Conservation Recovery Act, which provides the “cradle to grave” regulation of hazardous wastes;
- The Comprehensive Environmental Response, Compensation, and Liability Act, which regulates closed and abandoned hazardous waste sites;
- The Hazardous Materials Transportation Act, which governs hazardous materials transportation on US roadways;

- The International Fire Code, which creates procedures and mechanisms to ensure the safe handling and storage of hazardous materials;
- California Code of Regulations Title 22, which regulates the generation, transportation, treatment, storage, and disposal of hazardous waste; and
- The California Code of Regulations Title 27, which regulates the treatment, storage, and disposal of solid wastes.

Compliance with applicable regulations would ensure that the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. The Project would have a ***less-than-significant impact.***

Impact HAZ-2 – Hazards Due to Reasonably Foreseeable Upset and Accident Conditions Involving Release of Hazardous Materials into the Environment. *[Threshold of Significance (b)]*

The discussion of reasonably foreseeable hazardous materials upset and accidental releases that follows would apply to all proposed housing sites.

There is always a possibility that during new construction facilitated by the Project construction workers, visitors, and/or other passers-by could encounter contamination or be exposed to existing spilled, leaked, or otherwise discharged hazardous materials or wastes. Typically, a lending institution requires an environmental survey or records search of the site prior to a commercial loan to determine potential risk as part of the due diligence. A Phase I Environmental Site Assessment (Phase I ESA) is a tool used to investigate and report the current and past history and uses of a property; if any usage has contaminated the soil or groundwater; and related areas of investigation. The American Society for Testing and Materials standards for conducting Phase I ESAs are designed within the scope of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) to identify potential contamination that may impact a property and present an environmental risk or pose a liability for the current property owner or prospective purchaser. The Phase I ESA follows four steps: records review; site reconnaissance; interviews; and report preparation, including findings about the risk to human health or the environment associated with the proposed use of the property. The Phase I ESA may determine that additional investigation is necessary, in which case a Phase II ESA would likely be recommended. The Phase II ESA includes collecting environmental samples of soil, and sometimes soil vapor, groundwater, surface water for laboratory analysis.

Each future development proposal facilitated by the Project would be required to comply with all applicable, existing County-, regional-, and State-mandated site assessment, remediation, removal, and disposal requirements for soil, surface water, and/or groundwater contamination, as described in the “Regulatory Setting” (Section 4.8.2) above. Project compliance with these standard requirements would ensure that any potential upset conditions are addressed appropriately and impacts from future residential development facilitated by the Project would be ***less than significant.***

Potential Asbestos and PCB Exposure. *[Threshold of Significance (b)]* Residential development under the Project could include the removal or disturbance of asbestos-containing material (ACM) and/or transformers during demolition and redevelopment of the Town Hall site, which could expose construction workers and the public to friable asbestos in building materials and/or polychlorinated biphenyls (PCBs). The BAAQMD regulates the demolition and renovation

of buildings and structures that may contain asbestos, and the manufacture of materials known to contain asbestos. The BAAQMD is vested with authority to regulate airborne pollutants through both inspection and law enforcement and is to be notified 10 days in advance of any proposed demolition or abatement work. BAAQMD regulations must always be followed when removing asbestos or demolishing buildings. California Code of Regulations Title 8 – Cal/OSHA includes standards regulating exposure to asbestos in all construction work including demolition of structures. The future redevelopment of the Town Hall site and any other building demolition facilitated by the proposed Project should coordinate with the BAAQMD when required to determine if ACM and/or PCBs are present, in conformance with BAAQMD established protocols.

Impacts of Vacant Opportunity Sites and Subdivision/Lot Split Opportunity Sites (*2260 Redington Road, 50 Brooke Court, Hayne Road)*: Although development of these vacant opportunity sites would seem not to be prone to encountering asbestos-containing material (ACM) and/or transformers during project development activities because no building demolition would be necessary, it is possible that former structures on the site were removed in the past and residual ACMs or equipment (such as transformers) could exist that would expose construction workers and the public to friable asbestos and/or polychlorinated biphenyls (PCBs).susceptible.

Impacts of ADUs: Future development of ADUs would also seem not to be prone to encountering ACM and/or transformers during project development activities because they would occur on sites with an existing residential structure and therefore would be assumed to not have any ACMs or equipment (such as transformers) remaining. However, it is possible that in the area of the parcel where the ADU would be located there could have been former structures that were removed in the past and residual ACMs or equipment could exist that would expose construction workers and the public to friable asbestos and/or polychlorinated biphenyls (PCBs).

Impacts of Multi-Family Opportunity Sites (*Nueva School, Burlingame Country Club, Town Hall Complex, Tobin Clark):* Future redevelopment on the multi-family sites that would require building demolition could include the removal or disturbance of ACM and/or transformers during demolition and redevelopment activities, which could expose construction workers and the public to friable asbestos and/or PCBs. In particular, development of the Town Hall site could expose construction workers and the public to friable asbestos and/or polychlorinated biphenyls (PCBs) through the removal or disturbance of ACM and/or transformers during demolition and redevelopment of the site. The Nueva School, Burlingame Country Club, and Tobin Clark sites are not anticipated to contain ACM or PCB because of the history of the sites and the undeveloped nature of the area identified for housing.

Ensuring proper identification and removal of ACM and PCBs requires development facilitated by the Project to comply with the requirements of applicable BAAQMD rules and regulations, even if the project is ministerial.

Project compliance with these standard State and BAAQMD procedures would ensure that any potential ACM and PCB exposure impacts from future development facilitated by the Project would be ***less than significant.***

Potential Lead-Based Paint Exposure. *[Threshold of Significance (b)]* Redevelopment of the Town Hall site could result in the disturbance of surfaces painted with lead-based paint, resulting

in airborne lead particles that could be released into the air. California OSHA (CalOSHA) regulations would apply, and each site-specific project would implement the following standard, mandatory procedures in accordance with those CalOSHA regulations:

- Notify the Town's Building Division prior to starting work, describing the nature, location, and schedule of the work;
- Post a sign at all work locations where lead containment is required, stating that lead-based paint abatement is in progress and public access is prohibited;
- Notify the tenant(s) where the lead-based paint abatement work will be performed on a residential property occupied by one or more tenants; and
- Notify the property owner when work on a residential project will disturb lead-based paint.

Lead abatement performance standards are included in the *Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing* (U.S. Department of Housing and Urban Development). Accordingly, HEPA vacuums may be required for abrasive blasting, water blasting, scraping, or sanding. Burning, torching, and similar activities are prohibited. Following completion of lead-based paint abatement, all visible lead-based paint particles must be removed from the site.

Impacts of Vacant Opportunity Sites and Subdivision/Lot Split Opportunity Sites (*2260 Redington Road, 50 Brooke Court, Hayne Road)*: Development of these vacant opportunity sites would seem not to be prone to encountering lead-based paint because sites do not contain existing buildings and no building demolition would be necessary. However, it is possible that former structures on site were removed in the past and residual lead-based paint (on remaining debris) could exist that if disturbed could result in airborne lead particles released into the air. For those specific projects, California OSHA (CalOSHA) regulations would apply that require implementing standard, mandatory procedures in accordance with those CalOSHA regulations.

Impacts of ADUs: Future development of ADUs would also seem unlikely to be prone to encountering lead-based paint because no building demolition would be necessary, although it is possible that former structures on site were removed in the past and residual lead-based paint (on remaining debris) could exist. This could in turn result in airborne lead particles as discussed above. For those specific projects, California OSHA (CalOSHA) regulations would apply that require implementing standard, mandatory procedures in accordance with those CalOSHA regulations.

Impacts of Multi-Family Opportunity Sites (*Nueva School, Burlingame Country Club, Town Hall Complex, Tobin Clark):* Future redevelopment of the Town Hall site could result in the disturbance of surfaces painted with lead-based paint resulting in airborne lead particle releases. For this project, California OSHA (CalOSHA) regulations would apply that require implementing standard, mandatory procedures in accordance with those CalOSHA regulations. The Nueva School, Burlingame Country Club, and Tobin Clark sites are not anticipated to contain lead-based paint because of the history of the sites and the undeveloped nature of the area identified for housing.

The Town may inspect lead-based paint abatement activities at any time during construction. These personnel are also responsible for addressing citizen complaints related to lead-based paint abatement activities and may issue a Notice of Violation, a Stop Work order, or a fine.

Project compliance with these State procedures would ensure that any potential lead-based paint exposure impacts from future development facilitated by the Project would be ***less than significant.***

Potential Exposure to LUST Site Contaminants. As previously discussed, the Planning Area contains 33 LUST sites that have been recorded by the State Water Board, and 24 of these 33 sites are also included on the State's "Cortese list," which is discussed in the following section. With the exception of one site designated "open – site assessment," meaning that additional investigation or evaluation activities are being conducted, all 32 remaining sites are designated "completed – case closed." Most of the LUST sites are on residential properties (heating oil fuel tanks) although there are four non-residential properties with closed LUST cases:

- Town Hall at 1600 Floribunda noted for gasoline;
- Fire Dept at 835 Chateau noted for diesel fuel and waste oil;
- Town Corporation Yard at 1320 La Honda noted for gasoline;
- Crystal Springs Upland School at 400 Upland Drive noted for heating oil and fuel oil.

However, the potential exists that additional sites may contain contaminated soil and/or groundwater that would be discovered and/or released during construction activities, which could require both an immediate emergency response and/or a longer-term remedial action. One of the identified LUST sites is being considered for future multi-family housing – the Town Hall site on Floribunda Avenue. There are no LUST sites identified on the other three multi-family sites (Tobin Clark, Nueva Private School, and Burlingame Country Club). However, because the remaining LUST sites are all identified as private residences, which means they could be eligible to develop an ADU if so desired by the property owner, implementation of the Housing Element Update could include development of sites (or parts thereof) that may contain unrecorded or unknown hazardous materials from previous uses. Without knowledge of the existing conditions of any specific housing site, the Project could result in a significant hazard to the public or the environment through exposure from unintentional release or other foreseeable upset or accident conditions.

Impacts of Vacant Opportunity Sites and Subdivision/Lot Split Opportunity Sites (*2260 Redington Road, 50 Brooke Court, Hayne Road)*: Development of these vacant opportunity sites could also occur on a site that may contain unknown contaminated soil and/or groundwater that would be discovered and/or released during construction activities, with subsequent emergency response and/or a longer-term remedial action implications. These impacts could be potentially significant.

Impacts of ADUs: Future development of ADUs could also occur on a site that may contain unknown contaminated soil and/or groundwater that would be discovered and/or released during construction activities, with subsequent emergency response and/or a longer-term remedial action implications. These impacts could be potentially significant.

Impacts of Multi-Family Opportunity Sites (*Nueva School, Burlingame Country Club, Town Hall Complex, Tobin Clark):* Future development and/or redevelopment could occur on a site that may contain unknown contaminated soil and/or groundwater that would be discovered and/or released during construction activities, with subsequent emergency response and/or a longer-term remedial action implications. For instance, the Town Hall (at 1600 Floribunda) is identified on a State Water Board list for having a known gasoline storage tank (e.g., UST). Though this

UST site is “closed,” there could remain unknown contaminated soil and/or groundwater. These impacts could be potentially significant.

The General Plan includes Public Safety Element policies and actions focused on providing protection of the community from the use and transportation of hazardous materials. However these policies do not specifically address public safety or protect the public from reasonably foreseeable upset and accident conditions associated with hazardous materials, Existing General Plan Policy PS-5.3 provides for cooperating with federal, State, and County agencies to minimize the risk to the community from the use and transportation of hazardous materials through and adjacent to Hillsborough, and Policy PS-5.4 promotes reducing the per capita production of household hazardous waste in Hillsborough. Action PS-5.4 calls for the Town to work with the County to offer a periodic drop-off program for household hazardous waste and distribute information on alternative non-toxic landscaping treatments. In addition, the BAAQMD regulates airborne pollutants resulting from the demolition and renovation of buildings and structures that may contain asbestos.

Together, these General Plan policies and BAAQMD regulations support the protection of the public from known hazardous materials, but additional measures are needed to ensure public safety from reasonably foreseeable upset and accident conditions associated with hazardous materials. These impacts could be potentially significant. Mitigation Measure HAZ-1 is recommended to provide Town policy that addresses risk of upset conditions and reduces the impact to ***less than significant with mitigation***.

Impact HAZ-1: The Project could expose future residents to reasonably foreseeable upset and accident conditions associated with hazardous materials.

Mitigation Measure HAZ-1: Amend General Plan Public Safety Element. To protect the public and the environment from reasonably foreseeable upset and accident conditions associated with hazardous materials, adopt new Public Safety Policy PS-5.5 and new Public Safety Action PS-5.5, and amend the Municipal Code to establish development standards specified in proposed Action PS-5.5.

> *Policy PS-5.5:* Mitigate hazard exposure to and from new development projects through the environmental review process, design criteria, and standards enforcement, including, where deemed necessary and based on the history of land use, requiring site assessment for hazardous and toxic soil contamination prior, including preparation of a Phase 1 Environmental Site Assessment (ESA) to approving development project applications.
>
> *Action PS-5.5:* Establish development standards for new development and redevelopment to identify and abate hazardous material releases from prior land uses that have the potential to affect future property owners or users. A Phase I Environmental Site Assessment should be required where appropriate; a Phase II Environmental Site Assessment, with environmental testing and/or remediation, may also be required based on the findings of the Phase I Environmental Site Assessment.

Impact HAZ-3 – Potential for Hazardous Materials Near Schools. *[Threshold of Significance (c)]*

Almost all residential parcels in the Town would be eligible to develop ADUs,[29] and there are residential parcels within one-quarter mile of each of the schools located in the Town in addition to two schools located immediately adjacent to the Town (Odyssey Middle School and the College of San Mateo). Other proposed housing sites are also located within one-quarter mile of schools in the Town, including approximately five of the Housing Opportunity Sites, two of the Subdivision/Lot Split Sites, and three of the Multi-Family Sites. (It should also be noted that one of the proposed multi-family housing sites is at Nueva School.) Therefore, there is potential for the Project to result in hazardous emissions during construction activities that may affect a school.

Generally, residential construction would involve the intermittent transport, use, storage, and disposal of fuels and lubricants, paints, solvents, and other materials, but would be required by the Town to submit a properly completed waste reduction plan that identifies all waste materials expected to be generated as a result of the project at the time of demolition or building permit application. No demolition or building permit would be issued until the applicant has received approval by the building official of a waste reduction plan.[30] Generally, post-construction residential uses would not disperse harmful emissions because they would be typical household products, such as liquid and solid cleaners, pool chemicals, and lawn treatments, which would not be used or stored in the quantities or toxicity of chemicals used in commercial and industrial businesses, such as a dry cleaners, manufacturing plants, research laboratories, and auto repair shops. As discussed in Impact HAZ-1, residential uses are not expected to involve the routine transport, use, storage, or disposal of hazardous materials to the extent that a significant public or environmental hazard would occur. In addition, as discussed in Impact HAZ-2, impacts related to release of unknown hazardous materials during project construction would be reduced to a less-than-significant level with implementation of Mitigation Measure HAZ-1. With respect to possible future new school development, CEQA (Public Resources Code Section 21151.8, School Site Acquisition or Construction) and other State regulations impose restrictions on where new schools can be constructed. State regulations also limit the siting of hazardous materials facilities in proximity to schools.

Impacts of Vacant Opportunity Sites and Subdivision/Lot Split Opportunity Sites (*2260 Redington Road, 50 Brooke Court, Hayne Road):* As noted above, development on many of the residential parcels in the Town could occur within one-quarter mile of a school. Two of the subdivision/lot split sites (50 Brooke Court and Hayne Road) and several undeveloped opportunity sites are located within one-quarter mile of schools, which could result in potential hazardous emissions during construction activities.

Impacts of ADUs: Because future development of ADUs could occur on almost any residential parcel in the Town, and there are many residential parcels within one-quarter mile of schools,

[29] As discussed in Chapter 3, Project Description, because the Pipeline Projects are individual projects already in the Town's review process, they are not being evaluated in this EIR with the exception of their contribution to total potential housing buildout (including cumulative implications).

[30] Communications with Town Staff re additional information needs, October 3, 2023.

development of ADUs could occur within one-quarter mile of a school, which could result in potential hazardous emissions during construction.

Impacts of Multi-Family Opportunity Sites (*Nueva School, Burlingame Country Club, Town Hall Complex, Tobin Clark):* As noted above, development of three of the multi-family opportunity sites (Nueva School, Burlingame Country Club, and Tobin Clark) could occur within one-quarter mile of a school, which could result in potential hazardous emissions during construction. As noted previously, one of the proposed multi-family housing sites is at Nueva School.

Compliance with applicable regulations and implementation of Mitigation Measure HAZ-1 would require proper use, storage, and disposal of potentially risky materials and would further reduce risks from the Project related to existing or future proposed schools. See Section 4.2 Air Quality for potential construction-related air toxics impacts to schools and other sensitive receptors. In addition, with existing General Plan policies and federal, State and local regulations pertaining to hazardous materials, the potential impact of hazardous materials on schools from future development facilitated by the Project would be ***less than significant***.

Impact HAZ-4 – Protocols for Government Code Section 65962.5 Sites (Cortese List). *[Threshold of Significance (d)]*

As discussed previously, there are approximately 24 sites in the Planning Area that are included on the State's "Cortese List." Many of these sites are on residential properties. All 24 sites have been remediated and their clean-up operations completed.[31] There are no other sites in Hillsborough included on the Cortese list. In addition, as discussed in Impact HAZ-2, the General Plan includes policies and an action addressing protection of the community from human-caused hazards such as hazardous materials. Implementation of Mitigation Measure HAZ-1 would reduce risks of encountering unrecorded hazardous materials during construction.

Impacts of Vacant Opportunity Sites and Subdivision/Lot Split Opportunity Sites (*2260 Redington Road, 50 Brooke Court, Hayne Road):* None of the three subdivision/lot split or vacant opportunity sites has been included on the Cortese list.

Impacts of ADUs: There are 21 "private residence" sites included on the Cortese list. Because future development of ADUs could occur on almost any residential parcel in the Town, future ADU development could occur on any of these 21 identified Cortese list sites.

Impacts of Multi-Family Opportunity Sites (*Nueva School, Burlingame Country Club, Town Hall Complex, Tobin Clark):* One of the multi-family opportunity sites (Town Hall) is on the Cortese list.

Development project compliance with these site-specific mitigation protocols administered by DTSC, RWQCB, and other jurisdictional agencies (including the San Mateo County CUPA) and with Mitigation Measure HAZ-1 would ensure that any potential contamination impacts from future development facilitated by the Project would be ***less than significant***.

[31] As discussed below, future development could occur on up to 22 of the 24 sites on the Cortese list; the remaining two sites on the list are Town-owned properties that are not considered as housing opportunity sites (Hillsborough Fire Station 33 at 835 Chateau Drive and the Hillsborough Corporation Yard at 1320 La Honda).

Impact HAZ-5 – Potential Airport Hazards. *[Threshold of Significance (e)]*

The San Francisco Airport is approximately 1.8 miles northeast of the Town's northern boundary; the San Carlos Airport is approximately 4.6 miles southeast of the Town's southern borders. The entire Town is located in the San Francisco Airport Influence Area A and a portion of the Figure 4.8-1).[32] A portion of the Town southeast of Chateau Drive/Ralston Avenue is located in the San Carlos Airport Area of Influence Boundary A, and no portion of the Town is located in Area of Influence Boundary B.[33]

Impacts of Vacant Opportunity Sites and Subdivision/Lot Split Opportunity Sites (*2260 Redington Road, 50 Brooke Court, Hayne Road)*: As noted above, approximately five of the vacant opportunity sites are located within SFO Influence Area "B"; all of the vacant opportunity sites are located in Influence Area "A" of both SFO and San Carlos airport. One of the three subdivision/lot split opportunity sites is located within SFO Influence Area "B" (2260 Redington Road); all three subdivision/lot split opportunity sites are located in Influence Area "A" of both SFO and San Carlos airport.

Impacts of ADUs: Because future development of ADUs could occur on almost any residential parcel in the Town, nearly all residential parcels generally located northwest of Chateau Drive/Ralston Avenue would be located within SFO Influence Area "B"; all residential parcels (hence all potential ADU sites) are located in Influence Area "A" of both SFO and San Carlos airport.

Impacts of Multi-Family Opportunity Sites (*Nueva School, Burlingame Country Club, Town Hall Complex, Tobin Clark):* As noted above, two of the multi-family opportunity sites are located within SFO Influence Area "B" (Burlingame Country Club depending on the particular site location, and Town Hall); all of the multi-family sites are located in Influence Area "A" of both SFO and San Carlos airport.

All proposed housing sites (e.g., the entire Town) are located in Influence Area "A" of either airport and would be required to inform residents of the presence of the relevant airport (a standard real estate disclosure). Future housing proposed for sites located in Influence Area "B" of San Francisco Airport (as described above) would require review by the SFO ALUC. This ALUC review of future individual development applications for sites within the Referral Area Boundary would ensure compatibility with airport land use and safety policies. Compliance with these airport land use policies and protocols would reduce potential safety hazards and the Project would have a ***less- than-significant impact***. See Chapter 4.11.5 Noise for potential airport noise impacts.

Impact HAZ-6 – Impacts Related to Adopted Emergency Response Plans or Emergency Evacuation Plans. *[Threshold of Significance (f)]*

Please see Chapter 4.16 Wildfire for a discussion of emergency evacuation planning. The emergency evacuation and emergency response planning discussion that follows would apply to all proposed housing sites.

[32] City/County Association of Governments of San Mateo County, Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport, November 2012.

[33] City/County Association of Governments of San Mateo County, Final Comprehensive Airport Land Use Compatibility Plan For the Environs of San Carlos Airport, Adopted October 2015.

The San Mateo County Department of Emergency Management is responsible for coordinating emergency response in the county and operates under a Joint Powers Agreement with the 20 incorporated cities in the county. As discussed earlier in this section, the Town of Hillsborough has a comprehensive Emergency Operation Plan (EOP), prepared in coordination with the City of Burlingame and in compliance with State law, to address incident-specific conditions related to earthquake, wildland fire, severe weather (including extreme heat or cold, flooding, high winds), energy disruption, hazardous materials emergency, tsunami, terrorism, plane crash, and civil unrest.

For evacuation needs, the Town uses ZoneHaven (recently renamed “genasys Protect”), a community evacuation interface that allows the public access to real-time status updates and instructions for their evacuation zone. This platform can be accessed on a smartphone, computer. or tablet, and it interfaces with real-time GPS-guided traffic maps so that residents can follow local emergency responders. Residents can also use SMC Alert, which is a free County service that sends emergency and non-emergency text and voice messages to email accounts, cell phones, smartphones, tablets, and landline phones (e.g., home and work). In addition, the Town’s “Alert Center” offers residents access to emergency alerts and other advisories and urgent information.

The Town has been divided into eight evacuation zones with maps providing information on potential evacuation routes. However, exact evacuation routes used would depend on several variables, including the type, scope, and location of the incident. In general, the routes would direct traffic to El Camino Real or I-280 via Town streets such as Skyline Boulevard, Hayne Road, Black Mountain Road, Chateau Drive, Ralston Avenue, Summit Drive, Forest View Avenue, Churchill Drive, Skyfarm Drive, Marlborough Road, Lakeview Drive, Tartan Trail Road, Eucalyptus Avenue, Sharon Avenue, Hillsborough Boulevard, Parrott Drive, Tournament Drive, and Tobin Clark Drive.

Individual future housing applications would be subject to Fire Department review and would be required to comply with California Fire Code and Central County Fire Department standards, including access requirements.

In addition, the General Plan includes Public Safety Element policies and actions focused on emergency response and/or evacuations. Policy PS-6.1 supports regular updates of local preparedness and evacuation plans, including multi-jurisdictional cooperation and communication, and Policy PS-6.2 provides for continued participation in regional emergency planning efforts. Action PS-6.2 calls for the Town to provide community awareness and education programs for citizens, describing procedures and evacuation routes to be followed in the event of a disaster. Action PS-6.3 provides for testing the effectiveness of the Town’s procedures through periodic drills using emergency response systems. The General Plan also includes Circulation Element Policy C-1.5, which calls for maintaining adequate emergency access for all land uses.

Project compliance with these General Plan policies and actions and with State and local standards would ensure that potential impacts on adopted emergency response plans or emergency evacuation plans associated with future development facilitated by the Project would be ***less than significant.***

4.8.5 References

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4.9 Hydrology and Water Quality

4.9.1 Environmental Setting

Watersheds

The Town of Hillsborough is located in the San Francisco Bay Hydrologic Region, below Upper and Lower Crystal Springs reservoirs and Buri Buri Ridge on the eastern slopes of Montara Mountain (Town of Hillsborough 2018). The Town drains from west to east/northeast through several streams that ultimately discharge to San Francisco Bay.

The Planning Area encompasses four watersheds which, from north to south, include Mills Watershed, Sanchez Watershed, San Mateo Watershed, and Pulgas Watershed. The Planning Area also contains several small creeks, including San Mateo Creek, Sanchez Creek, Easton Creek, Borel Creek, Burlingame Creek, Terrace Creek, Ralston Creek, and additional unnamed creeks, and two lakes, Crocker and Spencer (BKF 2015).

Groundwater

The Town lies immediately adjacent to the western edge of the San Mateo Plain Groundwater Basin, except for the northerly end of the Brewer Subdivision, which lies inside the basin boundary (Town of Hillsborough 2018). Water-bearing layers within the basin consist of coarse-grained alluvial fan deposits that range in depth below the surface from 20 to more than 600 feet. The basin is recharged primarily through infiltration into gravelly, streambed deposits that channel water into unconsolidated lenses of sand, gravel or finer grained, water bearing materials that extend throughout the basin and underneath San Francisco Bay.

There are no known published reports regarding the capacity of the groundwater basin, the current volume of water in storage, or the rate at which groundwater is used (Town of Hillsborough 2018). However, there are nearly 950 documented agricultural, residential, and industrial wells using groundwater from the basin, plus an unknown number of undocumented wells. The Town of Hillsborough obtains all of its water from the San Francisco Public Utilities Commission (SFPUC), which also serves the City of San Mateo and a number of other Peninsula cities. In the City of San Mateo, the water system is operated by the California Water Service Company, which as of 2017, has no wells in its San Mateo/San Carlos service area to supplement imported water supplies. Although there are no known public uses of groundwater in the Hillsborough vicinity, the San Mateo County Office of Sustainability and the County Division of Environmental Health Services are jointly working on an assessment of the San Mateo Plain groundwater basin to identify groundwater management strategies to protect both existing and future beneficial uses.

Stormwater Runoff / Water Quality

The Town of Hillsborough's storm drain system includes 2,500 catch basins and storm drain inlets, manholes, pipes, conveyance channels, creeks, ditches, pump stations (Town of Hillsborough 2023). The Town's storm drain system handles runoff from Hillsborough's approximately 96 miles of streets and the four watersheds within which the Town is located. A majority of the Town drainage is conveyed by creeks. There are seven primary drainage

systems. The largest system is San Mateo Creek, with a drainage area of approximately 33 square miles at El Camino Real crossing. Flow to San Mateo Creek is detained within the Crystal Springs Reservoir system. The other six drainage systems include Easton Creek, Sanchez Creek, Terrace Creek, Ralston Creek, Burlingame Creek, and Borel Creek. Because most runoff from the Town is conveyed by creeks, storm drain systems tend to have short runs.

According to the State Water Quality Control Board's list of impaired waters, key pollutants of concern for San Francisco Bay near Hillsborough include mercury, selenium, organic pesticides, polychlorinated biphenyls (PCBs), trash, invasive species, and toxic organic compounds (Town of Hillsborough 2018; State Water Board 2018). Pollutants of concern for San Mateo Creek include diazinon (an insecticide now banned for all but agricultural use) and trash. The Town has influence over the quality of water in the four watersheds within which it is located. Adverse water quality conditions are typically addressed through implementation of Low Impact Development (LID) design to reduce the volume of stormwater runoff discharged to storm drains and streams, and through application of Best Management Practices (BMPs) that remove pollutants before runoff is discharged. Such measures improve surface water quality through a combination of diversion and treatment, and also protect groundwater quality by removing contaminants before they seep into the highly permeable streambed sands and gravels that generally play the largest role in groundwater recharge throughout the region.

The creeks in Hillsborough provide important riparian habitat (Town of Hillsborough 2005). In addition to providing natural habitat for plant and animal species, well established vegetation along these waterways plays an important role in controlling erosion.

Flooding

Flooding and Climate Change

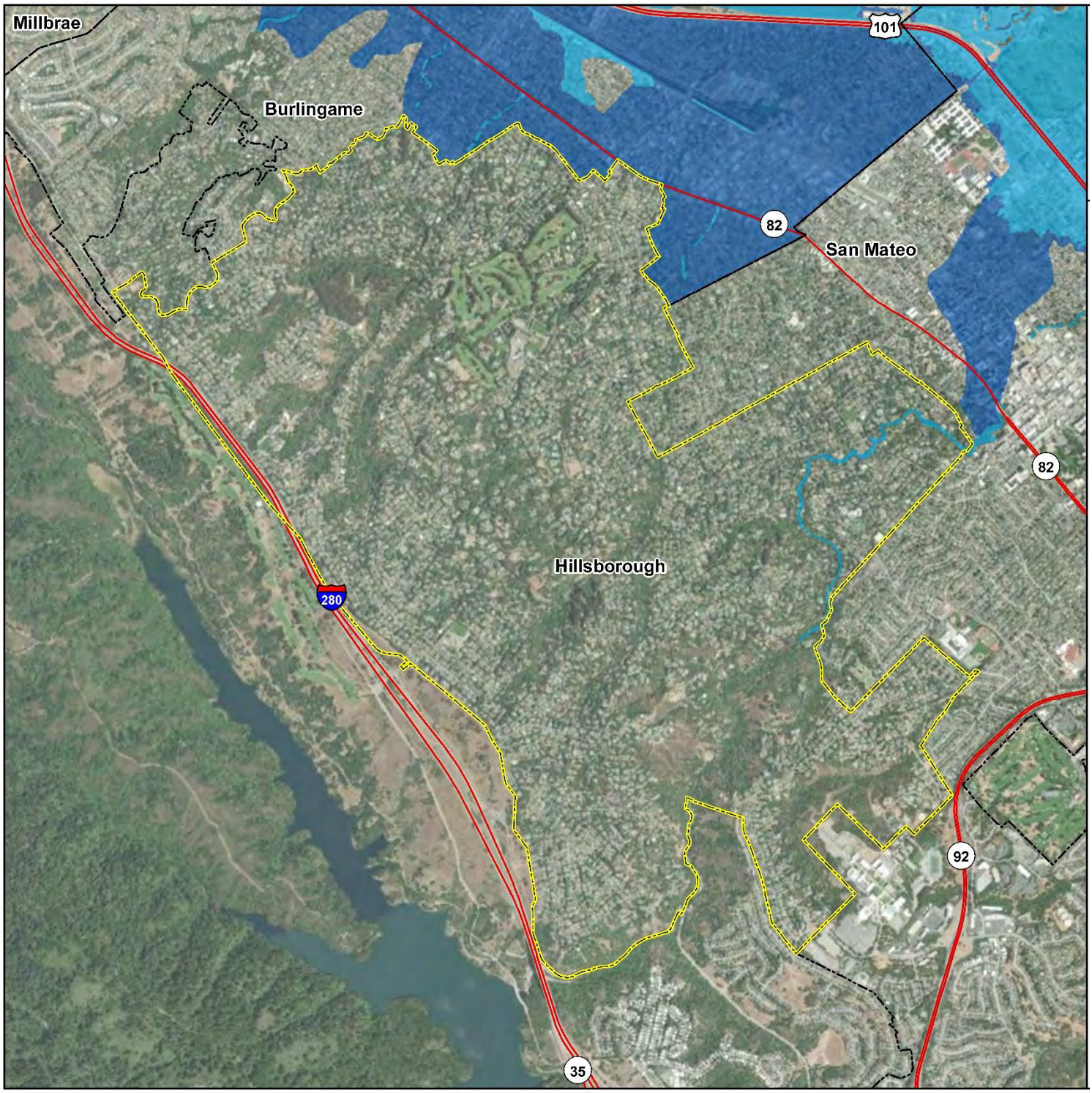
Inland flooding can cause significant harm to buildings, people, and infrastructure. Floodwater can be deep enough to drown people and may move fast enough to carry people or heavy objects (such as cars) away. Flooding can be caused by heavy rainfall, long periods of moderate rainfall, or clogged storm drains during periods of rainfall. In rare instances, a break in a water pipe or water tank can also cause flooding. To prevent localized flooding during storm events, storm drainage systems throughout Hillsborough collect stormwater runoff from streets and convey flows to discharge points at local receiving waters. The capacity of these stormwater runoff systems are designed based the frequency interval of a typical heavy winter storm (i.e., a 10-year storm) and may not be designed to accommodate more intense storms anticipated under climate change conditions.

Localized Flooding

Localized flooding can occur during peak flow times, mainly in the flatland portions of Town which are located within or near 100-year flood zones. Figure 4.9-1: FEMA Flood Zones shows the 100- and 500-year flood zone areas in the Planning Area, as mapped by FEMA. Areas within the 100-year flood zone have a one in 100 chance of flooding every year. The only 100-year flood zone currently mapped in the Planning Area is located along San Mateo Creek in the southern portion of Hillsborough. Flooding in the 100-year flood zone would not be expected to be more than a few feet deep. Localized flooding can be expected during the winter months, but this does not occur on a yearly basis. The wet season in Hillsborough typically occurs between November and April, accounting for 90% of annual precipitation, with little-to-no precipitation occurring during the summer months (Town of Hillsborough 2021). Average precipitation is approximately 20 inches per year. Winter flooding may increase as the effects of global climate change are felt, increasing the severity and frequency of winter storms, particularly during El Niño years.

Dam Inundation

A dam inundation zone is an area in which flooding could occur due to failure of an upstream dam, endangering people, and property within the zone in the instance of such a failure. Dam inundation can be caused by an earthquake or other catastrophe. There are four zones of dam inundation within Hillsborough: Crystal Springs Dam Inundation Area, Burlingame Dam Inundation Area, Burlingame/Crocker Dam Inundation Area, and Crocker Dam Inundation Area (County of San Mateo 2005). The largest of the dam inundation areas within the Town is the Crystal Springs Dam Inundation Area, as shown in Figure 4.9-2. The Lower Crystal Springs dam poses the largest threat to the community since the reservoir holds a greater amount of water compared to Crocker and Spencer Lakes (Town of Hillsborough 2005). While the dam is located only 400 feet west of the San Andres fault, the San Francisco Public Utilities Commission has studied the dam and found that the dam meets all current earthquake standards. In addition, the San Francisco Public Utilities Commission reported that no damage was found to the dam after the 1906 and 1989 earthquakes. The Hillsborough Public Works Department maintains the dams at Crocker and Spencer Lakes.



Source: Town of Hillsborough

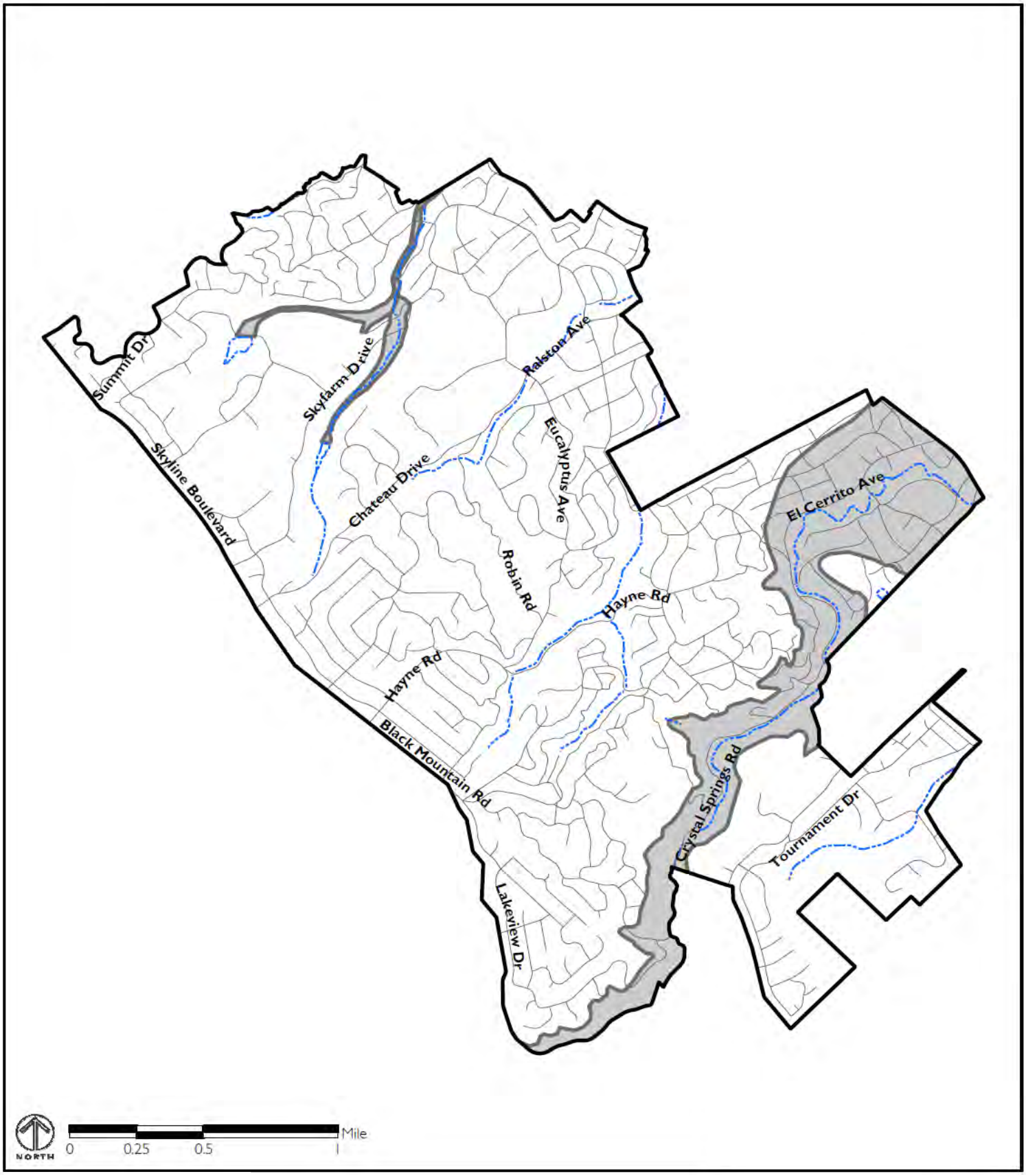
Legend

- 1% Annual Chance Flood (100-Year)
- 0.2% Annual Chance Flood (500-Year)
- Hillsborough Town Limits
- Incorporated Cities
- Highway

0 0.2 0.4 0.8 Miles

N

Figure 4.9-1 FEMA Flood Zones



Source: Town of Hillsborough

Dam Inundation Areas

Creeks

Figure 4.9-2 Dam Inundation Areas

4.9.2 Regulatory Setting

Federal

Clean Water Act

The Clean Water Act (CWA) is the primary federal legislation governing water quality and forms the basis for several state and local laws throughout the nation. The objective of the CWA is "to restore and maintain the chemical, physical, and biological integrity of the Nation's waters." Important and applicable sections of the Act are:

- Section 404 authorizes the United States (U.S.) Army Corps of Engineers (USACE) to regulate the discharge of dredged or fill material to waters of the U.S., including wetlands. The USACE issues individual site-specific or general (Nationwide) permits for such discharges.
- Sections 303 and 304 provide for water quality standards, criteria, and guidelines. The State implements Section 303 through the State Water Resources Control Board and Regional Water Quality Control Board (RWQCB), as discussed below. Section 304 requires the U.S. Environmental Protection Agency to publish water quality criteria that accurately reflects the latest scientific knowledge on the kind of effects and extent of effects that pollutants in water may have on health and welfare. Section 304 also provides guidance to the State in adopting water quality standards.
- Section 401 requires an applicant for any Federal permit that proposes an activity that may result in a discharge to "waters of the U.S." to obtain certification from the State that the discharge will comply with other provisions of the CWA. In California, a Water Quality Certification is provided by the State Water Resources Control Board and/or RWQCB.
- Section 402 establishes the National Pollutant Discharge Elimination System (NPDES), which is a permitting system for the discharge of any pollutant (except for dredge or fill material) into waters of the U.S. In California, this permit program is administered by the RWQCBs, and is discussed in detail below.

National Pollutant Discharge Elimination System

The CWA has nationally regulated the discharge of pollutants to the waters of the U.S. (e.g., streams, lakes, bays, etc.) from any point source since 1972. In 1987, amendments to the CWA added Section 402(p), which established a framework for regulating nonpoint source stormwater discharges under the National Pollutant Discharge Elimination System (NPDES) permit program. These regulations are implemented at the regional level by the Regional Water Quality Control Boards (RWQCBs). The Town of Hillsborough is within the jurisdiction of the San Francisco Bay RWQCB.

National Flood Insurance Program

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

State

Porter-Cologne Water Quality Control Act

The state's Porter-Cologne Water Quality Control Act, as revised in December 2007 (California Water Code Sections 13000-14290), provides for protection of the quality of all waters of the State of California for use and enjoyment by the people of California. It further provides that all activities that may affect the quality of waters of the state shall be regulated to obtain the highest water quality that is reasonable, considering all demands being made and to be made on those waters. The Act also establishes provisions for a statewide program for the control of water quality, recognizing that waters of the state are increasingly influenced by interbasin water development projects and other statewide considerations, and that factors such as precipitation, topography, population, recreation, agriculture, industry, and economic development vary regionally within the State. The statewide program for water quality control is, therefore, administered most effectively on a local level with statewide oversight. Within this framework, the Act authorizes the State Water Resources Control Board and RWQCBs to oversee the coordination and control of water quality within California.

State Water Resources Control Board

Created by the California State Legislature in 1967, the State Water Resources Control Board holds authority over water resources allocation and water quality protection within the State. The five-member State Water Resources Control Board allocates water rights, adjudicates water right disputes, develops statewide water protection plans, establishes water quality standards, and guides the nine RWQCBs. The mission of the State Water Resources Control Board is to, "preserve, enhance, and restore the quality of California's water resources, and ensure their proper allocation and efficient use for the benefit of present and future generations." The proposed Project is under the jurisdiction of the San Francisco Bay RWQCB.

Statewide Construction General Permit

The SWRCB has implemented an NPDES General Construction Permit for the State of California (Construction General Permit). Development sites that disturb one or more acres of land or that are less than one acre but are part of a larger common plan of development require permit coverage and must comply with the Construction General Permit,[34] which requires that project proponents prepare site drawings and maps, a Stormwater Pollution Prevention Plan (SWPPP) for short-term construction-related water quality impacts, applicable post-construction plans, and file of a Notice of Intent with the SWRCB. The Construction General Permit includes requirements for training, inspections, record keeping, and, for projects of certain risk levels, monitoring. The general purpose of the requirements is to minimize the discharge of pollutants and to protect beneficial uses and receiving waters from the adverse effects of construction-related stormwater discharges.

General Plan Law (California Government Code §65302(g)(1))

Government Code §65302(g)(1) requires safety elements to address the protection of the community from any unreasonable risks associated with the effects of dam failure; and ; flooding;.

[34] Projects are not considered part of a larger common plan of development if separated by ¼ mile or more.

New State law, including Senate Bill (SB) 379 and SB 1035 requires safety elements to address climate adaptation and resiliency planning, as well as new information relating to flood and fire hazards. SB 379 is the foundation for adaptation and resiliency in general plan safety elements—it requires local governments to conduct vulnerability assessments as part of their long-range public safety planning efforts and prepare policies that will protect against harm caused by climate change. SB 1035 builds on earlier legislation and requires local governments to review and update their safety elements if needed during an update to their housing element or local hazard mitigation plan, or at least once every eight years. Any revisions should include updated information related to flood hazards, fire hazards, and climate adaptation and resilience. In 2018, California Senate Bill (SB) 1035 revised California Government Code § 65302(g) to require General Plan Safety Elements to address climate adaptation and resiliency. After 2022, the Safety Element is to be updated upon each revision of the housing element or local hazard mitigation plan (LHMP), but no less than once every eight years to address new information or changing conditions.

Regional

San Francisco Bay Basin Plan

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

Municipal Regional Permit Provision C.3.

The San Francisco Bay RWQCB most recently re-issued the Municipal Regional Stormwater NPDES Permit (MRP) in May 2022 (Order No. R2-2022-0018, NPDES Permit No. CAS612008) to regulate stormwater discharges from municipalities and local agencies (co-permittees) in Alameda, Contra Costa, San Mateo, and Santa Clara Counties, and the cities of Fairfield, Suisun City, and Vallejo. Under Provision C.3 of the MRP, regulated projects include new development projects that create 5,000 square feet or more of impervious surface (collectively over the entire project site) including commercial, industrial, residential housing subdivisions (i.e., detached single-family home subdivisions, multi-family attached subdivisions (town homes), condominiums, and apartments), mixed-use, and public projects (other than public road projects), including sidewalks and any other portions of the public right of way that are developed or redeveloped as part of the projects. This category includes development projects on public or private land that fall under the planning and building authority of a Permittee. Regulated Projects are required to implement LID source control, site design, and stormwater treatment onsite or at a joint stormwater treatment facility, meaning a stormwater treatment facility built to treat the combined runoff from two or more Regulated Projects.

LID-based treatment controls are intended to maintain or restore the site's natural hydrologic functions, maximizing opportunities for infiltration and evapotranspiration, and using stormwater as a resource (e.g., rainwater harvesting for non-potable uses). The MRP also requires that stormwater treatment measures be properly installed, operated, and maintained.

In addition to water quality controls, the MRP requires new development and redevelopment projects that create or replace one acre or more of impervious surface to manage development-related increases in peak runoff flow, volume, and duration, where such hydromodification is likely to cause increased erosion, silt pollutant generation, or other impacts to local rivers, streams, and creeks.

Projects may be deemed exempt from these requirements if they do not meet the minimum size threshold, drain into tidally influenced areas or directly into the Bay, or drain into hardened channels, or if they are infill projects in subwatersheds or catchment areas that are greater than or equal to 65 percent impervious.

Municipal Regional Permit Provision C.12.f

Provision C.12.f of the MRP requires co-permittee agencies to implement a control program for PCBs that reduces PCB loads by a specified amount during the term of the permit, thereby making substantial progress toward achieving the urban runoff PCBs wasteload allocation in the Basin Plan by March 2030. Programs must include focused implementation of PCB control measures, such as source control, treatment control, and pollution prevention strategies. Municipalities throughout the Bay Area are updating their demolition permit processes to incorporate the management of PCBs in demolition building materials to ensure PCBs are not discharged to storm drains during demolition. As of July 1, 2019, buildings constructed between 1955 and 1978 that are proposed for demolition must be screened for the presence of PCBs prior to the issuance of a demolition permit.

San Mateo Countywide Water Pollution Prevention Program

The San Mateo Countywide Water Pollution Prevention Program (SMCWPPP) is the local agency responsible for the oversight of implementation of the applicable provisions, including Provision C.3, of the MRP by local jurisdictions within San Mateo County.

Dam Safety

Dam failure is the uncontrolled release of impounded water behind a dam. Flooding, earthquakes, blockages, landslides, lack of maintenance, improper operation, poor construction, vandalism, and terrorism can all cause a dam to fail. Because dam failure that results in downstream flooding may affect life and property, dam safety is regulated at both the federal and state level. Dams under the jurisdiction of the California Division of Safety of Dams are identified in California Water Code Sections 6002, 6003, and 6004 and regulations for dams and reservoirs are included in the California Code of Regulations. In accordance with the state's Dam Safety Act, dams are inspected regularly and detailed evacuation procedures have been prepared for each dam. According to maps published by San Mateo County, there are four dam failure inundation areas within the Town of Hillsborough.

Local

Hillsborough General Plan

The Open Space and Conservation Element and the Public Safety Element in the Town's General Plan contain the following hydrology and water quality goals, policies, and actions relevant to the proposed Project:

Goal OSC-4 - Minimize the impact of urban development on creeks and maintain a high level of water quality.

Policy OSC-4.1 - Control and monitor development and activities along the creeks to avoid negative impacts from urban uses on water quality and habitat preservation and enhancement, as well as to protect the public health and safety of public and private property.

Policy OSC-4.2 - Encourage development to follow watershed-based planning and zoning by examining proposed development in the context of the entire watershed and subwatershed.

Policy OSC-4.3 - Protect drainage facilities, including ensuring creekbank stability, to avoid negative impacts to downstream hydrology.

Policy OSC-4.4 - Require projects to reduce, to the extent feasible, potential sediment discharge, erosion, run-off flow and volume, and stormwater pollution, both during construction, as well as post-construction. Require projects to incorporate mitigation measures, such as Best Management Practices (BMPs), to address these water quality impacts, especially if proposing construction during the wet season.

Policy OSC-4.5 - Reduce the amount of hazardous wastes entering into the local and regional waterways by:

- Prohibiting the illicit dumping of wastes into storm drains, creeks and other waterways.
- Prohibiting the discharge of pollutants to the maximum extent practicable.
- Encouraging the use of naturally pest-resistant landscaping and design features that reduce the need for chemical treatments, and incorporate stormwater detention and retention into their design, when appropriate.

Policy OSC-4.6 - Reduce surface run-off by minimizing impervious surfaces associated with motorized vehicles, as well as requiring projects to include site designs that minimize impervious surfaces and maximize on-site filtration.

Policy OSC-4.7 - Require property owners to work with the natural topography and drainages to the extent feasible when designing development projects to reduce the amount of grading necessary and limit the disturbances to natural water bodies and drainage systems.

Action OSC-4.1 - The Town will adopt and implement a Creek Protection Ordinance to

ensure that new development does not have a negative impact upon the hydrology and riparian habitat of existing creeks and streams as well as to protect the health of the watersheds, consistent with the goals and policies contained in this Element.

Action OSC-4.2 - As co-permittee, the Town will continue to participate in the San Mateo Stormwater Pollution Prevention Program (STOPPP) or equal program. New development and Town activities will be reviewed for compliance with STOPPP as part of project approval. The Town will also monitor construction to ensure compliance with any required mitigation.

Goal PS-2 - Reduce risk of landslide and slope failure during and after heavy rains and earthquakes, and protect the community from hazards associated with soil erosion, weak and expansive soils and slope instability.

Policy PS-2.1 - Minimize development in areas of natural hazards, such as landslides and floodplains, which have the potential to jeopardize the public health and safety.

Policy PS-2.5 - Review drainage plans for new development to determine areas susceptible to poor drainage and compare with areas susceptible to slope failure.

Goal PS-4 - Reduce hazards related to natural flooding and potential inundation from failure of the Lower Crystal Springs Dam and the Crocker and Spencer Lake dams.

Policy PS-4.1 - Limit development within the floodplain to minimize risks to life and property and satisfy the flood insurance and other requirements of the Federal Emergency Management Act.

Policy PS-4.2 - Continue to monitor and maintain the dams at Crocker and Spencer Lakes to minimize the risk of dam failure, and support the San Francisco Public Utilities Commission's monitoring and maintenance of the Lower Crystal Springs Dam.

Action PS-4.1 - The Town will continue to participate in the National Flood Insurance Program.

Action PS-4.2 - The Town will continue to enforce existing ordinances for floodplain regulations, drainage requirements and development standards.

Hillsborough Municipal Code

Five chapters of the Hillsborough Municipal Code contain regulations pertaining to hydrology and water quality issues that are relevant to the proposed Project, as described below.

Chapter 13.50 - Stormwater Management and Discharge Control

Chapter 13.50 prohibits the discharge of non-stormwater into the city storm sewer system; calls for using measures to reduce pollutants from entering the storm sewer system; and establishes best management practices (BMPs) for new developments and redevelopments.

Chapter 15.24 - Grading

Chapter 15.24 includes provisions for all grading activities to comply with the Town's current National Pollutant Discharge Elimination System (NPDES) permit.

Chapter 15.29 - Water Conservation in Landscape Requirements

Section 15.29.120 (Stormwater management) requires stormwater best management practices to be incorporated into landscape and grading design plans to minimize runoff and to increase on-site retention and infiltration, consistent with NPDES and other applicable stormwater management requirements.

Chapter 15.44 - Floodplain Management

Chapter 15.44 applies to all areas of special flood hazards within the jurisdiction of the Town. This chapter adopts the Federal Emergency Management Agency's (FEMA) areas of special

flood hazard and establishes provisions for flood hazard reduction related to new construction and substantial improvements. Compliance with Chapter 15.44.030 requires approval of a development permit before any construction or other development begins within any area of special flood hazard from the floodplain administrator for the Town of Hillsborough (i.e., the Town Engineer) that includes plans in duplicate drawn to scale showing the nature, location, dimension, and elevation of the areas in question, existing or proposed structures, fill, storage of materials, drainage facilities and the location of the foregoing. Additional standards for development in areas of special flood hazards including but are not limited to: using building materials and utility equipment resistant to flood damage; using methods and practices that minimize flood damage; preventing water from entering or accumulating within the components of electrical, plumbing, and HVAC systems during conditions of flooding; raising buildings and structures a specified amount above the base flood elevation; floodproofing occupied and non-occupied structures; incorporating flood protection into subdivision proposals; and prohibiting encroachments and other development in areas designated as floodways unless certification by a registered professional engineer or architect is provided demonstrating that encroachments shall not result in any increase in the base flood elevation during the occurrence of the base flood discharge.

Chapter 16.28 - Public Improvement Standards

Chapter 16.28 requires installation of sufficient storm drainage facilities to prevent flooding or inundation of streets and to provide sufficient means to dispose of normal water flow and protect pavements against deterioration. In addition, where substantial changes to existing drainage patterns are proposed, storm drainage shall not be directed onto adjacent properties by surface flows or point discharges or other outlets unless connected directly to an approved public drainage facility.

4.9.3 Thresholds of Significance

Potential impacts to aesthetic resources were determined in accordance with Appendix G of the CEQA Guidelines. Impacts would be considered potentially significant if the proposed Project will:

A. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.

B. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.

C. 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:

    1. Result in substantial erosion or siltation on- or off-site;

    2. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

3. 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

4. Impede or redirect flood flows.

D. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.

E. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

4.9.4 Impacts and Mitigation Measures

The proposed Project consists of updates to the existing 2014 - 2022 Housing Element to reflect the 6th cycle 2023 – 2031 housing assignments; associated amendments to the Land Use Element and General Plan Land Use Map, Open Space and Conservation Element, and Public Safety Element; amendments to Title 17 (Zoning) of the Hillsborough Municipal Code, and amendments to the Hillsborough Zoning Map. These amendments are generally described in sections 3.3.9 through 3.3.12 in Project Description. The proposed amendments described in the Project Description would not result in environmental impacts to hydrology and water quality and are therefore not discussed further in this chapter. The impact analysis focuses on the residential development that would be facilitated by the Draft 2023 – 2031 Housing Element.

Impact HYD-1 – Water Quality Impacts. *[Threshold of Significance (a)]*

Water quality in the Planning Area and surrounding jurisdictions is regulated by a number of federal, State, and county laws and regulations. Stormwater runoff from the Planning Area eventually discharges to San Francisco Bay via a network of creek channels and sloughs (receiving waters) as described above in Section 4.9.1. The Town's storm drain system collects stormwater runoff and discharges it directly into receiving waters without any treatment for removal of contaminants. San Francisco Bay has impaired water quality due to pollutants, including trash, metals (copper, lead, zinc) oil and grease that are carried by stormwater runoff. Metals, oil and grease are common stormwater runoff pollutants associated with roads and parking lots. Other sources of these pollutants include building materials (such as galvanized steel) in developed areas that are exposed to rain. Erosion and sedimentation from construction sites also contribute to stormwater runoff pollution.

The Town's Geneal Plan contains existing goals, policies, and actions intended to protect water quality. The General Plan goals, policies, and actions more relevant to reducing potential Project water quality impacts include:

Goal OSC-4 - Minimize the impact of urban development on creeks and maintain a high level of water quality.

> *Policy OSC-4.1* - Control and monitor development and activities along the creeks to avoid negative impacts from urban uses on water quality and habitat preservation and enhancement, as well as to protect the public health and safety of public and private property.

Policy OSC-4.2 - Encourage development to follow watershed-based planning and zoning by examining proposed development in the context of the entire watershed and subwatershed.

Policy OSC-4.4 - Require projects to reduce, to the extent feasible, potential sediment discharge, erosion, run-off flow and volume, and stormwater pollution, both during construction, as well as post-construction. Require projects to incorporate mitigation measures, such as Best Management Practices (BMPs), to address these water quality impacts, especially if proposing construction during the wet season.

Policy OSC-4.5 - Reduce the amount of hazardous wastes entering into the local and regional waterways by:

- Prohibiting the illicit dumping of wastes into storm drains, creeks and other waterways.
- Prohibiting the discharge of pollutants to the maximum extent practicable.
- Encouraging the use of naturally pest-resistant landscaping and design features that reduce the need for chemical treatments, and incorporate stormwater detention and retention into their design, when appropriate.

Policy OSC-4.6 - Reduce surface run-off by minimizing impervious surfaces associated with motorized vehicles, as well as requiring projects to include site designs that minimize impervious surfaces and maximize on-site filtration.

Policy OSC-4.7 - Require property owners to work with the natural topography and drainages to the extent feasible when designing development projects to reduce the amount of grading necessary and limit the disturbances to natural water bodies and drainage systems.

Action OSC-4.2 - As co-permittee, the Town will continue to participate in the San Mateo Stormwater Pollution Prevention Program (STOPPP) or equal program. New development and Town activities will be reviewed for compliance with STOPPP as part of project approval. The Town will also monitor construction to ensure compliance with any required mitigation.

In addition to existing General Plan goals, policies, and actions, the Town's Municipal Code requirements related to water quality, including Chapter 13.50 (Stormwater management and discharge control), Chapter 15.24 (Grading), Chapter 15.29 (Water conservation in landscape requirements), Chapter 16.28 (Public improvement standards), and the building permit requirements would reduce the potential water quality impacts of future potential residential development that may be facilitated by the Project.

New residential development that may be facilitated by implementation of the Project would also be subject to the applicable provisions of the Municipal Regional Permit (MRP) (Order No. R2-2022-0018, NPDES Permit No. CAS612008), primarily Provision C.3 which requires the implementation of proper site design, pollutant source controls and on-site LID-based runoff treatment controls in new development projects. Under Provision C.3 of the recently re-issued MRP, regulated projects include new development projects that create 5,000 square feet or more of impervious surface (collectively over the entire project site) including commercial, industrial, residential housing subdivisions (i.e., detached single-family home subdivisions, multi-family attached subdivisions (town homes), condominiums, and apartments), mixed-use,

and public projects (other than public road projects), including sidewalks and any other portions of the public right of way that are developed or redeveloped as part of the projects. This category includes development projects on public or private land that fall under the planning and building authority of a Permittee. Regulated Projects are required to implement LID source control, site design, and stormwater treatment onsite or at a joint stormwater treatment facility, meaning a stormwater treatment facility built to treat the combined runoff from two or more Regulated Projects. As a co-permittee of the MRP, the Town of Hillsborough would be responsible for the review, approval, and implementation of these measures, as well as with the implementation of the applicable requirements of statewide regulations such as the Construction General Permit during the construction phases of new development.

The Town's implementation of State, regional, and local stormwater regulations, and development project compliance with said regulations, would ensure potential Project impacts on surface water quality would be ***less than significant***.

Impact HYD-2 – Groundwater Recharge and Groundwater Management Impacts. *[Threshold of Significance (b)]*

There are nine groundwater basins with boundaries –either partial or whole—within San Mateo County. The Town lies immediately adjacent to the western edge of the approximately 60,000-acre San Mateo Plain Groundwater Basin, except for the northerly end of the Brewer Subdivision, which lies inside the basin boundary.[35] The San Mateo Plain Subbasin underlies the bayside of San Mateo County from approximately the City of San Mateo on the north, to approximately the County boundary at San Francisquito Creek on the south. Currently, there is no entity actively managing the basin.

Implementation of the proposed Project would result in an increase in water demand compared to existing conditions. However, groundwater is not used for municipal supply in Hillsborough. The San Francisco Public Utilities Commission (SFPUC) would provide potable water for new development in the Town. SFPUC does not use groundwater supplies to meet demand. Since the Project would not develop or increase the use of groundwater supplies, implementation of the Project would not impact groundwater supplies. Further, new or redevelopment projects would include the installation of LID-based runoff treatment controls in conformance with the MRP, which would also increase the amount of pervious area on the (non-vacant) Housing Opportunity Sites and allow for greater groundwater recharge at the sites compared to existing conditions. Therefore, the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. No impact would occur.

Impact HYD-3 – Stormwater Runoff and Drainage Impacts. *[Threshold of Significance (c)]*

The Town's General Plan contains goals, policies, and actions intended to reduce runoff quantities and protect against flooding, including the following:

Goal OSC-4 - Minimize the impact of urban development on creeks and maintain a high level of water quality.

[35] San Mateo County Office of Sustainability. Groundwater. Accessed at: https://www.smcsustainability.org/water/groundwater/ on August 23, 2023.

Policy OSC-4.1 - Control and monitor development and activities along the creeks to avoid negative impacts from urban uses on water quality and habitat preservation and enhancement, as well as to protect the public health and safety of public and private property.

Policy OSC-4.2 - Encourage development to follow watershed-based planning and zoning by examining proposed development in the context of the entire watershed and subwatershed.

Policy OSC-4.3 - Protect drainage facilities, including ensuring creekbank stability, to avoid negative impacts to downstream hydrology.

Policy OSC-4.4 - Require projects to reduce, to the extent feasible, potential sediment discharge, erosion, run-off flow and volume, and stormwater pollution, both during construction, as well as post-construction. Require projects to incorporate mitigation measures, such as Best Management Practices (BMPs), to address these water quality impacts, especially if proposing construction during the wet season.

Policy OSC-4.6 - Reduce surface run-off by minimizing impervious surfaces associated with motorized vehicles, as well as requiring projects to include site designs that minimize impervious surfaces and maximize on-site filtration.

Goal PS-2 - Reduce risk of landslide and slope failure during and after heavy rains and earthquakes, and protect the community from hazards associated with soil erosion, weak and expansive soils and slope instability.

Policy PS-2.5 - Review drainage plans for new development to determine areas susceptible to poor drainage and compare with areas susceptible to slope failure.

Goal PS-4 - Reduce hazards related to natural flooding and potential inundation from failure of the Lower Crystal Springs Dam and the Crocker and Spencer Lake dams.

Policy PS-4.1 - Limit development within the floodplain to minimize risks to life and property and satisfy the flood insurance and other requirements of the Federal Emergency Management Act.

Action PS-4.1 - The Town will continue to participate in the National Flood Insurance Program.

Action PS-4.2 - The Town will continue to enforce existing ordinances for floodplain regulations, drainage requirements and development standards.

Potential future residential development facilitated by the Project would occur in existing developed areas, primarily on opportunity sites that are currently vacant. This potential future development would be required to comply with State (MRP) and County (SMCWPPP) stormwater management standards, including construction period requirements and post-construction site design requirements for new development projects that create 5,000 square feet or more of impervious surface. This category includes development projects on public or private land that fall under the planning and building authority of a Permittee. MRP Regulated Projects are required to implement LID source control, site design, and stormwater treatment onsite or at a joint stormwater treatment facility, meaning a stormwater treatment facility built to treat the combined runoff from two or more Regulated Projects. Standard construction period requirements applicable to potential residential development facilitated by the Project include

preparation of an Erosion Sediment Control Plan to reduce on-site erosion and off-site siltation (Hillsborough Municipal Code Section 15.24.040), and if disturbing more than one acre of ground, State General Construction Permit requirements including preparation of a Stormwater Pollution Prevention Plan. Standard post-construction period requirements as established by the MRP include (1) site design measures to minimize impervious surfaces, or reduce runoff by dispersing it to landscaping or using pervious pavements; and (2) use of low-impact development techniques to result in no net increase in drainage off-site compared to pre-project site hydrology. All these stormwater management measures and techniques are designed to reduce the volume and rate of stormwater and allow water to infiltrate the underlying soil naturally, or capture water for reuse such as a rain barrel or cistern for irrigation purposes. These measures would reduce the effects of new or replaced impervious surfaces due to potential future development facilitated by the Project.

Future residential projects located within the Special Flood Hazard Areas (SFHAs) would also be subject to FEMA restrictions and applicable provisions of the Town's Municipal Code and General Plan related to floodplain management. As previously stated, Chapter 15.44 of the Municipal Code (Floodplain Management) establishes construction requirements for development that would minimize flood hazard risks, including building material selection, building and structure elevation, building and site flood-proofing, and standards for utilities, subdivisions, and residential construction.

Project compliance with State and County stormwater management measures and existing Town General Plan policies and Municipal Code regulations would ensure that impacts on drainage and related effects on erosion or siltation, on- or off-site flooding, redirecting of flood flows, creating substantial additional sources of polluted runoff, or exceeding stormwater drainage system capacity from future development facilitated by the Project would be ***less than significant***.

Impact HYD-4 – Risks from Pollutant Release due to Project Inundation. *[Threshold of Significance (d)]*

If inundated by flood waters residential properties could contaminate flood waters with common household products such as fertilizers, herbicides/pesticides, paints, cleaning fluids, pool chemicals, and other toxic products commonly associated with residential land uses.

As previously stated, the Planning Area includes areas subject to inundation by the 100-year and 500-year floods (see Figure 4.9-1). It should be noted that, while the Town does not formally contain many 100-year SFHAs, the Town is located immediately adjacent to extensive 100-year flood zones mapped in the City of Burlingame and, to a lesser extent, the City of San Mateo, along the northeastern Town boundary. Flood waters in these adjacent areas could easily enter the Town. The only 500-year flood zone mapped in Town is along San Mateo Creek.

Most of the Draft 2023 – 2031 Housing Element Housing Opportunity Sites are located in the Hillsborough hills and, as a result, are not located in the vicinity of a 100- or 500-year flood zone. However, the Town Hall Complex Opportunity Site is located directly adjacent to a 100-year flood zone. Portions of the Burlingame Country Club Opportunity Site are located near (i.e., within approximately 750 feet) a 100-year flood zone. Several vacant Housing Opportunity Sites are located near (i.e., within approximately 1,500 feet at the nearest point) 100-year flood zones. Considering ADUs can be constructed on any residential parcel in the Town, ADU sites could be located in or adjacent to a 100-year or 500-year flood zone, including the 500-year

flood zone associated with San Mateo Creek, the only 500-year flood zone mapped within Town boundaries.

A tsunami is a large tidal wave generated by an earthquake, landslide, or volcanic eruption. Tsunami inundation maps have been developed that show tsunami hazard zones for the San Francisco Bay area. There are no tsunami hazard areas within the Town of Hillsborough; therefore, the Planning Area would not be subject to flooding from a tsunami (California Department of Conservation 2021).

Seiches are waves that oscillate in enclosed water bodies, such as reservoirs, lakes, ponds, swimming pools, or semi-enclosed bodies of water, such as San Francisco Bay. The Planning Area is located approximately one mile west of the San Francisco Bay at the nearest point. According to the County of San Mateo, the Town of Hillsborough does not contain any seiche inundation areas (County of San Mateo 2023).

Although certain areas of the Town are at risk of inundation from flooding during storm events, the risk of flooding would be reduced through compliance with the City's Municipal Code Chapter 15.44 (Floodplain Management). Section 15.44.030 requires a development permit to be obtained before construction begins in a SFHA. Municipal Code Section 15.44.040 sets forth site design and construction requirements for flood hazard reduction.

The General Plan contains existing goals, policies, and actions to reduce hazards associated with flooding and inundation. Relevant General Plan goals, policies, and actions that would help reduce potential Project impacts include:

Goal PS-4 - Reduce hazards related to natural flooding and potential inundation from failure of the Lower Crystal Springs Dam and the Crocker and Spencer Lake dams.

Policy PS-4.1 - Limit development within the floodplain to minimize risks to life and property and satisfy the flood insurance and other requirements of the Federal Emergency Management Act.

Policy PS-4.2 - Continue to monitor and maintain the dams at Crocker and Spencer Lakes to minimize the risk of dam failure, and support the San Francisco Public Utilities Commission's monitoring and maintenance of the Lower Crystal Springs Dam.

Action PS-4.1 - The Town will continue to participate in the National Flood Insurance Program.

Action PS-4.2 - The Town will continue to enforce existing ordinances for floodplain regulations, drainage requirements and development standards.

Compliance with Chapter 15.44 of the Municipal Code would identify measures to help prepare future development sites in the event of a flood and would help reduce the potential for pollutants at known contamination sites within and adjacent SFHAs from being released into the environment in the event of a flood.

In addition to Municipal Code requirements, post-construction BMPs are required to protect water quality at development sites to comply with C.3 provisions of the MRP. Project applicants would be required to prepare Stormwater Operations and Maintenance Plans which detail stormwater pollutant source controls to be incorporated into project design. The risk of pollutant release due to new project inundation is expected to be low based on the requirements set forth in the Town's Municipal Code and MRP Provision C.3.

As described in Section 4.9.2, California Government Code §65302(g) was amended in 2018 via SB 1035 to require Safety Elements to address climate adaptation and resiliency planning as well as incorporate new information on changing conditions related to flooding, sea level rise, and resiliency planning upon each revision of the Housing Element or local hazard mitigation plan (LHMP) after 2022. The Town of Hillsborough is not currently updating its Public Safety Element as part of this Project. As such, the Town has not yet completed Public Safety Element or Municipal Code updates (if necessary) to respond to this recent State law.

Acknowledged in Government Code §65302(g) is the potential for climate change to indirectly cause or exacerbate sea level rise, flooding, and extreme storm events. Rising sea levels and projected increases in extreme precipitation events, in combination with poor drainage conditions, can increase the likelihood and severity of flooding. Even jurisdictions that do not contain San Francisco Bay shoreline areas are subject the effects of sea level rise as creeks and streams that drain to the Bay are predicted to back-up during storm events and king tides and will not be able to discharge the stormwater runoff to the Bay under rising sea level conditions. This could cause flooding as the stormwater backs up in the drainage channels and is not discharged to the Bay. As such, jurisdictions are required to incorporate climate adaptation and resiliency strategies to address climate-change induced hazards, including flooding in their updated Safety Elements.

While none of the Town's boundaries directly border the San Francisco Bay shoreline, the effects of sea level rise on inland flooding are increasingly being studied, documented, and recommended for consideration in local flood hazard management and adaption. San Mateo County's Flood & Sea Level Rise Resiliency District, OneShoreline, in its Planning Policy Guidance recommends jurisdictions address the low-lying communities located inland from the Bay that could experience flooding impacts from rising shallow groundwater and the inability of creeks to discharge stormwater to the Bay long before sea level rise overtops the Bay shoreline. The addition of the 554 new housing units anticipated by Focused GPU implementation could result in potentially significant flooding impacts if the design and development of the new housing is not responsive to changing flood hazard conditions induced by climate change, including extreme precipitation events to result in more severe inland flooding impacts.

Existing General Plan policies, Municipal Code requirements, MRP requirements, and FEMA floodplain development standards would reduce potential Project-related flooding impacts to a certain extent; however, additional measures are needed to ensure new housing development that could be constructed adequately accounts for the increasing risk of climate-change induced flooding the absence of updated Public Safety Element policies addressing these issues. Mitigation Measure HYD-1 is included to reduce potentially significant flooding and pollutant release impacts associated with future residential development that may be facilitated by the Focused GPU.

Impact HYD-1: Development of the Draft 2023 – 2031 Housing Element Housing Opportunity Sites could have potentially significant flooding-related impacts, particularly considering the existing General Plan goals, policies, and actions to which the new housing development would be subject do not reflect recent State law requirements.

Mitigation Measure HYD-1: Update General Plan Public Safety Element. Prior to the issuance of building permit(s) for any of the Draft 2023 – 2031 Housing Element Housing Opportunity Sites, the Town shall develop and adopt Geneal Plan Public Safety Element goals,

policies, and actions consistent with the requirements of Government Code §65302(g) and as addressed in OneShoreline's "Planning Policy Guidance to Protect and Enhance Bay Shoreline Areas of San Mateo County" that include the following:

- Review and use the best available science and projections of future conditions to identify the areas that are vulnerable to inland flooding exacerbated by sea level rise, shallow groundwater rise, and extreme precipitation events. Use this information to continue to develop or adjust planning and adaptation strategies.
- Integrate planning for future sea level rise, shallow groundwater rise, and extreme precipitation events and their potential effects on inland flooding into all relevant Town processes related to development, including zoning ordinance updates and entitlement of new and/or substantial construction.
- Ensure that new and/or substantial construction is planned and designed to accommodate future conditions for the life of the development project.

As stated in sections 3.3.9 through 3.3.12 in Chapter 3 Project Description, the Project includes action items to implement Mitigation Measure HYD-1. The Town has not yet developed new or revised Public Safety Element goals, policies, or actions to implement Mitigation Measure HYD-1, and the exact language that would be used to implement Mitigation Measure HYD-1 is not known. As such, it cannot be guaranteed at this time that the forthcoming goals, policies, and/or actions to implement HYD-1 would reduce the effects of future residential development facilitated by the Project related to flooding and pollutant release sufficiently to reduce potential effects to less than significant. Therefore, this impact would be ***significant and unavoidable***.

Impact HYD-5 – Conflicts with Water Quality Control or Sustainable Groundwater Management Plans. *[Threshold of Significance (e)]*

The Project, which would allow increases in the number of housing units to be built in the City, would not conflict with or obstruct the implementation of any water quality control plans or sustainable groundwater management plan. Conformance with regulatory requirements for surface water quality protection and reducing flooding risks, as described under Impact HYD-4, would be required of all new or redevelopment projects in the Town. As such, Project impacts related to water quality would be ***less than significant***. As discussed under Impact HYD-2, the Project would not impact existing groundwater supplies.

4.9.5 References

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4.10 Land Use

4.10.1 Environmental Setting

Planning Area

The Town of Hillsborough encompasses 6.23 square miles, or 3,987 acres. The Planning Area includes the Town's 3,987 acres and approximately 888 acres of sphere of influence (SOI) area, for a total of approximately 4,875 acres. The SOI includes three areas of unincorporated San Mateo County: unincorporated land east of I-280 between the Town limit and the City of Burlingame, in the north; the San Francisco Public Utilities Commission (SFPUC) parcel located along Hillsborough's western boundary, between I-280 and Black Mountain Road; and unincorporated land east of I-280 between the Town limit and the City of San Mateo in the south.

The Town is unique in that it consists mainly of low-density single-family residential development, with a minimum lot size of ½ acre, with no commercial or industrial uses. The majority of the residents have shown interest over the years in maintaining a lower density residential community and preserving the low-density residential character through preservation of large lots, open space, and mature trees (Hillsborough 2005).

The only non-residential uses within the Town are public facilities, parks and open space land, private and public schools, the Burlingame Country Club, and the Hillsborough Racquet Club.

While there is limited land available for additional housing and the possibility of slight change on the non-residential parcels, Hillsborough is mainly built-out. Therefore, an important issue related to community character is how new development fits into the existing fabric of the community and how established neighborhoods should evolve over time. The Town has an Architectural Design Review Board to review development proposals and ensure that they are appropriate for the Town.

Existing General Plan Land Use Designations

Residential uses are the predominant land use in Hillsborough and account for a significant portion of the total land area. The Town does not contain any commercial or industrial land uses; these land uses are prohibited. The existing General Plan Land Use Map is included as Figure 3.3-1: Existing General Plan Land Use Map, and the existing Zoning Map is Figure 3.3-2, both included in the Chapter 3 Project Description. The following outlines the allowable land uses for each land use designation.

Residential Uses (R). Residential land uses are the largest land use in the Planning Area. The Residential land use designation allows for the development of single-family dwellings in a manner that is consistent with the existing character of the community. Additional uses that may be allowed include home businesses, second units, family day care homes and other compatible uses identified in the Hillsborough Municipal Code. The Residential Uses designation also permits multi-family housing, but the Town currently has very few multi-family housing units. The maximum allowed density is one single-family dwelling per ½ acre. For subdivisions resulting in five or more units, a conceptual plan is required. Residential land uses are found distributed throughout the extent of the Planning Area.

Accessory dwelling units (ADUs) are another form of residential development found in Hillsborough. Hillsborough allows attached and detached ADUs and Junior Accessory Dwelling Units (JADUs) on lots with a proposed or existing single-family dwelling units and on lots with multi-family dwelling units, as required by State Law, subject to the requirements contained within Zoning Code Chapter 17.52.

Public Facilities and Services (PFS). The Public Facilities and Services land use designation allows for the development and operation of services and facilities that are necessary to meet the community's needs, while maintaining the character of the community. Allowable uses include public schools, Town Hall, fire and police facilities, other governmental facilities, parks, and other recreational facilities.

The maximum allowed intensity for the existing land currently designated Public Facilities and Services designation is 15 percent above the floor area ratio intensity in existence as of adoption of the 2005 General Plan. Prior to approving an increase in the intensity of development, a study must be completed by the Town to ensure that the increase is kept to the minimum necessary to allow for the continued provision of service.

Smaller, Town-owned parcels of land designated for Public Facilities and Services that contain water and sewer delivery and collection system uses or infrastructure, such as streets and power lines, are not subject to the maximum intensity of use limitations. This is to allow for adequate equipment and facilities to be installed on small, infill sites where needed to provide service to the immediate vicinity.

The Town has not identified a maximum intensity for public schools since the Town does not have direct control over the planning and development of public school property.

Private Schools (PS). The Private Schools designation includes private school facilities within Hillsborough. Allowable development and uses associated with private school operation are determined by City Council review and approval. In addition to activities directly related to the operation of a private school, residential dwellings for school employees may be allowed. Each private school is required to receive a permit from the Town. The maximum intensity for private schools is based on the number of students per acre.

Open Space and Conservation (OSC). The Open Space and Conservation designation is used to preserve environmentally sensitive areas and maintain a high quality of light, air, and scenic beauty in the community. Allowable uses include unimproved open space and public facilities. Since the Town does not want to encourage large amounts of new development within these areas, any increases in intensity of use, either resulting from the construction of facilities or allowing increased public use, will need to be approved on a case-by-case basis, with adequate public review. New construction should be limited to that necessary for continued maintenance and low intensity public enjoyment of the designated areas.

Private Recreational (PR). The Private Recreational designation includes recreational facilities within Hillsborough that are operated for private use. The two existing facilities, the Burlingame Country Club and the Hillsborough Racquet Club, were both formed before the Town's Residential District Ordinance was adopted. Allowed uses include the country club, with associated social and commercial uses, and the racquet club. In addition to activities directly related to the operation of the country club, residential dwellings for club employees may be allowed.

Vacant Land Uses. Little vacant land exists within Hillsborough. Vacant land is defined as having no building structures constructed on the land. Vacant land does not include parks or open space, which is "vacant" or open by design. Vacant land can occur in each of the General Plan and zoning designated areas.

Airport Land Use Planning

There are two airports in the vicinity of Hillsborough, the San Francisco International Airport (SFO) and the San Carlos Airport. The San Francisco Airport is approximately 1.8 miles northeast of the Town's northern boundary; the entire Town is located in Airport Influence Area A and a portion roughly north of Chateau Drive is located in Airport Influence Area B.[36] The San Carlos Airport is approximately 4.6 miles southeast of the Town's southern borders and a portion of the Town southeast of Chateau Drive/Ralston Avenue is within the San Carlos Airport's Area of Influence Boundary A; no portion of the Town is located within Area of Influence Boundary B.[37]

The City/County Association of Governments of San Mateo County (C/CAG) Board of Directors serves as the airport land use commission for San Mateo County. The Airport Land Use Commission reviews proposals for general plans, specific plans, zoning ordinances, and land use development proposals in the vicinity of the San Carlos Airport and San Fransico Airport to ensure that future land uses in the surrounding areas remain compatible with the realistically foreseeable, ultimate potential aircraft activity. The Commission adopted the Comprehensive Airport Land Use Compatibility Plan for the Environs of the San Carlos Airport in 2015 and the Comprehensive Airport Land Use Compatibility Plan for the Environs of the San Francisco International Airport in 2012. The Land Use Compatibility Plans for the San Carlos Airport and San Francisco Airport set forth land use compatibility criteria, compatibility zones, development standards, and policies pertaining to noise, safety, airspace protection, and overflight standards, and establishes the planning boundaries that define height, tall structures, noise, and safety zones for policy implementation.

4.10.2 Regulatory Setting

State

General Plan Law (California Government Code Section 65302)

A general plan must include a statement of development policies and a diagram or diagrams and text setting forth objectives, principles, standards, and plan proposals. A land use element that designates the proposed general distribution and general location and extent of the uses of the land for housing, business, industry, open space, including agriculture, natural resources, recreation and enjoyment of scenic beauty, education, public buildings and grounds, solid and liquid waste disposal facilities, and greenways, as defined in Section 816.52 of the Civil Code.

[36] City/County Association of Governments of San Mateo County, Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport, November 2012.

[37] City/County Association of Governments of San Mateo County, Final Comprehensive Airport Land Use Compatibility Plan For the Environs of San Carlos Airport, Adopted October 2015.

Regional/Local

Association of Bay Area Governments - Regional Housing Needs Allocation

Since 1969, the State of California has required each local government to plan for its share of the state's housing needs for people of all income levels. Through the RHNA process, every local jurisdiction is assigned a number of housing units representing its share of the state's housing needs for an eight-year period. State Housing Element Law requires the Association of Bay Area Governments (ABAG) to develop a methodology for distributing the Bay Area's portion of the state housing needs to local governments within the nine-county region.

ABAG adopted its final 2023 – 2031 RHNA plan for the Bay Area on December 16, 2021 and the HCD approved the plan on January 12, 2022. The region's nine counties and 101 cities are collectively responsible for developing 441,176 new housing units during the 2023 – 2031 period. The Town of Hillsborough's allocation is for 554 housing units during the 2023 – 2031 6th Cycle Housing Element.

Plan Bay Area 2050

The primary document and associated process used in implementing ABAG policies is *Plan Bay Area 2050*, adopted collectively by ABAG and the Metropolitan Transportation Commission (MTC) on October 21, 2021. *Plan Bay Area 2050* is the Bay Area's regional long-range plan for the nine-county San Francisco Bay Area. The plan was developed in collaboration with Bay Area residents, partner agencies, and nonprofit organizations. It lays out a $1.4 trillion vision for a more equitable and resilient future for Bay Area residents. Thirty-five strategies make up the heart of the plan to improve housing, the economy, transportation, and the environment across the Bay Area's nine counties and identifies a path to make the Bay Area more equitable for all residents and more resilient in the face of unexpected challenges.

The population in the region is expected to grow from around 7.8 million residents today to over 10 million residents by 2050. The region is forecast to add 1.4 million new jobs, for a total of 5.4 million Bay Area workers. *Plan Bay Area 2050* states that the Bay Area will need to build 1.36 million new homes by 2050 to meet this forecasted future demand.

Plan Bay Area 2050's core strategy is "focused growth" in existing communities along the existing transportation network. This strategy is intended to leverage existing infrastructure and minimize impacts to less developed areas. The focused growth strategy targets four types of Growth Geographies:

- Priority Development Areas (PDAs): Areas generally near existing job centers or frequent transit that are locally identified (i.e., identified by towns, cities or counties) for housing and job growth.
- Priority Production Areas (PPAs): Locally identified places for job growth in middle-wage industries like manufacturing, logistics or other trades. An area must be zoned for industrial use or have a predominantly industrial use to be a PPA.
- Transit-Rich Areas (TRAs): Areas near rail, ferry or frequent bus service that were not already identified as PDAs. Specifically, these are areas where at least 50 percent of the area is within 1/2 mile of either an existing rail station or ferry terminal (with bus or rail

service), a bus stop with peak service frequency of 15 minutes or less, or a planned rail station or planned ferry terminal (with bus or rail service).

- High-Resource Areas (HRAs): State-identified places with well-resourced schools and access to jobs and open space, among other advantages, that may have historically rejected more housing growth. This designation only includes places that meet a baseline transit service threshold of bus service with peak headways of 30 minutes or better.

San Mateo County Multi-Jurisdiction Local Hazard Mitigation Plan

This plan was adopted in 2021. San Mateo County and its incorporated cities have implemented land use plans and development policies to direct growth away from hazardous conditions. For example, as required by state law, the County and each incorporated city have a general plan with a safety element that identifies hazards affecting the unincorporated county and incorporated cities. The County and the incorporated cities implement planning policies, such as floodplain ordinances and building codes, restricting new development in hazard areas, and increasing construction requirements in hazard areas.[38]

Hillsborough General Plan

The Land Use, Circulation, Open Space and Conservation, and Housing Elements of the Town's General Plan contain goals, policies, and actions that guide land use decision-making. Relevant goals, policies and actions include:

Goal LU-1 - Provide for the preservation and enhancement of the Town's unique residential character.

Policy LU-1.1 - Maintain the character of the Town's neighborhoods.

Policy LU-1.2 - Promote property and landscape improvements and maintenance.

Policy LU-1.4 - Ensure that lighting on private and public property is designed to avoid illuminating adjacent properties and public rights-of-ways and does not contribute to an overall increase in the ambient lighting level of the community.

Policy LU-1.5 - Review Town regulations, including the Municipal Code and Residential Design Guidelines, on a regular basis to ensure that development within the Town occurs in a manner compatible with the Town's character.

Action LU-1.1 - The Architecture and Design Review Board will apply the Hillsborough Residential Design Guidelines when reviewing new construction and significant remodeling. The goals of the Guidelines include:

- Reinforcing Hillsborough's image
- Facilitating contemporary life
- Encouraging town-wide diversity

[38]County of San Mateo Executive's Office. https://www.smcgov.org/ceo/multijurisdictional-local-hazard-mitigation-plan. Accessed on August 29, 2023.

- Fostering creativity

Action LU-1.2 - The Town will enforce its Residential Landscaping requirements to maintain the attractive visual character of Hillsborough, as well as to promote water conservation.

Action LU-1.3 - The Town will enforce its Nuisance Ordinance, which allows for the clean-up of overgrown properties that pose a safety hazard or create a visual nuisance inconsistent with the character of Hillsborough.

Goal LU-2 - Provide for orderly development in a manner compatible with the existing character of Hillsborough.

Policy LU-2.1 - Ensure that regulations, requirements, and processing procedures are clear, precise and reflect Town policy.

Policy LU-2.2 - Continue to review new development proposals to ensure that they do not overwhelm their sites or their neighborhood.

Policy LU-2.3 - Continue to minimize land use conflicts within the Town where possible.

Policy LU-2.5 - Continue to require conceptual plans before applications for subdivisions of five lots or greater are submitted to the City Council. The Town's requirements for conceptual plans will be updated to require that during the preparation of a conceptual plan, special attention will be given to opportunities for:

- New recreational facilities, such as parks and trails
- Preservation of sensitive habitat areas in open space
- Multiple access points to the project to minimize the impacts

Goal LU-3 - Allow for the operation of facilities and schools, while minimizing potential conflicts with residential uses.

Policy LU-3.1 - Ensure that Town-owned public facilities are designed and operated in a manner that allows for the provision of high quality, cost effective public service, but also take into consideration surrounding residential land uses.

Goal LU-5 - Ensure that adequate review is completed prior to selling Town-owned property or purchasing or accepting dedications of land or facilities for residents' benefit or use.

Policy LU-5.3 - Ensure adequate review is completed as to the future need for Town-owned property prior to selling for private use.

Policy LU-5.4 - Balance the potential for immediate income resulting from the sale of Town-owned property with the need to retain property for future public facilities and services.

Goal C-1 - Provide for well-maintained, safe roads and encourage safe driving, bicycling and walking practices throughout the Town.

Policy C-1.5 - Maintain adequate emergency access for all land uses.

Goal C-3 - Ensure that there is adequate, safe parking to maintain good traffic flow and emergency access.

Policy C-3.1 - Encourage property owners to provide adequate parking to meet demand.

Policy C-3.2 - Continue to require property owners who are building a new house or remodeling/adding more than 50 percent to the living area of an existing house, to install parking strips, as a means to provide safer on-street parking. Once updated, parking strip requirements will reflect the need to continue to require parking strips in areas where the strips provide needed parking and safety, such as:

- Narrow streets where on-street parking without a parking strip may obstruct the flow of traffic.
- Areas near to major pedestrian destinations, such as schools and parks, where parking strips provide off-street pedestrian routes.

In addition to affirming areas where parking strips should continue to be required, the updated parking strip requirement will incorporate additional opportunities for flexibility, such as reducing or waiving the parking strip requirements. Opportunities where flexibility may be appropriate include:

- Non-residential properties where adequate off-street parking is available for visitors and where there are little or no adjacent residential uses that will generate the need for parking.
- Properties located on streets with little demand for parking and where parking strips on only a portion of the street frontage will provide adequate opportunities for safe, on-street parking.

Action C-3.1 - The Town will review all construction plans for conformance with Municipal Code parking requirements.

Policy OSC-1.3 - Review future subdivision proposals for the opportunity to incorporate new recreational opportunities into the site design and/or require parkland in-lieu fees.

Policy OSC-2.1 - Continue to maintain Town-owned open space in a manner that balances the need to protect natural habitat with controlling vegetation to reduce fuel loads, arrangements, and potential wildfire hazards.

Policy OSC-2.2 - Consider the limited public use of Town-owned public open space, where appropriate, in a manner that considers mitigation of impacts on adjacent neighbors and natural resources and does not conflict with existing reversion restrictions or increase the risk of fire hazards.

Policy OSC-3.5 - Require property owners to replace removed native trees in a manner that maintains the visual character of the property and takes neighboring properties into consideration. The replacement trees may be located on other parts of the lot, as approved by the Town.

Policy OSC-3.9 - Preserve dedicated open space areas and evaluate recreational potential of open space.

Goal OSC-4 - Minimize the impact of urban development on creeks and maintain a high level of water quality.

Policy OSC-4.1 - Control and monitor development and activities along the creeks to avoid negative impacts from urban uses on water quality and habitat preservation and enhancement, as well as to protect the public health and safety of public and private property.

Policy OSC-4.2 - Encourage development to follow watershed-based planning and zoning by examining proposed development in the context of the entire watershed and subwatershed.

Policy OSC-4.4 - Require projects to reduce, to the extent feasible, potential sediment discharge, erosion, run-off flow and volume, and stormwater pollution, both during construction, as well as post-construction. Require projects to incorporate mitigation measures, such as Best Management Practices (BMPs), to address these water quality impacts, especially if proposing construction during the wet season.

Policy OSC-4.7 - Require property owners to work with the natural topography and drainages to the extent feasible when designing development projects to reduce the amount of grading necessary and limit the disturbances to natural water bodies and drainage systems.

Action OSC-4.1 - The Town will adopt and implement a Creek Protection Ordinance to ensure that new development does not have a negative impact upon the hydrology and riparian habitat of existing creeks and streams as well as to protect the health of the watersheds, consistent with the goals and policies contained in this Element.

Action OSC-4.2 - As co-permittee, the Town will continue to participate in the San Mateo Countywide Water Pollution Prevention Program (SMCWPPP) or equal program. New development and Town activities will be reviewed for compliance with SMCWPPP as part of project approval. The Town will also monitor construction to ensure compliance with any required mitigation.

Action OSC-4.3 - The Town will encourage property owners to incorporate water conservation techniques into their landscaping to reduce water usage.

Goal N-1 - Minimize noise levels within neighborhoods so that residents may enjoy the benefits normally associated with residential communities.

Policy N-1.1 - Encourage new development in noise impacted areas to provide effective noise insulation measures.

Policy N-1.2 - Eliminate excessive noise within the community to the extent feasible. When noise cannot be eliminated completely, regulate noise generation to minimize impacts.

Policy N-1.3 - Continue to enforce local and State noise regulations to minimize noise impacts associated with construction and public and private activities.

Goal N-2 - Continue to monitor airport operations and influence airport policy to minimize the impact of airport-generated noise on Hillsborough.

Policy N-2.2 - Continue to participate in regional airport planning efforts.

Action N-2.1 - The Town will continue to participate on the Airport/Community Roundtable and coordinate with the SFO Airport Land Use Commission and SFO's Aircraft Noise Abatement Office. All noise issues affecting the Town should be monitored and the City Council should be briefed on all issues so that required actions can be implemented.

Action N-2.2 - The Town will cooperate with the Comprehensive Airport Land Use Plans' requirements for review of proposed land use policy actions and real estate notification for property located within an influence area for the San Francisco International Airport or the San Carlos Airport.

Goal H-1 - Increased housing opportunities in Hillsborough and surrounding communities.

Policy H-1-A - Actively participate in meeting the housing needs of the community.

Program 1-A1 - Appoint one Councilmember to work on subregional housing efforts.

Program 1-A2 - Work with nearby communities to explore subregional housing needs and solutions.

Program 1-A3 - Work with local institutions under Chapter 17.16 of the Zoning Ordinance to consider developing employee housing on existing institutional lands in Hillsborough.

Program 1-A4 - Work with local and nearby districts (including but not limited to the San Mateo County Community College District) to promote and support the development of affordable housing for faculty, staff, and others on existing institutional lands.

Program 1-A5 - Evaluate and report annually to the City Council on progress in developing cooperative solutions to regional housing problems.

Program 1-A6 - Continue Town contributions to San Mateo County homeless and transitional housing programs. Enhance regional and subregional housing efforts by exploring partnerships through existing programs.

Policy 1-B - Facilitate the private development of housing in Hillsborough.

Program 1-B1 - Process design review applications and building permits promptly.

Policy 1-C - Continue to improve the land use entitlement process.

Policy 1-D - Use vacant land on the periphery of Hillsborough to increase housing opportunities.

Program 1-D1 - Consider annexations of land adjacent to Hillsborough that permit housing opportunities.

Goal H-2 - Housing consistent with the character of the community.

Policy H-2-A - Allow subdivision of existing vacant lots larger than one acre.

Program H-2-A1 - Continue to permit subdivision of vacant parcels that are large enough to accommodate two or more half-acre lots, but which cannot meet street frontage or lot width requirements.

Policy 2-B - Promote more housing options while preserving the character of Hillsborough.

Program 2-B1 - Continue to use the density bonus, as provided by Chapter 17.60 of the Hillsborough Municipal Code, to encourage affordable or senior housing or both, as well as affordable housing for families of five or more persons.

Goal 3 - A continuum of housing opportunities for the members of the Hillsborough community in all stages of life with or without disabilities.

Policy 3-A - Support seniors and other special needs populations.

Program 3-A1 - As required by State law, continue to allow board and care facilities for six or fewer residents.

Program 3-A2 - Continue to ensure that transitional and supportive housing is allowed as specified in State law.

Program 3-A3 - Inform local developers of opportunities to provide transitional and supportive housing.

Program 3-A4 - Continue to allow an emergency shelter at the Town's Civic Center within the former fire station as a permitted use, subject to standards, as required by State law.

Program 3-A5 - Develop a plan to better meet the needs of seniors.

Policy 3-B - Continue to permit the renting of rooms in Hillsborough homes to provide additional housing opportunities for single people.

Program 3-B1 - Continue to allow the renting of individual rooms in Hillsborough houses.

Program 3-B2 - Continue to support and promote the shared housing concept.

Policy 3-C - Encourage both attached and detached second units where currently permitted.

Program 3-C1 - Continue to waive planning and building permit fees for second units.

Program 3-C2 - Continue to promote and inform the public about the provisions of Chapter 17.52 of the Zoning Ordinance which allow "second units" to be (1) created within existing homes; (2) created by converting existing detached accessory buildings (freestanding cabanas or pool houses); (3) developed as new detached accessory buildings to existing homes; or (4) developed as part of newly constructed single-family residences—either as detached units or incorporated within the main house.

Program 3-C3 - Continue to approve second units through an administrative process and ascertain intent for use of the second unit and level of affordability.

Program 3-C4 - Continue implementing the provisions in §17.52.040 to convert existing, appropriate residential space to second units when upgraded to code.

Program 3C-5 - Implement additional measures to encourage second units.

Program 3C-6 - Allow rental of second units.

Goal 4 - Equal housing opportunities for all.

Program 4-A1 - Continue to designate the City Attorney as the appropriate City official to receive and forward housing discrimination complaints for investigation and action.

Program 4-A2 - Continue to implement Chapter 17.42 of the Zoning Ordinance (Reasonable Accommodation) to expedite retrofit efforts to comply with the Americans with Disabilities Act

(ADA), require ADA compliance in all new development that is subject to ADA, and provide flexibility in the development of housing for persons with disabilities.

Program 4-A3 - Reach out to local service providers of special needs groups to assist in the identification and analysis of constraint to the provision of housing for persons with disabilities.

Hillsborough Municipal Code

The Zoning Ordinance and Subdivision Ordinance of the Hillsborough Municipal Code regulate land use in the Town. Hillsborough's Zoning Ordinance is contained in Title 17 of the Municipal Code. The Zoning Ordinance is the mechanism used to implement the goals, objectives, and policies of the General Plan and to regulate all land use within the Town. The Subdivision Ordinance, contained in Title 16 of the Municipal Code, implements the Subdivision Map Act of the State of California by regulating the design and improvement of subdivisions in Hillsborough.

4.10.3 Thresholds of Significance

Potential impacts related to land use were determined in accordance with Appendix G of the CEQA Guidelines. Impacts would be considered potentially significant if the proposed Project will:

A. Physically divide an established community; or

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.

4.10.4 Impacts and Mitigation Measures

The following analysis is provided at a programmatic level consistent with the level of detail of the proposed Project. This discussion focuses on the proposed Project's conformity with adopted plans and policies.

Please note that planning documents that pertain to specific technical topics (e.g., Noise) are discussed in those topical sections of this Draft EIR.

Impact LAND-1 – Project Potential for Physically Dividing an Established Community. *[Threshold of Significance (a)]*

The physical division of an established community typically refers to the construction of a physical feature (such as a new freeway, railway, or other large transportation projects, or land development conducted in a manner that would substantially alter existing movement patterns) or the removal of a means of access (such as a bridge) that would impede or restrict movements within a community. It also may refer to policies that limit or preclude access between adjacent areas or neighborhoods within a town or city. The Project does not propose major circulation changes or changes in land development that would restrict access to any areas of the Town.

Implementation of the Project would result in the construction of additional residential units on a variety of Housing Opportunity Sites (undeveloped single lots, undeveloped large lots, and sites with existing public infrastructure such as the Town Hall site, the Burlingame Country Club, and

the Nueva School site) but no major infrastructure or circulation changes are proposed as part of this Project. The Tobin Clark site conceptual plans call for access to the site to be through the College of San Mateo so any new roads providing access to the Tobin Clark site would not divide the Town of Hillsborough. Even if access to the Tobin Clark site would have to be provided by a new road(s), the local road would not divide the community.

Residential housing construction facilitated by the proposed Project would not physically divide an established community, and this impact would be ***less than significant***.

Impact LAND-2 – Project Consistency with Land Use Plans, Policies, and Regulations Adopted for the Purpose of Avoiding or Mitigating Environmental Effects. *[Threshold of Significance (b)]*

This section includes a discussion of potential conflicts between the Project and applicable planning documents. It should be noted that policy conflicts do not, in and of themselves, constitute a significant environmental impact. However, policy inconsistency is considered to be a significant adverse environmental impact when it is related to a policy adopted for the purpose of avoiding or mitigating an environmental effect and it is anticipated that the inconsistency would result in a significant adverse physical impact. Please note that planning documents that pertain to specific technical topics (e.g., Air Quality) are discussed in those topical sections of this Draft EIR.

General Plan Updates

The Draft 2023 – 2031 Housing Element would be adopted as part of the General Plan. The updated element would comply with State Planning Law requirements for this General Plan element, and the proposed housing opportunity sites identified within the Draft 2023 – 2031 Housing Element would allow the Town to meet its RHNA allocation as identified by ABAG.

The Project also includes updates to the General Plan Land Use, Open Space and Conservation, and Public Safety Elements for internal consistency with the Draft 2023 – 2031 Housing Element. The Project does not propose a comprehensive update to the General Plan Public Safety Element. The Town is planning a separate comprehensive update of the Public Safety Element in the future as required by SB 1035 (2018).

<u>Housing Element Updates</u>

The key goals, policies, and actions of the updated Housing Element are identified below.

- Policy 1: Reduce Barriers to Housing Development
  - Goal 1.1: Allow for increased subdivision opportunities throughout the community.
    - Action 1.1 (a): Continue to implement Senate Bill 9 (SB9), as appropriate. SB 9 allows all properties within a “single-family residential zone” to be subdivided into two parcels and developed with two primary dwelling units per lot, irrespective of local standards.
  - Goal 1.2: Streamline the project review process for housing-related applications.
    - Action 1.2 (d): Utilize CEQA exemptions for infill development sites, such as the Nueva private school site, to shorten entitlement review time.

  - Goal 1.3: Assist Town residents in the resolution of land use conflicts to promote successful housing development projects.
  - Goal 1.4: Amend the Town's zoning regulations to comply with all recently adopted state legislation.
  - Goal 1.5: Amend the Town's zoning regulations to accommodate a variety of housing types.
    - Action 1.5 (a): Eliminate the minimum required residential structure size.
  - Goal 1.6: Establish an Affordable Housing Impact Fee program and associated Housing Choice Fund.
  - Goal 1.7: Build support for the development of new housing in Hillsborough.
- Policy 2: Promote the Construction and Affordability of Accessory Dwelling Units (ADUs).
  - Goal 2.1: Continue to support and fund the Town ADU Ombudsperson to guide property owners through the Town's ADU development process.
    - Action 2.1 (d): Increase Accessory Dwelling Unit production by encouraging homeowners and developers to include attached or detached Accessory Dwelling Units in existing or new homes.
  - Goal 2.2: Further streamline and expedite the ADU and JADU permitting process.
    - Action 2.2 (c): Incentivize ADUs and JADUs to be constructed along with new single-family detached housing by allowing concurrent permit review and approval and no-cost deed recording with Town notary.
    - Action 2.2 (d): Continue ADU Exception process to allow exceptions for specified zoning standards, such as maximum lot coverage and minimum landscape coverage, to accommodate ADUs and JADUs that do not comply with every applicable standard in Section 17.52.020.
    - Action 2.2 (e): In coordination with the Central County Fire Department and CalFire establish pre-approved fire parameters for ADUs to streamline fire related review.
  - Goal 2.3: Adopt an ordinance to allow up to two detached ADUs on lots two acres and larger.
    - Action 2.3 (c): Present to City Council for consideration and adoption, language allowing a maximum of two detached ADUs on lots two acres and larger.
  - Goal 2.4: Create a program to encourage and expedite the conversion of pool houses, guest houses, and other accessory structures to recorded ADUs/JADUs.
    - Action 2.4 (c): Present to City Council for consideration and adoption, language amending chapter 17.52 (Accessory Dwelling Units) of the Hillsborough Municipal Code expediting the conversion of pool house, guest house, and similar accessory structures into recorded ADUs.
  - Goal 2.5: Require all future pool house, guest house, and similar development to be constructed to the standards of an ADU to accommodate future conversion.
    - Action 2.5 (c): Present to City Council for consideration and adoption, language amending chapter 17.52 (Accessory Dwelling Units) of the Hillsborough Municipal Code to requiring pool house, guest house, and similar accessory structures to be constructed for use as and recorded as an ADU.
  - Goal 2.6: Create a retroactive permitting program for existing, unpermitted ADUs and JADUs.
    - Action 2.6 (a): Establish an ADU/JADU Amnesty Program to allow eligible properties to legalize existing ADUs that were constructed without a permit.

  - Goal 2.7: Via 21 Elements, coordinate with San Mateo County jurisdictions on facilitating ADU Development.
  - Goal 2.8: Conduct an ADU education and outreach campaign.
  - Goal 2.9: Monitor ADU production and utilization and trigger mid-cycle adjustments as needed.
- Policy 3: Facilitate Housing Development on Public, Commercial, Nonprofit, and Institutionally Owned Sites
  - Goal 3.1: Monitor the disposition of all publicly owned land for potential future use for housing development.
  - Goal 3.2: Encourage and support the use of private recreational and private school land for housing development to accommodate housing choice throughout Hillsborough.
    - Action 3.2 (a): Provide staff support and community engagement facilitation to support development of multi-family housing units at the identified housing opportunity sites; Nueva private school and the Burlingame Country Club.
  - Goal 3.3: Facilitate the development of housing at the Town Hall Campus.
    - Action 3.3 (a): Refine the recently completed study of the Town Hall Campus site to reflect the 16 units of housing proposed in this Housing Element.
    - Action 3.3 (b): Conduct extensive public outreach to develop a community driven vision for the Town Hall Campus, including the 16 units of housing proposed in this Housing Element.
    - Action 3.3 (c): Using the findings of the refined study referenced in Action 3.3 (a) and community driven visioning process referenced in Action 3.3 (b), develop a comprehensive Town Hall Campus Redevelopment Program to ensure redevelopment of the site via a public-private partnership during the RHNA 6 Cycle. The comprehensive program will include an overview of team structure, available revenues and gaps, approvals required, phasing strategy, and partnership plan.
    - Action 3.3 (d): Amend the zoning for the Town Hall Campus to permit development of housing ‘by right’ within the time limits required by State law.
    - Action 3.3 (g): Complete design review of the proposed development and approve a development and disposition agreement with the proposed developer, including any proposed City assistance. If the property is not exempt surplus property, provide the development and disposition agreement to HCD prior to approval. Ensure that a covenant is recorded as required by the Surplus Lands Act.
  - Goal 3.4: Facilitate the development of housing at the Tobin Clark housing opportunity site.
    - Action 3.4 (d): Amend the zoning for the Tobin Clark property to permit development of housing ‘by right’ within the time limits required by State law.
    - Action 3.4 (g): Complete design review of the proposed development and approve a development and disposition agreement with the proposed developer, including any proposed City assistance. If the property is not exempt surplus property, provide the development and disposition agreement to HCD prior to approval. Ensure that a covenant is recorded as required by the Surplus Lands Act.
- Policy 4: Ensure Responsible Development in Wildland Urban Interface (WUI) Areas.

    - Goal 4.1: Continue to support the Central County Fire District (CCFD) WUI Home Inspection Program.
    - Goal 4.2: Continue to support community participation in the National Firewise USA® Recognition Program of the NFPA.
    - Goal 4.3: Establish and enforce safety standards for structures and landscaping in WUI areas.
- Policy 5: Establish and Strengthen Opportunities for Rental Tenancies in ADUs and throughout Hillsborough.
    - Goal 5.1: Add a Tenant/Landlord information page to the Town website.
    - Goal 5.2: Support the Human Investment Project (HIP Housing) Home Sharing, Self-Sufficiency, and Property programs.
    - Goal 5.3: Establish and continue partnerships with local nonprofits for tenant outreach and counseling.
    - Goal 5.4: Adopt an anti-harassment ordinance and a right-to-counsel policy.
- Policy 6: Actively Participate in Addressing the Housing Needs of the Region.
    - Goal 6.1: Continue participation in and support for the 21 Elements project.
    - Goal 6.2: Provide financial support to local housing, homelessness, and mental health support programs.
    - Goal 6.3: Report annually to City Council on the Town's progress in meeting the RHNA Cycle 6 housing allocation.
    - Goal 6.4: Monitor the opportunity sites inventory and the Town's progress in meeting RHNA.
- Policy 7: Affirmatively Further Fair Housing Opportunities.
    - Goal 7.1: Eliminate discrimination in housing based on age, race, color, religion, sex, marital status, national origin, ancestry, or occupation.
    - Goal 7.2: Proactively increase access to affordable housing options for historically marginalized and underrepresented groups.
    - Goal 7.3: Conduct an AFFH Education and Outreach Campaign.

Land Use Element Updates

The Land Use Element would be updated to ensure consistency with the Draft 2023 – 2031 Housing Element. This includes updating the General Plan land use designations to describe the new mixed residential and governmental and residential mixed land use designations allowing multi-family residential uses. The text below shows how the Town proposes to modify the General Plan land use designations. Underlined text indicates new text being added and ~~strikeout~~ text indicates text that is being deleted or modified.

1. Traditional Residential (R-1)

The Traditional Residential designation allows for the development of single-family dwellings in a manner that is consistent with the existing character of the community. Additional uses that may be allowed include home businesses, ~~second~~ accessory dwelling units, family day care homes and other compatible uses identified in the Hillsborough Municipal Code. The maximum allowed density is one primary single-family dwelling per ½ acre, exclusive of accessory dwelling units.

2. Mixed Residential (R-2)

The Mixed Residential designation allows for the development of townhomes and multifamily buildings on Town owned land. Additional uses that may be allowed include home businesses, family day care homes, and other compatible uses identified in the Hillsborough Municipal Code. The minimum allowed density is 20 units per acre. Development is approved ministerially and compliance with objective design and development standards is required. For subdivisions resulting in five or more units, a conceptual plan shall be prepared.

3. Governmental and Residential Mixed Use

The Governmental and Residential Mixed-Use designation allows for the development of Town of Hillsborough facilities as well as limited residential units on Town owned land. A maximum of 16 dwelling units may be accommodated on the land included in this designation. Development is approved ministerially and compliance with objective design and development standards is required. For subdivisions resulting in five or more units, a conceptual plan shall be prepared.

~~2~~4. Public Facilities and Services

The Public Facilities and Services designation allows for the development and operation of services and facilities that are necessary to meet the community's needs, while maintaining the character of the community. Allowable uses include public schools, governmental facilities, parks and other recreational facilities. The maximum allowed intensity for the existing land currently designated Public Facilities and Services designation is 15 percent above the floor area ratio intensity in existence as of adoption of this General Plan. This allowed increase acknowledges that there may be the need for changes to existing public facilities in the future in order to maintain the high level of public service that Hillsborough residents expect. However, prior to approving an increase in the intensity of development, a study will be completed by the Town to ensure that the increase is kept to the minimum necessary to allow for the continued provision of service. The public will be involved in the planning process to ensure that expansion and change occurs in a manner that is compatible with the character of the Town, while allowing for the continued operation and provision of public services.

Additionally, the General Plan Land Use Map will also be updated to reflect the changes in zoning required to support the Housing Element and the Zoning map will be amended. The new General Plan Land Use Map and zoning designations are presented in Figure 3.3-8 and Figure 3.3-9 in Chapter 3 Project Description.

Open Space and Conservation Element Updates

The Open Space and Conservation Element would be updated to ensure consistency with the Draft 2023-2031 Housing Element, and includes updates of data and figures as necessary to reflect newer information; revisions to references to Natural Space Resources, including removal of the Tobin Clark site as Open Space & Conservation ; updates as necessary to Table OSC-1 ("Biological Resources With the Potential to Occur in Hillsborough (2004)"); updates to tree removal discussion with consideration whether encouraging removal of specific tree

species should remain; and updates as necessary pertaining to water quality to reflect SFPUC's 2003 Water Quality Report.

In addition, the update includes new action items to implement mitigation measures identified in the Biological Resources chapter of this EIR (Mitigation Measure BIO-1. Project-Specific Biological Resources Evaluation; Mitigation Measure BIO-2. Nesting Birds; Mitigation Measure BIO-3a. Bat Habitat Assessment; Mitigation Measure BIO-3b. Dusk Emergence Bat Survey; and Mitigation Measure BIO-4 – Stream Protection Ordinance).

Public Safety Element Updates

The Public Safety Element is updated to ensure consistency with the Draft 2023-2031 Housing Element, and includes updates to background information to reflect current risks due to natural and man-made hazards (such as wildland and urban fires and emergency preparedness) and updates as necessary to relevant Goals, Policies and Actions; updates, if necessary, to Figure PS-1: Wildland Fire Hazards (2003); updates to discussion on vegetation management to reflect current and future practices and requirements; updates, as necessary, to identified underground storage tanks (UST) within the community used for fuel storage, as well as several above-ground storage tanks; updates, as necessary to San Mateo County Operational Area Emergency Operations Plan (EOC) and the Standardized Emergency Management System (SEMS); and an accuracy check of Government Code references and revisions as necessary.

In addition, the update includes actions items revising Action PS-2.1 and other references to the Town's Hillside Lot Size Ordinance that limits development on slopes over 10 percent; and action items to implement mitigation measures identified in the Geology and Soils chapter of this EIR (Mitigation Measure GEO-1), Hazards and Hazardous Materials chapter (Mitigation Measure HAZ-1 regarding New Public Safety Policy PS-5.5 and new Public Safety Action PS-5.5), Hydrology and Water Quality chapter (Mitigation Measure HYD-1), and Wildfire chapter (Mitigation Measure WILD-1).

As stated previously, the Project does not include a comprehensive update to the General Plan Public Safety Element. The Town is planning a separate comprehensive update of the Public Safety Element in the future as required by SB 1035 (2018).

Analysis

The Project proposes the redesignation and rezoning of three parcels in the Planning Area to facilitate the potential development of three of the Housing Opportunity Sites.

The Town Hall Complex Opportunity Site is currently designated Public Service and Facilities, a land use designation intended for the "development and operation of services and facilities that are necessary to meet the community's needs, while maintaining the character of the community." The Project would redesignate the Town Hall Complex Opportunity Site from "Public Facilities and Services", which does not currently allow for residential land uses, to "Governmental and Residential Mixed Use", which allows for residential land uses. This proposed redesignation would not result in a significant land use impact because the change in land use would not preclude the existing uses (Town Hall and Police Station) but would be adding the ability for the Town to add residential uses to the site. There are no land use impacts associated with this proposed rezoning.

The Tobin Clark Opportunity Site currently has a General Plan land use designation of Open Space & Conservation. The current General Plan contains specific policies intended to preserve open space areas, as listed below:

Policy OSC-2.1 - Continue to maintain Town-owned open space in a manner that balances the need to protect natural habitat with controlling vegetation to reduce fuel loads, arrangements, and potential wildfire hazards.

Policy OSC-2.2 - Consider the limited public use of Town-owned public open space, where appropriate, in a manner that considers mitigation of impacts on adjacent neighbors and natural resources and does not conflict with existing reversion restrictions or increase the risk of fire hazards.

Policy OSC-3.9 - Preserve dedicated open space areas and evaluate recreational potential of open space.

The Open Space & Conservation land use designation was established to, "preserve environmentally sensitive areas and maintain a high quality of light, air, and scenic beauty in the community," and does not allow for the development of housing. As such, the rezoning and redesignation of the Tobin Clark site from open space to residential land use would be inconsistent with the General Plan Open Space & Conservation Land Use Element policies listed above. However, the Open Space & Conservation land use designation was not specifically given to this parcel to avoid or mitigate environmental effects (see Threshold of Significance (b), above). Therefore, the redesignation and rezoning of the Tobin Clark Opportunity Site to residential use would not be a significant land use impact as this action would not conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating environmental effects. The redesignation and rezoning of this parcel to a residential land use would not cause a land use impact such as from environmental hazards associated with the parcels or surrounding areas, expose new residents to hazardous conditions, or divide or disrupt the community.

Conclusion

Future housing projects facilitated by the proposed Project would be reviewed for adherence to the General Plan and applicable zoning regulations. The General Plan contains many policies, some of which may compete with each other. The City Council, in deciding whether to approve a proposed development project, would decide whether, on balance, a project is consistent with the General Plan. For the reasons listed above, the Project would not conflict with General Plan policies adopted for the purpose of avoiding or mitigating environmental effects, and this impact would be ***less than significant***.

Municipal Code Amendments

Amendments to the Town's Municipal Code, including the Zoning Ordinance (Title 17 of the Hillsborough Municipal Code), would be initiated to allow for fulfilment of the City's RHNA by amending existing zoning designations, creating new zoning designations, and modifying existing development standards. The proposed Zoning Ordinance amendments are anticipated to include single-family residential (e.g., in response to SB 9) and multi-family residential and mixed-use categories. The existing Residential Zoning District would be renamed to the Traditional Residential Zoning District (RD-1). New zoning designations would include the Mixed

Residential (RD-2) and Governmental and Residential Mixed Use (RD-3) Districts. The RD-1 District would continue to preserve and protect Hillsborough's existing, single family detached neighborhoods. The RD-2 District would accommodate the development of townhomes and multifamily buildings on Town-owned land. The RD-3 District would accommodate the development of Town of Hillsborough facilities as well as limited residential units on Town-owned land. The RD-2 District is proposed specifically for and would encompass only the Tobin Clark Housing Opportunity Site in the southern portion of the Planning Area. The RD-3 District is proposed specifically for and would encompass only the Town Hall Campus Housing Opportunity Site in the El Camino Real corridor.

In addition to the proposed density increases, the Town proposes to revise development standards for residential and mixed-use zoning districts such as setbacks, FAR, parking, landscaping, private open space, and other development-related requirements to reflect recent changes in State law and to better reflect current development practices and the new density changes. The Town's General Plan Land Use and Zoning Maps will also be updated to reflect these changes (see Figure 3.3-8 and Figure 3.3-9 in Chapter 3 Project Description).

As discussed above, the Land Use Element would be updated to ensure consistency with the Housing Element. These updates would ensure consistency between the General Plan and Title 17 (Zoning) as required by State law. The Traditional Residential Land Use designation would encompass most of the parcels in the Planning Area. The new Mixed Residential Land Use designation is proposed to encompass only the Tobin Clark Opportunity Site. The Governmental and Residential Mixed Use General Plan Land Use designation is proposed to encompass only the Town Hall Campus Opportunity Site. Zoning districts would be updated to correspond to the new General Plan land use designations.

These proposed amendments reflect the Town's planning for additional single units (e.g., anticipated units from SB9 and ADUs), and additional multi-unit housing types in the mixed residential zones. New and amended zoning districts would include Traditional Residential (RD-1), Mixed Residential (RD-2), and Governmental and Residential Mixed Use (RD-3) districts, as described above. The RD-1 District would continue to allow up to one single-family dwelling unit per ½ acre, exclusive of ADUs. The RD-2 District would have a minimum allowed density of 20 units per acre. The RD-3 District would allow up to 16 dwelling units on land with this zoning district designation.

The Project also proposes Municipal Code amendments outside Title 17. The Project includes revisions to Title 16 (Subdivisions) of the Municipal Code to facilitate the subdivision and development of additional housing, which would likely require modifying existing subdivision standards pertaining to average slope and minimum lot size.

The Project includes actions with amendments to the Municipal Code to be enacted after adoption of the Focused GPU; however, this EIR contemplates these actions as implementing programs and activities of the Project. The purpose of the amendments is to make Title 17 consistent with the goals, policies, and actions of the Project. Amendments to Title 17 necessary to implement these actions will be adopted to implement the Draft 2023-2031 Housing Element, and as necessary to meet the RHNA. The Project would therefore not result in a significant environmental impact due to a conflict with the zoning ordinance.

Future development of housing inventory sites with new or redeveloped dwelling units would be required to be consistent with the amended General Plan land use designations and zoning

districts, as well as applicable development standards. Where adverse physical effects on the environment could result from the future development of housing on the potential housing sites, those potential impacts are addressed in the appropriate environmental sections of this EIR. Additionally, potential conflicts with planning documents pertaining to specific environmental topics, such as Noise, are identified within those applicable sections of the EIR.

Plan Bay Area 2050

The Project would be consistent with the growth projections included in the *Plan Bay Area 2050.* Throughout *Plan Bay Area 2050,* Growth Geographies are geographic areas used to guide where future growth in housing and jobs would be focused under the plan's strategies over the next 30 years. These geographies are identified for growth either by local jurisdictions or because of their proximity to transit or access to opportunity. ABAG and MTC have provided an interactive online GIS map of the nine-county Bay Area that allows users to zoom in to specific localities. There are *Plan Bay Area 2050* High Resource Areas and Transit-Rich Areas *G*rowth Geographies located within the Town of Hillsborough along a portion of El Camino Real (ABAG/MTC 2023). Additionally, there are Priority Development Areas and additional High Resource Areas and Transit-Rich Areas located in the immediate proximity of the Planning Area along the El Camino Real Corridor. As the Growth Geographies are meant to encourage the development of housing in proximity to existing and future employment centers and/or public transit, housing developed within and in proximity to a Growth Geography would contribute to meeting this objective. The Project proposes the construction of multi-family housing at the Town Hall Complex Opportunity Site, which is located in a High Resource Area and Transit-Rich Area.

The proposed housing sites would further new housing development in Town in compliance with its RHNA, which would advance residential growth promoted in *Plan Bay Area 2050.* The Project has been developed to show the Town can accommodate 605 housing units, which is 51 housing units beyond its RHNA of 554 housing units. The Project is consistent with the Town's RHNA assignment.

The Town's historical land use development patterns, as detailed in Chapter 4.4 Cultural Resources and Tribal Cultural Resources, facilitated the construction of an almost entirely single-family residential community that is very low-density. The Town's existing General Plan policies and zoning regulations reflect these historical land use development patterns, prioritizing the preservation of single-family residential uses. While the Hillsborough General Plan and Draft 2023-2031 Housing Element may not fully reflect Plan Bay Area 2050 strategies to construct a greater mix of housing densities and types in Growth Geographic, for example, the Draft 2023-2031 Housing Element is responsive to Plan Bay Area 2050's intent to increase the housing stock in the region. The Town is proposing to create new General Plan land use designations and zoning districts to facilitate denser development (multi-family housing) and to increase affordable housing opportunities in the Town. Within the context of the Town's historical land use patterns and the Town's existing General Plan and Housing Element documents, the Draft 2023-2031 Housing Element is responsive to the Town's RHNA assignment and *Plan Bay Area 2050*'s strategies to develop denser housing opportunities predominantly along major transportation corridors.

Plan Bay Area 2050 was created, in part, to ensure the future reduction of GHG emissions from the transportation sector in the Bay Area. *Plan Bay Area 2050* aims to reduce 2035 per capita

GHG emissions from cars and light-duty trucks by 20 percent compared to a 2005 baseline. As discussed in Chapter 4.7 Greenhouse Gases of this EIR, the Project's projected VMT per capita would be substantially higher than the VMT per capita threshold for San Mateo County, and the Project would increase cumulative total VMT in the County. As such, the Project would not result in a reduction of VMT per resident and implementation of the Project could impede the Town and County's ability to meet regional transportation GHG reduction goals established by *Plan Bay Area 2050*. Mitigation Measures GHG-1a through GHG-1e are included in Chapter 4.7 to reduce the GHG emissions associated with future housing development that may be facilitated by the Project. However, as concluded in Chapter 4.7, the GHG reductions that can be attributed to future implementation of Mitigation Measures GHG-1a through GHG-1e cannot be definitively assessed at this time, and the Project's conflict with *Plan Bay Area 2050*'s GHG emissions reduction goals would remain a significant and unavoidable GHG impact. However, the Project's conflict with *Plan Bay Area 2050*'s GHG reduction goals does not constitute a potentially significant land use impact as the Draft 2023 – 2031 Housing Element implements the housing strategies reflected in *Plan Bay Area 2050* and, from a land use perspective, is therefore consistent with Plan Bay Area 2050 policies.

Summary

The proposed Project is intended to update the Town's Housing Element according to State law, and to update other portions of the General Plan for internal consistency. The Municipal Code will be updated to reflect the new General Plan Land Use designations and Housing Element polices. The Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. This impact would be ***less than significant***.

4.10.5 References

Association of Bay Area Governments and Metropolitan Transportation Commission (ABAG/MTC). 2023. Plan Bay Area 2050 Growth Geographies. Accessed August 15, 2023 at https://opendata.mtc.ca.gov/datasets/d74d81cfce2a4bc9851858f087b78f49/explore?location=38.002291,-121.766977,15.00.

Association of Bay Area Governments and the Metropolitan Transportation Commission (ABAG/MTC). 2021. Plan Bay Area 2050. May 26, 2021. https://www.planbayarea.org/plan-bay-area-2050

Town of Hillsborough. 2005. Hillsborough General Plan. March 14, 2005.

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4.11 Noise

This chapter provides pertinent background information on the nature of environmental sound and vibration transmission; describes the existing environmental and regulatory noise and vibration setting of the Planning Area, and evaluates the proposed Project's potential noise and vibration impacts that could result from implementation of the Draft 2023 – 2031 Housing Element. Refer to Appendix E for detailed technical noise data that is otherwise summarized in this chapter.

4.11.1 Fundamentals of Environmental Acoustics

Noise is generally defined as unwanted sound and is widely recognized as a form of environmental degradation. Airborne sound is the rapid fluctuation of air pressure above and below atmospheric pressure. The frequency (pitch), amplitude (intensity or loudness), and duration of a sound all contribute to the effect on a listener, or receptor, and whether or not the receptor perceives the sound as "noisy" or annoying.

Pitch is the height or depth of a tone or sound and depends on the frequency of the vibrations by which it is produced. Sound frequency is expressed in terms of cycles per second, or Hertz (Hz). Humans generally hear sounds with frequencies between 20 and 20,000 Hz and perceive higher frequency sounds, or high pitch noise, as louder than low-frequency sound or sounds low in pitch. Sound intensity or loudness is a function of the amplitude of the pressure wave generated by a noise source combined with the reception characteristics of the human ear. Atmospheric factors and obstructions between the noise source and receptor also affect the loudness perceived by the receptor.

Sound pressure levels are typically expressed on a logarithmic scale in terms of decibels (dB). A dB is a unit of measurement that indicates the relative amplitude (i.e., intensity or loudness) of a sound, with 0 dB corresponding roughly to the threshold of hearing for the healthy, unimpaired human ear. An increase of 10 dBs represents a ten-fold increase in acoustic energy, while 20 dBs is 100 times more intense, 30 dBs is 1,000 times more intense, and so on. In general, there is a relationship between the subjective noisiness or loudness of a sound and its intensity, with each 10 dB increase in sound level perceived as approximately a doubling of loudness. Due to the logarithmic basis, decibels cannot be directly added or subtracted together using common arithmetic operations:

$$50 \text{ decibels} + 50 \text{ decibels} \neq 100 \text{ decibels}$$

Instead, the combined sound level from two or more sources must be combined logarithmically. For example, if one noise source produces a sound power level of 50 dBA, two of the same sources would combine to produce 53 dB as shown below.

$$10 \times 10 \log(10^{((50/10))} + 10^{((50/10))}) = 53 \text{ decibels}$$

In general, when one source is 10 dB higher than another source, the quieter source does not add to the sound levels produced by the louder source because the louder source contains ten times more sound energy than the quieter source.

Sound Characterization

Although humans generally can hear sounds with frequencies between 20 and 20,000 Hz, most of the sounds humans are normally exposed to do not consist of a single frequency, but rather a broad range of frequencies perceived differently by the human ear. In general, humans are most sensitive to the frequency range of 1,000–8,000 Hz and perceive sounds within that range better than sounds of the same amplitude in higher or lower frequencies. Instruments used to measure sound, therefore, include an electrical filter that enables the instrument's detectors to replicate human hearing. This filter, known as the "A-weighting" or "A-weighted sound level," filters low and very high frequencies, giving greater weight to the frequencies of sound to which the human ear is typically most sensitive. Most environmental measurements are reported in dBA, meaning decibels on the A-scale. See Table 4.11-1 for a list common noise sources and their A-weighted noise levels.

Sound levels are usually not steady but vary over time. Therefore, a method for describing either the average character of the sound or the statistical behavior of the variations over a period of time is necessary. The continuous equivalent noise level (L_{eq}) descriptor is used to represent the average character of the sound over a period of time. The L_{eq} represents the level of steady-state noise that would have the same acoustical energy as the time-varying noise measured over a given time period. L_{eq} is useful for evaluating shorter time periods over the course of a day. The most common L_{eq} averaging period is hourly, but L_{eq} can describe any series of noise events over a given period.

Variable noise levels are the values that are exceeded for a portion of the measured period. Thus, the L_{01}, L_{10}, L_{50}, and L_{90} descriptors represent the sound levels exceeded 1 percent 10 percent, 50 percent, and 90 percent of the time the measurement was performed. The L_{90} value usually corresponds to the background sound level at the measurement location.

When considering environmental noise, it is important to account for the different responses people have to daytime and nighttime noise. In general, during the nighttime, background noise levels are generally quieter than during the daytime but also more noticeable due to the fact that household noise has decreased as people begin to retire and sleep. Noise exposure over the course of an entire day is described by the day/night average sound level, DNL (or L_{dn}), and the community noise equivalent level, or CNEL, descriptors. Both descriptors represent the 24-hour noise exposure in a community or area. For DNL, the 24-hour day is divided into a 15-hour daytime period (7:00 AM to 10:00 PM) and a 9-hour nighttime period (10:00 PM to 7:00 AM), and a 10 dB "penalty" is added to measured nighttime noise levels when calculating the 24-hour average noise level. For example, a 45 dBA nighttime sound level would contribute as much to the overall day-night average as a 55 dBA daytime sound level. The CNEL descriptor is similar to DNL, except that it includes an additional 5 dBA penalty for noise events that occur during the evening time period (7:00 PM to 10:00 PM). The artificial penalties imposed during DNL and CNEL calculations are intended to account for a receptor's increased sensitivity to noise levels during quieter nighttime periods.

Table 4.11-1: Typical Noise Levels		
Common Outdoor Activities	**Noise Level (dBA)**	**Common Indoor Activities**
	110	Rock Band
Jet flyover at 1,000 feet	105	
	100	
Gas lawn mower at 3 feet	95	
	90	
Diesel truck at 50 feet at 50 mph	85	Food blender at 3 feet
	80	Garbage disposal at 3 feet
Noise urban area, daytime	75	
Gas lawnmower, 100 feet	70	Vacuum cleaner at 10 feet
Commercial area	65	Normal speech at 3 feet
Heavy traffic at 300 feet	60	
	55	Large business office
Quiet urban daytime	50	Dishwasher next room
	45	
Quiet urban nighttime	40	Theater, large conference room
Quiet suburban nighttime	35	
	30	Library
Quite rural nighttime	25	Bedroom at night
	20	
	15	Broadcast/recording studio
	10	
	5	
Typical threshold of human hearing	0	Typical threshold of human hearing
Source: Caltrans, 2013		

Sound Propagation

The energy contained in a sound pressure wave dissipates and is absorbed by the surrounding environment as the sound wave spreads out and travels away from the noise-generating source. The strength of the source is often characterized by its “sound power level.” Sound power level is independent of the distance a receiver is from the source and is a property of the source alone. Knowing the sound power level of an idealized source and its distance from a receiver, the sound pressure level at a specific point (e.g., a property line or a receiver) can be calculated based on geometrical spreading and attenuation (noise reduction) as a result of distance and environmental factors, such as ground cover (asphalt vs. grass or trees), atmospheric absorption, and shielding by terrain or barriers.

For an ideal “point” source of sound, such as mechanical equipment, the energy contained in a sound pressure wave dissipates and is absorbed by the surrounding environment as the sound wave spreads out in a spherical pattern and travels away from the point source. Theoretically, the sound level attenuates, or decreases, by 6 dB with each doubling of distance from the point source. In contrast, a “line” source of sound, such as roadway traffic or a rail line, spreads out in a cylindrical pattern and theoretically attenuates by 3 dB with each doubling of distance from the line source; however, the sound level at a receptor location can be modified further by additional factors. The first is the presence of a reflecting plane such as the ground. For hard ground, a reflecting plane typically increases A weighted sound pressure levels by 3 dB. If some of the reflected sound is absorbed by the surface, this increase will be less than 3 dB. Other factors affecting the predicted sound pressure level are often lumped together into a term called “excess attenuation.” Excess attenuation is the amount of additional attenuation that occurs beyond simple spherical or cylindrical spreading. For sound propagation outdoors, there is almost always excess attenuation, producing lower levels than what would be predicted by spherical or cylindrical spreading. Some examples include attenuation by sound absorption in air; attenuation by barriers; attenuation by rain, sleet, snow, or fog; attenuation by grass, shrubbery, and trees; and attenuation from shadow zones created by wind and temperature gradients. Under certain meteorological conditions, like fog and low-level clouds, some of these excess attenuation mechanisms are reduced or eliminated due to noise reflection.

Noise Effects

Noise effects on human beings are generally categorized as:

- Subjective effects of annoyance, nuisance, and/or dissatisfaction;
- Interference with activities such as speech, sleep, learning, or relaxing;
- Physiological effects such as startling and hearing loss.

Most environmental noise levels produce subjective or interference effects; physiological effects are usually limited to high noise environments such as industrial manufacturing facilities or airports. Such physiological effects occur when the human ear is subjected to extremely high short-term noise levels (i.e., 140 dBA from an explosion) or from a prolonged exposure to high noise environments. For example, to protect workers from noise-induced hearing loss, the U.S. Occupational Safety and Health Administration (OSHA) limits worker noise exposure to 90 dBA as averaged over an 8-hour period (29 CFR 1910.95).

Predicting the subjective and interference effects of noise is difficult due to the wide variation in individual thresholds of annoyance and past experiences with noise; however, an accepted method to determine a person’s subjective reaction to a new noise source is to compare it with the existing environment without the noise source, or the “ambient” noise environment. In general, the more a new noise source exceeds the ambient noise level, the more likely it is to be considered annoying and to disturb normal activities.

Under controlled conditions in an acoustical laboratory, the trained, healthy human ear is able to discern 1-dB changes in sound levels when exposed to steady, single-frequency (“pure-tone”) signals in the mid-frequency (1,000–8,000 Hz) range. In typical noisy environments, changes in noise of 1 to 2 dB are generally not perceptible. However, it is widely accepted that people are able to begin to detect sound level increases of 3 dB in typical noisy environments. Further, a 5

dB increase is generally perceived as a distinctly noticeable increase, and a 10 dB increase is generally perceived as a doubling of loudness by community noise receptors.

Ground-borne Vibration and Noise

Vibration is the movement of particles within a medium or object such as the ground or a building. Vibration may be caused by natural phenomena (e.g., earthquakes, volcanic eruptions, sea waves, landslides) or humans (e.g., explosions, machinery, traffic, trains, construction equipment). Vibration sources are usually characterized as continuous, such as factory machinery, or transient, such as explosions.

As is the case with airborne sound, groundborne vibrations may be described by amplitude and frequency; however, unlike airborne sound, there is no standard way of measuring and reporting amplitude. Vibration amplitudes can be expressed in terms of velocity (inches per second) or discussed in dB units in order to compress the range of numbers required to describe vibration. Vibration impacts to buildings are usually discussed in terms of peak particle velocity (PPV) in inches per second (in/sec). PPV represents the maximum instantaneous positive or negative peak of a vibration signal and is most appropriate for evaluating the potential for building damage. Vibration can impact people, structures, and sensitive equipment. The primary concern related to vibration and people is the potential to annoy those working and residing in the area. Vibration with high enough amplitudes can damage structures (such as crack plaster or destroy windows). Groundborne vibration can also disrupt the use of sensitive medical and scientific instruments, such as electron microscopes.

Common sources of vibration within communities include construction activities and railroads. Ground-borne vibration generated by construction projects is usually highest during pile driving, rock blasting, soil compacting, jack hammering, and demolition-related activities. Next to pile driving, grading activity has the greatest potential for vibration impacts if large bulldozers, large trucks, or other heavy equipment are used.

Groundborne noise is noise generated by vibrating building surfaces such as floors, walls, and ceilings that radiate noise inside buildings subjected to an external source of vibration. The vibration level, the acoustic radiation of the vibrating element, and the acoustical absorption of the room are all factors that affect potential groundborne noise generation.

4.11.2 Environmental Setting

The existing General Plan Noise Element identifies Hillsborough as generally a quiet residential community. The primary contributors to the Town's noise environment include vehicle noise from major roadways such as El Camino Real (State Route, or SR, 82), Interstate 280 (I-280), and SR-92, and aircraft noise from the San Francisco International Airport, which is located approximately 1.7 miles north of the Town limits.

Measured Ambient Noise Levels

The existing ambient noise levels in the Town were monitored in July 2023 (MIG, 2023 see Appendix E). Ambient noise levels were measured with a Larson Davis Soundtrak LxT Type 1 and a Piccolo Type 2 sound level meter. Conditions during the monitoring were generally clear and sunny during the daytime, with daily temperatures between approximately 50 degrees (at

night) and 75 degrees (during the daytime). Winds were generally calm to mild and from the west.

The ambient noise monitoring conducted for this EIR included one (1) long-term and seven (7) short-term (ST) measurements at locations selected to:

- Provide direct observations of existing noise sources at and near Housing Opportunity Sites;
- Determine ambient noise levels at and near Housing Opportunity Sites; and
- Evaluate potential changes in noise levels at sensitive receptors (see "Noise Sensitive Receptors" below).

The ambient noise monitoring locations are shown in Figure 4.11-1 and described below.

- LT-1 was at the southern portion of the Tobin Clark Multi-Family Opportunity Site, west of Tobin Clark Drive and east of Sugar Hill Drive. This location was approximately 420 feet from the centerline of Perimeter Road (along the northern portion of the College of San Mateo). The ambient noise levels measured at location LT-1 are considered representative of the typical daily noise levels near the Tobin Clark Estate and in residential areas in the southern part of the Town.
- ST-1 was on Skyfarm Drive, adjacent to the northwestern portion of the Burlingame Country Club Multi-Family Opportunity Site. The ambient noise levels measured at ST-1 are considered representative of typical daytime noise levels in the residential area near the golf course.
- ST-2 was at the northwestern corner of Floribunda Avenue and Walnut Avenue (the Town Hall Campus Multi-Family Opportunity Site), approximately 30 feet from the centerline of Floribunda Avenue. The ambient noise levels measured at ST-2 are considered representative of typical daytime noise levels in areas of the Town near El Camino Real.
- ST-3 was on Farm Lane, near several Vacant Opportunity Sites. The ambient noise levels measured at ST-3 are considered representative of typical daytime noise levels in residential areas in the central part of the Town.
- ST-4 was on Denise Drive, in the vicinity of a Vacant Opportunity Site on Robinwood Lane and the Hayne Road Subdivision/Lot Split Opportunity Site. The ambient noise levels measured at ST-4 are considered representative of typical daytime noise levels in residential areas in the south-central part of the Town.
- ST-5 was on Macadamia Drive, near a Vacant Opportunity Site. The ambient noise levels measured at ST-5 are considered representative of typical daytime noise levels in residential areas in the northwestern part of the Town.
- ST-6 was located at the end of the Reservoir Road cul de sac (a Vacant Opportunity Site). The ambient noise levels measured at ST-6 are considered representative of typical daytime noise levels in residential areas in the central and eastern parts of the Town.
- ST-7 was located at the end of the cul-de-sac along Grevillea Court, approximately 435 feet from the centerline of Skyline Boulevard, near the Nueva School Multi-Family Opportunity Site. The ambient noise levels measured at ST-7 are considered representative of typical daytime noise levels near the Nueva School and in residential areas near Skyline Boulevard.

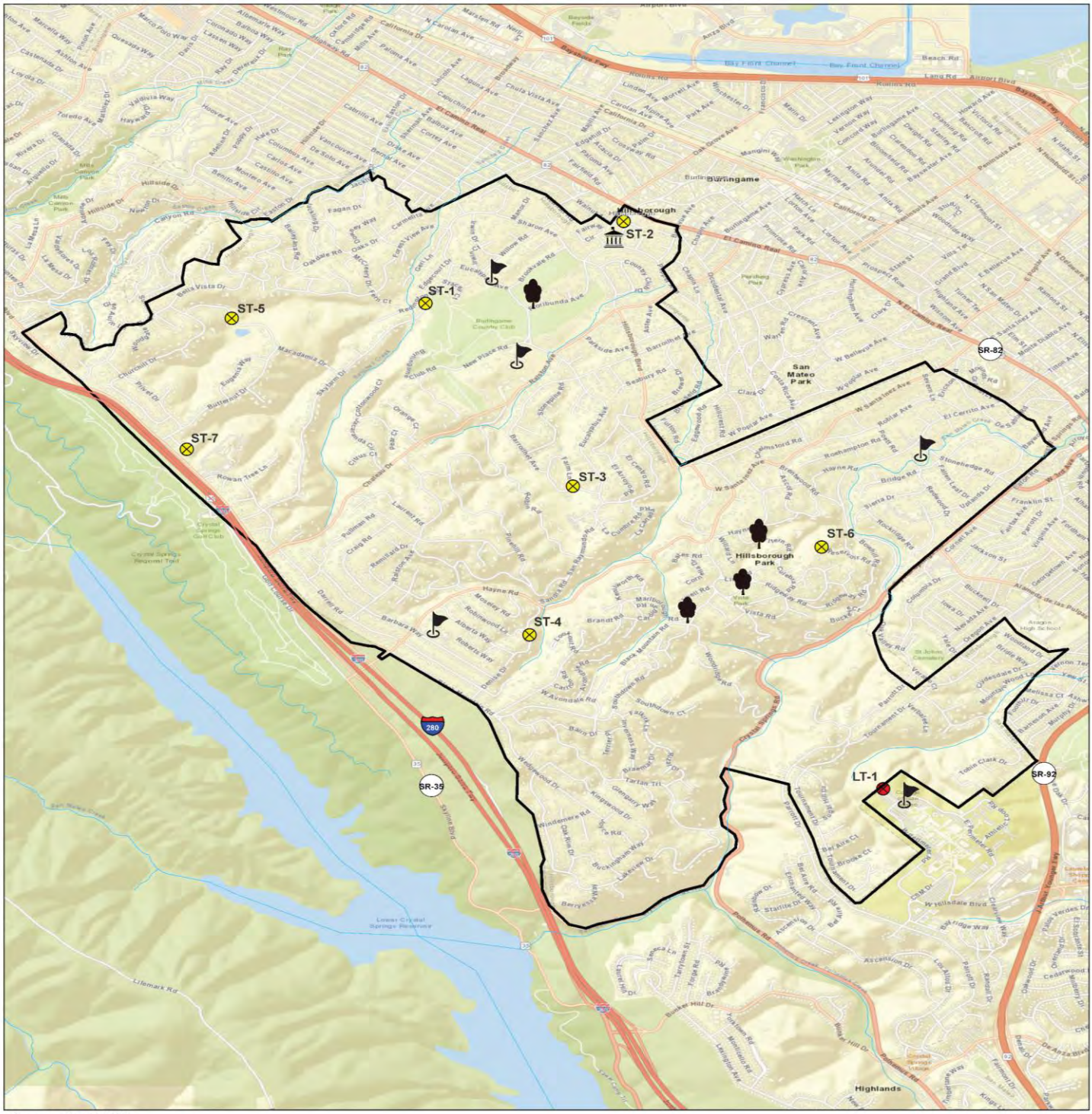


Figure 4.11-1 Noise Monitoring Locations

Based on observations made during the ambient noise monitoring, the existing noise environment in the Planning Area consists primarily of transportation noise sources (motor vehicles and aircraft). Away from major roads, local residential/commercial land use operations also contribute to the local ambient noise environment. Table 4.11-2 and Table 4.11-3 summarize the results of the LT and ST ambient noise monitoring conducted for this EIR.

Table 4.11-2: Measured Long-Term Ambient Noise Levels (dBA) in the Planning Area

Day / Site	Duration	Measured Range in Hourly Noise Levels (dBA L_{eq})(A)			Calculated CNEL(B)
		Daytime (7 AM to 7 PM)	Evening (7 PM to 10 PM)	Nighttime (10 PM to 7 AM)q	
Tuesday, July 25, 2023, to Wednesday, July 26, 2023					
LT-1	24 Hours	45.0 – 52.7	50.8 – 52.8	39.5 – 47.9	53.0

Source: MIG, 2023 (see Appendix E)

Values are the lowest and highest measured average hourly values during the listed time.

The 24-hour CNEL value is calculated by applying a 5 dB penalty to measured evening noise levels and a 10 dB penalty to measured nighttime noise levels. The CNEL is calculated for the following period: 12 PM on Tuesday, July 25, 2023, to 12 PM on Wednesday, July 26, 2023.

Table 4.11-3: Measured Short-Term Ambient Noise Levels (dBA) in the Planning Area

Site	Date	Start Time	Duration	Measured Noise Levels (dBA)					
				$L_{eq}^{(A)}$	$L_{min}^{(B)}$	$L_{90}^{(C)}$	$L_{50}^{(C)}$	$L_{10}^{(C)}$	$L_{max}^{(B)}$
ST-1	7/26/2023	8:50 AM	20 minutes	57.7	40.5	52.8	55.3	61.7	76.1
ST-2	7/26/2023	8:18 AM	20 minutes	61.8	41.2	55.3	60.2	65.5	81.2
ST-3	7/25/2023	1:41 PM	20 minutes	46.8	34.6	42.3	45.6	49.8	63.9
ST-4	7/25/2023	1:11 PM	20 minutes	44.7	35.9	40.5	42.8	47.6	67.8
ST-5	7/26/2023	9:21 AM	20 minutes	54.9	37.1	50.3	53.0	59.0	77.5
ST-6	7/25/2023	12:36 PM	20 minutes	52.1	36.3	43.0	48.4	56.8	76.8
ST-7	7/26/2023	9:52 AM	20 minutes	55.5	51.3	54.7	55.4	56.2	72.7

Source: MIG, 2023 (see Appendix E)

The L_{eq} value represents the equivalent steady-state noise level that would contain the same amount of acoustical energy as the time-varying noise level during the listed period.

The L_{min} and L_{max} represent the lowest and highest instantaneous noise levels measured during the listed period, respectively.

Values represent the noise level exceed a certain percentage of the period, e.g., L_{90} is the noise level that was exceeded 90% of the time for the listed period.

As summarized in Table 4.11-2 and Table 4.11-3, measured daytime noise levels were generally higher in the areas near busier roadways such as Skyfarm Drive (ST-1), El Camino Real (ST-2),

and Skyline Boulevard/I-280 (ST-7), and lower in areas farther away from busier roadways (i.e., ST-3, ST-4, ST-5 and ST-6). Measured noise levels were highest near Hillsborough Town Hall and El Camino Real (ST-1). The calculated CNEL in the southern part of the Town was low, less than 55 CNEL.

Existing 2020 and Future 2040 Without Project Traffic Noise Levels

Existing (Year 2020) traffic noise levels were computed using the U.S. Department of Transportation Federal Highway Administration's (FHWA) Traffic Noise Model (TNM), Version 3.1. The model uses traffic volume, vehicle mix, vehicle speed, roadway geometry, and other variables to compute 24-hour traffic noise levels at user-defined receptor distances from the roadway center. The TNM modeling conducted for this EIR generally incorporates assumptions about motor vehicle traffic and noise levels that are likely to overestimate potential traffic noise levels; specifically, calculations are based on "hard" site conditions, do not incorporate any natural or artificial shielding, and assume all vehicles travel at the posted speed limit. Conversely, the modeling assumes each individual roadway segment has a road grade equal to or less than 3 percent grade (e.g., engine noise is based on travel on generally flat roadways). Roadway segments were modeled as straight-line segments without any flow controls. Modeled noise levels, therefore, represent free-flow traffic conditions.

Peak and non-peak hour traffic volumes, average daily traffic (ADT) volumes, and vehicle fleet mix information was obtained from the travel demand modeling and vehicle miles travelled (VMT) analysis conducted for the Project (see Chapter 4.14, Transportation). The VMT analysis prepared for the Project also includes an analysis of future traffic conditions that would occur in Year 2040 based on continued implementation of the City's current General Plan at the land use development intensities permitted by the current General Plan. Thus, 2040 traffic noise levels without the Project were estimated using the same methodology as described for existing 2020 traffic noise levels.

Modeled traffic noise levels for existing year 2020 and future year 2040 without the Project are shown in Table 4.11-4. Refer to Appendix E for detailed information on existing traffic noise modeling assumptions and distances to specific roadway noise contour levels.

Table 4.11-4: Existing 2020 and Future 2040 Without Project Traffic Noise Levels

Road / Segment	Existing 2020		Future 2040 Without Project		Net Change	
	ADT[(A)]	CNEL[(B)]	ADT[(A)]	CNEL[(B)]	ADT[(A)]	CNEL[(B)]
Black Mountain Rd						
Wedgewood Dr to Hayne Rd	2,694	51.8	2,622	51.7	-72	-0.1
Hayne Rd/West Santa Inez Ave to West Santa Inez Ave	4,080	53.2	3,957	53.1	-123	-0.1
Chateau Dr						
Ralston Ave to Provident Dr	3,186	51.7	3,119	51.6	-67	-0.1
Provident Dr to Skyline Blvd (City Limit)	2,406	52.9	2,646	53.3	240	0.4

Table 4.11-4: Existing 2020 and Future 2040 Without Project Traffic Noise Levels

Road / Segment	Existing 2020		Future 2040 Without Project		Net Change	
	ADT[A]	CNEL[B]	ADT[A]	CNEL[B]	ADT[A]	CNEL[B]
Crystal Springs Rd						
I-280 (City Limit) to Woodridge Rd	2,139	55.7	3,193	57.4	1,055	1.7
Woodridge Rd to Ridgeway Rd	4,098	61.0	4,925	61.8	828	0.8
Ridgeway Rd to Alameda De Las Pulgas	8,078	57.0	8,714	57.3	636	0.3
Alameda De Las Pulgas to Harvard Rd	2,332	49.9	3,475	51.6	1,143	1.7
Harvard Rd to 3rd Ave	2,332	49.9	3,475	51.6	1,143	1.7
3rd Ave to El Camino Real	1,445	47.1	1,884	48.3	438	1.2
El Cerrito Ave						
Brentwood Rd to Crystal Springs Rd	4,831	58.8	5,515	59.4	684	0.6
Floribunda Ave						
El Camino Real (City Limit) to Sharon Ave / Hillsborough Blvd	3,381	53.3	4,091	54.1	709	0.8
Sharon Ave/Hillsborough Blvd to Eucalyptus Ave	1,213	48.6	1,304	48.9	90	0.3
Forest View Ave						
Eucalyptus Ave to Sharon Ave	2,481	51.9	2,202	51.4	-278	-0.5
Sharon Ave to El Camino Real (City Limit)	2,481	51.8	2,604	52.0	123	0.2
Hayne Rd						
Skyline Blvd (City Limit) to Mosely Rd	10,177	61.9	11,166	62.3	989	0.4
Mosely Rd to Sandra Rd	7,528	55.7	8,680	56.3	1,152	0.6
Sandra Rd to Black Mountain Rd	4,080	53.2	3,957	53.1	-123	-0.1
Hillsborough Blvd						
Sharon Ave / Floribunda Ave to Ralston Ave	920	45.1	1,745	47.9	825	2.8
Ralston Ave to Barroilhet Ave	836	45.9	1,660	48.9	824	3.0
Barroilhet Ave to Bromfield Rd	908	46.1	1,731	48.9	822	2.8
Bromfield Rd to Edgewood Rd	111	38.6	110	38.6	-1	0.0

Table 4.11-4: Existing 2020 and Future 2040 Without Project Traffic Noise Levels

Road / Segment	Existing 2020		Future 2040 Without Project		Net Change	
	ADT[A]	CNEL[B]	ADT[A]	CNEL[B]	ADT[A]	CNEL[B]
Ralston Ave						
El Camino Real (City Limit) to Crescent Ave	3,041	53.0	3,191	53.2	150	0.2
Crescent Ave to Occidental Ave	4,781	54.2	5,665	54.9	884	0.7
Occidental Ave to Hillsborough Blvd	1,027	46.5	928	46.1	-99	-0.4
Hillsborough Blvd to Eucalyptus Ave	943	47.5	844	47.0	-100	-0.5
Eucalyptus to Chateau	3,186	52.6	3,119	52.5	-67	-0.1
Sharon Ave						
Forest View Ave to Floribunda Ave / Hillsborough Blvd	1,492	46.8	2,493	49.0	1,001	2.2
Summit Dr						
Skyline Blvd to Bella Vista Dr	3,950	53.1	3,951	53.1	1	0.0
Bella Vista Dr to Oakdale Rd	3,074	51.5	3,086	51.5	12	0.0
Tartan Trail						
Black Mountain Rd to Crystal Springs Rd	1,959	51.3	1,732	50.8	-227	-0.5
Tournament Dr						
Sugar Hill Dr to Tobin Clark Dr	242	40.6	366	42.4	124	1.8
West Santa Inez Ave						
Hillsborough Blvd to Roblar Ave	4,301	53.1	4,177	53.0	-124	-0.1
Roblar Ave to El Camino Real	3,422	55.0	3,323	54.9	-99	-0.1
State Route 35 (Skyline Boulevard)						
Hayne Road to La Strada Ct (City Limit)	1,194	54.3	1,980	56.5	786	2.2
State Route 82 (El Camino Real)						
Forest View Ave to Ralston Ave	10,172	61.6	15,215	63.3	5,044	1.7
State Route 92						
Alameda De Las Pulgas to De Anza Blvd	28,503	69.3	34,145	70.1	5,642	0.8
Interstate 280 (Northbound)						

Table 4.11-4: Existing 2020 and Future 2040 Without Project Traffic Noise Levels

Road / Segment	Existing 2020		Future 2040 Without Project		Net Change	
	ADT[(A)]	CNEL[(B)]	ADT[(A)]	CNEL[(B)]	ADT[(A)]	CNEL[(B)]
Northern City Limit to SR 35	74,478	75.9	95,905	77.0	21,427	1.1
Interstate 280 (Southbound)						
Northern City Limit to SR 35	86,354	76.9	100,369	77.6	14,014	0.7

Source: MIG, 2023 (see Appendix E)

Source: MIG, 2023 (see Appendix E)

ADT is total average daily traffic volume. Volumes are bidirectional for all roadways except I-280.

CNEL is estimated 50 feet from the road center except for SR 92 and I-280, which are estimated 100 feet from the road center). Italicized text indicates the predicted CNEL value is above the Town's normally acceptable noise exposure level (see Table 4.11-7) for the predominant land use present along the modeled roadway segment.

The results of the traffic noise modeling indicate that existing traffic noise levels within the Planning Area are low, less than the Town's normally acceptable noise exposure level for single-family residential land uses (60 CNEL, see Table 4.11-4) for most modeled roadway segments. The modeled traffic noise levels are highest along key arterials and collector roads (Crystal Springs Road, El Camino Real (SR 82), and Hayne Road) and major highways (SR 92 and I-280). Specifically, the modeling shows:

- Crystal Springs Road: Modeled 2020 existing traffic noise levels between Woodridge Road and Ridgeway Road are 61.0 CNEL at 50 feet from the center of the road. Vacant land and single-family residences are the predominant land uses along this segment of Crystal Springs Road. The modeled Year 2020 traffic noise levels on Crystal Springs Road between Woodridge Road and Ridgeway Road are within the Town's conditionally acceptable noise exposure level for residential uses (70 CNEL, see Table 4.11-4**)**. Modeled 2040 traffic noise levels without the Project along this segment of Crystal Spring Road are estimated to increase by less than 1 dB and remain within the conditionally acceptable range.
- El Camino Real (SR 82): Modeled 2020 existing traffic noise levels between Forest View Avenue and Ralston Avenue are 61.6 CNEL at 50 feet from the center of the road. Within the Town, single-family residences are the predominant land uses along this segment of El Camino Real. The modeled Year 2020 traffic noise levels on El Camino Real within the Town's limits are within the Town's conditionally acceptable noise exposure level for residential uses (70 CNEL, see Table 4.11-4). Modeled 2040 without the Project traffic noise levels along this segment of Crystal Spring Road are estimated to increase by less than 2 dB and remain within the conditionally acceptable range.
- Hayne Road: Modeled 2020 existing traffic noise levels between the Town's western limit and Moseley Road are 61.9 CNEL at 50 feet from the center of the road. Single-family residences are the predominant land use along this segment of Hayne Road. The modeled Year 2020 traffic noise levels on Hayne Road between approximately SR 35 and Moseley Road are within the Town's conditionally acceptable noise exposure level

for residential uses (70 CNEL, see Table 4.11-4). Modeled 2040 without the Project traffic noise levels along this segment of Hayne Road are estimated to increase by less than 1 dB and remain within the conditionally acceptable range.

- SR 92: Modeled 2020 existing traffic noise levels on SR 92 in the vicinity of the Town are 69.3 CNEL at 100 feet from the center of the highway. Single-family residences are the closest land use within the Town to SR 92. The modeled Year 2020 traffic noise levels on SR 92 near the Town are within the Town's conditionally acceptable noise exposure level for residential uses (70 CNEL, see Table 4.11-4). Modeled 2040 without the Project traffic noise levels along SR 92 in the vicinity of the Town are estimated to increase by less than 1 dB to 70.1 CNEL, which would be within the Town's normally unacceptable range for single-family residential land uses.
- I-280: Modeled 2020 existing traffic noise levels on I-280 in the vicinity of the Town range from 75.9 CNEL (northbound) to 76.9 CNEL (southbound) at 100 feet from the center of the highway. Single-family residences, education facilities, and recreation lands are the land uses within the Town generally located along the I-280 corridor. The modeled Year 2020 traffic noise levels along I-280 are within the Town's normally unacceptable noise exposure range for educational facilities (80 CNEL, see Table 4.11-4), and above the Town's normally unacceptable noise exposure level for residential uses (75 CNEL). Modeled 2040 without the Project traffic noise levels along SR 92 in the vicinity of the Town are estimated to increase by less than 1.1 dB and remain within the same compatibility ranges.

Airport-Related Noise Levels

At its closest, the Town of Hillsborough is approximately 2.3 miles south of the nearest runway centerline associated with San Francisco International Airport (SFO) and approximately 4.6 miles northwest of the nearest runway centerline associated with San Carlos Airport.

The Town's General Plan Noise Element identifies that aircraft noise associated with SFO operations is an issue due to the Town's proximity to the airport. Most aircraft-noise related issues are associated with a single low frequency event (e.g., a specific airplane departure procedure) or airplane maintenance activities late at night or early in the morning. According to the Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport, the northern part of the Town lies within SFO Airport Influence Area B and is subject to real estate disclosure requirements, but no part of the Town is located within an SFO noise impact zone (C/CAG 2012). The SFO Aircraft Noise Office maintains an aircraft noise monitoring station on Skyfarm Drive, in the western part of the Town, approximately 2.9 miles south of the nearest SFO runway centerline (SFO, 2023a). The latest quarterly report released by SFO indicates average monthly airport CNEL levels at this monitoring site from October 2022 to December 2022 ranged from 29.5 to 46.9 dBA. Other SFO-related noise monitoring on Sharon Avenue in May 2022 indicated SFO airplane related noise levels increased the ambient noise level in the Town by less than 1 dBA (SFO, 2023b).

The Town's General Plan identifies that aircraft noise from San Carlos Airport is generally not an issue due to the fact the airport is located farther away and serves smaller aircraft. According to the Comprehensive Airport Land Use Compatibility Plan for the Environs of San Carlos Airport, the part of the Town south of Chateau Drive lies within Airport Influence Area A and is subject to real estate disclosure requirements, but no part of the Town is located within a San Carlos Airport noise impact zone (C/CAG 2015).

Other Non-Transportation Noise Sources

Non-transportation sources also contribute to the Planning Area's existing noise environment. School operation and outdoor park and recreation facilities, and residential land uses generate noise from daily operations of landscaping equipment, stationary sources such as heating, ventilation, and air conditioning (HVAC) equipment, business deliveries, solid waste pickup services, etc. Such sources are considered local sources of noise that only influence the immediate surroundings.

Noise Sensitive Receptors

Noise-sensitive receptors are buildings or areas where unwanted sound or increases in sound may have an adverse effect on people or land uses. Residential areas, motels and hotels, hospitals and health care facilities, school facilities, and parks are examples of noise receptors that could be sensitive to changes in existing environmental noise levels. Hillsborough is unique in that most land uses within the Town are noise-sensitive, mainly because the Town consists of mostly residential and school land uses. In addition to existing sensitive noise receptors, the proposed Project would increase development density in the Town and would provide for new residential and mixed use residential opportunities.

4.11.3 Regulatory Setting

State

California Building Standards Code

The California Building Standards Code, contained in Title 24 of the California Code of Regulations and consisting of 11 different parts, sets forth various construction and building requirements. Part 2, California Building Code, Section 1206, Sound Transmission, establishes sound transmission standards for interior walls, partitions, and floor/ceiling assemblies. Specifically, Section 1206.4 establishes that interior noise levels attributable to exterior noise sources shall not exceed 45 dB in any habitable room. The noise metric shall be either DNL or CNEL, consistent with the noise element of the local general plan.

Caltrans

The California Department of Transportation's (Caltrans) Transportation and Construction Vibration Guidance Manual provides a summary of vibration criteria that have been reported by researchers, organizations, and governmental agencies and provides recommended guidelines for evaluating potential vibration impacts on buildings (i.e., structural damage) and humans (i.e., annoyance) from transportation and construction projects. These thresholds are summarized in Table 4.11-5 and Table 4.11-6**.** The thresholds vary depending on whether the vibration source is continuous or transient in nature. A transient source creates an isolated vibration event, such as blasting. Continuous sources could also include sources with intermittent but frequent vibration events, such as impact pile drivers and compactors. While vehicle traffic is considered a continuous vibration source, many types of construction activities fall between continuous and transient in nature.

Table 4.11-5: Caltrans' Vibration Threshold Criteria for Building Damage		
	Maximum PPV (in/sec)	
Structural and Condition	Transient Sources	Continuous/Frequent Intermittent Sources
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some older buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial and commercial structures	2.0	0.5
Source: Caltrans, 2020		

Table 4.11-6: Caltrans' Vibration Threshold Criteria for Human Response		
	Maximum PPV (in/sec)	
Human Response	Transient Sources	Continuous/Frequent Intermittent Sources
Barely perceptible	0.04	0.01
Distinctly perceptible	0.25	0.04
Strongly perceptible	0.9	0.10
Severe	2.0	0.4
Source: Caltrans, 2020		

Regional

City/County Association of Governments of San Mateo County

The C/CAG Board serves as the Airport Land Use Commission (ALUC) and is responsible for protecting public health, safety, and welfare by ensuring the orderly expansion of airports and the adoption of land use measures that minimize the public's exposure to excessive noise and safety hazards within areas around public airports. The ALUC reviews proposed land use plans and development in the vicinity of SFO and San Carlos Airport to ensure that land use changes are compatible with these airport's respective ALUP. These ALUPs are discussed below.

The SFO Comprehensive ALUP was adopted in November 2012. The ALUP identifies two airport influence areas for SFO. Airport Influence Area A includes all of San Mateo County while Airport Influence Area B includes specific areas closer to the airport that are within defined noise and safety zones and other areas regulated by the Federal Aviation Administration. The SFO ALUP generally sets 70 CNEL as the conditionally compatible noise level for residential land uses.

The Town of Hillsborough is not located within any defined noise or safety zone for SFO, but is located within Airport Influence Area A, and a part of the Town generally north of Chateau Drive is located within Airport Influence Area B. Consistent with state law, SFO ALUP policies require real estate transaction disclosures for properties within the airport's influence areas. The disclosures must identify the property is in the vicinity of an airport and may be subject to annoyances or inconveniences associated with proximity to airport operations.

The San Carlos Airport Land Use Plan was adopted in October 2015. Similar to SFO, the San Carlos Airport ALUP includes Airport Influence Area A, which includes most of San Mateo County, and Airport Influence Area B, which includes areas closer to the airport that are subject to more stringent regulations. The San Carlos Airport ALUP generally sets 60 CNEL as the conditionally compatible noise level for residential land uses. The Town of Hillsborough is not located within any defined noise or safety zone for San Carlos Airport, but the part of the Town generally south of Chateau Drive is located within Airport Influence Area A. Like the SFO ALUP, the San Carlos ALUP policies require real estate transaction disclosures for properties within this influence area.

Local

Town of Hillsborough General Plan

The Noise Element of the Town's General Plan includes goals, policies, and actions to minimize problems from intrusive sound and ensure new development does not generate unacceptable noise levels. Relevant goals, policies, and actions include (Hillsborough, 2005):

Goal N-1 - Minimize noise levels within neighborhoods so that residents may enjoy the benefits normally associated with residential communities.

Policy N-1.1 - Encourage new development in noise impacted areas to provide effective noise insulation measures.

Policy N-1.2 - Eliminate excessive noise within the community to the extent feasible. When noise cannot be eliminated completely, regulate noise generation to minimize impacts.

Policy N-1.3 - Continue to enforce local and State noise regulations to minimize noise impacts associated with construction and public and private activities.

Policy N-1.4 - Work with State, regional and local governments and agencies to reduce noise from roadways adjacent to Hillsborough.

Action N-1.1 - The Town will continue to advocate that noise abatement measures be taken by the California Department of Transportation (Caltrans) for Caltrans roadways affecting the Town, whenever feasible. A representative from Hillsborough should attend any Caltrans meetings or public hearings where improvements or modifications to roadways affecting the Town may be discussed.

Action N-1.2 - The Town will continue to enforce the existing Noise Ordinance, Response to Unruly Gatherings Ordinance and Toy Ordinance.

Action N-1.3 - The Hillsborough Police Department will continue to enforce the California Vehicle Code pertaining to noise standards for cars, trucks and motorcycles.

Goal N-2 - Continue to monitor airport operations and influence airport policy to minimize the impact of airport-generated noise on Hillsborough.

Policy N-2.1 - Advocate ongoing noise remediation efforts at the San Francisco International Airport.

Policy N-2.2 - Continue to participate in regional airport planning efforts.

Action N-2.1 - The Town will continue to participate on the Airport/Community Roundtable and coordinate with the SFO Airport Land Use Commission and SFO's Aircraft Noise Abatement Office. All noise issues affecting the Town should be monitored and the City Council should be briefed on all issues so that required actions can be implemented.

Action N-2.2 - The Town will cooperate with the Comprehensive Airport Land Use Plans' requirements for review of proposed land use policy actions and real estate notification for property located within an influence area for the San Francisco International Airport or the San Carlos Airport.

Additionally, the General Plan Noise Element establishes land use compatibility standards shown in Table 4.11-7.

Table 4.11-7: Land Use and Noise Compatibility Guidelines

Land Use Category	Community Noise Exposure Level (CNEL), dBA			
	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Clearly Unacceptable
Residential: Low Density Single Family, Duplex, Mobile Homes	<60	55-70	70-75	>75
Residential: Multi-Family	<65	60-70	70-75	>75
Transient Lodging: Motels, Hotels	<65	60-70	70-80	>80
Schools, Libraries, Churches, Hospitals, Nursing Homes	<70	60-70	70-80	>80
Auditoriums, Concert Halls, Amphitheaters	--	<70	65<	--
Sports Arena, Outdoor Spectator	--	<75	--	>70
Playgrounds, Neighborhood Parks	<70	--	67-75	>72
Golf Courses, Riding Stables, Water Recreation, Cemetaries	<75	--	70-80	>80
Office Buildings, Business, Commercial and Professional	<70	67-77	75<	--
Industrial, Manufacturing, Utilities, Agriculture	<75	70-80	75<	--

Source: Town of Hillsborough 2005, General Plan Figure N-1

Town of Hillsborough Municipal Code

Title 8 of the Town of Hillsborough Municipal Code, Chapter 8.32, Noise, establishes it is the Town's policy that the peace, health, safety, and welfare of the Town's residents requires protection from excessive, unnecessary, and unreasonable noises from any and all sources in the Town. The Municipal Code defines both normal noise and discretionary noise and generally establishes limitations for discretionary noise sources. Normal noise consists of vehicular traffic, household appliances usually used in the living areas of a residential dwelling and similar articles used indoors, human voices, domestic pets, wildlife, weather and other forces of nature, and the other inevitable and ordinary noises of living (Municipal Code Section 8.32.030). Discretionary noise consists of construction heavy machinery, gas- and electric-powered gardening devices, residential power equipment, other powered outdoor equipment, and the noises of other activities and devices not included in normal noise (Municipal Code Section 8.32.030). The Municipal Code allows normal noise at any time seven days of the week, but discretionary noise is limited as follows (Municipal Code Section 8.32.040):

- Monday through Friday (except holidays observed by the Town, meaning that the city clerk's office is closed for observance of the weekday holiday):
  - Between 8:00 AM and 5:00 PM. Anyone may perform construction, alteration, demolition or repair, and anyone may operate residential power equipment provided that the noise level from all sources combined (whatever the sources are), as measured twenty-five feet outside the property line, shall not exceed 100 dBA. This standard is the "property plane standard."
  - Between 5:00 PM and 8:00 PM. Property owners and residents (and family members of either) may operate (on the owner's or resident's property) residential power equipment if the property plane standard is met.
  - Between 9:00 AM and 5:00 PM. Anyone may operate gas-powered or electric-powered gardening devices that do not produce a total combined noise level in excess of 70 dBA when measured from a distance of 25 feet from the loudest operating motor.
- Saturday:
  - No leaf blowers at any time;
  - Between 10:00 AM and 5:00 PM. Owners and residents (and family members of either) may operate (on the owner's or resident's property) devices, equipment and machines, other than leaf blowers, that do not produce, singly or in combination, a total combined noise level of more than 70 dBA outside of the property plane.
  - Anyone may perform construction, alteration, demolition or repair pursuant to a valid building or other applicable permit issued by the Town so long as the activities do not produce, singly or in combination, a total combined noise level of more than 70 dBA outside of the property plane; provided, however, that the building permit or other applicable permit may contain restrictions beyond those in this section, in which case, such greater restrictions shall control.
- Sunday and weekday holiday: no discretionary noise of any kind.

The Town's Municipal Code excepts certain activities from the above discretionary noise limitations, including:

- Refuse collection activities permitted in accordance with the Municipal Code and provided the activities do not produce a noise level in excess of 95 dBA at a distance of 25 feet from the source.
- Audible warning devices required by law to protect the health, safety, and welfare of the community so long as they do not produce a noise level more than 3 dBA above the standard or minimum level stipulated by law. This is in addition to the requirements for burglary, fire, and robbery alarms set by Chapter 5.12 of the Municipal Code. Vehicle horns or other devices primarily intended to create a loud noise for warning purposes shall comply with the applicable provisions of the California Vehicle Code and other applicable law.
- Sound performances and special events not exceeding 80 dBA measured at a distance of 50 feet from the source when approval therefore has been obtained from the appropriate governmental entity.
- Emergencies.
- In addition to the above noise standards, Municipal Code Section 8.16.030 states that all loud and unusual noises and annoying vibrations which offend the peace, quiet and tranquility of persons of ordinary sensibilities are expressly declared to be public nuisances adversely affecting the public peace and safety.

4.11.4 Thresholds of Significance

Per the CEQA Guidelines, Project implementation would have a significant impact related to noise or vibration if it will result in:

A. Generation of a substantial temporary or permanent increase in ambient noise levels 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; or

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, expose people residing or working in the project area to excessive noise levels.

With regard to criteria (A), the proposed Project would result in a significant construction and/or operational noise impact if it would:

- Conflict with or violate any applicable provision of Municipal Code Chapter 8.32
- Conflict with or violate any applicable standard or policy in the City's General Plan Noise Element
- Generate operational traffic noise levels that increase ambient noise levels at off-site locations by:
  - 5 dBA or more where the ambient noise level would change from normally acceptable to conditionally acceptable;
  - 3 dBA or more where the existing ambient noise would change from conditionally acceptable to normally unacceptable; or
  - 1 dBA or more where the existing ambient noise level is already normally unacceptable.

With regard to criterion (B), the proposed Project would result in a significant construction and/or operational vibration impact if it would:

- Generate construction-related vibration levels that exceed Caltrans' guidance for potential building damage (see Table 4.11-5); or
- Generate construction-related vibration levels that exceed Caltrans' criteria for severe human annoyance (see Table 4.11-6).

With regard to criterion (C), the proposed Project would expose people living or working in the Planning Area to excessive airport-related noise levels if it would conflict with an applicable ALUP or otherwise expose people to excessive airport-related noise levels from a private air facility.

4.11.5 Impacts and Mitigation Measures

The proposed Project consists of updates to the existing 2014 - 2022 Housing Element to reflect the 6th cycle 2023 – 2031 housing assignments. In addition, associated amendments to the Land Use Element and General Plan Land Use Map, Open Space and Conservation Element, and Public Safety Element; amendments to Title 17 (Zoning) of the Hillsborough Municipal Code, and amendments to the Hillsborough Zoning Map are proposed for consistency of all Town documents, codes, and regulations. These associated amendments are generally described in sections 3.3.9 through 3.3.12 in the Project Description and would not result in environmental impacts related to noise. Therefore, they are not discussed further in this chapter. The impact analysis focuses on the residential development that would be facilitated by the Draft 2023 – 2031 Housing Element.

The proposed Project provides updated planning objectives, policies, and programs that are intended to support and provide opportunities for housing development, including accessory dwelling units (ADUs) on existing residential properties throughout the Town (Housing Element Approach 1), Vacant Opportunity Sites (Housing Element Approach 3), Subdivision/Lot Split Opportunity Sites (Housing Element Approach 4) and new Multi-Family Opportunity Sites (Housing Element Approach 5) that are generally consistent with the Town's current low density land uses. The Project's noise- and vibration-related impacts can be divided into short-term construction-related impacts and long-term operations-related impacts (housing occupancy). Construction-related impacts are associated with the construction activities likely to occur in conjunction with future housing development. Long-term noise exposure is associated with the change in, or introduction of, substantial noise sources (e.g., traffic and stationary sources) in the Town as a result of new housing facilitated by the proposed Project. These impacts are evaluated below.

Impact NOI-1 – Generation of a substantial temporary or permanent increase in ambient noise levels in excess of standards established in the local General Plan or Noise Ordinance, or applicable standards of other agencies. *[Threshold of Significance (a)]*

Temporary Construction Noise Levels

Project-specific information for future housing development is not available at this time. Therefore, potential temporary construction-related noise impacts can only be evaluated based on the typical construction activities associated with single- and multi-family residential development. Potential construction source noises were developed based on methodologies,

reference noise levels, typical equipment usage, and other factors documented and contained in the Federal Highway Administration's (FHWA) Construction Noise Handbook (FHWA 2006), Federal Transit Administration's (FTA) Transit Noise and Vibration Impact Assessment document (FTA 2018), and Caltrans' Transportation and Construction Vibration Guidance Manual (Caltrans 2013). Reference levels are noise emissions for specific equipment or activity types that are well-documented and for which their usage is common practice in the field of acoustics.

Construction activities associated with potential housing development projects could include: staging, demolition, site preparation (e.g., land clearing), fine and mass grading, utility trenching, foundation work (e.g., excavation, pouring concrete pads, potential drilling for piers or piles), material deliveries (requiring travel along Town roads), building construction (e.g., framing, concrete pouring, welding), paving, coating application, and site finishing work. In general, these activities would involve the use of worker vehicles, delivery trucks, haul trucks, and heavy-duty construction equipment such as (but not limited to) backhoes, tractors, loaders, graders, excavators, rollers, cranes, material lifts, generators, and air compressors. These types of construction activities would generate noise and vibration from the following sources:

- Heavy equipment operations at different work areas. Some heavy equipment would consist of mobile equipment such as a loader and excavator that would move around work areas; other equipment would consist of stationary equipment (e.g., cranes or material hoists/lifts) that would generally operate in a fixed location until work activities are complete. Heavy equipment generates noise from engine operation, mechanical systems and components (e.g., fans, gears, propulsion of wheels or tracks), and other sources such as backup alarms. Mobile equipment generally operates at different loads, or power outputs, and produces higher or lower noise levels depending on the operating load. Stationary equipment generally operates at a steady power output that produces a constant noise level.
- Vehicle trips, including worker, vendor, and haul truck trips. These trips are most likely to occur on key roads and travel corridors that provide access to Housing Opportunity Sites. Worker trips usually consist of passenger cars and light- to medium-duty trucks. Vendor and haul truck trips usually consist of medium-heavy and heavy-heavy duty trucks.

Table 4.11-8 presents the noise levels associated with the typical types of construction equipment that could be used to construct future housing projects at Housing Opportunity Sites.

Table 4.11-8: Typical Construction Equipment Noise Levels (dBA)

Equipment	Reference Noise Level at 50 Feet (L_{max})(A)	Percent Usage Factor(B)	Predicted Noise Levels (L_{eq}) at Distance(C)					
			50 Feet	100 Feet	200 Feet	300 Feet	400 Feet	500 Feet
Auger Drill Rig	85	0.2	78	72	66	62	60	58
Backhoe	80	0.4	76	70	64	60	58	56
Boring Jack Power Unit	80	0.5	77	71	65	61	59	57
Bulldozer	85	0.4	81	75	69	65	63	61

Table 4.11-8: Typical Construction Equipment Noise Levels (dBA)

Equipment	Reference Noise Level at 50 Feet (L_{max})(A)	Percent Usage Factor(B)	Predicted Noise Levels (L_{eq}) at Distance(C)					
			50 Feet	100 Feet	200 Feet	300 Feet	400 Feet	500 Feet
Compact roller	80	0.2	73	67	61	57	55	53
Compressor	80	0.4	76	70	64	60	58	56
Concrete Mixer	85	0.4	81	75	69	65	63	61
Crane	85	0.16	77	71	65	61	59	57
Delivery Truck	84	0.4	80	74	68	64	62	60
Excavator	85	0.4	81	75	69	65	63	61
Front End Loader	80	0.4	76	70	64	60	58	56
Generator	82	0.5	79	73	67	63	61	59
Grader	85	0.4	81	75	69	65	63	61
Horizontal Boring Hydraulic Jack	80	0.25	74	68	62	58	56	54
Impact Pile Driver (low)	95	0.2	88	82	76	72	70	68
Impact Pile Driver (high)	101	0.2	94	88	82	78	76	74
Man Lift	85	0.2	78	72	66	62	60	58
Paver	85	0.5	82	76	70	66	64	62
Pneumatic tools	85	0.5	82	76	70	66	64	62
Pumps	77	0.5	74	68	62	58	56	54
Roller	85	0.2	78	72	66	62	60	58
Scraper	85	0.4	81	75	69	65	63	61
Tractor	84	0.4	80	74	68	64	62	60
Vacuum Truck	85	0.4	81	75	69	65	63	61

Sources: Caltrans, 2020 and FHWA, 2010

L_{max} noise levels based on manufacturer's specifications.

Usage factor refers to the amount of time the equipment produces noise over the time period.

Estimate does not account for any atmospheric or ground attenuation factors. Calculated noise levels based on Caltrans, 2020: L_{eq} (hourly) = L_{max} at 50 feet – 20log (D/50) + 10log (UF), where: L_{max} = reference L_{max} from manufacturer or other source; D = distance of interest; UF = usage fraction or fraction of time period of interest equipment is in use.

The potential for substantial temporary increases in noise levels is generally limited to construction activities that occur in areas near or immediately adjoining noise-sensitive land uses, during noise-sensitive times of the day, and/or for extended periods of time. Demolition,

site preparation, and grading phases typically result in the highest temporary noise levels due to the use of heavy-duty equipment such as bulldozers, excavators, graders, loaders, scrapers, and trucks throughout a site, including the perimeter of the site, which may be bordered by noise sensitive land uses. As shown in Table 4.11-8, the worst-case noise levels associated with the operation of this heavy site preparation and grading equipment (e.g., a grader) are predicted to be approximately 81 dBA L_{eq} and 85 dBA L_{max} at a distance of 50 feet from the equipment operating area.

At an active construction site, it is not uncommon for two or more pieces of construction equipment to operate at the same time and in close proximity. The concurrent operation of two or more pieces of construction equipment would result in noise levels of approximately 84 dBA L_{eq} at a distance of 50 feet from equipment operating areas.[39] Building foundation, building construction, coating, and site finishing activities also involve heavy equipment (e.g., cranes, material lifts) and stationary noise sources (e.g., generators, welding equipment, compressors); however, this equipment usually operates at or near the building footprint and is set back from the site perimeter and farther away from adjacent noise-sensitive land uses. As shown in Table 4.11-8**,** the worst-case L_{eq} and L_{max} noise levels associated with building construction equipment (e.g., a crane) are predicted to be approximately 79 dBA L_{eq} and 82 dBA L_{max}, at a distance of 50 feet.

The magnitude of each individual future project's temporary and periodic increase in ambient noise levels would depend on a number of project-specific factors that are not known at this time, including: the amount and type of equipment being used; the distance between the area where equipment is being operated and the location of the specific land use or receptor where noise levels are being evaluated; the time of day construction activities are occurring; the presence or absence of any walls, buildings, or other barriers that may absorb or reflect sound waves; the total duration of the construction activities; and the existing ambient noise levels near construction areas.

Regardless of these factors, the General Plan Noise Element and Municipal Code include provisions to address temporary construction noise levels. General Plan Policy N-1.3 requires enforcement of local noise regulations that minimize noise impacts associated with construction activities, and Municipal Code Section 8.32.040 limits the time when construction activities and the noise levels that construction activities can generate. Specifically, the Municipal Code limits construction noise levels to no more than 100 dBA Monday to Friday, 8:00 AM to 5:00 PM (Municipal Code Section 8.32.040.B.1.a), and 70 dBA on Saturdays, 9:00 AM to 5:00 PM, pursuant to a valid building or other applicable permit issued by the Town (Municipal Code Section 8.32.040.B.2); construction activities on Sundays and weekday holidays are prohibited (Municipal Code Section 8.32.040.B.3). These restrictions limit construction activities to daytime periods only, when people are generally less sensitive to temporary increases in noise levels

[39] As shown in Table 4.11-8**,** a single bulldozer provides a sound level of 81 dBA L_{eq} at a distance of 50 feet; when two identical sound levels are combined, the noise level increases to 84 dBA L_{eq} and when three identical sound levels are combined, the noise level increases to 86 dBA L_{eq}. These estimates assume no shielding or other noise control measures are in place at or near the work areas. In general, maximum equipment noise levels do not occur in the same place at the same time and, therefore, maximum noise levels from two or more pieces of equipment are not combined for noise estimation purposes.

because they are awake, use to higher daytime noise levels, and possibly away from home for some of the day.

Future residential development facilitated by the proposed Project would result in construction activities that could temporarily increase ambient noise levels near construction sites; however, the City's existing Municipal Code and General Plan requirements would ensure construction activities do not occur during the most sensitive time periods (e.g., evening and nighttime periods) or otherwise result in a substantial temporary increase in ambient noise levels that exceeds the City's Municipal Code Standards. This impact would be ***less than significant***.

Substantial Permanent Increases in Noise Levels.

The proposed Project would facilitate the development of new residential housing within the Planning Area, which would increase the number of residents in the Town. This increase in population could lead to increased vehicle traffic on the local roadway system, which could result in traffic-related noise levels that pose land use compatibility issues or result in a substantial permanent increase in traffic-related noise levels throughout the Planning Area. Project implementation would also involve increases in stationary noise and other sources of noise within the Planning Area from new residential development. These potential effects are evaluated below.

Increases in Traffic Noise Levels

Although the Project does not authorize any specific development project or increase existing vehicular traffic levels, a transportation engineering firm conducted a quantitative assessment of potential changes in VMT associated with the implementation of the Project for this EIR (W-Trans, 2023; see Chapter 4.14, Transportation). This quantitative assessment provides a sufficient level of detail to evaluate the potential future increases in traffic-related noise levels on key roads in the Town.

Future 2040 traffic noise levels with the proposed Project were computed using the same methodology and data sources used to calculate existing (Year 2020) and future baseline (Year 2040) traffic noise levels (see Section 4.11.2, "Existing 2020 and Future 2040 Without Project Traffic Noise Levels), but 2040 Project traffic levels with the Project were determined by the VMT analysis and entered into the traffic model. Table 4.11-9 and Table 4.11-10, respectively, summarize the net change in traffic volumes and traffic noise levels that would occur between existing Year 2020 and future Year 2040 conditions with the Project, and between future Year 2040 conditions with and without the implementation of the Project. Refer to Appendix E for detailed transportation noise modeling results.

Table 4.11-9: Existing (2020) and Future (2040 with Project) Traffic Noise Levels

Road / Segment	Existing 2020		Future 2040 With Project		Net Change	
	ADT[(A)]	CNEL[(B)]	ADT[(A)]	CNEL[(B)]	ADT[(A)]	CNEL[(B)]
Black Mountain Rd						
Wedgewood Dr to Hayne Rd	2,694	51.8	2,895	52.1	201	0.3

Table 4.11-9: Existing (2020) and Future (2040 with Project) Traffic Noise Levels						
	Existing 2020		Future 2040 With Project		Net Change	
Road / Segment	ADT[A]	CNEL[B]	ADT[A]	CNEL[B]	ADT[A]	CNEL[B]
Hayne Rd/West Santa Inez Ave to West Santa Inez Ave	4,080	53.2	4,002	53.1	-78	-0.1
Chateau Dr						
Ralston Ave to Provident Dr	3,186	51.7	3,471	52.1	285	0.4
Provident Dr to Skyline Blvd (City Limit)	2,406	52.9	2,939	53.8	533	0.9
Crystal Springs Rd						
Polhemus Rd (City Limit) to Woodridge Rd	2,139	55.7	3,214	57.5	1,075	1.8
Woodridge Rd to Ridgeway Rd	4,098	61.0	5,113	62.0	1,015	1.0
Ridgeway Rd to Alameda De Las Pulgas	8,078	57.0	9,161	57.5	1,083	0.5
Alameda De Las Pulgas to Harvard Rd	2,332	49.9	3,555	51.7	1,223	1.8
Harvard Rd to 3rd Ave	2,332	49.9	3,555	51.7	1,223	1.8
3rd Ave to El Camino Real	1,445	47.1	1,903	48.3	458	1.2
El Cerrito Ave						
Brentwood Rd to Crystal Springs Rd	4,831	58.8	5,874	59.6	1,043	0.8
Floribunda Ave						
El Camino Real (City Limit) to Sharon Ave / Hillsborough Blvd	3,381	53.3	4,370	54.4	989	1.1
Sharon Ave/Hillsborough Blvd to Eucalyptus Ave	1,213	48.6	1,428	49.3	215	0.7
Forest View Ave						
Eucalyptus Ave to Sharon Ave	2,481	51.9	2,457	51.9	-24	0.0
Sharon Ave to El Camino Real (City Limit)	2,481	51.8	2,886	52.5	405	0.7
Hayne Rd						
Skyline Blvd (City Limit) to Mosely Rd	10,177	61.9	11,457	62.4	1,280	0.5
Mosely Rd to Sandra Rd	7,528	55.7	8,736	56.3	1,208	0.6
Sandra Rd to Black Mountain Rd	4,080	53.2	4,002	53.1	-78	-0.1

Table 4.11-9: Existing (2020) and Future (2040 with Project) Traffic Noise Levels						
	Existing 2020		Future 2040 With Project		Net Change	
Road / Segment	ADT[A]	CNEL[B]	ADT[A]	CNEL[B]	ADT[A]	CNEL[B]
Hillsborough Blvd						
Sharon Ave / Floribunda Ave to Ralston Ave	920	45.1	1,761	47.9	842	2.8
Ralston Ave to Barroilhet Ave	836	45.9	1,669	48.9	833	3.0
Barroilhet Ave to Bromfield Rd	908	46.1	1,751	49.0	843	2.9
Bromfield Rd to Edgewood Rd	111	38.6	127	39.2	17	0.6
Ralston Ave						
El Camino Real (City Limit) to Crescent Ave	3,041	53.0	3,242	53.3	202	0.3
Crescent Ave to Occidental Ave	4,781	54.2	5,713	55.0	932	0.8
Occidental Ave to Hillsborough Blvd	1,027	46.5	1,047	46.6	20	0.1
Hillsborough Blvd to Eucalyptus Ave	943	47.5	955	47.6	11	0.1
Eucalyptus to Chateau	3,186	52.6	3,471	53.0	285	0.4
Sharon Ave						
Forest View Ave to Floribunda Ave / Hillsborough Blvd	1,492	46.8	2,739	49.4	1,247	2.6
Summit Dr						
Skyline Blvd to Bella Vista Dr	3,950	53.1	4,312	53.5	361	0.4
Bella Vista Dr to Oakdale Rd	3,074	51.5	3,233	51.7	159	0.2
Tartan Trail						
Black Mountain Rd to Crystal Springs Rd	1,959	51.3	1,899	51.2	-60	-0.1
Tournament Dr						
Sugar Hill Dr to Tobin Clark Dr	242	40.6	441	43.2	199	2.6
West Santa Inez Ave						
Hillsborough Blvd to Roblar Ave	4,301	53.1	4,257	53.1	-44	0.0
Roblar Ave to El Camino Real	3,422	55.0	3,224	54.7	-198	-0.3
State Route 35 (Skyline Boulevard)						
Hayne Road to La Strada Ct (City Limit)	1,194	54.3	2,075	56.7	881	2.4
State Route 82 (El Camino Real)						

Table 4.11-9: Existing (2020) and Future (2040 with Project) Traffic Noise Levels

Road / Segment	Existing 2020		Future 2040 With Project		Net Change	
	ADT[A]	CNEL[B]	ADT[A]	CNEL[B]	ADT[A]	CNEL[B]
Forest View Ave to Ralston Ave	10,172	61.6	15,224	63.4	5,052	1.8
State Route 92						
Alameda De Las Pulgas to De Anza Blvd	28,503	69.3	34,130	70.1	5,627	0.8
Interstate 280 (Northbound)						
Northern City Limit to SR 35	74,478	75.9	96,020	77.0	21,542	1.1
Interstate 280 (Southbound)						
Northern City Limit to SR 35	86,354	76.9	100,450	77.6	14,095	0.7

Source: MIG, 2023 (see Appendix E)

ADT is total average daily traffic volume. Volumes are bidirectional for all roadways except I-280.

CNEL is estimated 50 feet from the road center except for SR 92 and I-280, which are estimated 100 feet from the road center. Italicized text indicates the predicted CNEL value is above the Town's normally acceptable noise exposure level (see Table 4.11-7) for the predominant land use present along the modeled roadway segment. In no case does the net increase in modeled traffic noise exceeds the significance criteria enumerated in Section 4.11.4 and thus represents a potentially significant impact (i.e., the increase in modeled traffic noise is either more than 1 CNEL (where noise exposure is already normally unacceptable), 3 CNEL (where noise exposure is caused to or already exceeds the Town's conditionally acceptable level), or more than 5 CNEL (regardless of whether noise exposure is acceptable or not).

Table 4.11-10: Future (2040) Traffic Noise Levels With and Without The Project

Road / Segment	Year 2040 Without Project		Year 2040 With Project		Net Change	
	ADT[A]	CNEL[B]	ADT[A]	CNEL[B]	ADT[A]	CNEL[B]
Black Mountain Rd						
Wedgewood Dr to Hayne Rd	2,622	51.7	2,895	52.1	273	0.4
Hayne Rd/West Santa Inez Ave to West Santa Inez Ave	3,957	53.1	4,002	53.1	45	0.0
Chateau Dr						
Ralston Ave to Provident Dr	3,119	51.6	3,471	52.1	352	0.5
Provident Dr to Skyline Blvd (City Limit)	2,646	53.3	2,939	53.8	293	0.5
Crystal Springs Rd						
Polhemus Rd (City Limit) to Woodridge Rd	3,193	57.4	3,214	57.5	20	0.0

Table 4.11-10: Future (2040) Traffic Noise Levels With and Without The Project						
	Year 2040 Without Project		Year 2040 With Project		Net Change	
Road / Segment	ADT[A]	CNEL[B]	ADT[A]	CNEL[B]	ADT[A]	CNEL[B]
Woodridge Rd to Ridgeway Rd	4,925	61.8	5,113	62.0	188	0.2
Ridgeway Rd to Alameda De Las Pulgas	8,714	57.3	9,161	57.5	447	0.2
Alameda De Las Pulgas to Harvard Rd	3,475	51.6	3,555	51.7	80	0.1
Harvard Rd to 3rd Ave	3,475	51.6	3,555	51.7	80	0.1
3rd Ave to El Camino Real	1,884	48.3	1,903	48.3	19	0.0
El Cerrito Ave						
Brentwood Rd to Crystal Springs Rd	5,515	59.4	5,874	59.6	359	0.3
Floribunda Ave						
El Camino Real (City Limit) to Sharon Ave / Hillsborough Blvd	4,091	54.1	4,370	54.4	279	0.3
Sharon Ave/Hillsborough Blvd to Eucalyptus Ave	1,304	48.9	1,428	49.3	124	0.4
Forest View Ave						
Eucalyptus Ave to Sharon Ave	2,202	51.4	2,457	51.9	255	0.5
Sharon Ave to El Camino Real (City Limit)	2,604	52.0	2,886	52.5	282	0.4
Hayne Rd						
Skyline Blvd (City Limit) to Mosely Rd	11,166	62.3	11,457	62.4	291	0.1
Mosely Rd to Sandra Rd	8,680	56.3	8,736	56.3	57	0.0
Sandra Rd to Black Mountain Rd	3,957	53.1	4,002	53.1	45	0.0
Hillsborough Blvd						
Sharon Ave / Floribunda Ave to Ralston Ave	1,745	47.9	1,761	47.9	17	0.0
Ralston Ave to Barroilhet Ave	1,660	48.9	1,669	48.9	9	0.0
Barroilhet Ave to Bromfield Rd	1,731	48.9	1,751	49.0	20	0.1
Bromfield Rd to Edgewood Rd	110	38.6	127	39.2	18	0.6
Ralston Ave						
El Camino Real (City Limit) to Crescent Ave	3,191	53.2	3,242	53.3	51	0.1
Crescent Ave to Occidental Ave	5,665	54.9	5,713	55.0	47	0.0
Occidental Ave to Hillsborough Blvd	928	46.1	1,047	46.6	119	0.5

Table 4.11-10: Future (2040) Traffic Noise Levels With and Without The Project

Road / Segment	Year 2040 Without Project		Year 2040 With Project		Net Change	
	ADT[A]	CNEL[B]	ADT[A]	CNEL[B]	ADT[A]	CNEL[B]
Hillsborough Blvd to Eucalyptus Ave	844	47.0	955	47.6	111	0.5
Eucalyptus to Chateau	3,119	52.5	3,471	53.0	352	0.5
Sharon Ave						
Forest View Ave to Floribunda Ave / Hillsborough Blvd	2,493	49.0	2,739	49.4	246	0.4
Summit Dr						
Skyline Blvd to Bella Vista Dr	3,951	53.1	4,312	53.5	361	0.4
Bella Vista Dr to Oakdale Rd	3,086	51.5	3,233	51.7	147	0.2
Tartan Trail						
Black Mountain Rd to Crystal Springs Rd	1,732	50.8	1,899	51.2	167	0.4
Tournament Dr						
Sugar Hill Dr to Tobin Clark Dr	366	42.4	441	43.2	75	0.8
West Santa Inez Ave						
Hillsborough Blvd to Roblar Ave	4,177	53.0	4,257	53.1	80	0.1
Roblar Ave to El Camino Real	3,323	54.9	3,224	54.7	-99	-0.1
State Route 35 (Skyline Boulevard)						
Hayne Road to La Strada Ct (City Limit)	1,980	56.5	2,075	56.7	95	0.2
State Route 82 (El Camino Real)						
Forest View Ave to Ralston Ave	15,215	63.3	15,224	63.4	8	0.0
State Route 92						
Alameda De Las Pulgas to De Anza Blvd	34,145	70.1	34,130	70.1	-15	0.0
Interstate 280 (Northbound)						
Northern City Limit to SR 35	95,905	77.0	96,020	77.0	115	0.0
Interstate 280 (Southbound)						
Northern City Limit to SR 35	100,369	77.6	100,450	77.6	81	0.0

Source: MIG, 2023 (see Appendix E)

ADT is total average daily traffic volume. Volumes are bidirectional for all roadways except I-280.

CNEL is estimated 50 feet from the road center except for SR 92 and I-280, which are estimated 100 feet from the road center. Italicized text indicates the predicted CNEL value is above the Town's normally acceptable noise exposure level (see Table 4.11-7) for the predominant land use present along the modeled roadway segment. In no case does the net increase in modeled traffic noise

Table 4.11-10: Future (2040) Traffic Noise Levels With and Without The Project						
	Year 2040 Without Project		Year 2040 With Project		Net Change	
Road / Segment	ADT[A]	CNEL[B]	ADT[A]	CNEL[B]	ADT[A]	CNEL[B]
exceeds the significance criteria enumerated in Section 4.11.4 and thus represents a potentially significant impact (i.e., the increase in modeled traffic noise is either more than 1 CNEL (where noise exposure is already normally unacceptable), 3 CNEL (where noise exposure is caused to or already exceeds the Town's conditionally acceptable level), or more than 5 CNEL (regardless of whether noise exposure is acceptable or not).						

The results of the traffic noise modeling indicate that future traffic noise levels within the Planning Area will remain low, less than the Town's normally acceptable noise exposure levels for single- and multi-family residential land uses of 60 CNEL and 65 CNEL (see Table 4.11-10), respectively, for most modeled roadway segments. Future modeled traffic noise levels continue to be highest along Crystal Springs Road, El Camino Real (SR 82), Hayne Road, SR 92 and I-280. Specifically, the modeling shows:

- Crystal Springs Road: Modeled traffic noise levels between Woodridge Road and Ridgeway Road are 61.0 CNEL (2020) and 61.8 CNEL (2040 without the Project) at 50 feet from the center of the road. Under both conditions, vacant land and single-family residences are the predominant land uses along this segment of Crystal Springs Road. The Project (in 2040) could increase noise levels on this segment of Crystal Springs Road to 62.0 CNEL, an increase of 1.0 dBA above 2020 conditions and 0.2 dBA above 2040 conditions without the Project. The modeled traffic noise levels with the Project (62.0 CNEL) would exceed the Town's normally acceptable noise exposure level for single-family residential land uses (60 CNEL, see Table 4.11-7**)**; however, the Project would not increase noise levels by 3 dBA or more and, therefore, would not result in a significant Project or cumulative-level change in traffic noise levels along Crystal Springs Road. The modeled traffic noise levels with the Project would not exceed the Town's normally acceptable noise exposure level for multi-family residential land uses of 65 CNEL.
- El Camino Real (SR 82): Modeled traffic noise levels between Forest View Avenue and Ralston Avenue are 61.6 CNEL (2020) and 63.3 CNEL (2040 without the Project) at 50 feet from the center of the road. Under both conditions, single-family residences are the predominant land uses along this segment of El Camino Real, although a multi-family opportunity site is identified near Town Hall, in the vicinity of El Camino Real. The Project (in 2040) could increase noise levels on this segment of El Camino Real to 63.4 CNEL, an increase of 1.8 dBA above 2020 conditions and 0.1 dBA above 2040 conditions without the Project. The modeled traffic noise levels with the Project (63.4 CNEL) would exceed the Town's normally acceptable noise exposure level for single-family residential land uses (60 CNEL, see Table 4.11-7); however, the Project would not increase noise levels by 3 dBA or more and, therefore, would not result in a significant Project or cumulative-level change in traffic noise levels along El Camino Real. The modeled traffic noise levels with the Project would not exceed the Town's normally acceptable noise exposure level for multi-family residential land uses of 65 CNEL.
- Hayne Road: Modeled traffic noise levels between Town's western limit and Moseley Road are 61.9 CNEL (2020) and 62.3 CNEL (2040 without the Project) at 50 feet from

the center of the road. Under both conditions, single-family residences are the predominant land uses along this segment of Hayne Road. The Project (in 2040) could increase noise levels on this segment of El Camino Real to 62.4 CNEL, an increase of 0.5 dBA above 2020 conditions and 0.1 dBA above 2040 conditions without the Project. The modeled traffic noise levels with the Project (62.4 CNEL) would exceed the Town's normally acceptable noise exposure level for single-family residential land uses (60 CNEL, see Table 4.11-7; however, the Project would not increase noise levels by 3 dBA or more and, therefore, would not result in a significant Project or cumulative-level change in traffic noise levels on Hayne Road. The modeled traffic noise levels with the Project would not exceed the Town's normally acceptable noise exposure level for multi-family residential land uses of 65 CNEL.

- SR 92: Modeled traffic noise levels on SR 92 in the vicinity of the Town are 69.3 CNEL (2020) and 70.1 CNEL (2040 without the Project) at 50 feet from the center of the road. Under both conditions, single-family residences are the closest land uses within the Town to SR92, although subdivision/lot split and multi-family opportunity sites within approximately 0.5 miles of SR 92 are identified for future development by the Project. The Project (in 2040) could increase noise levels on SR 92 to 70.1 CNEL, an increase of 0.8 dBA above 2020 conditions and no change from 2040 conditions without the Project. The modeled traffic noise levels with the Project (70.1 CNEL) would exceed the Town's conditionally acceptable noise exposure level for single- and multi-family residential land uses (70 CNEL, see Table 4.11-7**;** however, the Project would not increase noise levels by 1 dBA or more and, therefore, would not result in a significant Project or cumulative-level change in traffic noise levels on SR 92.
- I-280: Modeled traffic noise levels on I-280 in the vicinity of the Town range from 75.9 CNEL (northbound 2020) to 76.9 CNEL (southbound 2020) and from 77.0 CNEL (northbound 2040 without the Project) to 77.6 CNEL (southbound 2040 without the Project) at 100 feet from the center of the road. Under both conditions, single-family residences, education facilities, and recreation lands are the land uses within the Town generally located along the I-280 corridor, although the Nueva School multi-family opportunity site within approximately 200 feet of I-280 is identified for future development by the Project.

  The Project (in 2040) could increase noise levels on I-280 to between 77.0 CNEL (northbound) and 77.6 CNEL (southbound) 70.1 CNEL, an increase of up to 1.1 dBA above 2020 conditions and no change from 2040 conditions without the Project. The modeled traffic noise levels with the Project (77.0 CNEL to 77.6 CNEL) would exceed the Town's normally unacceptable noise exposure level for single- and multi-family residential land uses (75 CNEL, see Table 4.11-7); however, the Project's contribution to I-280 traffic volumes is estimated to be 115 trips (out of approximately 74,500 existing 2020 trips and 95,900 trips in 2040 without the Project). The Project, therefore, would not cause a significant Project-level change or result in a cumulatively considerable contribution to I-280 traffic volumes or I-280 modeled traffic noise levels. Since the Project would not cause nor cumulatively contribute to an increase in noise levels by 1 dBA or more, it would not result in a significant Project or cumulative-level change in traffic noise levels on I-280.

The General Plan Noise Element (Goal N-1) establishes the Town's intent to minimize noise levels within neighborhoods. The Noise Element identifies vehicle traffic as a primary contributor to the Town's noise environment and, therefore, includes policies that emphasize the reduction of transportation-related noise impacts on residential and other sensitive land uses. For example, Policy N-1.2 requires the Town to regulate noise minimize impacts, and Action N-1.3 identifies that the Hillsborough Police Department will enforce the California Vehicle Code pertaining to noise standards for cars, trucks, and motorcycles. New development projects would need to meet acceptable or conditionally acceptable noise levels established by the General Plan for residential land uses (see Table 4.11-7**)**.

As discussed above, traffic noise levels with the proposed Project would continue to be low in the Town on most roadway segments, and the proposed Project would not contribute to a significant increase in modeled traffic noise levels on any key collector, arterial, or highway segment. In addition, the continued implementation of the General Plan would serve to further minimize potential increase in traffic noise levels in the Town. This impact would be ***less than significant***.

Increases in Stationary and Other Sources of Noise

Stationary and other sources of noise in the Planning Area include, but are not limited to, landscape and building maintenance activities, stationary mechanical equipment (e.g., pumps, generators, heating, ventilation, and air conditioning, or HVAC, equipment), garbage collection activities, and other area sources such as people's voices, amplified music, and public address systems. The Project would have the potential to support a change in the existing number and density of residential land uses in the Town that could result in an increase in stationary and other on-site noise levels. The new housing developments would involve similar noise generating sources and activities as the Town's existing housing developments; however, the amount of mechanical equipment, the frequency of landscaping and garbage collection activities, and the intensity of parking and other activities could increase due the addition of ADU's to existing housing sites and the development of new vacant, subdivision/lot split, and multi-family opportunity sites.

Although the Project could increase the amount of noise sources and noise-generating activities compared to existing conditions, it would have a limited potential to generate significant on-site noise levels that could impact existing and/or future noise-sensitive land uses for several reasons. In general, residential land uses are not a substantial noise-generating land use type because they do not include substantial outdoor mechanical equipment, do not involve substantial noise-generating activities during the nighttime, and usually screen or enclose amenities such as pools, workshops, etc.

In addition, the Town's General Plan and Municipal Code provides protection from excessive, unnecessary, and unreasonable noises and includes requirements to ensure that new land uses do not create noise levels that impact the peace, health, safety, and welfare of the Town's residents. Specifically, General Plan Policy N-1.2, Policy N-1.3, and Action N-12 limit and enforce regulations pertaining to excessive community noise levels generated by public and private activities, while the Municipal Code regulates the time and manner in which noise from discretionary, residential noise sources such as power equipment (e.g., saws, compressors, generators) and gas and electric gardening equipment may be generated. Specifically,

Municipal Code Section 8.32.040 limits noise from discretionary, residential noises sources to daytime hours only on Monday to Saturday and requires such noise sources to meet Town's property plane standards of 100 dBA Monday to Friday and 70 dBA on Saturday, which are applied 25 feet outside the property line from which the discretionary noise emanates from.

These policies and programs would protect existing and future residents from excessive noise levels by ensuring new development projects meet Town noise standards through appropriate, project-specific evaluation and design considerations. Thus, stationary and other sources of noise would be controlled by the General Plan goals and policies, and the Municipal Code, which limits allowable noise levels at adjacent properties. For these reasons, the Project would not expose existing or future noise sensitive land uses to substantial permanent increases in stationary and other on-site noise levels. This impact would be ***less than significant***.

Other Planning Considerations (Potential Effects of the Environment on the Project)

The California Supreme Court in *California Building Industry Association v. Bay Area Air Quality Management District*, 62 Cal.4th 369 (2015) ruled that CEQA review is focused on a project's impact on the environment "and not the environment's impact on the project." Pursuant to this ruling, a Lead Agency is not required to analyze how existing conditions might impact a project's existing or future population except where specifically required by CEQA; however, a Lead Agency may elect to disclose information relevant to a project even if it is not considered an impact under CEQA. Furthermore, the Town's General Plan Noise Element sets noise and land use compatibility standards for new land use projects which require evaluation for consistency and compliance even if such evaluation is not required by CEQA to be identified as a physical impact of a project. Accordingly, this section discusses the Town's noise environment (as described in Section 4.11.2) and the degree to which the Town's noise environment is compatible with the development of Housing Opportunity Sites and consistent with City goals, policies, and standards for new land use projects.

As explained in Section 4.11.3 and shown in Table 4.11-7, the General Plan Noise Element establishes land use compatibility standards to guide land use decisions and determine if new development is compatible with the noise environment. The existing ambient noise levels near Housing Opportunity Site vary depending on location, but as Table 4.11-2 and Table 4.11-3, 24-hour CNEL and short-term daytime noise levels were generally less than 60 dBA throughout the Town; in only one location (ST-2, at Town Hall near El Camino Real) did average noise levels exceed 60 dBA.

In addition, as shown in Table 4.11-4, existing 2020 and future 2040 without Project traffic noise levels are generally within the Town's normally acceptable noise levels of 60 CNEL and 65 CNEL for single- and multi-family residential land uses, respectively. The exceptions to this were segments of Crystal Springs Road (61.0 CNEL to 63.3 CNEL between Woodridge Road and Ridgeway Road), El Camino Real (SR 82; 61.6 CNEL to (61.2 DNL from Forest View Avenue to Ralston Avenue), Hayne Road (61.9 CNEL to 62.3 CNEL between Skyline Boulevard (SR 35) and Moseley Road), SR 92 (69.3 CNEL to 70.1 CNEL in the vicinity of the Town), and I-280 (75.9 CNEL to 77.6 CNEL in the vicinity of the Town).

As discussed above, the Town's General Plan (Goal N-1) establishes the Town's intent to minimize noise levels within neighborhoods. In addition, Policy N-1.1 specifically requires the

Town to encourage new development in noise impacted areas to provide effective noise insulation measures. New housing projects would need to meet normally or conditionally acceptable exterior noise levels established by the General Plan (see Table 4.11-7**)**, as well as the 45 CNEL interior noise standard for habitable rooms establishes by the California Building Standards Code (see Section 4.11.3).

Typically, new construction can provide at least between 10 dBA to 15 dBA of exterior-to-interior noise reduction with windows open and between 20 dBA to 25 dBA of exterior-to-interior noise reduction with windows closed. Therefore, exterior noise levels at Housing Opportunity Site property lines between 55 CNEL to 60 CNEL (with windows open) and between 65 CNEL to 70 CNEL (with windows closed) may require the incorporation of specific site design (e.g., setbacks), noise control (e.g., barriers or berms to block noise), and/or building attenuation measures (e.g., specific exterior wall assemblies, windows and doors that block sound transmission, etc.) to ensure outdoor and interior noise levels meet applicable standards.

The actual level of exterior noise and exterior to interior noise attenuation required for each individual Housing Opportunity Site project would depend on factors such as the distance from major noise sources, updated traffic noise modeling results or ambient noise measurements that capture actual development patterns over time, and the presence of any intervening shielding or other attenuating factors that may reduce noise levels in specific parts of developed housing sites.

As discussed above, noise levels throughout the Town are generally low; however, the Project includes Housing Opportunity Sites in the vicinity of El Camino Real and I-280 that could be exposed to traffic noise levels above normally acceptable and normally unacceptable levels, respectively, depending on the site's final distance from the modeled road center and the final design of the project. The General Plan establishes the Town's intent to provide protection from excessive noise levels and ensure that the existing noise environment is compatible with proposed housing projects. It also includes policies and programs to protect existing and future residents from excessive noise levels by ensuring new development projects meet Town noise standards through appropriate, project-specific evaluation and design considerations. For these reasons, the Project would not expose existing or future noise sensitive land uses to unacceptable environmental noise levels. This impact would be ***less than significant***.

Impact NOI-2 – Generation of Groundborne Vibration and Noise. *[Threshold of Significance (b)]*

The development of future Housing Opportunity Sites could result in temporary and permanent sources of groundborne vibration. These impacts are evaluated below.

Temporary Construction Vibration Levels

Construction activities have the potential to result in varying degrees of temporary ground vibration, depending on the specific construction equipment used and activities involved. Vibration generated by construction equipment spreads through the ground and diminishes with increases in distance. The effects of ground vibration may be imperceptible at the lowest levels, result in low rumbling sounds and detectable vibrations at moderate levels, and at high levels can cause sleep disturbance in places where people normally sleep or annoyance in buildings

that are primarily used for daytime functions and sleeping (e.g., a hospital). Ground vibration can also potentially damage the foundations and exteriors of existing structures even if it does not result in a negative human response. Pile drivers and other pieces of high-impact construction equipment are generally the primary cause of construction-related vibration impacts. The use of such equipment is generally limited to sites where there are extensive layers of very hard materials (e.g., compacted soils, bedrock) that must be loosened or penetrated to achieve grading and foundation design requirements. The need for such methods is usually determined through site-specific geotechnical investigations that identify the subsurface materials within the grading envelope, along with foundation design recommendations and the construction methods needed to safely develop a site.

Construction equipment and activities are categorized by the nature of the vibration they produce. Equipment or activities typical of continuous vibration sources include excavation equipment, static compaction equipment, vibratory pile drivers, and pile-extraction equipment. Equipment or activities typical of transient sources (single-impact) or low-rate, repeated impact vibration include impact pile drivers, and crack-and-seat equipment. Pile driving and blasting activities produce the highest levels of ground vibration and can result in structural damage to existing buildings.

Since individual project-specific information is not available at this time, potential short-term construction-related vibration impacts can only be evaluated based on the typical construction activities associated with residential development. Potential construction source vibration levels were developed based on methodologies, reference noise levels, and typical equipment usage and other operating factors documented and contained in the FTA's Transit Noise and Vibration Impact Assessment document (FTA 2018) and Caltrans' Transportation and Construction Vibration Guidance Manual (Caltrans 2020). Reference levels are vibration emissions for specific equipment or activity types that are well-documented and for which their usage is common practice in the field of acoustics.

The need for blasting for future residential development facilitated by the proposed Project is not anticipated. Standard construction equipment (e.g., bulldozers, trucks, jackhammers) generally does not cause vibration that could cause structural or cosmetic damage but may be felt by nearby receptors. Table 4.11-11 presents the typical vibration levels that could be generated by the equipment that is most likely to be used in future development activities in the Planning Area.

Table 4.11-11: Ground-borne Vibration from Typical Construction Equipment

Equipment	Peak Particle Velocity (in/sec) [A]					
	25 feet	50 feet	100 feet	200 feet	400 feet	500 feet
Small bulldozer	0.003	0.00	0.00	0.00	0.00	0.00
Jackhammer	0.035	0.02	0.01	0.00	0.00	0.00
Loaded truck	0.076	0.04	0.02	0.01	0.00	0.00
Auger Drill Rig	0.089	0.04	0.02	0.01	0.00	0.00
Large bulldozer	0.089	0.04	0.02	0.01	0.00	0.00
Vibratory Roller	0.210	0.10	0.05	0.02	0.01	0.01

Table 4.11-11: Ground-borne Vibration from Typical Construction Equipment						
	Peak Particle Velocity (in/sec) [(A)]					
Equipment	25 feet	50 feet	100 feet	200 feet	400 feet	500 feet
Impact Pile Driver	0.644	0.30	0.14	0.07	0.03	0.02
Sonic Pile Driver	0.734	0.34	0.16	0.07	0.03	0.03
Sources: Caltrans 2013 and FTA 2018						

As shown in Table 4.11-11, specific vibration levels associated with typical construction equipment are highly dependent on the type of equipment used. For structural damage, the use of typical equipment during construction activities (e.g., bulldozer, jack hammer, trucks, etc.) would produce PPV levels up to 0.042 in/sec at 50 feet. These PPV values are well below Caltrans' guidelines standards for potential structural damage for modern residential (0.5 PPV for continuous vibration sources; see Table 4.11-5). Similarly, the use of specific vibration-generating equipment such as a vibratory roller or typical pile driver would not exceed Caltrans' structural damage criteria for modern residential buildings unless impact pile drivers were required to be used within approximately 30 feet of any building, which would be unlikely to occur given that the Town's Municipal Code (Chapter 17.24) establishes minimum interior and street line setbacks of 20 to 30 feet (interior) and 25 to 30 feet (street), depending on the improved property's residential building size.

For human annoyance and interference responses, the use of typical equipment (e.g., bulldozer, jack hammer, trucks, etc.) during construction could produce vibration levels that exceed Caltrans' barely perceptible vibration detection threshold for continuous sources (0.01 PPV, see Table 4.11-6), at distances up to approximately 150 feet from work areas. For specific vibration-generating equipment such as a vibratory roller or pile driver, vibrations could be perceptible at greater distances (generally up to approximately 275 feet from work areas); the use of impact hammers would have the potential to produce groundborne vibrations that may be barely perceptible at distances of approximately 400 feet from work areas. Similarly, the use of specific vibration-generating equipment such as a vibratory roller or typical pile driver would not exceed Caltrans' criteria for severe annoyance (0.4 PPV, see Table 4.11-6**)** unless pile drivers were required to be used within approximately 50 feet of any building, which would be unlikely to occur due to setback requirements and the fact that most residential development does not require the use of pile driving equipment.

The above vibration estimates represent potential vibration levels based on typical equipment operations and assume there is no change in elevation between work areas and receptor locations and no change in subsurface conditions that may affect vibration transmission through soil media and structures. In actuality, most development sites in Hillsborough will have slight differences in elevations between work areas and adjacent receptors due to the Town's topography.

Neither the General Plan nor the Municipal Code include specific provisions to address temporary construction vibration levels; however, as described under Impact NOI-1, the General Plan and Municipal code provides protection from excessive noise levels, including construction noise, and includes policies that emphasize the reduction of noise impacts on residential and other sensitive land uses. Many of these policies would also serve to reduce potential

construction vibration effects. For example, Policy N-1.3 requires new development projects to minimize construction noise, while the Municipal Code (Section 8.32.040) limits the time when construction activities can occur to daytime hours only, Monday to Saturday, when people are generally less sensitive to groundborne vibrations.

Although neither the General Plan nor the Municipal Code establish specific vibration standards for construction activities, the above analysis demonstrates the future development of potential housing sites is not anticipated to have the potential to result in structural damage to buildings. With regards to annoyance, although typical construction activities may generate perceptible groundborne vibration levels at structures within approximately 150 feet of work areas, these levels would not be excessive because they would be intermittent (would not occur every day), limited in duration (equipment would move throughout work areas and not operate in the same location for a prolonged amount of time), and occur during the daytime only (when receptors would not be sleeping and, therefore, are considered less sensitive to vibration levels). For these reasons, the proposed Project would not result in a substantial temporary increase in groundborne vibration or noise levels. This impact would be ***less than significant***.

Long-Term Ground-borne Vibration Levels

The proposed Project could facilitate the construction of single- and multi-family residential dwelling units throughout the Town, which would not result in the development of new stationary or mobile sources that could generate excessive groundborne vibration or noise levels. ***No impact*** would occur.

Impact NOI-3 – Exposure to Airport-related Noise Levels. *[Threshold of Significance (c)]*

As described in Section 4.11.2, the Town boundary is generally located within approximately two to five miles of SFO and San Carlos Airport. Although no part of the Town is located within an airport noise impact zone, parts of the Town are located within SFO Airport Influence Area B and San Carlos Airport Influence Area A, and real estate transactions occurring in the Town are subject to disclosures that notify purchasers the subject property is in proximity of an airport. Monitoring of SFO noise levels have indicated airport noise levels in Hillsborough are less than 47 dBA CNEL, which is not excessive. Pursuant to General Plan Policy N-2.1, Policy N-2.2, Action N-2.1 and Action N-2.2, the Town will continue to advocate for SFO noise reduction efforts, participate in regional airport planning efforts, and cooperate with C/CAG ALUP review and real estate notification requirements. For these reasons, the proposed Project would not expose people residing or working in the Town to excessive airport-related noise levels. Therefore, there would be ***no impact***.

4.11.6 References

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U.S. Federal Transit Administration (FTA). 2018. Transit Noise and Vibration Impact Assessment Manual. FTA Report No. 0123. Prepared by John A. Volpe National Transportation Systems Center. Washington, DC. September 2018.

4.12 Population and Housing

4.12.1 Environmental Setting

As discussed in Chapter 3 Project Description, the Planning Area is approximately 6.1 square miles in size and predominantly residential in its land use, accounting for approximately 75 percent of the total land area. Other land uses include public facilities and services (approximately one percent), private schools (approximately one percent), private recreational (approximately three percent), open space and conservation (approximately seven percent), and roadways and other rights of way (approximately 13 percent).

The following sections describe the existing population and housing characteristics within the Town. Unless otherwise noted, the majority of existing conditions information included below is taken from the proposed Housing Element Update.

Hillsborough does not contain any SB 535-designated disadvantaged communities as defined by Government Code § 65302(h).

Population

Between 2010 and 2020, the population of Hillsborough grew approximately six percent, from 10,825 to 11,442 residents. This was a slower growth rate than the County of San Mateo, which experienced a 7.6 percent increase from 2010 to 2020. ABAG growth forecasts project a decrease in Town population growth through 2030 (from 5.7 percent for the 2010-2020 period to 1.5 percent for the 2020-2030 period). From 2020 to 2030, ABAG estimates that the Town's population will still grow at a slower rate than the countywide population (1.5 percent growth for Hillsborough compared to a countywide population growth rate of 10.3 percent). However, between 2030 and 2040, while the growth rate of the Town's population is forecast at a faster rate (2.1 percent) than for the 2020-2030 period, the countywide population is forecast at a slower rate (7.4 percent) than for the previous 2020-2030 period. Table 4.12-1 shows expected population growth within Hillsborough and San Mateo County. The demographics and racial profile of the Town is indicated in Table 4.12-2.

Table 4.12-1: Population and Projected Growth

Area	2010	2020	2030	2040	2010-2020 Change	2020-2030 Projected Change	2030-2040 Projected Change
Hillsborough	10,825	11,442	11,610	11,850	5.7%	1.5%	2.1%
San Mateo County	718,451	773,244	853,260	916,590	7.6%	10.3%	7.4%

Source: CA Department of Finance E-5 Population and Housing Estimates, ABAG Growth Forecasts (Plan Bay Area 2040).

Table 4.12-2: Demographics and Racial Profile of the Town	
Demographic Profile	**2021**
Age	
0-19	3,311 (29%)
20-44	2,171 (19%)
45-64	3,762 (33%)
65+	2,146 (19%)
Median Age	46.3
Race/Ethnicity	
White (non-Hispanic)	6,264 (55%)
Hispanic	435 (4%)
Black	28 (0%)
Asian/Pacific Islander	3,648 (32%)
Other	1,015 (9%)
Source: U.S. Census Bureau, American Community Survey 5-Year Estimates Subject Tables; 5-Year Estimates Data Profiles, 2021.	

Housing

In 2020, the State of California Department of Finance reported 4,091 housing units in Hillsborough. According to the Town, between 2010 and 2020 the local housing stock has increased by 179 units. Almost all of the Town's housing stock is made up of single-family attached and detached homes (99.3 percent) with the remaining 0.7 percent consisting of multi-family units (two to four units). The vacancy rate for owner-occupied housing was six percent from 2015- 2019, and for renter-occupied housing, 0 percent.

The average home price in Hillsborough was estimated at $4,571,825 in December 2020 (as reported in the Draft Housing Element and based on data from Zillow), with 95 percent of the housing stock valued at more than $2,000,000. In contrast, the average home value in San Mateo County was estimated at $1,418,334.

Most of Hillsborough households are owner-occupied (3,389, or 93 percent in 2019), with 244 units renter-occupied (7 percent). The largest portion of rental units in Hillsborough cost $3,000 or more per month (as of 2022) and comprise 42 percent of rental units. Rental units costing between $2,500 to 3,000 per month made up 23 percent of rental units. For San Mateo County, 22 percent of rental units cost $3,000 or more per month.

Employment

As described in the Housing Element Update, residents in Hillsborough are primarily employed in the financial and professional services sector (44 percent), with health and educational services the next biggest sector (25 percent). The median household income in Hillsborough (2017-2021) was over $250,000; for San Mateo County overall, the median household income

for the same period was $136,837. According to the U.S. Census, between 2002 and 2018, the number of jobs in Hillsborough decreased by 13.7 percent. With 4,736 employed residents and 2,135 jobs, Hillsborough is a net exporter of workers.

Jobs-Housing Balance

The jobs-housing balance is an indicator of fiscal, social, and environmental health and can be expressed as a ratio of the number of jobs to the number of households. This shows whether a jurisdiction has a surplus or deficit of jobs compared to its population and housing supply. A jobs-housing balance greater than 1.0 could result in a shortage of affordable housing, with workers unable to reside near their place of employment and therefore having to commute from more distant areas where affordable housing is available. As shown in Table 4.12-3, data from ABAG indicate that the Town of Hillsborough's jobs-housing ratio in 2010 was 0.57 (which means that the Town had 0.57 jobs for every household). By 2040, the Town will have an estimated 2,265 jobs and 3,910 households. Using this data, the Town's projected 2040 jobs-housing ratio would be 0.58 jobs for every household (3,910 jobs divided by 2,265 households). Countywide jobs-housing statistics are also included for comparison. The projected 2040 jobs-housing ratio of 0.58 for the Town would imply that the Town would have more housing opportunities relative to jobs and fewer workers would be pursuing housing opportunities. In contrast, for the County overall, in 2040 the reverse would be the case, with more jobs available than housing, which could indicate a shortage of housing as more workers would be pursuing housing opportunities.

Table 4.12-3: Estimated Housing and Job Growth, 2010-2040 – Town of Hillsborough and San Mateo County

	2010	2020	2030	2040
Housing Units				
Hillsborough	3,695	3,895	3,925	3,910
San Mateo County	257,835	284,260	302,520	319,965
Jobs				
Hillsborough	2,120	2,210	2,225	2,265
San Mateo County	343,335	399,275	423,005	472,045
Jobs-to-Housing Ratio				
Hillsborough	0.57	0.57	0.57	0.58
San Mateo County	1.33	1.40	1.40	1.48
Source: ABAG Growth Forecasts (Plan Bay Area 2040).				

4.12.2 Regulatory Setting

Federal

U.S. Department of Housing and Urban Development (HUD)

HUD oversees the Federal Housing Administration (FHA), the largest mortgage insurer in the world; regulates housing industry business; and provides Project-Based Rental Assistance and other rental assistance programs supporting low and very-low-income households.

State

Housing Element Law (California Government Code Article 10.6).

The State has established detailed legal requirements for a General Plan Update (GPU) Housing Element. State law requires each city and county to prepare and maintain a current housing element as part of the community's General Plan in order to attain a statewide goal of providing “decent housing and a suitable living environment for every California family.” (Government Code Section 65580(a)). Under state law, housing elements must be updated every eight years and reviewed by the State Department of Housing and Community Development. Under State law, Housing Elements generally must be updated every five years and reviewed by HCD.

California Department of Housing and Community Development (HCD)

HCD enforces standards for housing construction, maintenance of farmworker housing, and manufactured/factory-built homes. HCD also proposes amendments to California's residential building standards for new construction to the California Building Standards Commission and helps train local government to better understand new requirements. HCD works with regional governments to determine their housing needs and reviews every city and county's housing element of the general plan to determine compliance with State law. HCD works with regional governments to determine their housing needs and reviews every city and county's housing element of the general plan to determine compliance with State law.

California Housing Accountability Act

The California Housing Accountability Act (Government Code Section 65589.5) enacted in 2017 ensures that local governments may not reject housing development projects (including emergency shelters) that contribute to meeting or exceeding its share of the regional housing need or otherwise make housing projects infeasible.

Housing Density Bonus Law

California Government Code sections 65915 through 65918 provide for an increase in the amount of housing allowed under a given land use designation or zoning ordinance (i.e., a “density bonus”) and other incentives or concessions such as waivers or reductions of development standards in exchange for building affordable housing or donating land for the building of affordable housing, including senior housing.

AB 686 (Affirmatively Furthering Fair Housing)

Assembly Bill 686 (Government Code Section 8899.50, 65583(c)(5), 65583(c)(10), and 65583.2(a)) requires public agencies (as defined by the statute) to administer its housing and community development programs and activities in a manner that affirmatively furthers fair housing. In particular, housing elements are required to contain an assessment of fair housing within the jurisdiction and a program that sets forth a schedule of actions to be undertaken by the local jurisdiction during the planning period to implement these policies and achieve housing element goals and objectives. The bill requires an inventory of land suitable and available for development, and an inventory of identified sites that can be developed for housing within the planning period sufficient to provide for the jurisdiction's share of the regional housing need for all income levels.

SB 9 (Housing Development; Approvals)

Senate Bill 9 (Government Code Sections 66452.6, 65852.21, and 66411.7) provides for ministerial approval of a housing development of no more than two units in a single-family zone (duplex) or the subdivision of a parcel zoned for residential use into two parcels (lot split), or both. This law allows for development of up to four housing units where only one would have been permitted without further discretionary review.

Regional

Regional Housing Needs Allocation

Housing Element law requires a quantification of each jurisdiction's share of the regional housing need as established in the plan prepared by the jurisdiction's council of governments. The HCD, in conjunction with ABAG, determines the projected housing need for the Bay Area. This share, known as the Regional Housing Needs Allocation (RHNA), is projected to be 441,176 new housing units for the 2023 – 2031 planning period throughout the ABAG region. ABAG has, in turn, allocated this share among municipalities, distributing to each a RHNA divided into income levels. The Town of Hillsborough has an RHNA of 554 housing units to accommodate in the housing element period. The RHNA allocation distribution is as shown in Table 4.12-4**.**

Table 4.12-4: Town of Hillsborough Regional Housing Needs Allocation

Income Category	Number of Housing Units	Percent of Total Allocation
Very Low (0-50% of County AMI)	155	28%
Low (> 50-80% of County AMI)	89	16%
Moderate (>80-120% of County AMI)	87	16%
Above Moderate (120% of County AMI)	223	40%
Total	**554**	**100%**
Source: Town of Hillsborough, 2023 – 2031 Housing Element; MIG, Inc.		

Plan Bay Area 2050

Plan Bay Area 2050 is a long-range plan for the nine-county San Francisco Bay Area. Plan Bay Area 2050 focuses on four key elements – housing, the economy, transportation, and the environment – and identifies a path to make the Bay Area more equitable for all residents and more resilient in the face of unexpected challenges. With respect to housing, the Plan projects that the Bay Area will need to add more than 441,000 new affordable housing units by 2050 to meet the region's housing needs. The following housing strategies are identified in *Plan Bay Area 2050*:

H1. Further strengthen renter protections beyond State law. Building upon recent tenant protection laws, limit annual rent increases to the rate of inflation, while exempting units less than 10 years old.

H2. Preserve existing affordable housing. Acquire homes currently affordable to low and middle-income residents for preservation as permanently deed-restricted affordable housing.

H3. Allow a greater mix of housing densities and types in Growth Geographies. Allow a variety of housing types at a range of densities to be built in Priority Development Areas, select Transit-Rich Areas and select High-Resource Areas.

H4. Build adequate affordable housing to ensure homes for all. Construct enough deed-restricted affordable homes to fill the existing gap in housing for the unhoused community and to meet the needs of low-income households.

H5. Integrate affordable housing into all major housing projects. Require a baseline of 10-20% of new market-rate housing developments of five units or more to be affordable to low-income households.

H6. Transform aging malls and office parks into neighborhoods. Permit and promote the reuse of shopping malls and office parks with limited commercial viability as neighborhoods with housing for residents at all income levels.

H7. Provide targeted mortgage, rental and small business assistance to Equity Priority Communities. Provide assistance to low-income communities and communities of color to address the legacy of exclusion and predatory lending, while helping to grow locally owned businesses.

H8. Accelerate reuse of public and community-owned land for mixed-income housing and essential services. Help public agencies, community land trusts and other non-profit landowners accelerate the development of mixed-income affordable housing.

Town of Hillsborough General Plan

The currently adopted Land Use Element and Housing Element of the Hillsborough General Plan (2005) contain the following goals, policies, and actions related to housing:

Land Use Element

Goal LU-1 - Provide for the preservation and enhancement of the Town's unique residential character.

Policy LU-1.1 - Maintain the character of the Town's neighborhoods.

Policy LU-1.5 - Review Town regulations, including the Municipal Code and Residential Design Guidelines, on a regular basis to ensure that development within the Town occurs in a manner compatible with the Town's character.

Action LU-1.1 - The Architecture and Design Review Board will apply the Hillsborough Residential Design Guidelines when reviewing new construction and significant remodeling. The goals of the Guidelines include:

- Reinforcing Hillsborough's image
- Facilitating contemporary life
- Encouraging town-wide diversity
- Fostering creativity

Goal LU-2 - Provide for orderly development in a manner compatible with the existing character of Hillsborough.

Policy LU-2.1 - Ensure that regulations, requirements and processing procedures are clear, precise and reflect Town policy.

Policy LU-2.2 - Continue to review new development proposals to ensure that they do not overwhelm their sites or their neighborhood.

Policy LU-2.3 - Continue to minimize land use conflicts within the Town where possible.

Policy LU-2.5 - Continue to require conceptual plans before applications for subdivisions of five lots or greater are submitted to the City Council. The Town's requirements for conceptual plans will be updated to require that during the preparation of a conceptual plan, special attention will be given to opportunities for:

- New recreational facilities, such as parks and trails
- Preservation of sensitive habitat areas in open space
- Multiple access points to the project to minimize the Impacts

Goal LU-5 - Ensure that adequate review is completed prior to selling Town-owned property or purchasing or accepting dedications of land or facilities for residents' benefit or use.

Policy LU-5.2 - Include public involvement as part of the analysis of and planning for proposed dedication of land or facilities to the Town, and the purchase or sale of Town-owned property.

Policy LU-5.3 - Ensure adequate review is completed as to the future need for Town-owned property prior to selling for private use.

Policy LU-5.4 - Balance the potential for immediate income resulting from the sale of Town-owned property with the need to retain property for future public facilities and services.

Housing Element[40]

Goal 1 - Increased housing opportunities in Hillsborough and surrounding communities.

Policy 1-A - Actively participate in meeting the housing needs of the community.

Program 1-A2 - Work with nearby communities to explore subregional housing needs and solutions.

Program 1-A3 - Work with local institutions under Chapter 17.16 of the Zoning Ordinance to consider developing employee housing on existing institutional lands in Hillsborough.

Program 1-A4 - Work with local and nearby districts (including but not limited to the San Mateo County Community College District) to promote and support the development of affordable housing for faculty, staff, and others on existing institutional lands.

Policy 1-B - Facilitate the private development of housing in Hillsborough.

Policy 1-D - Use vacant land on the periphery of Hillsborough to increase housing opportunities.

Program 1-D1 - Consider annexations of land adjacent to Hillsborough that permit housing opportunities.

Goal 2 - Housing consistent with the character of the community.

Policy 2-A - Allow subdivision of existing vacant lots larger than one acre.

Program 2-A1 - Continue to permit subdivision of vacant parcels that are large enough to accommodate two or more half-acre lots, but which cannot meet street frontage or lot width requirements.

Policy 2-B - Promote more housing options while preserving the character of Hillsborough.

Program 2-B1 - Continue to use the density bonus, as provided by Chapter 17.60 of the Hillsborough Municipal Code, to encourage affordable or senior housing or both, as well as affordable housing for families of five or more persons.

Goal 3 - A continuum of housing opportunities for the members of the Hillsborough community in all stages of life with or without disabilities.

Policy 3-A - Support seniors and other special needs populations.

[40] These are the currently adopted Housing Element goals, policies, and program. For the proposed Draft Housing Element goals, policies, and actions, see Appendix B of this EIR.

Program 3-A1 - As required by State law, continue to allow board and care facilities for six or fewer residents.

Program 3-A2 - Continue to ensure that the transitional and supportive housing is allowed as specified in State law.

Program 3-A4 - Continue to allow an emergency shelter at the Town's Civic Center within the former fire station as a permitted use, subject to standards, as required by State law.

Policy 3-C - Encourage both attached and detached second units where currently permitted.

Program 3-C2 - Continue to promote and inform the public about the provisions of Chapter 17.52 of the Zoning Ordinance which allow "second units" to be (1) created within existing homes; (2) created by converting existing detached accessory buildings (freestanding cabanas or pool houses); (3) developed as new detached accessory buildings to existing homes; or (4) developed as part of newly constructed single-family residences—either as detached units or incorporated within the main house.

Goal 4 - Equal housing opportunities for all.

Policy 4-A - Eliminate discrimination in housing based on age, race, color, religion, sex, marital status, national origin, ancestry, or occupation.

Program 4-A2 - Continue to implement Chapter 17.42 of the Zoning Ordinance (Reasonable Accommodation) to expedite retrofit efforts to comply with the Americans with Disabilities Act (ADA), require ADA compliance in all new development that is subject to ADA, and provide flexibility in the development of housing for persons with disabilities.

Town of Hillsborough Municipal Code

Municipal Code Chapter 16.44 establishes procedures and requirements for urban lot splits in accordance with Government Code section 66411.7 (i.e., pertaining to SB 9; see above under "State"). This chapter includes standards related to Subdivision Map Act compliance, zoning, lot location, historic restrictions, prior urban lot splits, protected housing, lot size, easements, lot access, unit standards, fire hazard mitigation measures, and other legal and administrative requirements and restrictions. Municipal Code Chapter 17.54 provides additional zoning requirements for consideration of two-unit projects, also in accordance with Government Code section 66411.7 (and pertaining to SB 9; see above under "State").

Municipal Code Chapter 17.52 establishes standards and procedures for developing accessory dwelling units (ADUs) and JADUs in compliance with California Government Code Sections 65852.2 and 65852.22. This chapter states the approval process and permit requirements, and specifies standards for ADUs related to zoning, planning requirements (maximum size, floor area ratio, lot coverage, minimum open space, height, setbacks, parking, etc.), fire sprinklers, rental and sale restrictions, owner occupancy, deed restrictions, architectural and landscaping requirements, and other legal and administrative requirements and restrictions.

Municipal Code Chapter 17.60 establishes the application and approval process related to density bonuses and/or other concessions or incentives ("density bonus") in compliance with

State law (Government Code Section 65915 et seq.). This chapter includes description of the necessary information required for density bonus applications, the criteria for evaluation of such requests, provisions for periodic monitoring of compliance with required deed restriction, and other legal and administrative requirements.

4.12.3 Thresholds of Significance

Per the CEQA Guidelines, implementation of the proposed Project would have a significant impact related to population and housing if it will:

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.

4.12.4 Impacts and Mitigation Measures

The proposed Project consists of updates to the existing 2014 - 2022 Housing Element to reflect the 6th cycle 2023 – 2031 housing assignments. In addition, associated amendments to the Land Use Element and General Plan Land Use Map, Open Space and Conservation Element, and Public Safety Element; amendments to Title 17 (Zoning) of the Hillsborough Municipal Code, and amendments to the Hillsborough Zoning Map are proposed for consistency of all Town documents, codes, and regulations. These associated amendments are generally described in sections 3.3.9 through 3.3.12 in the Project Description and would not result in environmental impacts related to population and housing. Therefore, they are not discussed further in this chapter. The impact analysis focuses on the residential development that would be facilitated by the Draft 2023 – 2031 Housing Element.

Impact POP-1 – Project Inducement of Substantial Unplanned Population Growth. *[Threshold of Significance (a)]*

Induced population growth may result in impacts if a project induces growth in an area not otherwise planned for growth or in an area that cannot adequately accommodate such growth. Growth may be induced directly by proposals for new residential uses or indirectly by proposals for new roadways, other infrastructure, or employment opportunities.

Implementation of the Project would facilitate the construction of up to 554 units (the assigned RHNA). Based on an average household size of 2.3 persons, as utilized in preparation of the transportation analysis (see Chapter 4.14) and which also took into consideration land use and projected unit types for consistency with County/City Association of Governments (C/CAG) transportation planning models, the Project would result in a population increase of 1,274 residents. It should be noted that due to the nature of the proposed development (e.g., ADUs, subdivisions/lot splits, multi-family units), the average household size is less than the Town-wide persons per household (pph) figure indicated in the Housing Element (3.43 pph).

As described in Chapter 3 Project Description, implementation of the Housing Element Update would generally facilitate residential development in areas that already contain residential

development or otherwise would occur on vacant sites with neighboring development. This development is consistent with Town goals and policies intended to balance increased intensity of use with preservation of established residential neighborhoods. Future residential development facilitated by the Project would be planned in accordance with the Housing Element Update, and therefore would not result in substantial unplanned population growth.

Related utilities improvements would be required in some areas to support new development (e.g., Tobin Clark site), as discussed in Chapter 4.15, and could be considered a potential inducement to growth in adjacent areas. However, considering that (1) the Town is primarily "built out" (i.e., very limited vacant land is available for future development); (2) these utilities improvements would not extend beyond to other areas that are not otherwise currently served; and (3) these improvements would be on a scale sufficient to adequately serve the planned new housing units (and possibly include existing development if appropriate), the proposed Project would not indirectly induce substantial population growth through the extension of infrastructure to new areas. In addition, any roadway improvement activities deemed necessary by the Town would focus on the needs of new housing development facilitated by the Project (such as improving access and/or evacuation routes) and would not open a new area to development through the provision of extended roadways.

Further, the Housing Element Update is intended to accommodate the Town's RHNA share determined by ABAG for the 2023 – 2031 planning period. As such, the population growth associated with the Housing Element Update would not be unplanned as the document includes the identification of sites for future housing development. The population growth would also be consistent with Plan Bay Area 2050, a regional plan intended to guide the regional population growth anticipated by 2050. Therefore, the impact on population growth would be ***less than significant.***

Impact POP-2 – Population and Housing Displacement Effects. *[Threshold of Significance (b)]*

The Draft 2023 – 2031 Housing Element presents five approaches to produce the number of housing sites to meet the RHNA assignment: Approach 1: Accessory Dwelling Units (ADUs); Approach 2: Pipeline Projects; Approach 3: Vacant Opportunity Sites; Approach 4: Subdivision/Lot Split Opportunity Sites; and Approach 5: Multi-Family Opportunity Sites. The housing opportunity sites identified in these five approaches and potential numbers of units are indicated in Table 3.3-2 in Project Description. Approach 2 Pipeline Projects are not being assessed in this EIR because the Town has already undertaken review of those project applications. Approach 1 would result in 400 ADUs spread throughout Town on any eligible residential lot, and Approaches 3 through 5 would result in either single-family units on vacant single-family zoned lots or multi-family units on the newly rezoned multi-family parcels. The primary multi-family parcels include the Town Hall site and the undeveloped (vacant) Tobin Clark site. The Nueva School and the Burlingame Country Club do not currently contain housing units and the development of the proposed multi-family housing at each site would not displace existing housing.

No existing housing would be displaced as a result of implementing the proposed Project. None of the RHNA sites identified in the 2013 – 2032 Draft Housing Element require redevelopment of

an existing residential use. The Town Hall site would require redevelopment, but it does not currently contain housing.

Implementation of the Housing Element Update would result in the net increase of units within the Town and would not result in displacement of population or housing. Therefore, this would be a ***less-than-significant impact***.

4.12.5 References

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U.S. Census Bureau, QuickFacts “San Mateo County, California,” Accessed on September 2, 2023 at: https://www.census.gov/quickfacts/sanmateocountycalifornia.

4.13 Public Services and Recreation

4.13.1 Environmental Setting

Fire Protection

Fire protection services in Hillsborough are provided by the Central County Fire Department (CCFD) (Town of Hillsborough 2005). The CCFD was formed in 2004 as a Joint Powers Authority between the Town of Hillsborough and the City of Burlingame. The CCFD also serves the City of Millbrae via a Contract for Services. The CCFD cooperates with regional fire protection activities to reduce the overall risk of wildfires within the County. The CCFD participates in the Fire Safe San Mateo County group, which includes members from various stakeholders involved in fire protection within the County or responsible for the management of open space areas.

The Town continues the Wildland Urban Interface (WUI) program in partnership with the CCFD to ensure defensible space for its residents. The program involves community education and partnering with residents on a program to harden properties in potential fire risk areas. In FY 2021-22 CCFD implemented the WUI program in the Town. This program is projected to generate gross revenues of $165,000 in FY 2023-24. CCFD will inspect 1,400 parcels in the north zone. Continuing development of new commercial and multi-residential buildings has increased the demand for plan review and new construction inspections. In FY 2023-24 staff will continue to evaluate potential cost recovery strategies related to new development projects.

The CCFD operates six fire stations, in addition to an administrative headquarters and training facility (CCFD 2021). Fire stations located within Hillsborough include Fire Station 32 at 330 Ascot Road and Fire Station 33 at 835 Chateau Drive. CCFD Fire Station 32 houses Engines 32 and 132. CCFD Fire Station 33 houses Engine 33, Urban Search & Rescue unit 133, and a MED CAT armored vehicle. The CCFD's daily staffing consists of six engine companies, one ladder truck, and one battalion chief. CCFD maintains a State of California Type I heavy rescue Urban Search & Rescue unit that is cross-staffed daily in addition to a Type 6 wildland unit. Because CCFD is a Joint Powers Authority between Hillsborough and Burlingame and provides service to Millbrae via a Contract for Services. Two of CCFD's fire stations are located within the Town's borders. CCFD is also a participant in a County automatic aid agreement, which uses the County's dispatch and AVL (automatic vehicle locator) program to identify and dispatch the closest rescue or response vehicle regardless of jurisdiction.

CCFD's Fire Prevention Division is comprised of a Fire Marshal, Deputy Fire Marshal, two fire inspectors, three fire prevention specialists, and a Community Risk and Resiliency Specialist. The Fire Prevention Division manages several significant community risk reduction initiatives including vegetation and hazard abatement programs, plan reviews, comprehensive code enforcement activities, and fire investigations. The Fire Prevention Division also produces and deliver numerous programs throughout the community intended to promote and teach fire safety and emergency preparedness.

Figure 4.13-1 shows the locations of fire stations in Hillsborough. Several locations in southern Hillsborough, including portions of the Lakeview neighborhood and neighborhoods north and northwest of the College of San Mateo, are within the two-mile driving distance fire service area of all fire stations but are not within the one-mile driving distance service area.

The CCFD implements a very active defensible space program within its service area. The CCFD distributes information to homeowners regarding appropriate vegetation management for surrounding outdoor areas and ensures compliance with State codes for vegetation management on private property. In addition, the Department also maintains active participation in wildland fire fighting training.

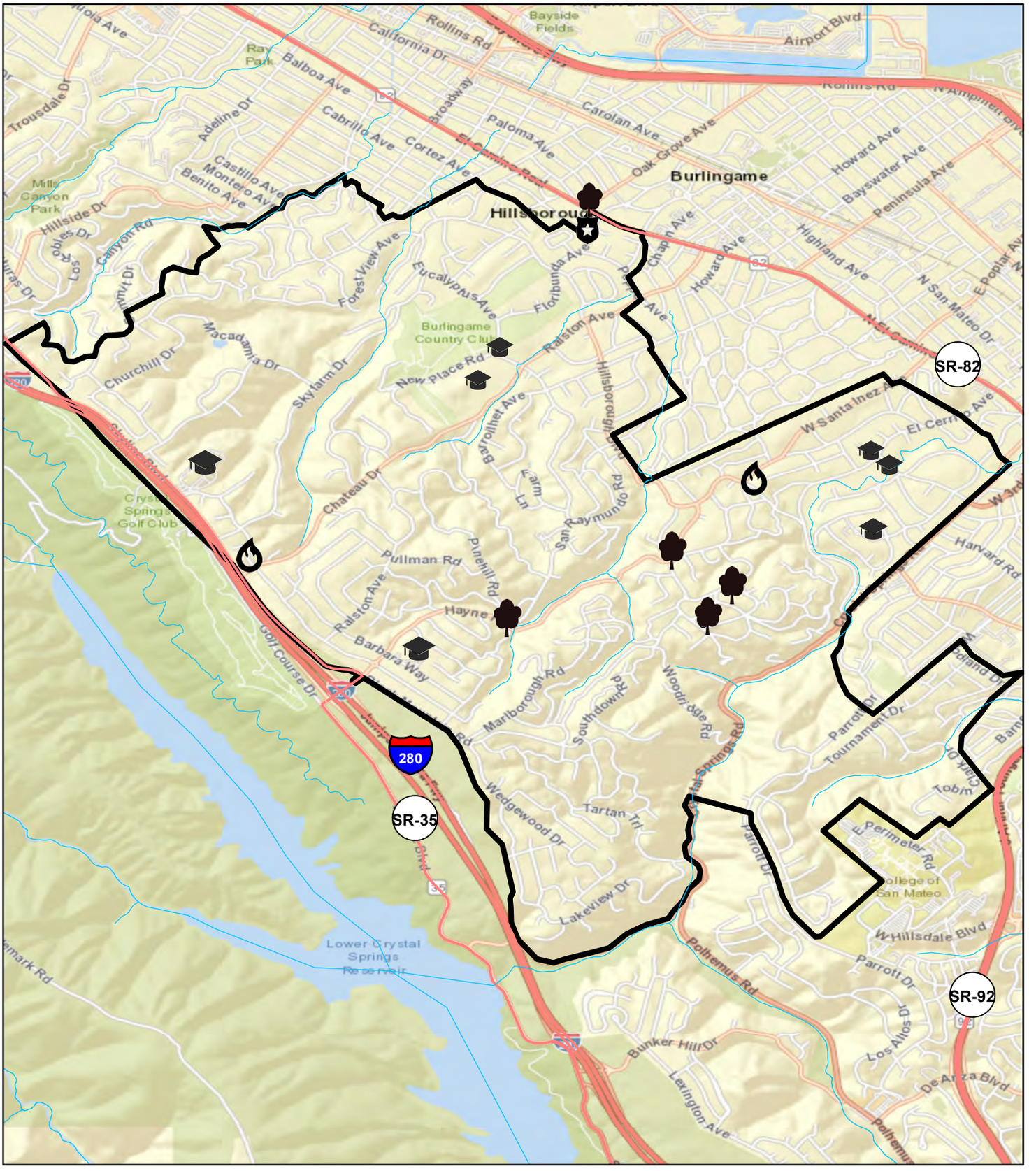
Police Protection

The Hillsborough Police Department provides police protection services to the Town of Hillsborough (Town of Hillsborough 2023). The Hillsborough Police Department is based out of its headquarters at 1600 Floribunda Avenue. The Police Department consists of the Patrol & Operations, Investigations, Traffic Unit, K-9 Unit, Special Weapons & Tactics Team (SWAT), Evidence Technicians, School Resource Officers, Crime Prevention Unit and Support Services Divisions. There are 28 sworn police officers and 10 non-sworn support staff employees within the Hillsborough Police Department. On average, Emergency 9-1-1 officer response times are approximately 3:39 minutes. Non-Emergency response times are approximately 8:06 minutes.

Patrol Officers maintain social order through enforcement of local and state laws. Patrol Officers are also tasked with being timely in their response to calls for service, preliminary investigation of criminal offenses, apprehension of offenders, enforcement of traffic and parking laws, furtherance of crime prevention efforts through interaction with citizens, and a deterrent presence. Patrol and Operations is the largest division of the Hillsborough Police Department. The Patrol and Operations Division includes all specialty assignments within its ranks.

The Investigations Division of the Hillsborough Police Department investigates more serious crimes committed within the community. The division’s primary function is to identify and apprehend criminal offenders. Investigators assigned to the Investigations Division handle a variety of complex in-depth investigations, including but not limited to financial crimes, computer crimes, sexual assaults, burglaries, robberies, narcotics, and homicides. The Investigations Division consists of an Inspector Corporal and two Inspectors. These officers are assigned to the division full time in order to facilitate all investigations that result from any serious or complex criminal cases.

The Hillsborough Police Department utilizes canines that are fully trained in search, apprehension, officer protection, and either narcotics or bomb detection. The use of a strategically deployed K-9 team can save hours of time for police officers because a K-9 team can conduct a search quickly and effectively, resulting in increased officer safety, the apprehension of dangerous suspects, and increased safety to citizens.



Source: Esri 2023

Legend

- Fire Station
- Park
- Police Department
- School

0 0.175 0.35 0.7 1.05 1.4 Miles

N

Figure 4.13-1 Hillsborough Public Services

Town of Hillsborough 6th Cycle Housing Element Update Draft EIR

MIG

The Hillsborough Police Department S.W.A.T. team consists of highly trained officers that are required to be on-call at all times. The S.W.A.T. team specializes in high-risk operations which include arrest team tactics, extraction tactics, less lethal deployment, entry tactics, distraction tactics, counter sniper operations, and dignitary protection.

Hillsborough evidence technician officers are specially trained in photography, evidence collection, latent fingerprint collection, and crime scene processing.

Hillsborough School Resource Officers respond to all school related incidents. They aid with school rallies and speak with groups about cyber bullying and internet safety. Officers meet with the schools, youth groups and sports teams to educate children about law enforcement, bike safety, the dangers of drugs and alcohol and stranger danger.

Hillsborough Crime Prevention Officers present in-person and virtually at community events and Town Hall functions to cover a variety of topics, which include crime rates and trends, ways to help protect your home from becoming a target for burglars, internet safety and identity theft protection. Officers conduct home security checks for residents to help improve the security measures they currently use.

The Hillsborough Police Department's support services consists of a 9-1-1-Communications Center and Code Enforcement Unit. The Communication Center is open 24 hours a day. Dispatchers dispatch emergency and non-emergency calls for police, fire, and medical services. Dispatchers verify warrants, monitor residential alarms, and greet visitors in the police department lobby.

The Hillsborough Code Enforcement Officer works with the police department and building and planning department to help investigate and enforce municipal code violations within the Town.

Figure 4.13-1 shows the location of the Town Sheriff's Office. The Hillsborough Police Department's service area consists of lands within the incorporated Town boundaries.

Public Schools

The Hillsborough City School District provides public elementary and middle school education services for the residents in the Planning Area. The Hillsborough City School District's three elementary schools include North School, South School, and West School, and its middle school is Crocker Middle School. Students within the Planning Area attend high school at one of the San Mateo Union High School District's local public high schools, which include San Mateo, Aragon, Mills, and Burlingame High Schools.

Information about the school districts and schools serving students within the Planning Area is shown in Table 4.13-1. The locations of public schools in the Town are shown in Figure 4.13-1.

Enrollment for Hillsborough City School District and San Matio Union High School District between 2018 and 2023 is included in Table 4.13-2. As shown in Table 4.13-2**,** the Hillsborough City School District experienced declining enrollment from the 2018-2019 through 2021-2022 school years but enrollment increased in the 2022-2023 school year, while the San Mateo Union High School District has experienced declining enrollment over the last four years.

In addition, there are three private schools in Hillsborough, any of which may serve future Town residents: the Bridge School, Crystal Springs Uplands School, and The Nueva School.

Table 4.13-1: School Districts and Schools Serving Residents Within the Planning Area			
District and School	**Grades1**	**2022-2023 Enrollment**	**Total District Enrollment (2022-2023)**
Hillsborough City School District			**1,313**
North School	TK/K-5	272	
South School	TK/K-5	267	
West School	TK/K-5	334	
Crocker School	6-8	440	
San Mateo Union High School District			**8,844**
Aragon High School	9-12	1,738	
Burlingame High School	9-12	1,471	
Capuchino High School	9-12	1,061	
Hillsdale High School	9-12	1,632	
Mills High School	9-12	1,136	
San Mateo High School	9-12	1,612	
Peninsula High School	9-12	194	

Source: Hillsborough City School District, 1980-2023 Actual and 2023-2024 Projected Enrollment Data; San Mateo Union High School District, Department of Student Services, Enrollment Recommendations, February 9, 2023 Board Meeting.

1 "TK" refers to Transitional Kindergarten.

Table 4.13-2: School District Enrollment between 2018-2023						
	District Enrollment (Students)					
School District	**2018-2019**	**2019-2020**	**2020-2021**	**2021-2022**	**2022-2023**	**Difference between 2018-20231**
Hillsborough City School District	1,353	1,303	1,270	1,269	1,313	-40
San Mateo Union High School District	-	9,300	9,210	9,102	8,844	-456

Source: Hillsborough City School District, 1980-2023 Actual and 2023-2024 Projected Enrollment Data; San Mateo Union High School District, Department of Student Services, Enrollment Recommendations, February 9, 2023 Board Meeting.

1 The San Mateo Union High School District Department of Student Services did not provide enrollment data for the 2018-2019 school year. As such, Table 4.13-2 shows a four-year difference enrollment between the years 2019-2023 for the San Mateo Union High School District.

Libraries

While there are no library branches in Hillsborough, the Town pays the Cities of San Mateo and Burlingame monthly for library services (Town of Hillsborough 2005). Burlingame and San

Mateo are members of the Peninsula Library System. Hillsborough residents are able to borrow materials from any of the Peninsula Library System's member library branches. The Peninsula Library System is a Joint Powers of Agreement and is funded primarily by member libraries: Burlingame Public Library, Daly City Public Library, Menlo Park Public Library, Redwood City Public Library, San Bruno Public Library, San Mateo County Libraries, San Mateo Public Library, South San Francisco Public Library, and the San Mateo County Community College District (including the College of San Mateo, Canada College and Skyline College). Hillsborough residents mainly use the neighboring libraries in San Mateo and Burlingame. The nearest library facilities include the College of San Mateo Library at 1700 West Hillsdale Boulevard, the San Mateo Public Library at 55 West 3rd Avenue, and the Burlingame Public Library at 480 Primrose Road.

Parks and Recreation Facilities

Park and recreation facilities in Hillsborough include two parks and a water conservation garden (Town of Hillsborough 2005). These parks are operated by the Hillsborough Recreation Department. The Hillsborough Recreation Department is a Joint Powers Agreement created by the Town and the Hillsborough City School District. By creating a Recreation Department, the School District is able to charge for the use of its facilities after normal school hours, thereby off-setting the additional maintenance costs related to heavier use of the fields. In addition to providing playing fields, a gym and tennis courts to youth sports programs and interested adults, the Recreation Department also offers children alternative afterschool activities.

The Town has a total of two acres of developed public parkland (Town of Hillsborough 2005). Vista Park, a 1.5-acre neighborhood park located off Vista Road between Chiltern and Culebra Roads, is the largest and oldest of the Town's two parks. Improvements to Vista Park were recently completed in 2006 (Town of Hillsborough 2023). Renovations included rehabilitation of the facility to address issues such as poor drainage and old equipment, as well as rehabilitation of the basketball court and soccer field. The park includes an arbor, picnic tables, and separate play equipment for children under 5 years of age and older kids. There is also a rubberized ground surfacing, exciting climbing rocks, and a huge play field complete with a clamshell backstop. The park is accessible to people in wheelchairs.

In 2003 the Hillsborough Beautification Foundation completed Crossroads Park, a quarter-acre pocket park located at the corner of Hayne and Black Mountain Roads on a former water tank site (Town of Hillsborough 2023). The park features benches and a water fountain. In addition to funding the park's construction, the Hillsborough Beautification Foundation also funds the maintenance of the park.

The Town also built Centennial Park (formerly named the Hillsborough Water Conservation Park) in 1989 at the Town Hall to demonstrate water conservation techniques for the benefit of homeowners in Hillsborough and surrounding communities (Town of Hillsborough 2005). Native, low water use and drought tolerant plants create an attractive garden utilizing mulch and an automatic drip irrigation system. It is open for the public's enjoyment to illustrate what can be created in this area of California, where the need for long-range water conservation is critical. The park was funded by grants from the State of California and contributions from private citizens and local garden clubs. The park was renovated in 2009 (Town of Hillsborough 2023).

Recreational Programs

Two private facilities, the Burlingame Country Club and the Hillsborough Racquet Club, offer recreational opportunities for their members. The Burlingame Country Club, with approximately 110 acres, preserves large areas in a more open setting. Hillsborough Recreation is an organization formed to provide sports and learning enrichment classes and programs to the Hillsborough community, including summer camps and activities. Town residents also have access to many nearby County recreational facilities.

Open Space

Hillsborough has preserved 259 acres of open space within the Town (Town of Hillsborough 2023). The majority of this land is located in the Skyfarm Subdivision area in the northwestern portion of Hillsborough, with three other large open space areas located near Southdown Court, Crystal Springs Road and in the Tobin Clark area, which includes the Tobin Clark Opportunity Site. In addition, there is another large area of open space adjacent to the Town, on the western side of I-280 that adds continuum to the low-density character of the community. The Town's open space areas are not open to the public.

Town residents have access to many nearby County recreational facilities including the extensive County open space areas that surround the Crystal Springs Reservoirs, to the west of I-280, and the recreational facilities along the San Francisco Bay, including Coyote Point County Recreation Area. Town residents also have access to the extensive Golden Gate National Recreation Area located adjacent to the Town to the west.

Figure 4.13-1 shows the location of parks in the Planning Area. Figure 3.3-1 in the Project Description depicts the location of lands in the Planning Area designated Open Space & Conservation.

Parks Deficiencies

Besides the school facilities used for sports and after school programs, the Town has approximately 1.72 acres of developed public parkland (Town of Hillsborough 2005). Based on the estimated 2020 population of 11,442 people, the Town currently provides approximately 0.18 acres of parkland per 1,000 residents. This amount of parkland is lower than is typically recommended for communities; however, many homes are situated on large lots and contain private recreational facilities such as yards, tennis courts, and pools. The Burlingame Country Club also provides an additional private recreational opportunity for its members. In addition, as noted above, Town residents have access to many nearby recreational facilities located outside the Town's borders. The Town has a goal of providing an additional three acres of parkland for every new 1,000 residents. With the high cost of land, there may be limited opportunities for additional parkland within Hillsborough, so future parks may be smaller and consist of five acre or less neighborhood parks, such as Vista Park, and less than one acre pocket parks, such as Crossroads Park.

The 2005 General Plan states one potential opportunity for additional parkland would be the reuse of Town property if there is no other use for the property, or it is not sold to generate revenue for the Town. Another potential opportunity for additional parkland will occur in the event that any remaining large parcels are subdivided.

To meet the Town's goal of three acres of developed/active parks per 1,000 residents for the Project's buildout population of 12,716 people, the Town would have to provide an additional 36.1 acres of park land.

4.13.2 Regulatory Setting

Federal

Standardized Emergency Management System and National Incident Management System (SEMS)

According to the State's SEMS, local agencies have primary authority regarding rescue and treatment of casualties and making decisions regarding protective actions for the community. When a major incident occurs, the first few moments are critical in terms of reducing loss of life and property. First responders must be sufficiently trained to understand the nature and the gravity of the event to minimize the confusion that inevitably follows catastrophic situations. This on-scene authority rests with the local emergency services organization and the incident commander. Additional information regarding the Town's SEMS program can be found in Chapter 4.8 Hazards and Hazardous Waste.

State

California Building Code

The 2022 California Building Code (CBC) became effective January 1, 2023, including Part 9 of Title 24, the California Fire Code. Section 701A.3.2 of the CBC requires that new buildings located in any Fire Hazard Severity Zone within State Responsibility Areas, any Local Agency Very High Fire Hazard Severity Zone, or any Wildland-Urban Interface Fire Area designated by the enforcing agency for which an application for a building permit is submitted, comply with all sections of the chapter.

This code establishes State fire regulations, including regulations for building standards (also set forth in the CBC), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training.

California Fire Code

The Town of Hillsborough has adopted the 2022 California Fire Code, with amendments to address specific local conditions and needs. See Section 4.16 Wildfire, which provides further detail about Hillsborough's local amendments to the California Fire Code.

Education Code Section 17620

Education Code Section 17620 allows school districts to assess fees on new residential and commercial construction within their respective boundaries. These fees can be collected without special city or county approval, to fund the construction of new school facilities necessitated by the impact of residential and commercial development activity. In addition, these fees can also be used to fund the reconstruction of school facilities or reopening schools to accommodate

development-related enrollment growth. Fees are collected immediately prior to the time of the issuance of a building permit by the Town or the County.

Leroy F. Green School Facilities Act (1998)

California Government Code Section 65995 sets base limits and additional provisions for school districts to levy development impact fees and to help fund expanded facilities to house new pupils that may be generated by the development project. Sections 65996(a) and (b) state that such fees collected by school districts provide full and complete school facilities mitigation under CEQA. These fees may be adjusted by the school district.

Quimby Act

Since the passage of the 1975 Quimby Act (California Government Code §66477), cities and counties have been authorized to pass ordinances requiring that developers set aside land, donate conservation easements or pay fees for park improvements. Revenues generated through the Quimby Act cannot be used for the operation and maintenance of park facilities. A 1982 amendment (AB 1600) requires agencies to clearly show a reasonable relationship between the public need for the recreation facility or park land and the type of development project upon which the fee is imposed. A 2013 amendment (AB1359) allows cities and counties to use developer paid Quimby Act fees to provide parks in neighborhoods other than the one in which the developer's subdivision is located. Previously, a city or county could only use the fees to provide parks that served the developer's proposed subdivision. AB 1359 lifted this limitation if certain requirements are met including:

1. The neighborhood where the city or county is proposing to use the fees to provide parks must have fewer than three acres of park area per 1,000 members.

2. The neighborhood where the proposed subdivision is located must have at least three acres of park area or more per 1,000 members.

3. The city or county must hold a public hearing before using the fees in another neighborhood.

4. The city or county must find it reasonably foreseeable that the new subdivision's residents will use the park facilities in the other neighborhood.

5. And finally, the city or county must use the fees in areas consistent with the city or county's local Quimby Act ordinance and General Plan.

AB 1359 also allows a city or county to enter into a joint or shared use agreement with one or more public districts to provide additional park and recreational access.

The Quimby Act sets a standard park space to population ratio of up to 3 acres of park space per 1,000 persons. Cities with a ratio of higher than three acres per 1,000 persons can set a standard of up to 5 acres per 1,000 persons for new development. The calculation of a City's park space to population ratio is based on a comparison of the population count of the last federal census to the amount of City-owned parkland. The Town of Hillsborough has adopted a

Park In-Lieu Fees Ordinance (Municipal Code Chapter 16.18) in compliance with the Quimby Act.

Local

Park Land Dedication In-Lieu Fee

Park In-Lieu Fees are assessed pursuant to the Quimby Act under Government Code Section 66447. Under the Quimby Act, local governments may require the dedication of land for parks or the payment of fees in-lieu of land dedication as a condition of subdivision map approval. The Park Land Dedication In-Lieu Fee is collected and expended to purchase land, buy equipment, or construct improvements in neighborhood parks and recreation facilities serving such subdivisions. The Town of Hillsborough collects Park In-Lieu Fees (Municipal Code Chapter 16.18) from developers of new subdivisions that are used to develop new or rehabilitate existing neighborhood or community park or recreational facilities that serve the proposed subdivision.

Hillsborough General Plan

The 2005 General Plan provides the fundamental basis for the Town's land use and development policy, and represents the basic community values, ideals, and aspirations to govern a shared environment over the life of the General Plan. The General Plan Land Use Element, Open Space and Conservation Element, and Public Safety Element include the following applicable policies:

School Services

Goal LU-3 - Allow for the operation of facilities and schools, while minimizing potential conflicts with residential uses.

> *Policy LU-3.1* - Ensure that Town-owned public facilities are designed and operated in a manner that allows for the provision of high quality, cost effective public service, but also take into consideration surrounding residential land uses.
>
> *Policy LU-3.2* - Review private school development and use proposals taking into account impacts of proposed school activities on adjacent residents, while recognizing the importance of the private schools to the community.
>
> *Policy LU-3.3* - Continue to work with the Hillsborough City School District to ensure that District continues to offer high quality educational services to the community while minimizing school-related impacts on the community.
>
> *Action LU-3.1* - The Town will provide for public review and involvement prior to approval of any proposed change to the conditions of a private school permit.
>
> *Action LU-3.2* - The Town will provide notice to the Hillsborough City School District when a private school proposes new development or a change to operations so that the District may comment on the proposal.

Goal LU-4 - Continue to provide high quality public services and recreational opportunities to maintain the character and quality of life in the Town.

Policy LU-4.3 - Continue to support the work of the public school boards to provide high quality educational opportunities to Hillsborough residents.

Action LU-4.2 - The Town, in cooperation with the Hillsborough City School District and San Mateo Union High School District, will continue to collect in-lieu fees, as allowed by State law, from new development for the construction of school facilities.

Goal OSC-1 - Continue to identify new opportunities for recreational facilities, and maintain existing facilities.

Action OSC-1.1 - The Town will continue to cooperate with the Hillsborough City School District through their Joint Powers Agreement to maintain the Hillsborough Recreation Department.

Library Services

Goal LU-4 Continue to provide high quality public services and recreational opportunities to maintain the character and quality of life in the Town.

Policy LU-4.4 - Continue to provide library service to meet community needs in a cost effective manner.

Action LU-4.7 - For Town contracted services, the Town will utilize the contract negotiation process to ensure that the specific needs of the community for various services, such as telecommunications, library and refuse collection, will be met by the selected service provided.

Parks and Recreation Facilities

Goal LU-2 Provide for orderly development in a manner compatible with the existing character of Hillsborough.

Policy LU-2.5 - Continue to require conceptual plans before applications for subdivisions of five lots or greater are submitted to the City Council. The Town's requirements for conceptual plans will be updated to require that during the preparation of a conceptual plan, special attention will be given to opportunities for:

- New recreational facilities, such as parks and trails
- Preservation of sensitive habitat areas in open space
- Multiple access points to the project to minimize the impacts.

Goal LU-4 - Continue to provide high quality public services and recreational opportunities to maintain the character and quality of life in the Town.

Policy LU-4.7 - Provide quality parks and open spaces that will consider the community's need for play areas, trails and pathways, and recreational facilities.

Action LU-4.1 - The Town will continue to utilize its budget planning process to ensure that Town-provided services are maintained at a level that meets the community's needs.

Goal LU-5 - Ensure that adequate review is completed prior to selling Town-owned property or purchasing or accepting dedications of land or facilities for residents' benefit or use.

Policy LU-5.1 - Review any proposed dedication to the Town of new recreational or other facilities to ensure that the dedication will provide benefits to the community and not create substantial burdens for Hillsborough.

Goal OSC-1 - Continue to identify new opportunities for recreational facilities, and maintain existing facilities.

Policy OSC-1.1 - Evaluate underutilized publicly-owned property for recreational reuse, working with other public agencies and private organizations when necessary.

Policy OSC-1.2 - Continue to support local community efforts to expand and improve recreational facilities and identify funding for the on-going maintenance of facilities.

Policy OSC-1.3 - Review future subdivision proposals for the opportunity to incorporate new recreational opportunities into the site design and/or require parkland in-lieu fees.

Action OSC-1.1 - The Town will continue to cooperate with the Hillsborough City School District through their Joint Powers Agreement to maintain the Hillsborough Recreation Department.

Action OSC-1.2 - The Town will adopt an ordinance in compliance with the Quimby Act to require new development to provide land dedication and/or in-lieu fees in the amount equal to three acres of parkland per 1,000 new residents. Due to the limited availability of land within Hillsborough for new parks, future additional parks will mainly consist of neighborhood parks of five acres or less and pocket parks of less than one acre. Larger parks will also be allowed.

Goal OSC-3 - Ensure the continued preservation, protection and restoration of the natural features and resources of the Town that are essential to maintaining the quality of life for residents and wildlife, including creek corridors, trees, slopes and woodlands, while minimizing potential conflicts, such as deer overpopulation.

Policy OSC-3.9 - Preserve dedicated open space areas and evaluate recreational potential of open space.

Fire Protection Services

Policy LU-4.2 - Coordinate with the Central County Fire Department or successor entity to provide excellent fire protection for the Town.

Policy PS-1.4 - Support excellent fire service through the maintenance of fire equipment and the training of fire personnel.

Action PS-1.3 - The Town will work with the Central County Fire Department to review and update, if necessary, the Town's and Department's regulations and approach regarding fire protection within Hillsborough to ensure adequate fire protection. Since the Town is mainly

residential, the focus of this review will be on reducing the risk of fire to and resulting from individual residential properties. This review and update process will include the following:

- Review adopted and proposed federal and State regulations and ensure that Hillsborough complies as appropriate. This will include reviewing the proposed International Code Council Urban Interface Code and amendments to Government Code 51182 to identify necessary revisions to Town and Department policies and regulations.
- Determine whether the Town will benefit from increased fire protection from adopting the State identified Wildfire Hazard Areas pursuant to Government Code Section 51179. Based on this analysis, the Town will either adopt the State identified VHFSZs, adopt locally designated VHFSZs, or make a determination that the Town is exempt from adopting VHFSZs since adopted regulation has the same or more stringent controls as would be applied with the designation of a VHFSZ.
- Develop wildfire suppression contingency plans for periods when funding or fire fighting resources for wildfire suppression are reduced due to homeland safety events that may redirect federal and State funding away from local wildfire suppression activities.

Action PS-1.4 - The Town will continue to work with the Central County Fire Department to ensure that regional approaches to fire protection and suppression generated by the County, California Department of Forestry (CDF) and Fire Safe San Mateo County are implemented in Hillsborough.

Police Protection Services

Policy LU-4.1 - Continue to provide a high level of police service to meet the specialized needs of Hillsborough.

Action LU-4.1 - The Town will continue to utilize its budget planning process to ensure that Town-provided services are maintained at a level that meets the community's needs.

Goal PS-5 - Protect the community from human-caused hazards, such as criminal activity, air pollution and hazardous materials.

Policy PS-5.1 - Continue to support the Hillsborough Police Department to maintain a low occurrence of criminal activity within the community and provide public education programs.

Action PS-5.1 - The Police Department will continue to provide information on crime prevention and community outreach such as, in-home Crime Prevention and Community Awareness Programs; private home inspections for proper locks, alarm and lighting; home alarm monitoring; and lending engraving pens to residents to mark their valuables.

4.13.3 Thresholds of Significance

Potential impacts related to public services and recreation were determined in accordance with Appendix G of the CEQA Guidelines. Impacts would be considered potentially significant if the proposed Project will:

A. Results 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 following public services:

1. Fire protection;
2. Police protection;
3. Schools;
4. Libraries; or
5. Parks and Recreation Facilities.

B. Result in increased use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

C. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

4.13.4 Impacts and Mitigation Measures

The proposed Project consists of updates to the existing 2014 - 2022 Housing Element to reflect the 6th cycle 2023 – 2031 housing assignments. In addition, associated amendments to the Land Use Element and General Plan Land Use Map, Open Space and Conservation Element, and Public Safety Element; amendments to Title 17 (Zoning) of the Hillsborough Municipal Code, and amendments to the Hillsborough Zoning Map are proposed for consistency of all Town documents, codes, and regulations. These associated amendments are generally described in sections 3.3.9 through 3.3.12 in the Project Description and would not result in environmental impacts to public services and recreation facilities. Therefore, they are not discussed further in this chapter. The impact analysis focuses on the residential development facilitated by the Draft 2023 – 2031 Housing Element.

Impact PS-1 – 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. *[Threshold of Significance (a)]*

Fire Protection Services

Implementation of the Project is estimated to result in an increase of approximately 605 dwelling units in the Planning Area (RHNA + buffer units) in the next eight years. This increase in development is likely to result in an increase in demand for fire protection services.

The General Plan Land Use and Public Safety Elements include the following policies and actions related to fire protection services:

Policy LU-4.2 - Coordinate with the Central County Fire Department or successor entity to provide excellent fire protection for the Town.

Action LU-4.1 - The Town will continue to utilize its budget planning process to ensure that Town-provided services are maintained at a level that meets the community's needs.

Policy PS-1.4 - Support excellent fire service through the maintenance of fire equipment and the training of fire personnel.

Action PS-1.3 - The Town will work with the Central County Fire Department to review and update, if necessary, the Town's and Department's regulations and approach regarding fire protection within Hillsborough to ensure adequate fire protection. Since the Town is mainly residential, the focus of this review will be on reducing the risk of fire to and resulting from individual residential properties. This review and update process will include the following:

- Review adopted and proposed federal and State regulations and ensure that Hillsborough complies as appropriate. This will include reviewing the proposed International Code Council Urban Interface Code and amendments to Government Code 51182 to identify necessary revisions to Town and Department policies and regulations.
- Determine whether the Town will benefit from increased fire protection from adopting the State identified Wildfire Hazard Areas pursuant to Government Code Section 51179. Based on this analysis, the Town will either adopt the State identified VHFSZs, adopt locally designated VHFSZs, or make a determination that the Town is exempt from adopting VHFSZs since adopted regulation has the same or more stringent controls as would be applied with the designation of a VHFSZ.
- Develop wildfire suppression contingency plans for periods when funding or fire fighting resources for wildfire suppression are reduced due to homeland safety events that may redirect federal and State funding away from local wildfire suppression activities.

Action PS-1.4 - The Town will continue to work with the Central County Fire Department to ensure that regional approaches to fire protection and suppression generated by the County, California Department of Forestry (CDF) and Fire Safe San Mateo County are implemented in Hillsborough.

Individual development projects are subject to standard pre-development review by several Town departments and the Central County Fire Department. This review process ensures that the projects include all relevant Fire Code building requirements such as the necessary and appropriate ingress/egress points, road widths and cul-de-sac turn arounds, exterior building materials, fire protection systems such as alarms and automatic sprinklers, and minimum fire flow requirements are incorporated into all project plans.

Future development that may be facilitated by implementation of the Project would result in an incremental increase in fire protection service demand as the Town's population grows and the number of residential units increases.

The CCFD completed a Community Risk Assessment Standards of Cover & Deployment Analysis in March 2023 (AP Triton Consulting 2023). The NFPA prescribes a total response time (i.e., time from alarm transfer or answering time until the arrival of the first unit at the incident) performance goal of 6 minutes, 15 seconds, 90 percent of the time for emergency medical

services (EMS) and 6 minutes, 35 seconds, 90 percent of the time for fire. CCFD's total response time performance goal is 6 minutes, 30 seconds or less at least 90 percent of the time for all calls (i.e., fire and EMS) types. For all incident types in the years 2020-2021 (actual), 2021-2022 (actual), and 2022-2023 (year to date (YTD)), a CCFD fire engine arrived at the scene of a structure fire within six minutes of dispatch approximately 86 percent, 73 percent, and 76 percent of the time, respectively (CCFD 2023). As such, the CCFD is not currently meeting its response time performance goal.

The addition of 554 new housing units that may be facilitated by implementation of the Project is not expected to significantly exacerbate any existing deficiencies, as all of the proposed opportunity sites for future development are located within close proximity of existing fire stations (see following discussion). Further, implementation of the recommendations within the Standards of Cover & Deployment Analysis should improve response performance both within the Planning Area and in other parts of CCFD's service area, as documented within the study.

All potential new housing units would be located within two miles of a CCFD or San Mateo County fire station. At this Program EIR stage, CCFD has not determined if the construction of 554 new units in Hillsborough would require new or expanded fire department facilities to serve Hillsborough. CCFD would monitor housing development with the Town over the eight-year planning period of the Draft 2023 – 2031 Housing Element and their ability to meet response times and make determinations on additional staffing, equipment, and fire station needs as new housing is developed. However, if new or expanded fire department facilities were to be required as a result of population growth, the new facilities would need to comply with existing environmental regulations, which would include a development review process and environmental review pursuant to CEQA. Officials from the Town have had several conversations with CCFD over the past several years, as the Town has developed its strategy for addressing the RHNA allocation, with both agencies understanding that the additional units are required by the State and therefore must be planned for. The Town and CCFD are committed to working together to evaluate response times as development occurs and assess whether the data indicates the need for new facilities or other modifications to maintain the appropriate level of service (Email correspondence with Liz Ruess 2023).

General Plan Policy LU-4.2 will continue to ensure the Town's coordination with the Central County Fire Department or successor entity to provide excellent fire protection for Hillsborough. Action LU-4.1 requires the Town to utilize its budget planning process to ensure that Town-provided services are maintained at a level that meets the community's needs.

All projects that are subject to CEQA review would be evaluated to determine whether they can be provided with adequate fire protection and emergency medical services, including adequate response times. In the event that it is determined that adequate services cannot be provided, project specific mitigation may be provided to offset identified service deficiencies.

Compliance with the policies and actions described above would ensure that adequate CCFD equipment and staffing would be available to serve future development associated with implementation of the Project and would ensure this potential impact would be ***less than significant.***

Police Services

Implementation of the Project is estimated to result in an increase of approximately 605 dwelling units (RHNA + Buffer) in the Planning Area. This increase in development is likely to result in an increase in demand for policing services.

The General Plan Land Use and Public Safety Elements include the following goals and policies relate to police protection services:

> *Policy LU-4.1* - Continue to provide a high level of police service to meet the specialized needs of Hillsborough.
>
> *Action LU-4.1* - The Town will continue to utilize its budget planning process to ensure that Town-provided services are maintained at a level that meets the community's needs.

Goal PS-5 - Protect the community from human-caused hazards, such as criminal activity, air pollution and hazardous materials.

> *Policy PS-5.1* - Continue to support the Hillsborough Police Department to maintain a low occurrence of criminal activity within the community and provide public education programs.
>
> *Action PS-5.1* - The Police Department will continue to provide information on crime prevention and community outreach such as, in-home Crime Prevention and Community Awareness Programs; private home inspections for proper locks, alarm and lighting; home alarm monitoring; and lending engraving pens to residents to mark their valuables.

Policy LU-4.1 and Action LU-4.1 address ensuring that there are adequate Town-provided services, which would include law enforcement resources, to serve community needs. Implementation of Action LU-4.1 involves employing the Town's budget planning process to ensure the current level of development in the Town is adequately served by Town-provided services.

The Project would result in the incremental increase in need for law enforcement services as the Town's population grows and the number of residential units increases. Based on FBI statistics, the nationwide ratio of sworn officers is 2.4 per 1,000 inhabitants[41], which is consistent with the current ratio for the Town (2.44 sworn officers per 1,000 residents). To maintain this ratio over the duration of the Project, there would need to be an increase of up to 3.1 officers over the next eight years (assuming 1,274 new residents). This represents an increase of future residential development on multi-family opportunity sites such as the Tobin Clark site, for example, which could potentially result in up to 100 new units, presents access issues that could require additional police resources.

In addition to creating an incremental increase in police service demand, new residential development could result in increased response times. It is also possible that increased development would result in an increase in traffic, particularly for the multi-family opportunity

[41] Federal Bureau of Investigation, Criminal Justice Information Services Division. 2017 Police Employee Data. www.https://ucr.fbi.gov/crime-in-the-u.s/2017/crime-in-the-u.s.-2017/topic-pages/police-employee-data#:~:text=Nationwide%2C%20the%20rate%20of%20sworn,(Based%20on%20Table%2074.)

sites such as Tobin Clark and the Town Hall site, and additional officers and police cars would potentially be needed to effectively enforce traffic laws. Compliance by the Town with the Policy LU-4.1 and Action LU-4.1, which require the Town to maintain adequate service levels, including police protection service, in alignment with community needs, would ensure that new or expanded police facilities would be constructed to meet the needs of the new population growth. If a new or expanded facility were to be required as a result of population growth associated with the proposed Project (1,274 new residents), the new facility would need to comply with existing environmental regulations, which would include a development review process and environmental review pursuant to CEQA. As such, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered facilities.

As stated above, the Project could result in an increased demand for up to 3.1 sworn police officers during the eight-year duration of the next housing cycle. This would represent an increase of approximately 11 percent over the current number of sworn officers, or approximately 1.4 percent per year during this period. Because of the requirements for development review and additional environmental review for the construction of any required future police facilities, and the relatively small number of additional police officers that could be required as a result of the Project, this impact would be less than significant.

School Services

New housing that may be facilitated by the implementation of the Project would likely result in an increase in students within the Planning Area. Using an elementary/middle (K-8) and high student generation rate of 0.11 students per unit,[42] construction of 605 residential units (RHNA assignment + buffer units which would be a worst-case scenario) would result in 67 elementary/middle school students and 67 high school students. It should be noted that several smaller unit types, including ADUs and studio or one-bedroom apartments, are unlikely to generate any students given their anticipated small size. However, to be conservative, it is estimated that every type of unit, regardless of size, would generate 0.11 elementary/middle school students and 0.11 high school students. The following discussion describes services within each school district.

Hillsborough City School District. It is anticipated implementation of the Focused GPU would result in an addition of approximately 67 elementary and middle school students in the Hillsborough City School District over the eight-year period of the next housing cycle. As shown in Table 4.13-2**,** over the last five years (2018-2023), there has been a decline in enrollment of 40 students. In 2022-2023, the District had 1,313 students. Hillsborough City School District currently collects fees in the amount of $0.90 per square foot for new residential construction. The current maximum residential development fee amount that could be imposed is $2.45 per square foot. The Developer Fee Justification Study concluded the School District is justified in imposing the residential development fee of $2.45 per square foot. In addition to developer fees, funding to upgrade aging school facilities and classrooms to meet current earthquake/fire

[42] The Developer Fee Study for the San Mateo Union High School District included a 0.1096 weighted student generation rate and the Developer Fee Study for the Hillsborough City School District included a 0.11 student generation rate. While the Hillsborough City School District provided a different rate (0.22) for single-family homes, as the majority of units would be anticipated to be accessory dwelling units (ADUs), which, as noted above, are unlikely to generate any students, and multi-family units, a student generation rate of 0.11 was used for all elementary/middle school student generation within the Planning Area.

standards, and replace outdated portables with permanent classrooms will be provided through Bond Measure H, approved by District residents in June 2022. Measure H would issue $140,000,000 in bonds and raise $6,600,000 annually.[43]

The new elementary and middle school student population that may be contributed by the Project would be generated incrementally over a period of eight years and would amount to a five percent increase in population over the District's existing student population. Considering Project student population generation would be incremental and the District is anticipating increased funding in the near future through increased residential development fees and Measure H funds, it is anticipated that the additional number of students that would be associated with implementation of the Project could likely be accommodated within existing facilities.

San Mateo Union High School District. It is anticipated implementation of the Focused GPU would result in an addition of approximately 67 high school students in the San Mateo Union High School District. In 2022-2023, the District had 8,844 students. The District has a capacity of 11,581 students. The District is projected to have 3,228 open seats districtwide in 2024. San Mateo Union High School District currently collects fees in the amount of $1.39 per square foot for new residential construction. The current maximum residential development fee amount that could be imposed is $1.92 per square foot. The School Impact Fee Justification Study concluded the District is justified in imposing the residential development fee of $1.92 per square foot. It is anticipated that the additional number of students that would be associated with implementation of the Project could likely be accommodated within existing facilities.

Summary. Table 4.13-2 shows that the Hillsborough City School District has experienced declining enrollment over the last five years, and that the San Mateo Union High School District has experienced declining enrollment over the last four years. Additionally, the San Mateo Union High School District is projected to have 3,228 open seats in 2024 and an increasing number of open seats through 2028. It is likely that residential growth associated with implementation of the Project can be accommodated by existing school facilities and would not result in the need for additional school facilities.

It should be noted that while the Town has identified the overall level of housing development associated with implementation of the Project (605 residential units), there is less certainty about the type of units that may be constructed. Many unit types (such as accessory dwelling units (ADUs), studio units, 1-bedroom apartment units, or units marketed to seniors) are unlikely to generate new students given the size or type of unit. Additionally, the Draft 2023 – 2031 Housing Element is an eight-year plan and the Town cannot identify the exact timing that development may occur as the majority of development would be undertaken by private entities. Further, as many school districts in California have experienced a general decline in enrollment over the last five years, a trend that is anticipated to continue, available capacity within a school district may change year-to-year.

Payment of school impact fees, as allowed by Government Code 65996, are meant to offset increased student enrollment and has been deemed by the State legislature (per Government

[43] https://ballotpedia.org/Hillsborough_City_School_District,_California,_Measure_H,_Bond_Issue_(June_2022). Accessed October 4, 2023.

Code Section 65995(h)) to constitute full and complete mitigation of impacts of a development project on the provision of adequate school facilities. **Table 4.13-3** shows current developer fees by school district. Any specific school facility developments would be subject to environmental review on a project-by-project basis.

Table 4.13-3: Developer Fee by School District

	School District	
	Hillsborough City School District	**San Mateo Union High School District**
Maximum Residential Development Statutory Fee	$4.08 per square foot	$4.79 per square foot
Percent of fee total allocated to San Mateo Union High School District [in the case of Hillsborough City School District] or San Mateo-Foster City Elementary School District [in the case of San Mateo Union High School District]	40 percent of fee	60 percent of fee
Residential Development Fee Amount Collected by District	$2.45 per square foot	$1.92 per square foot

Sources: Hillsborough City School District, Developer Fee Justification Study, 2020; San Mateo Union High School District, School Impact Fee Justification Study, Residential and Commercial/Industrial Development, 2022.

The following policies from the General Plan Land Use Element relate to ensuring adequate public school services are provided to the community:

Goal LU-3 Allow for the operation of facilities and schools, while minimizing potential conflicts with residential uses.

> *Policy LU-3.1:* Ensure that Town-owned public facilities are designed and operated in a manner that allows for the provision of high quality, cost effective public service, but also take into consideration surrounding residential land uses.
>
> *Policy LU-3.3:* Continue to work with the Hillsborough City School District to ensure that District continues to offer high quality educational services to the community while minimizing school-related impacts on the community.

Goal LU-4 Continue to provide high quality public services and recreational opportunities to maintain the character and quality of life in the Town.

> *Policy LU-4.3:* Continue to support the work of the public school boards to provide high quality educational opportunities to Hillsborough residents.
>
> *Action LU-4.2:* The Town, in cooperation with the Hillsborough City School District and San Mateo Union High School District, will continue to collect in-lieu fees, as allowed by State law, from new development for the construction of school facilities.

Through the payment of associated development fees, compliance with applicable State and local regulations, adherence to policies and actions included in the General Plan, and with 3,228 projected open seats at SMUHSD in 2024, the impacts of the Project on school facilities would be ***less than significant***.

Library Services

Implementation of the Project has the potential to add 1,274 new residents to the Town's population,[44], which could result in increased demand for library services. As Hillsborough residents are able to access library services through the Peninsula Library System and are able to borrow materials from any of the Peninsula Library System's member library branches, it is unlikely that the increase in population in Hillsborough as a result of the Project would adversely impact the Peninsula Library System given its size.

Any remodeled or new library facility would be subject to environmental review under CEQA. Environmental review would identify site-specific conditions and physical changes resulting from library expansion or construction. New residential development within the Planning Area would result in an increase in the tax base of the Town and could be used to offset the incremental demand for library services. Therefore, the impact of the Focused GPU on library services would be ***less than significant***.

Parks and Recreational Facilities

New development anticipated by implementation of the Project has the potential to add 1,274 new residents to the Town's population,[45] which would increase the demand for park and recreational facilities in the Planning Area. As discussed previously, the Town has approximately 1.72 acres of developed public parkland, which equates to about 0.15 acres of parkland per 1,000 residents (Town of Hillsborough 2005). While this parkland ratio is far below the recommended parkland ratio (3 acres of parkland per 1,000 residents per the Quimby Act) for communities, most residents in Hillsborough live on large private lots with private recreational facilities. Per the 2005 General Plan, the Town has a goal of providing an additional three acres of parkland for every new 1,000 residents. New residents to the Town because of the Project would result in approximately 0.135 acres of parkland per 1,000 residents. To meet the Town's parkland ratio of three acres per every 1,000 residents during the planning period of the proposed Housing Element (2023 – 2031), the Town would need to add 36.1 acres of new parkland in addition to the existing two acres of developed parkland in the Town.

General Plan Action OSC-1.2 requires the Town to adopt a Quimby ordinance in compliance with the Quimby Act to require new development to provide land dedication and/or in-lieu fees in the amount equal to three acres of parkland per 1,000 new residents. The Town implements Action OSC-1.2 through the enforcement of Municipal Code Chapter 16.18 (Park In-Lieu Fees). Policy OSC-1.3 calls for the Town to review future subdivision proposals for the opportunity to

[44] Based on an average household size of 2.3 persons, as utilized in preparation of the transportation analysis (see Chapter 4.14 Transportation) and which also took into consideration land use and projected unit types for consistency with County/City Association of Governments (C/CAG) transportation planning models.

[45] Based on an average household size of 2.3 persons, as utilized in preparation of the transportation analysis (see Chapter 4.14 Transportation) and which also took into consideration land use and projected unit types for consistency with County/City Association of Governments (C/CAG) transportation planning models.

incorporate new recreational opportunities into the site design and/or require parkland in-lieu fees. Policy OSC-1.3 and Policy LU-2.5, which requires conceptual plans, which must include opportunities for new recreational facilities, before applications for subdivisions for five lots or greater, would help reduce parks and recreation impacts that may be associated with the Project's proposed Subdivision/Lot Split Opportunity Sites, if said sites are developed. Policy OSC-1.1 and OSC-1.2 encourage the Town to explore opportunities to reuse existing non-recreational properties for recreational use and to expand recreational facilities in general. Policy LU-4.7 requires the provision of parks and open spaces that consider community needs. Lastly, Action LU-4.1 calls for the Town to utilize its budget planning process to ensure that Town-provided services are maintained at a level that meets the community's needs.

The specific environmental impact of constructing new individual park or recreation facilities would be evaluated at the time that new development projects potentially resulting in the demand for such facilities are proposed. As future new development proposals are evaluated, specific park and recreation facility requirements will be identified through the environmental review process and appropriate mitigation measures will be implemented that could include the dedication of parkland, construction of new facilities or rehabilitation of existing facilities, and/or the payment of in-lieu fees. Therefore, the Project's potential impact on parks and recreation facilities would be ***less than significant***.

Impact PS-2: Result In An Increased Use Of Existing Neighborhood And Regional Parks Or Other Recreational Facilities Such That Substantial Physical Deterioration Of The Facility Would Occur Or Be Accelerated. *[Threshold of Significance (b)]*

As noted above under response to Impact PS-1, the Project has the potential to add 1,274 new residents to the Town's population which would increase the demand for park and recreational facilities in the Planning Area. The Town currently provides 0.15 acres of parkland per 1,000 residents. The Project would result in approximately 0.135 acres of parkland per 1,000 residents. To meet the Town's goal of three acres of parkland per 1,000 residents for the Project's buildout population of 12,716 people, the Town would have to provide an additional 36.4 acres of parks.

As noted above, existing General Plan Actions and Policies and Municipal Code requirements (General Plan Action OSC-1.2, Policy OSC-1.3, Policy LU-2.5, Policy OSC-1.1, Policy LU-4.7, and Action LU-4.1 and Municipal Code Chapter 16.18) help the City meet the parkland ratio goal and would make sure that existing facilities are not negatively impacted by future growth. The specific environmental impact of constructing new individual park or recreation facilities would be evaluated at the time that new development projects potentially resulting in the demand for such facilities are proposed. As future new development proposals are evaluated, specific park and recreation facility requirements will be identified through the environmental review process and appropriate mitigation measures will be implemented that could include the dedication of parkland, construction of new facilities or rehabilitation of existing facilities, and/or the payment of in-lieu fees. Therefore, implementation of the proposed Project would result in a ***less than significant impact*** on parks and recreational facilities.

Impact PS-3: Include Recreational Facilities Or Require The Construction Or Expansion Of Recreational Facilities Which Might Have An Adverse Physical Effect On The Environment. *[Threshold of Significance (c)]*

The Project does not specially propose or authorize the construction of any new recreational facilities or expansion of existing recreational facilities. As stated previously, the environmental impacts of future new parks or recreational facilities, and expansion of existing parks or recreational facilities would be evaluated at the time that the new development projects potentially resulting in the demand for such facilities are proposed. As future new development proposals are evaluated, specific park and recreation facility requirements will be identified through the environmental review process and appropriate mitigation measures will be implemented that could include the dedication of parkland, construction of new facilities or rehabilitation of existing facilities, and/or the payment of in-lieu fees. Therefore, implementation of the proposed Project would result in a ***less than significant impact*** on parks and recreational facilities.

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4.14 Transportation

4.14.1 Environmental Setting

Project Location

The Town of Hillsborough is located in San Mateo County, approximately 20 miles south of San Francisco and 40 miles north of San Jose, and situated between El Camino Real (SR 82) and Interstate 280 (I-280) north of the SR 92 freeway. There are no freeways within the Town limits and most of the Town's street network consists of local streets. El Camino Real (SR 82) is the only street in Hillsborough classified in the Town's General Plan as a major arterial, while Crystal Springs Road and Skyline Boulevard (SR 35) are minor arterials. Collector streets include Chateau Drive, Ralston Avenue, El Cerrito Avenue, Hayne Road, Black Mountain Road, and Hillsborough Boulevard. The street network is shown in Figure 4.14-1.

Travel Characteristics

Residents of Hillsborough rely primarily on personal motor vehicles for commuting. As reported in the 2019 American Community Survey (which reflects commuting prior to the COVID-19 pandemic), 79.1 percent of working Hillsborough residents commuted by car, truck, or van, with 71.6 percent driving alone. Public transportation was used as the primary commute mode by 5.1 percent of workers living in Hillsborough. Approximately 0.1 percent of workers reported walking or biking to work, while 13 percent worked from home.

This commute pattern is similar to San Mateo County as a whole, although the countywide use of public transportation is higher. Countywide, 78 percent of County residents commute by car, truck, or van; 11 percent by public transportation; 4.1 percent by walking and biking; and 5.3 percent work from home. The higher countywide public transportation rate appears to be due to the availability of BART service in the northern part of the county, as 5.2 percent of workers reported commuting by subway or elevated rail.

In terms of commute distance, 87.2 percent of employed Hillsborough residents travel less than 25 miles to work, with 46.2 percent having commutes of less than 10 miles and 41.0 percent traveling 10 to 24 miles (U.S. Census Bureau 2019).

Existing Circulation Network

Study Area Roadways

The Town of Hillsborough General Plan includes the following functional classifications of roadways that are located in or provide access to Hillsborough.

A. Freeways. Freeways are limited-access, high-speed travelways included in the State and federal highway systems. Their purpose is to carry regional and longer-distance traffic. Access is provided by interchanges with typical spacings of one mile or greater. No direct access is provided to adjacent land uses. I-280 skirts the western boundary of the Town and SR 92 and US 101 are located to the south and east of Hillsborough, respectively.

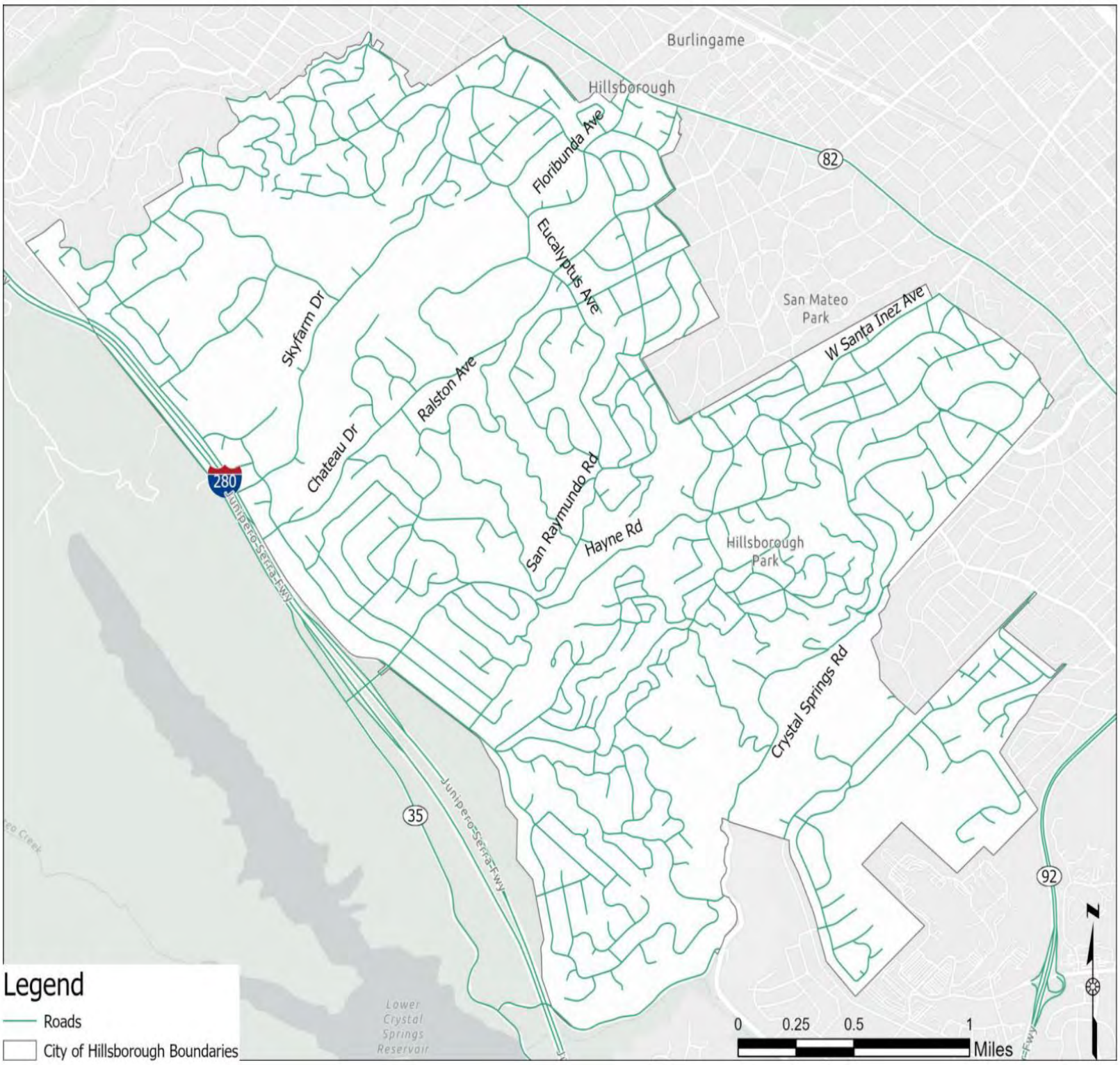


Figure 4.14-1 Existing Road Network

B. Arterials. Arterial roadways are major streets that primarily serve through traffic and provide access to abutting properties as a secondary function. Arterials are generally designed with two to six travel lanes and major cross-street intersections are signalized. This roadway type is divided into two categories: major and minor arterials. Major arterials are typically four- or more lane roadways and serve both local and through traffic. El Camino Real is Hillsborough's only major arterial. Minor arterials are typically two- to four-lane streets and serve local and commute traffic. Minor arterials within Hillsborough include Crystal Springs Road and Skyline Boulevard (SR 35).

C. Collectors. Collectors are streets that provide land access and traffic circulation within residential areas. They connect local streets to arterials and are typically designed with two travel lanes. Examples of collectors in Hillsborough include El Cerrito Avenue, Hayne Road, Black Mountain Road, Chateau Drive, Ralston Avenue, and Hillsborough Boulevard.

D. Local Streets. Local streets provide direct access to abutting residential properties as their primary function. In Hillsborough, the majority of streets are local streets.

Freeways and State Highways

US Route 101

US 101 is a major north-south highway that runs between Southern California and the state of Washington. Locally it is configured as a ten-lane, grade-separated freeway and is a major corridor connecting communities on the San Francisco Peninsula with San Francisco and San Jose. From the San Mateo/Santa Clara County line to I-380, the innermost lane in each direction operates as an express lane from 5:00 a.m. to 8:00 p.m., requiring a fee except for vehicles with three or more occupants and certain exempt vehicles. US 101 does not pass through Hillsborough, but it provides regional access via the interchanges in Burlingame and San Mateo at Broadway, Poplar Avenue, Peninsula Avenue, and Third/Fourth Avenues.

Interstate 280

A major north-south route along the Peninsula, I-280 is an eight-lane grade-separated freeway connecting San Jose with San Francisco and is located along the western boundary of Hillsborough. Access to I-280 from the Town is provided by its interchange at Hayne Road/Black Mountain Road.

State Route 92

SR 92 passes through San Mateo County south of Hillsborough and is one of the only east-west routes across the Peninsula, connecting Half Moon Bay with Foster City and the East Bay across the San Mateo-Hayward Bridge. SR 92 is a six- to eight-lane freeway between I-880 in Hayward and El Camino Real (SR 82), including the San Mateo Bridge; it is a four-lane freeway between El Camino Real and I-280; west of I-280 it is considered an arterial that includes two lanes. Access to SR 92 from Hillsborough is provided via interchanges in San Mateo at Alameda de Las Pulgas and Hillsdale Boulevard.

El Camino Real (SR 82)

El Camino Real, designated as SR 82 and a major arterial, is a regional route that extends from I-880 in San Jose to I-280 in San Francisco. El Camino Real functions as a state highway and commercial corridor through communities along the San Francisco Peninsula and is located just outside the eastern boundary of Hillsborough. The roadway has two to three through lanes in each direction and a posted speed limit of 35 miles per hour (mph).

Skyline Boulevard (SR 35)

Skyline Boulevard, designated as SR 35, is a regional route along the western edge of the Town that extends from 19th Avenue (SR 1) in San Francisco to SR 17 near Scotts Valley in Santa Cruz County. Skyline Boulevard is designated a minor arterial roadway in the Town and primarily functions as access to I-280 for local traffic. The roadway has one through lane in each direction and a posted speed limit of 45 mph.

Arterials

Crystal Springs Road

Crystal Springs Road is a minor arterial roadway that runs northeast-southwest through the southern and eastern parts of Hillsborough, connecting with San Mateo to the east and Skyline Boulevard to the west. Within the Town limits there is one travel lane in each direction, the speed limit is 30 mph, and land uses are primarily residential.

Existing Pedestrian and Bicycle Facilities

This section describes the existing pedestrian and bicycle facilities in the City of Hillsborough.

Pedestrian Facilities

The Town of Hillsborough has very limited sidewalk coverage along the local street network as the Town has historically prohibited sidewalks in an effort to maintain the community's rural character. Pedestrians walking along Hillsborough's streets are generally required to share the roadway with vehicles or may use the parking lane that is present on some streets, when not occupied by parked vehicles.

Bicycle Facilities

Bicycle facilities in Hillsborough include Class II bike lanes and Class III bike routes. Bike lanes currently exist on the south side of Crystal Springs Road east of Tulane Road as well as along Skyline Boulevard between Summit Drive and Hayne Road. Class III bike routes with shared lane ("sharrow") pavement markings are found along portions of Hillsborough Boulevard, Sharon Avenue, Chateau Drive, Ralston Avenue, El Cerrito Avenue, Black Mountain Road, and Crystal Springs Road.

Existing Transit Service

No public transportation is available within the Town limits of Hillsborough, but services provided by SamTrans and Caltrain can be accessed in San Mateo and Burlingame; for some residents

in the eastern part of Hillsborough these services are within walking distance. In addition to the direct access they provide to various destinations, Caltrain and SamTrans services can be used to connect to regional and local transit services in other Bay Area jurisdictions.

SamTrans

SamTrans provides fixed-route bus service throughout San Mateo County but does not have any routes within the Town of Hillsborough. However, the following two routes, shown in Figure 4.14-2 serve El Camino Real adjacent to the Town:

- Route ECR provides service along El Camino Real from the Palo Alto Transit Center to the Daly City BART Station. On weekdays the bus runs every 20 minutes from approximately 4:00 a.m. until 2:00 a.m. On weekends, it runs every 30 minutes from 4:45 a.m. until 2:00 a.m.
- Route 397 runs between Downtown San Francisco and the Palo Alto Transit Center, serving El Camino Real in the vicinity of Hillsborough. It operates daily from approximately 1:00 a.m. until 6:30 a.m. with one-hour headways and no midday or evening service. Major stops served by Route 397 include the San Francisco International Airport, the Millbrae Transit Center, and the Redwood City Transit Center.

In addition, SamTrans Route 250 serves San Mateo College in San Mateo, which is located near the southern boundary of Hillsborough. The route connects to the Hillsdale and San Mateo Caltrain stations as well as several shopping centers. Service is available from 6:00 a.m. to 11:00 p.m. on weekdays with 30-minute headways, with hourly weekend service from 7:00 a.m. to 8:30 p.m. on Saturdays and 9:00 a.m. to 7:00 p.m. on Sundays.

Caltrain

Caltrain is the commuter rail line serving the San Francisco Peninsula, connecting neighboring San Mateo and Burlingame with San Francisco to the north and San Jose and Gilroy to the south. On weekdays there are 38 trains servicing the San Mateo station in the northbound and southbound directions. On weekends, there are 16 trains that stop at the station in each direction. There are no Caltrain stations in Hillsborough, but some Hillsborough residents live within one-half mile of the Broadway, Burlingame, and/or San Mateo stations, which is generally considered an acceptable walking distance.

Bay Area Rapid Transit (BART)

BART provides regional heavy-rail rapid transit service, with stations in Alameda, Contra Costa, San Francisco, San Mateo, and Santa Clara Counties. Although BART does not provide service to Hillsborough, connections to and from the area are available to the Millbrae and San Francisco International Airport stations via Caltrain and SamTrans bus service.

San Francisco Bay Ferry

The Water Emergency Transportation Authority (WETA) operates the regional San Francisco Bay Ferry service. The only ferry terminal on the Peninsula is in the City of South San Francisco, from where weekday ferry service is available to the Cities of Alameda and Oakland. The South San Francisco ferry terminal includes parking; it is not directly served by transit.

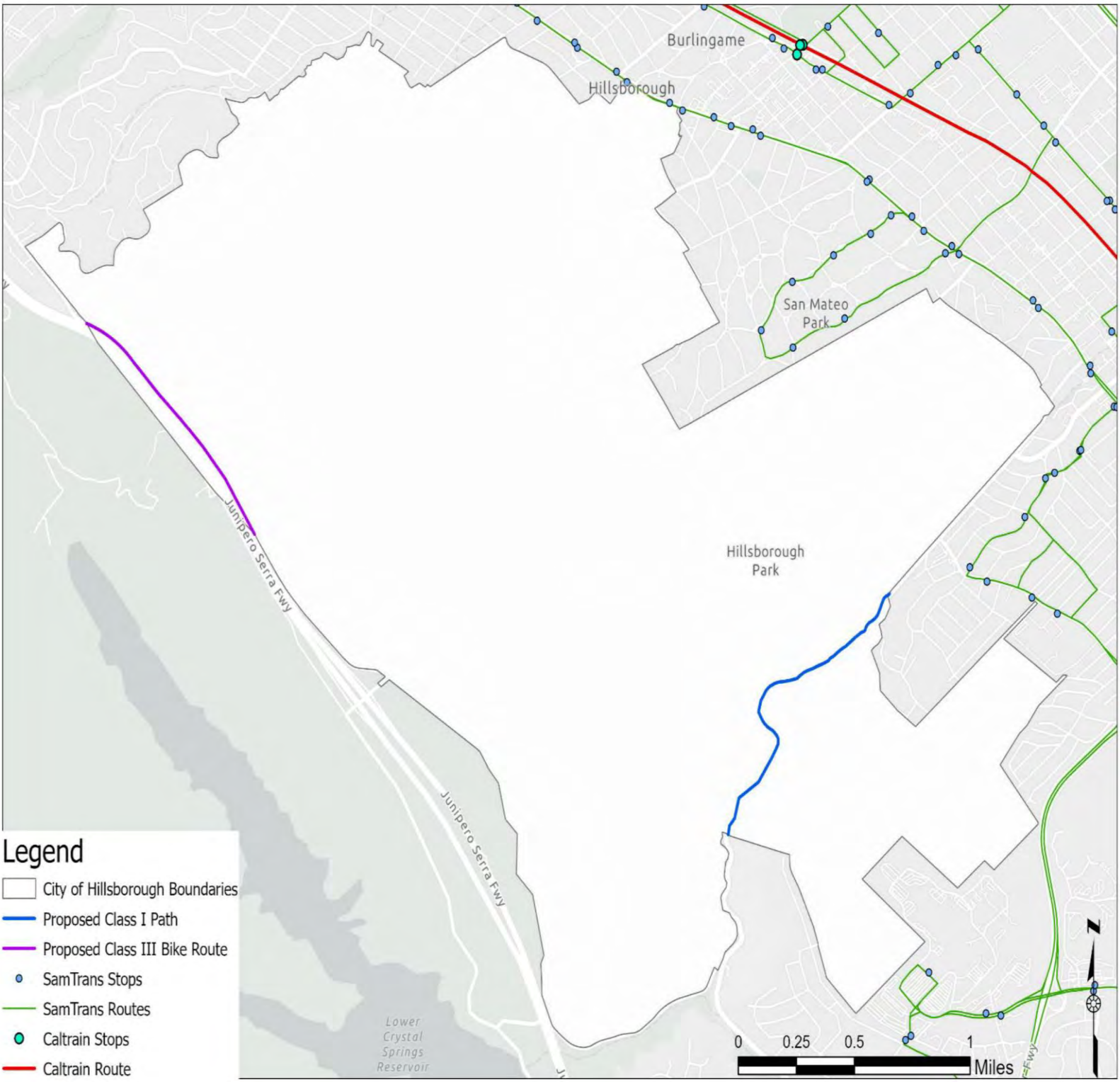


Figure 4.14-2 Proposed Bike Routes and Transit Map

Paratransit

For people with disabilities who cannot independently use regular fixed-route transit services, SamTrans provides paratransit service. Paratransit is an on-demand curb-to-curb service provided by Redi-Wheels in Hillsborough and other bayside San Mateo County communities. Redi-Wheels operates daily service between the hours of 5:30 a.m. and midnight. Riders must have their eligibility certified by SamTrans and reservations can be made one to seven days in advance.

On-Demand Transportation Services

Point-to-point transportation for trips within Hillsborough and between Hillsborough and other jurisdictions is available through on-demand transportation services such as private taxis and transportation network companies (TNCs). Both types of services are available 24 hours a day. TNCs such as Lyft and Uber provide prearranged transportation services for compensation using an online-enabled application or platform (such as smart phone apps) to connect drivers using their personal vehicles with passengers.

Truck Routes

The Town of Hillsborough has no designated truck routes.

Planned Major Transportation Projects

Plan Bay Area 2050 includes several projects that would impact transportation to and from Hillsborough. These investments primarily consist of capital and operational enhancements to use the existing regional highway and transit infrastructure more efficiently. Projects that would most directly affect Hillsborough include the following.

- Bus rapid transit (BRT) improvements to existing bus service along El Camino Real connecting Daly City BART with the Palo Alto Caltrain Station, including increased frequency, dedicated lanes along portions of the route, and addition of transit signal priority infrastructure.
- Rail improvements along the Caltrain/High Speed Rail Corridor between San Francisco and San Jose, including corridor electrification and an increase in frequency. For Hillsborough, Millbrae would be the nearest station where high-speed rail could be accessed.
- New express bus service along US 101 and I-280 (on express lanes where available) to downtown and western San Francisco, including the addition of park-and-ride facilities, ramp improvements, and bus stop improvements.
- New express bus service along US 101, SR 85 and I-280 (on express lanes where available) between San Francisco (Salesforce Transit Center) and San Jose (Diridon Station). Planned improvements include high-frequency service and station area amenities such as upgraded local bus stops, taxi/TNC loading zones, and improved bicycle/pedestrian infrastructure.

4.14.2 Regulatory Setting

Local, regional, State, and Federal policies regulate many aspects of the Town's transportation system, including planning and programming; design; operations; and funding. While the Town

of Hillsborough has primary responsibility for the maintenance and operation of local transportation facilities, there is ongoing coordination between Hillsborough staff and regional, state, and federal agencies to plan, manage, and enhance the Town's transportation assets; these entities include San Mateo County, San Mateo County Transportation Authority (SMCTA), City/ County Association of Governments of San Mateo County (C/CAG), Metropolitan Transportation Commission (MTC), California Department of Transportation (Caltrans), regional transit providers and Federal Highway Administration.

State

California Department of Transportation (Caltrans)

Caltrans is the owner and operator of the state highway system, with several roadways in or near Hillsborough, including I-280, SR 92, and El Camino Real (SR 82. In its Vehicle Miles Traveled-Focused Transportation Impact Study Guide (TISG), 2020, Caltrans developed an approach for evaluating the transportation impacts of land use projects and plans on state highway facilities; this document does not address the impacts of transportation projects. In accordance with current CEQA requirements, the TISG does not consider vehicle delay in its evaluation of transportation impacts, instead focusing on vehicle miles traveled (VMT). The purposes of the TISG include providing guidance to lead agencies regarding when they should analyze potential impacts to the state highway system; to aid Caltrans staff in reviewing projects; and to ensure consistency in the assessment of impacts and identification of non-capacity increasing mitigation measures.

California Senate Bill 743 (SB 743)

SB 743 was signed into law in 2013 and requires lead agencies to change how they evaluate transportation impacts under CEQA, moving away from traditional metrics such as intersection delay in favor of VMT associated with a project. This legislation supported previous climate-focused and transportation legislation adopted in California, including the Sustainable Communities and Climate Protection Act of 2008 (SB 375), the California Global Warming Solutions Act of 2006 (AB 32), as well as the Complete Streets Act (AB 1358), which requires local governments to plan for a balanced, multimodal transportation network that meets the needs of all users. In December 2018, the Governor's Office of Planning and Research (OPR) issued a final advisory to guide lead agencies in implementing SB 743, Technical Advisory on Evaluating Transportation Impacts in CEQA. Key guidance from the Technical Advisory includes the following.

- VMT is the most appropriate metric to evaluate a project's transportation impact under CEQA.
- VMT for residential and office projects should generally be assessed using efficiency metrics, i.e., on a "per rate" basis.
- The OPR-recommended threshold of significance for residential projects is a VMT per capita of fifteen percent below the city or regional average. Applying this threshold, a residential project expected to generate VMT per capita that is more than 85 percent of the regional VMT per capita could result in a significant impact. This threshold was developed to support statewide GHG emission reduction targets.

- Lead agencies have the discretion to set or apply their own significance thresholds in lieu of those recommended in the advisory, provided they are based on substantial evidence.
- Cities and counties still have the ability to use metrics such as level of service (LOS) for other plans, studies, or network monitoring. However, LOS and similar metrics cannot constitute the sole basis for determining transportation impacts under CEQA.

Regional

Plan Bay Area 2050

Adopted by the Metropolitan Transportation Commission and Association of Bay Area Governments in 2021, Plan Bay Area 2050 is the Regional Transportation Plan/Sustainable Communities Strategy for the nine-county San Francisco Bay Area. The purpose of this plan is to address regional transportation, housing, economic development, and environmental resilience. The plan identifies funding priorities for a $1.4 trillion vision over a 30-year period.

Plan Bay Area 2050 includes 35 key strategies, 12 of which focus on transportation:

- T1. Restore, operate and maintain the existing system. Commit to operate and maintain the Bay Area's roads and transit infrastructure while reversing pandemic-related cuts to total transit service hours.
- T2. Support community-led transportation enhancements in Equity Priority Communities. Provide direct funding to historically marginalized communities for locally identified transportation needs.
- T3. Enable a seamless mobility experience. Eliminate barriers to multi-operator transit trips by transfer hubs.
- T4. Reform regional transit fare policy. Streamline fare payment and replace existing operator-specific discounted fare programs with an integrated fare structure across all transit operators.
- T5. Implement per-mile tolling on congested freeways with transit alternatives. Apply a per-mile charge on auto travel on select congested freeway corridors where transit alternatives exist, with discounts for carpoolers, low-income residents, and off-peak travel; and reinvest excess revenues into transit alternatives in the corridor.
- T6. Improve interchanges and address highway bottlenecks. Rebuild interchanges and widen key highway bottlenecks to achieve short- to medium-term congestion relief.
- T7. Advance other regional programs and local priorities. Fund regional programs like motorist aid and 511 while supporting local transportation investments on arterials and local streets.
- T8. Build a Complete Streets network. Enhance streets to promote walking, biking and other micro-mobility through sidewalk improvements, car-free slow streets, and 10,000 miles of bike lanes or multi-use paths.
- T9. Advance regional Vision Zero policy through street design and reduced speeds. Reduce speed limits to between 20 and 35 miles per hour on local streets and 55 miles per hour on freeways, relying on design elements on local streets and automated speed enforcement on freeways.
- T10. Enhance local transit frequency, capacity and reliability. Improve the quality and availability of local bus and light rail service, with new bus rapid transit lines, South Bay light rail extensions, and frequency increases focused in lower-income communities.

- T11. Expand and modernize the regional rail network. Better connect communities while increasing frequencies by advancing the Link21 new transbay rail crossing, BART to Silicon Valley Phase 2, Valley Link, Caltrain Downtown Rail Extension and Caltrain/High-Speed Rail grade separations, among other projects.
- T12. Build an integrated regional express lanes and express bus network. Complete the buildout of the regional express lanes network to provide uncongested freeway lanes for new and improved express bus services, carpools and toll-paying solo drivers.

Regional Active Transportation Plan

The Bay Area's Regional Active Transportation Plan was adopted by MTC in 2022 and was intended to guide regional investments to help achieve the goals identified in Plan Bay Area 2050. The Crystal Springs Road corridor was identified as the primary active transportation corridor in the Town that was included in the regional active transportation network. The other major corridor in the area that would impact people traveling to and from Hillsborough is El Camino Real.

County

San Mateo County Congestion Management Program 2021

The City/County Association of Governments of San Mateo County (C/CAG) is the designated Congestion Management Agency (CMA) for San Mateo County. In accordance with California Government Code Section 65088, each CMA is required to prepare and adopt a Congestion Management Program (CMP) on a biennial basis. The CMP includes monitoring and evaluation of LOS along the designated CMP network, which includes segments of I-280 and Skyline Boulevard (SR 35) in Hillsborough. Other CMP roadways located near Hillsborough include US 101, El Camino Real, and SR 92. With the updating of CEQA per the requirements of SB 743, maintenance of LOS standards is no longer part of the environmental review process, though it remains a policy issue for C/CAG.

Countywide Bicycle and Pedestrian Plan

The Countywide Bicycle and Pedestrian Plan (CBPP) provides a framework to help C/CAG improve walking and bicycling conditions in San Mateo County. By recommending a connected network of biking and walking facilities based on the best practices in the field, this Plan will make biking and walking safer and more comfortable for all, and improve health, accessibility, and livability throughout the county. In Hillsborough, the existing Class III bike route on Crystal Springs Road from Polhemus Road to I-280 is a part of the CBPP backbone network of countywide bikeways. The Plan proposes widening the shoulders along this segment to upgrade bicycling conditions along this facility. In addition, a Class I multi-use path is proposed along the same corridor from El Cerrito Avenue to Polhemus Road. Existing and planned bicycle facilities are shown in Figure 4.14-3.

C/CAG Transportation Demand Management (TDM) Policy

The C/CAG TDM Policy provides guidelines regarding analysis of the transportation impacts of development projects in municipalities in San Mateo County. Unless exempted from the policy, local jurisdictions are required to notify C/CAG of any incoming development that is estimated to generate at least 100 Average Daily Trips. For affected projects, applicants are required to complete a TDM checklist and implement measures to reduce the estimated number of trips

and their adverse effects on traffic operations. The type and magnitude of TDM measures are based on the land use type and project size.

Local

Hillsborough General Plan

The Circulation Element of the Hillsborough General Plan includes several objectives, policies and programs addressing traffic, roadways, transit, and bicycle and pedestrian facilities. The Circulation Element emphasizes the efficient use of the Town's existing roadway capacity while maintaining the rural feel of the community. Hillsborough is mainly comprised of small, curvilinear residential streets, with few direct cross-town connections or connections to the external regional roadway system. The following are select policies and actions identified in the Circulation Element that apply to the proposed Project. These policies include Complete Streets policies that were adopted by the Town as a General Plan Amendment in 2015.

Policy C-1.1 - Maintain public roadways in good condition to minimize the potential for automobile accidents and reduce wear and tear on vehicles.

Policy C-1.2 - Install additional street safety improvements, where feasible, within areas where traffic creates public safety problems.

Policy C-1.3 - Provide for adequate sight distance at all intersections and driveways where feasible, including areas experiencing high parking rates due to construction projects and events.

Policy C-1.4 - Promote safe motor vehicle, pedestrian and bicycle activities to avoid situations that may result in accidents.

Policy C-1.5 - Maintain adequate emergency access for all land uses.

Policy C-2.5 - Encourage the public and private schools to expand ridesharing activities to help reduce school-generated vehicle traffic around the schools.

Policy C-3.2 - Continue to require property owners who are building a new house or remodeling/adding more than 50 percent to the living area of an existing house, to install parking strips, as a means to provide safer on-street parking. Once updated, parking strip requirements will reflect the need to continue to require parking strips in areas where the strips provide needed parking and safety, such as:

- Narrow streets where on-street parking without a parking strip may obstruct the flow of traffic.
- Areas near to major pedestrian destinations, such as schools and parks, where parking strips provide off-street pedestrian routes. In addition to affirming areas where parking strips should continue to be required, the updated parking strip requirement will incorporate additional opportunities for flexibility, such as reducing or waiving the parking strip requirements. Opportunities where flexibility may be appropriate include:

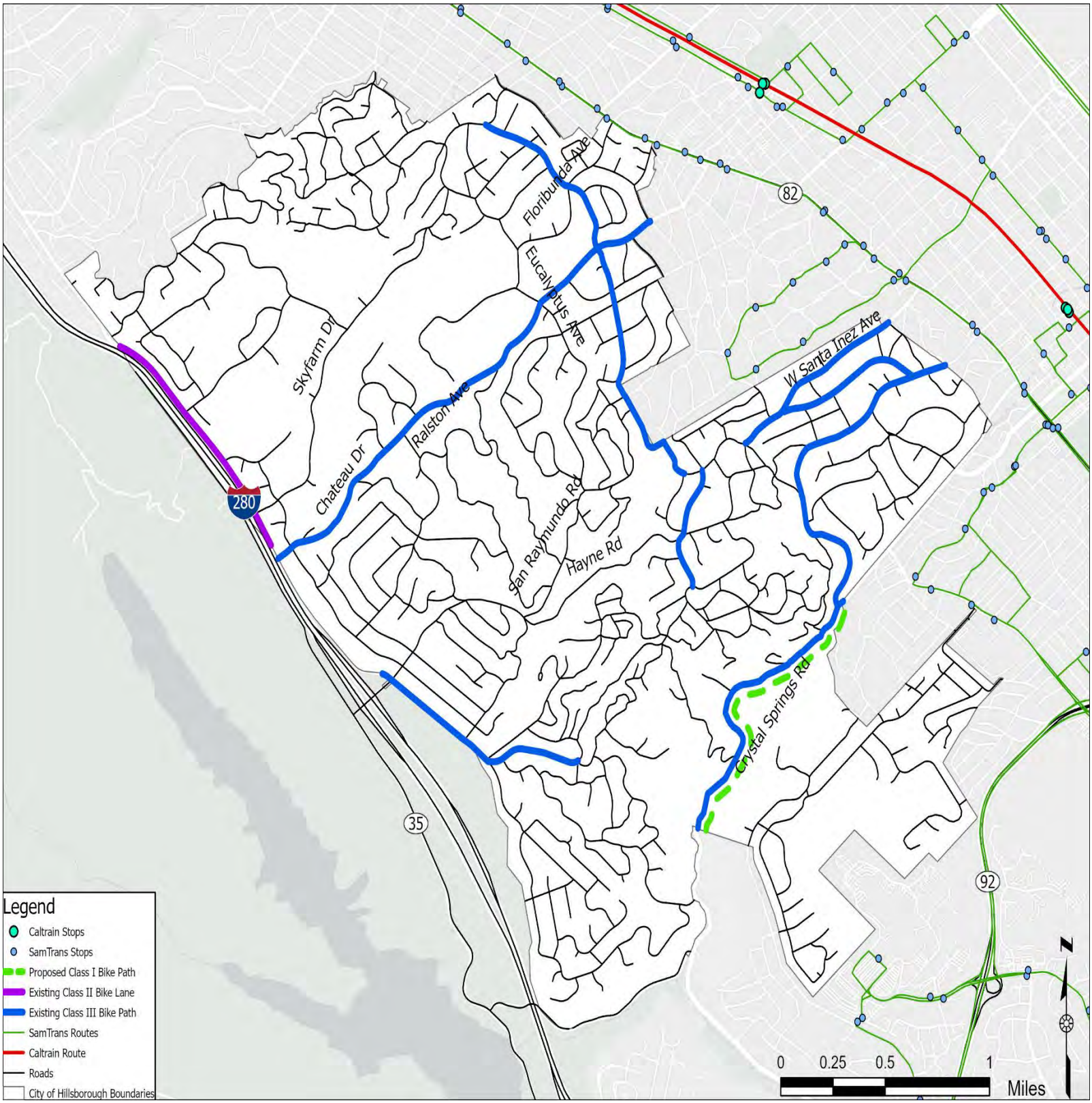


Figure 4.14-3 Bicycle and Pedestrian Facilities

- Non-residential properties where adequate off-street parking is available for visitors and where there are little or no adjacent residential uses that will generate the need for parking.
- Properties located on streets with little demand for parking and where parking strips on only a portion of the street frontage will provide adequate opportunities for safe, on-street parking.

Policy C-4.1 - Work with the public and private schools to promote safe driving and pedestrian circulation around or near the schools.

Policy C-4.2 - Work with residents to identify appropriate locations for the provision of off-street pedestrian routes, such as on Town-owned open space areas, large properties when subdivided, and as a feature of parking strips.

Action C-4.1 - The Town will coordinate with the school district and other entities to develop "Suggested Routes to School Plans" for all public and private schools in the Town. Plans shall identify all pedestrian and bicycle facilities, and traffic control devices for residents to determine the most appropriate travel routes. The plans shall also identify existing easements for potential use for off-street pedestrian pathways.

Policy C-5.1 - Continue to cooperate with San Mateo County, C/CAG and bicycle organizations in the planning and implementation of a countywide bicycle system which will traverse and connect with Hillsborough.

Policy C-5.2 - Encourage the provision of bicycle facilities in areas that provide adequate space and separation from automobiles without negatively impacting biologically sensitive areas.

Action C-5.1 - The Town will pursue the creation of an off-street bicycle trail along Crystal Springs Road, consistent with the County's Trails Plan and Bicycle Route Plan. In this effort, the Town will work with current property owners, including the SFPUC, to incorporate the trail into future development along the route. The Town will recommend that the County of San Mateo research, identify, and compete for available funding to assist with the completion of the trail. Hillsborough will also request the County of San Mateo and C/CAG to study feasible alignments that would avoid negatively impacting sensitive biological resources located along San Mateo Creek.

Action C-5.2 - The Town will develop a community awareness program to encourage local use of safer bicycle routes, including referring residents to the C/CAG Bicycle and Pedestrian Advisory Committee's bicycle route map. The Town will include bicycle and pedestrian safety and enforcement when developing community awareness programs.

Goal C-6 - Create and maintain "Complete Streets" that provide safe, comfortable, and convenient travel along and across streets through a comprehensive, integrated transportation network that serves all categories of users, including pedestrians, bicyclists, persons with disabilities, motorists, movers of commercial goods, users and operators of public transportation, seniors, children, youth, and families. Examples of improvements created may include wheelchair ramps, crosswalks, bicycle lanes, walkways, and road diets.

Policy C-6.1 - Context Sensitivity. In planning and implementing street projects, departments and committees of the Town of Hillsborough shall maintain sensitivity to local residential

communities and shall work with residents and other stakeholders to ensure that a strong sense of place ensues. Improvements that may be considered include walking paths, shared use paths, bicycle lanes, bicycle routes, paved shoulders, street trees and landscaping, planting strips, accessible curb ramps, crosswalks, traffic islands, signs, street furniture, bicycle parking and other features assisting in the provision of safe travel for all users.

Policy C-6.2 - "Complete Streets" Routinely Addressed by All Departments. All relevant departments and committees of the Town of Hillsborough shall work towards making Complete Streets practices a part of everyday operations, approach every relevant project, program, and practice as an opportunity to improve streets and the transportation network for all categories of users, and work in coordination with other departments, agencies, and jurisdictions to maximize opportunities for "Complete Streets", connectivity, and cooperation. The following projects provide opportunities: pavement resurfacing, restriping, underground utilities, signalization operations or modifications, and installation of landscaping/related features.

Action C-6.1 - All Projects and Phases. "Complete Streets" infrastructure sufficient to enable reasonably safe travel along and across the right of way for each category of users shall be incorporated into relevant planning, funding, design, approval, and implementation processes for construction, reconstruction, retrofit, or substantial alteration of streets (including streets, roads, bridges, and other portions of the transportation system).

Action C-6.2 - Plan Consultation and Consistency. Maintenance, planning, and design of projects affecting the transportation system shall be consistent with local bicycle, pedestrian, transit, multimodal, and other relevant plans, except that where such consistency cannot be achieved without negative consequences, consistency shall not be required if the head of the relevant department provides written approval explaining the basis of such deviation.

Action C-6.3 - Street Network/Connectivity. As feasible, the Town of Hillsborough shall incorporate "Complete Streets" infrastructure into existing streets to improve the safety and convenience of users, with the particular goal of creating a connected network of facilities accommodating each category of users, and increasing connectivity across jurisdictional boundaries, and for existing and anticipated future areas of travel origination or destination.

4.14.3 Thresholds of Significance

Per the CEQA guidelines, the proposed Project would have a significant impact related to transportation if it will:

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.

Regarding VMT impacts, the Town has not adopted a VMT policy or thresholds of significance. As a result, this analysis applies the approach recommended in the OPR guidance.

4.14.4 Impacts and Mitigation Measures

The proposed Project consists of updates to the existing 2014 - 2022 Housing Element to reflect the 6th cycle 2023 – 2031 housing assignments. In addition, associated amendments to the Land Use Element and General Plan Land Use Map, Open Space and Conservation Element, and Public Safety Element; amendments to Title 17 (Zoning) of the Hillsborough Municipal Code, and amendments to the Hillsborough Zoning Map are proposed for consistency of all Town documents, codes, and regulations. These associated amendments are generally described in sections 3.3.9 through 3.3.12 in the Project Description and would not result in environmental impacts related to transportation. Therefore, they are not discussed further in this chapter. The impact analysis focuses on the residential development that would be facilitated by the Draft 2023 – 2031 Housing Element.

Vehicle Miles Traveled (VMT) Methodology

This section provides a background on VMT and describes the methodology used to assess the potential VMT impacts that could result from the Focused GPU.

VMT Background. VMT represents a number of daily miles driven and is calculated by multiplying the number of trips by trip lengths. VMT can be expressed in different ways including total VMT, which is an aggregate value measured in miles, and VMT per capita, which is a performance metric measured in the number of miles driven per person. Many factors affect VMT including the average distance residents commute to work, school, and shopping, as well as the proportion of trips that are made by non-automobile modes (transit trips or walking/bicycling). Areas that have a diverse land use mix and ample facilities for non-automobile modes of travel, including transit, tend to generate lower VMT than auto-oriented suburban areas. The Town of Hillsborough does not have any transit options within the Town limits and has limited sidewalks and bicycle routes.

(C/CAG-VTA) Countywide Model. The analysis of the Housing Element's potential transportation impacts was based on an assessment of applicable policies and a quantitative evaluation of VMT. The Project VMT was assessed using the most recent version of the City/County Association of Governments of San Mateo County-Santa Clara County Valley Transportation Authority (C/CAG-VTA) Countywide Model. The model is based on the transportation network assumptions from Plan Bay Area 2040 (the Bay Area's Regional Transportation Plan/Sustainable Communities Strategy) and the corresponding population, housing and employment forecasts developed by ABAG. The transportation analysis zones (TAZs) associated with the model were determined for each of the housing opportunity sites and the proposed number of units were assigned to the corresponding zones.

Since this is a program-level analysis, VMT per capita for the Project was determined based on the total number of proposed housing units and the TAZs where the sites are located. Of the potential 605 (RHNA + buffer) units included in the Draft 2023 – 2031 Housing Element, 400 are assumed to be ADUs. Since the owners of most single-family residential lots could potentially construct an ADU on their properties, specific sites could not be identified for this analysis. Therefore, locations were assumed to be distributed throughout the Town, with the units being

allocated to each TAZ proportionally, based on the number of existing and planned residential units. Given that relatively few residents would live within walking distance of transit services, the inability to provide precise locations of new ADUs would have only a nominal impact on VMT, as the land use and transportation context would not be expected to result in a substantial shift in transportation modes or trip lengths.

In addition to the VMT per capita provided at the Town level, VMT information was provided at the TAZ level for informational purposes. The data generated from the C/CAG-VTA model was also used to generate information regarding the Project's impact on greenhouse gas emissions and noise, which are analyzed elsewhere in this EIR.

The following scenarios were analyzed:

- Existing Conditions (2020): Reflects current conditions without the Project (proposed Hillsborough Housing Element).
- Existing plus Project (2020): Adds buildout of the proposed Hillsborough Draft 2023 – 2031 Housing Element to existing conditions.
- Cumulative (2040): Reflects future conditions including regional growth and buildout of the current General Plan.
- Cumulative plus Project (2040): Adds buildout of the proposed Hillsborough Draft 2023 – 2031 Housing Element to the Cumulative scenario.

VMT Performance Metric. The OPR Technical Advisory states that the VMT significance threshold for residential projects should be established using the citywide or regional average VMT per capita. VMT per capita considers only home-based vehicle trips (trips that either begin or end at a place of residence). While the region in this case is defined as the nine-county Bay Area, many incorporated cities establish their residential VMT significance threshold using an intermediate geographical area based on the countywide average instead of the citywide or regional average.

For the Hillsborough Focused GPU, the countywide average was used to determine the residential VMT threshold for the proposed Project for two key reasons. First, the proposed Project affects sites throughout the Town of Hillsborough, so comparing its VMT effects to the Town average could make results difficult to discern; using the San Mateo countywide average provides a much clearer comparison of how Hillsborough's vehicle travel patterns relate to its surrounding area. Second, comparing the Project's residential VMT to the Bay Area regional average is overly-conservative as the regional average heavily "weights" travel patterns occurring in major metropolitan areas including San Francisco and Oakland that have especially robust transit systems; again, using the San Mateo countywide average provides a much clearer and more appropriate comparison to the surrounding area's physical environment and land use context.

Per OPR Technical Advisory guidance, a residential project exceeding a level of 15 percent below the existing average VMT per capita is considered to have a significant transportation impact. The existing average San Mateo countywide VMT per capita is 15.5 miles, as reported from the C/CAG-VTA model used in this analysis, which has a base year of 2020. The applicable residential VMT significance threshold is therefore 15 percent below this value, or 13.2 VMT per capita.

Screening. CEQA allows for the use of screening thresholds or criteria to identify certain types of projects that can be expected to cause a less-than-significant impact without needing to conduct a detailed analysis (State CEQA Guidelines sections 15063(c)(3)(C), 15128, and the environmental checklist included in CEQA Appendix G). The OPR Technical Advisory suggests that lead agencies use such criteria to "screen out" VMT impacts for qualifying projects and includes descriptions of several screening types. Following are the screening criteria identified in the OPR Technical Advisory that may pertain to residential projects:

- Small Project Screening: Projects that generate or attract fewer than 110 trips per day may be presumed to have a less-than-significant impact; this translates to approximately 11 single family homes or 16 to 24 multifamily apartments (depending on density).
- Map-Based Screening: Projects located within areas that have been mapped by jurisdictions as being low-VMT areas, as evidenced through quantified VMT data. While such VMT data is available from the C/CAG-VTA model, the Town of Hillsborough has thus far not produced formal VMT screening maps, so this measure does not currently apply.
- Screening of Sites Near Major Transit Stops: Projects located within one-half mile of a major transit stop as defined in Public Resources Code 21064.3. In Hillsborough the only locations qualifying are those within one-half mile of bus stops along El Camino Real. Note that screening of such sites also requires floor area ratios (FAR) to be 0.75 or greater, parking supplies that do not exceed code requirements, and consistency with Plan Bay Area.
- Affordable Residential Development Screening: Projects containing 100 percent affordable residential development in infill locations, or locations where a jobs/housing imbalance exists and affordable housing would be expected to result in shorter commute trips.

Analysis of Impacts

Impact TRANS-1 – Conflict with Adopted Policies, Plans, or Programs Regarding Roadways, Public Transit, and Bicycle and Pedestrian Facilities. *[Thresholds of Significance (a)]*

The proposed Project would result in an increased number of residents, which would therefore increase usage of the transportation system. Since the proposed units would generally be distributed throughout Hillsborough, it is anticipated that overall, the transportation mode split for the new units would be similar to the patterns elsewhere in the Town. The Town's General Plan includes complete streets-oriented policies and actions to serve the needs of all transportation modes, particularly through Policy C-6.1 (Context Sensitivity), Policy C-6.2 ("Complete Streets" Routinely Addressed by All Departments), Action C-6.1 (All Projects and Phases), Action C-6.2 (Plan Consultation and Consistency), and Action C-6.3 (Street Network/Connectivity).

The General Plan also includes several policies to address school-related circulation issues, including Policy C-4.1, Policy C-4.2, and Action C-4.1. Regarding bicycle circulation, Policy C-5.1, Policy C-5.2, and Action C-5.1 support the development of bicycle facilities to serve the demand for bicycle trips to, from, and within Hillsborough. Through the inclusion of these policies and actions, the Town would continue to modify the circulation system to accommodate the circulation needs associated with the development proposed in the Housing Element. The

adequacy of the existing and planned infrastructure needed to support additional pedestrian, bicycle, and transit travel would need to be assessed for individual proposals.

The Focused GPU would not conflict with policies, plans, or programs regarding roadways, bicycle and pedestrian facilities, and public transit, and individual developments will be reviewed as part of the project level development review to determine necessary transportation improvements. Therefore, with respect to potential conflicts with circulation system policies, the impact of the proposed Project would be ***less than significant***.

Impact TRANS-2 – Impacts Related to Vehicle Miles Traveled. *[Thresholds of Significance (b)]*

The VMT associated with the Project was estimated using the C/CAG-VTA travel demand model. Estimates of Existing VMT and Existing plus Project (including VMT generated by the Draft 2023 – 2031 Housing Element) are presented in Table 4.14-1, including a comparison between Town of Hillsborough, San Mateo County, and Bay Area estimates of VMT per capita. While the San Mateo countywide VMT per capita was used to reach a significance determination, the Bay Area average is included for informational purposes.

Table 4.14-1: 2020 Daily VMT per Capita

Scenario	Households	Population	Household VMT	VMT/Capita
Existing (2020)				
Town of Hillsborough	3,750	11,410	239,708	21.0
San Mateo County	270,931	780,949	12,116,258	15.5
Bay Area	2,766,235	7,738,775	124,598,534	16.1
Existing Plus Project (2020)				
Town of Hillsborough	4,357	12,802	274,015	21.4
San Mateo County	271,538	782,341	12,359,957	15.8
Bay Area	2,766,842	7,740,167	124,966, 686	
15% Below San Mateo County Existing VMT per Capita = 13.2				

The VMT Threshold of Significance is 15% below the San Mateo County Existing VMT per Capita number which is 13.2 VMT per capita. When considered at the TAZ level, the 2020 VMT per capita generated by the proposed Project exceeds the significance threshold for all zones where residential development is proposed, with a VMT per capita ranging from 19.3 to 22.6 (Table 4.14-2). To achieve a VMT per capita below the significance threshold would require VMT reductions ranging from 31.6 to 41.6 percent. Table 4.14-2 summarizes the VMT assessment by TAZ.

Table 4.14-2: Transportation Analysis Zones, Proposed Housing Units, and Vehicle Miles Traveled (VMT)			
Transportation Analysis Zone (TAZ)	**Proposed Housing Units**	**2020 VMT per Capita**	**VMT Reduction Needed to Reach Significance Threshold (13.2 VMT per Capita)**
1534	70	19.3	31.6%
1535	141	19.9	33.7%
1608	96	21.2	37.7%
1609	88	20.0	34.0%
1952	124	22.2	40.5%
1954	88	22.6	41.6%
Source: C/CAG-VTA Model, Kittelson & Associates, Inc., 2023			

Based on the VMT presented in Table 4.14-2, the proposed Project would have a significant impact and requires mitigation.

The applied VMT threshold of significance is established using data for San Mateo County, consistent with guidance provided by OPR. Cities and counties with major urban centers perform very favorably from a VMT perspective as high-population centers also heavily weight the calculation of per capita regional VMT. In contrast, cities and counties that have less dense development patterns and are further from the core regional population and employment centers have average per capita VMT levels that are well above the regional average and significance threshold. Further, within these higher-VMT counties, many of the areas with the highest VMT levels are in unincorporated portions of a county or a very rural city where fewer non-auto travel options exist. For these reasons, it is extremely difficult for residential development projects in communities such as Hillsborough to achieve VMT significance thresholds that are set using a regional average. This difficulty is demonstrated by the significant VMT impact described above for the proposed Project.

Cumulative Impacts

The proposed Housing Element's VMT significance was determined by comparing Existing plus Project conditions to countywide VMT significance thresholds based on a VMT per capita performance metric, as presented above. As the OPR Technical Advisory states, "A project that falls below an efficiency-based threshold that is aligned with long-term environmental goals and relevant plans would have no cumulative impact distinct from the project impact." While not used in this analysis for the purposes of establishing impact significance, the Cumulative 2040 plus Project VMT per capita associated with the 605 (RHNA + buffer) units in all candidate sites was projected using the C/CAG-VTA model. The results indicate that the 2040 plus Project residential VMT per capita in the Town would be 20.7 miles, which is lower than the 2020 plus Project level of 21.4 miles. This suggests that residential VMT per capita in Hillsborough is anticipated to trend favorably and decrease over time. It would, however, remain well above the

countywide significance threshold of 13.2 VMT per capita. The Cumulative and Cumulative plus Project VMT are summarized in Table 4.14-3.

Table 4.14-3: 2040 Daily VMT Summary – VMT per Capita

Scenario	Households	Population	Household VMT	VMT/Capita
Cumulative (2040)				
Town of Hillsborough	3,750	11,410	232,605	20.4
San Mateo County	322,262	928,680	13,854,796	14.9
Bay Area	3,422,998	9,661,841	155,608,517	16.1
Cumulative Plus Project (2040)				
Town of Hillsborough	4,357	12,802	264,461	20.7
San Mateo County	322,869	930,072	13,873,438	14.9
Bay Area	3,423,605	9,663,233	155,697,639	16.1
15% Below San Mateo County Existing VMT per Capita = 13.2 Source: C/CAG-VTA Model, Kittelson & Associates, Inc., 2023				

The San Mateo countywide VMT per capita under Existing conditions (2020) is 15.5 miles. The VMT Significance Threshold used in this EIR is 15% below the San Mateo countywide Existing VMT per capita or 13.2 VMT per capita. The Existing plus Project VMT per capita is estimated to be 21.4 miles, which is 62 percent above the countywide threshold. Therefore, the impact of the proposed Project with respect to VMT is ***significant and requires mitigation***.

Mitigation Measure

Impact TRANS-1: The Project would generate VMT that, per capita is estimated to be 21.4 miles, which is 62 percent above the countywide threshold.

Mitigation Measure TRANS-1: VMT Reduction. Residential development projects occurring on sites identified in Draft 2023 – 2031 Housing Element programs shall be required to achieve a VMT significance threshold of 15 percent below the countywide average residential VMT per capita. This is generally considered the maximum feasible mitigation that can be achieved in suburban contexts, according to *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity*, California Air Pollution Control Officers Association (CAPCOA), 2021 (CAPCOA report). For individual development projects that do not achieve VMT significance thresholds, the Town shall develop a standard process where applicants shall submit documentation that demonstrates how the necessary VMT reductions will be achieved.

VMT Reduction Strategies

Project-specific VMT reduction strategies would be identified as part of specific project proposals, and the selected strategies will vary depending on the location of each development site and the availability of nearby transportation services. The CAPCOA report contains transportation-focused measures – including transportation demand management (TDM)

strategies – for the purpose of reducing VMT, including VMT reduction estimates associated with each strategy. Following are TDM and other strategies that may be applied; additional measures beyond those provided in this list may be allowed if supported by evidence.

- Subsidize transit passes;
- Provide or participate in established ride-matching program(s);
- Provide information, educational, and marketing resources for residents, employees, and visitors managed by a TDM Coordinator;
- Construct off-site pedestrian and/or bicycle network improvements, particularly those that fill gaps and/or connect the project and surrounding neighborhood to transit;
- Reduce parking supply at affordable or senior residential projects and projects that are well-served by transit;
- Unbundle residential parking costs (sell or lease parking separately from the housing unit) where appropriate on-street management is present.

As noted, the lack of availability of transit services in proximity to the Planning Area will impact the VMT reduction that can be achieved through some of these strategies. Therefore, projects located in proximity to the frequent bus service operating along El Camino Real and/or Caltrain would offer residents viable alternatives to vehicle transportation. However, programs administered through Commute.org are available to all San Mateo County residents and include ridesharing, a guaranteed ride home program, and incentives to use non-vehicle transportation. Marketing efforts for these measures would support VMT reduction for residents of the proposed units as well as existing Hillsborough residents.

Significance with Mitigation

Implementation of this mitigation measure would reduce the VMT impacts associated with future development projects but would not fully mitigate these impacts due to several factors.

- Project screening: The OPR Technical Advisory recommends applying screening criteria to projects that can be presumed to have a less than significant VMT impact. Among the screening criteria are projects estimated to generate fewer than 110 trips per day based on standard trip generation rates published by the Institute of Transportation Engineers. This equates to projects with 11 or fewer single-family homes or 15 or fewer townhomes or low-rise apartments. If small project screening is applied, this would impact most of the proposed residential units in the Draft 2023 – 2031 Housing Element. For example, of the proposed 605 residential units included in the Draft 2023 – 2031 Housing Element, 400 (66 percent) are ADUs. Another 23 units are one single-family house.
- Lack of project-specific details: The proposed Project is programmatic in nature, and specific project proposals have not been developed. Specific development plans defining the size, configuration, and characteristics of potential future development projects could potentially result in VMT projections that differ from those reflected in the C/CAG-VTA modeling completed for this analysis, but site-specific information about future development projects is not available at this time. Because VMT performance is sensitive to these factors, it is not currently possible to conclusively determine VMT performance metrics and the effectiveness of project-level VMT reduction strategies for individual sites or for the Draft 2023 – 2031 Housing Element sites as a whole.

- Lack of certainty regarding VMT reductions: There is uncertainty about the ability for development projects on all project sites to achieve the required VMT reductions—particularly those projects on sites where it is infeasible to provide new or more frequent transit service and few alternative VMT reduction strategies are viable, at least until such time that VMT mitigation fee programs, banks, or exchanges can be established.

Given the inability to assure that the residential VMT per capita associated with the proposed Project would be reduced to a less than significant level despite required VMT reduction strategies, this impact would be ***significant and unavoidable***.

The program-level VMT impact described above does not preclude the finding of a less-than-significant impact for future development projects that achieve VMT per capita levels that are below applicable thresholds of significance, including those that qualify for VMT screening as defined in OPR guidance or future VMT policies adopted by the Town of Hillsborough. If all individual developments occurring on the sites identified in the Draf 2023 – 2031 Housing Element are able to achieve the required residential VMT per capita, impacts would be reduced to a less-than-significant level.

Impact TRANS-3 – Hazards Due to Design Features or Incompatible Uses. *[Thresholds of Significance (c)]*

Modifications to the transportation network near the Housing Opportunity Sites identified in the Project would be implemented over time, as would facilities elsewhere in Hillsborough and the surrounding communities. New or upgraded facilities would be designed and constructed to be consistent with local, regional, and federal standards and guidelines; as a result, they would not be expected to introduce hazardous design features.

Housing development projects that include infrastructure improvements such as new streets, driveways, or pedestrian and bicycle facilities would undergo project-level review, and potential hazards would be identified as part of the review process. Potential safety concerns to be evaluated include the adequacy of sight lines at project access points and visibility issues that result from project-related vehicle queues.

Based on the design requirements for new projects and the analysis that would be included as part of project-level review, the impact of the proposed Project with respect to the introduction of hazardous design features would be ***less than significant***.

Impact TRANS-4 – Emergency Access. *[Thresholds of Significance (d)]*

The implementation of the housing units proposed as part of the Focused GPU would not be expected to result in inadequate emergency access. At the project level, each project would be required to meet Town and County standards and requirements and would be reviewed by public safety officials as part of the approval process. Safety, Fire, and Building Codes would be adhered to for all proposed developments included in the updated Housing Element. These requirements include providing two points of ingress/egress for residential projects in high fire hazard areas and roadway and driveway widths and lengths that meet current Fire Code requirements. Further, complying with these standards and requirements is consistent with General Plan Policy C-1.5, which requires maintenance of adequate emergency access.

For any roadways that would be modified as part of the implementation of the proposed housing units, any reduction in vehicular roadway capacity would require an analysis of traffic operations to identify potential impacts to emergency vehicle access; in the event that any such impacts are identified, mitigation measures would be developed to reduce potentially significant impacts to less than significant levels. Compliance with the Town policies and the Fire Code would ensure that future development associated with implementation of the Project would ensure this potential impact would be ***less than significant***.

4.14.5 References

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Plan Bay Area 2050, Metropolitan Transportation Commission and Association of Bay Area Governments, 2021, https://planbayarea.org

SamTrans, https://www.samtrans.com/schedulesmaps

San Mateo County Congestion Management Program 2021, City/County Association of Governments, Draft Report – 2021 San Mateo County CMP (ca.gov)

San Mateo Countywide Bicycle and Pedestrian Plan, 2021, City/County Association of Governments, https://ccag.ca.gov/wp-content/uploads/2021/06/San-Mateo-County-Comprehensive-Bicycle-and-Pedestrian-Plan-Update-Final-Plan.pdf

San Mateo Countywide Transportation Plan 2040, City/County Association of Governments, 2017, https://ccag.ca.gov/programs/countywide-transportation-plan/

Technical Advisory on Evaluating Transportation Impacts Under CEQA, 2018, Governor's Office of Planning and Research, State of California, https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf

Vehicle Miles Travel-Focused Transportation Impact Study Guide, Caltrans, 2020, https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf

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4.15 Utilities and Service Systems

4.15.1 Environmental Setting

Water Supply

The Town operates and maintains a water distribution system to serve its residents and other water users (Town of Hillsborough 2021). Hillsborough receives the entirety of its water supply from the San Francisco Public Utilities Commission's (SFPUC) San Francisco Regional Water System (RWS). The Town's water supply system is complex because of the varying topography within the Town and interconnected zones. The system's principal components are:

- 8 turnouts connected to SFPUC pipelines;
- 15 active pump stations;
- 18 pressure zones, with water pressures ranging from 25 pound per square inch ("psi") in the Tournament Zone to 230 psi in the Marlborough Zone;
- 18 active storage facilities located on 9 sites throughout the Town. Storage tanks and reservoirs are inspected every 3 to 5 years and have cathodic protection to prevent corrosion and mixers to circulate water;
- 108 miles of water mains, with over 50 percent of the mains older than 50 years; and
- 4,304 service connections to the water system and 1,013 fire hydrants. Nearly all the water used in Hillsborough (91%) is sold to single-family homes, with the remainder delivered to two golf courses, six schools, and Town operational use.

Hillsborough is predominantly a single-family residential community with a small number of commercial, landscape, and institutional/governmental customer accounts. Hillsborough has approximately 4,304 municipal connections. Residences account for 97% of total metered connections (4,194 connections) and 91% of total consumed water volume. Water consumption in the Town in 2020 was 2,819 acre-feet (AF),[46] with residential customers accounting for 91 percent of the total consumption.

San Francisco Public Utilities Commission (SFPUC)

As described in the Hillsborough 2020 Urban Water Management Plan (UWMP), the sole source of water supply to the Town is treated water purchased from the City and County of San Francisco's Regional Water System (RWS), which is operated by the SFPUC (Town of Hillsborough 2021). The RWS serves over 2.7 million people and draws 85% of its supply from the Tuolumne River watershed, collected in the Hetch Hetchy Reservoir in Yosemite National Park.

Hillsborough has an individual supply guarantee (ISG) of 4,858 AF per year from the SFPUC during normal water years (Table 4.15-1). According to the Town's 2020 UWMP, Hillsborough's ISG is more than enough water to meet Hillsborough's maximum projected water demand through 2045.

[46] The Town's total water purchases in 2020 totaled 2,982 AF. Losses comprise the difference between 2020 total consumption (2,819 AF) and total purchases (2,982 AF). As such, the Town experienced water losses totaling 163 AF in 2020.

Table 4.15-1: Projected Potable and Non-Potable Water Use					
	Projected Water Use (AF)				
Use Type	2025	2030	2035	2040	2045
Single Family	3,110	3,261	3,244	3,222	3,204
Commercial	13	13	13	12	12
Institutional/Governmental	42	45	45	45	45
Landscape	61	61	59	57	57
Losses	338	358	355	353	351
Total	**3,564**	**3,738**	**3,715**	**3,689**	**3,669**
Note: Demands include passive (plumbing code) and active conservation. Source: Town of Hillsborough Urban Water Master Plan, 2020					

Issues arise however when Hillsborough's projected water demand is compared to projected water supply during water shortage events. In particular, the adoption of the Bay Delta Plan Amendment in 2018 by the State Water Resources Control Board requires the release of 40 percent unimpaired flow on the Tuolumne River from February through June each year. The SFPUC projects that the implementation of the Bay Delta Plan will require water rationing in single- and multiple- dry year events. Specifically, SFPUC projects dry year supply shortfalls of between 45 percent to 54 percent compared to projected wholesale water demand between 2025 – 2045 during a multiple (5-year) drought.

Hillsborough predicts similar dry year supply shortfalls (44 percent – 54 percent) compared to its projected demand during a multi-year shortage event if the Bay Delta Plan is implemented. By comparison, during the 2014 – 2017 drought, Hillsborough faced a 36 percent state mandated cutback against baseline (2013) water demand, implemented water rationing, and achieved a 41 percent reduction in use (2015/16). Hillsborough's projected dry year water supply is based on a Revised Tier 2 Drought Allocation that allocates water supply evenly against all Bay Area Water Supply and Conservation Agency (BAWSCA) jurisdictions when RWS water supply shortages are greater than 20 percent. This approach was taken by BAWSCA to address the Bay Delta Plan's dry year supply shortage scenarios provided by the SFPUC in 2021. The Tier 2 allocation plan will be negotiated in 2021 – 2022, and Hillsborough will likely be allocated less water since the Tier 2 supply formula considers seasonal water (e.g., outdoor water use) and residential per capita use (which is high in Hillsborough compared to most of the other BAWSCA member agencies).

Hillsborough has developed a Water Shortage Contingency Plan to address potential water shortage conditions. Hillsborough's WSCP is presented as a stand-alone strategic planning document designed to prepare for and respond to water shortages. It provides a structured guide with three important elements describing Hillsborough's planned response to water shortage events:

1. Shortage Level: Hillsborough has six reduction stages, with shortage levels that increase by 10 percent per level.

2. Demand Reduction Actions: For each Shortage Level, Hillsborough has numerous demand reduction actions to reduce water demand.

3. Historical Drought Response 1987 – 2016: Hillsborough provides a historical record of its responses to three major drought events; provided as Appendix A to the WSCP.

Hillsborough implements several water demand management measures, including participation in the BAWSCA's Regional Water Conservation Program. Hillsborough's other demand management measures include:

- Water waste prevention ordinances, including its Water Efficiency in Landscaping Ordinance and its water waste prevention requirements in Chapter 13.16.070 in Hillsborough's municipal code;
- Conservation pricing, including tiered water rates;
- Public education outreach, including conservation messaging in Hillsborough e-announcements, newsletter articles, and direct mailers;
- WaterSmart, Hillsborough's customer service portal, which provides its customers with hourly water use data, leak alerts, and water conservation guides and videos;
- Water audits and water distribution leak surveys; and
- Other demand management measures.

Sanitary Sewer Service

The Hillsborough Public Works Department provides wastewater collection service for Hillsborough. The Town's wastewater collection system service area is approximately 6.1 square miles and consists of steep terrain with slopes mostly greater than ten percent (Akel Engineering 2023). Based on the natural topography, the Town has a west to east slope towards the neighboring cities and is divided into North and South sewersheds along Hayne Road.

The Town provides wastewater collection services to over 4,000 customers consisting mostly of residential customers and few commercial and institutional users (Akel Engineering 2023). The collection system is separated into two independent sewersheds along Hayne Road. The North sewershed has a service area of approximately 2.9 square miles and is tributary to the City of Burlingame whereas the South sewershed has a service area of approximately 3.2 square miles and is tributary to the City of San Mateo.

The Town owns, operates, and maintains a wastewater collection system comprised of 94 miles of gravity pipes and force mains, and 4 lift stations (Akel Engineering 2023). Gravity pipes with a diameter of 6-inch and 8-inch account for approximately 90 percent of the total system length. Wastewater flows from the Town are conveyed to the City of Burlingame and the City of San Mateo through connection points located along the east boundary. Sewage collected from the Town is ultimately conveyed to the City of Burlingame and the City of San Mateo Wastewater Treatment Plants (WTTPs) for treatment and disposal. The City of Burlingame WWTP has an existing design capacity of 16 million gallons per day (mgd). The San Mateo WWTP has an existing design capacity of 40 mgd. The City of San Mateo is planning to increase plant capacity to 78 mgd as part of the City's Clean Water Program.

The Town adopted two Wastewater Collection System Master Plans (WCSMPs) in 2011, which separated the municipal system into North and South sewersheds. Wastewater flows collected

from the North sewershed are tributary to the City of Burlingame, whereas flows from the South sewershed are tributary to the City of San Mateo. Both Master Plans were previously updated in 2014 with recommendations to reduce rainfall dependent infiltration and inflow (RDII), and address capacity deficiencies in the collection system. The objective of the Town's recent 2023 Wastewater Collection System Master Plan Update is to incorporate recently constructed projects, quantify RDII, and evaluate the capacity adequacy of the Town's current system (Akel Engineering 2023).

Stormwater Management

The Town of Hillsborough's storm drain system includes 2,500 catch basins and storm drain inlets, manholes, pipes, conveyance channels, creeks, ditches, pump stations (Town of Hillsborough 2023). The Town's storm drain system handles runoff from Hillsborough's approximately 96 miles of streets and the four watersheds within which the Town is located. The watersheds, from north to south, include Mills Watershed, Sanchez Watershed, San Mateo Watershed, and Pulgas Watershed. The Town drains from west to east towards San Francisco Bay (BKF Engineers 2015). Most of the Town stormwater drainage is conveyed by creeks. There are seven primary drainage systems. The largest system is San Mateo Creek, with a drainage area of approximately 33 square miles at El Camino Real crossing. Flow to San Mateo Creek is detained within the Crystal Springs Reservoir system. The other six drainage systems include Easton Creek, Sanchez Creek, Terrace Creek, Ralston Creek, Burlingame Creek, and Borel Creek. Because most runoff from the Town is conveyed by creeks, storm drain systems tend to have short runs.

The Hillsborough Storm Drain Master Plan provides prioritized recommendations for Town storm drain system repairs and additions necessary to reduce storm drain system deficiencies (BKF Engineers 2015). The Town's existing storm drain system consists largely of piecemeal installations, with individual systems or pipe segments being installed as each development within Town boundaries occurred. Many segments do not meet current (as of 2015) standard storm drainage design criteria. Other segments that are hydraulically adequate may be structurally deficient due to aging. The Storm Drain Master Plan identified existing system deficiencies and concerns related to CMP pipes, RCP pipes, manholes, catch-basins, headwalls, creeks, and sewer inflow. The Storm Drain Master Plan calls for a more comprehensive plan to be prepared that will identify and characterize recommended improvements to allow the Town to gradually upgrade deficient system components. The timing of system improvements will be presented in a Capital Improvements Program that will be used to guide drainage improvements over 30 years. The Storm Drain Master Plan recommends the Town should implement the prioritized system of storm drain improvements presented in the forthcoming 30-year Master Plan. The first priority for system upgrade is the replacement or repair of failing corrugated metal pipes and reinforced concrete pipes where there is joint separation. The Storm Drain Master Plan recommends repair when the storm drain system has adequate flow capacity for a 25-year storm event and replacement is necessary where the pipes are found to be undersized.

The Town has developed a Green Infrastructure Plan to gradually shift the Town's traditional "gray" storm drain infrastructure—which channels polluted runoff directly into receiving waters (like creeks) without treatment—to a storm drain system comprised of "green" infrastructure, which captures, stores, and treats stormwater using specially designed systems (Town of

Hillsborough 2019). The Town's Green Infrastructure Plan was developed in compliance with Provision C.3.j.i of the Municipal Regional Stormwater NPDES Permit (MRP), Order R2-2015-0049, in collaboration with the San Mateo Countywide Water Pollution Prevention Program (SMCWPPP). The Green Infrastructure Plan describes how the Town will change processes and practices over time to convert infrastructure that directs runoff directly into storm drains and receiving waters with Green Infrastructure, which slows runoff by dispersing it to vegetated areas, harvests and uses runoff, promotes infiltration and evapotranspiration, and utilizes bioretention and other Green Infrastructure practices to treat stormwater runoff. The Green Infrastructure Plan also establishes milestones for areas of impervious surface to be retrofitted with Green Infrastructure and serves as an implementation guide and reporting tool to provide reasonable assurance that urban runoff total maximum daily load (TMDL) waste load allocations are met.

Electricity, Natural Gas, and Telecommunications

Electricity and natural gas would be provided by Peninsula Clean Energy (PCE) and Pacific Gas and Electric (PG&E). PCE is San Mateo County's Community Choice Aggregate (CCA), a community-controlled, not-for-profit Joint Powers Agency. PCE procures renewable sources of electricity throughout San Mateo County, while PG&E manages and maintains the electrical infrastructure used to supply consumers with electricity.

Solid Waste

Hillsborough contracts with Recology San Mateo County for waste and recycling collection and handling. Residential solid waste and recycling is taken to the Shoreway Environmental Center, in San Carlos, for processing and shipment (Town of Hillsborough 2018). This facility also operates as a transfer station and a materials recovery facility. It is owned by the South Bayside Waste Management Authority and operated by South Bay Recycling.

Recology collects recyclables and organics weekly (Town of Hillsborough 2018). Recology also collects used batteries and motor oil (one gallon per week in a one-gallon jug), and bulky items twice a year at no charge. Household hazardous waste (such as paint, solvents, non-prescription drugs, cleaners, etc.) can be picked up at the curbside, on an appointment basis.

4.15.2 Regulatory Setting

Water Supply

Federal

Safe Drinking Water Act

The Safe Drinking Water Act (SDWA), administered by EPA in coordination with the California Department of Public Health (CDPH), is the main federal law that ensures the quality of drinking water. Under SDWA, EPA sets standards for drinking water quality and oversees the states, localities, and water suppliers who implement those standards.

State

California Safe Drinking Water Act

The California Department of Public Health (CDPH) coordinates with the federal EPA to ensure the quality of local drinking water. The CDPH oversees state implementation of the SDWA based on the standards for drinking water quality established by the EPA.

State of California Recycled Water Policy

On January 22, 2013, the SWRCB adopted the State of California Recycled Water Policy, a revision of a 2009 statewide recycled water policy, with the ultimate goal of increasing the use of recycled water from municipal wastewater sources. Included in this policy is the mandate to increase the use of recycled water in California to 1.5 million acre-feet per year (AFY) by 2020, and an additional 2.5 million AFY by 2030. The plan also states that the SWRCB expects to increase the use of stormwater from 2007 levels to at least 500,000 AFY by 2020 and one million AFY by 2030.

Government Code §65589.7

Section (a) of Government Code §65589.7 states that the housing element adopted by the legislative body and any amendments made to that element shall be immediately delivered to all public agencies or private entities that provide water or sewer services for municipal and industrial uses, including residential, within the territory of the legislative body and that priority for the provision of these services shall be provided to proposed developments that include housing units affordable to lower income households.

California Code of Regulations, Title 22, Division 4

The SWRCB – Division of Drinking Water is authorized to set the criteria for recycled water production and use. Title 22, Division 4 of the California Code of Regulations (CCR) defines these criteria, which pertain to treatment processes, water quality, and reliability. It establishes minimum water quality criteria requirements for various use categories, including irrigation, wetlands, and industrial uses. For unrestricted reuse, including use at parks and playgrounds, schoolyards, and other unrestricted access facilities, and specifies disinfected tertiary treatment. Title 22 also specifies that for disinfected tertiary-treated water, there must be a separation of 50 feet between areas irrigated with recycled water and domestic groundwater wells.

Statewide Water Conservation Act of 2009 (Senate Bill X7-7)

In November 2009, the California State legislature passed, and the Governor approved, a comprehensive package of water legislation, including Senate Bill (SB) X7-7 addressing water conservation. In general SB X7-7 requires a 20 percent reduction in per capita urban water use by 2020, with an interim 10 percent target in 2015. The legislation requires urban water users to develop consistent water use targets and to use those targets in their Urban Water Management Plans (UWMPs). SB X7-7 also requires certain agricultural water supplies to implement a variety of water conservation and management practices and to submit Agricultural Water Management Plans.

Urban Water Management Planning Act

Through the Urban Water Management Act of 1983, the California Water Code requires all urban water suppliers within California to prepare and adopt an Urban Water Management Plan (UWMP) and update it every five years. This requirement applies to all suppliers providing water to more than 3,000 customers or supplying more than 3,000 acre-feet of water annually. The Act is intended to support conservation and efficient use of urban water supplies at the local level. The Act requires that total projected water use be compared to water supply sources over the next 20 years in five-year increments, that planning occur for single and multiple dry water years and that plans include a water recycling analysis that incorporates a description of the wastewater collection and treatment system within the agency's service area along with current and potential recycled water uses.

Local/Regional

Hillsborough Urban Water Management Plan

The Hillsborough 2020 Urban Water Management Plan (UWMP) is the long-range planning document used by Hillsborough for water supply and system planning. The UWMP summarizes the Town's historical and projected water demands, water supplies, supply reliability and potential vulnerabilities, water shortage contingency planning, and demand management programs for the years 2020 through 2045. Hillsborough receives the entirety of its water supply from the San Francisco Regional Water System (RWS).

Hillsborough General Plan

The 2005 General Plan provides the fundamental basis for the Town's land use and development policy, and represents the basic community values, ideals, and aspirations to govern a shared environment over the life of the General Plan. The General Plan Land Use Element and Open Space and Conservation Element include the following applicable policies:

Goal OSC-4 - Minimize the impact of urban development on creeks and maintain a high level of water quality.

> *Action OSC-4.3* - The Town will encourage property owners to incorporate water conservation techniques into their landscaping to reduce water usage.

Goal LU-1 - Provide for the preservation and enhancement of the Town's unique residential character.

> *Action LU-1.2* - The Town will enforce its Residential Landscaping requirements to maintain the attractive visual character of Hillsborough, as well as to promote water conservation.

Goal LU-4 - Continue to provide high quality public services and recreational opportunities to maintain the character and quality of life in the Town.

> *Policy LU-4.5* - Work with the San Francisco Public Utilities Commission and the cities of Burlingame and San Mateo to provide quality water and sewer service to Hillsborough.

> *Policy LU-4.6* - Continue to maximize the efficiency of water use throughout the Town.

Action LU-4.4 - The Public Works Department will continue to monitor water and sewer distribution and collection lines to determine those needing repair and provide needed repair, as feasible. Sewer lines affecting natural drainage and creeks should receive first priority for maintenance.

Hillsborough Municipal Code, Title 15 Buildings and Construction, Chapter 15.29 Water Conservation in Landscape Requirements

Chapter 15.29 Water Conservation in Landscape Requirements of the Hillsborough Municipal Code establishes a structure for planning, designing, installing, maintaining and managing water efficient landscape, including, but not limited to, green infrastructure, in applicable new construction and rehabilitated projects and to establish provisions for water management practices and water waste prevention for existing landscapes. Chapter 15.29 includes the Town's outdoor water use efficiency checklist for development projects (Section 15.29.070), requirements for water budget calculations for development projects (Section 15.29.080), requirements for landscape and irrigation design plans (Section 15.29.090), and landscaping stormwater management requirements (Section 15.29.120), and provisions for existing landscapes over one acre in size (Section 15.29.130).

Wastewater

State

State Water Resources Control Board

The SWRCB, in coordination with nine RWQCBs, performs functions related to water quality, including issuance and oversight of wastewater discharge permits (e.g., NPDES), other programs regulating stormwater runoff, and underground and above-ground storage tanks. The RWQCB requires all wastewater collection and disposal providers to prepare a Sewer System Management Plan according to the Statewide General Order Waste Discharge Requirements for Sanitary Sewer Systems.

Local

Hillsborough General Plan

The 2005 General Plan provides the fundamental basis for the Town's land use and development policy, and represents the basic community values, ideals, and aspirations to govern a shared environment over the life of the General Plan. The General Plan Land Use Element includes the following applicable policies:

Goal LU-4 Continue to provide high quality public services and recreational opportunities to maintain the character and quality of life in the Town.

Policy LU-4.5: Work with the San Francisco Public Utilities Commission and the cities of Burlingame and San Mateo to provide quality water and sewer service to Hillsborough.

Action LU-4.4: The Public Works Department will continue to monitor water and sewer distribution and collection lines to determine those needing repair and provide needed repair, as

feasible. Sewer lines affecting natural drainage and creeks should receive first priority for maintenance.

Hillsborough Wastewater Collection System Master Plan

The Hillsborough Wastewater Collection System Master Plan last updated June 2023. The SSMP ensures continuous improvement of the Town's sanitary sewer system infrastructure and operations, including those related to performance, maintenance, inspection, condition assessment, monitoring, spill response, reporting and identification of repair and replacement needs.

Stormwater

Federal

Clean Water Act

The Clean Water Act (CWA) is the primary federal legislation governing water quality and forms the basis for several state and local laws throughout the nation. The objective of the CWA is "to restore and maintain the chemical, physical, and biological integrity of the Nation's waters." Important and applicable sections of the Act are:

- Section 404 authorizes the United States (U.S.) Army Corps of Engineers (USACE) to regulate the discharge of dredged or fill material to waters of the U.S., including wetlands. The USACE issues individual site-specific or general (Nationwide) permits for such discharges.
- Sections 303 and 304 provide for water quality standards, criteria, and guidelines. The State implements Section 303 through the State Water Resources Control Board and Regional Water Quality Control Board (RWQCB), as discussed below. Section 304 requires the U.S. Environmental Protection Agency to publish water quality criteria that accurately reflects the latest scientific knowledge on the kind of effects and extent of effects that pollutants in water may have on health and welfare. Section 304 also provides guidance to the State in adopting water quality standards.
- Section 401 requires an applicant for any Federal permit that proposes an activity that may result in a discharge to "waters of the U.S." to obtain certification from the State that the discharge will comply with other provisions of the CWA. In California, a Water Quality Certification is provided by the State Water Resources Control Board and/or RWQCB.
- Section 402 establishes the National Pollutant Discharge Elimination System (NPDES), which is a permitting system for the discharge of any pollutant (except for dredge or fill material) into waters of the U.S. In California, this permit program is administered by the RWQCBs, and is discussed in detail below.

National Pollutant Discharge Elimination System

The CWA has nationally regulated the discharge of pollutants to waters of the U.S. (e.g., streams, lakes, bays, etc.) from any point source since 1972. In 1987, amendments to the CWA added Section 402(p), which established a framework for regulating nonpoint source stormwater discharges under the National Pollutant Discharge Elimination System (NPDES) permit program. These regulations are implemented at the regional level by the Regional Water Quality

Control Boards (RWQCBs). The Town of Hillsborough is within the jurisdiction of the San Francisco Bay RWQCB.

State

State Water Resources Control Board

Created by the California State Legislature in 1967, the State Water Resources Control Board (SWRCB) holds authority over water resources allocation and water quality protection within the State. The five-member SWRCB allocates water rights, adjudicates water right disputes, develops statewide water protection plans, establishes water quality standards, and guides the nine RWQCBs. The mission of the SWRCB is to, "preserve, enhance, and restore the quality of California's water resources, and ensure their proper allocation and efficient use for the benefit of present and future generations." The proposed Project is under the jurisdiction of the San Francisco Bay RWQCB.

Porter-Cologne Water Quality Control Act

The state's Porter-Cologne Water Quality Control Act, as revised in December 2007 (California Water Code Sections 13000-14290), provides for protection of the quality of all waters of the State of California for use and enjoyment by the people of California. It further provides that all activities that may affect the quality of waters of the state shall be regulated to obtain the highest water quality that is reasonable, considering all demands being made and to be made on those waters. The Act also establishes provisions for a statewide program for the control of water quality, recognizing that waters of the state are increasingly influenced by interbasin water development projects and other statewide considerations, and that factors such as precipitation, topography, population, recreation, agriculture, industry, and economic development vary regionally within the State. The statewide program for water quality control is, therefore, administered most effectively on a local level with statewide oversight. Within this framework, the Act authorizes the SWRCB and RWQCBs to oversee the coordination and control of water quality within California.

Statewide Construction General Permit

The SWRCB has implemented an NPDES General Construction Permit for the State of California (Construction General Permit). Development sites that disturb one or more acres of land or that are less than one acre but are part of a larger common plan of development require permit coverage and must comply with the Construction General Permit,[47] which requires that project proponents prepare site drawings and maps, a Stormwater Pollution Prevention Plan (SWPPP) for short-term construction-related water quality impacts, applicable post-construction plans, and file of a Notice of Intent with the SWRCB. The Construction General Permit includes requirements for training, inspections, record keeping, and, for projects of certain risk levels, monitoring. The general purpose of the requirements is to minimize the discharge of pollutants and to protect beneficial uses and receiving waters from the adverse effects of construction-related stormwater discharges.

[47] Projects are not considered part of a larger common plan of development if separated by ¼ mile or more.

Local

San Francisco Bay Basin Plan

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

Municipal Regional Permit Provision C.3.

The San Francisco Bay RWQCB most recently re-issued the Municipal Regional Stormwater NPDES Permit (MRP) in May 2022 to regulate stormwater discharges from municipalities and local agencies (co- permittees) in Alameda, Contra Costa, San Mateo, and Santa Clara Counties, and the cities of Fairfield, Suisun City, and Vallejo. Under Provision C.3 of the MRP, regulated projects include new development projects that create 5,000 square feet or more of impervious surface (collectively over the entire project site) including commercial, industrial, residential housing subdivisions (i.e., detached single-family home subdivisions, multi-family attached subdivisions (town homes), condominiums, and apartments), mixed-use, and public projects (other than public road projects), including sidewalks and any other portions of the public right of way that are developed or redeveloped as part of the projects. This category includes development projects on public or private land that fall under the planning and building authority of a Permittee. Regulated Projects are required to implement LID source control, site design, and stormwater treatment onsite or at a joint stormwater treatment facility, meaning a stormwater treatment facility built to treat the combined runoff from two or more Regulated Projects.

LID-based treatment controls are intended to maintain or restore the site's natural hydrologic functions, maximizing opportunities for infiltration and evapotranspiration, and using stormwater as a resource (e.g., rainwater harvesting for non-potable uses). The MRP also requires that stormwater treatment measures be properly installed, operated, and maintained.

In addition to water quality controls, the MRP requires new development and redevelopment projects that create or replace one acre or more of impervious surface to manage development-related increases in peak runoff flow, volume, and duration, where such hydromodification is likely to cause increased erosion, silt pollutant generation, or other impacts to local rivers, streams, and creeks.

Projects may be deemed exempt from these requirements if they do not meet the minimum size threshold, drain into tidally influenced areas or directly into the Bay, or drain into hardened channels, or if they are infill projects in subwatersheds or catchment areas that are greater than or equal to 65 percent impervious.

San Mateo Countywide Water Pollution Prevention Program

The San Mateo Countywide Water Pollution Prevention Program (SMCWPPP) is the local agency responsible for the oversight of implementation of the applicable provisions, including Provision C.3, of the MRP by local jurisdictions within San Mateo County.

Hillsborough General Plan

The 2005 General Plan provides the fundamental basis for the Town's land use and development policy, and represents the basic community values, ideals, and aspirations to govern a shared environment over the life of the General Plan. The General Plan Open Space and Conservation Element includes the following applicable policies:

Goal OSC-4 - Minimize the impact of urban development on creeks and maintain a high level of water quality.

> *Policy OSC-4.4* - Require projects to reduce, to the extent feasible, potential sediment discharge, erosion, run-off flow and volume, and stormwater pollution, both during construction, as well as post-construction. Require projects to incorporate mitigation measures, such as Best Management Practices (BMPs), to address these water quality impacts, especially if proposing construction during the wet season.
>
> *Policy OSC-4.5* - Reduce the amount of hazardous wastes entering into the local and regional waterways by:
>
> - Prohibiting the illicit dumping of wastes into storm drains, creeks and other waterways.
> - Prohibiting the discharge of pollutants to the maximum extent practicable.
> - Encouraging the use of naturally pest-resistant landscaping and design features that reduce the need for chemical treatments, and incorporate stormwater detention and retention into their design, when appropriate.
>
> *Action OSC-4.2* - As co-permittee, the Town will continue to participate in the San Mateo Stormwater Pollution Prevention Program (STOPPP) or equal program. New development and Town activities will be reviewed for compliance with STOPPP as part of project approval. The Town will also monitor construction to ensure compliance with any required mitigation.

Hillsborough Municipal Code, Title 13 Public Services, Chapter 13.50 and 13.54

Chapter 13.50 of the Hillsborough Municipal Code implements the provisions of the federal Clean Water Act regarding discharge regulations and requirements for the Town. The purpose of Chapter 13.50 is to ensure the future health, safety, and general welfare of the town of Hillsborough's citizens by:

A. Eliminating discharges: eliminating non-stormwater discharges to the municipal separate storm sewer;

B. Controlling discharges: controlling the discharge to municipal separate storm sewers from spills, dumping or disposal of materials other than stormwater; and

C. Reducing pollutants: reducing pollutants in stormwater discharges to the maximum extent practicable.

Chapter 13.50.090 prohibits discharges of non-stormwater discharges to the city storm sewer system, providing exceptions for NPDES Permit Holders and some activities. Chapter 13.50.120 establishes requirements for persons engaged in activities which will or may result in pollutants entering the city storm sewer system to undertake all practicable measures to reduce such pollutants. Examples of these activities include ownership and use of facilities which may be a source of pollutants such as parking lots, gasoline stations, industrial facilities, commercial facilities, and stores fronting city streets. Chapter 13.50.130 requires every person owning property through which a watercourse passes, or such person's lessee or tenant, to keep and maintain that part of the watercourse within the property reasonably free of trash, debris, excessive vegetation, and other obstacles which would pollute, contaminate, or significantly retard the flow of water through the watercourse. It also requires property owners to maintain existing privately owned structures within a watercourse so that such structures will not become a hazard to the use, function, or physical integrity of the watercourse and prohibits property owners from removing healthy bank vegetation beyond that actually necessary for such maintenance, nor removing such vegetation in such a manner as to increase the vulnerability of the watercourse erosion. Chapter 13.50.140 establishes the Town's power of inspection and enforcement of these regulations.

Chapter 13.54 of the Municipal Code implements the National Pollutant Discharge Elimination System (NPDES) Stormwater Pollution Prevention Program in Hillsborough as mandated by federal law. The Town has determined that an annual storm drainage charge applicable to each parcel in the town is necessary to meet the town's costs associated with this program. This chapter establishes provisions for the collection of storm drain charges.

Electricity and Natural Gas

State

Senate Bill 100

Officially titled, "The 100 Percent Clean Energy Act of 2018," Senate Bill 100:

- Sets a 2045 goal of powering all retail electricity sold in California and state agency electricity needs with renewable and zero-carbon resources — those such as solar and wind energy that do not emit climate-altering greenhouse gases.
- Updates the state's Renewables Portfolio Standard to ensure that by 2030 at least 60 percent of California's electricity is renewable.
- Requires the Energy Commission, Public Utilities Commission and Air Resources Board to use programs under existing laws to achieve 100 percent clean electricity and issue a joint policy report on SB 100 by 2021 and every four years thereafter.

Local

Hillsborough General Plan

The 2005 General Plan provides the fundamental basis for the Town's land use and development policy, and represents the basic community values, ideals, and aspirations to govern a shared environment over the life of the General Plan. The General Plan Land Use Element and Public Safety Element include the following applicable policies:

> *Policy LU-4.8* - Work closely with providers of energy, communications and solid waste disposal in determining and meeting the needs of the community for energy, communications and solid waste disposal.
>
> *Policy LU-4.9* - Continue to promote energy conservation and recycling by the public and private sectors to reduce overall energy use and maintain at least a 50 percent diversion of solid waste from the landfill.
>
> *Action PS-5.3* - The Town will continue to promote energy conservation by the public and private sectors. New development and remodeling will be encouraged to incorporate features that minimize energy use, such as planting trees along the south and west-facing sides of buildings; using solar heating; installing energy efficient lighting and heating/cooling systems, as well as increased insulation; and replacing older appliances with energy efficient models. The Town will also incorporate energy saving design features and devices in Town property, when appropriate.

Hillsborough Municipal Code Chapter 15.10 Energy Code, Section 15.10.050 Energy Reach Code

Hillsborough has adopted a reach code creating local energy standards to electrify new construction and achieve greenhouse gas reduction goals. The local amendments to the California Energy Code and Green Building Code require newly constructed low-rise residential buildings to be electrically heated mixed-fuel buildings. New low-rise residential buildings must have electric space heating and electric water heating.

Solid Waste

State

Integrated Waste Management Act of 1989

The California Integrated Waste Management Act of 1989, also known as AB 939, requires that each city or county prepare a new integrated waste management plan. The act also required each city to prepare a Source Reduction and Recycling Element by July 1, 1991. Each Source Reduction and Recycling Element includes a plan for achieving a solid waste goal of 25 percent by January 1, 1995, and 50 percent by January 1, 2000. In 2011, AB 341 was passed, which directs the California Department of Resources Recycling and Recovery to require local agencies to include strategies to enable the diversion of 75 percent of all solid waste by 2020.

California Department of Resources, Recycling, and Recovery (CalRecycle)

CalRecycle oversees, manages, and monitors waste generated in California. It provides limited grants and loans to help California cities, counties, businesses, and organizations meet the State waste reduction, reuse, and recycling goals. It also provides funds to clean up solid waste disposal sites and co-disposal sites, including facilities that accept hazardous waste substances and non-hazardous waste. CalRecycle develops, manages, and enforces waste disposal and recycling regulations, including AB 939 and SB 1016 (see below).

Assembly Bill 939

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

Senate Bill (SB) 1016

This requires that the 50 percent solid waste diversion requirement established by AB 939 be expressed in pounds per person per day. SB 1016 changed the CalRecycle review process for each municipality's IWMP. The CalRecycle Board reviews a jurisdiction's diversion rate compliance in accordance with a specified schedule. Beginning January 1, 2018, the Board will be required to review a jurisdiction's source reduction and recycling element and hazardous waste element every two years.

Assembly Bill 1826

AB 1826 (2014) sets forth the requirements of the statewide mandatory commercial organics recycling program for businesses and multi-family dwellings with five or more units that generate two or more cubic yards of commercial solid waste per week. AB 1826 sets a statewide goal for 50 percent reduction in organic waste disposal by the year 2020.

Senate Bill 1383

SB 1383 (2016) establishes targets to achieve a 50 percent reduction in the level of the statewide disposal of organic waste from the 2014 level by 2020 and a 75 percent reduction by 2025. The bill grants CalRecycle the regulatory authority required to achieve the organic waste disposal reduction targets and establishes an additional target that at least 20 percent of currently disposed edible food is recovered for human consumption by 2025. On January 1, 2022, CalRecycle's regulations to meet the organic waste reduction targets for 2025 took effect and became enforceable.

California Green Building Standards Code Compliance for Construction, Waste Reduction, Disposal and Recycling.

In January 2010, the State of California adopted the California Green Building Standards Code ("CALGreen"), establishing mandatory green building standards for all buildings in California.

The code covers five categories: planning and design, energy efficiency, water efficiency and conservation, material conservation and resources efficiency, and indoor environmental quality. These standards include the following mandatory set of measures, as well as more rigorous voluntary guidelines, for new construction projects to achieve specific green building performance levels:

- Reducing indoor water use by 20 percent;
- Reducing wastewater by 20 percent;
- Recycling and/or salvaging 65 percent of nonhazardous construction and demolition ("C&D") debris, or meeting the local construction and demolition waste management ordinance, whichever is more stringent (see Hillsborough-specific CALGreen building code requirements below); and
- Providing readily accessible areas for recycling by occupants.

Local

Hillsborough General Plan

The 2005 General Plan provides the fundamental basis for the Town's land use and development policy, and represents the basic community values, ideals, and aspirations to govern a shared environment over the life of the General Plan. The General Plan Land Use Element includes the following applicable policies:

Policy LU-2.4 - Ensure that construction projects are completed in a timely manner with minimal impact on surrounding residences, including minimizing the visual impacts related to the on-site location of sanitary facilities, construction materials and debris, and recycling materials.

Goal LU-4 - Continue to provide high quality public services and recreational opportunities to maintain the character and quality of life in the Town.

Policy LU-4.8 - Work closely with providers of energy, communications and solid waste disposal in determining and meeting the needs of the community for energy, communications and solid waste disposal.

Policy LU-4.9 - Continue to promote energy conservation and recycling by the public and private sectors to reduce overall energy use and maintain at least a 50 percent diversion of solid waste from the landfill.

Action LU-4.5 - The Town will continue to implement the Recycling of Construction and Demolition Ordinance to minimize the amount of construction debris disposed of in the landfill.

Action LU-4.6 - The Town will continue to contract for the collection of household recycling from each home on a regular basis. When renewing or amending the contract, consideration will be given to the need to meet the State's 50 percent diversion requirements for solid waste, the ease of pick-up, hours of collection, visual design of recycling containers, location where containers are collected for pick-up and overall cost for recycling collection.

Hillsborough Recycling of Construction and Demolition Debris Ordinance

Chapter 15.18 of the Hillsborough Municipal Code promotes the recycling of construction and demolition debris in order to protect the public health, safety, and welfare, and to meet the town's obligations under AB 939 and the current version of the California Green Buildings Standards Code. Chapter 15.18 requires applicants to divert from landfills a minimum of sixty-five percent, by weight, construction and demolition debris generated from the project or other amount established by state law, whichever is higher, by using recycling, reuse, and diversion programs. It also requires compliance with the California Green Building Standards Code. Chapter 15.18.030 requires project applicants to submit a properly completed waste reduction plan and provides requirements for waste reduction plans. Waste reduction plans must contain, at a minimum, the following:

1. The type of project;
2. The total square footage of the project;
3. The estimated weight of project construction and demolition debris to be generated by material type;
4. The construction and demolition debris materials that will be diverted from disposal by recycling, reuse on the project or salvage for future use or sale;
5. If construction and demolition debris will be sorted on-site (source-separated) or bulk mixed (single stream);
6. Diversion facilities where the construction and demolition debris will be taken;
7. Construction methods taken to reduce the amount of construction and demolition debris generated; and,
8. The amount of construction and demolition debris diverted by weight.

Hillsborough Municipal Code Chapter 8.12 - Garbage, Recyclables, and Organic Waste

Chapter 8.12 of the Hillsborough Municipal Code establishes garbage, recycling, and organic waste disposal requirements for single-family generators and commercial businesses. This chapter also addresses multi-family residential building waste disposal requirements in Chapter 8.12.120 (Requirements for Commercial Businesses).

4.15.3 Thresholds of Significance

Potential impacts related to utilities and service systems were determined in accordance with Appendix G of the CEQA Guidelines. Impacts would be considered potentially significant if the proposed Project will:

A. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.

B. Have insufficient 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 wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the 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. Not comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

4.15.4 Impacts and Mitigation Measures

The proposed Project consists of updates to the existing 2014 - 2022 Housing Element to reflect the 6th cycle 2023 – 2031 housing assignments. In addition, associated amendments to the Land Use Element and General Plan Land Use Map, Open Space and Conservation Element, and Public Safety Element; amendments to Title 17 (Zoning) of the Hillsborough Municipal Code, and amendments to the Hillsborough Zoning Map are proposed for consistency of all Town documents, codes, and regulations. These associated amendments are generally described in sections 3.3.9 through 3.3.12 in the Project Description and would not result in environmental impacts related to utilities and service systems. Therefore, they are not discussed further in this chapter. The impact analysis focuses on the residential development that would be facilitated by the Draft 2023 – 2031 Housing Element.

Impact UTS-1 – Require Construction of New or Expanded Utility Infrastructure Which Could Cause Significant Environmental Effects. *[Threshold of Significance (a)]*

Residential development associated with implementation of the Project would result in increased demand for utility services and the extension of utility infrastructure into currently undeveloped sites. The new development of the 23 single-family lots (Housing Element Approach 2), the three subdivision/lot split sites (Housing Element Approach 4) and the two multi-family sites (Housing Element Approach 5) would require extension of utility infrastructure into each of these sites (water, wastewater, and storm drain). The proposed Project does not include any specific proposals for new utility facilities, and all future infrastructure projects subject to CEQA would be required to undergo project specific environmental review to evaluate impacts at the time of their proposal.

Water

As described above, water service is provided to the planning area by the Town of Hillsborough, which obtains 100 percent of its water from the San Francisco Public Utilities Commission (SFPUC) under contract.

The Town's water distribution system consists of a series of water mains and pipeline turnouts connecting to SFPUC pipelines, pump stations, and storage facilities (storage tanks and reservoirs), which the Town's Water Division maintains to ensure that the water delivered to the Town residents is safe and healthy for human consumption. There are approximately 4,304

water service connections and 1,013 fire hydrants. Most of the water used in Hillsborough (91 percent) is for single-family homes; the remainder is delivered to two golf courses and six schools, and for Town operational use.

The Town has a Water Master Plan in place to prioritize long-term maintenance issues and is updating its thirty-year Capital Improvement Project Plan. Distribution system improvement projects conducted by the Town since 2015 include work on water pump stations and water tanks, water main replacement projects, and fire flow upgrades. In addition, the Town has a five-year capital improvement plan, which includes infrastructure improvements and land developments defined in the Draft 2023 – 2031 Housing Element (e.g., Tobin Clark multi-family housing, Town Hall Complex plus housing), and other community enhancement projects. In particular, the water main replacement program addresses water supply network needs, incorporating the replacement and upsizing of pipes as necessary to ensure adequate water pressure to meet fire flow requirements and to use earthquake-resistant, flexible pipes that are not subject to corrosion.

Municipal Code Chapter 13.20 establishes water charges to pay for water supply, storage, and system infrastructure as necessary to supply water to all properties located in the Town or located elsewhere but connected to the Town's water system.

Municipal Code Section 16.28.010 regarding improvements for subdivision requires new subdivisions to include domestic water supply necessary for public health and fire protection, and other public utilities (e.g., water storage tanks, reservoirs, pumping stations), necessary for the public safety.

According to the Town Public Works Department, the Town has water infrastructure available around the areas proposed for development with adequate capacity to serve all the new housing, which would include all ADU locations, all Vacant Opportunity Sites, all the Subdivision/Lot Split Sites, and three of the Multi-Family Sites (the Town Hall site, Nueva School, and Burlingame Country Club; the exception is the Tobin Clark site, discussed later in this section).

Impacts of ADUs: The Town (Public Works) would review new ADU applications for utilities connections and capacity. Fire suppression flows are reviewed by the Building Divion and Fire Department for projects that trigger Building Code thresholds. Required improvements would be conditioned as part of the tentative map or building permit.

Impacts of Vacant Opportunity Sites: The Town (Public Works) would review new project applications for utilities connections and capacity. Changes in water infrastructure needs due to the proposed housing would be reviewed by the Town (Public Works) at the time of the application. Required improvements would be conditioned as part of the tentative map or building permit. Any new single-family home water connection would be reviewed during the permit application process.

Impacts of Subdivision/Lot Split Opportunity Sites (*2260 Redington Road, 50 Brooke Court, Hayne Road):* Similar to vacant opportunity sites, the Town (Public Works) would review new project applications for utilities connections and capacity. Changes in water infrastructure needs would be reviewed by the Town (Public Works) at the time of the application. Fire suppression

flow would be reviewed by the Building Division and Fire Department for projects that trigger Building Code thresholds. Required improvements would be conditioned as part of the tentative map or building permit. A subdivision or new single-family home water connection would be reviewed during the permit application process. In most cases new water lines would be extended from the water main in the street into the subject property.

Impacts of Multi-Family Opportunity Sites (*Nueva School, Burlingame Country Club, Town Hall Complex, Tobin Clark):* The Nueva School and Burlingame Country Club sites are already allowed to develop a small number of multi-family housing units on site and are already developed with utility infrastructure. Changes to infrastructure needs for these two sites are not anticipated but the Town would review the applications for any needed changes in water infrastructure when an application is submitted.

The Town Hall and Tobin Clark sites would require rezoning to allow multi-family uses and will likely require upgrades/improvements in the water supply infrastructure. Any changes in water infrastructure needs due to rezoning and the resulting residential development would be reviewed by the Town (Public Works) at the time of the application, along with utilities connections and capacity. Fire suppression flows would be reviewed by the Building Divion and Fire Department. Required improvements would be conditioned as part of the tentative map or building permit. A subdivision water connection would be reviewed during the permit application process. With respect to impacts associated with new water infrastructure needed for the Tobin Clark site, see Impact UTS-2.

As future individual projects are proposed within the Planning Area, specific water-related infrastructure needs of any particular development would be reviewed for related service needs such as hook-ups to water mains or any pipeline upgrades identified by Public Works. Impacts from new water connections would be expected to be limited to construction-period impacts, which could include pavement cutting, trenching, digging, vegetation removal and drainage crossings, and pipeline placement or replacement, and which would typically occur within either existing public rights-of-way, Town property, a project development site, or private property subject to a municipal easement. In general, these construction period impacts would include air emissions (dust), loss of vegetation, noise, and traffic interruption and would be reduced through mandatory Town of Hillsborough construction mitigation procedures (see Chapters 4.2 [Air Quality], 4.3 [Biological Resources], and 4.4 [Cultural Resources and Tribal Cultural Resources], of this EIR). No additional significant environmental impact would be anticipated with such construction activity beyond those already identified in this EIR. Implementation of the Town's development review process would ensure the Project's potential incremental impacts associated with water-related service and infrastructure would be reduced or avoided. Therefore, this potential impact would be considered ***less than significant***.

Impact UTS-2 – Impacts Due to New Water Infrastructure for the Tobin Clark Site. *[Threshold of Significance (a)]*

The nearest water supplier connection to the Tobin Clark Site would likely be with CalWater with water supply connections being provided through the College of San Mateo and the City of San Mateo. However, there is no certainty that this could be arranged, even if desired by a project developer; connecting to a water supplier outside of the Town would be a planning decision to consider when a development proposal for the site is submitted. More detailed information

would be needed to confirm the appropriate selection of water supplier, and further studies on specific pipe segments, adequate pressure to the units, and availability of emergency flows would also be necessary.

Therefore, this Program EIR analyzes the potential environmental impacts of extending a water supply pipeline from within the Town to the Tobin Clark site. This extension would likely be from the Brooke Court area and travel through a steep, vegetated area of the Tobin Clark parcel(s) to reach the proposed area of development. The Hillsborough Public Works Department has prepared preliminary estimates that indicate a pipeline length in excess of 1,400 feet may be needed. Environmental impacts resulting from the construction of this pipeline would include impacts to biological resources and potential impacts to aesthetics from loss of vegetation, unknown cultural and tribal resources and hydrology and water quality impacts from erosion and siltation.

The 1,400 feet of new pipeline potentially needed to provide a water supply connection to the Tobin Clark site would potentially require extensive vegetation removal including riparian vegetation, the crossing of one or more creeks, and potential disturbance of sensitive habitat, all of which would significantly adversely affect biological resources. Impacts on biological resources from this water pipeline would be uncertain without determination of the actual pipeline route, but considering the existing biological conditions and topography of the site and environs, and also considering the extent of work required (e.g., length of the pipeline), impacts would likely occur related to special-status species, nesting birds, roosting bats, riparian habitat and other sensitive natural communities, state and/or federally protected wetlands, wildlife movement corridors and wildlife nursery sites, protected trees, and oak woodland. This would be considered a ***significant impact***.

The site has potential for the occurrence of six special-status plant species and the potential for occurrence of two special-status wildlife species (see Chapter 4.3 Biology). Consultation with the U.S. Fish and Wildlife Service, the California Department of Fish and Wildlife would be required to determine potential impacts on species and necessary mitigation; direct impacts to sensitive aquatic or terrestrial land cover types may require permits from the regulatory agencies with jurisdiction over that land cover type. Disturbance and loss of riparian woodland and scrub habitat along drainage channels, which are considered a sensitive natural community, could also be a significant impact if pipeline planning and construction is not properly handled. Crossing a stream or creek would require jurisdictional agency review because creeks are protected by the federal Clean Water Act and the California Porter-Cologne Act (creeks and riparian habitat are also protected by the California Fish and Game Code), which would also require consultation with the Regional Water Quality Control Board. In addition, the Town's stream setback and tree removal regulations could also require pipeline route adjustments that may result in additional removal of vegetation and trees. Other impacts associated with a pipeline of this length (over a quarter-mile) may include placement or removal of fill, vegetation removal (noted above), equipment access, indirect aquatic impacts, and erosion/runoff impacts.

Although specific details regarding project development on the Tobin Clark site are not known at this time, it is plausible that construction activities would adversely affect biological resources, and therefore the proposed Project would have a potentially significant impact requiring mitigation (See Mitigation Measures BIO-1 through BIO-4).

As discussed in Chapter 1, Introduction, "Future site-specific development facilitated by the Project, but which has not yet been described at a project-specific level of detail, will be evaluated for consistency with this EIR if and when the development is proposed." This review would determine whether the project is subject to additional CEQA compliance at such time as the Town receives a permit application for the project and the details of the individual project are defined. It is anticipated that the Tobin Clark site will require its own CEQA analysis based on the proposed development application. At that time, the environmental analysis would address impacts specific to the project including the impacts to biological resources protected by federal or State laws and resource agency permit requirements, consistency with General Plan policies; consistency with building and engineering regulations of the Town; consistency with the Mitigation Measures adopted as part of this EIR; site-specific biological, cultural resource, and visual effects, impacts on on-site and off-site drainage.

Impact UTS-1: Construction of utility service pipelines (water, wastewater, storm drain) to serve the Tobin Clark site could impact sensitive biological resources.

Mitigation Measure UTS-1: New Water, Wastewater, and Storm Drain Infrastructure for the Tobin Clark Site. The Town shall work with the City of San Mateo, the College of San Mateo, and the future developer of the Tobin Clark site to obtain water supply through the City of San Mateo and the College of San Mateo, thus avoiding the construction of a potentially 1,400 foot-long pipeline through sensitive habitats.

If water supply through the City of San Mateo and the College of San Mateo is not possible and the approximately 1,400-foot pipeline from the Town to the Tobin Clark site must be constructed, mitigation measures BIO-1, BIO-2, BIO-3, and BIO-4 shall be implemented and the development application for the Tobin Clark site shall be evaluated for consistency with the certified Final EIR for the Project (e.g., compliance with the Final EIR mitigation measures for the Project).

Implementation of UTS-1 would reduce utility infrastructure construction impacts from the Tobin Clark site to ***less than significant***.

Wastewater

The Town's sanitary sewer system consists of a collection of gravity pipes, force mains, and four lift stations organized into two primary sewer drainage basins along Hayne Road: the Burlingame Sewer Basin ("north basin") and the San Mateo Sewer Basin ("south basin"). Wastewater from the Burlingame Basin flows north into the Burlingame wastewater treatment plant (WWTP).[48] Wastewater from the San Mateo Basin flows south into the San Mateo WWTP.[49]

The Burlingame WWTP, operational since 1935, has a design capacity to treat 5.5 million gallons per day (mgd) of wastewater per day and 16 mgd during wet weather. The San Mateo

[48] Wastewater from a small part of the Burlingame basin flows to the District of Burlingame Hills, but ultimately this wastewater is conveyed through the City of Burlingame to the Burlingame WWTP.

[49] The San Mateo basin also receives wastewater from the Crystal Springs County Sanitation District (CSCSD), the County of San Mateo, and small tributary areas from the City of San Mateo, ultimately being conveyed through the City of San Mateo to the San Mateo WWTP.

WWTP, last upgraded in 1970, has an existing design capacity of 40 mgd; as part of the City's Clean Water Program, San Mateo is planning to increase plant capacity to 78 mgd. Approximately 40 percent of the Town's average daily wastewater flows to the Burlingame WWTP, with the remainder flowing to the San Mateo WWTP. Wastewater from the Town represents approximately 10 percent of the Burlingame treatment capacity and less than six percent of the San Mateo treatment capacity.

According to the Wastewater Collection System Master Plan Update (WCSMP), prepared for the Town by Akel Engineering Group, Inc., sewer system modeling was used to evaluate future wastewater flows (to year 2040) from the projected development of 554 housing units proposed by the Project, compared to existing wastewater flows, and used a factor of 207 gpd per dwelling unit. As discussed in the WCSMP (p. 7-2), under current (existing) dry weather (peak dry weather) conditions, the hydraulic model indicated that "pipes in the collection system are generally less than 75 percent full," and therefore, under existing conditions, the collection system is adequately sized to meet the Town's daily dry weather wastewater flows. However, under current wet weather conditions (peak wet weather), the hydraulic model indicated system deficiencies and potential overflows, including overflows immediately upstream of the Hayne Lift Station

Under future conditions (which includes buildout of the Town's RHNA requirement reflected in the Draft 2023 – 2031 Housing Element), the hydraulic model[50] shows that the collection system would still be adequately sized to accommodate future dry weather flows, and "[s]imilar to existing PDWF [peak dry weather flow] conditions, most of the collection system pipes" would be less than 75 percent full. However, during future peak wet weather flows, the hydraulic model indicated that the current deficiencies (e.g., does not meet Town performance and design criteria) would decrease and potential sewer overflows would not occur because of a reduction in Rainfall Dependent Infiltration and Inflow (RDII) as a result of anticipated implementation of the Town's ongoing and near-term rehabilitation projects to replace deficient sewer line infrastructure. As noted in the WCSMP (p. 7-2), "[o]nce the upstream pipelines are upsized" as part of the planned sewer infrastructure improvements, the lift station would be adequately sized to accommodate future wet weather flows. According to the Wastewater Collection System Master Plan Update (p. 7-8), the replacement of 1,396 feet of existing 8-inch and 10-inch diameter gravity pipes on Hayne Road, from East of Sandra Road to the Hayne Lift Station, with new 12-inch gravity pipe is identified as a near-term (2027-2030) wastewater infrastructure improvement project. Also as indicated in the WCSMP (p. 7-2), since 2016, the Hayne Street Lift station has been identified for replacement of its existing pumps with new pumps, though the current pumping capacity would remain unchanged.

To conclude, as reported in the WCSMP (pp. 5-3 and 5-4, 7-2), under future conditions (which includes buildout of the Town's RHNA requirement reflected in the Draft 2023 – 2031 Housing Element), lift station capacity would be adequately sized to accommodate future wet weather flows (when the upstream pipelines upsizing is completed) and sewer overflows would no longer be anticipated on any of the Town's major sewer trunk systems.

[50] Town of Hillsborough, Wastewater Collection System Master Plan Update, prepared by Akel Engineering Group, Inc. June 2023, p. 7-2.

Muni Code Section 16.28.010 regarding improvements for subdivision requires new subdivisions to include extension of sanitary sewer service to each lot and other public utilities (e.g., pumping) necessary for public safety.

The Town's Capital Improvement Plan identifies several wastewater infrastructure projects, including sewer lift station renovation projects that will replace existing pumps with more efficient pumps, and upgrading of the stations to meet current electrical code and improve safety and maintenance efficiency. Sewer Priority Basins have been identified for replacement and repair of main sewer drainage lines and manholes necessary to provide system reliability and reduce sanitary sewer overflows. The Capital Improvement Plan anticipates development of the Housing Opportunity Sites for the wastewater infrastructure improvements identified and prioritized in the WCSMP that will benefit development of the identified Housing Opportunity Sites facilitated by the Project.[51]

According to the Town Public Works Department, the Town has sewer infrastructure available around the areas proposed for development with adequate capacity to serve all the new housing, which would include all ADU locations, all Vacant Opportunity Sites, all the Subdivision/Lot Split Sites, and three of the Multi-Family Sites (the Town Hall site, Nueva School, and Burlingame Country Club; the exception is the Tobin Clark site, discussed later in this section). However, according to Public Works, more detailed information is needed, and further studies would need to be done on specific pipe segments (along with review of population increase, flow contribution, and downstream flow monitoring).

Impacts of ADUs: The Town (Public Works) would review new project applications for sanitary sewer utility connections and capacity, which could include studies of specific pipe segments as determined by Public Works. Required improvements would be conditioned as part of the tentative map or building permit.

Impacts of Vacant Opportunity Sites: The Town (Public Works) would review new project applications for sanitary sewer utility connections and capacity, which could include studies of specific pipe segments as determined by Public Works. Changes in sewer infrastructure needs due to the proposed development would be reviewed by the Town (Public Works) at the time of the application. It is likely a sewer lateral line would be extended from the sewer main in the street to sever the vacant opportunity sites. Required improvements would be conditioned as part of the tentative map or building permit.

Impacts of Subdivision/Lot Split Opportunity Sites (*2260 Redington Road, 50 Brooke Court, Hayne Road):* Similar to vacant opportunity sites, the Town (Public Works) would review new project applications for sanitary sewer utility connections and capacity, which could include studies of specific pipe segments as determined by Public Works. Changes in sewer infrastructure needs due to the proposed development would be reviewed by the Town (Public Works) at the time of the application. It is likely a sewer lateral line would be extended from the sewer main in the street to sever the vacant opportunity sites. Required improvements would be conditioned as part of the tentative map or building permit.

[51] Town of Hillsborough. 2023. Adopted Budget Fiscal Year 2023-2024 (section 5 "Capital Improvement Plan"), pp. 12, 222, 226, and 238-243.

Impacts of Multi-Family Opportunity Sites (*Nueva School, Burlingame Country Club, Town Hall Complex, Tobin Clark):* The Nueva School and Burlingame Country Club sites are already allowed (designated and zoned) to develop a small number of multi-family housing units on site and are already developed with utility infrastructure. Changes to infrastructure needs for these two sites are not anticipated but the Town would review the applications for any needed changes in wastewater infrastructure when an application is submitted.

The Town Hall and Tobin Clark sites would require rezoning to allow multi-family uses and would likely require upgrades/improvements in the existing wastewater infrastructure. Any changes in sewer infrastructure needs due to rezoning and subsequent residential development of either site would be reviewed by the Town (Public Works) at the time of the application, along with sanitary sewer utilities connections and capacity, which could include studies of specific pipe segments as determined by Public Works. It is likely a sewer lateral line would be extended from the sewer main in the street to sever the multi-family opportunity sites. Required improvements would be conditioned as part of the tentative map or building permit. With respect to impacts associated with new wastewater infrastructure needed for the Tobin Clark site, see Impact UTS-3.

As future individual housing projects are proposed within the Planning Area, specific wastewater-related infrastructure needs of any particular development would be reviewed by Public Works staff (e.g., specific pipe segment studies, sewer capacity studies) for related service needs, including laterals or any pipeline upgrades. Impacts would be expected to be limited to construction-period impacts, which could include pavement cutting, trenching, digging, vegetation removal and drainage crossings, and pipeline placement or replacement, and which impacts would typically occur within either existing public rights-of-way, Town property, a project development site, or private property subject to a municipal easement. In general, these construction period impacts would include air emissions (dust), loss of vegetation, noise, and traffic interruption and would be reduced through mandatory Town of Hillsborough construction mitigation procedures (see Chapters 4.2 [Air Quality], 4.3 [Biological Resources], and 4.4 [Cultural Resources and Tribal Cultural Resources], of this EIR). Except for the Tobin Clark site (discussed below) no additional significant environmental impact would be anticipated with such construction activity beyond those already identified in this EIR. However, each development application would be reviewed by the Town to determine whether the impacts are addressed in this Program EIR or whether additional CEQA review is required. If project-specific impacts are not covered in this Program EIR, additional CEQA analysis would be required. Implementation of the Town's development review process would ensure the Project's potential incremental impacts associated with wastewater-related service and infrastructure would be reduced or avoided. Therefore, this potential impact would be considered ***less than significant***.

Impact UTS-3 –Impacts Due to New Wastewater Infrastructure for the Tobin Clark Site. *[Threshold of Significance (a)]*

The nearest wastewater utility connection to the Tobin Clark Site would likely be through the College of San Mateo and the City of San Mateo. However, there is no certainty that this could be arranged, even if desired by a project developer. Connecting to a sanitary sewer supplier outside of the Town would be a planning decision to consider when a development proposal for the site is submitted. More detailed information would be needed to confirm the appropriate

selection of a sanitary sewer supplier, and further studies on specific pipe segments and pump station would also be necessary.

Therefore, this Program EIR analyzes the potential environmental impacts of extending a sanitary sewer line from within the Town to the Tobin Clark site. This extension would likely be from the Brooke Court area and travel through a steep, vegetated area to reach the proposed area of development. Environmental impacts resulting from the construction of this pipeline would include impacts to biological resources and potential impacts to aesthetics from loss of vegetation, unknown cultural and tribal resources, and hydrology and water quality impacts from erosion and siltation.

The Town recently retrofitted the lift station at the end of Brooke Court. The pumps and wet well at this location and would have to be reevaluated based on anticipated sewage flows from new development on the Tobin Clark site. Wastewater generation for the proposed 100 units would be approximately 20,700 gallons per day (gpd), based on wastewater unit factors included in the WCSMP; this would represent approximately 2.75 percent of Townwide residential wastewater generation.[52]

New infrastructure necessary to provide wastewater service connection to the Tobin Clark site could require extensive vegetation removal and may require removal of riparian vegetation, the crossing of one or more creeks, and potential disturbance of sensitive habitat, all of which would significantly adversely affect biological resources. Impacts related to proposed wastewater infrastructure improvements would be uncertain without specific information pertaining to capacity of existing facilities and projected needs based on specific project information. However, considering the existing biological conditions and topography of the site and environs and that new pipelines or pipeline extensions and/or connections would be necessary, this would be considered a ***significant impact***.

Impact UTS-2: Construction of utility service pipelines (water, wastewater, storm drain) to serve the Tobin Clark site could impact sensitive biological resources.

Mitigation Measure UTS-2: Implement Mitigation Measure UTS-1.

Implementation of Mitigation Measure UTS-2 would reduce utility infrastructure construction impacts from the Tobin Clark site to ***less than significant***.

Stormwater Drainage

Stormwater runoff in the Town is collected by the storm drain system and discharged to several creeks that generally run from west to east, towards San Francisco Bay. The largest of seven primary drainage systems is San Mateo Creek; the other systems include Easton Creek, Sanchez Creek, Terrace Creek, Ralston Creek, Burlingame Creek, and Borel Creek. The storm drain system consists of a series of pipes, primarily corrugated metal pipe (CMP) and reinforced

[52] WCSMP, p. 3-6. As indicated in Table 3.2, "Wastewater Unit Factor Analysis," prepared by Akel, and using the wastewater generation factor of 207 gpd per dwelling unit, Townwide residential wastewater flows (average dry weather flow) would be 752,815 gpd. Estimated Tobin Clark wastewater (20,700 gpd) divided by 752,815 gpd = approximately 2.749, or 2.75.

concrete pipe (RCP), catch basins, inlet and outfall structures, manholes, and trash racks; however, the creeks are the primary storm conveyance through Town.

The Town's Storm Drain Master Plan (2015) describes the existing storm drain system, evaluates deficiencies, and recommends corrective measures to be implemented over a 30-year period. Some of these measures include upsizing pipes, adding new pipes, or extending existing pipes, and upgrading culverts to allow greater flows to creeks. The Master Plan prioritizes the efforts based on the severity of the deficiencies identified. The Town also has two separate programs for improvements across Town: (1) the "Miscellaneous Storm Drain Repairs Program," with a biennial budget of $120,000, and (2) the "Stormwater Master Plan Replacement Program," with an annual budget of $1,200,000. There are replacement projects for specific locations around Town, such as replacement of high priority storm drains (which are susceptible to or have experienced failure due to age and rust); these projects are identified in the Stormwater Master Plan and noted in the Town's Capital Improvement Plan.

Municipal Code Chapter 13.54 establishes storm drainage charges to pay for implementing the National Pollutant Discharge Elimination System (NPDES) Stormwater Pollution Prevention Program, as mandated by federal law, with the annual storm drainage charge determined by the city council as necessary to meet the Town's costs associated with this program.

Municipal Code Section 16.28.010 regarding improvements for subdivisions requires new subdivisions to include stormwater drainage, culverts, bridges, drains, pumping stations, and removal of vegetation from street rights-of-way as may be necessary, and any other improvements necessary to the use of such public improvements or necessary for public safety.

Generally, development associated with implementation of the proposed Project would occur within already developed urban areas, and compliance with required stormwater management regulations would address new impervious surfaces and the associated stormwater runoff. The Town has stormwater infrastructure available around the areas proposed for development to serve all the new housing, which would include all ADU locations, all Housing Opportunity Sites, all the Subdivision/Lot Split Sites, and three of the Multi-Family Sites (the exception being the Tobin Clark parcel), though as indicated in the Stormwater Master Plan, some of the existing infrastructure is old or undersized. Stormwater runoff generated by new development is specific to the amount of new impervious surface proposed by the project and thus this Program EIR is not able to estimate the amount of increase in stormwater runoff likely to occur under the proposed Project. Project-specific stormwater flow calculations would be required for any future residential development facilitated by the proposed Project to ensure compliance with Town development standards and the MRP; and more detailed information would also be needed to confirm the adequacy of storm drain infrastructure for future individual housing proposals as they are submitted.

According to the Town Public Works Department, the stormwater master plan identifies storm drain infrastructure around the areas proposed as high priority, medium priority, or low priority for replacement. In addition, the Town requires all development to maintain the existing drainage pattern and stormwater runoff off the site, when comparing the pre- and post-development conditions, to ensure that there are no significant effects on to the Town's storm system capacity as a result of private development. Town has stormwater infrastructure throughout the Town (already serving existing development), which would allow connections from all ADU locations,

all Vacant Opportunity Sites, all the Subdivision/Lot Split Sites, and three of the Multi-Family Sites (the Town Hall site, Nueva School, and Burlingame Country Club; the exception is the Tobin Clark site, “below” under Impact UTS-4).

Impacts of ADUs: The Town (Public Works) would review new project applications for stormwater utilities connections and capacity, which would include review to determine if proposed development would maintain the existing drainage pattern and stormwater runoff off the site when comparing the pre- and post-development conditions. Required improvements would be conditioned as part of the tentative map or building permit.

Impacts of Vacant Opportunity Sites: The Town (Public Works) would review new project applications for stormwater utility connections and capacity, which would include review to determine if proposed development would maintain the existing drainage pattern and stormwater runoff off the site when comparing the pre- and post-development conditions. Required improvements would be conditioned as part of the tentative map or building permit.

Impacts of Subdivision/Lot Split Opportunity Sites (*2260 Redington Road, 50 Brooke Court, Hayne Road):* Similar to vacant opportunity sites, the Town (Public Works) would review new project applications for stormwater utilities connections and capacity, which would include review to determine if proposed development would maintain the existing drainage pattern and stormwater runoff off the site when comparing the pre- and post-development conditions. Required improvements would be conditioned as part of the tentative map or building permit.

Impacts of Multi-Family Opportunity Sites (*Nueva School, Burlingame Country Club, Town Hall Complex, Tobin Clark):* The Town (Public Works) would review new project applications for stormwater utilities connections and capacity, which would include review to determine if proposed development would maintain the existing drainage pattern and stormwater runoff off the site when comparing the pre- and post-development conditions. Required improvements would be conditioned as part of the tentative map or building permit. With respect to impacts associated with new stormwater infrastructure needed for the Tobin Clark site, see Impact UTS-4.

As noted above, Town project review, including Public Works determination whether a new development proposal would maintain the existing drainage pattern and stormwater runoff off the site when comparing the pre- and post-development conditions, would ensure that a new housing development would comply with Town Municipal Code requirements enacted to implement the Clean Water Act. Because of the unknown nature of any particular development proposal and the amount of impervious surface associated with it, this Town review of specific stormwater-related infrastructure needs would provide for ensuring that there are no significant effects on the Town’s storm system capacity due to private development as part of the normal project review process for future individual residential projects proposed within the Planning Area. For those projects that require subdivision, the Town’s standards for development (Municipal Code Title 16 Subdivisions) would apply, including CEQA review.

Impacts from new stormwater infrastructure connections would be expected to be limited to construction-period impacts, which could include pavement cutting, trenching, digging, vegetation removal and drainage crossings, and connections to existing culverts, which typically would be temporary and would occur within either existing public rights-of-way, Town property, a

project development site, or private property subject to a municipal easement. These construction period impacts would include air emissions (dust), vegetation removal and drainage crossings, noise, and traffic interruption and would be reduced through mandatory Town of Hillsborough construction mitigation procedures (see Chapters 4.2 [Air Quality], 4.3 [Biological Resources], and 4.4 [Cultural Resources and Tribal Cultural Resources], of this EIR). Except for the Tobin Clark site (discussed below) no additional significant environmental impact would be anticipated with such construction activity beyond those impacts already identified in this EIR. However, each development application would be reviewed by the Town to determine whether the impacts are addressed in this Program EIR or whether additional CEQA review is required. If project-specific impacts are not covered in this Program EIR, additional CEQA analysis would be required. Implementation of the Town's development review process would ensure the Project's potential incremental impacts associated with stormwater-related service and infrastructure would be reduced or avoided. Therefore, this potential impact would be considered ***less than significant***.

Impact UTS-4 –Impacts Due to New Stormwater Infrastructure for the Tobin Clark Site. *[Threshold of Significance (a)]*

New infrastructure necessary to provide stormwater drainage connection to the Tobin Clark site could require extensive vegetation removal and may require removal of riparian vegetation and the potential disturbance of sensitive habitat. In addition, and if not conveyed to a culvert, stormwater flows from a new development on the site could directly affect creeks. All of these would significantly adversely affect biological resources. Though there are storm drain pipelines in the general area around the Tobin Clark parcel, including within the College of San Mateo and in the Town's streets below the site, a site development plan with specific stormwater flow calculations would be necessary to determine the potential effects of proposed development on that site to ensure compliance with Town or City of San Mateo development standards and the adequacy of storm drain infrastructure to serve the site. Impacts related to proposed stormwater infrastructure improvements would be uncertain without specific information pertaining to existing facilities and projected needs based on specific project information. However, considering the existing biological conditions and topography of the site and environs and that new pipelines or pipeline extensions and/or connections would be necessary, this would be considered a ***significant impact***.

Impact UTS-1: Construction of utility service pipelines (water, wastewater, storm drain) to serve the Tobin Clark site could impact sensitive biological resources.

Mitigation Measure UTS-3: Implement Mitigation Measure UTS-1. When a project proposal is submitted to the Town, the Tobin Clark proposal shall be evaluated for consistency with the certified Final EIR for the Project (e.g., compliance with the Final EIR mitigation measures for the Project).

Implementation of UTS-3 would reduce utility infrastructure construction impacts from the Tobin Clark site to ***less than significant***.

Electricity, Natural Gas, and Telecommunications

The discussion of electricity, natural gas, and telecommunications that follows would apply to all proposed housing sites.

Electrical power and natural gas services to the Planning Area are provided by Pacific Gas & Electric Company (PG&E) Telecommunication services would be provided by AT&T, Verizon, T-Mobile, or other service providers in the area. Each of these companies has its own master service plans for regional and local electrical lines, gas pipelines, and telecommunications cables. These master plans are based in part on the land uses and growth projections in the general plans of the various jurisdictions within each particular company's service area. Potential population increases resulting from implementation of the Project may have incremental effects related to electric power, natural gas, and telecommunication, which could create the potential need for new or upgraded facilities. New or upgraded facilities would be reviewed individually, if and when proposed, and would need to comply with adopted, mandatory environmental regulations, including CEQA. This potential impact would be ***less than significant***.

Impact UTS-5 – Project Water Supply Impacts. *[Threshold of Significance (b)]*

Because the RHNA has been included in the most recent (2020) UWMP and no individual project proposal would trigger the need for a separate water supply assessment because of the small size of the residential development projects, the discussion of project water supply impacts that follows would apply to all proposed housing sites.

As the water supplier, the Town is required to prepare an UWMP, which provides a framework for long term water supply and evaluates existing water conservation efforts. The UWMP is required to be updated every five years. As described in the current UWMP, the Town of Hillsborough is expected to have adequate water supplies during normal years to meet its projected demands through 2045, but as a result of potential uncertainties regarding implementation of the Bay-Delta Plan Amendment, SFPUC may require water rationing in single- and multiple- dry year events, with dry year supply shortfalls projected between 45 percent to 54 percent compared to projected 2025-2045 wholesale water demand. As required by state law, the Town has prepared a Water Shortage Contingency Plan. The Water Shortage Contingency Plan addresses the Town's potential water shortage conditions and is designed to be consistent with SFPUC's water shortage contingency planning.

The Town's 2020 UWMP includes a projected population based on 2019 U.S. Census population numbers adjusted by the Town's 6th Cycle RHNA (554 units), using a national average of 2.52 persons per household. For purposes of the UWMP, the Town estimates a total population of 12,783 with buildout of the Project. As discussed previously, one hundred percent of the Town's water is purchased from the SFPUC, and the Town has no other sources or planned sources of water. The Town does not use groundwater nor does it have or plan to install recycled water infrastructure.

In determining water supplies, the UWMP considered the RHNA-required 554 units but did not include the 51 additional housing units identified in the Housing Element as "buffer units."[53] Therefore, for water supply purposes, 554 units represent maximum buildout under the Project. It should be noted that of the 554 RHNA units, 400 are ADUs (Housing Element Approach 1). The ADU's would generally house fewer people than a standard single-family house and would likely use minimal water for landscaping since the ADU is located on an already landscaped residential lot. Additionally, the four multi-family Housing Opportunity Sites (Housing Element Approach 5) would likely use less water than a single-family house because there would likely be fewer people living in some of the units and the multi-family sites would not have the same landscape irrigation needs as a typical single-family 0.5-acre lot in Hillsborough.

As explained in the UWMP, the Town has an individual supply guarantee with SFPUC for 4,585 acre-feet (AF) per year during normal water years. With Project buildout, the Town would be expected to require a total of 3,738 AF by 2030 (approximate full buildout year), decreasing to 3,669 AF by 2045 (due largely to anticipated infrastructure improvements reducing losses from water system leaks) and therefore would have a sufficient water supply. However, for a single dry year and for multiple dry year conditions, the UWMP notes that SFPUC used conservative future dry year planning projections based on implementation of the Bay Delta Plan amendment, which could have serious effects on SFPUC water supplies. Therefore, the Town also incorporated these conservative water supply assumptions to be consistent with SFPUC.

During the first two years of Bay Delta Plan amendment implementation, Hillsborough would have sufficient water supply to meet its water demand. However, by the third year of implementation, the Town could experience a significant water supply shortfall, which would necessitate the Town to implement its Water Shortage Contingency Plan (WSCP) to reduce demand and meet the water supply shortage. As explained in the UWMP (p. 110): "It should be noted that during the 2014-2017 drought, Hillsborough was compelled to reduce water use by 36% as compared to 2013 water use, and ultimately achieved a 41% water use reduction." As a note, during 2020 (also a drought year), the Town reduced its water demand to 234 gallons per capita per day (gpcpd).

The Town's WSCP addresses potential water supply deficiencies ("shortfalls") by designating six water shortage levels (or "stages") that are determined by the water supplier, based on water supply conditions, consistent with State law. The six stages range from up to 10 percent to greater than 50 percent supply reductions. The Town intends that this system of water use reductions from the WSCP will address any projected supply shortfalls.

In addition, the Land Use Element includes one policy and one action related to water conservation: Policy LU-4.6 calls for continuing to maximize the efficiency of water use throughout the Town, and Action LU-1.2 states the Town's intention of enforcing its Residential Landscaping requirements to promote water conservation. The Open Space and Conservation Element also includes one action, Action OSC-4.3, addressing the Town's desire that property owners incorporate water conservation techniques into their landscaping to reduce water usage.

[53] Recommended by the State Department of Housing and Community Development, these "buffer units" would be available in case one or more proposed housing sites proves undevelopable and a replacement is required.

Municipal Code Chapter 15.29 establishes requirements and standards for water conservation in landscape projects.

Furthermore, as specific projects are proposed within the Planning Area, potential water-related impacts would be evaluated and identified, along with measures to mitigate any significant impacts, as part of the CEQA compliance process for future project-specific proposals. Compliance with Town Municipal Code and General Plan policies would ensure impacts of the Project on water supply would be ***less than significant***.

Impact UTS-6 – Wastewater Treatment Capacity Impacts. *[Threshold of Significance (c)]*

The discussion of wastewater treatment capacity impacts that follows would apply to all proposed housing sites.

As discussed previously, the Burlingame WWTP has a design capacity to treat 5.5 million gallons per day (mgd) of wastewater per day and 16 mgd during wet weather. During the dry season, more than 80 percent of the average dry weather flow of 3 mgd comes from the City of Burlingame, with the Town of Hillsborough contributing, on average, approximately 0.4 mgd (or, about 13 percent of the total average dry weather flow for the Burlingame WWTP). The Town contribution represents approximately seven percent of the Burlingame WWTP design capacity. The San Mateo WWTP has an existing design capacity of 40 mgd and is currently planning to increase plant capacity to 78 mgd. During the dry season, the plant treated an average daily dry weather flow of 10.0 mgd. With approximately 40 percent of the Town's average daily wastewater flowing to the Burlingame WWTP, the remainder flows to the San Mateo WWTP (60 percent, or 0.6 mgd; about six percent of the total average dry weather flow for the San Mateo WWTP). This would represent less than two percent of the San Mateo WWTP design capacity.

According to the Wastewater Collection System Master Plan Update, which based future wastewater flow projections on the planning assumptions from the Town's 2020 UWMP, a wastewater generation rate of 207 gallons per day (gpd) was used for each residential unit associated with implementation of the Project, which results in a total wastewater generation from the Project of approximately 114,678 gpd, or approximately 0.11 mgd. The Town's portion (40 percent) of this Project-generated increase of 0.11 mgd conveyed to the Burlingame WWTP (0.044 mgd) would represent an approximately 1.5 percent increase in total average dry weather flow for the Burlingame WWTP (and an approximately 0.8 percent increase in WWTP design capacity).

For the San Mateo WWTP, the Town's portion (60 percent) of this Project-generated increase of 0.11 mgd (0.066 mgd) would represent an approximately 2.2 percent increase in total average dry weather flow at the San Mateo WTTP (and an approximately 1.2 percent increase in WWTP design capacity). Because these increases in wastewater flow would not represent substantial increases or exceed the design capacity of either WWTP, Project-related wastewater generation impacts on treatment facilities would be considered ***less than significant***.

It should be noted that these two wastewater facilities serve other jurisdictions as well, and it is possible that incremental increases in demand, as anticipated under the Project, in conjunction with increased demand for other communities could result in the need for future new or expanded wastewater treatment facilities. As noted previously, although the San Mateo WWTP

is currently undergoing planning for an expansion of existing facilities (including its own CEQA review), any other future expansion of existing facilities or construction of new facilities would be required to undergo environmental review pursuant to CEQA. This potential impact would therefore be considered ***less than significant***.

Impact UTS-7 – Solid Waste Generation Impacts. *[Threshold of Significance (d)]*

The discussion of solid waste generation impacts that follows would apply to all proposed housing sites.

Implementation of the Project would result in an increase in residential units within the Town, and an associated increase in solid waste generation. The Town would continue to implement a variety of solid waste reduction, recycling, and reuse measures to meet its obligation under AB 939, such as a three-cart collection system for residential trash, recyclables, and organics (e.g., food waste and yard waste); curbside collection recycling service for household batteries and phones; and a construction & demolition (C&D) debris recycling program.

According to CalRecycle, the Town of Hillsborough disposed of approximately 8,928 tons of solid waste in 2019,[54] which would be about 13.05 pounds per day per household. Implementation of the proposed Project is estimated to result in a population increase of approximately 1,274 residents (554 households), and the net new waste generated associated with the increase in residents would be 7,229.7 pounds per day or 1,319 tons per year (approximately 3.61 tons per day).

The Corinda Los Trancos Landfill (Ox Mountain) currently has a throughput limit of 3,598 tons per day and is expected to remain operational through 2034.[55] The increase in solid waste associated with implementation of the Project would be less than one percent of the landfill's daily capacity. As this facility does provide service to other jurisdictions, there is a possibility of exceeding the landfill's current permitted capacity. Any proposed new or expanded solid waste facility would need to comply with adopted mandatory environmental regulations, including CEQA. This potential impact would be ***less than significant***.

Impact UTS-8 – Compliance with Solid Waste Statutes and Regulations. *[Threshold of Significance (e)]*

The discussion of compliance with solid waste statutes and regulations that follows would apply to all proposed housing sites.

Any individual future project completed under the Focused GPU would be required to comply with all applicable federal, state, and local statues and regulations related to solid waste management and reduction (minimization and recycling). This impact would be ***less than significant***.

[54] CalRecycle, Jurisdiction Disposal and Alternative Daily Cover (ADC) Tons by Facility, website: https://www2.calrecycle.ca.gov/LGCentral/DisposalReporting/Destination/DisposalByFacility (accessed August 19, 2023).

[55] CalRecycle, SWIS Facility/Site Activity Details Corinda Los Trancos Landfill (Ox Mtn), website: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1561?siteID=3223 (accessed August 19, 2023).

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4.16 Wildfire

4.16.1 Environmental Setting

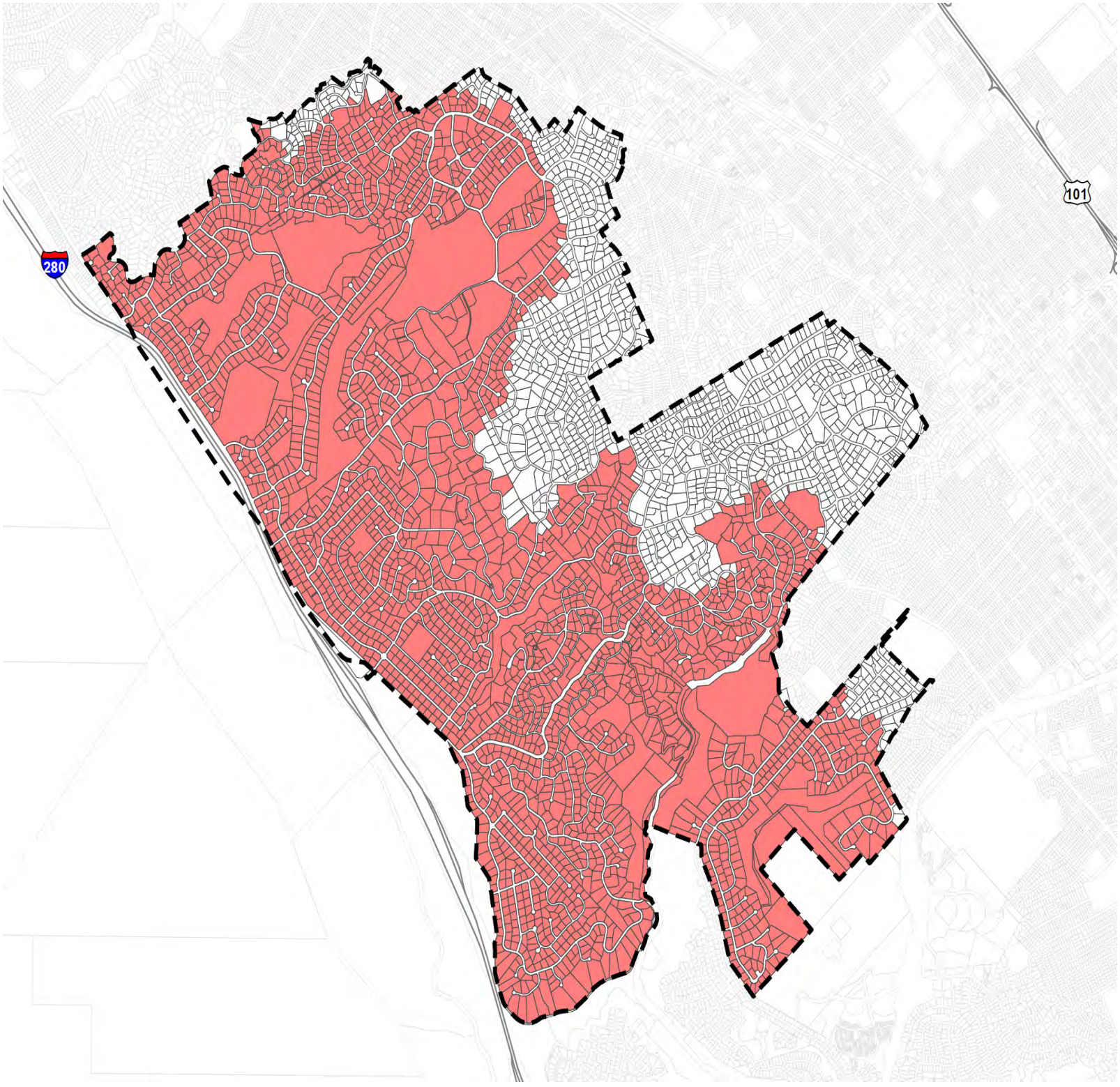
Wildland Urban Interface, Fire Hazard Severity Zones, and Wildfire Responsibility Areas.

The Town of Hillsborough is located on the Central Pacific west coast of California, which is generally characterized by a Mediterranean climate (Town of Hillsborough 2021). The wet season typically occurs between November and April, accounting for 90% of annual precipitation, with little-to-no precipitation occurring during the summer months. Average precipitation is approximately 20 inches per year. The average summer temperature is around 78 degrees and the average winter temperatures is around 58 degrees. The long summer dry periods and frequent droughts produce an annual fire hazard that contributes to a highly predictable fire regime.

The Planning Area has a hilly topography and includes areas with steep slopes and ravines, with elevations ranging from approximately 20 to 30 feet mean sea level (MSL) in the east (near El Camino Real) rising to approximately 600 to 700 feet MSL in the west (near I-280). While the Town's street layout minimizes through traffic and creates a more rural character for the community, the often narrow and curvilinear patterns and hilly topography can make it difficult for emergency vehicles to travel from one side of the community to the other and access certain areas. Additionally, many roads do not have turnouts or turnarounds, which are critical in facilitating the effective emergency response of fire protection service vehicles.

Hillsborough contains undeveloped land within its limits, such as rural canyons and open space areas, and is located adjacent to the Golden Gate National Recreation Area, an expansive natural recreational area and San Francisco Public Utilities Commission watershed lands associated with the Crystal Springs Reservoirs west of I-280. The proximity of housing and other development to these areas carries a high risk of wildland fires. As shown in Figure 4.16-1, much of Hillsborough's development is located in the Central County Fire Department's designated Wildland Urban Interface (WUI) area, a transition zone between areas of native vegetation and developed areas. The Central County Fire Department last updated the Hillsborough WUI map in 2019. Currently, approximately 70 percent of the Town is considered land within the WUI (Town of Hillsborough 2023).

The California Department of Forestry and Fire Protection (CAL FIRE) is required by law to map areas of significant fire hazards based on fuels, terrain, weather, and other relevant factors. These zones, referred to as Fire Hazard Severity Zones (FHSZ), influence how people construct buildings and protect property to reduce risk associated with wildland fires.



Source: Town of Hillsborough

Legend

Hillsborough Town Limits

Parcel in 2019 WUI

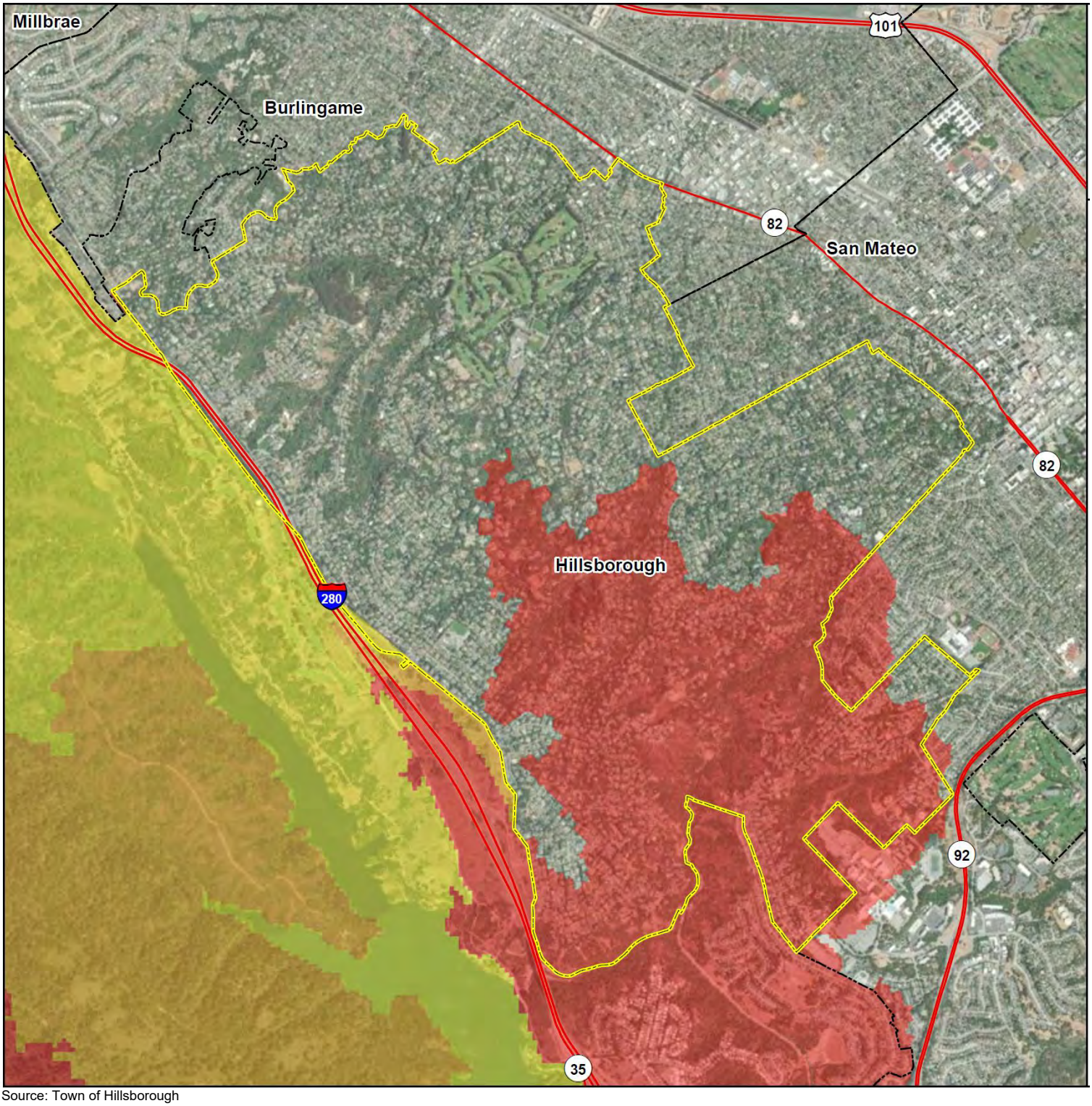
Parcel not in 2019 WUI

0 1,500 3,000

Feet

N

Figure 4.16-1 Designated Wildland Urban Interface



Source: Town of Hillsborough

Legend

- Moderate
- High
- Very High
- Hillsborough Town Limits
- Incorporated Cities

0 0.2 0.4 0.8 Miles

N

Figure 4.16-2 Fire Hazard Severity Zones

Town of Hillsborough 6th Cycle Housing Element Update Draft EIR

MIG

The designated Town WUI encompasses all portions of the Town recommended by CAL FIRE for VHFHSZ designation and includes additional areas not included in CAL FIRE's VHFHSZ.

Fire protection in California is the responsibility of either the federal, state, or local government. On federally owned land, or federal responsibility areas (FRA), fire protection is provided by the federal government, often in partnership through local grants and contracts. In state responsibility areas (SRA), which are defined according to land ownership, population density, and land use, CAL FIRE has a legal responsibility to provide fire protection. CAL FIRE is not responsible for densely populated areas, incorporated cities, agricultural lands, or federal lands. Local responsibility areas (LRA) include incorporated cities and cultivated agriculture lands. In LRAs, fire protection is provided by city fire departments, fire protection districts, or counties, or by CAL FIRE under contract to local government. The Town of Hillsborough is the designated LRA, and fire protection within Town boundaries is provided by the Central County Fire Department. The Town is bordered by SRA lands comprising the Golden Gate National Recreation Area (GGRNA) to the west.

The San Francisco Public Utilities Commission owns extensive land within CCFD's jurisdiction, including lands within the Planning Area. SFPUC-owned parcels in the Planning Area include nine parcels clustered in two locations: the canyon along Crystal Springs Road and the open space north of Hayne Road bound by existing homes along West Santa Inez Avenue, San Raymundo Road, and La Canada Road. These parcels are largely undeveloped and extensively vegetated and, as such, present a high risk of wildfire ignition and facilitating the spread of wildfire. Additionally, the SFPUC parcels are located in the Town's WUI adjacent to existing neighborhoods.

SFPUC is responsible for vegetation management and wildfire risk reduction on its properties. The SFPUC has prepared a Wildfire Mitigation Plan (WMP) (2021) in response to California Senate Bill (SB) 901 (2018), amended Public Utilities Code (PUC) § 8387, Chapter 6, Wildfire Mitigation. PUC section 8387 (b)(1), which requires: "After January 1, 2020, a local publicly owned electric utility or electrical cooperative shall prepare a wildfire mitigation plan annually and shall submit the plan to the California Wildfire Safety Advisory Board (WSAB) on or before July 1 of that calendar year." The SFPUC's 2021 WMP updates and/or revises SFPUC's existing programs to construct, maintain, and operate their electrical facilities to minimize the risk that their equipment could be the origin or contributing source for a catastrophic wildfire.

SFPUC's WMP categorizes the lands under its jurisdiction into Fire Threat Tiers. SFPUC lands in Hillsborough are categorized under Tier 2, which includes areas where there is an elevated risk (including likelihood and potential impacts on people and property) from utility associated wildfires. The objectives of the WMP include minimizing sources of ignition, improving the reliability of SFPUC's electric grid, and measuring the WMP's effectiveness and performance. The WMP's activities include vegetation management, transmission line vegetation clearance inspections, distribution line vegetation clearance inspections, and transmission and distribution line maintenance.

Certain facilities and infrastructure within the Planning Area are particularly vulnerable to wildfire impacts due to difficulty to evacuate the facility during a wildfire event (e.g., schools and assisted living facilities) or an inherent vulnerability to wildfire and compounding effects on the community that would occur in the event of loss of or significant damage to these facilities (e.g.,

water tanks, substations, and pipeline infrastructure, water pump facilities, and cell towers). According to the Town of Hillsborough's Zonehaven Evacuation Pre-Plan, critical evacuation facilities (i.e., the most vulnerable facilities during a disaster event) in the Planning Area during an evacuation include the North Elementary School, South Elementary School and Preschool, West Elementary School and Preschool, Crocker Middle School, The Bridge School, Crystal Springs Upland School, The Nueva School, Hoover Elementary School, La Petite Montessori School, Carolands Chateau (a California Historical Landmark listed on the National Register of Historic Places), Burlingame Country Club, Vista Park, care homes, and day care facilities (Town of Hillsborough 2023).

Critical public facilities within the Town which if lost or significantly damaged due to a wildfire could adversely impact wildfire response and recovery efforts include the Public Works Administration (SCADA), Police Department, Fire Stations, and Town Hall buildings, which lack adequate backup power and may not be able to provide critical emergency services to the community in the event of a Public Safety Power Shutoff (PSPS) event or power outage as a secondary effect of wildfire (County of San Mateo 2021). Critical infrastructure that would be most vulnerable to wildfire includes water tanks, including those located on Tournament Road, substations, cell towers, and water and other pipelines, which may burst due to the extreme levels of heat produced by wildfire.

According to the San Mateo County Multi-Jurisdictional Local Hazard Mitigation Plan (LHMP), Hillsborough has not experienced a wildfire greater than 10 acres since 1940 based on CAL FIRE data (County of San Mateo 2021).

Housing Opportunity Sites

Many of the Housing Opportunity Sites identified in the Draft 2023 – 2031 Housing Element are located within the Town's designated WUI. All proposed Subdivision/Lot Split Opportunity Sites are located within the WUI. All Multi-Family Opportunity Sites except the Town Hall Complex Opportunity Site are located in the WUI. 18 of the 23 Vacant Housing Opportunity Sites are located in the WUI. Considering ADUs can be constructed on residential parcels in the Town, any future ADU site may be located within the WUI. It should be noted that because a large percentage of Hillsborough (approximately 70 percent) is located within the WUI, many parcels that are not located in the WUI itself are located either adjacent to or in close proximity to the WUI and, as a result, are still at an elevated risk of wildfire. Therefore, all identified Housing Opportunity Sites are at risk due to wildfire. The implications of the development of the Housing Opportunity Sites in the WUI as it relates to wildfire risks are discussed in further detail in Section 4.16.4.

Wildfire Preparedness and Response.

Central County Fire Department (CCFD)

The Central County Fire Department (CCFD) provides fire protection services to the Town of Hillsborough, the City of Burlingame, and the City of Millbrae. Formed in April 2004, the CCFD provides all-risk fire protection, emergency medical and community risk reduction services to 70,000 residents and tens of thousands of visitors each year. The CCFD operates out of six professionally staffed fire stations, in addition to an administrative headquarters and training

facility. The CCFD operates six fire stations, fire engines, Urban Search & Rescue units, including a State of California Type I heavy rescue Urban Search & Rescue (USAR) unit, a MED CAT armored vehicle, and a Type 6 wildland unit. Two of CCFD's fire stations are located within the Town's borders. CCFD is also a participant in a County automatic aid agreement, which uses the County's mapping program to identify the closest fire engine. San Mateo County dispatch uses AVL (automatic vehicle locator) and dispatches the closest resource regardless of jurisdiction (Correspondence with Patricia Koch 2023).

The Hillsborough Wildland Urban Interface Program established in 2019, is a CCFD Program intended to reduce community wildfire risk in the high fire risk areas of Hillsborough. As part of the WUI Program, the CCFD conducts vegetation management inspections for properties within the Town's WUI area. The WUI Program also provides vegetation management and other wildfire risk reduction resources for residents within the WUI area. The WUI Program's defensible space requirements are adopted from the 2018 ICC WUI Code and California Fire Code.

The WUI Program is the CCFD and Town's key program for reducing fire risk through vegetation management.

Fire Safe San Mateo County

Fire Safe San Mateo County (FireSafe SMC) was formed in 1987 to address the potential for serios loss or life and property in the urban/wildland interface areas (hillside neighborhoods that are surrounded by dense vegetation that are threatened by wildfire in San Mateo County. Fire Safe SMC was the first Fire Safe council formed in California. Fire Safe SMC's goals are to reduce hazardous vegetation, create defensible space around structures, and educate the public about wildfire fire hazards, fire behavior, and fuel reduction through the guidance of local agencies and public/private partnerships. Fire Safe SMC partners with member jurisdictions, including the Town of Hillsborough and CCFD, to implement these goals. The CCFD works to implement Fire Safe SMC's regional approaches to fire protection and suppression.

Hillsborough Fire Code

Additionally, the Town's Fire Code (Municipal Code Chapter 15.21) and Wildland-Urban Interface Code (WUI Code) (Municipal Code Chapter 15.21) prescribe regulations governing conditions hazardous to life and property from fire or explosion. Through the Fire Code, the Town has adopted the California Fire Code, the International Fire Code, and California Public Resources Code, Division 4, Section 4291, with local amendments specific to Hillsborough. While the Fire Code applies to all properties throughout the Town, the Town's WUI Code applies only to approximately 70 percent of land within the Town designated as wildland urban interface (WUI). As noted above, the designated Town WUI encompasses all portions of the Town recommended by CAL FIRE for VHFHSZ designation and includes additional areas not included in CAL FIRE's VHFHSZ. The purpose of the WUI Code is to promote the public health, safety, and welfare by helping prevent the spread of fire from the Town's wildland areas to the Town's inhabited areas and vice versa and to provide a system for the issuance of permits and collection of fees in furtherance of these purposes, all of which is consistent with Action PS-1.3 of the Town's General Plan.

The Town's WUI Code adopts the International Wildland-Urban Interface Code with local amendments specific to Hillsborough. Specific regulations of the Town's Fire Code and WUI Code relevant to the Project are presented in Section 4.16.2.

Firefighting Water Supply

The Town of Hillsborough operates a complex water distribution system to supply potable water for domestic use, landscape irrigation, and fire suppression for a service area approximately corresponding with the Town boundaries (Email correspondence with Liz Ruess 2023). The normal source of water is the SFPUC Hetch Hetchy system, but there are interties with neighboring water systems that can supply water in an emergency. The Town stores this water in 15 active storage tanks and one reservoir located at 10 sites located throughout the Town, with a total storage capacity of approximately nine million gallons. The Town's storage system provides the recommended 72 hours of backup water should there be an interruption with water received from the SFPUC Regional system. The water is distributed through approximately 116 miles of water mains by pumping at 14 active pump stations and by gravity.

The Town provides fire/water service to all areas within its boundary. While the Town currently has adequate storage and volume of water, boosters may be necessary to provide adequate pressure for future development, including upper floors of multi-story structures. Fire flows and pressures will need to be verified during the design process of any future development. Areas at the interfaces with neighboring cities receive mutual aid from neighboring Fire Departments.

The future Highline Water Pipeline Project will provide a new seismically reliable pipeline to provide the Town with a redundant point of connection (POC) to the SFPUC's Harry Tracy Water Treatment Plant (HTWTP). The proposed pipeline will improve the Town's water supply reliability in the event of a failure/disruption of service due to a seismic event, water quality issues, and/or public safety power shutoffs. It is anticipated that during these events the Town's existing 10 turnouts may be impacted. The Highline Water Pipeline Project would also provide a water supply along the WUI to increase the Town's and neighboring agencies' ability to provide additional fire suppression resources to protect critical water storage and distribution infrastructure as well as private property improvements.

Emergency Planning and Response

San Mateo County Department of Emergency Management

As required by State law, the Town of Hillsborough has established emergency preparedness procedures to respond to a variety of natural and built environment disasters that could affect the community. In the event of an emergency, the Town will respond according to the Standardized Emergency Management System (SEMS) developed by the State. The SEMS system establishes a hierarchy of response, with local government as the first responders. If Hillsborough does not have sufficient resources to respond to a disaster, the County of San Mateo would lend resources. Mutual Aid agreements between various agencies would be enacted all the way to the State level.

The San Mateo County Department of Emergency Management (DEM) coordinates countywide preparedness, response, and protection services and activities for large-scale incidents and disasters. The DEM is responsible for alerting and notifying appropriate agencies within the

county's 20 cities when disaster strikes; coordinating all agencies that respond; ensuring resources are available and mobilized in times of disaster; developing plans and procedures in response to and recovery from disasters; and developing and providing preparedness materials for the residents. DEM also maintains the County's Regional Operations Center and provides a duty officer on a 24-hour basis to address county, local, and State officials on matters of potential or escalating emergency conditions. The Emergency Services Council, which consists of a representative from each of the 20 incorporated cities and a member of the County Board of Supervisors, governs the DEM.

Hillsborough/Burlingame Emergency Operations Plan

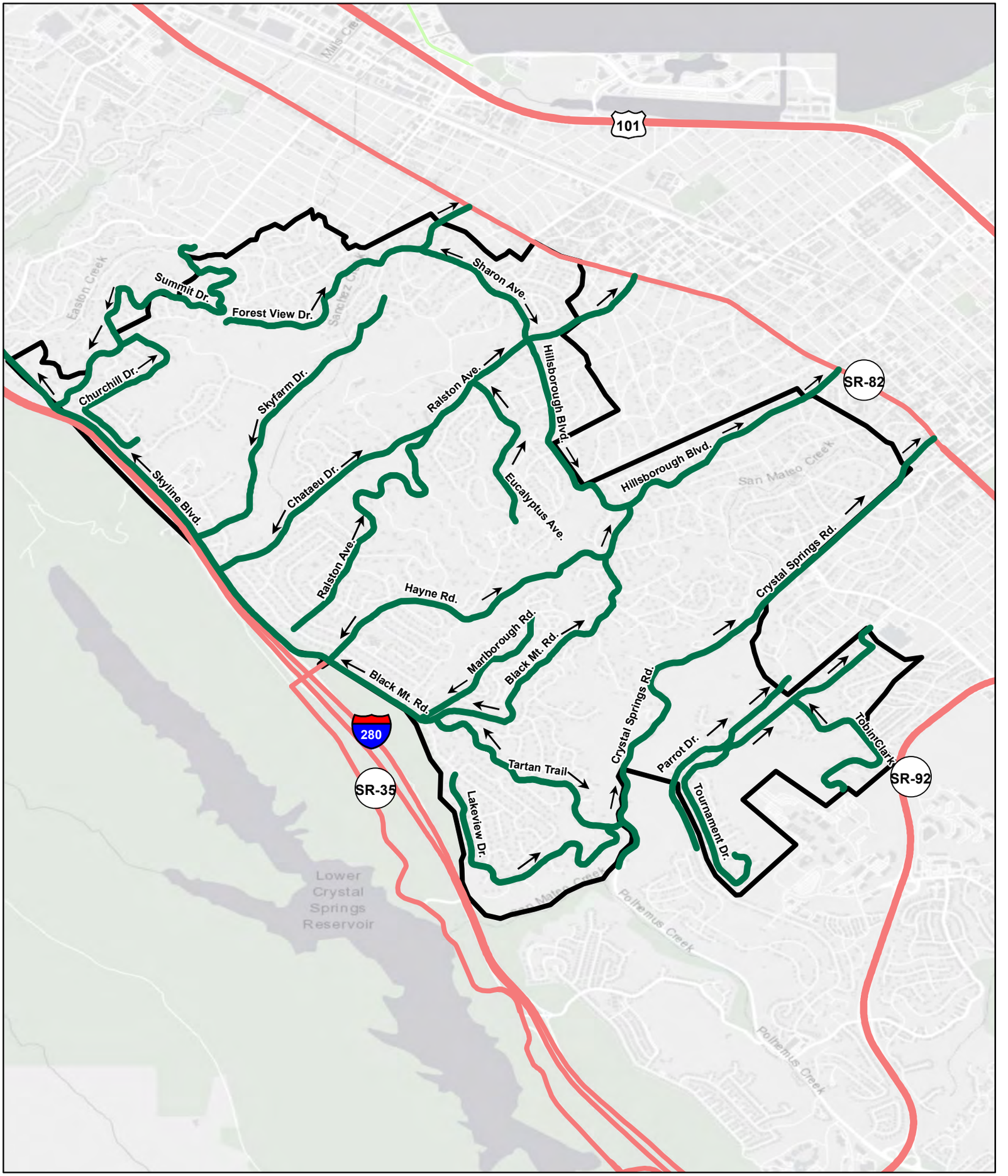
As described in further detail in Section 4.16.2, the Town of Hillsborough and the City of Burlingame have partnered to prepare a joint Emergency Operations Plan (EOP) (2019). The 2019 EOP facilitates disaster response and short-term recovery activities. It contains functional checklists and hazard-specific checklists to be used during disasters and identifies jurisdictional and/or functional area representatives to facilitate collaborative incident management for the EOC Emergency Response Team. The EOP The Town of Hillsborough and City of Burlingame also share a joint Emergency Operations Center (EOC).

Also pertinent to emergency response in the Planning Area, the CCFD hired a full-time Community Risk & Resiliency Specialist to manage all aspects of the Emergency Management Plan for Burlingame and Hillsborough in 2019.

Evacuation

As noted above, CCFD has compiled a list of roadways in the Planning Area it considers potential evacuation routes. These evacuation routes consist predominantly of large arterial streets that travel in the east-west direction toward Skyline Boulevard and I-280 or El Camino Real. The evacuation routes include Sumit Drive, Forest View Drive, Sharon Avenue, Skyfarm Drive, Chateau Drive, Ralston Avene, Eucalyptus Avenue, Hillsborough Boulevard, Black Mountain Road, Marlborough Road, Hayne Road, Tartan Trail, Lakeview Drive, Churchill Drive, Parrott Drive, Tournament Drive, Tobin Clark Drive, Crystal Springs Road, and Skyline Boulevard. Figure 4.16-3 depicts the CCFD’s designated evacuation routes in the Town.

Known issues related to evacuation in the Planning Area include extensive tree canopy cover over some of the evacuation routes, such as Crystal Springs Road. The tree canopy provides a means for the fire to engulf the road, potentially causing tree limbs and branches to fall on the roadway during a wildfire event or damaging the roadway before, during, or after a wildfire event. Additionally, some of the evacuation routes and many of the Planning Area’s neighborhood streets in general contain segments that are steep, narrow in width, and/or winding, and which do not have night street lighting.



Source: Esri 2023

Legend

- Hillsborough Town Limits
- Evacuation Route
- Major Highway

0 0.2 0.4 0.8 1.2 1.6 Miles

N

Figure 4.16-3 Hillsborough Evacuation Routes

Town of Hillsborough 6th Cycle Housing Element Update Draft EIR

The Planning Area also contains many streets with only one point of ingress and egress. Streets with only one point of ingress and egress could become cut off during a swift moving fire or the single point of ingress/egress could obstruct the safe and effective evacuation of residents during an emergency as the road becomes clogged with vehicles attempting to exit the street at one point simultaneously. During an emergency, streets with one point of ingress may also inhibit the effective response of emergency services as emergency medical and fire response vehicles attempt to enter streets through the same ingress/egress point as evacuating passenger vehicles. Examples of roads in the Planning Area that have only one point of ingress and egress include but are not limited to residential streets such as Geri Lane, Cottonwood Court, and Orange Court in the Skyfarm neighborhood; Knightwood Lane in the Hillsborough Oaksbridge neighborhood; Glen Aulin Lane in the Hillsborough Hills neighborhood; Shady Lane, Avondale Road (partial), and Southdown Court in the Lakeview neighborhood; La Senda Road in the Hillsborough Park neighborhood. Many of the streets with one point of ingress/egress in the Planning Area occur in the WUI.

The Planning Area also contains intersections that could become choke points during evacuations. Generally, choke-point intersections could occur where large volumes of traffic are funneled to one location and the flow of traffic is impeded and cannot be bypassed easily. Conditions such as steep terrain and narrow, winding roadways or intersections with extreme turning angles may further exacerbate bottlenecks that may form at choke-point intersections.

SMC Alert

SMC Alert is a software application used to send emergency alerts, notifications, and updates to cell phones, mobile devices, home phones, work, and/or e-mail accounts. The SMC Alert system is managed by the DEM. The service is free to all and is available to all cities, towns, and special districts within San Mateo County. In the event of an emergency, public safety agencies such as the Town of Hillsborough are able to provide emergency information directly to the community. Alerts may also be sent by local fire, police, and emergency operations managers from other cities within San Mateo County. Alert types may include life safety, fire, weather, accidents involving utilities, or roadway or disaster notifications. These messages provide the community with instructions, orders, and updates.

Zonehaven

Hillsborough implements the Zonehaven evacuation system (recently renamed “Genasys Protect”). Zonehaven determines the most efficient and effective evacuation routes based on the emergency type and location. Zonehaven evacuation routes will vary in response to real-time conditions; however, Figure 4.16-3 the roadways most frequently used for evacuations as identified by CCFD.

Zonehaven divides the Town into eight evacuation zones with maps providing information on potential evacuation routes. In 2023, the Town developed in collaboration with Zonehaven an Evacuation Pre-Plan that provides key information for Hillsborough’s eight Zonehaven evacuation zones. The Evacuation Pre-Plan contains a zone map, critical evacuation facilities, potential traffic control points & closures, potential evacuation routes, potential evacuation arrival points, special zone considerations, population, number of passenger vehicles, number of structures, and evacuation agency leads for each of the eight Hillsborough evacuation zones.

It should be noted that the potential evacuation routes listed in the Evacuation Pre-Plan may differ slightly from CCFD's list of evacuation routes in Hillsborough, but CCFD operates in line with Zonehaven's evacuation program.

The Hillsborough Zonehaven Evacuation Pre-Plan identifies narrow, winding roadways in seven of the eight Zonehaven evacuation zones. The Evacuation Pre-Plan identifies additional conditions that may contribute to impeded traffic flow, including roads with switchbacks in two of the eight evacuation zones and roads with no streetlights, which may impede driver and first responder visibility, in seven of the eight evacuation zones.

Post-Fire Hazards

When a wildfire burns the vegetation that helps to stabilize slopes, hillsides may be more likely to slide. Rainstorms that occur following wildfires can potentially destabilize slopes further, leading to post-fire debris flows. These post-fire landslides and debris flows can threaten life and damage property during post-fire storm events, impede post-wildfire recovery efforts by damaging or slowing access to roadways, including evacuation routes, and critical utility infrastructure. According to the California Governor's Office or Planning and Research Fire Hazard Planning Technical Advisory (2022), as climate change increases the probability of more frequent and devastating fires and storms, post-wildfire landslides and debris flows may in turn occur more frequently. The Town's hilly terrain lends itself to increased likelihood of landslide activity throughout the Planning Area. As shown in 4-7 Landslide Hazard Areas in Chapter 4.6 Geology and Soils, a large portion of the Planning Area is moderately to very highly susceptible to deep-seated landslides. The best predictor of where slides might occur is the location of past landslides. Where evacuation routes occur on or at the base of slopes susceptible to slides, post-wildfire debris flows and landslides may compromise the integrity of the route.

4.16.2 Regulatory Setting

Federal Regulations

Federal Disaster Mitigation Act of 2000

The Disaster Mitigation Act of 2000 authorizes the Federal Emergency Management Agency (FEMA) to set mitigation planning requirements for state, local, and Indian Tribal governments as a condition of mitigation grant and disaster assistance and requires close coordination of mitigation planning and implementation efforts between FEMA and jurisdictions.

Healthy Forest Restoration Act of 2003

This Act calls for preparation of Community Wildfire Protection Plans (CWPP) as planning and funding prioritization tools to create incentives for communities to engage in comprehensive fire hazard planning and to help define and prioritize local needs.

State Regulations

California Department of Forestry and Fire Protection (CAL FIRE)

CAL FIRE protects life and property through fire prevention engineering programs, law and code enforcement and education. CAL FIRE identifies areas within LRAs and recommends fire hazard severity zones; CAL FIRE also designates fire hazard severity zones for areas within SRAs.

California Climate Adaptation Strategy (2021)

The California Climate Adaptation Strategy is formulated to strengthen protections for climate vulnerable communities. Part of this Strategy relates to wildfire risk and prevention, such as improving and refining quantitative wildfire risk assessments across California to identify the most wildfire vulnerable communities and populations; supporting wildfire prone communities by expanding the Regional Forest and Fire Capacity Program and increasing local and regional government capacity to build and maintain projects to improve forest health and prevent wildfire; and reducing health impacts of wildfire smoke (including improving wildfire smoke guidance for schools, children, and other vulnerable populations). The Strategy also identifies the need to reduce risk from energy infrastructure-related ignitions that can lead to wildfire. In addition, the Strategy promotes “climate smart” forest management – such as reintroducing prescribed fire onto landscapes – as a means to reduce the threat of wildfire; supports increase in the pace and scale of wildfire resilience and forest health projects; and calls for reducing wildfire risks through increased use of fuel breaks and fuels reduction and expediting the permitting of wildfire resilience projects using exemptions or the California Vegetation Treatment program.

General Plan Safety Element Review: Government Code 65302.5

The Board of Forestry and Fire Protection must provide recommendations to a local jurisdiction’s general plan safety element at the time that the general plan is being amended. Board recommendations include goals and policies that provide for contemporary fire-prevention standards for the jurisdiction. This is not a direct and binding fire prevention requirement for individuals.

Sprinkler Systems: California Residential Code, Chapter 3, Section R313

All new dwellings, dwelling units, and one- and two-family townhomes must be equipped with an automatic fire-sprinkler system that can protect the entirety of the dwelling. Dwellings and homes constructed prior to January 1, 2011 that do not have a sprinkler system may be retrofitted, but it is not required.

Fire Safety Standards: California Public Resources Code 4290 and 14 California Code of Regulations (CCR) 1270

These regulations govern roads, driveway width, clearance, turnarounds, signing, and water related to fire safety throughout California. Public Resources Code 4290 is typically enacted through regulation at the county level, as described below.

Wildland-Urban Interface Building Standards: California Government Code 51189

The Office of the State Fire Marshal is required to create building standards for wildfire resistance. Construction of buildings in the wildland-urban interface must use fire-resistant materials to save life and property. As of 2011, the standards relevant to fire-safe construction for all new structures in the SRA are the California Building Code, Chapter 7A and the California Residential Code, Chapter 3, Section R327.

Government Code §51175-51189 Fire Safe Regulations: Minimum fire safety standards gives the State Board of Forestry the authority to adopt regulations for minimum fire safety standards applicable to SRA lands under the authority of the department, and to VHFHSZs starting on July 1, 2021. The Fire Safe regulations are codified in CCR, Title 14 (Natural Resources), Division 1.5 (Department of Forestry), Chapter 7 (Fire Protection) under Subchapter 2 (SRA Fire Safe Regulations). These regulations generally address the following:

- Standards for signs identifying streets, roads, and buildings.
- Minimum private water supply reserves for emergency fire use.
- Fuel modification standards for fuel breaks and greenbelts.
- Road and driveway standards for emergency fire equipment access and public evacuation.

State Responsibility Area: Public Resources Code 4102, 4125-4229 and 14 CCR 1220

These statutes and regulations establish the locations where CAL FIRE has the financial responsibility for preventing and suppressing fires. These designations define financial arrangements for fire protection services and establish locations where fire safe and defensible space laws or regulations apply.

Defensible Vegetation Clearing Around Structures: Public Resources Code 4291/14 CCR 1299

Public Resources Code 4291 regulates fuel management around a property. It states that a person who owns or controls a building or structure in or adjoining to forest, brush, or grass covered lands shall follow certain guidelines outlined in the code. At least 100 feet of defensible space is required. The owner of the property is liable for making these changes to protect habitable structures. The 100 feet is separated into two zones, with the closer zone, 30 feet out from the structure, being managed more intensively.

AB 38 (2019) California Wildfire Mitigation Financial Assistance Program (Government Code §8654.7 and §8654.10; Public Resources Code §8389.5)

Established a comprehensive wildfire mitigation financial assistance program to encourage cost-effective structure hardening and retrofitting to create fire-resistant homes, businesses, and public buildings. The bill required the State Fire Marshal, in consultation with specified State officials, to identify building retrofits and structure hardening measures, and CAL FIRE to identify defensible space, vegetation management, and fuel modification activities, that are eligible for financial assistance under the program. The bill specifies the types of designated wildfire hazard areas eligible for funding under the program.

AB 1823 (Committee on Natural Resources, 2019) Fire Risk Reduction Communities (Public Resources Code §4290.1)

This bill amended PRC Section 4290.1 to require that, on or before July 1, 2022, the State Board develop criteria for and maintain a list of local agencies considered to be a "Fire Risk Reduction Community" located in the SRA or VHFHSZ, identified pursuant to GC§51178, that meet best practices for local fire planning. Criteria that must be used to develop the Fire Risk Reduction Community list include recently developed or updated CWPPs, adoption of the board's recommendations to improve the Safety Element, participation in Fire Adapted Communities and Firewise USA programs, and compliance with the Board's minimum fire safety standards. For example, any new road in the SRA will need to comply with State regulations governing access. Standards extend to road steepness, curvature, and width.

California Fire Code (California Code of Regulations, Title 24, Part 9)

The Town of Hillsborough has adopted the 2019 California Fire Code, with amendments to address specific local conditions and needs. These provisions include construction standards and fire hydrant requirements, road widths and configurations designed to accommodate the passage of fire trucks and engines, and requirements for the handling and storage of hazardous materials.

California Code of Regulations, Title 19

Title 19, chapters one through six of the California Code of Regulations (CCR), establishes regulations related to emergency response and preparedness under CAL Emergency Management Agency.

California Health and Safety Code (Sections 13000 et seq.)

This statute establishes State fire regulations, including regulations for building standards (also set forth in the California Building Code), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training.

Recent State Legislative Initiatives

The following are recent State of California legislative initiatives that show the direction the State is taking in proactively addressing increased wildfire risks. They serve as a guide for community planning throughout California.

- SB 85: Wildfire Package (Chaptered on April 13, 2021): Includes $536 million to fund projects to restore the ecological health of forests and watersheds, fuel breaks around vulnerable communities, statewide fire prevention grants targeting projects to advance community hardening, and improvements to defensible space to mitigate wildfire damage.
- AB 9: Creates Entity Dedicated to Wildfire Prevention Work and Regional Forest and Fire Capacity (Chaptered on September 23, 2021): Creates new branch in Office of the State Fire Marshal to focus exclusively on community fire prevention, preparedness, and mitigation efforts of CAL FIRE. Supports regional leadership to build local and regional

capacity and develop, prioritize, and implement strategies and projects that create fire adapted communities and landscapes by improving ecosystem health, community wildfire preparedness, and fire resilience.

- AB 642: Enhance Fire Prevention Efforts (Chaptered on September 28, 2021): Directs the Director of the Department of Forestry and Fire Prevention to designate moderate and high fire hazard severity zones. Makes changes to State law to enhance wildland fire prevention efforts, including, incorporating, and facilitating cultural burning practices. Also requires the Director of the Department of Forestry and Fire Protection to designate a cultural burning liaison.
- SB 63: Fire Prevention; Vegetation Management (Chaptered on September 28, 2021): Provides for fuel modification beyond the property line if necessary to maintain 100 feet of defensible space, as applicable; would also require State Fire Marshal and Department of Housing and Community Development to consider, if appropriate, expanding application of fire protection building standards (as specified for building in fire hazard severity zones) to expand application of these building standards to moderate fire hazard severity zones.
- AB 38 (Chaptered on October 2, 2019): California Wildfire Mitigation Financial Assistance Program: Established a comprehensive wildfire mitigation financial assistance program to encourage cost-effective structure hardening and retrofitting to create fire-resistant homes, businesses, and public buildings. The bill required the State Fire Marshal, in consultation with specified State officials, to identify building retrofits and structure hardening measures, and CAL FIRE to identify defensible space, vegetation management, and fuel modification activities, which are eligible for financial assistance under the program. The bill specifies the types of designated wildfire hazard areas eligible for funding under the program. AB 38 also required on or after January 1, 2021, the seller of any real property located in a high or very high fire hazard severity zone to provide a prescribed disclosure notice to the buyer, if the home was constructed before January 1, 2020, of information relating to fire hardening improvements on the property and a list of specified features that may make the home vulnerable to wildfire and flying embers and which features, if any, that exist on the home of which the seller is aware. By July 1, 2025, requires the disclosure notice to also include the State Fire Marshal's list of low-cost retrofits, and a specified final inspection report or information on where a copy may be obtained. Also requires on or after July 1, 2021, specified documentation to the buyer that the real property is in compliance with the wildfire protection measures or a local vegetation management ordinance, or enter into an agreement with the buyer pursuant to which the buyer will obtain documentation of compliance, as provided.
- AB 2911 (Chaptered on September 21, 2018): Fire Safety included various changes to fire safety planning efforts including:
    - Requires a local agency to transmit a copy of its adopted ordinance designating very high fire hazard severity (VHFHS) zones to the Board of Forestry and Fire Protection (Board);
    - Removes exemptions from requirement that a local agency designate, by ordinance, very high fire hazard severity zones in its jurisdiction within 120 days of receiving recommendations from the director of CAL FIRE;
    - Requires, before July 1, 2020, the Office of Planning and Research to update the guidance document entitled "Fire Hazard Planning General Plan Technical Advice Series" and update not less than once every eight years;

  - Authorizes the Board of Forestry, within 15 days of receipt of notification that its fire prevention recommendations will not be accepted by the local government, to request a consultation, prior to approval of the draft element or amendment, conducted in person, electronically, or by phone; and
  - Requires on or before July 1, 2021, and every five years thereafter, the Board, in consultation with the State Fire Marshal (SFM), to survey local governments to identify existing subdivisions (more than 30 dwelling units) in State Responsibility Areas (SRA) or Very High Fire Hazard Severity (VHFHS) zones without a secondary egress route that are at significant fire risk.
- SB 99: General Plans: Safety Element (Chaptered on August 30, 2019): Emergency Evacuation Routes requires the safety element of the general plan, upon the next revision of the housing element on or after January 1, 2020, to identify any residential developments in any hazard area that does not have at least two emergency evacuation routes.
- SB 1241: Land Use: General Plan Safety Element: Fire Hazard Impacts (Chaptered on September 13, 2012): Required cities and counties to address fire risk in the State Responsibility Areas (SRA) and Very High Fire Hazard Severity Zone (VHFHSZ) in the Safety Element of their general plans upon the next revision of the housing element and requires cities and counties to make certain findings regarding available fire protection and suppression services before approving a tentative map or parcel map. Requires review of Draft Safety Element by the Board of Forestry and CAL FIRE Land Use Planning Program staff, as well as to every local fire agency having jurisdiction.
- SB 1260: Fire Prevention and Protection (Chaptered on September 21, 2018): Promoted long-term forest health and wildfire resiliency. It made various changes related to local fire planning, prescribed fire requirements, and broader fire prevention efforts, including the following:
  - Requires a local agency to transmit a copy of its adopted ordinance designating VHFHS zones to the Board of Forestry and Fire Protection within 30 days of adoption;
  - Removed exemptions from the requirement that a local agency designate, by ordinance, VHFHS in its jurisdiction within 120 days of receiving recommendations from the director of CAL FIRE;
  - Authorizes the Board to recommend changes to a planning agency's safety element for methods and strategies accepted as best practices in the most recent guidance document entitled "Fire Hazard Planning, General Plan Technical Advice Series";
  - Requires a city or county that contains either SRA or VHFHS zones to notify the Board if it adopts or amends the safety element of its general plan; and
    Requires, upon approving a tentative map or a parcel map for an area located in either the SRA or VHFHS zone, the local agency to transmit a copy of the minimum fire safety standards findings required and accompanying maps to the Board.

<u>Best Practices for Analyzing and Mitigating Wildfire Impacts of Development Projects Under the California Environmental Quality Act</u>

The Office of the Attorney General's 2022 Best Practices for Analyzing and Mitigating Wildfire Impacts of Development Projects Under the California Environmental Quality Act is designed to help lead agencies comply with the California Environmental Quality Act, Public Resources

Code, section 21000 et seq. (CEQA), when considering whether to approve projects in wildfire-prone areas. This guidance provides suggestions for how best to comply with CEQA when analyzing and mitigating a proposed project's impacts on wildfire ignition risk, emergency access, and evacuation. This guidance is aimed at proposed development projects, such as residential, recreational, or commercial developments.

The Best Practices document does not impose additional requirements on local governments or alter any applicable laws or regulations. Rather, it is intended to provide guidance on some of the issues, alternatives, and mitigation measures that should be considered during the environmental review process. This guidance is based on the Office of the Attorney General's experience reviewing, commenting on, and litigating CEQA documents for projects in high wildfire prone areas, and is intended to assist lead agencies with their planning and approval of future projects.

Regional Regulations

San Mateo County Multi-Jurisdictional Local Hazard Mitigation Plan (2021)

The San Mateo County Department of Emergency Management is responsible for alerting and notifying appropriate agencies within the county's 20 cities when disaster strikes; coordinating all agencies that respond, ensuring resources are available and mobilized in times of disaster, developing plans and procedures in response to and recovery from disasters, and developing and providing preparedness materials for residents. In 2021, the San Mateo County Department of Emergency Management published a Multi-Jurisdictional Local Hazard Mitigation Plan, a large regional and cross-jurisdictional effort to plan for the reduction of risk from natural and other disasters.

The Local Hazard Mitigation Plan (LHMP) assesses hazard vulnerabilities and identifies mitigation actions that jurisdictions will pursue in order to reduce the level of injury, property damage, and community disruption that might otherwise result from such events. The LHMP addresses natural and human-caused hazards, including flooding, drought, wildfire, landslides, severe weather, terrorism, cyber threats, pandemic, and the impact of climate change on hazards, as well as other hazards.

Adoption of the Plan ensures the County and partner agencies remain eligible for various types of pre- and post-disaster community assistance, such as grants, from FEMA and the State government.

The Town of Hillsborough is a planning partner with San Mateo County and has assumed responsibility for adopting the recommendations of the plan and committing resources toward implementation of the action plan specific to Hillsborough.

San Mateo County Fire Protection Regulations

Chapter 3.84 of the San Mateo County Code, Fire Protection Regulations, adopts the California Fire Code by reference and sets forth fire protection regulation pertinent to local conditions. Section 3.84.100 requires fuel breaks around buildings of at least 30 feet, while considering the retention of existing landscaping and sensitive natural habitats. Section 3.84.120 requires compliance with the California Fire Code when constructing, relocating, or altering a building.

Other sections of the Chapter include revisions to the California Fire Code regarding emergency vehicle access; fire alarms, hydrants and sprinklers; construction and other issues.

Santa Cruz and San Mateo County Community Wildfire Protection Plan (2018)

The joint, Santa Cruz and San Mateo County Community Wildfire Protection Plan was updated in 2018. It is a tool for communities to identify landscape scale hazards and take strategic action to reduce wildfire risk for healthier ecosystems and more resilient communities. The plan assesses hazards and priorities within the two counties, identifies at-risk communities, and provides fuel reduction recommendations for high priority areas. The intent of the plan is to foster collaboration between communities for local action and to assist in planning, providing general guidelines to develop site-appropriate projects. The Community Wildfire Protection Plan can also aid communities in applying for state and federal funding for fire prevention projects and programs.

Local

City of Burlingame and Town of Hillsborough Emergency Operations Plan

The 2019 City of Burlingame and Town of Hillsborough Emergency Operations Plan outlines how these jurisdictions comply with and implement the requirements of the California Emergency Services Act, the U.S. Department of Homeland Security's (DHS) National Response Framework (NRF), and State of California Emergency Plan (SEP) to protect the lives, property and environment of the communities of Burlingame and Hillsborough. Burlingame and Hillsborough participate in a joint powers authority. The Central County Fire Department (CCFD) provides fire, emergency services, and emergency management to each jurisdiction. These jurisdictions also share a Joint Emergency Operation Center which has been approved and recognized by the Governor's Office of Emergency Services (Cal OES). The EOP includes planning assumptions, policies, and concepts of operations that guide the responsibilities for mitigation, planning, preparedness, response and recovery for Burlingame and Hillsborough.

Hillsborough General Plan

The Circulation Element, Open Space and Conservation Element, and Public Safety Element of the Town's General Plan contain goals, policies, and actions related to protection against wildfire and evacuation planning. Relevant goals, policies and actions include:

Policy C-1.5 – Maintain adequate emergency access for all land uses.

Goal OSC-2 - Preserve open space for existing and future residents.

Policy OSC-2.1 - Continue to maintain Town-owned open space in a manner that balances the need to protect natural habitat with controlling vegetation to reduce fuel loads, arrangements and potential wildfire hazards.

Policy OSC-2.2 - Consider the limited public use of Town-owned public open space, where appropriate, in a manner that considers mitigation of impacts on adjacent neighbors and natural resources and does not conflict with existing reversion restrictions or increase the risk of fire hazards.

Policy OSC-3.7 - Encourage the removal of non-native tree species, such as eucalyptus and acacia trees, that increase hazards for the community. Removed non-native trees should be replaced with native trees.

Policy OSC-3.10 - Continue to maintain fire trails in open space areas for public safety.

Goal PS-1 - Prevent and reduce risks to property and protect residents from urban and wildfire hazards.

Policy PS-1.1 - Maintain safe building practices and require fire-safe building materials in all new development and substantial redevelopments.

Policy PS-1.2 - Support fire prevention, public education, early detection programs and property inspections to identify and avoid fire hazards.

Policy PS-1.3 - Encourage the maintenance of ground cover and fire breaks on all open space lands.

Policy PS-1.4 - Support excellent fire service through the maintenance of fire equipment and the training of fire personnel.

Action PS-1.1 - The Central County Fire Department will review plans for all new buildings and major additions and make recommendations for modifications to reduce fire hazard.

Action PS-1.2 - When property owners are not correctly maintaining their property, the Town will implement fire control maintenance measures as needed on undeveloped private property, provide the necessary fire prevention improvements on properties that pose a significant public safety threat, and pass along incurred costs to property owners.

Action PS-1.3 - The Town will work with the Central County Fire Department to review and update, if necessary, the Town's and Department's regulations and approach regarding fire protection within Hillsborough to ensure adequate fire protection. Since the Town is mainly residential, the focus of this review will be on reducing the risk of fire to and resulting from individual residential properties. This review and update process will include the following:

- Review adopted and proposed federal and State regulations and ensure that Hillsborough complies as appropriate. This will include reviewing the proposed International Code Council Urban Interface Code and amendments to Government Code 51182 to identify necessary revisions to Town and Department policies and regulations.
- Determine whether the Town will benefit from increased fire protection from adopting the State identified Wildfire Hazard Areas pursuant to Government Code Section 51179. Based on this analysis, the Town will either adopt the State identified VHFSZs, adopt locally designated VHFSZs, or make a determination that the Town is exempt from adopting VHFSZs since adopted regulation has the same or more stringent controls as would be applied with the designation of a VHFSZ.
- Develop wildfire suppression contingency plans for periods when funding or fire fighting resources for wildfire suppression are reduced due to homeland safety events that may redirect federal and State funding away from local wildfire suppression activities.

Action PS-1.4 - The Town will continue to work with the Central County Fire Department to ensure that regional approaches to fire protection and suppression generated by the County, California Department of Forestry (CDF) and Fire Safe San Mateo County are implemented in Hillsborough.

Goal PS-6 - Ensure the Town's ability to respond effectively to natural and human-caused emergencies.

Policy PS-6.1 - Support the preparation, implementation and regular update of local preparedness and evacuation plans and multijurisdictional cooperation and communication for emergency situations.

Policy PS-6.2 - Continue to participate in regional emergency planning efforts.

Policy PS-6.3 - Educate residents regarding appropriate actions to safeguard life and property during and immediately after various types of emergencies.

Action PS-6.1 - The Town will develop a local emergency preparedness plan that identifies a City chain of command, outlines an action checklist and coordinates with the San Mateo County Emergency Operations Plan.

Action PS-6.2 - The Town will provide community awareness and education programs for citizens describing procedures and evacuation routes to be followed in the event of a disaster.

Action PS-6.3 - The Town will conduct periodic drills using emergency response systems to test the effectiveness of the Town's procedures.

Hillsborough Municipal Code

Municipal Code Chapter 15.20 is the Hillsborough Fire Code, which adopts by reference the 2022 California Fire Code and the International Fire Code, 2021 Edition, with amendments and modifications. Chapter 15.21 of the Municipal Code is the Hillsborough Wildland-Urban Interface Code, which adopts by reference the International Wildland-Urban Interface Code, 2018 Edition, with amendments and modifications. The Town's designated wildland area interface map has been made part of Chapter 15.21. The map is held on file in the office of the city clerk and includes: (1) all parcels identified as Very High Fire Hazard Severity Zones as recommended by the Director of California Department of Forestry and Fire Protection and as designated on a map titled Fire Hazard Severity Zones in LRA, Hillsborough, and (2) All parcels identified as High and Very High Fire Hazard Severity Zones consistent with California Department of Forestry and Fire Protection standards for determining Fire Hazard Severity Zones by the Town of Hillsborough's Community Assessment conducted in 2018. The Town's Wildland-Urban Interface Code contains provisions pertaining to driveways, special building construction regulations, and defensible space.

4.16.3 Thresholds of Significance

Potential impacts related to wildfire were determined in accordance with Appendix G of the CEQA Guidelines. Impacts would be considered potentially significant if the proposed Project will:

A. Substantially impair an adopted emergency response plan or emergency evacuation plan.

B. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

C. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.

D. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

E. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? *[Note: This threshold has been moved from Chapter 4.8, Hazards and Hazardous Materials, to this chapter.]*

4.16.4 Impacts and Mitigation Measures

The proposed Project consists of updates to the existing 2014 - 2022 Housing Element to reflect the 6th cycle 2023 – 2031 housing assignments; associated amendments to the Land Use Element and General Plan Land Use Map, Open Space and Conservation Element, and Public Safety Element; amendments to Title 17 (Zoning) of the Hillsborough Municipal Code, and amendments to the Hillsborough Zoning Map. These amendments are generally described in sections 3.3.9 through 3.3.12 in Project Description. The proposed amendments described in the Project Description would not result in environmental impacts related to wildfire and are therefore not discussed further in this chapter. The impact analysis focuses on the residential development that would be facilitated by the Draft 2023 – 2031 Housing Element.

Impact WILD-1 – Emergency Response and Emergency Evacuation Plan Impacts. *[Threshold of Significance (a)]*

According to the California Attorney General's Best Practices for Analyzing and Mitigating Wildfire Impacts of Development Projects Under the California Environmental Quality Act (October 2022), the addition of new development in high wildfire risk or adjacent areas may impact the evacuation of Project residents, as well as the existing population (e.g., residents, workers, students, visitors) in the area and the ability of emergency responders to simultaneously access the area to fight wildfire. This can, in turn, impact the risk and extent of large-scale fire spread and community safety within and around the new development.

The proposed Project, including the addition of new housing through the implementation of the Draft 2023 – 2031 Housing Element, does not require changes to the City of Burlingame/Town of Hillsborough Emergency Operations Plan (EOP). New housing that could be developed

through implementation of the Project would be located near evacuation routes as the CCFD has designated evacuation routes throughout the extent of the Town.

Construction of the development associated with the Project may temporarily impact traffic circulation conditions on local roads during construction periods. However, emergency access would be maintained on Town roadways during construction through the implementation of construction period traffic controls required by the Town's Construction Requirements (Town of Hillsborough 2023). The Town's Construction Requirements include strict enforcement of truck routes; require construction parking to be contained on site; and require traffic controls, flag crew, signage, and safety site controls at all times when work is being done in the right-of-way. These required traffic controls would ensure construction activities do not impede the flow of pedestrian, cyclist, or vehicular traffic in the vicinity of construction sites in the event of an emergency or evacuation event.

As discussed in Section 4.16.1, the Town contains many roads with only one point of ingress/egress and that are steep, narrow, and/or winding, particularly in the hills. In addition, some segments of the CCFD-designated evacuation routes are at risk of damage or blockage before, during, and following wildfires due to extensive tree cover over the roadway and narrow, winding roadways constructed on steep terrain. These existing conditions can potentially impair evacuation and emergency response efforts. Some of the Draft 2023 – 2031 Housing Element Housing Opportunity Sites are located in the hilly, western portion of the Town where evacuation routes are prone to these conditions.

Accessory Dwelling Units

ADUs can be constructed on any residentially zoned parcel in the Town and, as such, may be constructed in the WUI. ADUs may potentially be constructed on streets with only one point of ingress/egress; streets that are otherwise steep, narrow, or winding; or in neighborhoods that would funnel vehicle traffic to potential choke-point intersections during an evacuation, thereby adding housing stock to areas that may already be experiencing deficient evacuation conditions. The ADUs that may be constructed through implementation of the Project would be constructed over a period of eight years. The Draft 2023 – 2031 Housing Element anticipates the construction of, on average, 50 ADUs per year, for a total of 400 ADUs over eight years. The likely incremental construction of these ADUs over a period of eight years, as compared to the simultaneous approval and construction of many ADUs throughout the Planning Area, would prevent the addition of many new residents on existing streets in a short period of time. Further, the new ADUs anticipated in the Draft 2023 – 2031 Housing Element would not all be constructed in the same location, as these ADUs, and any resulting increases in traffic, are anticipated to be distributed throughout the Planning Area. Therefore, the addition of the small number of additional residents (mostly like one resident) generated by a new ADU on streets in the WUI would not likely exacerbate any existing evacuation deficiencies.

Vacant Housing Opportunity Sites

Vacant Housing Opportunity Sites (individual single-family residential lots) are dispersed throughout the WUI and may be constructed in neighborhoods with streets with only one point of ingress/egress; streets that are steep, narrow, or winding; and areas that would funnel vehicle traffic to potential choke-point intersections during an evacuation, thereby adding housing stock

to areas that may already be experiencing deficient evacuation conditions. The single-family homes that may be constructed on the Vacant Housing Opportunity Sites through implementation of the Project would be constructed over a period of eight years. The Draft 2023 – 2031 Housing Element anticipates the construction of 23 homes on the Vacant Housing Opportunity Sites over eight years. The likely incremental construction of these homes over a period of eight years would prevent the addition of many new residents on existing streets in a short period of time. Further, the Vacant Housing Opportuity Sites are distributed throughout the Town and would not all be constructed in the same location. Any resulting increases in traffic are anticipated to be distributed throughout the Planning Area. Therefore, the addition of the small number of additional residents generated by each Vacant Opportunity Housing Site, which would allow only for the development of single-family homes, lot splits, and ADUs, on streets in the WUI would not likely exacerbate any existing evacuation deficiencies.

Subdivision/Lot Split Opportunity Sites

The 50 Brooke Court and Hayne Road Subdivision Opportunity Sites would add up to three and five single-family homes, respectively, to the WUI. Residents of new homes built on the Hayne Roads Opportunity Site would evacuate via Hayne Road, Robinwood Lane, and Denise Road toward Black Mountain Road and I-280. Hayne Road, Robinwood Lane, and Denise Road traverse fairly steep terrain and Robinwood Lane and Denise Road have roadway segments that are winding and narrow. However, the addition of a small number of new homes in this location is not likely to exacerbate any existing evacuation deficiencies due to the small number of new residents that would be accommodated by five new single-family homes (i.e., approximately 11 people based on the 2.3 persons per household rate for Hillsborough from the Draft 2023 – 2031 Housing Element) and ingress/egress provided via Hayne Road, one of the Town's evacuation routes. Residents of new homes built on the 50 Brooke Court Opportunity Site would evacuate via Brooke Court toward Tournament Drive and, ultimately, Parrott Drive. The addition of three homes in this location is not likely to exacerbate any existing evacuation deficiencies.

The 2260 Redington Road Subdivision would add up to 35 homes to the Skyfarm neighborhood, and new residents would evacuate via Macadamia Drive and Skyfarm Drive or Eucalyptus Avenue via Redington Road, as the subdivision is currently conceptualized. While the 2260 Redington Road Subdivision could add a relatively larger number of homes compared to the other Subdivision/Lot Split Opportunity Site, the surrounding access roads, including the immediate evacuation routes are fairly wide (i.e., measuring at least 20 feet in width) and/or do not cross particularly steep or winding terrain along most segments of the roadways in the site vicinity. Therefore, while the 2260 Redington Road Opportunity Site would add residents associated with up to 35 new homes to the WUI, at least two points of ingress and egress would be provided to the site, which would ensure the development of this site would not likely create new or exacerbate existing, if any, evacuation deficiencies.

Multi-Family Opportunity Sites (except the Tobin Clark Site)

Development of the Nueva School and the Burlingame Country Club Opportunity Sites would not likely exacerbate or create new evacuation deficiencies because, while these sites are located in the WUI, they would construct a relatively small amount of housing in areas with flatter topography compared to most of the land within the WUI, which would ease the

evacuation of new residents. In addition, the Nueva School Opportunity Site is located directly off of Skyline Boulevard in the vicinity of I-280, and the site's proximity to these major evacuation routes would further facilitate the effective evacuation of the site and in addition to immediately adjacent properties. While the Town Hall Complex Opportunity Site would add more new housing and residents than the Nueva School Opportunity Site or Burlingame Country Club Opportunity Site, the Town Hall Complex is located immediately off El Camino Real, a major regional evacuation route, and evacuating residents would be able to easily access El Camino Real for evacuation.

General Plan Policies Relevant to Evacuation

The existing General Plan Public Safety Element contains the following goals, policies related to emergency response and evacuation planning:

Goal PS-6 - Ensure the Town's ability to respond effectively to natural and human-caused emergencies.

> *Policy PS-6.1* - Support the preparation, implementation and regular update of local preparedness and evacuation plans and multijurisdictional cooperation and communication for emergency situations.
>
> *Policy PS-6.2* - Continue to participate in regional emergency planning efforts.
>
> *Action PS-6.1* - The Town will develop a local emergency preparedness plan that identifies a City chain of command, outlines an action checklist and coordinates with the San Mateo County Emergency Operations Plan.
>
> *Action PS-6.2* - The Town will provide community awareness and education programs for citizens describing procedures and evacuation routes to be followed in the event of a disaster.
>
> *Action PS-6.3* - The Town will conduct periodic drills using emergency response systems to test the effectiveness of the Town's procedures.
>
> *Policy C-1.5* – Maintain adequate emergency access for all land uses.

As described in Section 4.16.1. Town uses ZoneHaven (recently renamed "genasys Protect") for evacuation needs. The public can use this platform to access real-time status updates and instructions for their evacuation zone on smartphone, computer, or tablet. The platform interfaces with real-time GPS-guided traffic maps so that residents can follow local emergency responders. The Town's implementation of genasys Protect during disaster events would help facilitate effective evacuation efforts that are responsive to real-time conditions. Additionally, residents can use SMC Alert and the Town's "Alert Center," which issues emergency alerts and other urgent information to residents, to be better prepared to evacuate quickly and in line with agency instructions during a disaster.

Further, individual future housing applications would be subject to CCFD review and would be required to comply with the Town Fire Code, the Town WUI Code, and CCFD standards, including access requirements.

Development included under the updated Housing Element would increase the population of the Town, which in turn may exacerbate traffic congestion during an evacuation by increasing the number of vehicles utilizing evacuation routes.

Recent State law requires jurisdictions to better address evacuation conditions and improve evacuation deficiencies. SB 99 (2019) requires jurisdictions to review and update the safety element to include information identifying residential developments in hazard areas that do not have at least two emergency evacuation routes. AB 747, which went into effect at the beginning of 2022, focuses on evacuation routes and requires local governments to identify evacuation route capacity, safety, and viability in the safety element or local hazard mitigation plan.

The Town of Hillsborough is not currently updating its General Plan Public Safety Element as part of this Focused GPU. As such, the Town has not yet completed Public Safety Element updates to respond to this recent State law. Further, while the existing General Plan goals, policies, and actions listed above, would help reduce evacuation-related impacts of the Focused GPU to a certain extent, the existing goals, policies, and actions do not specifically respond to or fulfill the requirements of SB 99 and AB 747. As such, mitigation is required to ensure Public Safety Element policies, which would guide potential development of housing facilitated by the Project, is responsive to current State law. Mitigation Measure WILD-1 is included below to ensure the Town is responsive to recent State law evacuation requirements and new development is designed to reduce evacuation impacts accordingly. With the implementation of Mitigation Measure WILD-1, the implementation of the Focused GPU, except for the development of the Tobin Clark site, would be ***less than significant with mitigation incorporated***.

Impact WILD-1: Development of the Housing Opportunity Sites could have potentially significant evacuation-related impacts, particularly considering the existing General Plan goals, policies, and actions to which the new housing development would be subject do not reflect recent State law requirements and the State Attorney General's Best Practices for Analyzing and Mitigating Wildfire Impacts of Development Projects.

Mitigation Measure WILD-1: Emergency Response and Emergency Evacuation Planning. The Town shall develop and adopt General Plan Public Safety Element goals, policies, and actions that address the following:

- Undertake an assessment that uses visual risk assessment and risk factors to identify and prioritize existing deficient evacuation routes. Improve evacuation routes based on the prioritization ranking and in areas identified as having deficient evacuation routes affected by new development, but also in consideration of improvements required for a transportation network which is resilient to wildfire.
- Undertake an assessment that uses visual risk assessment and risk factors to identify and prioritize substandard segments of roadways and choke point intersections. For each identified substandard roadway segments and choke point intersection identify potential physical improvements that would improve road and intersection conditions, which may include pullouts for passing on narrow roads, improved intersection angles, solar-powered streetlights at key intersections, and intersection controls at uncontrolled intersections.

- Implement the findings of both the evacuation routes assessment and substandard and choke point intersections assessment.
- Require new development to include adequate roadway ingress/egress for emergency access and evacuation routes. Any future housing development must have at least two points of ingress/egress.
- Identify and construct additional local evacuation routes in areas of high hazard concern or limited mobility.
- Collaborate with CCFD in the identification and mapping of areas with only one point of ingress or egress and roads that do not meet current emergency access and evacuation standards and the preparation of a program that prioritizes corrective actions.
- Commit funding for projects that enhance evacuation safety, spanning road improvement, signage, and notification systems. Ensure identified improvements can be funded in areas identified as having deficient evacuation routes as new development occurs.
- Track development of minimum standards for roads and evacuation routes and seek to adopt the standard. Apply any state standards for evacuation routes to new development.
- Update regularly and make available to the public maps depicting evacuation routes and areas prone to environmental hazards.
- Conduct a Townwide evacuation modeling and analysis study that involves:
    - Evaluation of the capacity of roadways to accommodate project and community evacuation and simultaneous emergency access.
    - Assessment of the timing for evacuation.
    - Identification of alternative plans for evacuation depending upon the location and dynamics of the emergency.
    - Evaluation of the project's impacts on existing evacuation plans.
    - Consideration of the adequacy of emergency access, including the project's proximity to existing fire services and the capacity of existing services.
    - Traffic modeling to quantify travel times under various likely scenarios.

In addition, require subdivision and multi-family housing developers to prepare project-specific evacuation and modeling analysis that includes the same evaluations as listed above.

- Develop a specific review application process for new subdivisions in the WUI for modeling impacts for evacuation.

<u>Tobin Clark Opportunity Site</u>

The Draft 2023 – 2031 Housing Element presents the Tobin Clark Opportunity Site as being able to support the development of up to 100 units of multi-family housing, potentially adding approximately 230 new people to the Town's population based on the average persons per household rate used in the Project transportation analysis (see Chapter 4.14). As it is currently conceptualized in the Draft 2023 – 2031 Housing Element, the Tobin Clark development would provide ingress and egress to the site through the College of San Mateo Parking Lot and Athletic Loop Road, both of which are located in the City of San Mateo and would require the City and College of San Mateo to allow for the new access points. There is also the potential for access to be provided through Hillsborough; however, a private property easement would be

required. With the development of up to 100 housing units, development of the Tobin Clark site could add substantial new traffic volumes to the existing roadways in the vicinity, including identified evacuation routes such as Tobin Clark Drive (if a private property easement is required), a roadway with a number of steep, winding segments, and Athletic Loop Road and Perimeter Road, which are City of San Mateo public streets that would already be expected to facilitate the evacuation of potentially thousands of students and staff from the College of San Mateo.

The addition of an estimated 230 new residents from the development of the Tobin Clark site could significantly exacerbate evacuation deficiencies, if any, along roadways in the vicinity if the new residents are evacuating along standards roads and if the new traffic volumes would exceed the capacity of surrounding roadways, which are already anticipated to facilitate the evacuation of the many students and staff associated with the College of San Mateo. Further, if there are substandard roads in the vicinity that would be use for site evacuation, the potential to widen these roads is low as Tobin Clark Drive is located on a steep hillside, and the College of San Mateo parking lot and Athletic Loop Road are not under the Town of Hillsborough's jurisdiction. For similar reasons, the ability of the Town to improve key intersections to improve potential choke points along the evacuation routes that would serve the Tobin Clark site is limited.

Because it is currently unknown exactly which routes new residents of the Tobin Clark site would take to evacuate the area as discussed above, and there is the potential for the Tobin Clark development to add a substantial number of new people to an area with potentially substandard roads, it is not possible to fully mitigate the potential impacts of the anticipated evacuation volumes from the Tobin Clark site. Mitigation Measure WILD-1 may help reduce impacts to a certain extent, but there are currently too many unknowns related to site access, existing evacuation conditions, and the potential for the Tobin Clark development to exacerbate any existing deficiencies to reach a conclusion as to whether the implementation of Mitigation Measure WILD-1 would fully mitigate potential evacuation impacts. As such, the potential evacuation-related impacts of development of the Tobin Clark Opportunity Site as it is currently conceptualized is ***significant and unavoidable***.

Impact WILD-2 – Exacerbate Wildfire Risks, and Thereby Increase Wildfire-Related Pollutant Concentration Exposure Impacts. *[Threshold of Significance (b)]*

The risks associated with wildfires are most pronounced for the hillside neighborhoods in the central and western portions of the Town, particularly in the Town's designated WUI areas. Many of the Draft 2023 – 2031 Housing Element Housing Opportunity Sites would be located in the WUI. All Subdivision/Lot Split Opportunity Sites would be located in the WUI. All Multi-Family Opportunity Sites except the Town Hall Complex Opportunity Site would be located in the WUI. 18 of the 23 Vacant Housing Opportunity Sites would be located in the WUI. Lastly, because ADUs are permitted on any single-family residential lot and 70 percent of the land within the Town is located in the WUI, many new ADUs may potentially be constructed in the WUI. It should be noted that new housing located adjacent but not within the WUI is also subject to high fire risk as wildfires that begin in the WUI may spread over into non-WUI areas.

While many of the Housing Opportunity Sites are in the WUI, the construction and occupation of these new housing units is not anticipated to exacerbate wildfire risks thereby exposing new

occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire because all housing units would be developed consistent with Town General Plan policies addressing wildfire safety (see General Plan goals and policies presented above in Section 4.16.2), the 2022 California Fire Code, and CCFD's recently-established Hillsborough WUI Program.

The Town has adopted the 2022 California Fire Code (CFC) and 2018 International Wildland-Urban Interface Code respectively as Chapters 15.20 and 15.21 of its Municipal Code as described above in Section 4.16.2 Regulatory Setting. The Draft 2023 – 2031 Housing Element Housing Opportunity Sites that would be constructed outside the designated WUI, including the Town Hall Complex Opportunity Sites, five of the Vacant Housing Opportunity Sites, and ADUs, would be subject to the development standards and requirements contained within the Hillsborough Fire Code, including road standards for fire equipment access (CFC Section 503) with local amendments made for fire lane designation requirements; standards for signs identifying streets, roads, and buildings (CFC Section 505) with local amendments pertaining to the size of address numbers, addressing for multi-tenant buildings, rear property addressing, and ADU addressing; standards for minimum required private water supply reserves for emergency fire use (CFC Section 507) with local amendments related to private fire hydrants; standards for sprinklered buildings, including ADUs, (CFC Section 903) with local amendments; standards for vegetation management (CFC Section 4906) with local amendments; standards for defensible space (CFC Section 4907) with local amendments; and more.

The ongoing operation of the CCFD's recently-established Hillsborough WUI Program would serve to greatly reduce the risks associated with potential improper vegetation management on the Housing Opportunity Sites following site development. The WUI Program would encompass all Housing Opportunity Sites located within the designated WUI, as noted above. Vegetation management plans and inspections of the Housing Opportunity Sites in the WUI would ensure defensible space is created and maintained on the Housing Opportunity Sites following development, thereby reducing the risk of the ignition or spread of wildfire associated with the Housing Opportunity Sites in the WUI. The WUI Program's defensible space requirements are presented in the Regulatory Setting discussion (Section 4.16.2, above).

The Draft 2023 – 2031 Housing Element Housing Action Plan includes new goals, policies, and actions that address wildfire hazards in relation to the new housing development that may be facilitated by the Project. Relevant Housing Action Plan goals, policies, and actions that would help prevent against the ignition and spread of wildfire associated with development of housing facilitated by the Project include:

Policy 4 - Ensure Responsible Development in Wildland Urban Interface (WUI) Areas

Goal 4.1 - Continue to support the Central County Fire District (CCFD) WUI Home Inspection Program.

Action 4.1 (a) - Enhance communications to residents regarding their required participation in the WUI Inspection Program.

Action 4.1 (b) - Require all new proposed landscape plans on properties in designated WUI area to submit a vegetation management plan and receive approval by CCFD.

Goal 4.2 - Continue to support community participation in the National Firewise USA® Recognition Program of the National Fire Protection Association (NFPA).

Action 4.2 (a) - Maintain the Town's "Firewise Hillsborough" webpage to provide residents with valuable information about how to stay wildfire ready.

Action 4.2 (b) - Provide a link on the Town's Firewise Hillsborough webpage to access information on which residential property insurance companies may be currently offering discounts for fire hardened homes.

Action 4.2 (c) - Maintain the Town's status as a Firewise USA Community, as recognized by the National Fire Protection Association (NFPA).

Goal 4.3 - Establish and enforce safety standards for structures and landscaping in WUI areas.

Action 4.3 (a) - The Central County Fire Department will review proposed plans for all new buildings and major additions to ensure the construction complies with fire access requirements and make recommendations for modifications to reduce fire hazards.

Current regulations, along with the proposed Draft 2023 – 2031 Housing Element goals, policies, and actions, will continue to reduce the potential wildfire risks associated with new residential development. These provisions will continue to regulate, for example, building design, building and site access, firefighting water supply, and vegetation management, all to lessen the possible risk of ignition and spread of wildfires.

New housing in the WUI would not be likely to exacerbate wildfire risks because of the extensive requirements in place for fire safe building materials, defensible space, and storage of water for firefighting. Human-caused fires have been negatively correlated with population density, meaning more developed areas are less likely to be affected by wildfires throughout the State and suggesting that additional development would not necessarily lead to more wildfire risk, especially where high-density housing is developed.

Compliance with the existing General Plan policies and actions, Housing Action Plan policies, goals, and actions, State regulatory requirements described above and in Section 4.16.2, and the applicable CCFD development review process for new development in the Town, the WUI Program inspections and requirements, would help minimize the potential for impacts related to wildfires and subsequent downhill or downstream impacts, including exposure to air pollutants. Therefore, the Project would not result in substantial adverse impacts due to slope, prevailing winds, and other factors, exacerbating wildfire risks, and thereby exposing Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. This impact would be ***less than significant***.

Impact WILD-3 – Impacts from Necessary Infrastructure Improvements. *[Threshold of Significance (c)]*

Development of the Draft 2023 – 2031 Housing Opportunity Sites would involve the placement of new development within previously undeveloped areas and require the installation of or maintenance of infrastructure such as roads, emergency vehicle turn arounds, fuel breaks, emergency water sources, powerlines, or other utilities.

Subdivision/Lot Opportunity Sites

While existing infrastructure is located in the vicinity of the 2260 Redington Road Subdivision Site, the conceptual plan for the Strawberry Hill subdivision includes a new internal site roadway that would connect to Macadamia Drive and Redington Road and build-out of the subdivision would likely involve new utility mains throughout the site to serve up to 35 new homes, potential fuel breaks between new homes and the existing vegetation that would be left in place, and potential new emergency water supplies to serve the development.

Development of the Hayne Road and 50 Brooke Court Subdivision Sites would not involve the development of internal access roads that travel through the entire site, but new driveways would be required to provide access from existing roads to the new single-family residences. New utility mains would not likely be required for these subdivision sites as existing utility mains are located in the adjacent roadways, but the installation of new on-site private utility lines and utility tie-ins would be required. Fuel breaks may be required for most if not all housing developed in the Hayne Road and 50 Brooke Court Subdivisions considering the sections of the currently heavily vegetated parcels may be left in place following home construction. Lastly, new emergency water sources would not likely be required as water mains currently exist in these areas, though new private fire hydrant(s) may be necessary.

Multi-Family Opportunity Sites

Development of the Nueva School, Burlingame Country Club, and Town Hall Complex Opportunity Sites would not require the installation of extensive new infrastructure as these developments would be located on sites that are already developed and already served by existing access roads and utility mains.

Development of the Tobin Clark Opportunity Site, however, would require the installation of extensive new infrastructure, including a new internal access road throughout the site, potentially new utility mains along with the new access road, fuel break(s), and emergency water supplies considering the site is vacant, undeveloped and would not likely be able to tie into any existing utility mains as the new housing as it is currently conceptualized would not be located near existing buildings or facilities.

Vacant Housing Opportunity Sites

The development of the Vacant Housing Opportunity Sites may require the extension of utility infrastructure onto vacant housing sites, but because the Vacant Opportunity Sites are single lots in built-out neighborhoods intended for single-family residences, the construction of roads, fuel breaks, emergency water supplies (though new fire hydrants may be required), and new utility mains would not likely be required.

Accessory Dwelling Units

The development of new ADUs would not likely involve extensive, if any, infrastructure improvements because existing infrastructure was most likely constructed previously to serve the single-family residence on the lots within which the ADUs would be located.

Chapter 33 of the 2022 CFC addresses fire safety during construction and demolition, mandating fire safety procedures for the construction and demolition of structures (Section 3301-3317) and Chapter 49 of the 2022 CFC addresses requirements for construction within wildland-urban interface fire areas and establishes minimum standards related to defensible space, requiring that property owners in a VHFHSZ manage vegetation within a 100-foot radius of a building. Future development in Hillsborough would also be subject to the existing General Plan goals, policies, and actions and new Draft 2023 – 2031 Housing Element goals and actions that address potential wildfire impacts Townwide. The compliance of new housing development that may be facilitated by the Project with Chapters 33 and 49 of the 2022 CFC, which is required of all new housing development that takes place in the Town, and General Plan and Draft 2023 – 2031 Housing Element goals, policies, and actions would ensure construction-period installation of new roads, fuel breaks, emergency water sources, power lines or other utilities associated with the potential development of the Housing Opportunity Sites would not exacerbate fire risk or temporary or ongoing impacts to the environment.

This impact would be ***less than significant***.

Impact WILD-4 –Potential Post-Fire Slope Instability or Drainage Impacts. *[Threshold of Significance (d)]*

Erosion, landslides, and debris flows are often associated with areas that have been burned by wildfires. Landslide susceptibility in Hillsborough is shown in Figure 4.6-2 in Chapter 4.6 Geology and Soils. Wildfires that burn all vegetation and plant roots can result in slopes and soils that are susceptible to soil movement and loss. Exposure to rain and increased runoff can exacerbate potential post-fire sloe instability.

As noted previously, many of the Draft 2023 – 2031 Housing Element Housing Opportunity Sites would be located in the Town's hillside neighborhoods where there is elevated risk of wildfire and potential slope instability. Chapter 4.6 (Geology and Soils) of this EIR provides further detail on landslide and slope stability hazards in the Planning Areas. The following existing General Plan goals, policies, and actions address landslide potential and slope failure following natural disasters:

Goal PS-2 - Reduce risk of landslide and slope failure during and after heavy rains and earthquakes, and protect the community from hazards associated with soil erosion, weak and expansive soils and slope instability.

> *Policy PS-2.1* - Minimize development in areas of natural hazards, such as landslides and floodplains, which have the potential to jeopardize the public health and safety.
>
> *Policy PS-2.2* - Reduce the risk of impacts from geologic and seismic hazards by applying proper development engineering, building construction and retrofitting requirements.
>
> *Policy PS-2.3* - Review new building plans for proper foundation and supports in areas with slope gradients greater than 10 percent. Require property owners to provide minimal slope stabilization in properties high at risk to earthquake-induced slope failure.
>
> *Policy PS-2.4* - Properties in hazardous slope areas where slope improvements have been made should be inspected periodically.

Policy PS-2.5 - Review drainage plans for new development to determine areas susceptible to poor drainage and compare with areas susceptible to slope failure.

Action PS-2.1 - The Town will continue to implement its Hillside Lot Size Ordinance that limits the density of development on slopes over 10 percent to reduce the risk of slope failure and to reduce runoff and erosion. Implementation of the Ordinance also helps to protect open space features and riparian habitat by minimizing development along streambeds.

Action PS-2.2 - The Town will continue to require construction plans for all new houses be reviewed by a State of California-registered professional engineer (PE).

The General Plan goals, policies, and actions listed above and discussed in Chapter 4.6 (Geology and Soils) and Chapter 4.9 (Hydrology and Water Quality) of this EIR require existing and new development to be adequately protected from potential flooding, slope stability, or landslide hazards and avoid or reduce the potential for these hazards to occur through careful site planning and construction. Further, the existing General Plan Public Safety Element and Draft 2023 – 2031 Housing Element Housing Action Plan include policies, goals, and actions and the CCFD's WUI Program conducts regular vegetation management inspections of properties in Hillsborough that would reduce the risk of the ignition and spread of wildfire in the Town, thereby reducing the potential for post-fire impacts. Further, Mitigation Measure GEO-1 of this EIR requires the Town to adequately study and address the potential sloe instability impacts of development that may be facilitated by the Project, including amending the Municipal Code to include stability report requirements in Title 16 Subdivisions. Chapter 4.6 (Geology and Soils) of this EIR provides further detail. Further, the Town requires through its Municipal Code geotechnical requirements, including the preparation of geotechnical reports, for development to address the geologic safety of development in areas prone to landslides. Compliance with and implementation of existing General Plan policies and actions, proposed Housing Action Plan policies and actions, the CCFD's WUI Program, and Municipal Code requirements would ensure the Project does not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. This impact would be ***less than significant***.

Impact WILD-5 – Risk to People and Structures from Exposure to Wildfire. *[Threshold of Significance (e)]*

All new residential development facilitated by the Project would be required to comply with fire safety standards. Compliance with existing General Plan policies and actions and Housing Action Plan policies and actions would reduce risks associated with the ignition and spread of wildfire. The proposed policies and actions include wildfire risk reduction measures that range from, for example, community wildfire education efforts, fuel reduction requirements and guidance, ensuring the continued provision of adequate fire response services, ensuring adequate emergency access for land uses and new development, requiring fire-resistant building design, collaborating with regional fire protection and emergency management service providers, and increasing overall levels of community preparedness. The applicable General

Plan policies and actions that would reduce potential risk to people and structures from exposure to wildfire are listed in Section 4.16.2.

While the Project would introduce new development that could potentially be impacted directly or indirectly by wildfire, existing General Plan policies and actions, the Draft 2023 – 2031 Housing Element goals, policies, and actions, the Town's Fire Code, and WUI Code, and the CCFD Hillsborough WUI Program would help reduce the potential for wildfire ignition and spread and reduce risks to people and structures from wildfire. As discussed under Impacts WILD-1, WILD-2, and WILD-4, Mitigation Measure WILD-1 would improve evacuation and emergency response, existing regulations and programs would reduce the potential for wildfire ignitions and uncontrolled spread of wildfire, and Mitigation Measure GEO-1 and existing policies and regulations would reduce the potential for post-fire impacts (e.g., post-fire debris flow) to harm people or damage structures. Therefore, the Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildfires. This impact would be ***less than significant***.

4.16.5 References

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CHAPTER 5 ALTERNATIVES

Section 15126.6 of the CEQA Guidelines requires an EIR to *"describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." The section also states that "the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if those alternatives would impede to some degree the attainment of the project objectives, or would be more costly."* Under Section 15126.6(a) of the CEQA Guidelines, an EIR does not need to consider alternatives that are not feasible, nor need it address every conceivable alternative to the project. The range of alternatives "is governed by the 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice" (CEQA Guidelines § 15126.6(f).)

Section 15126.6(b) states that "the discussion of alternatives shall focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project, even if those alternatives would impede to some degree the attainment of the basic project objectives or would be more costly."

Pursuant to Section 15126.6, this chapter describes two alternatives to the Focused GPU (Project), including (1) the CEQA-mandated No Project Alternative, and (2) the Reduced VMT and compares the impacts of each alternative to the Project.

This chapter analyzes the ability of the proposed alternatives to avoid or substantially reduce significant unavoidable impacts and lessen other significant impacts of the proposed project. The ability of each alternative to meet the basic Project objectives is also described, and the "environmentally superior" alternative among the two (2) alternatives is identified, as required by the CEQA Guidelines.

5.1 Impacts of the Proposed Project

CEQA requires the alternatives discussion to describe alternatives to the Project that would avoid or substantially lessen any of the significant effects of the Project. This EIR has identified the following significant unavoidable impacts that could result from the Project (also see Table 2-1 in the Summary chapter).

5.1.1 Significant Unavoidable Project Impacts

This EIR has identified the following significant unavoidable impacts that could result from the proposed Project:

Impact AES-1: Because the multi-family housing Objective Design Standards are not yet developed and adopted, it cannot be guaranteed that the Objective Design Standards would minimize the effects of development of the Tobin Clark site on the visual character or quality of the area sufficiently to reduce potential effects to less than significant. Therefore, the aesthetics

impact of the potential development of the Tobin Clark site, even with Mitigation Measure AES-1, would be significant and unavoidable. **(*Significant and Unavoidable Impact*)**

Impact AIR-1 –The proposed Project would be inconsistent with one of the control measures identified in the 2017 Clean Air Plan related to VMT from land use planning. Although the growth in trips and VMT attributable to the Project would be less than the increase in population growth, the Project could still obstruct implementation of the 2017 Clean Air Plan due to control measure inconsistency. Due to this, the Project has the potential to generate a cumulatively considerable net increase in criteria air pollutant emissions for which the region is non-attainment, including ozone precursors, PM2.5, and PM10, pursuant to BAAQMD plan-level assessment criteria. Mitigation Measure AIR-1 would help to reduce VMT generated by the additional residential units proposed by Draft 2023 – 2031 Housing Element; however, it would not be enough to reduce this impact to less than significant, as the 2017 Clean Air Plan control measure the Project is inconsistent with is directly related to land use planning. This impact would be significant and unavoidable despite the implementation of mitigation. **(*Significant and Unavoidable Impact*)**

Cumulative Air Quality Impact – The SFBAAB is designated nonattainment for national and State O3 standards, national and State PM2.5 standards, and national PM10 standards. The analysis of potential air quality impacts described above indicates the Project would conflict with the 2017 Clean Air Plan and result in a significant and unavoidable impact to regional air quality (from O3 precursor emissions, PM2.5, and PM10). Impact AIR-1's analysis is cumulative in nature. Therefore, this impact would also be cumulatively significant and unavoidable. The Project would implement Mitigation Measure AIR-1 to reduce VMT; however, the nexus of the impact is related to land use density and location. This impact would remain significant and unavoidable despite the implementation of Mitigation Measure AIR-1. **(*Significant and Unavoidable Impact*)**

Impact CUL-1: Future development projects that may be facilitated by the Focused GPU may cause substantial adverse changes in the significance of a historic resource, including properties or features eligible for listing in a local, State, or federal register of historic resources. This is considered a potentially significant impact. Implementation of Mitigation Measures CUL-1 would generally reduce impacts to a less than significant level. However, without knowing the characteristics of the potentially affected historic resource or of the future development proposal, it cannot be guaranteed with certainty that the measures within CUL-1 would fully mitigate impacts to a potentially historic resource. Therefore, the Focused GPU's potential impacts to historic resources would remain significant and unavoidable. **(*Significant and Unavoidable Impact*)**

Impact GHG-1 –Implementation of the proposed Focused GPU could result in construction and operational activities that generate GHG emissions. The GHG emissions that could be generated by the increase in housing facilitated by the Project would not be consistent with BAAMD-recommended CEQA thresholds of significance and the CARB Scoping Plan. Mitigation Measures GHG-1a through GHG-1e are intended to reduce GHG emissions from transportation and building energy use, which are two of the largest sources of potential GHG emissions associated with the additional land uses contained in the proposed Project. While it is anticipated that the Town would be able to identify a new / revised strategy for addressing the GHG emissions associated with residential growth facilitated by the Project (see Mitigation

Measure GHG-1A) and align the Town's emissions with state-wide and local targets for 2030 and 2045, it cannot be definitively known or stated at this time that such policy considerations would be able to achieve the intended targets. Additional consideration would likely need to be given to expand carbon sequestration efforts as a means to offset increases in GHG emissions associated with the growth proposed by the Project. Since the GHG emissions associated with the implementation of the Draft 2023 – 2031 Housing Element would not meet State GHG reduction goals and could conflict with plans adopted for the purposes of reducing GHG emissions (e.g., 2022 Scoping Plan), and since the GHG reductions attributable to Mitigation Measures GHG-1a to GHG-1e cannot be definitively assessed at this time, this impact would be significant and unavoidable. **(*Significant and Unavoidable Impact*)**

Cumulative GHG Impact: The proposed 2023 – 2031 Housing Element would result in GHG emissions that do not meet the State's 2030 GHG reduction or 2045 carbon neutrality goals. The implementation of the Draft 2023 – 2031Housing Element could also result in GHG emissions that conflict with plans adopted for the purposes of reducing GHG emission, including the 2022 Scoping Plan and Plan Bay Area 2050. Even with mitigation, this cumulative impact would be significant and unavoidable. **(*Significant and Unavoidable Impact*)**

Impact HYD-1: Development of the Draft 2023-2031 Housing Element Housing Opportunity Sites could have potentially significant flooding-related impacts, particularly considering the existing General Plan goals, policies, and actions to which the new housing development would be subject do not reflect recent State law requirements. Because it cannot be guaranteed at this time that the forthcoming goals, policies, and/or actions to implement HYD-1 would reduce the effects of future residential development facilitated by the Project related to flooding and pollutant release sufficiently to reduce potential effects to less than significant, this impact would be *significant and unavoidable*. **(*Significant and Unavoidable Impact*)**

Impact TRANS-2 –The Project would make a cumulatively considerable contribution to a significant cumulative impact with respect to "impacts related to vehicle miles traveled." The Project would result in an increase in vehicle miles traveled above the San Mateo countywide VMT per capita and with implementation of mitigations measure would not be able to reduce the VMT impacts associated with future development projects below the threshold. In addition, the Cumulative and Cumulative plus Project VMT (summarized in EIR Table 4.14-3) would remain well above the countywide significance threshold. Thus, the Housing Element Update would have a significant cumulative impact on VMT. **(*Significant and Unavoidable Impact*)**

Impact WILD-1: Development of Housing Opportunity Sites could have potentially significant evacuation-related impacts, particularly considering that the existing General Plan goals, policies, and actions to which the new housing development would be subject do not reflect recent State law requirements and the State Attorney General's Best Practices for Analyzing and Mitigating Wildfire Impacts of Development Projects. Although Mitigation Measure WILD-1 would reduce the potentially significant evacuation-related impacts for most of the Housing Opportunity Sites to less than significant, this would not apply to the Tobin Clark site. Because it is currently unknown exactly which routes new residents would take to evacuate the Tobin Clark development, there is the potential that the addition approximately 100 units and a substantial number of new people to the area would not be accommodated by potentially substandard roads. Without project-specific details pertaining to site access, existing evacuation conditions and deficiencies, the potential exists implementation of Mitigation Measure WILD-1 would not be

sufficient to fully mitigate potential evacuation impacts for the Tobin Clark site. Therefore, potential evacuation-related impacts of development of the Tobin Clark Opportunity Site is conservatively considered significant and unavoidable. (***Significant and Unavoidable Impact***)

5.1.2 Less Than Significant Project Impacts – with Mitigation:

Impact AIR-2: The Project could result in substantial pollutant concentrations that result in community health risks and hazards. Mitigation Measure AIR-2a, Implement BAAQMD Basic Construction Mitigation Measures, and Mitigation Measure AIR-2b, Prepare Project-level Construction Emissions Assessment, would reduce the potentially significant air quality impacts to less than significant.

Impact BIO-1: Mitigation Measure BIO-1, Project-Specific Biological Resources Evaluation, would prevent significant impacts to special-status species from new housing on sites containing or adjacent to natural habitat. Mitigation Measure BIO-2, Nesting Birds, would prevent significant impacts to nesting birds during construction of new housing. Mitigation Measures BIO-3a, Bat Habitat Assessment, and BIO-3b, Dusk Emergence Bat Survey, would prevent significant impacts to roosting bat habitat in areas with natural vegetation or aquatic habitat. Mitigation Measure BIP-4 would require adoption of an Ordinance protecting wetland and riparian habitat. Implementation of Mitigation Measures BIO-1 through BIO-4 would reduce potential impacts to any species listed as candidate, sensitive or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Game or U. S. Fish and Wildlife to a less than significant level.

Impact CUL-1: Construction activities, particularly excavation for building foundations, trenching for utilities, and development of roadways, associated with residential development projects that may be facilitated by the Project may disturb previously unknown human remains during construction. Mitigation Measure CUL-1 would reduce impacts on previously unknown human remains to less than significant.

Impact TRIB-1: Development facilitated by the Project could disturb unrecorded sensitive archaeological resources or tribal cultural resources in the Planning Area, resulting in adverse changes in the significance of a tribal cultural resource. Mitigation Measure CUL-1 would reduce any potential impacts to TCRs to less than significant.

Impact ENG-1: Implementation of the Project would increase the demand for electricity and natural gas within the Town and gasoline and diesel consumption in the region during construction and operation of new land use developments, which could result in the use of energy in a wasteful, inefficient, or unnecessary manner during project construction or operation. Mitigation Measures ENG-1a, Residential Electric Vehicle Charging Requirements, and ENG-1b, Residential Development Project VMT Reductions, would reduce this impact to less than significant.

Impact GEO-1: The Project could facilitate more intensive housing development than currently permitted on hillside lots in the Planning Area. More intensive hillside development, if not properly studied for potential ground instability impacts, including those influenced by climate change impacts, could adversely affect future subdivision residents, surrounding residents, and the environment by causing or contributing to landslides, debris flows, and other forms of

ground instability. Mitigation Measure GEO-1 would reduce this impact to less than significant. Mitigation Measure GEO-2 would reduce impacts to unknown paleontological resources.

Impact HAZ-1: New residential construction facilitated by the Project could result in the exposure of construction workers, visitors, and/or other passers-by to hazardous contamination or existing spilled, leaked, or otherwise discharged hazardous materials or wastes. Implementation of Mitigation Measure HAZ-1 would ensure protection of the public and the environment from reasonably foreseeable upset and accident conditions associated with hazardous materials.

Impact UTS-1: Construction of utility service pipelines (water, wastewater, storm drain) could impact sensitive biological resources. Mitigation Measure UTS-1, Mitigation Measure UTS-2, and Mitigation Measure UTS-3 would require implementation of mitigation measures identified in Chapter 4.3 Biological Resources related to impacts to special status species, nesting birds, roosting bats; impacts on riparian habitat and other sensitive natural communities; impacts on state or federally protected wetlands; impacts on wildlife movement corridors and wildlife nursery sites; and impacts related to the removal of protected trees, including oaks, and oak woodland, would reduce this impact to less than significant.

5.2 Rationale for Alternative Selection

In accordance with CEQA Guidelines Section 15126.6(a), an EIR does not need to evaluate every conceivable alternative. Section 15126.6(c) of the CEQA Guidelines states, “Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic Project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental effects.” CEQA Guidelines Section 15126.6(f)(2) also indicates that alternatives whose implementation would be remote or speculative, or the effects of which cannot be reasonably predicted, need not be considered.

CEQA Guidelines Section 15126.6(f) indicates that the Lead Agency should consider site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and the proponent’s control over alternative sites in determining the range of alternatives to be evaluated in an EIR.

The Housing Element site selection process involved extensive research into viable housing sites, and multiple public workshops and presentations to the City Council. See Chapter 2 Public Participation, Chapter 8 Housing Opportunities in the 2023 – 2031 Draft Housing Element. The Housing Element ultimately identifies housing opportunity sites with demonstrated viability for future housing development and which minimize environmental impacts and also minimize exposure to environmental hazards. This effort is reflected in the number and type of significant and unavoidable impacts identified above in Section 5.1. Most of the significant and unavoidable impacts are related to air emissions associated with housing construction and vehicle miles travelled (VMT), though there is a significant and unavoidable impact related to wildfire.

Because most of the housing sites identified in the Housing Element are based on development of ADUs, which means most parcels in the Town would be eligible to pursue an ADU, the housing facilitated by the Project could be to the west, away from El Camino Real, and thus not

close to available transit. In addition, because the Town is primarily residential and has no commercial development, there is no traditional “downtown” that could provide the types of employment center benefits that reduce VMT via transportation demand management. Therefore, the EIR impact analysis determined the Project would have significant VMT impacts, air emissions from vehicle traffic, and GHG emissions, based on the identified Thresholds of Significance presented in the EIR. Section 15126.6 of the CEQA Guidelines requires an EIR to describe a range of reasonable alternatives to the Project that would avoid or substantially lessen any of the significant effects of the Project. However, because ADU development is allowed by State law, the EIR does not present alternatives that propose different housing sites—i.e., the Town has no control over which property owner would elect to develop an ADU, although development requiring discretionary review by the Town (subdivisions/lot splits and multi-family housing) could modified so that density is shifted closer to available transit options (e.g., El Camino Real) and VMT reduced.

The EIR is required to describe a range of reasonable alternatives to the Project which would feasibly attain most of the basic objectives of the Project and would avoid or substantially lessen significant effects of the Project. The Project objectives included in Chapter 3, Project Description, are:

Project Objectives:

1. Promote the preservation and improvement of existing housing and neighborhoods, and promote new housing growth to provide more affordable and market rate housing that meets the Town’s Cycle 6 Regional Housing Needs Allocation (RHNA).

2. Meet housing needs by encouraging a variety of housing development affordable at all income levels, including construction of Accessory Dwelling Units (ADUs), multi-family housing on Town-owned land, subdivision/lot split opportunity sites, and other housing choices on vacant opportunity sites, private recreational sites, and institutionally owned sites.

3. Reduce, remove, and/or mitigate potential governmental constraints and barriers to housing development and promote equal housing opportunities for all people; incorporate best practices related to land use, racial equity, mobility, housing affordability, safety, environmental justice, community services, and healthy neighborhoods.

4. Affirmatively further fair housing, and take meaningful actions to overcome patterns of segregation, promote fair housing choice, eliminate disparities in opportunities, and foster inclusive communities free from discrimination.

5. Provide adequate housing for all segments of the population, within the Town’s constraints; promote and assist in the development of housing that meets the needs of special needs communities in Hillsborough while protecting the character of the Town.

6. Engage residents and stakeholders to generate ideas for potential Town-specific approaches to meet the Town’s Cycle 6 RHNA, gain insight on the greatest challenges and opportunities that face Hillsborough, and ensure equitable and inclusive processes, policies, investments, and service systems.

7. Expand and update technology and innovative practices to create smart, sustainable communities, and adaptable infrastructure systems.

8. Protect lives and property from risks associated with wildfire-related emergencies; reduce the potential loss of life, injury, and property damage due to flooding, and seismic and geologic hazards.

While selecting alternatives to be considered for analysis, the Town focused on alternatives which could potentially reduce the significant effects of the Project and would also achieve Project objectives. One overarching objective of the Project is to accommodate, within the framework of the Housing Element, the State-mandated RHNA goal for the Town for the 6th Housing Cycle, which is a total of 554 dwelling units. Therefore, the extent to which the RHNA would be achieved (referred to as the "RHNA Objective") was analyzed for each alternative.

5.3 Alternatives Considered but Rejected

Section 15126.6(c) of the State CEQA Guidelines states, "Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic Project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental effects."

State CEQA Guidelines Section 15126.6(f) states that the Lead Agency should consider site suitability, economic viability, availability of infrastructure, general plan consistency, other regulatory limitations, jurisdictional boundaries, and the proponent's control over alternative sites in determining the range of alternatives to be evaluated in an EIR.

With respect to alternative locations, State CEQA Guidelines Section 15126.6(f)(2)(A) states that alternative locations need not be evaluated in every case. The key question in determining whether to evaluate alternative locations is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any significant effects need be evaluated in the EIR. State CEQA Guidelines Section 15126(f)(3) states that alternatives that are remote or speculative, or the effects of which cannot be reasonably predicted, need not be considered.

The following alternatives were considered and rejected:

- Rezone Single-Family Residential Sites to Multi-Family Residential in Proximity to El Camino Real (i/e., within ½ mile)
- Increased Multi-Family Housing on the Town Hall Site
- Alternative Location
- Reduced Size Project

1. *Rezone Single-Family Residential Sites to Multi-Family Residential in Proximity to El Camino Real (i.e., within ½ mile).* This alternative would increase the number of multi-family units closer to a main transit corridor (El Camino Real) by rezoning parcels from single-family residential to allow development of higher density housing (similar to the proposed multi-family residential development for the Town Hall and Tobin Clark sites). However, limitations related to site suitability and other regulatory or jurisdictional

considerations could not be reasonably ascertained; in addition, the ability to provide upgrades to existing infrastructure and public services to serve a large increase in high-density housing during the time period of the housing element appeared infeasible. Therefore, this chapter does not discuss an alternative to rezone single-family parcels within ½ mile of El Camino Real to multi-family residential.

2. *Increased Multi-Family Housing on the Town Hall Site.* This alternative would consider increasing the number of higher density multi-family housing on the Town Hall site, already identified in the Draft 2023 – 2031 Housing Element for 16 multi-family units, to take greater advantage of rezoning this site to allow multi-family uses (see Housing Element Appendix C). However, because the Town would like this site to provide housing for employees who may have families and need bigger units, the City Council chose to pursue a plan for a total of 16 housing units at the Town Hall Site, with additional units being allocated to the other Town-owned opportunity site, Tobin Clark. Therefore, this chapter does not discuss an alternative that increases the number of units at the Town Hall housing opportunity site.

3. *Alternative Project Locations.* The proposed Project (Focused GPU) involves updating the relevant elements of the 2005 Hillsborough General Plan to meet current State requirements for planning for new housing within Hillsborough. An alternative location for the proposed Project would not be feasible because the Project is to plan for housing and minimize environmental hazards within the Town of Hillsborough. None of the proposed Project objectives would be attained if locations outside Hillsborough were considered. Therefore, an alternative project location is not considered a feasible project alternative.

4. *Reduced Size Project.* The proposed Project (Focused GPU) consists of revising the Town's current Housing Element to reflect the Town's RHNA of 554 units. In addition to the mandatory RHNA assignment, the Project also includes planning for accessory dwelling units (ADUs) and density bonus units as allowed by State housing law, as well as buffer sites required by HCD. Thus, the total number of units planned for in the 2023 to 2031 Housing Element is 605 units (see Table 3.3-2 in Project Description).

   The proposed Project would result in significant and unavoidable impacts, as well as impacts that are reduced to less than significant with mitigation. However, consideration of a reduced size project alternative with a smaller number of sites available for residential development accommodating a smaller number of housing units in order to reduce the significant impacts identified in the EIR is infeasible because it would not allow the Town to prepare a Housing Element Update that meets the RHNA requirements or State housing law. Thus, a reduced project alternative would not meet the Town's project objectives for the Housing Element Update and is not a feasible project alternative.

5.4 Alternatives Selected

The following alternatives have been evaluated in comparison to the proposed Focused GPU:

- Alternative 1: No Project

- Alternative 2: Reduced VMT

Per CEQA Guidelines Section 15126.6(d), the discussion of impacts associated with the alternatives is less detailed than the evaluation included in Chapters 4.1 through 4.16. Table 5.4-1 summarizes the development assumptions of each alternative. Later in this chapter, Table 5.6-1 summarizes the potential impacts of the alternatives compared to the impacts associated with implementation of the Project. The alternatives' potential impacts are evaluated in the following Sections 5.3 through 5.5.

In accordance with State CEQA Guidelines Section 15126.6, (1) an "environmentally superior alternative" has been identified, and (2) the discussion of the impacts of the alternatives is less detailed than the discussions in the environmental topic chapters.

Table 5.4-1:Land Use Alternatives' Development Assumptions

Land Use	Existing Conditions	Net Change		
		Proposed Focused GPU	Alternatives	
			1. No Project/Existing Housing Element/ General Plan	2. Reduced VMT Alternative
Residential (units)	3,750	+554[1]	+318	+554[1]

Source: MIG, Inc., September 2023.

1 While total housing to be developed under the proposed Project would not exceed the required 554 RHNA units, the locations of all proposed sites, including the 51 "buffer" sites are considered as appropriate in the impact analysis with respect to provision of services, availability of infrastructure to connect to the sites, adequate access, etc.

5.4.1 Alternative 1: No Project/Existing Housing Element/2005 General Plan

State CEQA Guidelines Section 15126.6(e) requires an EIR to analyze the specific alternative of "No Project". The purpose of describing and analyzing the No Project Alternative is to allow decision makers to compare the impacts of approving a proposed project with the impacts of not approving the proposed project. The No Project Alternative must discuss the existing conditions at the time the EIR notice of preparation is published, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the "no project" alternative, then the EIR is also required to identify an environmentally superior alternative among the other alternatives evaluated.

Additionally, State CEQA Guidelines Section 15126.6(e)(3)(A) states that when the project is the revision of an existing land use or regulatory plan, the "No Project" alternative will be the continuation of the existing plan. Typically, this is a situation where new projects would be proposed under the existing plan. Thus, the impacts of the proposed project would be compared to the impacts that would occur under the existing Housing Element (5th cycle).

Although the No Project Alternative does not meet any of the Project objectives and is not considered a viable project alternative, it is presented below as required by CEQA.

Principal Characteristics

The No Project Alternative (i.e., Existing Housing Element/2005 General Plan) assumes that housing development would occur within the Town as directed by the currently adopted 2014-2022 Housing Element and the 2005 General Plan. The No Project Alternative would generate less housing development within the Town because none of the proposed General Plan land use designations or Zoning Code amendments to facilitate greater housing development (changes to General Plan Land Use designations and Zoning designations to allow multi-family housing) within the Town would occur. However, single-family and ADU opportunities would reasonably continue to be developed without adoption of the 2023 – 2031 Housing Element Update, although the number of ADUs developed would likely be less than the proposed Project because ADU development would not be enhanced, supported, or promoted as it would with implementation of the Focused GPU policies and actions.

Therefore, there would be a decrease in overall housing development that is anticipated under the 2023 – 2021 Draft Housing Element as a result of the No Project alternative.

The No Project Alternative would not allow the Town to meet its RHNA requirement or allow the Town to comply with state housing laws. The Town would face significant, adverse repercussions for not adopting a new Housing Element reflecting the 6th cycle RHNA assignment. State housing law identifies penalties that can be levied against jurisdictions that do not adopt new housing elements. The No Project Alternative would not meet any of the project objectives.

The number of ADUs that could reasonably be developed under the No Project Alternative would be anticipated to follow recent development patterns, as discussed in the Housing Element Update, which would be on the order of 30 ADUs per year[56] for a total development during the period 2023-2031 of approximately 240 ADUs. The other units that could be developed without adoption of the Focused GPU would total 78 units (as identified in the Housing Element Update): 12 pipeline project units; 43 subdivision/lot split units; and 23 housing opportunity site units. Therefore, total development reasonably foreseeable under the No Project alternative would be approximately 318 units[57] (240 plus 78 equals 318).

One of the main differences to consider is the potential legal consequences for the Town by not adopting a new Housing Element reflecting the 6th cycle RHNA assignment. State housing law identifies penalties that can be levied against jurisdictions that do not adopt new housing elements, including:

- Eligibility for grants: A city without a compliant housing element is not eligible for a variety of state grants and loans. Several federal funding programs consider compliance with housing element law as an eligibility or ranking criterion.
- Court approval of housing developments: If a city fails to adopt a compliant housing element, the Housing Accountability Act requires that city to approve any proposed

[56] As indicated in Table 3.2 “ADU Building Permits Issued By Year” of the Housing Element Update (p. 23), the annual average development of ADUs during the 8-year period 2014-2022 equaled approximately 29.44 units (or approximately 30 ADUs per year).

[57] In essence, the total units under the No Project alternative would differ from the proposed Project by elimination of all 116 proposed multi-family units and a reduction of ADU development to 240 units.

housing development project that has 20% of units set aside for low-income residents or 100% of units set aside for middle-income residents irrespective of its compliance with the applicable zoning or general plan (Cal. Gov. Code § 65589.5(d)).

- Fines and fees: If a court finds a city to be out of compliance, the court can order the city to pay fines to the California state housing trust fund, attorney's fees to the plaintiff, or both. Cal. Gov. Code § 65585(l)(1) defines an escalating structure of fines with a minimum amount of $10,000 per month and a maximum of $100,000 per month. Continued failure to achieve a certified Housing Element allows the court to multiply the fines by a factor of three per month and later a factor of six per month.
- Legal suits and attorney fees: Local governments with noncompliant housing elements are vulnerable to litigation from housing rights' organizations, developers, and HCD. If a jurisdiction faces a court action stemming from its lack of compliance and either loses or settles the case, it often must pay substantial attorney fees to the plaintiff's attorneys in addition to the fees paid to its own attorneys. Potential consequences of lawsuits include mandatory compliance within 120 days, suspension of local control on building matters, and court approval of housing developments.
- Loss of permitting authority: Courts have authority to take local government residential and nonresidential permit authority to bring the jurisdiction's General Plan and housing element into substantial compliance with State law. The court may suspend the locality's authority to issue building permits or grant zoning changes, variances, or subdivision map approvals (Cal. Gov. Code § 65755(a)).

Analysis of No Project Alternative

The potential impacts associated with the No Project alternative are described below.

A. *Aesthetics.* Under the No Project Alternative, there would be less than significant impacts related to scenic vistas and scenic resources within a state designated highway and conflicts with applicable zoning or other Town regulations governing scenic quality, similar to the proposed Project. Development under the No Project would generally continue in a manner similar to the proposed Project though fewer residential units would be anticipated and no multi-family development would occur. The Town's existing development standards would ensure that new sources of light and glare created by single-family development would be less than significant. Because no multi-family units in multiple story buildings would be developed, the significant and unavoidable impacts of developing the Tobin Clark site would not occur. The aesthetic design and character of the Town would be generally maintained under the No Project alternative, and as such, this alternative would reduce aesthetic impacts or have less-than-significant impacts as opposed to the to the proposed Project which has significant and unavoidable aesthetic impacts from development of the Tobin Clark site.

B. *Air Quality.* Under the No Project alternative, fewer residential units would be anticipated and no multi-family development would occur. However, this alternative would still result in a similar significant and unavoidable impact related to 2017 Clean Air Plan control measures due to the geographic extent of development and the limited VMT reductions for new residential construction. This alternative would have characteristics similar to the proposed Project such as length of distances to travel for work or shopping, lack of available public transportation options, no commercial opportunities in Town, etc. (see "N. Transportation,"

below). The reduction in total units would result in a decrease in overall air pollution emissions compared to the proposed Project and a similar less-than-significant impact. However, the No Project Alternative would also be inconsistent with one of the control measures identified in the 2017 Clean Air Plan related to VMT from land use planning, resulting in significant and unavoidable impacts from plan inconsistency, similar to the proposed Project. The air quality impacts under this alternative, though possibly somewhat reduced, would still require the implementation of the project proposed mitigation measures.

C. *Biological Resources.* As with the proposed Project, development under the No Project alternative could result in significant impacts related to special-status plant and wildlife species and their habitat, and other biological resources such as streams, riparian habitat, and tree protection/removal. The No Project alternative would not facilitate the residential development as aggressively as the proposed project but the construction of ADUs and development of the 23 single-family lots and the subdivision parcels could still occur under the No Project Alternative. Under the No Project Alternative, the development of the Tobin Clark site would not occur. However, the proposed Project recommends Mitigation Measures Bio-1 through Bio-4 to minimize the impacts future residential housing would have on biological resources. Particularly, Mitigation Measure BIO-4 would not be adopted and implemented requiring an Ordinance be adopted to protect wetland and riparian resources. Because of the larger number of housing units included in the proposed Draft 2023 – 2031 Housing Element and the land disturbance associated with developing the Housing Opportunity Sites, particularly the Tobin Clark site, the No Project Alternative would have fewer biological resource impacts.

D. *Cultural Resources and Tribal Cultural Resources.* As with the proposed Project, development under the No Project alternative could uncover previously unknown cultural resources or destroy/change structures that could be considered historic resources, or tribal cultural resources, or previously unrecorded human remains during construction. This alternative would result in similar less-than-significant impacts to cultural and tribal resources and potentially significant and unavoidable impacts to historic resources as discussed in Chapter 4.4 Cultural Resources and Tribal Cultural Resources. This alternative would have similar impacts to cultural, historic, and tribal resources as the proposed Project.

E. *Energy.* Given the overall reduced amount of development associated with the No Project alternative (318 units vs. 554 units assigned RHNA), there would likely be less consumption of electricity, natural gas, and vehicle fuel resources than under the proposed Project. Similar to the proposed Project, new development and land use turnover under this alternative would be required to comply with statewide mandatory energy requirements outlined in Title 24, Part 6, of the California Code of Regulations (the CALGreen Code), which would decrease estimated natural gas consumption in new and/or retrofitted structures. The No Project alternative would have less energy usage compared to the proposed Project because of its reduced development.

F. *Geology and Soils.* As with the proposed Project, development under the No Project alternative would result in the same exposure of residents to the general, existing geologic and seismic hazards within the Planning Area. Existing building requirements would be applicable to all housing projects, whether they are constructed under the proposed Project or under this alternative. The No Project alternative would have similar but somewhat

reduced impacts compared to the proposed Project; however, new subdivisions in landslide areas and on landslide-prone deposits on steep slopes may be subject to greater risk under the No Project alternative because EIR Mitigation Measure GEO-1 would not be implemented (which requires geotechnical reports and appropriate mitigation measures to ensure stabilized sites prior to construction). Impacts related to paleontological resources would be slightly reduced due to the decrease in total development (and development area) under the No Project alternative but Mitigation Measure GEO-2 protecting paleontological resources during construction would not be adopted.

G. *Greenhouse Gas Emissions.* Overall GHG emissions associated with the No Project alternative would likely be somewhat reduced compared to the proposed Project due to removal of the multi-family units on Town-owned sites. As noted in Chapter 4.6 Greenhouse Gas Emissions, GHG emissions due to the Town's residential and other land uses would increase by 2040 under the proposed Project compared to emissions levels estimated to occur in 2040 without the Project. There would be a projected increase in efficiency on a per capita efficiency basis, but this increase in efficiency would be nominal and would still not be consistent with near- or long-term State GHG reduction goals. With the No Project alternative, there would likely be a decrease in the amount of GHG emissions from development. However, because development under the No Project alternative would not benefit from mitigation measures identified for the proposed Project, the reductions under the No Project alternative would not likely be substantial enough to meet State GHG reduction goals. As with the proposed Project, development under the No Project alternative would be subject to all applicable local, State, and federal regulations and programs related to GHG emissions reductions. Therefore, under the No Project alternative there would be similar significant and unavoidable impacts.

H. *Hazards and Hazardous Materials.* Under the No Project alternative, all development would be subject to applicable federal, State, local laws and regulations including Town of Hillsborough policies and actions regarding hazardous material handling and management, as under the proposed Project. There would be reduced risk from routine transport, use, or disposal of hazardous materials under the No Project Alternative due to reduced development activity. Risks of contamination from potential Cortese list sites would generally remain the same because most of the development sites under the No Project alternative are the same as under the proposed Project. Emergency response/evacuation planning and risks from wildfire (see "Wildfire" below for more discussion) would be reduced under the No Project alternative because development of the Tobin Clark site would not occur. However, EIR Mitigation Measure HAZ-1 (calling for Phase I and possibly Phase II environmental assessments) would not be implemented under the No Project alternative, which could result in an increased risk from accidental exposure of workers and/or the public to unknown hazardous materials. As such, this alternative would slightly greater but still less-than-significant impacts compared to the proposed Project.

I. *Hydrology and Water Quality.* The No Project alternative would create less new impervious surface area compared to the proposed Project. Development under this alternative would also be subject to all existing hydrology water quality regulations and programs, including regulations and programs intended to reduce potential impacts related to runoff, soil erosion, and flooding. Compared to the proposed Project, the No Project alternative also have no impact related to groundwater. Due to the largely developed nature of the Planning Area and

requirements for future development to comply with the MRP standards, BMPs, and LID-based site design and stormwater treatment controls, development under the No Project alternative would not generate substantial off-site flooding during storm events. These impacts would be similar though slightly reduced compared to the proposed Project. However, Mitigation Measure HYD-1would not be implemented under this alternative. Because this mitigation measure calls for development and adoption of General Plan Public Safety Element goals, policies, and actions consistent with the requirements of Government Code §65302(g) and as addressed in OneShoreline's "Planning Policy Guidance to Protect and Enhance Bay Shoreline Areas of San Mateo County," development occurring under the No Project alternative could be subject to greater impacts related to sea level rise. Existing General Plan policies, Municipal Code requirements, MRP requirements, and FEMA floodplain development standards would reduce potential these flooding impacts to a certain extent, but significant hydrology and water quality impact related to flooding under the No Project alternative would be greater than for the proposed Project.

J. *Land Use and Planning.* As with the proposed Project, the No Project alternative would not physically divide an established community and nor would it conflict with regulations adopted to avoid environmental effects. Though there would be less development under the No Project alternative compared to the proposed Project (fewer ADUs; no multi-family units), total development anticipated throughout the Town under the No Project alternative would be slightly more than half that anticipated under the proposed Project (318 units versus 554 units). The proposed Project would rezone the Tobin Clark site from Open Space to multi-family residential uses which is inconsistent with General Plan polices focused on the preservation of open space and the protection of habitat and biological resources. This inconsistency with adopted land use policies is not considered to be a significant land use impact because the General Plan land use designation of Open Space was not placed on the Tobin Clark parcels to avoid significant environmental impacts. Impacts related to land use would be somewhat reduced under the No Project compared to the proposed Project, but still less than significant.

K. *Noise.* The No Project alternative would generate less construction noise than the proposed Project due to the decreased amount of residential development that would occur and would contribute less to vehicle roadway noise. For residents near a housing construction project, construction noise would still be the same, though as discussed in Chapter 4.11 Noise, this would be a temporary and less than significant impact. Under the No Project alternative, the Town Hall site would not be redeveloped, and the Tobin Clark site would not be developed with multi-family residential uses, thus eliminating noise from these large projects. Noise impacts under the No Project alternative would be less than under the proposed Project.

L. *Population and Housing.* Under the No Project alternative there would be fewer housing units constructed and less of a population increase than under the proposed Project. The No Project alternative would result in fewer impacts related to population growth compared to the proposed Project; however, these impacts under the proposed Project are already less than significant.

M. *Public Services and Recreation.* The population increase estimated under the No Project alternative would be less than under the proposed Project (No Project = 731 total population increase; Proposed Project = 1,274 total population increase), and therefore there would be

a decrease in demand for public services and recreational facilities compared to the proposed Project. This would result in a similar but reduced public services and recreation impacts for the No Project alternative compared to the proposed Project.

N. *Transportation.* The EIR analysis found the impacts of the proposed Project on transportation (transportation plan consistency, bike and pedestrian facilities, hazards, and access), to be less than significant but that the impact related to vehicle miles traveled (VMT) impacts would be significant and unavoidable. Under the No Project alternative, there would be similar less than significant impacts for all but the VMT impact. The VMT impact would remain significant and unavoidable under the No Project alternative because one of the major factors influencing the VMT impact was the geographic location of housing development, primarily in the western areas of Town (i.e., farther away from El Camino Real and its transit opportunities). Although the total number of housing units under the No Project alternative would be fewer than under the proposed Project, given that the EIR analysis determined that there was no practicable way to reduce Project VMT impacts due to these relatively distance locations, the No Project alternative would also result in similar constraints. (See "5.4.2 Reduced VMT Alterative" below.) Therefore, despite a reduced number of housing units, including ADUs developed this impact would still be considered significant and unavoidable under the No Project alternative and would have Transportation impacts similar to the proposed Project.

O. *Utilities and Service Systems.* Compared to the proposed Project, the No Project alternative would result in a reduced amount of housing development and would be expected to result in a decrease in demand for utility services, which would potentially require less infrastructure improvements and/or expansions in the Planning Area. Because development of multi-family housing on the Tobin Clark site would not occur under the No Project alternative, there would be no impacts related to utility pipeline extensions for that site. Similarly, development under the No Project alternative would result in a reduced demand for water and a decrease in the generation of wastewater and solid waste/recyclables. Because water demand and wastewater and solid waste/recyclables generation are considered less than significant impacts under the proposed Project, they would also be less than significant under the No Project alternative. The No Project alternative would have fewer demands on utility services than the proposed Project.

P. *Wildfire.* Although development under the No Project alternative would be reduced compared to the proposed Project, evacuation-related impacts could be greater under the No Project alternative because Mitigation Measure WILD-1 would not be implemented; however, because development of multi-family housing on the Tobin Clark site would not occur under the No Project alternative, there would be no significant and unavoidable evacuation-related impact for that site. In general, development under the No Project alternative would not benefit from new programs proposed in Mitigation Measure WILD-1. Development under the No Project alternative would have other similar impacts compared to the proposed Project: wildfire-related pollutant concentration exposure, impacts from necessary infrastructure improvements, potential post-fire slope instability or drainage, and risk to people and structures from wildfire exposure; these impacts, under the No Project alternative, would also be similarly less than significant due to existing Town policies and CCCD programs. However, because the No Project would not result in the development of the Tobin Clark with up to 100 units of multi-family housing that would exacerbate already

deficient emergency evacuation, this alternative is considered to have less wildfire impacts than the proposed Project.

Attainment of Project Objectives

The No Project Alternative would only partially meet the following project objectives:

1. Affirmatively further fair housing, and take meaningful actions to overcome patterns of segregation, promote fair housing choice, eliminate disparities in opportunities, and foster inclusive communities free from discrimination.

2. Provide adequate housing for all segments of the population, within the Town's constraints; promote and assist in the development of housing that meets the needs of special needs communities in Hillsborough while protecting the character of the Town.

The No Project Alternative would not meet the following project objectives:

1. Promote the preservation and improvement of existing housing and neighborhoods, and promote new housing growth to provide more affordable and market rate housing that meets the Town's Cycle 6 Regional Housing Needs Allocation (RHNA).

2. Meet housing needs by encouraging a variety of housing development affordable at all income levels, including construction of Accessory Dwelling Units (ADUs), multi-family housing on Town-owned land, subdivision/lot split opportunity sites, and other housing choices on vacant opportunity sites, private recreational sites, and institutionally owned sites.

3. Reduce, remove, and/or mitigate potential governmental constraints and barriers to housing development and promote equal housing opportunities for all people; incorporate best practices related to land use, racial equity, mobility, housing affordability, safety, environmental justice, community services, and healthy neighborhoods.

4. Engage residents and stakeholders to generate ideas for potential Town-specific approaches to meet the Town's Cycle 6 RHNA, gain insight on the greatest challenges and opportunities that face Hillsborough, and ensure equitable and inclusive processes, policies, investments, and service systems.

5. Expand and update technology and innovative practices to create smart, sustainable communities, and adaptable infrastructure systems.

6. Protect lives and property from risks associated with wildfire-related emergencies; reduce the potential loss of life, injury, and property damage due to flooding, and seismic and geologic hazards.

5.4.2 Alternative 2: Reduced VMT Alternative

The proposed Project would have significant and unavoidable project level and cumulative VMT impacts stemming from the lack of transit services within the Town and the difficulty in mitigating

VMT impacts from small residential developments. A Reduced VMT Alternative is presented in this EIR to fulfill CEQA requirements for presenting alternatives to the proposed Project that reduce identified impact.

Under the Reduced VMT Alternative, housing proposed in the Draft Housing Element (identified Housing Opportunity Sites) would be relocated from high VMT TAZ to lower VMT TAZ to achieve an overall reduction in Project VMT.

The identification of housing opportunity sites to be included in the Reduced VMT Alternative was informed by the VMT modeling results obtained from the C/CAG-VTA model for the Town of Hillsborough. The VMT per capita – the metric for evaluating transportation impacts associated with residential development – is somewhat variable across the six Hillsborough Traffic Analysis Zones (TAZs), as the difference between the lowest and highest TAZs is 3.3 VMT per capita. The highest VMT zone has a VMT per capita that is 17 percent higher than the lowest zone. Therefore, by reallocating proposed residential units from zones with higher VMT to those with a lower VMT, there is the potential to reduce the VMT for the Housing Element as a whole.

It is noted that the VMT per capita does not reflect the varying characteristics of sites within each TAZ, as the VMT per capita is derived from all development in each zone. (See Figure 5.4-1), TAZ within Hillsborough and VMT per Capita.) In Hillsborough, given the hilly topography in some neighborhoods and the concentration of transit service along the El Camino Real corridor, some sites would be expected to generate considerably less VMT per resident than others. Other site characteristics that would influence the potential VMT reduction include access to retail and services and availability of pedestrian infrastructure. There are two housing opportunity sites where multi-family housing has been proposed that could potentially accommodate additional units. This Reduced VMT alternative assumes that additional units at these sites would be reallocated from higher VMT zones and would not increase the overall number of proposed units.

Principal Characteristics

The discussion below describes the VMT reduction that could be achieved by reallocating units from the Strawberry Hill site – a proposed subdivision in a relatively high VMT zone – to the Town Hall and/or Tobin Clark sites, which are located in zones with a lower VMT and have both been identified in the Housing Element as locations for multi-family housing. While this is not a project-level VMT analysis, the model-generated VMT per capita is assumed to generally reflect the impacts of future projects. Specific characteristics of the sites that would be expected to influence VMT are identified to provide additional clarification.

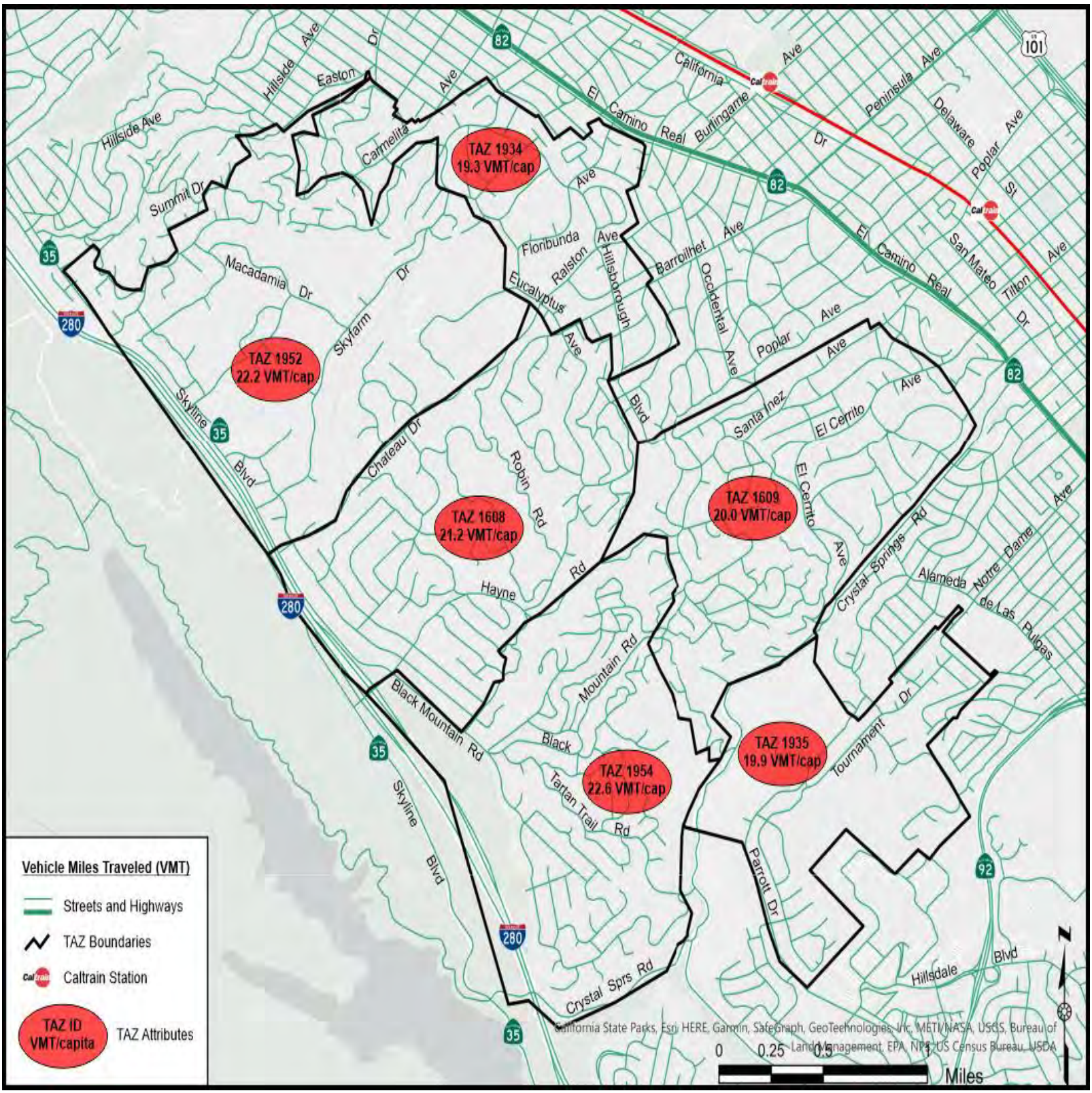


Figure 5.5-1 TAZ within Hillsborough and VMT per Capita

A. *Aesthetics.* Under the Reduced VMT alternative, there would similar less than significant impacts on scenic vistas and scenic resources within a state designated highway and no conflict with applicable zoning or other Town regulations governing scenic quality compared to the proposed Project. Development under the Reduced VMT alternative would relocate some units from the hilly areas in Town to sites designated for multi-family development closer to El Camino Real, which would result in increased development density and slightly increased aesthetic impacts related to existing visual character and quality and light and glare impacts. However, as with the Proposed Project, because implementation of Mitigation AES-1, which would establish design guidelines or criteria for multi-family housing development to ensure that impacts from the increased density of multi-family development would be less than significant, cannot be guaranteed, under the Reduced VMT alternative this would also be a significant and unavoidable impact. Because the amount of other development in Town would be reduced compared to the proposed Project, the aesthetic design and character of the Town would be generally maintained under the Reduced VMT alternative, and as such, this alternative would have similar less-than-significant impacts compared to the proposed Project.

B. *Air Quality.* Development facilitated under the Reduced VMT alternative would result in a similar significant and unavoidable impact related to 2017 Clean Air Plan control measures due to the limited VMT reductions for new residential construction (see “N. Transportation,” below). This alternative includes the same total number of units as the proposed Project and would generally result in the same overall air pollution emissions compared to the proposed Project. Overall, the air quality impacts under this alternative would generally be the same as the proposed Project, and implementation of Mitigation Measures AIR-2a and AIR-2b would similarly reduce impacts to less-than-significant.

C. *Biological Resources.* As with the proposed Project, development under the Reduced VMT alternative could result in significant impacts related to special-status plant and wildlife species and their habitat, and could result in significant unavoidable biological resources pertaining to streams and riparian habitat, and tree protection/removal. While the Reduced VMT alternative would reduce the amount of potential development in parts of the Planning Area (i.e., generally the western “hilly” areas), there would still be impacts due to the development of the Tobin Clark site. If additional buildings are proposed to accommodate the relocated units at the Tobin Clark site, there could be increased biological resources impacts compared to the proposed Project due to greater ground disturbance for more or larger building footprints; however, if the relocated units were accommodated through taller buildings, this alternative would likely have generally the similar impacts as the proposed Project. As discussed in Chapter 4.3 Biological Resources, Mitigation Measures BIO-1 through BIO-4 would reduce these impacts to less than significant; however, if Mitigation Measure BIO-4 (Stream Protection Ordinance) could not be adopted, then impacts to riparian and wetland habitats could be significant and unavoidable. Therefore, unless this alternative requires a separate site not otherwise considered in this EIR, which would require evaluation of its own specific site characteristics, this alternative would have similar potentially significant and unavoidable impacts as the proposed Project.

D. *Cultural Resources and Tribal Cultural Resources.* Though the relocation of some housing sites from “western” parts of the Town to the designated multi-family sites could result in slightly reduced cultural resources impacts because of a reduction in overall ground

disturbance. Development under the Reduced VMT Project alternative could still uncover previously unknown cultural or tribal cultural resources, or destroy/change structures that could be considered historic resources, or have the potential to disturb previously unrecorded human remains during construction, similar to the proposed Project. This alternative would also result in similar -significant unavoidable impacts due to potential impacts on historic properties and/or structures, as discussed in Chapter 4.4 Cultural Resources, The Reduced VMT Alternative would have similar cultural and tribal cultural resource impacts.

E. *Energy.* Given the same total amount of development (number of units) associated with the Reduced VMT Project alternative compared to the proposed Project, there would generally be similar consumption of electricity, natural gas, and vehicle fuel resources, although an increase in multi-family density could result in a somewhat reduced energy use. Similar to the proposed Project, new development and land use turnover under this alternative would be required to comply with statewide mandatory energy requirements outlined in Title 24, Part 6, of the California Code of Regulations (the CALGreen Code), which would decrease estimated natural gas consumption in new and/or retrofitted structures. In general, the Reduced VMT alternative would have a similar energy usage compared to the proposed Project but would be reduced to less-than-significant with implementation of Mitigation Measures ENG-1a and ENG-1b, as with the proposed Project.

F. *Geology and Soils.* Development under the Reduced VMT alternative would result in the same general, existing geologic and seismic hazards within the Planning Area. As with the proposed Project, existing building requirements would be applicable to all housing projects, and this alternative would have similar impacts compared to the proposed Project. However, development formerly proposed for areas prone to landslide or on landslide-prone deposits on steep slopes that are relocated to the multi-family developments would result in a reduced impact. Impacts related to paleontological resources could be slightly reduced due to a decrease in ground disturbance, though this would depend on specific project plans and building footprints and would not be a substantial reduction. Mitigation Measure GEO-1 would ensure impacts of development facilitated under the Reduced VMT alternative would be less than significant, similar to the proposed Project. Mitigation Measure GEO-2 would ensure protection of paleontological resources discovered during project development activities.

G. *Greenhouse Gas Emissions.* Overall GHG emissions associated with the Reduced VMT Project alternative would be similar compared to the proposed Project due to the same total amount of proposed development and the limited reduction in VMT (see “N. Transportation,” below). As noted in Chapter 4.6 Greenhouse Gas Emissions, GHG emissions due to the Town’s residential and other land uses would increase by 2040 under the Focused GPU compared to emissions levels estimated to occur in 2040 without the Focused GPU. There would be a projected increase in efficiency on a per capita efficiency basis, but this increase in efficiency would be nominal and would still not be consistent with near- or long-term State GHG reduction goals. Similar to the proposed Project, the Reduced VMT alternative results in similar GHG emissions from development; however, these reduced GHG emissions would likely not be substantial enough to meet State GHG reduction goals. As with the proposed Project, development under the Reduced VMT alternative would have similar significant and unavoidable impacts.

H. *Hazards and Hazardous Materials.* Under the Reduced VMT alternative and similar to the proposed Project, all development would be subject to applicable federal, State, local laws and regulations including Town of Hillsborough policies and actions regarding hazardous material handling and management, as under the proposed Project. There could be slightly reduced risks from routine transport, use, or disposal of hazardous materials, as well as risks to existing or proposed schools due to the relocation of some proposed development to the multi-family sites. Risks of contamination from potential Cortese list sites could be slightly reduced due to this relocation of development, as could airport safety risks. Mitigation Measure HAZ-1 calling for Phase I and possibly Phase II environmental assessments would reduce impacts from the Reduced VMT alternative to less than significant, similar to the proposed Project. Emergency response/evacuation planning and risks from wildfire may also be reduced compared to the proposed Project due to relocation of some proposed housing in the hilly areas to the multi-family sites, with the exception of development on the Tobin Clark site (see Chapter 4.16 Wildfire).

I. *Hydrology and Water Quality.* Development under the Reduced VMT alternative would create slightly less new impervious surface area compared to the proposed Project due to the relocation of some units. However, development under this alternative would be subject to all existing hydrology water quality regulations and programs, including regulations and programs intended to reduce potential impacts related to runoff, soil erosion, and flooding. The Reduced VMT alternative would also have no impact related to groundwater, as would the proposed Project. Similar to the proposed Project, the Reduced VMT alternative would not generate substantial off-site flooding during storm events due to compliance with MRP standards, BMPs, and LID-based site design and stormwater treatment controls. In addition, because it cannot be guaranteed at this time that the forthcoming goals, policies, and/or actions to implement HYD-1 would reduce the effects of future residential development facilitated by the Project related to flooding and pollutant release sufficiently to reduce potential effects to less than significant, this impact would be ***significant and unavoidable***.

J. *Land Use and Planning.* As with the proposed Project, the Reduced VMT alternative would not physically divide an established community and nor would it conflict with regulations adopted to avoid environmental effects. Under the Reduced VMT alternative, there would be the same total development (554 units) as under the proposed Project. Impacts related to land use would essentially be the same under the Reduced VMT alternative as under the proposed Project and would be less than significant.

K. *Noise.* The Reduced VMT alternative would generate construction noise similar to the proposed Project, however, the specific locations may be different due to the relocation of some units from the western areas of Town to the multi-family sites (Town Hall and Tobin Clark). Residents near a housing construction project would still experience the same general level of construction noise as with the proposed Project, although as discussed in Chapter 4.11 Noise, this would be a temporary and less than significant impact. Noise impacts under the Reduced VMT alternative would be similar to the proposed Project.

L. *Population and Housing.* Under the Reduced VMT alternative the same number of housing units would be constructed, resulting in the same population increase as under the proposed Project. There would be similar impacts related to population growth and induced growth compared to the proposed Project, but because these impacts under the proposed Project

are already less than significant, they would also be less than significant under the Reduced VMT alternative.

M. *Public Services and Recreation.* The population increase under the Reduced VMT alternative would be the same as under the proposed Project, and therefore there would be similar demands for public services and recreational facilities compared to the proposed Project. This would result in similar public services and recreation impacts for the Reduced VMT alternative compared to the proposed Project, but they are already less than significant under the proposed Project.

N. *Transportation.* Impacts of development under the Reduced VMT alternative would be similar to the proposed Project related to transportation plan consistency; bike and pedestrian facilities; and hazards and access, which have been identified as less than significant. With respect to impacts related to vehicle miles traveled (VMT), based on the differences in VMT per capita between the respective TAZs of the proposed housing sites to be relocated, it is estimated that residential units reallocated from the Strawberry Hill site to the Town Hall or Tobin Clark site would reduce VMT per capita for those units by 10 to 15 percent. This level of reduction is considerable from a VMT perspective, however, because it would still result in residential VMT per capita levels that exceed the applied significance threshold for the Project, this would still be a significant and unavoidable VMT impact.

O. *Utilities and Service Systems.* Compared to the Project, the Reduced VMT alternative would result in the same amount of housing development and would be expected to result in similar demand for utilities services, including similar infrastructure improvements and/or expansions in the Planning Area. Development of multi-family housing on the Tobin Clark site may increase in density to accommodate relocated units. However, development under the Reduced VMT alternative would result in similar demand for water and a similar generation of wastewater and solid waste/recyclables. Because these are less than significant impacts under the proposed Project, they would also be less than significant under the Reduced VMT alternative.

P. *Wildfire.* Development totals under the Reduced VMT alternative would be the same compared to the proposed Project, and this alternative would have similar impacts as the proposed Project, such as wildfire-related pollutant concentration exposure, impacts from necessary infrastructure improvements, potential post-fire slope instability or drainage, and risk to people and structures from wildfire exposure. These impacts would also be similarly less than significant under the Reduced VMT alternative due to existing Town policies and CCCD programs. Evacuation-related impacts could be somewhat increased under the Reduced VMT alternative due to relocated development that might be placed on the Tobin Clark site. In general, development under the Reduced VMT alternative would benefit from new programs proposed in Mitigation Measure WILD-1, however, this impact would remain significant and unavoidable.

Attainment of Project Objectives

The Reduced VMT Alternative would only partially meet the following objective but would meet all of the other project objectives:

1. Meet housing needs by encouraging a variety of housing development affordable at all income levels, including construction of Accessory Dwelling Units (ADUs), multi-family housing on Town-owned land, subdivision/lot split opportunity sites, and other housing choices on vacant opportunity sites, private recreational sites, and institutionally owned sites.

This objective would be only partially met because the units proposed for the subdivision/lot split opportunity sites would be relocated to a multi-family site, though the total number of housing units would remain the same as the Proposed Project, if on fewer sites.

5.5 Summary of Attainment of Project Objectives

As described above, the No Project Alternative does not meet most of the project objectives and would mean the Town would not be in compliance with State laws regarding General Plan Housing Elements. If this alternative was selected, the Town would be subject to the significant penalties for not adopting a Housing Element reflecting the 6th cycle RHNA assignment.

The Reduced VMT Alternative would meet all but one of the Town's stated project objectives and would partially meet that one remaining objective; however, none of the identified significant and unavoidable impacts would be reduced to a level of less than significant.

5.6 Environmentally Superior Alternative

If an alternative is considered clearly superior to the proposed project relative to identified impacts, Section 15126.6 of the CEQA Guidelines requires that alternative to be identified as the environmentally superior alternative. By statute, if the environmentally superior alternative is the No Project Alternative, an EIR must also identify an environmentally superior alternative among the other alternatives. The identification of the environmentally superior alternative does not consider the ability of the alternative to meet the stated project objectives; it focuses on environmental impacts only.

Per CEQA Guidelines Section 15126.6(d), the discussion of impacts associated with the alternatives is less detailed than the evaluation included in Chapters 4.1 through 4.16. Table 5.4-1 summarizes the development assumptions of each alternative. Table 5.6-1 summarizes the potential impacts of the alternatives compared to the impacts associated with implementation of the Project. The alternatives' potential impacts are evaluated in Section 5.3.

Table 5.6-1: Alternatives Impacts Compared to Project Impacts			
Impact/Resource	**Proposed Project**	**Alternative 1: No Project**	**Alternative 2: Reduced VMT Alternative**
Aesthetics	SU with Mitigation	LTS	Similar SU with Mitigation
Air Quality	SU with Mitigation	Similar SU	Similar SU, with Mitigation
Biological Resources	LTS with Mitigation	Reduced LTS	Similar LTS with Mitigation
Cultural Resources and Tribal Cultural Resources	SU with Mitigation	Similar LTS	Similar SU with Mitigation
Energy	LTS with Mitigation	Similar LTS	Similar LTS with Mitigation
Geology and Soils	LTS with Mitigation	Slightly greater LTS	Similar LTS with Mitigation
Greenhouse Gas Emissions	SU with Mitigation	Similar SU	Similar SU, with Mitigation
Hazards and Hazardous Materials	LTS with Mitigation	Slightly greater LTS	Similar LTS, with Mitigation
Hydrology and Water Quality	SU with Mitigation	Slightly greater LTS	SU with Mitigation
Land Use	LTS	Reduced LTS	LTS
Noise	LTS	Reduced LTS	Similar LTS
Population and Housing	LTS	Reduced LTS	Similar LTS
Public Services and Recreation	LTS	Reduced LTS	Similar LTS
Transportation	SU with Mitigation	Similar SU	Similar SU, with Mitigation
Utilities and Service Systems	LTS with Mitigation	Reduced LTS	Similar LTS with Mitigation
Wildfire	SU with Mitigation	LTS	Similar SU, with Mitigation
Source: MIG, 2023 LTS= Less than Significant Impacts SU= Significant and Unavoidable Impacts			

While the No Project Alternative would result in similar or reduced impacts compared to the Project due to the decreased amount of development proposed compared to the proposed Project, the No Project Alternative would not meet State laws regarding both the Housing and Safety Elements.

The Reduced VMT alternative would be superior to the proposed Project because it would reduce the VMT impacts associated with the proposed Project while meeting the Town's RHNA. Any other reduction in impacts would not be substantially different from the proposed Project, but the Reduced VMT alternative would comply with State law and would satisfy all but one of the Town's objectives. Therefore, the Reduced VMT alternative is considered the environmentally superior alternative.

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CHAPTER 6 CEQA MANDATED SECTIONS INCLUDING CUMULATIVE IMPACTS

6.1 Impacts Found Less than Significant

6.1.1 Agriculture and Forestry Resources

The CEQA Guidelines have determined that a project would have a significant impact on agriculture and forestry resources if it would:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use,

b) Conflict with existing zoning for agricultural use or conflict with a Williamson Act contract,

c) Result in the loss of forest land or conversion of forest land to non-forest use, or

d) Involve other changes in the existing environment that, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use.

The Planning Area contains mostly residential land uses, with some institutional uses and open space. The California Department of Conservation (CDOC) Farmland Mapping and Monitoring Program identifies the Town as predominantly Urban and Built-up Land (over 75 percent) with the remainder identified as Other Land ("other land" includes land uses that are not included in any other farmland mapping category, such as low density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing; and vacant and non-agricultural land surrounded on all sides by urban development and greater than 40 acres) (CDOC 2023). These Other Land areas occur in pockets along the western foothills of the Town near the Town's western boundary, with some areas near the Burlingame Country Club, along Robin Road between Chateau Drive and Hayne Road, along portions of Hayne Road east of Denise Drive, and in the southern part of the Town around Crystal Springs Road (both to the north and the south). There is no land in the Planning Area designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. As such, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, and no impact would occur.

There is also no land within the Planning Area designated for agricultural use, and the Town does not contain parcels under a Williamson Act contract (San Mateo County 2023). As such, the Project would have no impact related to agricultural zoning or Williamson Act contract lands, and no conflicts with existing zoning for agricultural uses would occur.

The Town does not contain lands zoned as forest land nor does the Project identify sites zoned for forest land. Because there are no lands zoned as timberland, or timberland zoned Timberland Production areas (as defined in Public Resources Code [PRC] 12220(g) and PRC 4526 or Government Code 51104(g)) within the Town, the Project would therefore not affect forest land or timberland or conflict with existing zoning for forest land.

Because none of the proposed sites are located on agricultural land or land identified for forest or timberland uses, the Project would not result in the conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use, and no impacts related to the conversion of agricultural or forest land to other land uses would occur.

6.1.2 Mineral Resources

The CEQA Guidelines have determined that a project would have a significant impact on mineral resources if it would:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.

b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

The Town of Hillsborough is developed primarily with single-family residences built on large parcels that are intermixed with mature woodland and forest communities, and dense vegetation. There are no mines or known mineral resources in the Town (CDOC 2023). In addition, Hillsborough does not have a history of quarrying or mineral extraction. In addition, there are no active or closed mining operations in Town. However, the State Mining and Geology Board establishes Mineral Resource Zones (MRZs) to designate lands that are known to contain or have the potential to contain mineral deposits, using the following classifications (State Mining and Geology Board 2023):

- MRZ-1: Areas where adequate geologic information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.
- MRZ-2a: Areas underlain by mineral deposits where geologic data show that significant measured or indicated resources are present.
- MRZ-2b: Areas underlain by mineral deposits where geologic information indicates that significant inferred resources are present.
- MRZ-3a: Areas containing known mineral deposits that may qualify as mineral resources.
- MRZ-3b: Areas containing inferred mineral deposits that may qualify as mineral resources.
- MRZ-4: Areas where geologic information does not rule out either the presence or absence of mineral resources.

The Town does not have mineral resource areas as noted in the Open Space & Conservation Element of the General Plan. According to the State mineral land classification maps, the Town is mostly classified MRZ-1 and MRZ-4, though there are two areas classified MRZ-3.[58] As noted above, MRZ-1 areas contain adequate geologic information indicating no significant mineral deposits, and the information for MRZ-4 areas is inadequate to assign the area to any of the other MRZs. For the two areas of the town with MRZ-3 classification, though there may be some suitable mineral resource material, these areas lack data on rock quality, distribution, or

[58] The original mineral resource area classification effort in the 1980s did not break down MRZ-3 into the two separate subclassifications, and subsequent redesignation does not occur unless they are re-evaluated.

overburden thickness or other test data. Therefore, because none of the proposed Project sites are located in an area with known mineral deposits, there would be no impact related to the loss of availability of a known mineral resource that would be of value to the region and the residents of the state as a result of the Project.

6.1.3 References

California Department of Conservation, California Geological Survey, CGS Information Warehouse: Mineral Land Classification. Accessed on July 19, 2023 at: https://maps.conservation.ca.gov/cgs/informationwarehouse/.

California Department of Conservation. California Important Farmland Finder. Accessed on July 18, 2022 at: https://maps.conservation.ca.gov/DLRP/CIFF/.

California Department of Conservation, SMARA Mineral Land Classification, "Guidelines for Classification and Designation of Mineral Lands." Accessed on July 24, 2023 at: https://www.conservation.ca.gov/cgs/minerals/mineral-land-classification-smara.

California Department of Conservation, "Special Report 146: Part II, Mineral Land Classification: Aggregate Materials in the San FranciscoMonterey Bay Area: Classification of Aggregate Resource Areas: South San Francisco Bay Production-Consumption Region," 1987; and Plates 2.29 and 2.43.

Open San Mateo Open, "Open San Mateo County, Lands associated with the Williamson Act." Accessed on July 19, 2023 at: https://data.smcgov.org/Environment/Lands-associated-with-the-Williamson-Act/883b-b5g8.

6.2 Cumulative Impacts

Section 15130(a) of the CEQA Guidelines requires that the EIR "discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable...." The CEQA Guidelines (Section 15355) define "cumulative impacts" as "...two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts."

The quantitative cumulative growth recognized in this EIR is (1) the regional growth embedded in the City/County Association of Governments of San Mateo County-Santa Clara County Valley Transportation Authority (C/CAG-VTA) Countywide Model. The model is based on the transportation network assumptions from Plan Bay Area 2040 (the Bay Area's Regional Transportation Plan/Sustainable Communities Strategy) and the corresponding population, housing and employment forecasts developed by ABAG, plus (2) the development capacity assumptions for the Project. Item 1, the C/CAG-VTA) Countywide Model which is consistent with the MTC regional model and with land use and demographic data published by the Association of Bay Area Governments (ABAG), is the most reliable source of quantitative data because it is based on a 2040 land use forecast for the Regional Transportation Plan & Sustainable Communities Strategy. Development capacity assumption for the Project is described in Chapter 3 (Project Description). In addition, development projections based on state-mandated RHNA numbers for the entire county total 47,687 units for 2023-2031.

The analyses of quantitative cumulative impacts in this EIR are based on the "summary of projections" method, as authorized by Section 15130(b)(1)(B) of the State CEQA Guidelines.

Table 6.2-1 indicates the current RHNA requirements for San Mateo County.

Table 6.2-1: San Mateo County RHNA

San Mateo County	Very-Low Income (<50% of Area Median Income)	Low-Income (50-80% of Area Median Income)	Moderate Income (80-120% of Area Median Income)	Above Moderate Income (>120% of Area Median Income)	Total
Atherton	94	54	56	144	348
Belmont	488	281	283	733	1,785
Brisbane	317	183	303	785	1,588
Burlingame	863	497	529	1,368	3,257
Colma	44	25	37	96	202
Daly City	1,336	769	762	1,971	4,838
East Palo Alto	165	95	159	410	829
Foster City	520	299	300	777	1,896
Half Moon Bay	181	104	54	141	480
Hillsborough	155	89	87	223	554
Menlo Park	740	426	496	1,284	2,946
Millbrae	575	331	361	932	2,199
Pacifica	538	310	291	753	1,892
Portola Valley	73	42	39	99	253
Redwood City	1,115	643	789	2,041	4,588
San Bruno	704	405	573	1,483	3,165
San Carlos	739	425	438	1,133	2,735
San Mateo	1,777	1,023	1,175	3,040	7,015
South San Francisco	871	502	720	1,863	3,956
Unincorporated San Mateo	811	468	433	1,121	2,833
Woodside	90	52	52	134	328
Total	**12,196**	**7,023**	**7,937**	**20,531**	**47,687**

Source: Association of Bay Area Governments, Regional Housing Needs (RHNA) Allocation Plan: San Francisco Bay Area 2023-2031; Adopted December 2021, Updated November 2022.

The proposed Hillsborough Focused GPU is itself a cumulative project because it would be implemented across the entire Planning Area incrementally and cumulatively over the approximately eight-year time horizon of the proposed 6th cycle Housing Element. This Program EIR evaluates all Project actions as one "project" in accordance with CEQA. All potentially significant cumulative impacts are addressed in this chapter with the following exceptions:

A. The project would have no impacts in the following two environmental topical areas: Agriculture and Forest Resources; and Mineral Resources. See Section 6.1 (Impacts found Less than Significant), above. Therefore, these topics are not further evaluated in the DEIR and cumulative impacts for these resources are considered less than significant.

B. The BAAQMD identifies all regional air pollutant emission impacts and climate change impacts as inherently cumulative impacts because they contribute to regional and global conditions, and are not confined to physical boundaries. Accordingly, the analyses of these impacts in Chapters 4.2 (Air Quality), 4.6 (Energy) and 4.7 (Greenhouse Gas Emissions and Global Climate Change) are analyses of cumulative impacts.

C. Cumulative noise impacts are analyzed in detail in Chapter 4.11 (Noise).

D. Cumulative transportation impacts are analyzed in detail in Chapter 4.14 (Transportation).

All other potential cumulative impacts are addressed in the sections that follow below.

6.2.1 Aesthetics

Scenic Vistas

A cumulative impact to scenic vistas would occur if housing projects within the Planning Area, combined with other projects in the surrounding area, resulted in the substantial degradation of quality or obstruction of particularly scenic views available from a recognized scenic vista. Project specific impacts with respect to scenic vistas were determined to be less than significant. Since the Planning Area is almost entirely urbanized, incremental changes that would occur from implementation of the proposed Focused GPU would not result in cumulative impacts with respect to scenic vistas. Thus, the Project's contribution to potential cumulative impacts to scenic vistas would be ***less than significant***.

Scenic Highways

Most new housing would not be visible from I-280, which is a designated State scenic highway. The only housing development that may be visible from I-280 would be ADUs. Views of the Nueva School Opportunity Site would be adequately screened from view, as described in Impact AES-2. Housing development proposed by the Project would not result in impacts to scenic resources within a State scenic highway. Therefore, the Project would not contribute to a potential cumulative significant impact to scenic resources within a scenic highway. Thus, the Project's contribution to potential cumulative impacts would be ***less than significant***.

Degrade Visual Character

Construction and habitation of future housing development within the Planning Area would result in less than significant impacts to the existing visual character and quality of the Planning Area and to the surrounding area with mitigation incorporated. Future housing projects, as well as other development allowed under the 2005 General Plan considered in the cumulative scenario would generally be subject to the Town's underlying zoning standards that include regulations pertaining to permitted uses, minimum lot dimensions, and maximum building height. The proposed Focused GPU includes Zoning Ordinance revisions related to setbacks, FAR, parking, landscaping, and open space, among other provisions.

Future residential development projects within the Planning Area would be located where similar existing uses occur and, as such, would not entail a significant visual change such that the existing visual character or quality of project sites and their surroundings would be substantially degraded. However, as described under Impact AES-3, the buildout of the Tobin Clark Opportunity Site could result in potentially significant aesthetic impacts that require mitigation. The Project will require the Town to revise the Municipal Code, including design review criteria, and the General Plan to include Objective Design Standards for multi-family residential buildings through Mitigation Measure AES-1 (see Impact AES-3).

However, while the Town has initiated a planning effort to develop these Objective Design Standards, they have not yet been developed and it cannot be guaranteed if and when the Objective Design Standards would be adopted. Additionally, it is unknown at this time whether the Objective Design Standards would reduce the visual impacts of multi-family development on the Tobin Clark site to less than significant. Therefore, the potential development of the Tobin Clark Opportunity Site would make the Project's potential contribution to cumulative aesthetics impacts ***significant and unavoidable***.

Light and Glare

Project related impacts with respect to light and glare were determined to be less than significant. Lighting and building materials associated with cumulative housing development would be subject to Municipal Code Section 2.12.070 and the Town's Residential Design Guidelines, which require exterior lighting to be directed away from the street, the sky or neighboring parcels and designed to subtly highlight key features of the landscape design, such as walkways or paths, and augment architectural features of the residence. If detailed information regarding proposed lighting and building materials are not known during preparation of necessary environmental documentation for cumulative projects, then the adoption of applicant-proposed measures or mitigation measures would likely be required by the Town to ensure that lighting and glare impacts are less than significant. Further, the Town's new Objective Design Standards will contain standards for lighting and window glass to reduce glare in multi-family residential buildings. Therefore, cumulative lighting and glare impacts would be ***less than significant***.

6.2.2 Air Quality

The Project would make a *cumulatively considerable contribution to significant cumulative impacts* with respect to Impact AIR-1, "conflicts with the local air quality plan and result in a

cumulatively considerable net increase in criteria pollutants for which the region is non-attainment" and Impact AIR-2, "result in a cumulatively considerable net increase in criteria pollutants for which the region is non-attainment." These impacts would be ***significant and unavoidable***.[59]

6.2.3 Biological Resources

Future development of candidate housing sites, 400 ADU sites, and implementation of projects that would be facilitated by adoption of the Draft 2023 – 2031 Housing Element, in conjunction with other types of private development and public projects occurring in the Town, could potentially result in cumulative impacts to biological resources (special-status species and their habitats, sensitive natural communities, wetlands, wildlife movement corridors, and wildlife nursery sites).

Development of candidate housing sites facilitated by adoption of the Draft 2023 – 2031 Housing Element would increase housing development and human presence in developed and undeveloped areas and could result in cumulative impacts to sensitive biological resources, for example through loss of vegetation, alteration of creeks and drainages, and disruption of wildlife movement corridors. Implementation of Housing Element programs that result in ground or vegetation disturbing activities or construction/rehabilitation of public or private infrastructure could also contribute to cumulative impacts to sensitive biological resources. Potential development impacts on sensitive biological resources would be avoided or minimized through adopted 2005 General Plan policies and implementation of Mitigation Measures BIO-1 through BIO-4. Additionally, housing development and all Housing Element related projects are subject to federal, State, regional, and local regulations protecting biological resources. These protections encourage site development to avoid impacting sensitive resources through project design, such as by clustering housing and protecting sensitive habitat with conservation easements.

Development of candidate housing sites and Housing Element projects that have the potential to impact biological resources would also require biological evaluation on a case-by-case basis at the project level when future projects are proposed, and each project requiring discretionary approvals would require evaluation under CEQA to determine if the analysis and measures in this Program EIR address the potential impacts to biological resources, or if additional review is necessary. The CEQA analysis would further evaluate the potential impacts on biological resources and would analyze the project's contribution towards cumulative impacts on sensitive biological resources.

Projects that have potential impacts would be evaluated for consistency with Town ordinances and General Plan Policies. Through environmental review, implementation of existing and new implementing programs, consistency with existing and new policies and ordinances, mitigation measures herein (Mitigation Measures BIO-1 through BIO-4), and compliance with regulatory requirements, the Draft 2023 – 2031 Housing Element contribution to cumulatively considerable impacts on biological resources would be ***less than significant with mitigation***.

[59]The BAAQMD CEQA Guidelines explain that all regional air pollutant emission impacts are inherently cumulative impacts because they contribute to regional and global conditions, and are not confined to physical boundaries (see detailed discussion in Chapter 6, Air Quality).

6.2.4 Cultural Resources and Tribal Cultural Resources

Investigations for historic resources and Native American tribal cultural and archaeological resources and sites in the built environment are not comprehensive for the Planning Area. The locations of buried resources are entirely unknown as they have yet to be identified since they are typically only uncovered during earth-moving activities. Therefore, cumulative impacts to cultural, historic, or tribal cultural resource sites or resources are difficult to quantify and assess.

Cumulative impacts would occur when a series of actions leads to the loss of a substantial type of site, building, or resource. For example, while the loss of a single historic building may not be significant to the character of a neighborhood or streetscape, continued loss of such resources on a project-by-project basis could constitute a significant cumulative effect. This is most obvious in historic districts, where destruction or alteration of a percentage of the contributing elements may lead to a loss of integrity for the district overall. Changes to the setting or atmosphere of an area, for example, by adding modern structures on all sides of a historically significant building results in an altered streetscape and would create a significant impact. Destruction or relocation of historic buildings would also significantly impact the setting.

Individual residential project impacts with respect to archaeological and tribal cultural resources would be site-specific and would not be expected to combine with the impacts of other projects throughout the Planning Area.

Development in areas within the Planning Area would be subject to federal and State laws protecting cultural and tribal cultural resources. The goals and polices of the Open Space and Conservation Element protecting historic architectural resources and archaeological resources, as well as Mitigation Measure CUL-1 for the protection of human remains and mitigation in subsequent analyses to address site-specific conditions and records for known resources, would result in ***less than significant*** cumulative impacts to cultural, and tribal cultural resources. The proposed Project has a significant and unavoidable impact on historic resources and would thus also have a cumulative ***significant and unavoidable*** impact on historic resources.

6.2.5 Energy

The analysis presented under Impacts ENG-1 and ENG-2 is cumulative in nature. As described in the analyses, the Focused GPU would result in a potentially significant impact regarding the use of energy in an unnecessary, inefficient, or wasteful manner. Mitigation Measures ENG-1a and ENG-1b have been incorporated into the Project to reduce Impact ENG-1 to less than significant. The proposed Project would not conflict with or obstruct a state or local plan for increasing renewable energy or energy efficiency and therefore result in a ***less-than-significant impact*** for Impact ENG-2.

6.2.6 Geology and Soils

The Town of Hillsborough is located in a seismically active region of the state and within relative proximity to several major faults. An individual project's impacts with respect to geology and soils would be site-specific and would not combine with the equally site-specific geology or soils impacts of other projects throughout the Planning Area and the surrounding jurisdictions. The

magnitude of potential geologic and seismic hazards would be dependent on the site-specific conditions present at each location. Regardless of the potential risk, any future projects within the Planning Area would be required to implement design and construction practices intended to reduce and or avoid site-specific geologic and soils risks (either through compliance with General Plan policies and the local building code, or through the implementation of site-specific mitigation measures developed as a result of required site investigations). The proposed Project does not allow any specific future development to occur. Mitigation in subsequent analyses to address site-specific geological conditions and site soils would render the site-specific risks posed by local and regional hazards such as ground shaking, liquefaction, and other soils and geologic-related conditions less than significant for each project and would prevent significant cumulative impacts from occurring. The cumulative impacts of the Project would be less than significant.

Although the Project, in combination with other future cumulative development, could increase potential paleontological resource impacts, development projects within the Planning Area would be required to implement Mitigation Measure GEO-2, which would reduce potential impacts to paleontological resources and comply with the same federal and State regulations as described in Section 4.6.2 regarding paleontological resources. Development projects within the Planning Area would also be required to comply with General Plan Action OSC-5.3.

Therefore, future potential development facilitated by the Project would not make a cumulatively considerable contribution to any significant cumulative impact with respect to geology and soils or paleontological resources. This impact would be ***less than significant***.

6.2.7 Greenhouse Gases

Global climate change is the result of GHG emissions worldwide; individual projects do not generate enough GHG emissions to influence global climate change. Thus, the analysis of GHG emissions is by nature a cumulative analysis focused on whether an individual project's contribution to global climate change is cumulatively considerable. As described in Chapter 4.7 Greenhouse Gases, under Impact GHG-1, the proposed Draft 2023 – 2031 Housing Element would result in GHG emissions that do not meet the State's 2030 GHG reduction or 2045 carbon neutrality goals. The implementation of the Housing Element could also result in GHG emissions that conflict with plans adopted for the purposes of reducing GHG emission, including the 2022 Scoping Plan and Plan Bay Area 2050. The EIR recommends implementation of Mitigation Measures GHG-1a through GHG-1e; however, even with these mitigation measures, this impact would be ***significant and unavoidable***.

6.2.8 Hazards and Hazardous Materials

Impacts related to hazards and hazardous materials are generally site-specific and not cumulative in nature because each project site has unique considerations that would be subject to uniform site development and construction standards. As such, the potential for cumulative impacts is reduced. Potential Project impacts related to discovery of undocumented hazardous conditions (contaminated soils and/or groundwater) would be mitigated on a site-specific basis (EIR Mitigation Measure HAZ-1) and would not make a cumulatively considerable contribution to any significant cumulative hazardous materials impact. Future development facilitated by the Project would be subject to existing and proposed General Plan policies, Zoning Code

requirements, and federal, State, and county regulations ensuring that hazards and hazardous materials are managed appropriately. Additionally, any new project outside the Planning Area would also be required to comply with applicable laws, standards, and protocols, so no significant cumulative impact is anticipated. Therefore, Project cumulative impacts related to hazards and hazardous materials would be considered ***less than significant***.

6.2.9 Hydrology and Water Quality

The watershed is used as the geographic unit for cumulative hydrology and water quality analysis based on the concept that many water quality problems, like the accumulation of pollutants or nonpoint source pollution, are best addressed at the watershed level. In addition, California's regulatory framework for protection of water quality focuses on the watershed.

Future projects within the watershed would incorporate BMPs, LID, retention, and treatment measures per NPDES requirements to control and/or treat stormwater runoff during construction and operation to prevent significant erosion, siltation, flooding, and other sources of pollution. As such, the cumulative impact of the Project related to surface water quality would be ***less than significant*.**

Because it cannot be guaranteed at this time that the forthcoming goals, policies, and/or actions required to implement Mitigation Measure HYD-1 would reduce the effects of future residential development facilitated by the Project related to flooding and pollutant release to less than significant levels, this impact would be significant and unavoidable. Therefore, the Project's cumulative impacts related to impeding or redirecting flood flows would also be ***significant and unavoidable*.**

Hillsborough does not utilize groundwater for potable water supplies; therefore, future development associated with the Project would have no effect on groundwater supplies. Therefore, the Project's cumulative groundwater supply, groundwater recharge, and groundwater quality impacts would be ***less than significant*.**

6.2.10 Land Use

As described in Chapter 4.10 Land Use, implementation of the Project would not result in a significant land use impact by physically dividing an established community; therefore, the Project would not make a cumulatively considerable contribution to an environmental impact related to physically dividing an established community.

The Project would be consistent with applicable land use plans and policies adopted for the purpose of avoiding or reducing an adverse environmental effect. The Town would continue to review future development proposals to ensure compliance with the Town's environmental policies and utilize its discretion to disapprove projects and/or general plan amendments that would cause significant cumulative impacts to the environment. However, no such conflicts, including those with Plan Bay Area 2050, have been identified for the Project. Implementation of the Project would not make a cumulatively considerable contribution to conflicts with land use plans and policies adopted for the purpose of avoiding or reducing an adverse environmental effect. This potential impact would be ***less than significant***.

6.2.11 Noise

For purposes of this cumulative noise and vibration analysis, the geographic context is limited to the extent of potential noise impacts caused by the proposed Project that could combine with other relevant cumulative developments. Although construction and stationary source noise may theoretically be audible far from the source, in practice ambient noise from wind, roadway traffic, and other land uses is substantially louder than equipment operating hundreds or thousands of feet away. Therefore, the geographic context is limited to the area within approximately 1,000 feet of individual Housing Opportunity Sites and the roadways used to travel to and from these sites.

The Project could result in construction noise and vibration as individual development projects are constructed over time (Impacts NOI-1 and NOI-3). Construction noise and vibration from the development of Housing Opportunity Sites could combine with other construction projects (within 1,000 feet of the Housing Opportunity Site). Each development project would be subject to General Plan policies and Municipal Code regulations regarding construction noise and vibration (see Section 4.11.3) that would protect existing and future residents from potential substantial, temporary increases in ambient noise levels associated with construction activities. For these reasons, the proposed Project would not make a cumulatively considerable contribution to cumulative construction noise or vibration impacts at on- or off-site receptor locations near Housing Opportunity Sites.

The Project would result in long term increases in vehicle trips and traffic-related noise levels, as well as stationary and other operational noise activities and sources (Impact NOI-2). The Project's vehicle trips would not substantially change existing or future without Project traffic noises levels, and would not contribute to more than a 1 dB change in modeled traffic noise levels in areas where traffic noise levels exceed the Town's guidelines for normally unacceptable noise levels at residential land uses. The Project, therefore, would not make a cumulatively considerable contribution to existing or future traffic noise levels. In addition, the Project is not anticipated to result in land uses that involve substantial on-site noise generating sources or activities. The development of Housing Opportunity Sites as well other potential projects in the Town would be subject to General Plan policies and Municipal Code regulations regarding traffic and on-site operational noise that would protect existing and future residents from potential substantial, permanent increases in ambient noise levels associated with stationary and other noise sources. For these reasons, the proposed Project would not make a cumulatively considerable contribution to cumulative noise impacts at on- or off-site receptor locations.

The Project does not propose or support any large vibration-inducing equipment or land use activities and would not result in excessive groundborne vibration levels that have the potential to combine with vibration levels from other projects within or outside of the Planning Area (Impact NOI-3). No cumulative operational vibration impact would occur.

The Project would not expose people residing or working at Housing Opportunity Sites to excessive airport-related noise levels (Impact NOI-4). This impact is Project-specific and would not combine with any other project. There would be ***no cumulative impact***.

6.2.12 Population and Housing

The proposed Draft 2023 – 2031 Housing Element would not result in substantial unplanned population growth or the displacement of housing units, requiring the construction of replacement housing. The potential growth in housing, and related population, identified in the proposed Project would be consistent with the City's RHNA and *Plan Bay Area 2050* population projections. Other planning jurisdictions in the Bay Area are currently updating their housing elements to identify available sites to accommodate their designated RHNA share, as jurisdictions must accommodate more than 441,000 new housing units to meet the RHNA for the region during the 2023-2031 planning period. Other housing elements must also prepare for the population growth projected for the region and the associated need for new housing to accommodate that growth. As with the Town of Hillsborough Housing Element Update, the growth accommodated by the housing elements of other jurisdictions would be planned growth, not unplanned growth; implementation of the project would not result in a significant cumulative impact.

Implementation of the proposed Project would result in a net increase in housing. Thus, the Project would not make a cumulatively considerable contribution to a regional impact related to a substantial displacement of housing or people. This cumulative impact would be considered ***less than significant***.

6.2.13 Public Services and Recreation

Housing development that is facilitated by the Project, in combination with other cumulative development in the Planning Area, would increase the demand for all public services. Public services can be potentially impacted by increased population, especially when new infrastructure is not built to meet population increases or when existing facilities are not adequately maintained. Alternatively, impacts may also occur when new facilities are built, resulting in physical impacts to the environment. The General Plan contains policies and actions addressing levels of services, and new development would be required to pay school impact fees to address the need for new or expanded facilities. New development would result in increased property taxes, which would assist in paying for the incremental increases in demand for public services. Further, should new public services facilities be required, environmental review would identify site-specific conditions and physical changes resulting from facility expansion.

Future regional growth would result in increased demand for park and recreational facilities throughout San Mateo County and surrounding jurisdictions. As a result, the Town of Hillsborough and other jurisdictions would need to expand and construct additional parks and other recreational facilities to meet the increased demand. State law allows jurisdictions to require additional development to fund park improvements, which would ensure the provision of adequate parklands. However, the location and size of additional facilities would be determined as part of future development activity. As specific parkland expansion or improvement projects are identified, additional project-specific, environmental analysis would be completed.

The Project's cumulative impact related to public services and recreation would be ***less than significant***.

6.2.14 Transportation

The proposed Housing Element's VMT significance was determined by comparing Existing plus Project conditions to countywide VMT significance thresholds based on a VMT per capita performance metric, as presented in Chapter 4.14. As the OPR Technical Advisory states, "A project that falls below an efficiency-based threshold that is aligned with long-term environmental goals and relevant plans would have no cumulative impact distinct from the project impact." While not used in this analysis for the purposes of establishing impact significance, the Cumulative 2040 plus Project VMT per capita associated with the 605 (RHNA + buffer) units in all candidate sites was projected using the C/CAG-VTA model. The results indicate that the 2040 plus Project residential VMT per capita in the Town would be 20.7 miles, which is lower than the 2020 plus Project level of 21.4 miles. This suggests that residential VMT per capita in Hillsborough is anticipated to trend favorably and decrease over time. It would, however, remain well above the countywide significance threshold of 13.2 VMT per capita. This would be a significant cumulative impact.

The San Mateo countywide VMT per capita under Existing conditions (2020) is 15.5 miles. The VMT Significance Threshold used in this EIR is 15% below the San Mateo countywide Existing VMT per capita or 13.2 VMT per capita. The Existing plus Project VMT per capita is estimated to be 21.4 miles, which is 62 percent above the countywide threshold. Therefore, the impact of the proposed Housing Element with respect to VMT is significant and requires mitigation. Chapter 4.14 recommends Mitigation Measure TRANS-1 to reduce project-level VMT. However, given the uncertainty in achieving enough of a reduction in VMT that it would fall below the Significance Threshold, the impact is still considered ***significant and unavoidable***.

6.2.15 Utilities and Service Systems

Residential development facilitated by the proposed Project, in combination with other cumulative development in San Mateo County and its constituent cities, could increase the demand for utilities due to population increases. New or expanded utility infrastructure and facilities may result in physical impacts to existing resources. For Hillsborough, as with other jurisdictions, General Plan policies mitigating potential adverse environmental effects for new utility infrastructure would be anticipated to reduce impacts, and any projects requiring CEQA review would have site-specific mitigation measures. Typically, impacts associated with new or expanded utilities infrastructure include short-term construction effects related to air quality pollutant emissions, biological resources, stormwater runoff, temporary traffic detours, and noise.

As discussed in Chapter 4.15 Utilities and Service Systems, storm drain and wastewater facilities are included in multi-year Town-wide capital improvement programs and implemented based on Public Works Department prioritization. Similarly, the Town's water supply is well-developed and maintained on a regular basis. Impacts related to new or expanded infrastructure necessary to meet Project needs for water supply and wastewater and stormwater collection and conveyance would generally be less-than-significant due to construction-period mitigation measures identified in this EIR (e.g., air quality, biological resources, traffic, noise). These utility infrastructure impacts would be project-specific and localized; they would not contribute substantially to a cumulative impact. This cumulative impact would be ***less than significant with mitigation***.

With respect to future water supplies, the Town's Urban Water Management Plan (UWMP) indicates that future Town water demands, including buildout facilitated by the Project, would be within the Town's independent supply guarantee (ISG) from the San Francisco Public Utilities Commission (SFPUC), the water supplier, during normal years. Buildout facilitated by the Project would have an anticipated water demand in 2040 that is less than the Town's ISG (2040 Hillsborough ISG = 4,585 acre-feet; 2040 Town water demand = 3,669 acre-feet). For dry years, the UWMP includes a Water Shortage Contingency Plan (WSCP) to address potential water shortage conditions, consistent with the SFPUC water shortage contingency plans. Depending on the extent of a future water shortage, the Town would implement one of the stages identified in the WSCP, among other actions, to reduce demand and conserve water. Although Project demands on water supplies could contribute to a cumulative regionwide water supply impact, the Project's contribution would not be substantial and therefore the cumulative impacts of the Project would be ***less than significant***.

With respect to wastewater treatment, the Burlingame Wastewater Treatment Plant (WWTP) and the San Mateo WWTP serve other jurisdictions in addition to the Town of Hillsborough. It is possible that incremental increases in demand, as anticipated under the Project, in conjunction with increased demand from other communities could eventually result in the need for future new or expanded wastewater treatment facilities. However, the San Mateo WTTP is in the process of a planned expansion program. The Burlingame WTTP, on the other hand, does not have the resources to expand its WTTP (principally it lacks available land). Therefore, it is possible that future Town contributions to wastewater treatment could make a contribution to a cumulative wastewater impact, however, the Project's contribution would not be substantial, and therefore the cumulative impacts of the Project would be ***less than significant***.

The geographic scope for cumulative electricity and natural gas impacts is the PG&E service area, which includes the Planning Area. PG&E is subject to the requirements set forth and/or enforced by the California Public Utilities Commission (CPUC). The need for electric and natural gas infrastructure would be addressed on a case-by-case basis for each cumulative project, and would be subject to CPUC requirements. Therefore, cumulative impacts related to electric power and natural gas transmission facilities would be ***less than significant***.

All development projects in Hillsborough are required to be consistent with adopted solid waste and recycling regulations and programs, including those described in Chapter 4.15 Utilities and Service Systems. The solid waste disposal and recycling facilities used by the Town have sufficient capacity, and the applicable regulations and programs have been deliberately designed and adopted to avoid or reduce cumulative solid waste/recycling impacts to less-than-significant levels. The overall cumulative solid waste/recycling impact of cumulative development would be ***less than significant***.

No cumulatively considerable Project contributions to significant cumulative impacts have been identified; therefore, this impact would be ***less than significant***.

6.2.16 Wildfire

The proposed Project could have a cumulative impact on the ability of local agencies to protect residents, workers, and structures from wildfires. Future residential development facilitated by the Housing Element Update could increase the population and/or increase activities and

ignition sources and thereby increase the chances of a wildfire and the number of people and structures exposed to risk of loss, injury, or death. The potential cumulative impacts from individual projects in a specific area can also cause a decline in fire service response and must be analyzed for each project.

The existing General Plan and proposed Housing Action Plan contain policies and actions that would help protect residents and structures from wildfires, as described under Impacts WILD-1 through WILD-5. These policies and actions promote public education and awareness prior to fires, require fire-resistant design and construction of buildings within the WUI, support collaboration with CCFD, and help protect downhill properties from potential landslides, runoff, or pollution associated with wildfires. The continued implementation of CCFD's Hillsborough WUI Program would also serve to reduce wildfire risks associated with existing development in the WUI and the development of Housing Element Update Housing Opportunity Sites.

As discussed under Impact WILD-1, development of any of the Housing Opportunity Sites, except the Tobin Clark Opportunity Site, alone would not likely exacerbate existing evacuation deficiencies. However, the addition of up to 605 new housing units and approximately 12,716 new residents in the Planning Area in the next eight years would add a substantial number of new people to the Town, and many new residents would be located in the WUI where existing streets with only one point of ingress and egress are abundant and narrow, winding, steep roads can impact effective evacuation.

In addition, the State Attorney General notes new low-density development in the WUI and surrounded by open space, which applies to a number of the Project's Housing Opportunity Sites, requires a relatively more intensive level of evacuation analysis. There is currently a dearth of information, including data on streets with one point of ingress/egress and substandard roads, and evacuation modeling and analysis that would evaluate the capacity of roadways to accommodate evacuation and simultaneous emergency access and estimated evacuation times based on traffic modeling under likely scenarios, all of which is necessary to properly assess the potential cumulative evacuation impacts of the Project, as stated in the State Attorney General's Best Practices for Analyzing and Mitigating Wildfire Impacts of Development Projects Under the California Environmental Quality Act.

While the implementation of Mitigation Measure WILD-1 would mitigate the potential cumulative evacuation impacts of the Project to a certain extent by improving the General Plan policies and actions and the standards applicable to future residential development facilitated by the proposed Project, in the absence of evacuation modeling and analyses and specific site development plans that would better lay out the potential impacts of the development of the Housing Element Update Housing Opportunity Sites, there is currently not enough information available to conclude mitigation would reduce the significance of evacuation impacts of the Tobin Clark site to less than significant. Therefore, the Project's cumulative evacuation impact would be ***significant and unavoidable*.**

6.2.17 References

Town of Hillsborough. Hillsborough General Plan. March 14, 2005.

ABAG. Final Regional Housing Needs Allocation Plan: San Francisco Bay Area, 2023-2031 (Adopted December 2021, Updated November 2022). Accessed on August 24 2023 at: https://abag.ca.gov/sites/default/files/documents/2022-12/Final%20RHNA%20Methodology%20Report%202023-2031_update_11-22.pdf.

6.3 Growth Inducement

CEQA Guidelines Section 15126.2(d) requires that the EIR discuss "...the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment."

The Focused GPU would result in an allowable increase of up to 554 additional dwelling units. An estimated population increase of approximately 11 percent (approximately 1,274 residents) is projected for the 2040 horizon year (from 2020). However, no substantial, detrimental, growth-inducing effect is expected. The goals, policies, and actions in the Focused GPU are designed to provide the framework for this future growth, one of the primary goals of which is to meet identified housing needs in the Town. No other future potential development is being contemplated in the Focused GPU. It is purposely designed to meet the Town's RHNA.

State law requires the Town to promote the production of housing to meet its fair share of the regional housing needs distribution made by ABAG. The housing and employment growth in Hillsborough would generally have beneficial effects by allowing the Town to address its regional fair-share housing obligations.

The goals, policies, and actions contained in the proposed Focused GPU address the potentially negative aspects of growth and have been designed to facilitate development efficiently and effectively in an area where roads and infrastructure already exist. The potential growth-related impacts associated with the Focused GPU have also been evaluated in the topical chapters of this EIR (Aesthetics, Biological Resources, etc.) and, as appropriate, mitigation measures have been applied to address such impacts.

6.3.1 Indirect Impacts

New residential development in the Town would consist of housing development located on remaining vacant sites or redevelopment of an already developed site (the Town Hall site). Since the infrastructure is largely in place, and since this residential growth would be required to comply with the Town's standards for public services and utilities, secondary growth-inducing effects would not represent a significant environmental impact. Implementation of the proposed Focused GPU would not involve the extension of roads to undeveloped areas, major sewer or water lines, or the construction of other major infrastructure facilities that would induce growth in areas adjoining Hillsborough. Road work (including any extension or other modification) and infrastructure would be designed to facilitate the development envisioned in the Focused GPU, would be of a scale commensurate to the needs of the new development, and would not be "oversized" in a way that would lead to substantial indirect growth.

6.3.2 References

Town of Hillsborough. Hillsborough General Plan. March 14, 2005.

6.4 Significant Unavoidable Impacts

CEQA Guidelines Section 15126.2(c) requires that the EIR discuss "significant environmental effects which cannot be avoided if the proposed project is implemented." As described in the environmental analyses contained in Section 4.1 through 4.16 of this EIR, most of the potentially significant impacts would be reduced to a less than significant level with mitigation. However, there are Aesthetic, Air Quality, Greenhouse Gases, Hydrology, Historic Resources, Transportation, and Utilities and Service Systems impacts, listed below, that are considered significant and unavoidable impacts as the proposed mitigation is not able to reduce the impacts to less than significant levels. These significant and unavoidable impacts are:

Impact AES-1: Development of the Tobin Clark Housing Opportunity Site could result in potentially significant visual impacts due to the construction of new multi-family residential buildings along a prominent, currently vacant ridgeline that provides scenic value. Mitigation Measure AES-1 is recommended to address the potentially significant aesthetics impacts of the Tobin Clark Housing Opportunity Site through the development of multi-family Objective Design Standards. Although the multi-family housing Objective Design Standards required under Mitigation Measure AES-1 would likely be adopted by the time a development application is submitted for the Tobin Clark site, it is currently unknown if the new Objective Design Standards would be sufficient to fully mitigate the visual impacts of development on that visually prominent site to a less than significant level. Therefore, the aesthetics impact of the potential development of the Tobin Clark site, even with Mitigation Measure AES-1, would be significant and unavoidable impact. (***Significant and Unavoidable Impact***)

Impact AIR-1 –The proposed Project would be inconsistent with one of the control measures identified in the 2017 Clean Air Plan related to VMT from land use planning. Although the growth in trips and VMT attributable to the Project would be less than the increase in population growth, the Project could still obstruct implementation of the 2017 Clean Air Plan due to control measure inconsistency. Due to this, the Project has the potential to generate a cumulatively considerable net increase in criteria air pollutant emissions for which the region is non-attainment, including ozone precursors, PM2.5, and PM10, pursuant to BAAQMD plan-level assessment criteria. Mitigation Measure AIR-1 would help to reduce VMT generated by the additional residential units proposed by Draft 2023 – 2031 Housing Element; however, it would not be enough to reduce this impact to less than significant, as the 2017 Clean Air Plan control measure the Project is inconsistent with is directly related to land use planning. This impact would be significant and unavoidable despite the implementation of mitigation. (***Significant and Unavoidable Impact***)

Cumulative Air Quality Impact – The SFBAAB is designated nonattainment for national and State O3 standards, national and State PM2.5 standards, and national PM10 standards. The analysis of potential air quality impacts described above indicates the Project would conflict with the 2017 Clean Air Plan and result in a significant and unavoidable impact to regional air quality (from O3 precursor emissions, PM2.5, and PM10). Impact AIR-1's analysis is cumulative in nature. Therefore, this impact would also be cumulatively

significant and unavoidable. The Project would implement Mitigation Measure AIR-1 to reduce VMT; however, the nexus of the impact is related to land use density and location. This impact would remain significant and unavoidable despite the implementation of Mitigation Measure AIR-1. **(*Significant and Unavoidable Impact*)**

Impact CUL-1: Future development projects that may be facilitated by the Focused GPU may cause substantial adverse changes in the significance of a historic resource, including properties or features eligible for listing in a local, State, or federal register of historic resources. This is considered a potentially significant impact. Implementation of Mitigation Measures CUL-1 would generally reduce impacts to a less than significant level. However, without knowing the characteristics of the potentially affected historic resource or of the future development proposal, it cannot be guaranteed with certainty that the measures within CUL-1 would fully mitigate impacts to a potentially historic resource. Therefore, the Focused GPU's potential impacts to historic resources would remain significant and unavoidable. **(*Significant and Unavoidable Impact*)**

Impact GHG-1 –Implementation of the proposed Focused GPU could result in construction and operational activities that generate GHG emissions. The GHG emissions that could be generated by the increase in housing facilitated by the Project would not be consistent with BAAMD-recommended CEQA thresholds of significance and the CARB Scoping Plan. Mitigation Measures GHG-1a through GHG-1e are intended to reduce GHG emissions from transportation and building energy use, which are two of the largest sources of potential GHG emissions associated with the additional land uses contained in the proposed Project. While it is anticipated that the Town would be able to identify a new / revised strategy for addressing the GHG emissions associated with residential growth facilitated by the Project (see Mitigation Measure GHG-1A) and align the Town's emissions with state-wide and local targets for 2030 and 2045, it cannot be definitively known or stated at this time that such policy considerations would be able to achieve the intended targets. Additional consideration would likely need to be given to expand carbon sequestration efforts as a means to offset increases in GHG emissions associated with the growth proposed by the Project. Since the GHG emissions associated with the implementation of the Draft 2023 – 2031 Housing Element would not meet State GHG reduction goals and could conflict with plans adopted for the purposes of reducing GHG emissions (e.g., 2022 Scoping Plan), and since the GHG reductions attributable to Mitigation Measures GHG-1a to GHG-1e cannot be definitively assessed at this time, this impact would be significant and unavoidable. **(*Significant and Unavoidable Impact*)**

Cumulative GHG Impact: The proposed 2023 – 2031 Housing Element would result in GHG emissions that do not meet the State's 2030 GHG reduction or 2045 carbon neutrality goals. The implementation of the Draft 2023 – 2031Housing Element could also result in GHG emissions that conflict with plans adopted for the purposes of reducing GHG emission, including the 2022 Scoping Plan and Plan Bay Area 2050. Even with mitigation, this cumulative impact would be significant and unavoidable. **(*Significant and Unavoidable Impact*)**

Impact HYD-1: Development of the Draft 2023-2031 Housing Element Housing Opportunity Sites could have potentially significant flooding-related impacts, particularly considering the existing General Plan goals, policies, and actions to which the new housing development

would be subject do not reflect recent State law requirements. Because it cannot be guaranteed at this time that the forthcoming goals, policies, and/or actions to implement HYD-1 would reduce the effects of future residential development facilitated by the Project related to flooding and pollutant release sufficiently to reduce potential effects to less than significant, this impact would be *significant and unavoidable*. **(*Significant and Unavoidable Impact*)**

Impact TRANS-2 –The Project would make a cumulatively considerable contribution to a significant cumulative impact with respect to "impacts related to vehicle miles traveled." The Project would result in an increase in vehicle miles traveled above the San Mateo countywide VMT per capita and with implementation of mitigations measure would not be able to reduce the VMT impacts associated with future development projects below the threshold. In addition, the Cumulative and Cumulative plus Project VMT (summarized in EIR Table 4.14-3) would remain well above the countywide significance threshold. Thus, the Housing Element Update would have a significant cumulative impact on VMT. **(*Significant and Unavoidable Impact*)**

Impact WILD-1: Development of Housing Opportunity Sites could have potentially significant evacuation-related impacts, particularly considering that the existing General Plan goals, policies, and actions to which the new housing development would be subject do not reflect recent State law requirements and the State Attorney General's Best Practices for Analyzing and Mitigating Wildfire Impacts of Development Projects. Although Mitigation Measure WILD-1 would reduce the potentially significant evacuation-related impacts for most of the Housing Opportunity Sites to less than significant, this would not apply to the Tobin Clark site. Because it is currently unknown exactly which routes new residents would take to evacuate the Tobin Clark development, there is the potential that the addition approximately 100 units and a substantial number of new people to the area would not be accommodated by potentially substandard roads. Without project-specific details pertaining to site access, existing evacuation conditions and deficiencies, the potential exists implementation of Mitigation Measure WILD-1 would not be sufficient to fully mitigate potential evacuation impacts for the Tobin Clark site. Therefore, potential evacuation-related impacts of development of the Tobin Clark Opportunity Site is conservatively considered significant and unavoidable. **(*Significant and Unavoidable Impact*)**

6.5 Significant Irreversible Changes

Section 15126.2(d) of the CEQA Guidelines requires a discussion of "significant irreversible environmental changes which would be caused by the proposed project should it be implemented." An example of such an irreversible commitment is the construction of highway improvements that would provide public access to previously inaccessible areas. A project would generally result in a significant irreversible impact if:

- Primary and secondary impacts would commit future generations to similar uses.
- The project would involve a large commitment of nonrenewable resources.
- The project would involve uses in which irreversible damage could result from any potential environmental accidents associated with the project.

6.5.1 Commitment of Future Generations to Similar Uses

Housing development facilitated by the Draft 2023 – 2031 Housing Element would result in the intensification of residential use and creation of some new multi-family residential areas to meet the Town's RHNA. This development would constitute a long-term commitment to intensification of residential uses.

6.5.2 Commitment of Non-Renewable Resources

CEQA Guidelines Section 15126.2(d) requires that the EIR discuss "significant irreversible environmental changes which would be caused by the proposed Project should it be implemented." Since nearly all of Hillsborough is developed and the Project would not significantly change the circulation pattern or make major changes to main infrastructure facilities, there would not be any significant irreversible physical changes caused by the Focused GPU.

Housing development allowed under the Focused GPU would irretrievably commit non-renewable resources to the construction and maintenance of buildings, utility and other public infrastructure, and roadways. These non-renewable resources would include, but would not be limited to, lumber, concrete, sand, gravel, asphalt, masonry, metals, and water. Project implementation would also irreversibly use water and solid waste landfill resources. However, residential development under the proposed Focused GPU would not involve a large commitment of those resources, considering ongoing Town conservation and recycling programs.

Buildout of the Focused GPU also represents a long-term commitment to the consumption of fossil fuels, including fuel oil, natural gas, and gasoline or diesel fuel for construction equipment. Increased energy demands would also be necessary for construction, as well as for lighting, heating, and cooling of residences and the transportation of people within, to, and from the Planning Area. Because development facilitated by the proposed Focused GPU would be required by law to comply with California Code of Regulations Title 24 (including updates over time) and adopted Town energy conservation policies, ordinances, and regulations, implementation of the Focused GPU would not be expected to use energy in a wasteful, inefficient, or unnecessary manner (also see Chapter 4.5 Energy and Chapter 4.7 Greenhouse Gases).

CHAPTER 7 LIST OF PREPARERS

MIG, INC.

Mike Campbell, Director of Environmental Planning

Barbara Beard, Senior Project Manager

Taylor Peterson, Director of Biological Analysis

Chris Dugan, Director of Air Quality, Greenhouse Gas, and Noise Services

Steve Ridone, Senior Environmental Planner

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W-TRANS, Transportation Engineering Consultants

Barry Bergman, AICP, Senior Planner

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Appendix A: Notice of Preparation
Notice of Completion
DOT Comment Letter
NAHC Comment Letter

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NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT AND NOTICE OF PUBLIC SCOPING SESSION

PROJECT TITLE: Town of Hillsborough 6th Cycle Housing Element (2023 – 2031) and Focused General Plan and Municipal Code Update Program Environmental Impact Report

PURPOSE OF THIS NOTICE: The Town of Hillsborough (Town) will be the Lead Agency and will prepare a Program Environmental Impact Report (EIR) for the proposed Hillsborough 6th Cycle Housing Element Update (2023 – 2031) and Focused General Plan and Municipal Code Update Project (Project or proposed Project). The Project, its location, and potential environmental effects are described below. This EIR is being prepared in accordance with the California Environmental Quality Act (CEQA) statue (Public Resources Code Section 21000 and following), the State of California CEQA Guidelines (California Code of Regulations, Title 14, Section 15000 and following), published court decisions interpreting CEQA, and locally adopted CEQA procedures. In accordance with CEQA Guidelines section 15082, this Notice of Preparation (NOP) is being circulated to obtain suggestions and information responsible, and/or trustee, and involved federal agencies and members of the public, including organizations and individuals, on the content and scope and content of the environmental analysis to be included in the EIR. Public agencies and members of the general public are invited to provide comments in writing. The Town is requesting input from you or your agency as to the scope and content of the environmental information relevant to your agency's or organization's statutory responsibilities or interests in connection with the proposed Project.

The Town is preparing the General Plan 6th Cycle Housing Element Update (2023-2031) as an update of the existing Housing Element of the General Plan, which dates from 2014. While the Housing Element is the focus, other elements (such as the Land Use, Circulation, Open Space and Conservation, Noise, and Public Safety Elements) may be revised to ensure General Plan consistency, as required by State law.

The subject EIR will provide an environmental assessment of the updated Housing, Land Use Circulation, Open Space and Conservation, Noise, and Public Safety Elements, as well as any updates to related implementation tools – Zoning Ordinance, Subdivision Ordinance and Objective Development Standards.

The overall purpose of the Housing Element Update is to revise the existing Housing Element to create a policy framework that will facilitate opportunities for a variety of housing types at a variety of income levels within Hillsborough to address the region's need for housing, as well as develop housing solutions to satisfy the Town's Cycle 6 housing unit Regional Housing Needs Allocation (RHNA).

PUBLIC COMMENT INVITED: You are invited to submit written comments and recommendations regarding the scope and content of the EIR that is being prepared. Comments should focus on discussing possible impacts on the physical environment, ways in which potential adverse effects might be minimized, and alternatives to the project in light of the purpose of the environmental review to provide useful and accurate information about such factors. Note that if you challenge this project proposal in court, for topics addressed in the EIR, you may be limited to raising only those issues you or someone else raised in written correspondence during the review period of the EIR or at the public meeting described in this notice. (Government Code Section 65009(b)(2).

COMMENT PERIOD: A 30-day public review period for the Notice of Preparation (NOP) shall begin on June 9, 2023, and end on July 10, 2023, at 5:00 p.m. **All written comments regarding the EIR must be received by this deadline**.

Please send written public comments to Liz Ruess, Planning Manager, Town of Hillsborough at the address shown below. Specify "Housing Element Update EIR" in the subject line. Public agencies providing comments are requested to include a contact person for the agency.

Lead Agency Contact:

Liz Ruess, Planning Manager, Town of Hillsborough,
Department of Building & Planning,
1600 Floribunda Avenue,
Hillsborough, CA 94010
Email: LRuess@HILLSBOROUGH.NET.

Throughout the Housing Element Update process, the Town will be seeking input through a variety of engagement opportunities both in-person and virtual. Please visit the project website at www.hillsborough.net/HousingElementUpdate to stay informed about the project.

PUBLIC SCOPING MEETING:

The City Council will hold the public scoping meeting on **June 21st, 2023** to provide a forum to collect oral comments from agencies and members of the public regarding the scope of content of the EIR.

The meeting will be held on Wednesday **June 21st, 2023, starting at 9:00 a.m.**

To attend the meeting in person: Council Chambers,1600 Floribunda Avenue, Hillsborough, CA 94010

To participate in the meeting via Zoom Video Conference:

Click here: Meeting Link

Visit https://zoom.us/; when prompted, enter:
Meeting ID: 872 3664 6711
Passcode: 439499

Agenda Materials: The City Council meeting agenda and materials will be posted on the Town's website at:

Hillsborough Agenda Center no later than 5:00 p.m. on Friday, June 16th.

FOR FURTHER INFORMATION: E-mail Liz Ruess at LRuess@HILLSBOROUGH.NET

Town of Hillsborough 6th Cycle Housing Element (2023 – 2031) and Focused General Plan and Municipal Code Update Program EIR

Project Description

PROJECT LOCATION: The Town of Hillsborough is located in the central-east portion of San Mateo County on the San Francisco Peninsula, approximately ten miles south of San Francisco. Hillsborough's town limit extends from Interstate 280 (I-280) on the west to the City of San Mateo on the east, the City of Burlingame to the north, and unincorporated areas of San Mateo County to the south.

Freeways and highways offer regional access to Hillsborough, including the Junipero Serra Freeway (I-280) on the west and the Bayshore Freeway (US 101) to the east and Highway 92 to the south. Two regional arteries, Skyline Boulevard (SR 35) and El Camino Real (SR 82) also provides access from the west and east, respectively.

PLANNING AREA: The Town of Hillsborough encompasses approximately 6.1 square miles, and is almost entirely built-out. Hillsborough's current sphere of influence (Planning Area) boundary does not extend outside the Town limits. The Town's Planning Area consists of 3,928 acres (Figure 1 – Town Limits and Planning Area).

EXISTING LAND USES: Residential land uses, consisting mainly of low-density single-family housing with a minimum lot size of ½-acre represent the predominant land use in Hillsborough (2,961 acres), and account for approximately 75 percent of the total land area. There are no commercial or industrial uses within the Town. The only non-residential uses within the Town are public facilities, parks and open space land, private and public schools, and two private recreation clubs.

Table 1: Summary of Existing Land Uses

Land Use Designation	Acreage in Town Limits
Residential	2,961
Public Facilities and Services	55
Private Schools	43
Open Space and Conservation	264
Private Recreational	113
Roadways and Other Right of Way	492

The existing General Plan land use designations are shown on Figure 2 and the proposed General Pan land use designations and zoning designations are shown on Figure 3 and Figure 4 respectively in the attachments.

Land Use Category Description

The following descriptions of land use designations are contained in the Town's General Plan:

Residential Uses

The Residential (R) designation allows for the development of single-family dwellings in a manner that is consistent with the existing character of the community. Additional uses that may be allowed include home businesses, second units, family day care homes and other compatible uses identified in the Hillsborough Municipal Code. The maximum allowed density is one single-family dwelling per ½ acre.

Public Facilities and Services

The Public Facilities and Services (PFS) designation allows for the development and operation of services and facilities that are necessary to meet the community's needs, while maintaining the character of the community. Allowable uses include public schools, Town Hall, fire and police facilities, other governmental facilities, parks, and other recreational facilities.

Private Schools

The Private Schools (PS) designation includes private school facilities within Hillsborough. Allowable development and uses associated with private school operation are determined by City Council review and approval. In addition to activities directly related to the operation of a private school, residential dwellings for school employees may be allowed.

Open Space and Conservation

The Open Space and Conservation (OSC) designation is used to preserve environmentally sensitive areas and maintain a high quality of light, air, and scenic beauty in the community. Allowable uses include unimproved open space and public facilities.

Private Recreational

The Private Recreational (PR) designation includes recreational facilities within Hillsborough that are operated for private use. The two existing facilities, the Burlingame Country Club and the Hillsborough Racquet Club, were both formed before the Residential District Ordinance was adopted. Allowed uses include the country club, with associated social and commercial uses, and the racquet club. In addition to activities directly related to the operation of the country club, residential dwellings for club employees may be allowed.

Vacant Land Uses

The Town of Hillsborough is a largely built out, entirely single-family residential community with little vacant land and very few underutilized sites. The proposed updated Housing Element identifies 136 vacant parcels, but has determined that only 23 of them are likely to be developed over the next eight years.

Zoning Designations

The Town's zoning ordinance, Title 17 of the Hillsborough Municipal Code, was adopted to protect and promote the public health, safety, comfort, convenience, prosperity, and general welfare of residents in the town. Additional purposes of this zoning ordinance are to implement the goals, objectives, policies, and programs of the general plan and to manage future growth and development in accordance with

that plan. In addition, the zoning ordinance serves to conserve and protect the natural resources, natural beauty, and significant environmental amenities of the town, as well as promote adequate light, air, privacy, and open space for each dwelling and to retain the scale and character of existing residential neighborhoods. There is one designated zoning district within the town, namely, the Residence District (RD), which consists of all of the land within the boundaries of the town.

6th CYCLE HOUSING ELEMENT UPDATE

Housing Element Update

All cities and counties in California are required to meet their fair share of the State's housing needs. The planning process for accomplishing this is typically implemented every eight years through an update of the Housing Element of each jurisdiction's General Plan. Housing Elements are long-range policy documents mandated by the State and further required to be reviewed and certified by the State of California's Housing and Community Development Department (HCD). The Town of Hillsborough's most recent Housing Element Update covers the period of 2014-2022 (5th housing cycle) and included a Regional Housing Needs Allocation assignmentof 91 new housing units at different income levels to be constructed during the 2014 through 2022 planning period.

All San Mateo County jurisdictions are undertaking planning for the 6th housing cycle and the RHNA assignments assigned to their jurisdiction for the 2023-2031 planning period. The proposed Housing Element update must be approved by HCD and adopted by the Town Council. The main components of the Housing Element update are dictated by State law and typically mustinclude:

- A detailed analysis of the Town's demographic, economic, and housing characteristics
- A comprehensive analysis of the barriers to producing and preserving housing
- A review of the Town's progress in implementing its adopted housing policies andprograms
- An identification of goals, objectives, and policies, in addition to a full list of programs that will help the Town carry out the plan's vision
- A list of sites that could accommodate new housing, demonstrating the Town's ability tomeet its target number of new homes established in the RHNA

In addition, Housing Elements will have to address recent changes in state housing law enacted by SB 9 and SB 10 which took effect January 1, 2022.

SB 9 allows property owners to split a single-family lot into two lots, add a second home to their lot or split their lot into two and place duplexes on each. The last option would create four housing units on a property currently limited to a single-family house.

SB 10 would, notwithstanding any local restrictions on adopting zoning ordinances, authorize a local government to adopt an ordinance to zone any parcel for up to 10 units of residential density per parcel, at a height specified in the ordinance, if the parcel is located in a transit-rich area or an urban infill site, as those terms are defined.

State Regional Housing Needs Allocation (RHNA)

Under State law, each city and county in California must plan to accommodate its share of the regional housing need - called the Regional Housing Needs Allocation (RHNA) - for the coming 8-year planning period. The State determines the estimated need for new housing in each region of California, based on population projections and other factors including rates of vacancy, overcrowding, and cost burden.

The various regional planning agencies then allocate a target to each city or town within their jurisdiction, considering factors such as access to jobs, good schools, and healthy environmental conditions. RHNA is split into four categories representing different levels of affordability, based on area median income (AMI) in the county. The affordability categories are as follows:

• Very Low Income - Households making less than 50 percent of AMI

• Low Income - Households making 50-80 percent of AMI

• Moderate Income - Households making 80-120 percent of AMI

• Above Moderate Income - Households making more than 120 percent of AMI

The RHNA is required to meet the five statutory objectives summarized below:

1. Increase housing supply and mix of housing types, with the goal of improving housing affordability and equity in all cities and counties within the region.
2. Promote infill development and socioeconomic equity; protect environmental and agricultural resources; encourage efficient development patterns; and achieve greenhouse gas reduction targets.
3. Improve intra-regional jobs-to-housing relationship, including the balance between low-wage jobs and affordable housing units for low-wage workers in each jurisdiction.
4. Balance disproportionate household income distributions (more high-income allocation to lower-income areas, and vice-versa)
5. Affirmatively further fair housing

The RHNA must also be consistent with the growth pattern from the region's long-range plan fortransportation, housing, the economy, and the environment, known as Plan Bay Area 2050.

Hillsborough RHNA Assignment

The Town of Hillsborough has been assigned a RHNA goal of 554 new housing units for the 2023-2031 planning period as follows:

- Very Low-income units: 153
- Low-income Units: 88
- Moderate Income Units: 87
- Above Moderate Income Units: 223

This RHNA assignment represents an increase of 463 units or 509% over the previous (5th housing cycle) allocation.

Because the Housing Element has to plan for or have policies in place to accommodate the RHNA assignment in any given planning period, jurisdictions typically plan for a slightly higher number of housing units than the actual RHNA assignment. The Town of Hillsborough has determined it will include a buffer equaling approximately nine percent of the number of affordable housing units or an additional 51units.Thus, for the purposes of the CEQA document the Town is planning for a total of 605 units (554 RHNA + 51 buffer units).

Proposed Housing Element and General Plan Updates

A draft of the 2023-2031 Housing Element and related documents were submitted for HCD review in March 2023. Town staff are currently revising the draft 2023-2031 Housing Element

and making revisions in response to HCD's review comments.

The updated Housing Element must identify possible sites where future housing can be built, called opportunity sites, and identify the potential number of homes that can be built on those sites (see Figures 5, 6, and 7). Hillsborough anticipates accommodating the new housing by implementing the following five strategies:

- Facilitating the further development of Accessory Dwelling Units (ADUs)
- Facilitating the completion of Pipeline Projects
- Facilitating development on Vacant Opportunity Sites
- Facilitating development on Subdivision/Lot Split Sites
- Facilitating development on Multi-Family Opportunity Sites

Table 2: Housing Element Approaches

Approaches	Very Low Income	Low Income	Moderate Income	Above Moderate	Total Units
Approach 1: Accessory Dwelling Units (ADUs)	120	80	80	120	**400**
Approach 2: Pipeline Projects				12	**12**
Approach 3: Vacant Opportunity Sites				23	**23**
Approach 4: Subdivision/Lot Split Opportunity Sites:				43	**43**
Approach 5: Multi-family Residential Opportunity Sites:					
Tobin Clark	44		6	50	**100**
Town Hall	7	9			**16**
Nueva School & Burlingame Country Club			11		**11**
TOTAL	**171**	**89**	**97**	**248**	**605 (9% Buffer)**
RHNA Allocation	155	89	87	223	554

In addition to updating the Housing Element, the following other General Plan Elements and ordinances are proposed to be updated:

Land Use Element – proposed updates to include two new land use designations to allow for multi-family residential uses on two Town-owned sites.

Circulation Element – proposed updates may include necessary revisions to VMT impacts, circulation problem areas and solutions, etc.

Open Space and Conservation Element – revisions necessary to update a change in the land use designation in the Tobin Clark area, and open space areas converted to housing.

Public Safety Element – proposed updates to provide necessary revisions throughout the Element.

Noise Element – proposed updates to include revisions as necessary, depending on the analysis of vehicle trips generated by new residential development and increased construction activities.

Zoning Updates

The Draft Housing Element update does not include any rezoning of private properties. However, two Town-owned sites; Town Hall and Tobin Clark, are designed for rezoning to allow for multi-family development.

Objective Multi-family Development Standards

The Town will also establish Objective Development Standards for multi-family housing development that will establish objective standards for such things as lot coverage, floor area ratio, building height and setback requirements, and parking requirements.

Separate from the EIR, following a comprehensive community engagement process the Town will also establish Objective Design Standards and landscaping requirements for multi-family housing projects.

PROJECT OBJECTIVES:

The Project establishes the goals, policies, and programs that will provide Town staff and discretionary bodies with a foundation for decisions related to long-range planning for housing development within the town. The overarching goal of the program is to revise the adopted Housing Element to create a policy framework that meets the objectives listed below. For the purposes of this Program EIR, the project objectives include the following:

1. Promote the preservation and improvement of existing housing and neighborhoods, and promote new housing growth to provide more affordable and market rate housing that meets the Town's Cycle 6 Regional Housing Needs Allocation (RHNA).

2. Meet housing needs by encouraging a variety of housing development affordable at all income levels, including construction of Accessory Dwelling Units (ADUs), multi-family housing on Town-owned land, subdivision/lot split opportunity sites and other housing choices on vacant opportunity sites, private recreational sites, and institutionally owned sites.

3. Reduce, remove and/or mitigate potential governmental constraints and barriers to housing development and promote equal housing opportunities for all people; incorporate best practices related to land use, racial equity, mobility, housing affordability, safety, environmental justice, community services, and healthy neighborhoods.

4. Affirmatively further fair housing, and take meaningful actions to overcome patterns of segregation, promote fair housing choice, eliminate disparities in opportunities, and foster inclusive communities free from discrimination.

5. Provide adequate housing for all segments of the population, within the Town's constraints; promote and assist in the development of housing that meets the needs of special needs communities in Hillsborough while protecting the character of the Town.

6. Engage residents and stakeholders to generate ideas for potential Town-specific approaches to meet the Town's Cycle 6 RHNA, gain insight on the greatest challenges and opportunities that face Hillsborough, and ensure equitable and inclusive processes, policies, investments, and service systems.

7. Expand and update technology and innovative practices to create smart, sustainable communities, and adaptable infrastructure systems.

8. Protect lives and property from risks associated with wildfire-related emergencies; reduce the potential loss of life, injury, and property damage due to flooding, and seismic and geologic hazards.

PROGRAMMATIC EIR:

The Town of Hillsborough has determined that the proposed Housing Element Update Project will require preparation of a Program EIR pursuant to the California Environmental QualityAct (CEQA). The Program EIR will evaluate the environmental impacts resulting from implementation of the project and will recommend mitigation measures to avoid or reduce significant impacts, where applicable. The Program EIR also is intended to help the Town review future project proposals pursuant to section 15168 (Program EIR) of the CEQA Guidelines. The following environmental topics will be evaluated in the EIR:

- Aesthetics
- Agriculture and Forestry
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Tribal Cultural Resources
- Transportation and Circulation
- Utilities and Service Systems
- Wildfire
- Cumulative Impacts
- Alternatives

OTHER PUBLIC AGENCIES WHOSE REVIEW OR APPROVAL IS REQUIRED:

- **California Department of Housing and Community Development (HCD)** will approve the Housing Element update prior to its adoption.

Attachments:

Figure 1: Town Limits and Planning Area

Figure 2: Existing General Plan Land Use Designations

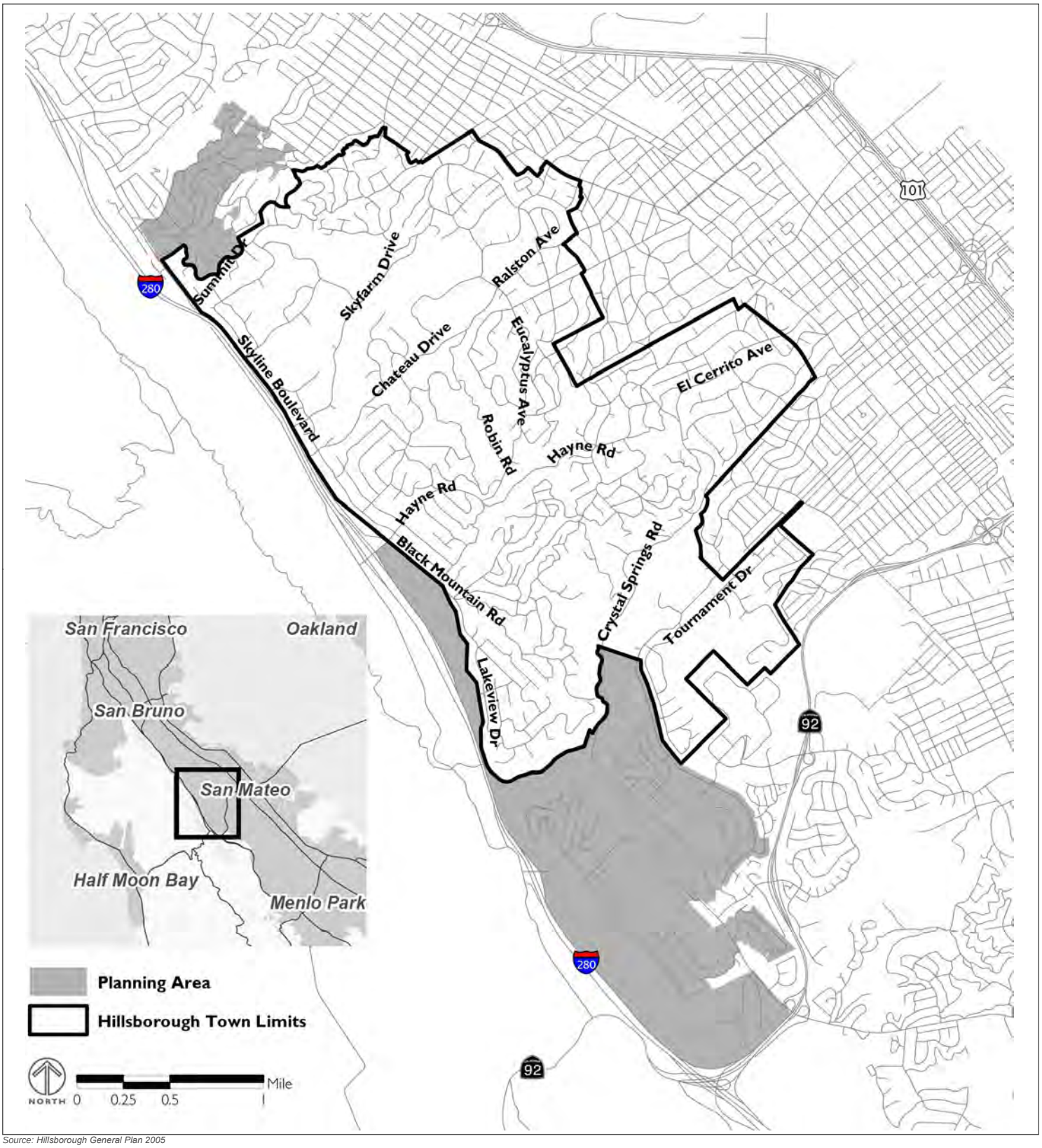
Figure 3: Proposed General Plan Land Use Designations

Figure 4: Proposed Zoning Map

Figure 5: Vacant Opportunity Sites

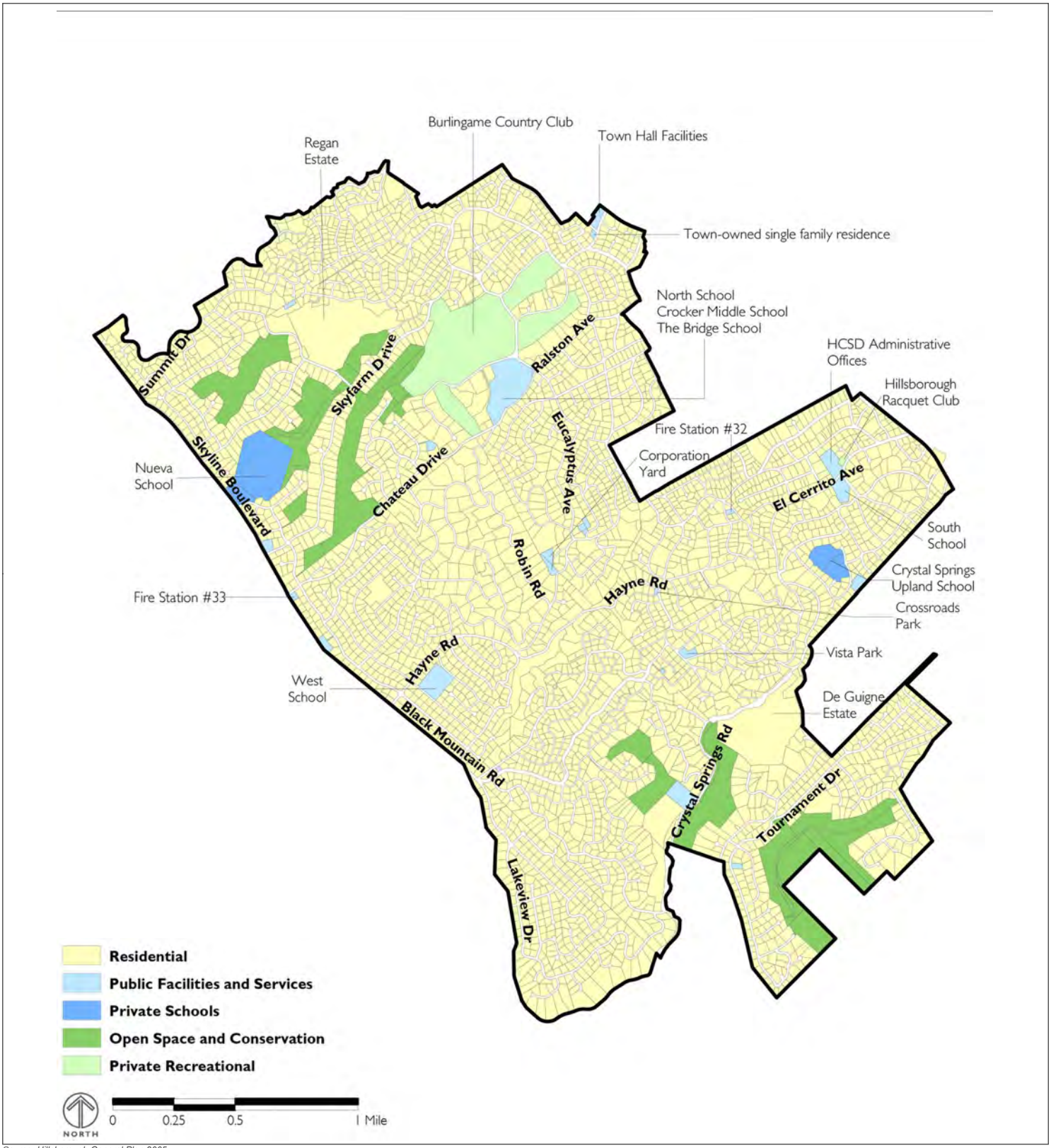
Figure 6: Proposed Subdivision and Lot Split Opportunity Sites

Figure 7: Proposed Multi-Family Opportunity Sites



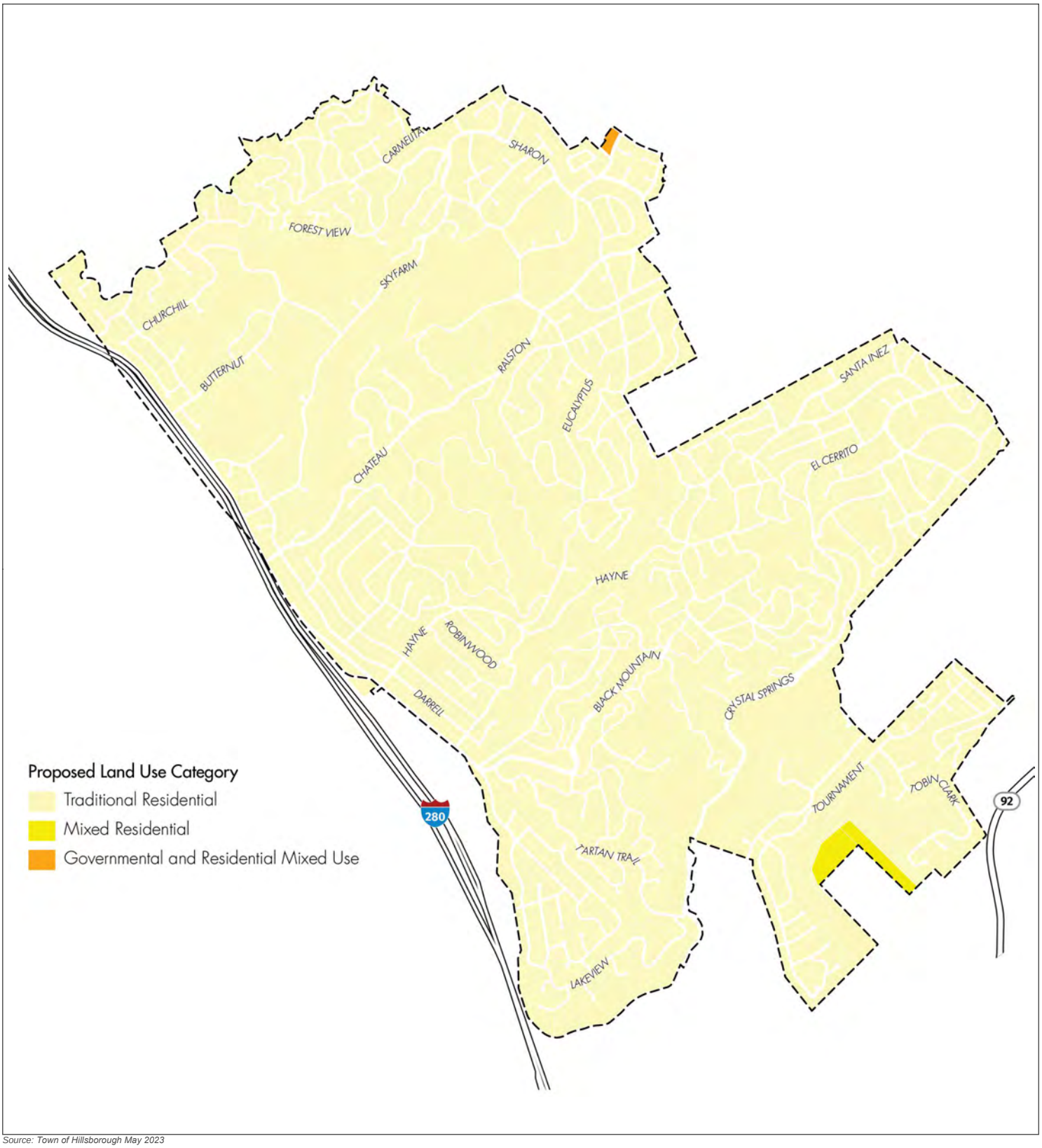
Source: Hillsborough General Plan 2005

Figure 1 Town Limits and Planning Area Map



Source: Hillsborough General Plan 2005

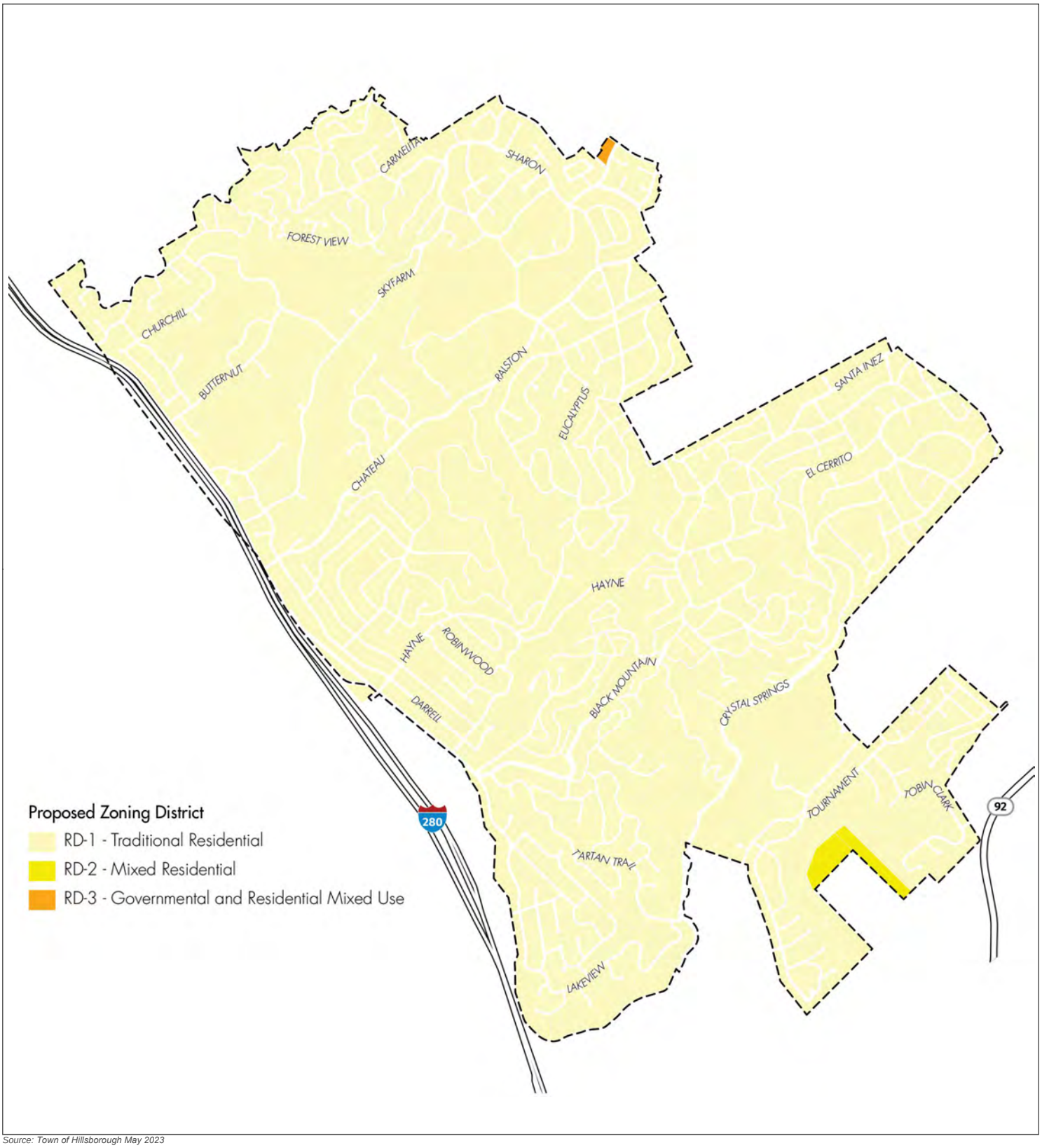
Figure 2 Existing General Plan Land Use Designations



Source: Town of Hillsborough May 2023

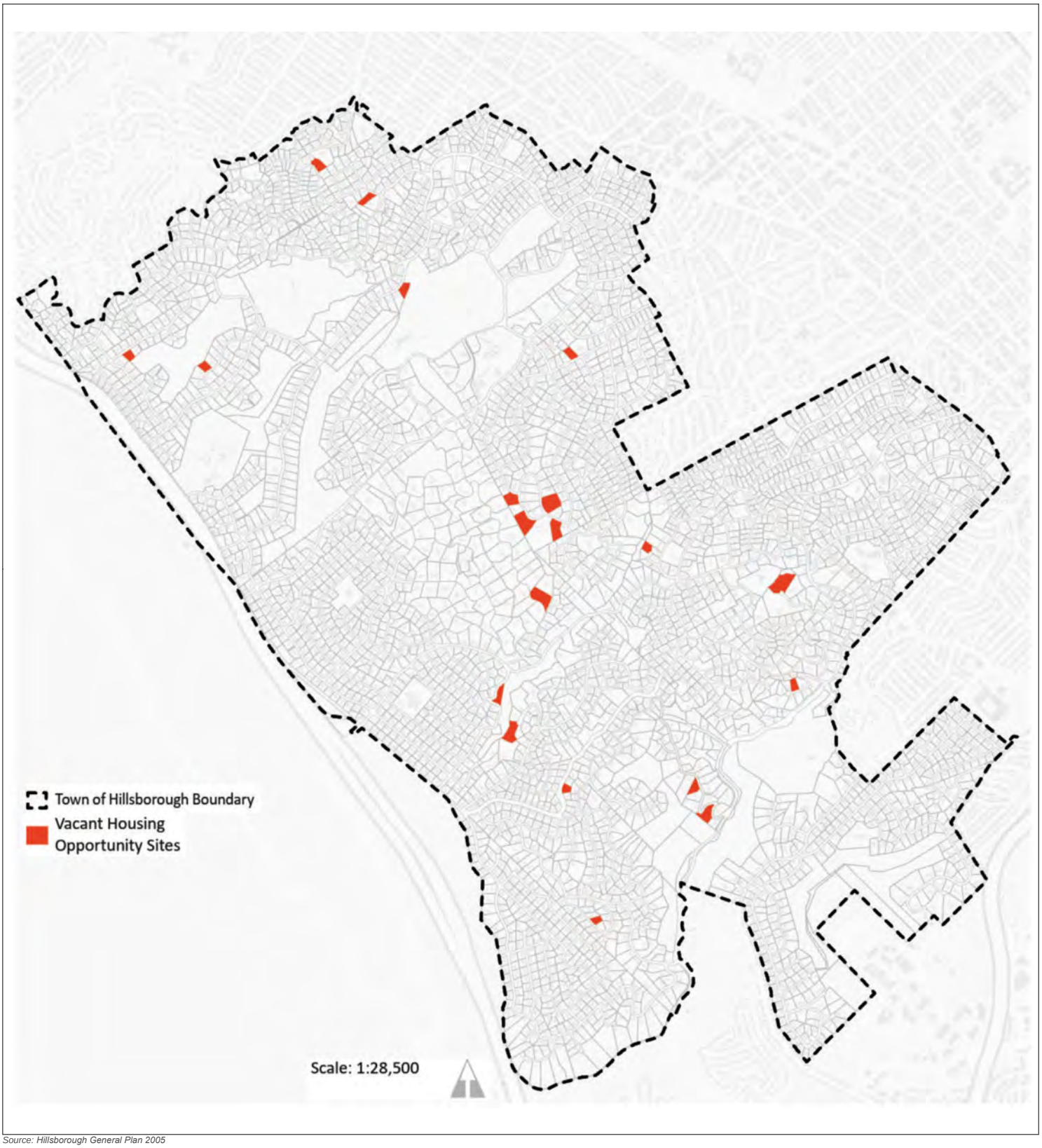
Figure 3 Proposed General Plan Land Use Designation

Hillsborough 6th Cycle Housing Element Update EIR



Source: Town of Hillsborough May 2023

Figure 4 Proposed Zoning Map



Source: Hillsborough General Plan 2005

Figure 5 Vacant Opportunity Sites

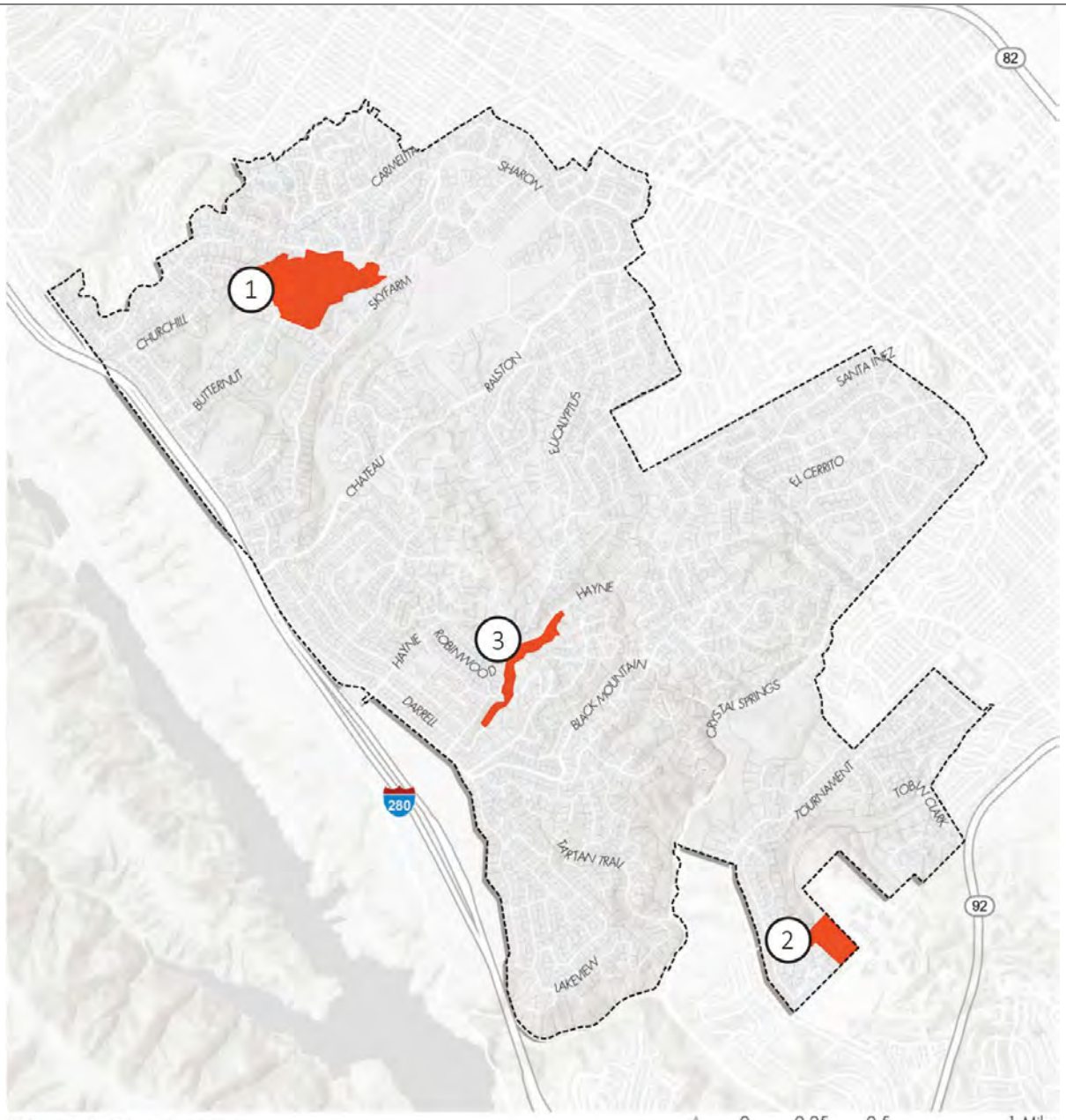
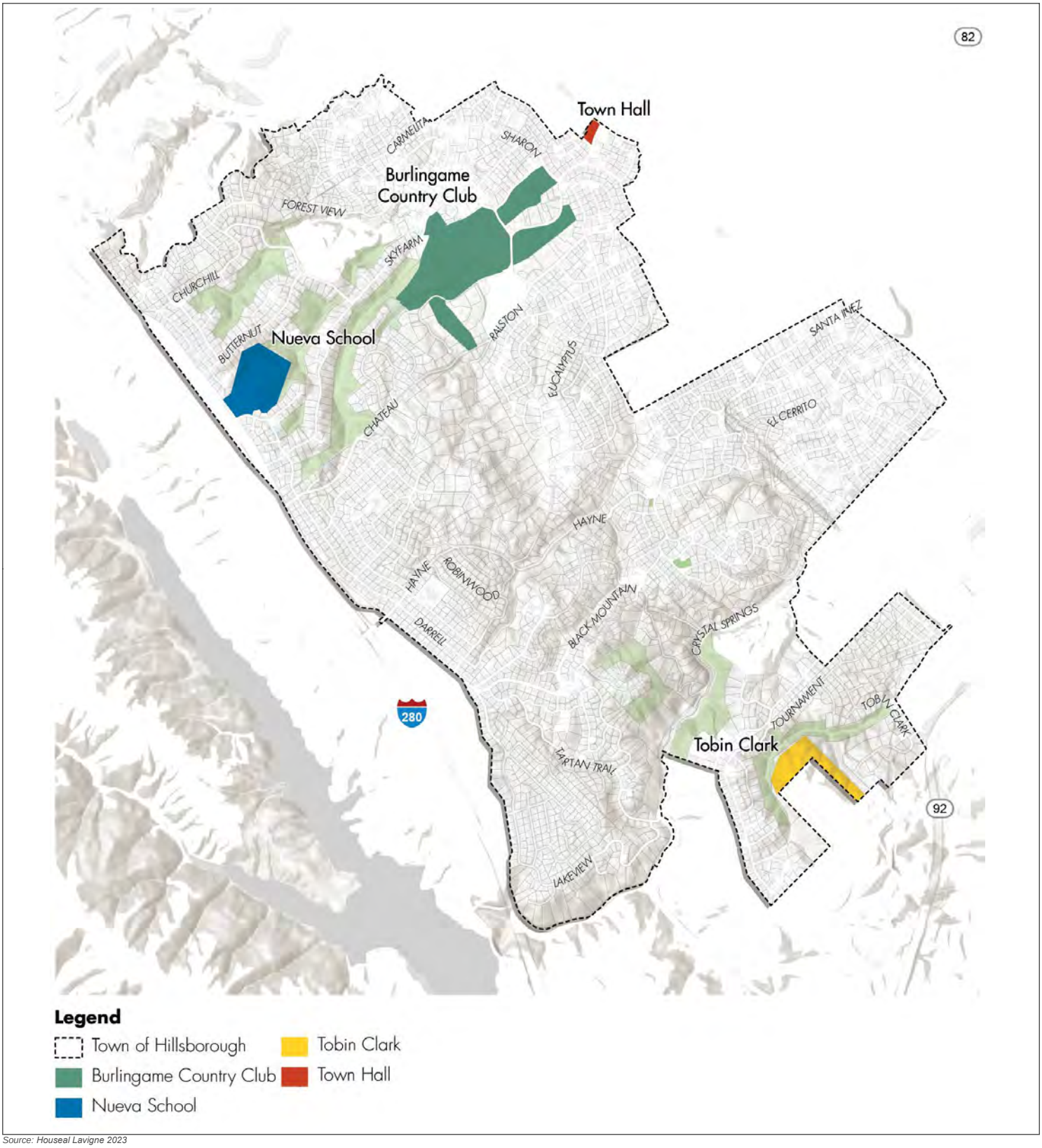


Table 8.9: Subdivision/Lot Split Opportunity Sites

	APN	Property Address / Name	Parcel Size	Potential Subdivision Yield
1	028040120	2260 Redington Road	49.52	35
2	038281280	50 Brooke Court	11.64	3
3	030191030	Hayne Road	10.90	5
TOTAL				**43**

Source: Houseal Lavigne 2023

Figure 6 Proposed Subdivision/Lot Split Opportunity Sites



Source: Houseal Lavigne 2023

Figure 7 Proposed Multi-Family Opportunity Sites

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH #

Project Title: Town of Hillsborough 6th Cycle Housing Element and Focused General Plan Update and Municipal Code Update Program EIR

Lead Agency: Town of Hillsborough
Contact Person: Liz Ruess
Mailing Address: 1600 Floribunda Avenue
Phone: (650) 375-7422
City: Hillsborough Zip: 94010
County: San Mateo

Project Location: County: San Mateo City/Nearest Community: Hillsborough
Cross Streets: Major streets are Ralston Avenue, Chateau Drive, and Crystal Springs Road. Zip Code: 94010
Longitude/Latitude (degrees, minutes and seconds): 37 ° 34 ' 26.76 " N / 122 ° 22 ' 45.84 " W Total Acres: 3,928
Assessor's Parcel No.: Many APNs Section: Twp.: Range: Base:
Within 2 Miles: State Hwy #: I-280, SR 82, SR 92, Hwy 101 Waterways: San Francisco Bay, Crystal Springs Reservoir, San Mateo Creek, Laurel Creek, etc.
Airports: San Francisco International Airport Railways: Caltrain Schools: Hillsborough City School District

Document Type:

CEQA: ■ NOP ☐ Draft EIR NEPA: ☐ NOI Other: ☐ Joint Document
☐ Early Cons ☐ Supplement/Subsequent EIR ☐ EA ☐ Final Document
☐ Neg Dec (Prior SCH No.) ☐ Draft EIS ☐ Other:
☐ Mit Neg Dec Other: ☐ FONSI

Local Action Type:

■ General Plan Update ☐ Specific Plan ■ Rezone ☐ Annexation
☐ General Plan Amendment ☐ Master Plan ☐ Prezone ☐ Redevelopment
☐ General Plan Element ☐ Planned Unit Development ☐ Use Permit ☐ Coastal Permit
☐ Community Plan ☐ Site Plan ☐ Land Division (Subdivision, etc.) ☐ Other:

Development Type:

☐ Residential: Units Acres
☐ Office: Sq.ft. Acres Employees
☐ Commercial: Sq.ft. Acres Employees
☐ Industrial: Sq.ft. Acres Employees
☐ Educational:
☐ Recreational:
☐ Water Facilities: Type MGD
☐ Transportation: Type
☐ Mining: Mineral
☐ Power: Type MW
☐ Waste Treatment: Type MGD
☐ Hazardous Waste: Type
■ Other: General Plan Update

Project Issues Discussed in Document:

■ Aesthetic/Visual ☐ Fiscal ■ Recreation/Parks ■ Vegetation
☐ Agricultural Land ■ Flood Plain/Flooding ■ Schools/Universities ■ Water Quality
■ Air Quality ■ Forest Land/Fire Hazard ☐ Septic Systems ■ Water Supply/Groundwater
☐ Archeological/Historical ■ Geologic/Seismic ■ Sewer Capacity ■ Wetland/Riparian
■ Biological Resources ☐ Minerals ■ Soil Erosion/Compaction/Grading ■ Growth Inducement
☐ Coastal Zone ■ Noise ■ Solid Waste ■ Land Use
■ Drainage/Absorption ■ Population/Housing Balance ■ Toxic/Hazardous ■ Cumulative Effects
☐ Economic/Jobs ■ Public Services/Facilities ■ Traffic/Circulation ☐ Other:

Present Land Use/Zoning/General Plan Designation:

The Town's Land Use designations are Residential, Public Facilities and Services, Private Schools, Open Space and Conservation, and Private Recreational.

Project Description: *(please use a separate page if necessary)*

The Town of Hillsborough (Town or Lead Agency) is updating the Housing Element of the Hillsborough General Plan according to the requirements of State law. The Town is preparing the EIR for the 6th Cycle Housing Element, Focused General Plan Update, and Municipal Code Update Project. In addition to the Housing Element, the Town proposes to update the General Plan Land Use, Circulation, Open Space and Conservation, Public Safety, and Noise Elements, and the Town Zoning Code. For the purposes of CEQA, the Town is planning for a total of 605 units (554 RHNA + 51 buffer units).

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

Reviewing Agencies Checklist

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with and "**X**".
If you have already sent your document to the agency please denote that with an "**S**".

X	Air Resources Board		Office of Historic Preservation
	Boating & Waterways, Department of		Office of Public School Construction
X	California Emergency Management Agency		Parks & Recreation, Department of
	California Highway Patrol		Pesticide Regulation, Department of
X	Caltrans District # 4		Public Utilities Commission
	Caltrans Division of Aeronautics	X	Regional WQCB # 2
	Caltrans Planning		Resources Agency
	Central Valley Flood Protection Board		Resources Recycling and Recovery, Department of
	Coachella Valley Mtns. Conservancy	X	S.F. Bay Conservation & Development Comm.
	Coastal Commission		San Gabriel & Lower L.A. Rivers & Mtns. Conservancy
	Colorado River Board		San Joaquin River Conservancy
	Conservation, Department of		Santa Monica Mtns. Conservancy
	Corrections, Department of		State Lands Commission
	Delta Protection Commission		SWRCB: Clean Water Grants
	Education, Department of		SWRCB: Water Quality
	Energy Commission		SWRCB: Water Rights
X	Fish & Game Region # 3		Tahoe Regional Planning Agency
	Food & Agriculture, Department of		Toxic Substances Control, Department of
X	Forestry and Fire Protection, Department of		Water Resources, Department of
	General Services, Department of		
	Health Services, Department of		Other:
X	Housing & Community Development		Other:
X	Native American Heritage Commission		

Local Public Review Period (to be filled in by lead agency)

Starting Date June 9, 2023 Ending Date July 10, 2023

Lead Agency (Complete if applicable):

Consulting Firm: MIG, Inc.
Address: Hearst Avenue
City/State/Zip: Berkeley, CA 94710
Contact: Barbara Beard
Phone: (510) 845-7549 ext. 5580

Applicant: Town of Hillsborough
Address: 1600 Floribunda Avenue
City/State/Zip: Hillsborough, CA 94010
Phone: (650) 375-7422

Signature of Lead Agency Representative: Barbara Beard, MIG **Date:** 6/9/2023

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.

California Department of Transportation

DISTRICT 4
OFFICE OF REGIONAL AND COMMUNITY PLANNING
P.O. BOX 23660, MS–10D | OAKLAND, CA 94623-0660
www.dot.ca.gov

Governor's Office of Planning & Research

Jul 10 2023

STATE CLEARINGHOUSE

July 10, 2023

SCH #: 2023060305
GTS #: 04-SM-2023-00527
GTS ID: 30045
Co/Rt/Pm: SM/280/ R15.762

Liz Ruess, Planning Manager
Town of Hillsborough
1600 Floribunda Avenue
Hillsborough, CA 94010

Re: Town of Hillsborough 6th Cycle Housing Element and Focused General Plan Update and Municipal Code Update Program– Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR)

Dear Liz Ruess:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Town of Hillsborough (Town) 6th Cycle Housing Element and Focused General Plan Update and Municipal Code Update Program. We are committed to ensuring that impacts to the State's multimodal transportation system and to our natural environment are identified and mitigated to support a safe, sustainable, integrated and efficient transportation system.

The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities. The following comments are based on our review of the June 2023 NOP.

Project Understanding

The proposed project will serve as an update of the existing Housing Element of the General Plan. The Housing element will be the focus with additional elements such as Land Use and Open Space. The project will also include updates to relevant implementation tools such as Zoning Ordinance, Subdivision Ordinance and Objective Development Standards. The future EIR will serve as an environmental assessment to the updated element and implementation tools. Hillsborough's town limit extends from I-280 on the west to the City of San Mateo on the east, the City of Burlingame to the north, and unincorporate areas of San Mateo County to the south.

Travel Demand Analysis
With the enactment of Senate Bill (SB) 743, Caltrans is focused on maximizing efficient development patterns, innovative travel demand reduction strategies, and multimodal improvements. For more information on how Caltrans assesses Transportation Impact Studies, please review Caltrans' Transportation Impact Study Guide (*link*).

If the project meets the screening criteria established in the Town's adopted Vehicle Miles Traveled (VMT) policy to be presumed to have a less-than-significant VMT impact and exempt from detailed VMT analysis, please provide justification to support the exempt status in alignment with the Town's VMT policy. Projects that do not meet the screening criteria should include a detailed VMT analysis in the Draft Environmental Impact Report (DEIR), which should include the following:

- VMT analysis pursuant to the Town's guidelines. Projects that result in automobile VMT per capita above the threshold of significance for existing (i.e. baseline) town-wide or regional values for similar land use types may indicate a significant impact. If necessary, mitigation for increasing VMT should be identified. Mitigation should support the use of transit and active transportation modes. Potential mitigation measures that include the requirements of other agencies such as Caltrans are fully enforceable through permit conditions, agreements, or other legally-binding instruments under the control of the Town.

- A schematic illustration of walking, biking and auto conditions at the project site and study area roadways. Potential traffic safety issues to the State Transportation Network (STN) may be assessed by Caltrans via the Interim Safety Guidance (*link*).

- The project's primary and secondary effects on pedestrians, bicycles, travelers with disabilities and transit performance should be evaluated, including countermeasures and trade-offs resulting from mitigating VMT increases. Access to pedestrians, bicycle, and transit facilities must be maintained.

Multimodal Transportation Planning
Please review and include the reference to the *Caltrans District 4 Pedestrian Plan* (2021) and the *Caltrans District 4 Bike Plan* (2018) in the DEIR. These two plans studied existing conditions for walking and biking along and across the STN in the nine-county Bay Area and developed a list of location-based and prioritized needs.

Please note that any Complete Streets reference should be updated to reflect Caltrans Director's Policy 37 (*link*) that highlights the importance of addressing the needs of non-motorists and prioritizing space-efficient forms of mobility, while also facilitating goods movement in a manner with the least environmental and social impacts. This supersedes Deputy Directive 64-R1, and further builds upon its goals of focusing on the movement of people and goods.

Integrated Transportation and Land Use Planning
Transportation and housing are integrally connected. The Housing Element Update process provides a mechanism to reflect current transportation and land use policy and adopt efficient land-use strategies such as transit-oriented, infill and mixed-use developments that can potentially reduce vehicle miles traveled and address climate change.

Please review and include the reference to the current California Transportation Plan (CTP) in the DEIR. CTP 2050 envisions that the majority of new housing located near existing housing, jobs, and transit, and in close proximity to one another will reduce vehicle travel and GHG emissions, and be accessible and affordable for all Californians, including disadvantaged and low-income communities. The location, density, and affordability of future housing will dictate much of our future travel patterns, and our ability to achieve the vision outlined in CTP 2050. Caltrans encourages the Town to consider and explore the potential of excess state-owned property for affordable housing development, per Executive Order N-06-19.

Caltrans looks forward to reviewing the DEIR that should demonstrate how the future housing development patterns align with the Town's adopted VMT policies. Caltrans supports collaboration with local agencies to work towards a safe, functional, interconnected, multi-modal transportation network integrated through efficient and equitable land use planning and policies. The Town should also continue to coordinate with Caltrans to identify and implement necessary network improvements and impact mitigation.

Lead Agency
As the Lead Agency, the Town of Hillsborough is responsible for all project mitigation, including any needed improvements to the STN. The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

Equitable Access
If any Caltrans facilities are impacted by the project, those facilities must meet American Disabilities Act (ADA) Standards after project completion. As well, the project must maintain bicycle and pedestrian access during construction. These access considerations support Caltrans' equity mission to provide a safe, sustainable, and equitable transportation network for all users.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Marley Mathews, Transportation Planner, via LDR-D4@dot.ca.gov.

For future early coordination opportunities or project referrals, please contact LDR-D4@dot.ca.gov.

Sincerely,



YUNSHENG LUO
Acting District Branch Chief
Local Development Review

c: State Clearinghouse

NATIVE AMERICAN HERITAGE COMMISSION



June 13, 2023

Liz Ruess
Town of Hillsborough
1600 Floribunda Ave.
Hillsborough, CA 94010

Re: 2023060305, Town of Hillsborough 6th Cycle Housing Element and Focused General Plan Update and Municipal Code Update Program EIR, San Mateo County

Dear Ms. Ruess:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project 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. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides 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 effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements**. If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

ACTING CHAIRPERSON
Reginald Pagaling
Chumash

SECRETARY
Sara Dutschke
Miwok

COMMISSIONER
Isaac Bojorquez
Ohlone-Costanoan

COMMISSIONER
Buffy McQuillen
Yokayo Pomo, Yuki, Nomlaki

COMMISSIONER
Wayne Nelson
Luiseño

COMMISSIONER
Stanley Rodriguez
Kumeyaay

COMMISSIONER
Vacant

COMMISSIONER
Vacant

COMMISSIONER
Vacant

EXECUTIVE SECRETARY
Raymond C. Hitchcock
Miwok, Nisenan

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

a. A brief description of the project.

b. The lead agency contact information.

c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).

d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).

a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

a. Alternatives to the project**.**

b. Recommended mitigation measures**.**

c. Significant effects**.** (Pub. Resources Code §21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:

a. Type of environmental review necessary.

b. Significance of the tribal cultural resources.

c. Significance of the project's impacts on tribal cultural resources.

d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

a. Whether the proposed project has a significant impact on an identified tribal cultural resource.

b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:

a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or

b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:

a. Avoidance and preservation of the resources in place, including, but not limited to:

i. Planning and construction to avoid the resources and protect the cultural and natural context.

ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.

b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:

i. Protecting the cultural character and integrity of the resource.

ii. Protecting the traditional use of the resource.

iii. Protecting the confidentiality of the resource.

c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.

d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).

e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).

f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.

b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.

c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. Tribal Consultation: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. No Statutory Time Limit on SB 18 Tribal Consultation. There is no statutory time limit on SB 18 tribal consultation.
3. Confidentiality: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. Conclusion of SB 18 Tribal Consultation: Consultation should be concluded at the point in which:
    a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
    b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: http://nahc.ca.gov/resources/forms/.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (https://ohp.parks.ca.gov/?page_id=30331) for an archaeological records search. The records search will determine:
    a. If part or all of the APE has been previously surveyed for cultural resources.
    b. If any known cultural resources have already been recorded on or adjacent to the APE.
    c. If the probability is low, moderate, or high that cultural resources are located in the APE.
    d. If a survey is required to determine whether previously unrecorded cultural resources are present.

2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
    a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
    b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:

a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.

b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.

a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.

b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.

c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address: Cody.Campagne@nahc.ca.gov

Sincerely,

Cody Campagne

Cody Campagne
Cultural Resources Analyst

cc: State Clearinghouse

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Appendix B: Housing Element Update Policies

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Policies, Goals, & Actions

The policies, goals, and actions provide the Town of Hillsborough with a coordinated and comprehensive strategy for promoting the production of safe, decent, and affordable housing throughout the community.

The Town of Hillsborough's Housing Element includes policies to promote the maintenance of existing housing and increase capacity for additional housing options. The Housing Element ensures that current and future housing needs of people living and working in the Town of Hillsborough are met.

The Town's Housing Element includes policies and related goals and actions that will assist in meeting the housing needs of residents. A separate action plan includes the specific actions the Town will take to implement each policy and achieve each goal.

The Action Matrix Table below identifies the lead Town department that will implement each action, along with the time frame for completion and key milestones and metrics for each action detailed above.

Housing Element Action Matrix				
	Town Lead	**Time Frame**	**Milestone**	**Priority**
Policy 1: Reduce Barriers to Housing Development				
Goal 1.1: Allow for increased subdivision opportunities throughout the community				
Action 1.1 (a): Continue to implement Senate Bill 9 (SB9), as appropriate. SB 9 allows all properties within a "single-family residential zone" to be subdivided into two parcels and developed with two primary dwelling units per lot, irrespective of local standards.	City Council and Building & Planning Department	Jan-23	Continue to implement State Law related to SB 9.	High
Action 1.1 (b): Complete a study to determine if modifications to chapter 16 of the Hillsborough Municipal Code (Subdivisions) would facilitate the subdivision and development of additional housing in a manner that protects public safety. If the study indicates that the change would likely result in increased development and have minimal impact to public safety, the Town will modify existing subdivision standards pertaining to average slope and minimum lot size.	City Manager's Office and Building & Planning Department	Jan-24; Jun-24	Completion of feasibility analysis of modifications to hillside development standards. Adoption of modified hillside development standards.	Mid
Goal 1.2: Streamline the project review process for housing-related applications				
Action 1.2 (a): Improve transparency in permitting time and workflow by updating the Town's ageing permit tracking software to a streamlined, user-friendly web-based platform with online payments accessible to applicants 24-hours/day, 365 days/year.	City Manager's Office and Building & Planning Department	Jan-24	Fully updated and implemented permitting software.	Mid
Action 1.2 (b): Update all housing development-related application forms to ensure accuracy, clarity, and compliance with all state statutes, including the Permit Streamlining Act, Housing Accountability Act and Housing Crisis Act of 2019 (SB 330).	Building & Planning Department	Jan-24	All housing development-related application forms updated and in compliance with all state statutes.	High
Action 1.2 (c): Continue to evaluate and improve the streamlined processing system to facilitate residential development.	Building & Planning Department	Annually	Evaluate to identify potential efficiencies on an annual basis.	Low
Action 1.2 (d): Utilize CEQA exemptions for infill development sites, such as the Nueva private school site, to shorten entitlement review time.	City Attorney and Building & Planning Department	Project-by- project basis	Utilize and promote CEQA exemptions on qualifying projects.	Low

Housing Element Action Matrix				
	Town Lead	**Time Frame**	**Milestone**	**Priority**
Goal 1.3: Assist Town residents in the resolution of land use conflicts to promote successful housing development projects				
Action 1.3 (a): Maintain the Town's contract supporting Peninsula Conflict Resolution Center (PCRC) and refer conflicted parties to PCRC's no-fee mediation services.	City Manager's Office and Building & Planning Department	Annually	Contract with PCRC updated annually.	Low
Goal 1.4 Amend the Town's zoning regulations to comply with all recently adopted state legislation				
Action 1.4 (a): Establish standards for group homes, including group homes with seven or more persons and ensure the Town's definition of group home in the zoning ordinance is in compliance with federal and state fair housing laws.	City Attorney and Building & Planning Department	Jan-24	Town zoning ordinance complies with federal and state fair housing laws.	High
Action 1.4 (b): Amend the Density Bonus section of the zoning ordinance to ensure it is in compliance with state density bonus law. (Government Code Sections 65915 et seq.)	City Attorney and Building & Planning Department	Jan-24	Town Density Bonus section of the zoning ordinance complies with Government Code Sections 65915 et seq.	High
Action 1.4 (c): Ensure the zoning ordinance is in compliance with the Employee Housing Act.	City Attorney and Building & Planning Department	Jan-24	Town zoning ordinance complies with the Employee Housing Act.	High
Action 1.4 (d): Ensure the Town's definition of transitional and supportive housing in the zoning ordinance is in compliance with Government Code Section 65382 and Section 65650 and amend the zoning ordinance to permit transitional and supportive housing as required by Sections 65683 and Sections 65650 et seq.	City Attorney and Building & Planning Department	Jan-24	Town zoning ordinance complies with Government Code Section 65382 and Section 65650.	High
Action 1.4 (e) Ensure the Town's regulations pertaining to Emergency Shelters are in compliance with Government Code Section 65583.	City Attorney and Building & Planning Department	Jan-24	Town zoning ordinance complies with Government Code Section 65583.	High
Action 1.4 (f): Amend the zoning ordinance to permit Low Barrier Navigation Centers in zones as required by Government Code Section 65662.	City Attorney and Building & Planning Department	Jan-24	Town zoning ordinance complies with Government Code Section 65662.	High
Action 1.4 (g): Amend the Town's parking requirements for development within one-half mile of a major transit stop consistent with Government Code Section Government Code Section 65863.2.	City Attorney and Building & Planning Department	Jan-24	Town zoning ordinance complies with Government Code Section 65863.2.	High
Goal 1.5: Amend the Town's zoning regulations to accommodate a variety of housing types.				
Action 1.5 (a): Eliminate the minimum required residential structure size.	City Attorney and Building & Planning Department	Jan-24	Zoning ordinance amendment adopted.	High

Housing Element Action Matrix				
	Town Lead	**Time Frame**	**Milestone**	**Priority**
Action 1.5 (b): Replace the term "family" with the term "household" throughout the zoning ordinance.	City Attorney and Building & Planning Department	Jan-24	Zoning ordinance amendment adopted.	High
Goal 1.6: Establish an Affordable Housing Impact Fee program and associated Housing Choice Fund.				
Action 1.6 (a): Establish an Affordable Housing Impact Fee to be levied upon all above moderate-income housing development and substantial reconstruction.	City Attorney and Building & Planning Department	Jan-24	Zoning and subdivision ordinances amended to include Affordable Housing Impact Fee requirement.	High
Action 1.6 (b): Establish a Housing Choice Fund in which all Affordable Housing Impact Fee dollars will be deposited.	City Attorney and Finance Department	Jan-24	Fund infrastructure established.	High
Action 1.6 (c): Establish a forgivable loan program to subsidize the development of deed restricted affordable units, which may include special needs housing, utilizing Housing Choice Fund dollars.	Finance Department and Building & Planning Department	Mar-24	Conduct robust community outreach and education to advertise the availability of Housing Choice Fund dollars.	Mid
Action 1.6 (d): Tier the maximum amount of a forgivable loan available based on the income level at which the units will be deed restricted.	Finance Department and Building & Planning Department	Mar-24	Establish a tiered amount of available Housing Choice Fund dollars and conduct robust community outreach and education to ensure residents, developers, realtors, etc. are aware.	Mid
Action 1.6 (e): Establish a Housing Choice Fund monitoring program to track compliance with deed restrictions and to monitor for no net loss of affordable units.	Building & Planning Department	Bi-Annually	Include the results of the Housing Choice Fund monitoring program in the Town's APRs and utilize the results to inform mid-cycle adjustments.	Low
Goal 1.7: Build support for the development of new housing in Hillsborough.				
Action 1.7 (a): Continue to encourage developers to have neighborhood meetings with residents early in the discretionary land use permit process as part of the application submittal to undertake problem solving and facilitate more informed, faster, and constructive development planning and review.	Building & Planning Department, City Manager's Office	Case-by-case basis	Make mailing addresses for properties in close proximity to potential development sites available to developers in order to facilitate developer outreach and successful neighborhood meetings.	Low
Action 1.7 (b): Coordinate with housing advocacy groups, neighborhood groups, and organizations like HIP Housing to build public understanding and support for workforce, special needs housing and other issues related to housing, including the community benefits of affordable housing.	Building & Planning Department, City Manager's Office	Annually	In partnership with housing advocacy groups, neighborhood groups, and organizations like HIP Housing, develop an annual article for the Town's e-newsletter about the community benefits of recent affordable housing development.	Low

Housing Element Action Matrix				
	Town Lead	**Time Frame**	**Milestone**	**Priority**
Action 1.7 (c): Regularly reach out to community groups and residents representing a broad range of socio-economic groups in the community to solicit ideas for housing strategies when they are discussed at elected/appointed official meetings.	Building & Planning Department, City Manager's Office	Case-by-case basis	Coordinate with local community groups and schools (to send notification to families of students in an effort to reach out to residents representing a broad range of socio- economic groups) regarding new housing and land use policies under consideration and to solicit feedback.	Low
Policy 2: Promote the Construction and Affordability of Accessory Dwelling Units (ADUs)				
Goal 2.1: Continue to support and fund the Town ADU Ombudsperson to guide property owners through the Town's ADU development process.				
Action 2.1 (a): Extend or expand the current ADU Ombudsperson position to ensure sufficient capacity for timely review and approval of ADU permits, and budget accordingly for implementation.	City Council, City Manager's Office, and Building & Planning Department	Jul-23	Staffing and budget analysis completed to determine resources necessary for the ADU Ombudsperson position(s).	High
Action 2.1 (b): Annually review ADU application and approval processes, making improvements where needed to make it easier for property owners to develop ADUs and JADUs.	Building & Planning Department	Annually	Improved, updated ADU application process.	Low
Action 2.1 (c): Analyze the budget impacts of continuing to reduce/waive ADU development review fees.	Finance Department and Building & Planning Department	Annually	Completed analysis of financial implications and cost-benefit assessment of reducing/ waiving ADU development review fees, while funding the ADU Ombudsperson position, budget modifications as necessary.	Low
Action 2.1 (d): Increase Accessory Dwelling Unit production by encouraging homeowners and developers to include attached or detached Accessory Dwelling Units in existing or new homes.	Building & Planning Department	Annual and Ongoing	Annual workshop to provide education and increase ADU production.	Mid
Goal 2.2: Further streamline and expedite the ADU and JADU permitting process.				
Action 2.2 (a): Analyze incentives for deed restricted ADUs to encourage rental to very-low-income households.	Finance Department and Building & Planning Department	Jan-24 -2025	Completed assessment of incentives for deed-restriction of ADUs to be rented at very- low- income rates. Evaluate whether various incentives justify deed restrictions and whether there is a positive impact on ADU production. Implement accordingly.	Mid

Housing Element Action Matrix				
	Town Lead	Time Frame	Milestone	Priority
Action 2.2 (b): Establish an ADU Review Team comprised of representatives from the Town's various departments including planning, fire, police, and public works and conduct regular weekly meetings to ensure efficient review of ADU applications.	Building & Planning Department, CCFD, Police Dept., Public Works Dept.	Jan-24 -2025	Creation of ADU Review Team and commencement of regular review meetings.	Mid
Action 2.2 (c): Incentivize ADUs and JADUs to be constructed along with new single-family detached housing by allowing concurrent permit review and approval and no-cost deed recording with Town notary.	Building & Planning Department and City Council	Jan-24 -2025	Increased ADU production.	Mid
Action 2.2 (d): Continue ADU Exception process to allow exceptions for specified zoning standards, such as maximum lot coverage and minimum landscape coverage, to accommodate ADUs and JADUs that do not comply with every applicable standard in Section 17.52.020 .	Building & Planning Department, CCFD, Police Dept., Public Works Dept.	Jan-23	Internal evaluation of pros/cons of objective, administrative exceptions for specified zoning standards. Consider expanding ADU Exception process to expedite review.	Mid
Action 2.2 (e): In coordination with the Central County Fire Department and CalFire, establish pre-approved fire parameters for ADUs to streamline fire related review.	CCFD and Building & Planning Department	Jan-24 -2025	Final document including pre- approved fire parameters for ADUs.	Mid
Action 2.2 (g): In coordination with 21 Elements, assess the feasibility of developing 80 percent complete construction drawings for ADUs to lower costs associated with engineering and architecture.	Building & Planning Department	Jan-24 -2025	Evaluation of pros/ cons and feasibility of developing 80 percent complete construction drawings for ADUs.	Mid
Action 2.2 (h): Update the ADU permit application requirements to require disclosure of number of bedrooms in new ADUs in order to track how ADUs serve households of varying sizes and in turn impact housing choice.	Building & Planning Department	Mar-23	ADU permit application requirements updated and announced on Town website and at Town Hall.	High
Goal 2.3: Adopt an ordinance to allow up to two detached ADUs on lots two acres and larger.				
Action 2.3 (a): Review best practices and sample ordinance language for similar multiple detached ADU programs in jurisdictions of similar size and make up in the ABAG region and throughout the state.	Building & Planning Department	Jan-25	Completed assessment of pros/cons of multiple attached or detached ADU programs in similar jurisdictions in the ABAG region and CA.	Mid
Action 2.3 (b): Based on the findings of Action 2.3(a), draft potential ordinance language facilitating allowing a maximum of two detached ADUs on lots two acres and larger and conduct community outreach for feedback.	Building & Planning Department	Jun-25	Conduct robust community outreach and education to gain feedback. Draft potential ordinance language, if applicable.	Mid
Action 2.3 (c): Present to City Council for consideration and adoption, language allowing a maximum of two detached ADUs on lots two acres and larger.	Building & Planning Department and City Council	Jan-26	Adoption of ordinance update.	Mid
Goal 2.4: Create a program to encourage and expedite the conversion of pool houses, guest houses, and other accessory structures to recorded ADUs/JADUs.				

Housing Element Action Matrix				
	Town Lead	Time Frame	Milestone	Priority
Action 2.4 (a): Review best practices and sample ordinance language for similar accessory structure conversion programs in jurisdictions of similar size and make up in the ABAG region and throughout the state.	Building & Planning Department	Jan-25	Completed assessment of pros/ cons of accessory structure conversion programs in similar jurisdictions in the ABAG region and CA.	Mid
Action 2.4 (b): Based on the findings of Action 2.4 (a), draft potential ordinance language facilitating and providing development standard flexibility for such conversions and conduct community outreach for feedback.	Building & Planning Department	Jun-25	Draft potential ordinance language and robust community outreach.	Mid
Action 2.4 (c): Present to City Council for consideration and adoption, language amending chapter 17.52 (Accessory Dwelling Units) of the Hillsborough Municipal Code expediting the conversion of pool house, guest house, and similar accessory structures into recorded ADUs.	Building & Planning Department and City Council	Jan-26	Adoption of ordinance update.	Mid
Action 2.4 (d): Based on the findings of Action 2.4 (a) and Action 2.4 (c), develop an expedited conversion program and related educational and outreach campaign to make residents aware of the benefits of conversion and present to Council for consideration and ordinance adoption.	Building & Planning Department and City Council	Jan-26	Adoption of ordinance update.	Mid

Housing Element Action Matrix				
	Town Lead	**Time Frame**	**Milestone**	**Priority**
Goal 2.5: Require all future pool house, guest house, and similar development to be constructed to the standards of an ADU to accommodate future conversion.				
Action 2.5 (a): Review best practices and sample ordinance language for similar accessory structure requirements in jurisdictions of similar size and make up in the ABAG region throughout the state.	City Attorney and Building & Planning Department	Jan-25	Completed assessment of pros/cons of accessory structure requirements in similar jurisdictions in the ABAG region and CA.	Mid
Action 2.5 (b): Based on the findings of Action 2.5(a), draft potential ordinance language requiring pool house, guest house, and similar accessory structures to be constructed for use as and recorded as an ADU and conduct community outreach for feedback.	Building & Planning Department and City Manager's Office	Jun-25	Conduct robust community outreach and education to gain feedback. Draft potential ordinance language, if applicable.	Mid
Action 2.5 (c): Present to City Council for consideration and adoption, language amending chapter 17.52 (Accessory Dwelling Units) of the Hillsborough Municipal Code to requiring pool house, guest house, and similar accessory structures to be constructed for use as and recorded as an ADU.	Building & Planning Department and City Council	Jan-26	Adoption of ordinance update, if applicable.	Mid
Goal 2.6: Create a retroactive permitting program for existing, unpermitted ADUs and JADUs.				
Action 2.6 (a): Establish an ADU/JADU Amnesty Program to allow eligible properties to legalize existing ADUs that were constructed without a permit.	City Attorney and Building & Planning Department	Jan-25	ADU Amnesty Program in place and community education.	Mid
Goal 2.7: Via 21 Elements, coordinate with San Mateo County jurisdictions on facilitating ADU Development.				
Action 2.7 (a): Work with 21 Elements and San Mateo County to provide property tax relief when ADU/JADUs are constructed.	Building & Planning Department, City Attorney, Finance Department, and City Manager's Office	Jan-27	Form an ADU working group through 21 Elements and San Mateo County that focuses on facilitating ADU development through expedited processing and tax relief.	Low
Action 2.7 (b): Support the creation of a county wide nonprofit to increase ADU production.	Building & Planning Department, City Attorney, City Manager's Office, and San Mateo County	Jan-27	Form an ADU working group through 21 Elements and San Mateo County that focuses on facilitating ADU development through expedited processing and tax relief.	Low
Goal 2.8: Conduct an ADU education and outreach campaign.				
Action 2.8 (a): Enhance awareness and understanding of what ADUs are, how residents can build them, and how residents can receive retroactive permits for them.	Building & Planning Department and City Manager's Office	Quarterly	Include information about what ADUs are, how residents can build them, and how residents can receive retroactive permits for them (Goal 2.6) in the Town's communications.	Mid

Housing Element Action Matrix				
	Town Lead	Time Frame	Milestone	Priority
Action 2.8 (b): Establish awareness and understanding of the Housing Choice Fund as a funding tool to support deed restricted affordable housing.	Building & Planning Department and City Manager's Office	Bi-annually	Advertise the availability of Housing Choice Fund dollars for the development of ADUs that are deed restricted affordable (Goal 1.6) in the Town's communications.	Low
Action 2.8 (c): In partnership with HIP Housing, promote their landlord-tenant match program.	Building & Planning Department and City Manager's Office	Bi-annually	Advertise the landlord tenant match program in the Town's communications.	Low
Action 2.8 (d): Enhance awareness of the Town's partnership with the County of San Mateo's Home for All initiative and the Second Unit Resource Center which provides information and tools to make it easier for homeowners to build accessory dwelling units.	Building & Planning Department and City Manager's Office	Jun-23	Update the Town's website to include information and resources.	Mid
Action 2.8 (e): Enhance the Town's ADU/JADU Information and Resources webpage on the Town's website.	Building & Planning Department and City Manager's Office	Jun-23	Update the Town's ADU/ JADU Information and Resources webpage to include changes to regulations and incentives.	Mid
Action 2.8 (f): Establish an ADU/JADU guidebook to help walk residents through the ADU/JADU permitting process.	Building & Planning Department	Jan-25	Final document ADU/JADU guidebook.	Mid
Action 2.8 (g): Develop an ADU informational video and share it via the Town's social media channels.	Building & Planning Department and City Manager's Office	Jan-23	ADU informational video is developed and shared via social media.	Mid
Action 2.8 (h): Conduct a series of interviews with ADU owners explaining their positive experience constructing and renting their ADU and encouraging other residents to do the same and share the interviews with the public via the Town's website and social media channels.	Building & Planning Department and City Manager's Office	Jun-23	Interviews are posted on the Town's website and social media.	Mid
Goal 2.9: Monitor ADU production and utilization and trigger mid-cycle adjustments as needed.				
Action 2.9 (a): Establish an ADU monitoring program that tracks the number of ADUs permitted, the number of ADUs rented / used for housing in the community, and the rental rate ADUs are offered for.	Building & Planning Department and City Council	Jun-23	ADU monitoring program is established and Building & Planning Department staff person assigned as responsible for tracking.	High
Action 2.9 (b): Include the annual results of the ADU monitoring program in the Town's Annual Progress Report for HCD in order to prepare for mid-cycle adjustment assessment conducted every two years.	Building & Planning Department and City Council	Annually	Results of the ADU monitoring program included in the Town's Annual Progress Report for HCD and presented to the City Council.	High

Housing Element Action Matrix				
	Town Lead	**Time Frame**	**Milestone**	**Priority**
Action 2.9 (c): Every two years conduct a mid-cycle adjustment assessment of the results of the ADU monitoring program and trigger tiered adjustments as needed and as detailed below. Tier I. If the results reveal the Town is behind in its projections for ADU production, occupancy, and rental rates by up to 50 percent in RHNA Cycle 6 years 1-3 or by up to 30 percent in years 4-8, the Town will enhance ADU outreach and increase the amount of Housing Choice Fund dollars available to subsidize the construction of deed restricted affordable housing. Tier II. If the results reveal the Town is behind in its projections for ADU production, occupancy, and rental rates by more than 50 percent in RHNA Cycle 6 years 1-3 or by more than 30 percent in years 4-8, the Town will take action under the no net loss statute and identify additional housing opportunity sites to accommodate housing development at a housing density of 20 dwelling units per acre or increase density allowed at existing opportunity sites.	Building & Planning Department and City Council	Bi-annually	Mid-cycle adjustment triggered as appropriate.	High
Policy 3: Facilitate Housing Development on Public, Commercial, Nonprofit, and Institutionally Owned Sites				
Goal 3.1: Monitor the disposition of all publicly owned land for potential future use for housing development.				
Action 3.1 (a): Fund and conduct a Town-owned property study to identify those properties which may be suitable for future redevelopment for housing.	Building & Planning Department, City Manager's Office, and City Council	Jan-26	Completed feasibility assessment.	Mid
Action 3.1 (b): Using the findings of the study referenced in Action 3.1 (a), develop a comprehensive program to support reuse of identified sites for housing purposes.	Building & Planning Department, City Manager's Office, and City Council	Jan-27	Completed community engagement process and creation of program with conceptual plans.	Mid
Goal 3.2: Encourage and support the use of private recreational and private school land for housing development to accommodate housing choice throughout Hillsborough.				
Action 3.2 (a): Provide staff support and community engagement facilitation to support development of multi-family housing units at the identified housing opportunity sites; Nueva private school and the Burlingame Country Club.	Building & Planning Department, City Manager's Office, and City Council	Case-by-case basis	Housing is developed, in alignment with the Housing Element, at Nueva private school and the Burlingame Country Club.	Mid
Goal 3.3: Facilitate the development of housing at the Town Hall Campus.				
Action 3.3 (a): Refine the recently completed study of the Town Hall Campus site to reflect the 16 units of housing proposed in this Housing Element.	Building & Planning Department, City Manager's Office, and City Council	Jun-23	Refined Town Hall Campus Study presented to City Council and public.	High

Housing Element Action Matrix				
	Town Lead	Time Frame	Milestone	Priority
Action 3.3 (b): Conduct extensive public outreach to develop a community driven vision for the Town Hall Campus, including the 16 units of housing proposed in this Housing Element.	Building & Planning Department, City Manager's Office, and City Council	Jul-Nov-2023	A minimum of three public workshops conducted to develop vision for Town Hall Campus.	High
Action 3.3 (c): Using the findings of the refined study referenced in Action 3.3 (a) and community driven visioning process referenced in Action 3.3 (b), develop a comprehensive Town Hall Campus Redevelopment Program to ensure redevelopment of the site via a public-private partnership during the RHNA 6 Cycle. The comprehensive program will include an overview of team structure, available revenues and gaps, approvals required, phasing strategy, and partnership plan.	Building & Planning Department, City Manager's Office, and City Council	Mar-24	Town Hall Campus Redevelopment Program presented to City Council and public.	Mid
Action 3.3 (d): Amend the zoning for the Town Hall Campus to permit development of housing 'by right' within the time limits required by State law.	City Attorney and Building & Planning Department	Jan-24	Zoning ordinance amendment adopted.	High
Action 3.3 (e): Comply with the Surplus Lands Act by either issuing a Request for Qualifications and negotiating directly with an affordable housing developer for development of a project meeting the requirements of Government Code Section 37364 and declaring the property "exempt surplus;" or issuing a Notice of Availability as required by the Surplus Lands Act and conducting negotiations as required by the Act.	Building & Planning Department, City Manager's Office, and City Council	Apr-24	Request for Qualifications or Notice of Availability published.	Mid
Action 3.3 (f): Enter into an exclusive negotiating agreement with the proposed developer.	Building & Planning Department, City Manager's Office, and City Council	Jul-24	Exclusive negotiating agreement entered into.	Mid
Action 3.3 (g): Complete design review of the proposed development and approve a development and disposition agreement with the proposed developer, including any proposed City assistance. If the property is not exempt surplus property, provide the development and disposition agreement to HCD prior to approval. Ensure that a covenant is recorded as required by the Surplus Lands Act.	Building & Planning Department, City Manager's Office, and City Council	Oct-25	Town Hall development approved by City Council..	Mid
Action 3.3 (h): Monitor development of the property to ensure that housing is constructed as agreed-upon in the development and disposition agreement.	Building & Planning Department	Bi-Monthly	Housing is constructed as agreed-upon in the development and disposition agreement.	Low

Housing Element Action Matrix				
	Town Lead	**Time Frame**	**Milestone**	**Priority**
Goal 3.4: Facilitate the development of housing at the Tobin Clark housing opportunity site.				
Action 3.4 (a): Release a request for proposals to study the Tobin Clark property and develop conceptual plans to accommodate the 100 units of housing proposed in this Housing Element.	Building & Planning Department, City Manager's Office, and City Council	May-23	Tobin Clark study presented to City Council and public.	High
Action 3.4 (b): Conduct extensive public outreach to develop a community driven vision for the Tobin Clark property, including the 100 units of housing proposed in this Housing Element.	Building & Planning Department, City Manager's Office, and City Council	Jun-Oct-2023	A minimum of three public workshops conducted to develop vision for Tobin Clark.	High
Action 3.4 (c): Using the findings of the study referenced in Action 3.4 (a) and community driven visioning process referenced in Action 3.4 (b), develop a comprehensive Tobin Clark Development Program to ensure redevelopment of the site via a public-private partnership during the RHNA 6 Cycle. The comprehensive program will include an overview of team structure, available revenues and gaps, approvals required, phasing strategy, and partnership plan.	Building & Planning Department, City Manager's Office, and City Council	Feb-24	Tobin Clark Redevelopment Program presented to City Council and public.	Mid
Action 3.4 (d): Amend the zoning for the Tobin Clark property to permit development of housing 'by right' within the time limits required by State law.	City Attorney and Building & Planning Department	Jan-24	Zoning ordinance amendment adopted.	High
Action 3.4 (e): Comply with the Surplus Lands Act by either issuing a Request for Qualifications and negotiating directly with an affordable housing developer for development of a project meeting the requirements of Government Code Section 37364 and declaring the property "exempt surplus;" or issuing a Notice of Availability as required by the Surplus Lands Act and conducting negotiations as required by the Act.	Building & Planning Department, City Manager's Office, and City Council	Apr-24	Request for Qualifications or Notice of Availability published.	Mid
Action 3.4 (f): Enter into an exclusive negotiating agreement with the proposed developer.	Building & Planning Department, City Manager's Office, and City Council	Jul-24	Exclusive negotiating agreement entered into.	Mid
Action 3.4 (g): Complete design review of the proposed development and approve a development and disposition agreement with the proposed developer, including any proposed City assistance. If the property is not exempt surplus property, provide the development and disposition agreement to HCD prior to approval. Ensure that a covenant is recorded as required by the Surplus Lands Act.	Building & Planning Department, City Manager's Office, and City Council	Oct-25	Town Hall development approved by City Council..	Mid
Action 3.4 (h):Monitor development of the property to ensure that housing is constructed as agreed-upon in the development and disposition agreement.	Building & Planning Department	Bi-Monthly	Housing is constructed as agreed-upon in the development and disposition agreement.	High

Housing Element Action Matrix				
	Town Lead	**Time Frame**	**Milestone**	**Priority**
Policy 4: Ensure Responsible Development in Wildland Urban Interface (WUI) Areas				
Goal 4.1: Continue to support the Central County Fire District (CCFD) WUI Home Inspection Program				
Action 4.1 (a): Enhance communications to residents regarding their required participation in the WUI Inspection Program.	CCFD and City Manager's Office	Annually	Host annual resident workshops. Continue to promote WUI Home Inspection Program through education and outreach materials distributed through the Town's website, Quarterly newsletter, and weekly e-announcements.	Low
Action 4.1 (b): Require all new proposed landscape plans on properties in designated WUI area to submit a vegetation management plan and receive approval by CCFD.	Building & Planning Department and CCFD	Project-by- project basis	Continue to facilitate expedited review and approval by CCFD of landscape plans in WUI areas.	Low
Goal 4.2: Continue to support community participation in the National Firewise USA® Recognition Program of the National Fire Protection Association (NFPA)				
Action 4.2 (a): Maintain the Town's "Firewise Hillsborough" webpage to provide residents with valuable information about how to stay wildfire ready.	CCFD and City Manager's Office	Ongoing, as-needed	Provide information on the Town's website, Quarterly newsletter, and weekly e-announcements.	Low
Action 4.2 (b): Provide a link on the Town's Firewise Hillsborough webpage to access information on which residential property insurance companies may be currently offering discounts for fire hardened homes.	CCFD and City Manager's Office	Ongoing, as-needed	Provide information on the Town's website, Quarterly newsletter, and weekly e-announcements.	Low
Action 4.2 (c): Maintain the Town's status as a Firewise USA Community, as recognized by the National Fire Protection Association (NFPA).	CCFD and City Manager's Office	Annually	Hillsborough Firewise recognized by the National Fire Protection Association (NFPA).	Low
Goal 4.3: Establish and enforce safety standards for structures and landscaping in WUI areas				
Action 4.3 (a): The Central County Fire Department will review proposed plans for all new buildings and major additions to ensure the construction complies with fire access requirements and make recommendations for modifications to reduce fire hazards.	Building & Planning Department and CCFD	Ongoing, project-by- project basis	All new buildings and major additions receive approval for compliance with fire access requirements.	Low
Policy 5: Establish and Strengthen Opportunities for Rental Tenancies in ADUs and throughout Hillsborough.				
Goal 5.1: Add a Tenant/Landlord information page to the Town website				
Action 5.1 (a): Promote partnership with HIP Housing to facilitate the rental of ADU and JADU units.	City Manager's Office	Jan-23	Provide information on the Town's website, Quarterly newsletter, and weekly e-announcements.	High
Action 5.1 (b): Provide a link on the Town's Tenant/ Landlord webpage to HIP Housing's monthly, multi-lingual, home sharing fliers.	City Manager's Office	Jan-23	Provide information on the Town's website, Quarterly newsletter, and weekly e-announcements.	High

Housing Element Action Matrix				
	Town Lead	**Time Frame**	**Milestone**	**Priority**
Action 5.1 (c): Encourage landlords to accept Section 8 and Housing Choice Vouchers by providing information on the Town's Tenant/Landlord website regarding the programs and how to participate.	City Manager's Office, Building & Planning Department, and Finance Department	Jan-23	Provide information on the Town's website, Quarterly newsletter, and weekly e-announcements.	High
Action 5.1 (d): Establish a relationship with the California Apartment Association (CAA) and work with their education team to sponsor and promote fair housing training for Landlords via the Town's Tenant/Landlord website.	City Manager's Office	Jan-27	Partner with HIP Housing and CAA to provide coordinated education and resources for landlords with the Town's Tenant/ Landlord website.	Mid
Goal 5.2: Support the Human Investment Project (HIP Housing) Home Sharing, Self-Sufficiency, and Property programs				
Action 5.2 (a): Continue annual grant award to the Human Investment Project (HIP housing), HEART of San Mateo County, Life Moves, and the County of San Mateo Human Services (see action 6.2(a))	City Manager's Office	Annually	Annual Budget line item.	Low
Action 5.2 (b): Distribute HIP Housing's monthly, multi- lingual home sharing fliers directly to City Council, Board, and Commission members, and public and private schools.	City Manager's Office	Monthly	Provide information on the Town's website, Quarterly newsletter, and weekly e-announcements.	Low
Action 5.2 (c): Post HIP Housing's monthly, multi-lingual home sharing fliers at Town Hall.	Building & Planning Department and City Manager's Office	Annually	Host hybrid workshop for Hillsborough residents and employees to provide education and outreach about the HIP Housing home sharing program.	Low
Action 5.2 (d): Provide a link on the Town's Housing Resources webpage to HIP Housing's monthly, multi-lingual home sharing fliers.	City Manager's Office	Monthly	Provide information on the Town's website, Quarterly newsletter, and weekly e-announcements.	Low
Goal 5.3: Establish and continue partnerships with local nonprofits for tenant outreach and counseling.				
Action 5.3 (a): Maintain the Town's relationship with Project Sentinel and refer tenants to their no-fee services.	Building & Planning Department and City Manager's Office	Ongoing, as-needed	Provide information on the Town's website, Quarterly newsletter, and weekly e-announcements.	Low
Action 5.3 (b): Ensure access to the Town's housing-related communication materials through translation of materials into multiple languages including Spanish and Chinese, making materials accessible to those with disabilities, and sharing information with community organizations, such as legal service or public health providers. All communication plans would include strategies to reach groups with disproportionate housing needs.	Building & Planning Department and City Manager's Office	Ongoing, as-needed	Partner with 21 Elements and San Mateo County to provide information about available translation and accessibility resources and tools. Provide information on the Town's website, Quarterly newsletter, and weekly e-announcements.	Low

Housing Element Action Matrix				
	Town Lead	**Time Frame**	**Milestone**	**Priority**
Goal 5.4: Adopt an anti-harassment ordinance and a right-to-counsel policy				
Action 5.4 (a): Review best practices and sample ordinance language for anti-harassment ordinances and right-to-counsel policies in jurisdictions in the ABAG region and throughout the state.	City Attorney and City Manager's Office	Jan-25	Develop a best practices framework for anti-harassment ordinances and right-to-counsel policies.	Low
Action 5.4 (b): Draft potential ordinance language and conduct outreach to tenants, landlords, community members and tenant/landlord organizations for feedback.	City Attorney and City Manager's Office	Jun-25	Conduct robust community outreach and education to gain feedback. Draft potential ordinance language, if applicable.	Low
Action 5.4 (c): Based on the outcomes of Actions 6.4 (a) through 6.4 (c), present to City Council for consideration and adoption, language establishing an anti-harassment ordinance and right-to- counsel policy.	City Attorney, City Manager's Office, and City Council	Jan-26	Adoption of ordinance update, if applicable.	Low
Policy 6: Actively Participate in Addressing the Housing Needs of the Region				
Goal 6.1: Continue participation in and support for the 21 Elements project				
Action 6.1 (a): Via 21 Elements, participate in a multi-city nexus and feasibility study to adopt housing impact fees and inclusionary requirements.	Building & Planning Department and City Manager's Office	Annually	Form a working group through 21 Elements and San Mateo County that evaluates impact fees and inclusionary requirements.	Low
Action 6.1 (b): Partner with the 21 Elements Jurisdictions to assess the viability of sharing housing staff to support inclusionary zoning, affordable housing, and other related projects.	Building & Planning Department and City Manager's Office	Quarterly	Form a working group through 21 Elements and San Mateo County that evaluates sharing housing staff.	Low
Goal 6.2: Provide financial support to local housing, homelessness, and mental health support programs				
Action 6.2 (a): Continue annual grant award to the Human Investment Project (HIP housing)	City Manager's Office and City Council	Annually	Annual Budget line item.	Low
Action 6.2 (b): Continue financial support for the 21 Elements project	City Manager's Office and City Council	Annually	Annual Budget line item.	Low
Action 6.2 (c): Develop and adopt a Town philanthropy policy which establishes consistency in giving to local housing, homelessness, and mental health support programs whose organizational missions align with the Town's value statement.	City Manager's Office and City Council	Jan-26	Adopted Town philanthropy policy.	Low
Action 6.2 (d): During the annual Town budget development process, assess the availability of funds for contribution to local housing, homelessness, and mental health support programs whose organizational missions align with the Town's value statement.	City Manager's Office and City Council	Annually	Annual Budget adopted.	Low

Housing Element Action Matrix				
	Town Lead	**Time Frame**	**Milestone**	**Priority**
Goal 6.3: Report annually to City Council on the Town's progress in meeting the RHNA Cycle 6 housing allocation				
Action 6.3 (a): Planning staff generate the Town's Annual Progress Report (APR) to the California Department of Housing and Community Development (HCD) outlining details of housing development occurring in Town during the previous calendar year and progress towards achieving housing goals	Building & Planning Department	Annually	Annual Progress Report (APR) prepared for submittal to HCD.	Low
Action 6.3 (b): Present the Annual APR to the City Council	Building & Planning Department	Annually	Annual Progress Report (APR) accepted by City Council for submittal to HCD.	Low
Goal 6.4: Monitor the opportunity sites inventory and the Town's progress in meeting RHNA.				
Action 6.4 (a): Establish a monitoring program that collects data every two years to: •Ensure no shortfall is created during the Housing Element planning period, in compliance with the No Net Loss Law. •Track the adequacy of infrastructure to serve new and existing housing including water, sewer, and dry utility capacity. •Monitor unit count and income/affordability assumed on parcels included in the sites inventory to inform no net loss findings. •Monitor actual units constructed and income/affordability when parcels are developed, •Monitor net change in capacity and the ability of the remaining housing opportunity sites to meet remaining RHNA requirements to inform no net loss findings. •Make the results of the monitoring program available to the public through an online dashboard.	Building & Planning Department	Jun-23	Monitoring program is established and Building & Planning Department staff person assigned as responsible for tracking.	High
Action 6.4 (b): Include the results of the monitoring program in the Town's Annual Progress Report for HCD in order to implement mid-cycle adjustments, as needed.	Building & Planning Department	Annually	Monitoring program results included in APR and staff recommendation for mid-cycle adjustments presented to the City Council.	Mid

Housing Element Action Matrix				
	Town Lead	**Time Frame**	**Milestone**	**Priority**
Action 6.4 (c): Every two years conduct a mid-cycle adjustment assessment of the results of the monitoring program and trigger tiered adjustments as needed and as detailed below. Tier I. If the results reveal the Town is behind in its projections for housing production, occupancy, and rental rates by up to 50 percent in RHNA Cycle 6 years 1-3 or by up to 30 percent in years 4-8, the Town will enhance housing development related outreach and increase the amount of Housing Choice Fund dollars available to subsidize the construction of deed restricted affordable housing. Tier II. If the results reveal the Town is behind in its projections for housing production, occupancy, and rental rates by more than 50 percent in RHNA Cycle 6 years 1-3 or by more than 30 percent in years 4-8, the Town will take action under the no net loss statute and identify additional housing opportunity sites to accommodate housing development at a housing density of 20 dwelling units per acre or increase density allowed at existing opportunity sites.	Building & Planning Department and City Council	Bi-annually	Mid-cycle adjustment triggered as appropriate.	High
Policy 7: Affirmatively Further Fair Housing Opportunities				
Goal 7.1: Eliminate discrimination in housing based on age, race, color, religion, sex, marital status, national origin, ancestry, or occupation				
Action 7.1 (a): Support fair access to housing for all persons without regard to race, color, religion, sex, marital status, national origin, or ancestry. Assemble and promote the distribution of information to landlords regarding fair housing.	Building & Planning Department and City Manager's Office	Annually	Annually contract with a fair housing service provider to promote open housing practices for residents, and to facilitate communication between tenants and landlords.	Low
Action 7.1 (b): Assemble and promote the distribution of information to landlords regarding fair housing.	Building & Planning Department and City Manager's Office	Annually	Continue to provide resources for bi- lingual fair housing brochures in a variety of public locations, including Town Hall.	Low
Action 7.1 (c): Involve Project Sentinel to aid in housing-related problem resolution.	Building & Planning Department and City Manager's Office	Project-by- project basis	Develop a housing- related referral protocol with Project Sentinel.	Low
Action 7.1 (d): Continue to designate the City Attorney as the appropriate City official to receive and administer complaints related to housing discrimination.	City Attorney and City Manager's Office	Annually	Annually designate City Attorney as the City official to manage housing discrimination complaints.	Low

Housing Element Action Matrix				
	Town Lead	**Time Frame**	**Milestone**	**Priority**
Action 7.1 (e): Continue to implement Chapter 17.42 of the Zoning Ordinance (Requests for Reasonable Accommodation) to comply with the Americans with Disabilities Act (ADA).	Building & Planning Department and City Attorney	Case-by-case basis	Provide information about Requests for Reasonable Accommodation on the Town's website and Quarterly newsletter.	Low
Action 7.1 (f): Provide maximum flexibility in the development of housing for persons with disabilities.	City Manager's Office and Building & Planning Department	Jan-24	Establish an Administrative Exceptions process to allow for ministerial approval of minor variances for the development of housing for persons with disabilities.	High
Action 7.1 (g): Ensure that information related to fair housing laws is easily available on the Town's website and at key Town facilities, including the Town Hall Campus and Police Station .	Building & Planning Department, Police Department, and City Attorney	Quarterly	Provide information about fair housing laws on the Town's website and Quarterly newsletter.	Mid
Goal 7.2: Proactively increase access to affordable housing options for historically marginalized and underrepresented groups				
Action 7.2 (a): Work with HIP Housing and other self-sufficiency programs to market ADUs to the disability community and non-English speakers, including new-immigrant and refugee communities.	City Manager's Office and Building & Planning Department	Monthly	Partner with programs to provide information on the Town's website, Quarterly newsletter, and weekly e-announcements.	Mid
Action 7.2 (b): Work with HIP Housing and other self-sufficiency programs to make available paper and digital versions of multi-lingual applications and to make all websites containing application information accessible.	City Manager's Office and Building & Planning Department	Monthly	Partner with programs to provide information on the Town's website, Quarterly newsletter, and weekly e-announcements.	Mid
Goal 7.3: Conduct an AFFH Education and Outreach Campaign				
Action 7.3 (a): Enhance awareness and understanding of what AFFH is and how it impacts housing choice in Hillsborough.	City Manager's Office and Building & Planning Department	Quarterly	Include information about AFFH and how it impacts housing choice in Hillsborough in the Town's e-newsletters.	Mid
Action 7.3 (b): Display information about the availability of reasonable accommodations at the public information counter in the Planning and Building Division and ensure that the information is easily accessible on the Town's website.	City Manager's Office and Building & Planning Department	Jun-23	Reasonable Accommodations Fact Sheet and Approval Guide made available at the public information counter and on the Town's website.	High
Action 7.3 (c): In partnership with Project Sentinel and the Legal Aid Society of San Mateo County, promote available housing issue resolution services and fair housing information.	City Manager's Office and Building & Planning Department	Bi-annually	Advertise available services and fair housing information in the Town's mailed newsletter.	Low
Action 7.3 (d): Ensure that information related to fair housing laws is easily available on the Town's website and at key Town facilities, including Town Hall and the Police Department.	City Manager's Office and Building & Planning Department	Jun-23; Annually	Update the Town's website to include information regarding fair housing law. Annually work with Project Sentinel to make flyers and literature regarding fair housing law available at key Town facilities.	High; Low

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Appendix C: Air Quality, Energy, and Greenhouse Gas Analysis Technical Appendices

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Hillsborough Housing Element Update
Town of Hillsborough, California

Appendix D.1: Energy Consumption Information
Prepared by: MIG, Inc.
September 2023

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Sheet 2 EMFAC2021 San Mateo County Fuel Efficiency Estimates for 2020 and 2040

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Hillsborough Housing Element Update
Town of Hillsborough, California
Appendix D.1: Energy Consumption Information

Sheet 1: Energy Consumption Comparison Tables

Table 1: Estimated Operational Change in Vehicle Fuel Consumption (2020 vs. 2040)					
Metric	**VMT and Vehicle Fuel Consumption**			**Fuel Consumption Comparison**	
	2020	**2040 NP**	**2040 HEU**	**Change 2020 and 2040 HEU**	**Change 2040 NP and 2040 HEU**
Total Diesel VMT	11,571	10,012	11,210	-362	1,198
Total Gasoline VMT	262,670	249,104	278,901	16,231	29,797
Total Electric VMT	9,087	31,310	35,055	25,969	3,745
Total VMT (miles/day)	283,328	290,426	325,166	41,838	34,740
Diesel Fuel Efficiency (miles/gal)	8.78	11.16	11.16	2.37	0
Gasoline Fuel Efficiency (miles/gal)	23.42	29.35	29.35	5.93	0
Electric Fuel Efficiency (miles per kWh)	2.71	1.99	1.99	-0.71	0
Total Diesel Consumption (Gallons/day)	1,317	898	1,005	-312	107
Total Gasoline Consumption (Gallons/day)	11,214	8,486	9,501	-1,712	1,015
Total Electricity Consumption (kWh/day)	3,357	15,704	17,582	14,225	1,878
Total Electricity Consumption (kWh/year)	1,225,276	5,731,826	6,417,452	5,192,176	685,626
Total Petroleum Consumption (Gallons/day)	12,531	9,384	10,506	-2,025	1,122
Population	11,410	11,410	12,802	1,392	1,392
Fuel Consumption Efficiency (Gallons/day/capita)	1.10	0.82	0.82	-0.28	-0.002

Hillsborough Housing Element Update
Town of Hillsborough, California
Appendix D.1: Energy Consumption Information

Sheet 2: Average Fuel Efficiency - San Mateo County

EMFAC2021 San Mateo County Fuel Efficiency Estimates for 2020 and 2040

Table 1: 2020 San Mateo County Average Vehicle Fuel Efficiency Gasoline)

Vehicle Class	Population	Vehicle Miles Travelled Per Day	Gallons Per Day	Miles Per Gallon
HHDT	4.26	539.82	146.09	3.70
LDA	247,741.73	7,597,957.56	268,540.76	28.29
LDT1	23,590.25	652,581.95	27,302.00	23.90
LDT2	109,886.46	3,487,434.73	153,003.35	22.79
LHDT1	9,054.51	308,144.05	33,285.50	9.26
LHDT2	1,057.81	33,453.70	4,099.03	8.16
MCY	10,406.93	53,049.19	1,324.82	40.04
MDV	61,130.96	1,952,189.69	103,035.78	18.95
MH	725.85	5,414.65	1,228.80	4.41
MHDT	729.28	36,560.18	8,078.66	4.53
OBUS	258.39	15,309.29	3,234.81	4.73
SBUS	50.56	2,658.33	274.90	9.67
UBUS	60.72	4,128.67	502.31	8.22
TOTAL	464,697.71	14,149,421.81	604,056.80	23.42

Table 2: 2020 San Mateo County Average Vehicle Fuel Efficiency (Diesel)

Vehicle Class	Population	Vehicle Miles Travelled Per Day	Gallons Per Day	Miles Per Gallon
HHDT	1264.83	117718.73	23169.41	5.08
LDA	996.86	24543.36	585.09	41.95
LDT1	10.51	142.84	5.94	24.06
LDT2	412.62	13496.58	443.01	30.47
LHDT1	3318.86	110320.95	7078.77	15.58
LHDT2	1294.75	45726.00	3563.97	12.83
MCY	0.00	0.00	0.00	0.00
MDV	930.53	31736.51	1342.95	23.63
MH	249.43	2398.51	255.82	9.38
MHDT	4212.92	171409.08	20720.33	8.27
OBUS	1002.86	73662.82	9256.60	7.96
SBUS	166.17	3809.24	474.09	8.03
UBUS	339.45	28352.37	4057.48	6.99
TOTAL	14199.78	623316.99	70953.47	8.78

Table 3: 2040 San Mateo County Average Vehicle Fuel Efficiency (Gasoline)

Vehicle Class	Population	Vehicle Miles Travelled Per Day	Gallons Per Day	Miles Per Gallon
HHDT	1.78	135.47	30.11	4.50
LDA	250,161.81	5,949,168.62	163,321.55	36.43
LDT1	31,686.32	711,988.59	22,694.47	31.37
LDT2	266,089.17	6,153,290.52	203,060.56	30.30
LHDT1	12,781.20	306,741.81	27,536.54	11.14
LHDT2	1,438.85	34,024.85	3,430.67	9.92
MCY	22,311.16	92,748.61	2,184.35	42.46
MDV	153,195.72	3,575,833.74	142,678.68	25.06
MH	1,291.63	10,018.49	2,265.26	4.42
MHDT	794.50	32,719.63	6,051.49	5.41
OBUS	178.14	5,870.99	1,072.62	5.47
SBUS	92.13	3,827.61	346.45	11.05
UBUS	61.32	4,000.61	396.33	10.09
TOTAL	740,083.73	16,880,369.51	575,069.09	29.35

Table 4: 2040 San Mateo County Average Vehicle Fuel Efficiency (Diesel)

Vehicle Class	Population	Vehicle Miles Travelled Per Day	Gallons Per Day	Miles Per Gallon
HHDT	1221.84	118568.14	17515.17	6.77
LDA	181.88	3702.31	67.57	54.79
LDT1	0.34	8.08	0.27	30.17
LDT2	984.60	23202.24	572.68	40.52
LHDT1	7547.06	184763.56	11040.28	16.74
LHDT2	3572.86	84901.55	5924.56	14.33
MCY	0.00	0.00	0.00	0.00
MDV	1638.02	38378.08	1235.97	31.05
MH	753.54	5325.36	570.70	9.33
MHDT	3521.99	135686.12	14676.12	9.25
OBUS	1381.43	79199.25	8673.79	9.13
SBUS	127.84	2634.03	301.21	8.74
UBUS	24.83	2095.30	242.14	0.00
TOTAL	20956.21	678464.01	60820.46	11.16

Hillsborough Housing Element Update
Town of Hillsborough, California
Appendix D.1: Energy Consumption Information

EMFAC2021 San Mateo County Fuel Efficiency Estimates for 2020 and 2040

Table 5: 2020 San Mateo County Average Vehicle Fuel Efficiency (Electricity)

Vehicle Class	Population	Vehicle Miles Travelled Per Day	Energy Consumption (kWh/day)	Miles Per kWh
HHDT	0.00	0.00	0.00	0.00
LDA	16,183.00	472,384.26	175,225.52	2.70
LDT1	55.13	1,526.62	585.28	2.61
LDT2	395.90	8,152.96	2,596.04	3.14
LHDT1	0.00	0.00	0.00	0.00
LHDT2	0.00	0.00	0.00	0.00
MCY	0.00	0.00	0.00	0.00
MDV	353.69	7,393.11	2,395.91	3.09
MH	0.00	0.00	0.00	0.00
MHDT	0.00	0.00	0.00	0.00
OBUS	0.00	0.00	0.00	0.00
SBUS	0.00	0.00	0.00	0.00
UBUS	2.02	15.32	26.71	0.57
TOTAL	16,989.74	489,472.27	180,829.44	2.71

Table 6: 2040 San Mateo County Average Vehicle Fuel Efficiency (Electricity)

Vehicle Class	Population	Vehicle Miles Travelled Per Day	Energy Consumption (kWh/day)	Miles Per kWh
HHDT	394.96	33,628.28	62,755.04	0.54
LDA	43,000.89	1,041,008.03	388,030.46	2.68
LDT1	1,413.92	31,546.73	11,405.73	2.77
LDT2	16,060.56	274,712.37	98,040.68	2.80
LHDT1	9,267.25	293,604.05	192,386.14	1.53
LHDT2	2,302.73	70,466.44	45,438.52	1.55
MCY	0.00	0.00	0.00	0.00
MDV	12,825.75	224,626.99	81,627.97	2.75
MH	0.00	0.00	0.00	0.00
MHDT	2,474.67	115,950.70	126,667.05	0.92
OBUS	84.75	4,910.40	5,439.98	0.90
SBUS	90.33	3,059.99	3,223.56	0.95
UBUS	359.52	28,183.94	49,131.49	0.57
TOTAL	88,275.32	2,121,697.91	1,064,146.61	1.99

Source: EMFAC2021 (v1.0.2) Emissions Inventory
Region Type: Sub-Area
Region: San Mateo (SF)
Calendar Year: 2020
Season: Annual
Vehicle Classification: EMFAC2007 Categories

Region	Calendar Ye	Vehicle Cate	Model Year	Speed	Fuel	Population	Total VMT	CVMT	EVMT	Trips
San Mateo (	2020	HHDT	Aggregate	Aggregate	Gasoline	4.261641	539.8177	539.8177	0	85.26691
San Mateo (	2020	HHDT	Aggregate	Aggregate	Diesel	1264.827	117718.7	117718.7	0	13415.96
San Mateo (	2020	HHDT	Aggregate	Aggregate	Natural Gas	123.414	8593.127	8593.127	0	796.3688
San Mateo (	2020	LDA	Aggregate	Aggregate	Gasoline	242868.1	7500311	7500311	0	1142657
San Mateo (	2020	LDA	Aggregate	Aggregate	Diesel	996.865	24543.36	24543.36	0	4315.509
San Mateo (	2020	LDA	Aggregate	Aggregate	Electricity	11309.38	387273.4	0	387273.4	57026.05
San Mateo (	2020	LDA	Aggregate	Aggregate	Plug-in Hybri	4873.615	182757.2	97646.36	85110.82	20152.4
San Mateo (	2020	LDT1	Aggregate	Aggregate	Gasoline	23587.76	652528.7	652528.7	0	106369
San Mateo (	2020	LDT1	Aggregate	Aggregate	Diesel	10.50554	142.8432	142.8432	0	32.10177
San Mateo (	2020	LDT1	Aggregate	Aggregate	Electricity	52.6411	1477.544	0	1477.544	249.4129
San Mateo (	2020	LDT1	Aggregate	Aggregate	Plug-in Hybri	2.491174	102.3429	53.26908	49.0738	10.30101
San Mateo (	2020	LDT2	Aggregate	Aggregate	Gasoline	109543.1	3480182	3480182	0	522322
San Mateo (	2020	LDT2	Aggregate	Aggregate	Diesel	412.6233	13496.58	13496.58	0	1996.948
San Mateo (	2020	LDT2	Aggregate	Aggregate	Electricity	52.49314	1589.474	0	1589.474	269.9659
San Mateo (	2020	LDT2	Aggregate	Aggregate	Plug-in Hybri	343.4026	13816.1	7252.614	6563.483	1419.97
San Mateo (	2020	LHDT1	Aggregate	Aggregate	Gasoline	9054.511	308144	308144	0	134898.7
San Mateo (	2020	LHDT1	Aggregate	Aggregate	Diesel	3318.856	110321	110321	0	41747.03
San Mateo (	2020	LHDT2	Aggregate	Aggregate	Gasoline	1057.81	33453.7	33453.7	0	15759.79
San Mateo (	2020	LHDT2	Aggregate	Aggregate	Diesel	1294.752	45726	45726	0	16286.35
San Mateo (	2020	MCY	Aggregate	Aggregate	Gasoline	10406.93	53049.19	53049.19	0	20813.86
San Mateo (	2020	MDV	Aggregate	Aggregate	Gasoline	61130.96	1952190	1952190	0	289054.4
San Mateo (	2020	MDV	Aggregate	Aggregate	Diesel	930.5323	31736.51	31736.51	0	4507.83
San Mateo (	2020	MDV	Aggregate	Aggregate	Electricity	62.56878	1938.903	0	1938.903	324.2495
San Mateo (	2020	MDV	Aggregate	Aggregate	Plug-in Hybri	291.1262	11718.9	6264.697	5454.206	1203.807
San Mateo (	2020	MH	Aggregate	Aggregate	Gasoline	725.8476	5414.65	5414.65	0	72.61379
San Mateo (	2020	MH	Aggregate	Aggregate	Diesel	249.4283	2398.506	2398.506	0	24.94283
San Mateo (	2020	MHDT	Aggregate	Aggregate	Gasoline	729.2841	36560.18	36560.18	0	14591.52
San Mateo (	2020	MHDT	Aggregate	Aggregate	Diesel	4212.918	171409.1	171409.1	0	50599.04
San Mateo (	2020	MHDT	Aggregate	Aggregate	Natural Gas	34.90356	1629.658	1629.658	0	326.7787
San Mateo (	2020	OBUS	Aggregate	Aggregate	Gasoline	258.3864	15309.29	15309.29	0	5169.794
San Mateo (	2020	OBUS	Aggregate	Aggregate	Diesel	1002.856	73662.82	73662.82	0	9862.258
San Mateo (	2020	OBUS	Aggregate	Aggregate	Natural Gas	12.38082	723.6502	723.6502	0	110.1893
San Mateo (	2020	SBUS	Aggregate	Aggregate	Gasoline	50.55944	2658.325	2658.325	0	202.2378
San Mateo (	2020	SBUS	Aggregate	Aggregate	Diesel	166.1711	3809.244	3809.244	0	2406.157
San Mateo (	2020	SBUS	Aggregate	Aggregate	Natural Gas	5.251138	137.6816	137.6816	0	76.03648
San Mateo (	2020	UBUS	Aggregate	Aggregate	Gasoline	60.71861	4128.673	4128.673	0	242.8744
San Mateo (	2020	UBUS	Aggregate	Aggregate	Diesel	339.4498	28352.37	28352.37	0	1357.799
San Mateo (	2020	UBUS	Aggregate	Aggregate	Electricity	2.018703	15.3193	0	15.3193	8.074811
San Mateo (	2020	UBUS	Aggregate	Aggregate	Natural Gas	33.97487	1123.548	1123.548	0	135.8995

Energy Consumption	Fuel Consumption
0	0.14609
0	23.16941
0	1.898998
0	265.2977
0	0.585095
149519.5	0
25706	3.243043
0	27.30023
0	0.005936
570.454	0
14.82175	0.001774
0	152.7608
0	0.443011
613.668	0
1982.368	0.242581
0	33.2855
0	7.078769
0	4.099033
0	3.563973
0	1.324815
0	103.0358
0	1.342953
748.5766	0
1647.333	0.212098
0	1.228799
0	0.25582
0	8.078662
0	20.72033
0	0.236345
0	3.234814
0	9.256604
0	0.100839
0	0.274901
0	0.474094
0	0.025405
0	0.502309
0	4.057477
26.70528	0
0	0.19384

Source: EMFAC2021 (v1.0.2) Emissions Inventory
Region Type: Sub-Area
Region: San Mateo (SF)
Calendar Year: 2040
Season: Annual
Vehicle Classification: EMFAC2007 Categories

Region	Calendar Yea	Vehicle Cate	Model Year	Speed	Fuel	Population	Total VMT	CVMT	EVMT	Trips
San Mateo (	2040	HHDT	Aggregate	Aggregate	Gasoline	1.783269	135.4654	135.4654	0	35.67965
San Mateo (	2040	HHDT	Aggregate	Aggregate	Diesel	1221.836	118568.1	118568.1	0	15195.7
San Mateo (	2040	HHDT	Aggregate	Aggregate	Electricity	394.9608	33628.28	0	33628.28	3575.248
San Mateo (	2040	HHDT	Aggregate	Aggregate	Natural Gas	207.3822	13127.39	13127.39	0	1313.967
San Mateo (	2040	LDA	Aggregate	Aggregate	Gasoline	239013.4	5833280	5833280	0	1122617
San Mateo (	2040	LDA	Aggregate	Aggregate	Diesel	181.8771	3702.308	3702.308	0	800.93
San Mateo (	2040	LDA	Aggregate	Aggregate	Electricity	31852.52	875819.3	0	875819.3	151743.2
San Mateo (	2040	LDA	Aggregate	Aggregate	Plug-in Hybri	11148.36	281077	115888.3	165188.7	46098.48
San Mateo (	2040	LDT1	Aggregate	Aggregate	Gasoline	31069.93	705649.2	705649.2	0	142822.6
San Mateo (	2040	LDT1	Aggregate	Aggregate	Diesel	0.338084	8.083871	8.083871	0	1.593642
San Mateo (	2040	LDT1	Aggregate	Aggregate	Electricity	797.5262	22339.25	0	22339.25	3827.563
San Mateo (	2040	LDT1	Aggregate	Aggregate	Plug-in Hybri	616.3906	15546.84	6339.361	9207.479	2548.775
San Mateo (	2040	LDT2	Aggregate	Aggregate	Gasoline	259398.7	6086991	6086991	0	1210621
San Mateo (	2040	LDT2	Aggregate	Aggregate	Diesel	984.5963	23202.24	23202.24	0	4604.908
San Mateo (	2040	LDT2	Aggregate	Aggregate	Electricity	9370.138	179284.5	0	179284.5	44790.58
San Mateo (	2040	LDT2	Aggregate	Aggregate	Plug-in Hybri	6690.422	161727.6	66299.75	95427.83	27664.9
San Mateo (	2040	LHDT1	Aggregate	Aggregate	Gasoline	12781.2	306741.8	306741.8	0	190420.9
San Mateo (	2040	LHDT1	Aggregate	Aggregate	Diesel	7547.06	184763.6	184763.6	0	94932.53
San Mateo (	2040	LHDT1	Aggregate	Aggregate	Electricity	9267.246	293604	0	293604	129930
San Mateo (	2040	LHDT2	Aggregate	Aggregate	Gasoline	1438.845	34024.85	34024.85	0	21436.65
San Mateo (	2040	LHDT2	Aggregate	Aggregate	Diesel	3572.862	84901.55	84901.55	0	44942.11
San Mateo (	2040	LHDT2	Aggregate	Aggregate	Electricity	2302.726	70466.44	0	70466.44	30491.93
San Mateo (	2040	MCY	Aggregate	Aggregate	Gasoline	22311.16	92748.61	92748.61	0	44622.31
San Mateo (	2040	MDV	Aggregate	Aggregate	Gasoline	149035	3533747	3533747	0	692678.3
San Mateo (	2040	MDV	Aggregate	Aggregate	Diesel	1638.023	38378.08	38378.08	0	7583.677
San Mateo (	2040	MDV	Aggregate	Aggregate	Electricity	8665.033	163991.4	0	163991.4	41266.97
San Mateo (	2040	MDV	Aggregate	Aggregate	Plug-in Hybri	4160.719	102722.1	42086.51	60635.56	17204.57
San Mateo (	2040	MH	Aggregate	Aggregate	Gasoline	1291.629	10018.49	10018.49	0	129.2146
San Mateo (	2040	MH	Aggregate	Aggregate	Diesel	753.535	5325.357	5325.357	0	75.3535
San Mateo (	2040	MHDT	Aggregate	Aggregate	Gasoline	794.4966	32719.63	32719.63	0	15896.29
San Mateo (	2040	MHDT	Aggregate	Aggregate	Diesel	3521.987	135686.1	135686.1	0	42694.55
San Mateo (	2040	MHDT	Aggregate	Aggregate	Electricity	2474.672	115950.7	0	115950.7	33822.53
San Mateo (	2040	MHDT	Aggregate	Aggregate	Natural Gas	63.68302	2441.212	2441.212	0	647.6411
San Mateo (	2040	OBUS	Aggregate	Aggregate	Gasoline	178.1369	5870.986	5870.986	0	3564.164
San Mateo (	2040	OBUS	Aggregate	Aggregate	Diesel	1381.427	79199.25	79199.25	0	13446.95
San Mateo (	2040	OBUS	Aggregate	Aggregate	Electricity	84.74565	4910.403	0	4910.403	1695.591
San Mateo (	2040	OBUS	Aggregate	Aggregate	Natural Gas	22.09988	1276.064	1276.064	0	196.6889
San Mateo (	2040	SBUS	Aggregate	Aggregate	Gasoline	92.13201	3827.605	3827.605	0	368.5281
San Mateo (	2040	SBUS	Aggregate	Aggregate	Diesel	127.8409	2634.034	2634.034	0	1851.137
San Mateo (	2040	SBUS	Aggregate	Aggregate	Electricity	90.3346	3059.987	0	3059.987	826.0255
San Mateo (	2040	SBUS	Aggregate	Aggregate	Natural Gas	8.047068	163.7269	163.7269	0	116.5215
San Mateo (	2040	UBUS	Aggregate	Aggregate	Gasoline	61.32484	4000.607	4000.607	0	245.2994
San Mateo (	2040	UBUS	Aggregate	Aggregate	Diesel	24.83171	2095.295	2095.295	0	99.32684
San Mateo (	2040	UBUS	Aggregate	Aggregate	Electricity	359.517	28183.94	0	28183.94	1438.068
San Mateo (	2040	UBUS	Aggregate	Aggregate	Natural Gas	10.03348	846.6231	846.6231	0	40.13391

Energy Cons	Fuel Consumption
0	0.030111
0	17.51517
62755.04	0
0	2.390508
0	159.3564
0	0.067567
338138.6	0
49891.91	3.965106
0	22.47518
0	0.000268
8624.796	0
2780.933	0.219291
0	200.7482
0	0.57268
69218.63	0
28822.05	2.312387
0	27.53654
0	11.04028
192386.1	0
0	3.430671
0	5.924557
45438.52	0
0	2.184345
0	141.1844
0	1.235967
63314.22	0
18313.75	1.494255
0	2.265262
0	0.570698
0	6.051489
0	14.67612
126667.1	0
0	0.337513
0	1.072625
0	8.673786
5439.976	0
0	0.149421
0	0.346445
0	0.301213
3223.56	0
0	0.028247
0	0.396333
0	0.242143
49131.49	0
0	0.138727

Hillsborough HE EIR (Existing Conditions; 2020) Detailed Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Hillsborough HE EIR (Existing Conditions; 2020)
Operational Year	2020
Lead Agency	—
Land Use Scale	Plan/community
Analysis Level for Defaults	County
Windspeed (m/s)	4.60
Precipitation (days)	16.8
Location	37.55613691417112, -122.34418652475125
County	San Mateo
City	Hillsborough
Air District	Bay Area AQMD
Air Basin	San Francisco Bay Area
TAZ	1235
EDFZ	1
Electric Utility	Peninsula Clean Energy
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.18

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Single Family Housing	3,750	Dwelling Unit	1,218	7,312,500	43,923,214	—	11,410	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	190	357	208	1,413	2.91	8.89	199	208	8.73	50.5	59.2	1,777	360,770	362,547	203	11.0	1,352	372,264
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	165	332	228	1,215	2.79	8.75	199	208	8.63	50.5	59.1	1,777	349,151	350,928	205	12.2	86.1	359,765
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	172	339	209	1,254	2.72	7.84	197	205	7.70	49.9	57.6	1,777	334,567	336,344	204	11.7	614	345,548
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	31.3	61.9	38.1	229	0.50	1.43	36.0	37.4	1.40	9.11	10.5	294	55,391	55,686	33.8	1.94	102	57,209

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Mobile	157	145	122	1,167	2.36	1.95	199	201	1.82	50.5	52.3	—	239,926	239,926	12.3	9.63	1,300	244,403
Area	24.5	207	14.7	216	0.09	1.15	—	1.15	1.12	—	1.12	0.00	16,361	16,361	0.32	0.03	—	16,379
Energy	8.39	4.20	71.7	30.5	0.46	5.80	—	5.80	5.80	—	5.80	—	103,640	103,640	12.2	0.68	—	104,147
Water	—	—	—	—	—	—	—	—	—	—	—	261	843	1,103	27.0	0.67	—	1,978
Waste	—	—	—	—	—	—	—	—	—	—	—	1,516	0.00	1,516	152	0.00	—	5,305
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	52.4	52.4
Total	190	357	208	1,413	2.91	8.89	199	208	8.73	50.5	59.2	1,777	360,770	362,547	203	11.0	1,352	372,264
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	155	142	144	1,179	2.25	1.95	199	201	1.82	50.5	52.3	—	228,876	228,876	14.1	10.8	33.7	232,475
Area	1.46	185	12.4	5.29	0.08	1.01	—	1.01	1.01	—	1.01	0.00	15,792	15,792	0.30	0.03	—	15,808
Energy	8.39	4.20	71.7	30.5	0.46	5.80	—	5.80	5.80	—	5.80	—	103,640	103,640	12.2	0.68	—	104,147
Water	—	—	—	—	—	—	—	—	—	—	—	261	843	1,103	27.0	0.67	—	1,978
Waste	—	—	—	—	—	—	—	—	—	—	—	1,516	0.00	1,516	152	0.00	—	5,305
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	52.4	52.4
Total	165	332	228	1,215	2.79	8.75	199	208	8.63	50.5	59.1	1,777	349,151	350,928	205	12.2	86.1	359,765
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	152	139	136	1,120	2.26	1.95	197	199	1.82	49.9	51.8	—	229,415	229,415	13.4	10.4	561	233,394
Area	11.4	196	1.43	104	0.01	0.10	—	0.10	0.08	—	0.08	0.00	670	670	0.02	< 0.005	—	671
Energy	8.39	4.20	71.7	30.5	0.46	5.80	—	5.80	5.80	—	5.80	—	103,640	103,640	12.2	0.68	—	104,147
Water	—	—	—	—	—	—	—	—	—	—	—	261	843	1,103	27.0	0.67	—	1,978
Waste	—	—	—	—	—	—	—	—	—	—	—	1,516	0.00	1,516	152	0.00	—	5,305
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	52.4	52.4
Total	172	339	209	1,254	2.72	7.84	197	205	7.70	49.9	57.6	1,777	334,567	336,344	204	11.7	614	345,548
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	27.7	25.4	24.7	204	0.41	0.36	36.0	36.3	0.33	9.11	9.45	—	37,982	37,982	2.21	1.71	92.9	38,641
Area	2.08	35.7	0.26	19.0	< 0.005	0.02	—	0.02	0.01	—	0.01	0.00	111	111	< 0.005	< 0.005	—	111

Energy	1.53	0.77	13.1	5.57	0.08	1.06	—	1.06	1.06	—	1.06	—	17,159	17,159	2.02	0.11	—	17,243
Water	—	—	—	—	—	—	—	—	—	—	—	43.1	140	183	4.47	0.11	—	327
Waste	—	—	—	—	—	—	—	—	—	—	—	251	0.00	251	25.1	0.00	—	878
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	8.67	8.67
Total	31.3	61.9	38.1	229	0.50	1.43	36.0	37.4	1.40	9.11	10.5	294	55,391	55,686	33.8	1.94	102	57,209

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	157	145	122	1,167	2.36	1.95	199	201	1.82	50.5	52.3	—	239,926	239,926	12.3	9.63	1,300	244,403
Total	157	145	122	1,167	2.36	1.95	199	201	1.82	50.5	52.3	—	239,926	239,926	12.3	9.63	1,300	244,403
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	155	142	144	1,179	2.25	1.95	199	201	1.82	50.5	52.3	—	228,876	228,876	14.1	10.8	33.7	232,475
Total	155	142	144	1,179	2.25	1.95	199	201	1.82	50.5	52.3	—	228,876	228,876	14.1	10.8	33.7	232,475
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	27.7	25.4	24.7	204	0.41	0.36	36.0	36.3	0.33	9.11	9.45	—	37,982	37,982	2.21	1.71	92.9	38,641

Total	27.7	25.4	24.7	204	0.41	0.36	36.0	36.3	0.33	9.11	9.45	—	37,982	37,982	2.21	1.71	92.9	38,641

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	12,632	12,632	4.17	0.51	—	12,887
Total	—	—	—	—	—	—	—	—	—	—	—	—	12,632	12,632	4.17	0.51	—	12,887
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	12,632	12,632	4.17	0.51	—	12,887
Total	—	—	—	—	—	—	—	—	—	—	—	—	12,632	12,632	4.17	0.51	—	12,887
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	2,091	2,091	0.69	0.08	—	2,134
Total	—	—	—	—	—	—	—	—	—	—	—	—	2,091	2,091	0.69	0.08	—	2,134

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	8.39	4.20	71.7	30.5	0.46	5.80	—	5.80	5.80	—	5.80	—	91,008	91,008	8.05	0.17	—	91,261
Total	8.39	4.20	71.7	30.5	0.46	5.80	—	5.80	5.80	—	5.80	—	91,008	91,008	8.05	0.17	—	91,261
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	8.39	4.20	71.7	30.5	0.46	5.80	—	5.80	5.80	—	5.80	—	91,008	91,008	8.05	0.17	—	91,261
Total	8.39	4.20	71.7	30.5	0.46	5.80	—	5.80	5.80	—	5.80	—	91,008	91,008	8.05	0.17	—	91,261
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	1.53	0.77	13.1	5.57	0.08	1.06	—	1.06	1.06	—	1.06	—	15,067	15,067	1.33	0.03	—	15,109
Total	1.53	0.77	13.1	5.57	0.08	1.06	—	1.06	1.06	—	1.06	—	15,067	15,067	1.33	0.03	—	15,109

4.3. Area Emissions by Source

4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	1.46	0.73	12.4	5.29	0.08	1.01	—	1.01	1.01	—	1.01	0.00	15,792	15,792	0.30	0.03	—	15,808
Consumer Products	—	156	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Architectural	—	28.2	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	23.1	21.9	2.27	211	0.01	0.14	—	0.14	0.11	—	0.11	—	569	569	0.02	< 0.005	—	571
Total	24.5	207	14.7	216	0.09	1.15	—	1.15	1.12	—	1.12	0.00	16,361	16,361	0.32	0.03	—	16,379
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	1.46	0.73	12.4	5.29	0.08	1.01	—	1.01	1.01	—	1.01	0.00	15,792	15,792	0.30	0.03	—	15,808
Consumer Products	—	156	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	28.2	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	1.46	185	12.4	5.29	0.08	1.01	—	1.01	1.01	—	1.01	0.00	15,792	15,792	0.30	0.03	—	15,808
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.01	< 0.005	0.06	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	0.00	64.5	64.5	< 0.005	< 0.005	—	64.5
Consumer Products	—	28.6	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	5.15	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	2.08	1.98	0.20	19.0	< 0.005	0.01	—	0.01	0.01	—	0.01	—	46.4	46.4	< 0.005	< 0.005	—	46.6
Total	2.08	35.7	0.26	19.0	< 0.005	0.02	—	0.02	0.01	—	0.01	0.00	111	111	< 0.005	< 0.005	—	111

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	261	843	1,103	27.0	0.67	—	1,978
Total	—	—	—	—	—	—	—	—	—	—	—	261	843	1,103	27.0	0.67	—	1,978
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	261	843	1,103	27.0	0.67	—	1,978
Total	—	—	—	—	—	—	—	—	—	—	—	261	843	1,103	27.0	0.67	—	1,978
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	43.1	140	183	4.47	0.11	—	327
Total	—	—	—	—	—	—	—	—	—	—	—	43.1	140	183	4.47	0.11	—	327

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	1,516	0.00	1,516	152	0.00	—	5,305
Total	—	—	—	—	—	—	—	—	—	—	—	1,516	0.00	1,516	152	0.00	—	5,305
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	1,516	0.00	1,516	152	0.00	—	5,305
Total	—	—	—	—	—	—	—	—	—	—	—	1,516	0.00	1,516	152	0.00	—	5,305
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	251	0.00	251	25.1	0.00	—	878
Total	—	—	—	—	—	—	—	—	—	—	—	251	0.00	251	25.1	0.00	—	878

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	52.4	52.4
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	52.4	52.4

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	52.4	52.4
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	52.4	52.4
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	8.67	8.67
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	8.67	8.67

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Single Family Housing	38,291	38,291	38,291	13,976,306	283,355	283,355	283,355	103,424,666

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

Hearth Type	Unmitigated (number)
Single Family Housing	—
Wood Fireplaces	0
Gas Fireplaces	750
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	3000
Conventional Wood Stoves	0
Catalytic Wood Stoves	0
Non-Catalytic Wood Stoves	0
Pellet Wood Stoves	0

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
14807812.5	4,935,938	0.00	0.00	—

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)

Single Family Housing	46,114,014	100.0	0.0330	0.0040	283,970,348

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Single Family Housing	135,999,000	445,049,677

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Single Family Housing	2,813	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Single Family Housing	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Single Family Housing	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor

5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)

5.17. User Defined

Equipment Type	Fuel Type
—	—

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	8.62	annual days of extreme heat
Extreme Precipitation	7.20	annual days with precipitation above 20 mm
Sea Level Rise	0.00	meters of inundation depth
Wildfire	35.7	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider different increments of sea level rise coupled with extreme storm events. Users may select from four model simulations to view the range in potential inundation depth for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 50 meters (m) by 50 m, or about 164 feet (ft) by 164 ft.
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	2	0	0	N/A
Sea Level Rise	1	0	0	N/A

Wildfire	1	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	2	1	1	3
Sea Level Rise	1	1	1	2
Wildfire	1	1	1	2
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	10.6
AQ-PM	17.8
AQ-DPM	22.4
Drinking Water	48.5
Lead Risk Housing	38.4
Pesticides	0.00
Toxic Releases	35.1
Traffic	42.9
Effect Indicators	—
CleanUp Sites	0.00
Groundwater	61.5
Haz Waste Facilities/Generators	63.1
Impaired Water Bodies	23.9
Solid Waste	0.00
Sensitive Population	—
Asthma	7.39
Cardio-vascular	3.53
Low Birth Weights	5.12
Socioeconomic Factor Indicators	—
Education	10.8
Housing	3.42
Linguistic	38.6
Poverty	0.55

Unemployment	26.9

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	99.87167971
Employed	59.16848454
Median HI	99.97433594
Education	—
Bachelor's or higher	99.37123059
High school enrollment	100
Preschool enrollment	85.42281535
Transportation	—
Auto Access	73.42486847
Active commuting	49.59579109
Social	—
2-parent households	84.22943667
Voting	90.78660336
Neighborhood	—
Alcohol availability	87.75824458
Park access	18.45245733
Retail density	19.87681252
Supermarket access	19.09405877
Tree canopy	98.62697292
Housing	—
Homeownership	96.29154369

Housing habitability	99.30707045
Low-inc homeowner severe housing cost burden	80.35416399
Low-inc renter severe housing cost burden	99.08892596
Uncrowded housing	85.268831
Health Outcomes	—
Insured adults	99.49955088
Arthritis	0.0
Asthma ER Admissions	86.0
High Blood Pressure	0.0
Cancer (excluding skin)	0.0
Asthma	0.0
Coronary Heart Disease	0.0
Chronic Obstructive Pulmonary Disease	0.0
Diagnosed Diabetes	0.0
Life Expectancy at Birth	88.9
Cognitively Disabled	97.6
Physically Disabled	81.6
Heart Attack ER Admissions	96.5
Mental Health Not Good	0.0
Chronic Kidney Disease	0.0
Obesity	0.0
Pedestrian Injuries	48.7
Physical Health Not Good	0.0
Stroke	0.0
Health Risk Behaviors	—
Binge Drinking	0.0
Current Smoker	0.0

No Leisure Time for Physical Activity	0.0
Climate Change Exposures	—
Wildfire Risk	60.8
SLR Inundation Area	0.0
Children	73.7
Elderly	19.6
English Speaking	71.8
Foreign-born	40.3
Outdoor Workers	92.1
Climate Change Adaptive Capacity	—
Impervious Surface Cover	92.0
Traffic Density	43.8
Traffic Access	48.8
Other Indices	—
Hardship	0.4
Other Decision Support	—
2016 Voting	84.8

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	1.00
Healthy Places Index Score for Project Location (b)	100
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Characteristics: Utility Information	PCE is the electricity provider for San Mateo County.
Land Use	Population from KAI traffic model run.
Operations: Vehicle Data	Trip generation and distances updated based on KAI modeling.
Operations: Energy Use	Annual consumption data for existing LU adjusted based on historical data available through RICAPS.

Hillsborough HE EIR (Existing Conditions; 2040) Detailed Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Hillsborough HE EIR (Existing Conditions; 2040)
Operational Year	2040
Lead Agency	—
Land Use Scale	Plan/community
Analysis Level for Defaults	County
Windspeed (m/s)	4.60
Precipitation (days)	16.8
Location	37.55613691417112, -122.34418652475125
County	San Mateo
City	Hillsborough
Air District	Bay Area AQMD
Air Basin	San Francisco Bay Area
TAZ	1235
EDFZ	1
Electric Utility	Peninsula Clean Energy
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.18

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Single Family Housing	3,750	Dwelling Unit	1,218	7,312,500	43,923,214	—	10,800	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	115	288	126	895	2.42	7.54	204	212	7.47	51.8	59.3	1,696	297,537	299,233	185	6.70	130	305,973
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	95.3	269	132	666	2.33	7.45	204	212	7.40	51.8	59.2	1,696	288,696	290,392	185	7.34	54.4	297,260
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	102	276	118	746	2.26	6.51	202	209	6.46	51.2	57.7	1,696	274,012	275,708	185	7.07	85.8	282,516
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	18.7	50.4	21.5	136	0.41	1.19	36.9	38.1	1.18	9.35	10.5	281	45,366	45,647	30.6	1.17	14.2	46,774

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Mobile	86.0	80.1	40.0	646	1.87	0.64	204	205	0.60	51.8	52.4	—	190,168	190,168	5.99	5.86	77.5	192,142
Area	21.0	204	14.4	219	0.09	1.10	—	1.10	1.08	—	1.08	0.00	16,361	16,361	0.32	0.03	—	16,379
Energy	8.39	4.20	71.7	30.5	0.46	5.80	—	5.80	5.80	—	5.80	—	91,008	91,008	8.05	0.17	—	91,261
Water	—	—	—	—	—	—	—	—	—	—	—	261	0.00	261	26.7	0.63	—	1,118
Waste	—	—	—	—	—	—	—	—	—	—	—	1,435	0.00	1,435	143	0.00	—	5,021
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	52.4	52.4
Total	115	288	126	895	2.42	7.54	204	212	7.47	51.8	59.3	1,696	297,537	299,233	185	6.70	130	305,973
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	85.5	79.4	47.7	630	1.79	0.64	204	205	0.60	51.8	52.4	—	181,896	181,896	6.59	6.50	2.01	184,000
Area	1.46	185	12.4	5.29	0.08	1.01	—	1.01	1.01	—	1.01	0.00	15,792	15,792	0.30	0.03	—	15,808
Energy	8.39	4.20	71.7	30.5	0.46	5.80	—	5.80	5.80	—	5.80	—	91,008	91,008	8.05	0.17	—	91,261
Water	—	—	—	—	—	—	—	—	—	—	—	261	0.00	261	26.7	0.63	—	1,118
Waste	—	—	—	—	—	—	—	—	—	—	—	1,435	0.00	1,435	143	0.00	—	5,021
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	52.4	52.4
Total	95.3	269	132	666	2.33	7.45	204	212	7.40	51.8	59.2	1,696	288,696	290,392	185	7.34	54.4	297,260
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	84.2	78.3	44.8	610	1.80	0.64	202	203	0.60	51.2	51.8	—	182,334	182,334	6.34	6.26	33.5	184,393
Area	9.65	194	1.28	106	0.01	0.07	—	0.07	0.06	—	0.06	0.00	670	670	0.02	< 0.005	—	671
Energy	8.39	4.20	71.7	30.5	0.46	5.80	—	5.80	5.80	—	5.80	—	91,008	91,008	8.05	0.17	—	91,261
Water	—	—	—	—	—	—	—	—	—	—	—	261	0.00	261	26.7	0.63	—	1,118
Waste	—	—	—	—	—	—	—	—	—	—	—	1,435	0.00	1,435	143	0.00	—	5,021
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	52.4	52.4
Total	102	276	118	746	2.26	6.51	202	209	6.46	51.2	57.7	1,696	274,012	275,708	185	7.07	85.8	282,516
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	15.4	14.3	8.17	111	0.33	0.12	36.9	37.0	0.11	9.35	9.46	—	30,188	30,188	1.05	1.04	5.54	30,528
Area	1.76	35.4	0.23	19.3	< 0.005	0.01	—	0.01	0.01	—	0.01	0.00	111	111	< 0.005	< 0.005	—	111

Energy	1.53	0.77	13.1	5.57	0.08	1.06	—	1.06	1.06	—	1.06	—	15,067	15,067	1.33	0.03	—	15,109
Water	—	—	—	—	—	—	—	—	—	—	—	43.1	0.00	43.1	4.42	0.11	—	185
Waste	—	—	—	—	—	—	—	—	—	—	—	238	0.00	238	23.7	0.00	—	831
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	8.67	8.67
Total	18.7	50.4	21.5	136	0.41	1.19	36.9	38.1	1.18	9.35	10.5	281	45,366	45,647	30.6	1.17	14.2	46,774

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	86.0	80.1	40.0	646	1.87	0.64	204	205	0.60	51.8	52.4	—	190,168	190,168	5.99	5.86	77.5	192,142
Total	86.0	80.1	40.0	646	1.87	0.64	204	205	0.60	51.8	52.4	—	190,168	190,168	5.99	5.86	77.5	192,142
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	85.5	79.4	47.7	630	1.79	0.64	204	205	0.60	51.8	52.4	—	181,896	181,896	6.59	6.50	2.01	184,000
Total	85.5	79.4	47.7	630	1.79	0.64	204	205	0.60	51.8	52.4	—	181,896	181,896	6.59	6.50	2.01	184,000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	15.4	14.3	8.17	111	0.33	0.12	36.9	37.0	0.11	9.35	9.46	—	30,188	30,188	1.05	1.04	5.54	30,528

Total	15.4	14.3	8.17	111	0.33	0.12	36.9	37.0	0.11	9.35	9.46	—	30,188	30,188	1.05	1.04	5.54	30,528

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	8.39	4.20	71.7	30.5	0.46	5.80	—	5.80	5.80	—	5.80	—	91,008	91,008	8.05	0.17	—	91,261
Total	8.39	4.20	71.7	30.5	0.46	5.80	—	5.80	5.80	—	5.80	—	91,008	91,008	8.05	0.17	—	91,261
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	8.39	4.20	71.7	30.5	0.46	5.80	—	5.80	5.80	—	5.80	—	91,008	91,008	8.05	0.17	—	91,261
Total	8.39	4.20	71.7	30.5	0.46	5.80	—	5.80	5.80	—	5.80	—	91,008	91,008	8.05	0.17	—	91,261
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	1.53	0.77	13.1	5.57	0.08	1.06	—	1.06	1.06	—	1.06	—	15,067	15,067	1.33	0.03	—	15,109
Total	1.53	0.77	13.1	5.57	0.08	1.06	—	1.06	1.06	—	1.06	—	15,067	15,067	1.33	0.03	—	15,109

4.3. Area Emissions by Source

4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	1.46	0.73	12.4	5.29	0.08	1.01	—	1.01	1.01	—	1.01	0.00	15,792	15,792	0.30	0.03	—	15,808
Consumer Products	—	156	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Architectural	—	28.2	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	19.5	18.5	1.96	214	0.01	0.10	—	0.10	0.07	—	0.07	—	569	569	0.02	< 0.005	—	571
Total	21.0	204	14.4	219	0.09	1.10	—	1.10	1.08	—	1.08	0.00	16,361	16,361	0.32	0.03	—	16,379
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	1.46	0.73	12.4	5.29	0.08	1.01	—	1.01	1.01	—	1.01	0.00	15,792	15,792	0.30	0.03	—	15,808
Consumer Products	—	156	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	28.2	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	1.46	185	12.4	5.29	0.08	1.01	—	1.01	1.01	—	1.01	0.00	15,792	15,792	0.30	0.03	—	15,808
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.01	< 0.005	0.06	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	0.00	64.5	64.5	< 0.005	< 0.005	—	64.5
Consumer Products	—	28.6	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	5.15	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	1.75	1.66	0.18	19.2	< 0.005	0.01	—	0.01	0.01	—	0.01	—	46.4	46.4	< 0.005	< 0.005	—	46.6
Total	1.76	35.4	0.23	19.3	< 0.005	0.01	—	0.01	0.01	—	0.01	0.00	111	111	< 0.005	< 0.005	—	111

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	261	0.00	261	26.7	0.63	—	1,118
Total	—	—	—	—	—	—	—	—	—	—	—	261	0.00	261	26.7	0.63	—	1,118
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	261	0.00	261	26.7	0.63	—	1,118
Total	—	—	—	—	—	—	—	—	—	—	—	261	0.00	261	26.7	0.63	—	1,118
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	43.1	0.00	43.1	4.42	0.11	—	185
Total	—	—	—	—	—	—	—	—	—	—	—	43.1	0.00	43.1	4.42	0.11	—	185

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	1,435	0.00	1,435	143	0.00	—	5,021
Total	—	—	—	—	—	—	—	—	—	—	—	1,435	0.00	1,435	143	0.00	—	5,021
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	1,435	0.00	1,435	143	0.00	—	5,021
Total	—	—	—	—	—	—	—	—	—	—	—	1,435	0.00	1,435	143	0.00	—	5,021
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	238	0.00	238	23.7	0.00	—	831
Total	—	—	—	—	—	—	—	—	—	—	—	238	0.00	238	23.7	0.00	—	831

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	52.4	52.4
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	52.4	52.4

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	52.4	52.4
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	52.4	52.4
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	8.67	8.67
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	8.67	8.67

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Single Family Housing	39,868	39,868	39,868	14,551,820	290,426	290,426	290,426	106,005,490

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

Hearth Type	Unmitigated (number)
Single Family Housing	—
Wood Fireplaces	0
Gas Fireplaces	750
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	3000
Conventional Wood Stoves	0
Catalytic Wood Stoves	0
Non-Catalytic Wood Stoves	0
Pellet Wood Stoves	0

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
14807812.5	4,935,938	0.00	0.00	—

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)

Single Family Housing	46,114,014	0.00	0.0000	0.0000	283,970,348

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Single Family Housing	135,999,000	445,049,677

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Single Family Housing	2,663	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Single Family Housing	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Single Family Housing	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor

5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)

5.17. User Defined

Equipment Type	Fuel Type
—	—

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	8.62	annual days of extreme heat
Extreme Precipitation	7.20	annual days with precipitation above 20 mm
Sea Level Rise	0.00	meters of inundation depth
Wildfire	35.7	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider different increments of sea level rise coupled with extreme storm events. Users may select from four model simulations to view the range in potential inundation depth for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 50 meters (m) by 50 m, or about 164 feet (ft) by 164 ft.
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	2	0	0	N/A
Sea Level Rise	1	0	0	N/A

Wildfire	1	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	2	1	1	3
Sea Level Rise	1	1	1	2
Wildfire	1	1	1	2
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	10.6
AQ-PM	17.8
AQ-DPM	22.4
Drinking Water	48.5
Lead Risk Housing	38.4
Pesticides	0.00
Toxic Releases	35.1
Traffic	42.9
Effect Indicators	—
CleanUp Sites	0.00
Groundwater	61.5
Haz Waste Facilities/Generators	63.1
Impaired Water Bodies	23.9
Solid Waste	0.00
Sensitive Population	—
Asthma	7.39
Cardio-vascular	3.53
Low Birth Weights	5.12
Socioeconomic Factor Indicators	—
Education	10.8
Housing	3.42
Linguistic	38.6
Poverty	0.55

Unemployment	26.9

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	99.87167971
Employed	59.16848454
Median HI	99.97433594
Education	—
Bachelor's or higher	99.37123059
High school enrollment	100
Preschool enrollment	85.42281535
Transportation	—
Auto Access	73.42486847
Active commuting	49.59579109
Social	—
2-parent households	84.22943667
Voting	90.78660336
Neighborhood	—
Alcohol availability	87.75824458
Park access	18.45245733
Retail density	19.87681252
Supermarket access	19.09405877
Tree canopy	98.62697292
Housing	—
Homeownership	96.29154369

Housing habitability	99.30707045
Low-inc homeowner severe housing cost burden	80.35416399
Low-inc renter severe housing cost burden	99.08892596
Uncrowded housing	85.268831
Health Outcomes	—
Insured adults	99.49955088
Arthritis	0.0
Asthma ER Admissions	86.0
High Blood Pressure	0.0
Cancer (excluding skin)	0.0
Asthma	0.0
Coronary Heart Disease	0.0
Chronic Obstructive Pulmonary Disease	0.0
Diagnosed Diabetes	0.0
Life Expectancy at Birth	88.9
Cognitively Disabled	97.6
Physically Disabled	81.6
Heart Attack ER Admissions	96.5
Mental Health Not Good	0.0
Chronic Kidney Disease	0.0
Obesity	0.0
Pedestrian Injuries	48.7
Physical Health Not Good	0.0
Stroke	0.0
Health Risk Behaviors	—
Binge Drinking	0.0
Current Smoker	0.0

No Leisure Time for Physical Activity	0.0
Climate Change Exposures	—
Wildfire Risk	60.8
SLR Inundation Area	0.0
Children	73.7
Elderly	19.6
English Speaking	71.8
Foreign-born	40.3
Outdoor Workers	92.1
Climate Change Adaptive Capacity	—
Impervious Surface Cover	92.0
Traffic Density	43.8
Traffic Access	48.8
Other Indices	—
Hardship	0.4
Other Decision Support	—
2016 Voting	84.8

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	1.00
Healthy Places Index Score for Project Location (b)	100
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Characteristics: Utility Information	PCE is the electricity utility provider in San Mateo County.
Operations: Vehicle Data	Trip gen and distance updated per KAI modeling for the 2040 - No Project scenario.
Operations: Energy Use	Consumption estimates for existing land uses updated based on RICAPS data.

Hillsborough HE EIR (Proposed Conditions; 2040) Detailed Report

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8. User Changes to Default Data

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Hillsborough HE EIR (Proposed Conditions; 2040)
Operational Year	2040
Lead Agency	—
Land Use Scale	Plan/community
Analysis Level for Defaults	County
Windspeed (m/s)	4.60
Precipitation (days)	16.8
Location	37.55613691417112, -122.34418652475125
County	San Mateo
City	Hillsborough
Air District	Bay Area AQMD
Air Basin	San Francisco Bay Area
TAZ	1235
EDFZ	1
Electric Utility	Peninsula Clean Energy
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.18

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Single Family Housing	3,750	Dwelling Unit	1,218	7,312,500	43,923,214	—	10,800	—

Apartments Low Rise	127	Dwelling Unit	7.94	134,620	286,350	—	366	—
Single Family Housing	478	Dwelling Unit	25.3	932,100	5,598,746	—	1,377	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	129	328	135	1,008	2.67	7.92	229	237	7.84	58.0	65.8	1,971	324,778	326,749	213	7.51	147	334,460
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	106	306	141	743	2.56	7.81	229	237	7.76	58.0	65.7	1,971	314,857	316,828	214	8.22	62.3	324,683
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	114	314	124	836	2.48	6.65	226	233	6.59	57.4	64.0	1,971	296,756	298,727	213	7.92	97.5	306,512
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	20.8	57.3	22.6	153	0.45	1.21	41.3	42.5	1.20	10.5	11.7	326	49,131	49,458	35.3	1.31	16.1	50,747

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	96.2	89.6	44.7	723	2.10	0.72	229	230	0.67	58.0	58.7	—	212,865	212,865	6.71	6.56	86.8	215,074
Area	24.4	234	17.6	255	0.11	1.35	—	1.35	1.32	—	1.32	0.00	20,057	20,057	0.39	0.04	—	20,079
Energy	8.47	4.23	72.4	30.8	0.46	5.85	—	5.85	5.85	—	5.85	—	91,856	91,856	8.13	0.17	—	92,111
Water	—	—	—	—	—	—	—	—	—	—	—	303	0.00	303	31.0	0.74	—	1,298
Waste	—	—	—	—	—	—	—	—	—	—	—	1,669	0.00	1,669	167	0.00	—	5,838
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	60.0	60.0
Total	129	328	135	1,008	2.67	7.92	229	237	7.84	58.0	65.8	1,971	324,778	326,749	213	7.51	147	334,460
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	95.6	88.8	53.4	705	2.00	0.72	229	230	0.67	58.0	58.7	—	203,604	203,604	7.37	7.28	2.25	205,959
Area	1.79	213	15.3	6.50	0.10	1.24	—	1.24	1.24	—	1.24	0.00	19,396	19,396	0.37	0.04	—	19,416
Energy	8.47	4.23	72.4	30.8	0.46	5.85	—	5.85	5.85	—	5.85	—	91,856	91,856	8.13	0.17	—	92,111
Water	—	—	—	—	—	—	—	—	—	—	—	303	0.00	303	31.0	0.74	—	1,298
Waste	—	—	—	—	—	—	—	—	—	—	—	1,669	0.00	1,669	167	0.00	—	5,838
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	60.0	60.0
Total	106	306	141	743	2.56	7.81	229	237	7.76	58.0	65.7	1,971	314,857	316,828	214	8.22	62.3	324,683
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	94.2	87.6	50.1	683	2.01	0.72	226	227	0.67	57.4	58.0	—	204,095	204,095	7.10	7.01	37.5	206,399
Area	11.2	222	1.50	123	0.01	0.08	—	0.08	0.07	—	0.07	0.00	804	804	0.02	< 0.005	—	806
Energy	8.47	4.23	72.4	30.8	0.46	5.85	—	5.85	5.85	—	5.85	—	91,856	91,856	8.13	0.17	—	92,111
Water	—	—	—	—	—	—	—	—	—	—	—	303	0.00	303	31.0	0.74	—	1,298
Waste	—	—	—	—	—	—	—	—	—	—	—	1,669	0.00	1,669	167	0.00	—	5,838
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	60.0	60.0

Total	114	314	124	836	2.48	6.65	226	233	6.59	57.4	64.0	1,971	296,756	298,727	213	7.92	97.5	306,512
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	17.2	16.0	9.15	125	0.37	0.13	41.3	41.4	0.12	10.5	10.6	—	33,790	33,790	1.17	1.16	6.20	34,172
Area	2.05	40.6	0.27	22.4	< 0.005	0.02	—	0.02	0.01	—	0.01	0.00	133	133	< 0.005	< 0.005	—	133
Energy	1.55	0.77	13.2	5.62	0.08	1.07	—	1.07	1.07	—	1.07	—	15,208	15,208	1.35	0.03	—	15,250
Water	—	—	—	—	—	—	—	—	—	—	—	50.1	0.00	50.1	5.14	0.12	—	215
Waste	—	—	—	—	—	—	—	—	—	—	—	276	0.00	276	27.6	0.00	—	967
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	9.94	9.94
Total	20.8	57.3	22.6	153	0.45	1.21	41.3	42.5	1.20	10.5	11.7	326	49,131	49,458	35.3	1.31	16.1	50,747

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	96.2	89.6	44.7	723	2.10	0.72	229	230	0.67	58.0	58.7	—	212,865	212,865	6.71	6.56	86.8	215,074
Apartments Low Rise	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	96.2	89.6	44.7	723	2.10	0.72	229	230	0.67	58.0	58.7	—	212,865	212,865	6.71	6.56	86.8	215,074
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Single Family Housing	95.6	88.8	53.4	705	2.00	0.72	229	230	0.67	58.0	58.7	—	203,604	203,604	7.37	7.28	2.25	205,959
Apartments Low Rise	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	95.6	88.8	53.4	705	2.00	0.72	229	230	0.67	58.0	58.7	—	203,604	203,604	7.37	7.28	2.25	205,959
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	17.2	16.0	9.15	125	0.37	0.13	41.3	41.4	0.12	10.5	10.6	—	33,790	33,790	1.17	1.16	6.20	34,172
Apartments Low Rise	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	17.2	16.0	9.15	125	0.37	0.13	41.3	41.4	0.12	10.5	10.6	—	33,790	33,790	1.17	1.16	6.20	34,172

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	8.46	4.23	72.3	30.8	0.46	5.85	—	5.85	5.85	—	5.85	—	91,769	91,769	8.12	0.17	—	92,024
Apartments Low Rise	0.01	< 0.005	0.07	0.03	< 0.005	0.01	—	0.01	0.01	—	0.01	—	87.3	87.3	0.01	< 0.005	—	87.5
Total	8.47	4.23	72.4	30.8	0.46	5.85	—	5.85	5.85	—	5.85	—	91,856	91,856	8.13	0.17	—	92,111

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	8.46	4.23	72.3	30.8	0.46	5.85	—	5.85	5.85	—	5.85	—	91,769	91,769	8.12	0.17	—	92,024
Apartments Low Rise	0.01	< 0.005	0.07	0.03	< 0.005	0.01	—	0.01	0.01	—	0.01	—	87.3	87.3	0.01	< 0.005	—	87.5
Total	8.47	4.23	72.4	30.8	0.46	5.85	—	5.85	5.85	—	5.85	—	91,856	91,856	8.13	0.17	—	92,111
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	1.54	0.77	13.2	5.61	0.08	1.07	—	1.07	1.07	—	1.07	—	15,193	15,193	1.34	0.03	—	15,236
Apartments Low Rise	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	14.5	14.5	< 0.005	< 0.005	—	14.5
Total	1.55	0.77	13.2	5.62	0.08	1.07	—	1.07	1.07	—	1.07	—	15,208	15,208	1.35	0.03	—	15,250

4.3. Area Emissions by Source

4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	1.79	0.89	15.3	6.50	0.10	1.24	—	1.24	1.24	—	1.24	0.00	19,396	19,396	0.37	0.04	—	19,416
Consumer Products	—	179	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Architectural Coatings	—	32.3	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	22.6	21.4	2.28	248	0.01	0.11	—	0.11	0.08	—	0.08	—	661	661	0.03	0.01	—	663
Total	24.4	234	17.6	255	0.11	1.35	—	1.35	1.32	—	1.32	0.00	20,057	20,057	0.39	0.04	—	20,079
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	1.79	0.89	15.3	6.50	0.10	1.24	—	1.24	1.24	—	1.24	0.00	19,396	19,396	0.37	0.04	—	19,416
Consumer Products	—	179	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	32.3	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	1.79	213	15.3	6.50	0.10	1.24	—	1.24	1.24	—	1.24	0.00	19,396	19,396	0.37	0.04	—	19,416
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.01	< 0.005	0.07	0.03	< 0.005	0.01	—	0.01	0.01	—	0.01	0.00	79.2	79.2	< 0.005	< 0.005	—	79.3
Consumer Products	—	32.7	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	5.90	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	2.04	1.93	0.21	22.3	< 0.005	0.01	—	0.01	0.01	—	0.01	—	53.9	53.9	< 0.005	< 0.005	—	54.1
Total	2.05	40.6	0.27	22.4	< 0.005	0.02	—	0.02	0.01	—	0.01	0.00	133	133	< 0.005	< 0.005	—	133

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	294	0.00	294	30.1	0.72	—	1,260
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	8.83	0.00	8.83	0.90	0.02	—	37.9
Total	—	—	—	—	—	—	—	—	—	—	—	303	0.00	303	31.0	0.74	—	1,298
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	294	0.00	294	30.1	0.72	—	1,260
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	8.83	0.00	8.83	0.90	0.02	—	37.9
Total	—	—	—	—	—	—	—	—	—	—	—	303	0.00	303	31.0	0.74	—	1,298
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	48.6	0.00	48.6	4.99	0.12	—	209
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	1.46	0.00	1.46	0.15	< 0.005	—	6.27
Total	—	—	—	—	—	—	—	—	—	—	—	50.1	0.00	50.1	5.14	0.12	—	215

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	1,618	0.00	1,618	162	0.00	—	5,661
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	50.6	0.00	50.6	5.06	0.00	—	177
Total	—	—	—	—	—	—	—	—	—	—	—	1,669	0.00	1,669	167	0.00	—	5,838
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	1,618	0.00	1,618	162	0.00	—	5,661
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	50.6	0.00	50.6	5.06	0.00	—	177
Total	—	—	—	—	—	—	—	—	—	—	—	1,669	0.00	1,669	167	0.00	—	5,838
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	268	0.00	268	26.8	0.00	—	937
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	8.39	0.00	8.39	0.84	0.00	—	29.3
Total	—	—	—	—	—	—	—	—	—	—	—	276	0.00	276	27.6	0.00	—	967

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	59.0	59.0
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.96	0.96
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	60.0	60.0
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	59.0	59.0
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.96	0.96
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	60.0	60.0
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	9.78	9.78
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.16	0.16
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	9.94	9.94

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Single Family Housing	44,587	44,587	44,587	16,274,437	325,096	325,096	325,096	118,660,179
Apartments Low Rise	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Single Family Housing	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

Hearth Type	Unmitigated (number)
Single Family Housing	—
Wood Fireplaces	0
Gas Fireplaces	750
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	3000
Wood Fireplaces	0
Gas Fireplaces	96
Propane Fireplaces	0

Electric Fireplaces	0
No Fireplaces	382
Conventional Wood Stoves	0
Catalytic Wood Stoves	0
Non-Catalytic Wood Stoves	0
Pellet Wood Stoves	0
Conventional Wood Stoves	0
Catalytic Wood Stoves	0
Non-Catalytic Wood Stoves	0
Pellet Wood Stoves	0
Apartments Low Rise	—
Wood Fireplaces	0
Gas Fireplaces	65
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	62
Conventional Wood Stoves	0
Catalytic Wood Stoves	0
Non-Catalytic Wood Stoves	0
Pellet Wood Stoves	0

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
16967920.5	5,655,974	0.00	0.00	—

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Single Family Housing	46,114,014	0.00	0.0000	0.0000	283,970,348
Apartments Low Rise	1,139,384	0.00	0.0000	0.0000	272,338
Single Family Housing	8,735,824	0.00	0.0000	0.0000	2,373,744

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Single Family Housing	135,999,000	445,049,677
Apartments Low Rise	4,605,833	2,901,426
Single Family Housing	17,335,339	56,729,002

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Single Family Housing	2,663	—
Apartments Low Rise	94.0	—

Single Family Housing	340	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Single Family Housing	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Single Family Housing	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00
Apartments Low Rise	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Apartments Low Rise	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00
Single Family Housing	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Single Family Housing	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor

5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)

5.17. User Defined

Equipment Type	Fuel Type
—	—

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	8.62	annual days of extreme heat
Extreme Precipitation	7.20	annual days with precipitation above 20 mm
Sea Level Rise	0.00	meters of inundation depth
Wildfire	35.7	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider different increments of sea level rise coupled with extreme storm events. Users may select from four model simulations to view the range in potential inundation depth for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 50 meters (m) by 50 m, or about 164 feet (ft) by 164 ft.
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	2	0	0	N/A
Sea Level Rise	1	0	0	N/A
Wildfire	1	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A

Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	2	1	1	3
Sea Level Rise	1	1	1	2
Wildfire	1	1	1	2
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract

Exposure Indicators	—
AQ-Ozone	10.6
AQ-PM	17.8
AQ-DPM	22.4
Drinking Water	48.5
Lead Risk Housing	38.4
Pesticides	0.00
Toxic Releases	35.1
Traffic	42.9
Effect Indicators	—
CleanUp Sites	0.00
Groundwater	61.5
Haz Waste Facilities/Generators	63.1
Impaired Water Bodies	23.9
Solid Waste	0.00
Sensitive Population	—
Asthma	7.39
Cardio-vascular	3.53
Low Birth Weights	5.12
Socioeconomic Factor Indicators	—
Education	10.8
Housing	3.42
Linguistic	38.6
Poverty	0.55
Unemployment	26.9

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	99.87167971
Employed	59.16848454
Median HI	99.97433594
Education	—
Bachelor's or higher	99.37123059
High school enrollment	100
Preschool enrollment	85.42281535
Transportation	—
Auto Access	73.42486847
Active commuting	49.59579109
Social	—
2-parent households	84.22943667
Voting	90.78660336
Neighborhood	—
Alcohol availability	87.75824458
Park access	18.45245733
Retail density	19.87681252
Supermarket access	19.09405877
Tree canopy	98.62697292
Housing	—
Homeownership	96.29154369
Housing habitability	99.30707045
Low-inc homeowner severe housing cost burden	80.35416399
Low-inc renter severe housing cost burden	99.08892596
Uncrowded housing	85.268831

Health Outcomes	—
Insured adults	99.49955088
Arthritis	0.0
Asthma ER Admissions	86.0
High Blood Pressure	0.0
Cancer (excluding skin)	0.0
Asthma	0.0
Coronary Heart Disease	0.0
Chronic Obstructive Pulmonary Disease	0.0
Diagnosed Diabetes	0.0
Life Expectancy at Birth	88.9
Cognitively Disabled	97.6
Physically Disabled	81.6
Heart Attack ER Admissions	96.5
Mental Health Not Good	0.0
Chronic Kidney Disease	0.0
Obesity	0.0
Pedestrian Injuries	48.7
Physical Health Not Good	0.0
Stroke	0.0
Health Risk Behaviors	—
Binge Drinking	0.0
Current Smoker	0.0
No Leisure Time for Physical Activity	0.0
Climate Change Exposures	—
Wildfire Risk	60.8
SLR Inundation Area	0.0

Children	73.7
Elderly	19.6
English Speaking	71.8
Foreign-born	40.3
Outdoor Workers	92.1
Climate Change Adaptive Capacity	—
Impervious Surface Cover	92.0
Traffic Density	43.8
Traffic Access	48.8
Other Indices	—
Hardship	0.4
Other Decision Support	—
2016 Voting	84.8

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	1.00
Healthy Places Index Score for Project Location (b)	100
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Characteristics: Utility Information	PCE is the electricity utility provider for San Mateo County.
Land Use	New FR lot acreage reduced to reflect that 400 units would be ADUs (on same property as existing SFR). MFR landscaping added to same ratio as landscaping per acreage for SFR.
Operations: Vehicle Data	Trip gen and distance updated based on KAI modeling for 2040 Project Scenario.
Operations: Energy Use	New SFR and Apt Low Rise modeled as being in compliance with Town's Reach Code. 49% and 40% of natural gas from space heating and water heating, respectively, transitioned to electricity at 3.41214 kBtu per 1 kWh.

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Appendix D: Biology CNDDB Search Results and WRA Biological Survey

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Appendix C. Special-status plant and wildlife species documented in the vicinity of the Project Area.

The species list was compiled from a search of the California Department of Fish and Wildlife Natural Diversity Database (CDFW 2023), the U.S. Fish and Wildlife Service Information Planning and Consultation database (USFWS 2023), and the California Native Plant Society Inventory of Rare and Endangered Plants (CNPS 2023a), for the San Mateo, San Francisco South, Hunters Point, San Leandro, Redwood Point, Palo Alto, Montara Mountain, Woodside, and Half Moon Bay U.S. Geological Survey (USGS) 7.5-minute quadrangles. The table below was derived from the Tobin Clark Property Biological Review (WRA 2023).

SPECIES	STATUS*	HABITAT
PLANTS		
San Mateo thorn-mint *Acanthomintha duttonii*	FE, SE, Rank 1B.1	Chaparral, valley and foothill grassland. Elevation ranges from 165 to 985 feet (50 to 300 meters). Blooms Apr–Jun.
Blasdale's bent grass *Agrostis blasdalei*	Rank 1B.2	Coastal bluff scrub, coastal dunes, coastal prairie. Elevation ranges from 0 to 490 feet (0 to 150 meters). Blooms May–Jul.
Franciscan onion *Allium peninsulare* var. *franciscanum*	Rank 1B.2	Cismontane woodland, valley and foothill grassland. Elevation ranges from 170 to 1000 feet (52 to 305 meters). Blooms (Apr) May–Jun.
bent-flowered fiddleneck *Amsinckia lunaris*	Rank 1B.2	Cismontane woodland, coastal bluff scrub, valley, and foothill grassland. Elevation ranges from 10 to 1640 feet (3 to 500 meters). Blooms Mar–Jun.
California androsace *Androsace elongata* ssp. *acuta*	Rank 4.2	Chaparral, cismontane woodland, coastal scrub, meadows and seeps, pinyon and juniper woodland, valley, and foothill grassland. Elevation ranges from 490 to 4280 feet (150 to 1305 meters). Blooms Mar–Jun.
coast rockcress *Arabis blepharophylla*	Rank 4.3	Broad-leafed upland forest, coastal bluff scrub, coastal prairie, coastal scrub. Elevation ranges from 10 to 3610 feet (3 to 1100 meters). Blooms Feb–May.
Anderson's manzanita *Arctostaphylos andersonii*	Rank 1B.2	Broad-leafed upland forest, chaparral, north coast coniferous forest. Elevation ranges from 195 to 2495 feet (60 to 760 meters). Blooms Nov–May.
Franciscan manzanita *Arctostaphylos franciscana*	FE, Rank 1B.1	Coastal scrub (serpentine). Elevation ranges from 195 to 985 feet (60 to 300 meters). Blooms Feb–Apr.
San Bruno Mountain manzanita *Arctostaphylos imbricata*	SE, Rank 1B.1	Chaparral, coastal scrub. Elevation ranges from 900 to 1215 feet (275 to 370 meters). Blooms Feb–May.
Presidio manzanita *Arctostaphylos montana* ssp. *ravenii*	FE, SE, Rank 1B.1	Chaparral, coastal prairie, coastal scrub. Elevation ranges from 150 to 705 feet (45 to 215 meters). Blooms Feb–Mar.
Montara manzanita *Arctostaphylos montaraensis*	Rank 1B.2	Chaparral (maritime), coastal scrub. Elevation ranges from 260 to 1640 feet (80 to 500 meters). Blooms Jan–Mar.
Pacific manzanita *Arctostaphylos pacifica*	SE, Rank 1B.1	Chaparral, coastal scrub. Elevation ranges from 1085 to 1085 feet (330 to 330 meters). Blooms Feb–Apr.
Kings Mountain manzanita *Arctostaphylos regismontana*	Rank 1B.2	Broad-leafed upland forest, chaparral, north coast coniferous forest. Elevation ranges from 1000 to 2395 feet (305 to 730 meters). Blooms Dec–Apr.
ocean bluff milk-vetch *Astragalus nuttallii* var. *nuttallii*	Rank 4.2	Coastal bluff scrub, coastal dunes. Elevation ranges from 10 to 395 feet (3 to 120 meters). Blooms Jan–Nov.

SPECIES	STATUS*	HABITAT
coastal marsh milk-vetch *Astragalus pycnostachyus* var. *pycnostachyus*	Rank 1B.2	Coastal dunes (mesic), coastal scrub, marshes and swamps (coastal salt, streamside). Elevation ranges from 0 to 180 feet (0 to 55 meters). Blooms (Apr) Jun–Oct.
alkali milk-vetch *Astragalus tener* var. *tener*	Rank 1B.2	Playas, valley and foothill grassland (adobe clay), vernal pools. Elevation ranges from 5 to 195 feet (1 to 60 meters). Blooms Mar–Jun.
Brewer's calandrinia *Calandrinia breweri*	Rank 4.2	Chaparral, coastal scrub. Elevation ranges from 35 to 4005 feet (10 to 1220 meters). Blooms (Jan)Mar–Jun.
Oakland star-tulip *Calochortus umbellatus*	Rank 4.2	Broad-leafed upland forest, chaparral, cismontane woodland, lower montane coniferous forest, valley, and foothill grassland. Elevation ranges from 330 to 2295 feet (100 to 700 meters). Blooms Mar–May.
pink star-tulip *Calochortus uniflorus*	Rank 4.2	Coastal prairie, coastal scrub, meadows and seeps, north coast coniferous forest. Elevation ranges from 35 to 3510 feet (10 to 1070 meters). Blooms Apr–Jun.
bristly sedge *Carex comosa*	Rank 2B.1	Coastal prairie, marshes and swamps (lake margins), valley and foothill grassland. Elevation ranges from 0 to 2050 feet (0 to 625 meters). Blooms May–Sep.
johnny-nip *Castilleja ambigua* var. *ambigua*	Rank 4.2	Coastal bluff scrub, coastal prairie, coastal scrub, marshes and swamps, valley and foothill grassland, vernal pools (margins). Elevation ranges from 0 to 1425 feet (0 to 435 meters). Blooms Mar–Aug.
Congdon's tarplant *Centromadia parryi* ssp. *congdonii*	Rank 1B.1	Valley and foothill grassland (alkaline). Elevation ranges from 0 to 755 feet (0 to 230 meters). Blooms May–Oct (Nov).
pappose tarplant *Centromadia parryi* ssp. *parryi*	Rank 1B.2	Chaparral, coastal prairie, marshes and swamps (coastal salt), meadows and seeps, valley and foothill grassland (vernally mesic). Elevation ranges from 0 to 1380 feet (0 to 420 meters). Blooms May–Nov.
Point Reyes salty bird's-beak *Chloropyron maritimum* ssp. *palustre*	Rank 1B.2	Marshes and swamps (coastal salt). Elevation ranges from 0 to 35 feet (0 to 10 meters). Blooms Jun–Oct.
San Francisco Bay spineflower *Chorizanthe cuspidata* var. *cuspidata*	Rank 1B.2	Coastal bluff scrub, coastal dunes, coastal prairie, coastal scrub. Elevation ranges from 10 to 705 feet (3 to 215 meters). Blooms Apr–Jul (Aug).
robust spineflower *Chorizanthe robusta* var. *robusta*	FE, Rank 1B.1	Chaparral (maritime), cismontane woodland (openings), coastal dunes, coastal scrub. Elevation ranges from 10 to 985 feet (3 to 300 meters). Blooms Apr–Sep.
Franciscan thistle *Cirsium andrewsii*	Rank 1B.2	Broad-leafed upland forest, coastal bluff scrub, coastal prairie, coastal scrub. Elevation ranges from 0 to 490 feet (0 to 150 meters). Blooms Mar–Jul.
fountain thistle *Cirsium fontinale* var. *fontinale*	FE, SE, Rank 1B.1	Chaparral (openings), cismontane woodland, meadows and seeps, valley and foothill grassland. Elevation ranges from 150 to 575 feet (45 to 175 meters). Blooms (Apr) May–Oct.
compact cobwebby thistle *Cirsium occidentale* var. *compactum*	Rank 1B.2	Chaparral, coastal dunes, coastal prairie, coastal scrub. Elevation ranges from 15 to 490 feet (5 to 150 meters). Blooms Apr–Jun.

SPECIES	STATUS*	HABITAT
lost thistle *Cirsium praeteriens*	Rank 1A	Known from only two records in California. Thought to be extirpated. Blooms Jun-Jul.
round-headed collinsia *Collinsia corymbosa*	Rank 1B.2	Coastal dunes. Elevation ranges from 0 to 65 feet (0 to 20 meters). Blooms Apr–Jun.
San Francisco collinsia *Collinsia multicolor*	Rank 1B.2	Closed-cone coniferous forest, coastal scrub. Elevation ranges from 100 to 900 feet (30 to 275 meters). Blooms (Feb) Mar–May.
clustered lady's-slipper *Cypripedium fasciculatum*	Rank 4.2	Lower montane coniferous forest, north coast coniferous forest. Elevation ranges from 330 to 7990 feet (100 to 2435 meters). Blooms Mar–Aug.
western leatherwood *Dirca occidentalis*	Rank 1B.2	Broad-leafed upland forest, chaparral, cismontane woodland, closed-cone coniferous forest, north coast coniferous forest, riparian forest, riparian woodland. Elevation ranges from 80 to 1395 feet (25 to 425 meters). Blooms Jan–Mar (Apr).
California bottle-brush grass *Elymus californicus*	Rank 4.3	Broad-leafed upland forest, cismontane woodland, north coast coniferous forest, riparian woodland. Elevation ranges from 50 to 1540 feet (15 to 470 meters). Blooms May–Aug (Nov).
San Mateo woolly sunflower *Eriophyllum latilobum*	FE, SE, Rank 1B.1	Cismontane woodland (often serpentine, roadcuts), coastal scrub, lower montane coniferous forest. Elevation ranges from 150 to 1085 feet (45 to 330 meters). Blooms May–Jun.
Hoover's button-celery *Eryngium aristulatum* var. *hooveri*	Rank 1B.1	Vernal pools. Elevation ranges from 10 to 150 feet (3 to 45 meters). Blooms (Jun)Jul(Aug).
Jepson's coyote-thistle *Eryngium jepsonii*	Rank 1B.2	Valley and foothill grassland, vernal pools. Elevation ranges from 10 to 985 feet (3 to 300 meters). Blooms Apr–Aug.
San Francisco wallflower *Erysimum franciscanum*	Rank 4.2	Chaparral, coastal dunes, coastal scrub, valley and foothill grassland. Elevation ranges from 0 to 1805 feet (0 to 550 meters). Blooms Mar–Jun.
Hillsborough chocolate lily *Fritillaria biflora* var. *ineziana*	Rank 1B.1	Cismontane woodland, valley and foothill grassland. Elevation ranges from 490 to 490 feet (150 to 150 meters). Blooms Mar–Apr.
Marin checker lily *Fritillaria lanceolata* var. *tristulis*	Rank 1B.1	Coastal bluff scrub, coastal prairie, coastal scrub. Elevation ranges from 50 to 490 feet (15 to 150 meters). Blooms Feb–May.
fragrant fritillary *Fritillaria liliacea*	Rank 1B.2	Cismontane woodland, coastal prairie, coastal scrub, valley and foothill grassland. Elevation ranges from 10 to 1345 feet (3 to 410 meters). Blooms Feb–Apr.
blue coast gilia *Gilia capitata* ssp. *chamissonis*	Rank 1B.1	Coastal dunes, coastal scrub. Elevation ranges from 5 to 655 feet (2 to 200 meters). Blooms Apr–Jul.
dark-eyed gilia *Gilia millefoliata*	Rank 1B.2	Coastal dunes. Elevation ranges from 5 to 100 feet (2 to 30 meters). Blooms Apr–Jul.
San Francisco gumplant *Grindelia hirsutula* var. *maritima*	Rank 3.2	Coastal bluff scrub, coastal scrub, valley and foothill grassland. Elevation ranges from 50 to 1310 feet (15 to 400 meters). Blooms Jun–Sep.

SPECIES	STATUS*	HABITAT
Diablo helianthella *Helianthella castanea*	Rank 1B.2	Broad-leafed upland forest, chaparral, cismontane woodland, coastal scrub, riparian woodland, valley and foothill grassland. Elevation ranges from 195 to 4265 feet (60 to 1300 meters). Blooms Mar–Jun.
congested-headed hayfield tarplant *Hemizonia congesta* ssp. *congesta*	Rank 1B.2	Valley and foothill grassland. Elevation ranges from 65 to 1835 feet (20 to 560 meters). Blooms Apr–Nov.
short-leaved evax *Hesperevax sparsiflora* var. *brevifolia*	Rank 1B.2	Coastal bluff scrub (sandy), coastal dunes, coastal prairie. Elevation ranges from 0 to 705 feet (0 to 215 meters). Blooms Mar–Jun.
Marin western flax *Hesperolinon congestum*	FT, ST, Rank 1B.1	Chaparral, valley and foothill grassland. Elevation ranges from 15 to 1215 feet (5 to 370 meters). Blooms Apr–Jul.
water star-grass *Heteranthera dubia*	Rank 2B.2	Marshes and swamps (alkaline, still, slow-moving water). Elevation ranges from 100 to 4905 feet (30 to 1495 meters). Blooms Jul–Oct.
Loma Prieta hoita *Hoita strobilina*	Rank 1B.1	Chaparral, cismontane woodland, riparian woodland. Elevation ranges from 100 to 2820 feet (30 to 860 meters). Blooms May–Jul (Aug–Oct).
Kellogg's horkelia *Horkelia cuneata* var. *sericea*	Rank 1B.1	Chaparral (maritime), closed-cone coniferous forest, coastal dunes, coastal scrub. Elevation ranges from 35 to 655 feet (10 to 200 meters). Blooms Apr–Sep.
Point Reyes horkelia *Horkelia marinensis*	Rank 1B.2	Coastal dunes, coastal prairie, coastal scrub. Elevation ranges from 15 to 2475 feet (5 to 755 meters). Blooms May–Sep.
harlequin lotus *Hosackia gracilis*	Rank 4.2	Broad-leafed upland forest, cismontane woodland, closed-cone coniferous forest, coastal bluff scrub, coastal prairie, coastal scrub, marshes and swamps, meadows and seeps, north coast coniferous forest, valley and foothill grassland. Elevation ranges from 0 to 2295 feet (0 to 700 meters). Blooms Mar–Jul.
island tube lichen *Hypogymnia schizidiata*	Rank 1B.3	Chaparral, closed-cone coniferous forest. Elevation ranges from 1180 to 1330 feet (360 to 405 meters).
coast iris *Iris longipetala*	Rank 4.2	Coastal prairie, lower montane coniferous forest, meadows and seeps. Elevation ranges from 0 to 1970 feet (0 to 600 meters). Blooms Mar–May (Jun).
perennial goldfields *Lasthenia californica* ssp. *macrantha*	Rank 1B.2	Coastal bluff scrub, coastal dunes, coastal scrub. Elevation ranges from 15 to 1705 feet (5 to 520 meters). Blooms Jan–Nov.
Contra Costa goldfields *Lasthenia conjugens*	FE, Rank 1B.1	Cismontane woodland, playas (alkaline), valley and foothill grassland, vernal pools. Elevation ranges from 0 to 1540 feet (0 to 470 meters). Blooms Mar–Jun.
beach layia *Layia carnosa*	FT, SE, Rank 1B.1	Coastal dunes, coastal scrub (sandy). Elevation ranges from 0 to 195 feet (0 to 60 meters). Blooms Mar–Jul.
serpentine leptosiphon *Leptosiphon ambiguus*	Rank 4.2	Cismontane woodland, coastal scrub, valley and foothill grassland. Elevation ranges from 395 to 3710 feet (120 to 1130 meters). Blooms Mar–Jun.
bristly leptosiphon *Leptosiphon aureus*	Rank 4.2	Chaparral, cismontane woodland, coastal prairie, valley and foothill grassland. Elevation ranges from 180 to 4920 feet (55 to 1500 meters). Blooms Apr–Jul.

SPECIES	STATUS*	HABITAT
coast yellow leptosiphon *Leptosiphon croceus*	SE, Rank 1B.1	Coastal bluff scrub, coastal prairie. Elevation ranges from 35 to 490 feet (10 to 150 meters). Blooms Apr–Jun.
large-flowered leptosiphon *Leptosiphon grandiflorus*	Rank 4.2	Cismontane woodland, closed-cone coniferous forest, coastal bluff scrub, coastal dunes, coastal prairie, coastal scrub, valley and foothill grassland. Elevation ranges from 15 to 4005 feet (5 to 1220 meters). Blooms Apr–Aug.
broad-lobed leptosiphon *Leptosiphon latisectus*	Rank 4.3	Broad-leafed upland forest, cismontane woodland. Elevation ranges from 560 to 4920 feet (170 to 1500 meters). Blooms Apr–Jun.
rose leptosiphon *Leptosiphon rosaceus*	Rank 1B.1	Coastal bluff scrub. Elevation ranges from 0 to 330 feet (0 to 100 meters). Blooms Apr–Jul.
Crystal Springs lessingia *Lessingia arachnoidea*	Rank 1B.2	Cismontane woodland, coastal scrub, valley and foothill grassland. Elevation ranges from 195 to 655 feet (60 to 200 meters). Blooms Jul–Oct.
San Francisco lessingia *Lessingia germanorum*	FE, SE, Rank 1B.1	Coastal scrub (remnant dunes). Elevation ranges from 80 to 360 feet (25 to 110 meters). Blooms (Jun)Jul–Nov.
woolly-headed lessingia *Lessingia hololeuca*	Rank 3	Broad-leafed upland forest, coastal scrub, lower montane coniferous forest, valley and foothill grassland. Elevation ranges from 50 to 1000 feet (15 to 305 meters). Blooms Jun–Oct.
spring lessingia *Lessingia tenuis*	Rank 4.3	Chaparral, cismontane woodland, lower montane coniferous forest. Elevation ranges from 985 to 7055 feet (300 to 2150 meters). Blooms May–Jul.
Ornduff's meadowfoam *Limnanthes douglasii* ssp. *ornduffii*	Rank 1B.1	Meadows and seeps. Elevation ranges from 35 to 65 feet (10 to 20 meters). Blooms Nov–May.
San Mateo tree lupine *Lupinus arboreus* var. *eximius*	Rank 3.2	Chaparral, coastal scrub. Elevation ranges from 295 to 1805 feet (90 to 550 meters). Blooms Apr–Jul.
arcuate bush-mallow *Malacothamnus arcuatus*	Rank 1B.2	Chaparral, cismontane woodland. Elevation ranges from 50 to 1165 feet (15 to 355 meters). Blooms Apr–Sep.
northern curly-leaved monardella *Monardella sinuata* ssp. *nigrescens*	Rank 1B.2	Chaparral (scr co.), coastal dunes, coastal scrub, lower montane coniferous forest (scr co., ponderosa pine sandhills). Elevation ranges from 0 to 985 feet (0 to 300 meters). Blooms (Apr)May–Jul (Aug–Sep).
woodland woollythreads *Monolopia gracilens*	Rank 1B.2	Broad-leafed upland forest (openings), chaparral (openings), cismontane woodland, north coast coniferous forest (openings), valley and foothill grassland. Elevation ranges from 330 to 3935 feet (100 to 1200 meters). Blooms (Feb) Mar–Jul.
white-rayed pentachaeta *Pentachaeta bellidiflora*	FE, SE, Rank 1B.1	Cismontane woodland, valley and foothill grassland (often serpentine). Elevation ranges from 115 to 2035 feet (35 to 620 meters). Blooms Mar–May.
Michael's rein orchid *Piperia michaelii*	Rank 4.2	Chaparral, cismontane woodland, closed-cone coniferous forest, coastal bluff scrub, coastal scrub, lower montane coniferous forest. Elevation ranges from 10 to 3000 feet (3 to 915 meters). Blooms Apr–Aug.

SPECIES	STATUS*	HABITAT
Choris' popcornflower *Plagiobothrys chorisianus* var. *chorisianus*	Rank 1B.2	Chaparral, coastal prairie, coastal scrub. Elevation ranges from 10 to 525 feet (3 to 160 meters). Blooms Mar–Jun.
Hickman's popcornflower *Plagiobothrys chorisianus* var. *hickmanii*	Rank 4.2	Chaparral, closed-cone coniferous forest, coastal scrub, marshes and swamps, vernal pools. Elevation ranges from 50 to 1280 feet (15 to 390 meters). Blooms Apr–Jun.
Oregon polemonium *Polemonium carneum*	Rank 2B.2	Coastal prairie, coastal scrub, lower montane coniferous forest. Elevation ranges from 0 to 6005 feet (0 to 1830 meters). Blooms Apr–Sep.
Marin knotweed *Polygonum marinense*	Rank 3.1	Marshes and swamps (brackish, coastal salt). Elevation ranges from 0 to 35 feet (0 to 10 meters). Blooms (Apr)May–Aug(Oct).
Hickman's cinquefoil *Potentilla hickmanii*	FE, SE, Rank 1B.1	Closed-cone coniferous forest, coastal bluff scrub, marshes and swamps (freshwater), meadows and seeps (vernally mesic). Elevation ranges from 35 to 490 feet (10 to 149 meters). Blooms Apr–Aug.
Lobb's aquatic buttercup *Ranunculus lobbii*	Rank 4.2	Cismontane woodland, north coast coniferous forest, valley and foothill grassland, vernal pools. Elevation ranges from 50 to 1540 feet (15 to 470 meters). Blooms Feb–May.
Sanford's arrowhead *Sagittaria sanfordii*	Rank 1B.2	Marshes and swamps (shallow freshwater). Elevation ranges from 0 to 2135 feet (0 to 650 meters). Blooms May–Oct(Nov).
adobe sanicle *Sanicula maritima*	SR, Rank 1B.1	Chaparral, coastal prairie, meadows and seeps, valley and foothill grassland. Elevation ranges from 100 to 785 feet (30 to 240 meters). Blooms Feb–May.
chaparral ragwort *Senecio aphanactis*	Rank 2B.2	Chaparral, cismontane woodland, coastal scrub. Elevation ranges from 50 to 2625 feet (15 to 800 meters). Blooms Jan–Apr (May).
Scouler's catchfly *Silene scouleri* ssp. *scouleri*	Rank 2B.2	Coastal bluff scrub, coastal prairie, valley and foothill grassland. Elevation ranges from 0 to 1970 feet (0 to 600 meters). Blooms (Mar–May) Jun–Aug (Sep).
San Francisco campion *Silene verecunda* ssp. *verecunda*	Rank 1B.2	Chaparral, coastal bluff scrub, coastal prairie, coastal scrub, valley and foothill grassland. Elevation ranges from 100 to 2115 feet (30 to 645 meters). Blooms (Feb)Mar–Jul(Aug).
long-styled sand-spurrey *Spergularia macrotheca* var. *longistyla*	Rank 1B.2	Marshes and swamps, meadows and seeps. Elevation ranges from 0 to 835 feet (0 to 255 meters). Blooms Feb–May.
most beautiful jewelflower *Streptanthus albidus* ssp. *peramoenus*	Rank 1B.2	Chaparral, cismontane woodland, valley and foothill grassland. Elevation ranges from 310 to 3280 feet (95 to 1000 meters). Blooms (Mar) Apr–Sep (Oct).
northern slender pondweed *Stuckenia filiformis ssp. alpina*	Rank 2B.2	Marshes and swamps (shallow freshwater). Elevation ranges from 985 to 7055 feet (300 to 2150 meters). Blooms May–Jul.
California seablite *Suaeda californica*	FE, Rank 1B.1	Marshes and swamps (coastal salt). Elevation ranges from 0 to 50 feet (0 to 15 meters). Blooms Jul–Oct.

SPECIES	STATUS*	HABITAT
two-fork clover *Trifolium amoenum*	FE, Rank 1B.1	Coastal bluff scrub, valley and foothill grassland (sometimes serpentine). Elevation ranges from 15 to 1360 feet (5 to 415 meters). Blooms Apr–Jun.
saline clover *Trifolium hydrophilum*	Rank 1B.2	Marshes and swamps, valley and foothill grassland (mesic, alkaline), vernal pools. Elevation ranges from 0 to 985 feet (0 to 300 meters). Blooms Apr–Jun.
San Francisco owl's-clover *Triphysaria floribunda*	Rank 1B.2	Coastal prairie, coastal scrub, valley and foothill grassland. Elevation ranges from 35 to 525 feet (10 to 160 meters). Blooms Apr–Jun.
coastal triquetrella *Triquetrella californica*	Rank 1B.2	Coastal bluff scrub, coastal scrub. Elevation ranges from 35 to 330 feet (10 to 100 meters). Moss that does not bloom.
	WILDLIFE	
	MAMMALS	
pallid bat *Antrozous pallidus*	SSC, WBWG High	Found in a variety of habitats ranging from grasslands to mixed forests, favoring open and dry, rocky areas. Roost sites include crevices in rock outcrops and cliffs, caves, mines, and hollow trees and various manmade structures such as bridges, barns, and buildings (including occupied buildings). Roosts must protect bats from high temperatures. Very sensitive to disturbance of roosting sites.
Townsend's big-eared bat *Corynorhinus townsendii*	SSC, WBWG High	Associated with a wide variety of habitats from deserts to higher elevation mixed and coniferous forests. Females form maternity colonies in buildings, caves and mines, and males roost singly or in small groups. Foraging typically occurs at edge habitats near wooded areas, e.g., along streams.
Steller (=Northern) sea lion *Eumetopias jubatus*	FD, MMC SSC	Breeds on Año Nuevo, San Miguel and Farallon islands, Point Saint George, and Sugarloaf. Hauls-out on islands and rocks. Needs haul-out and breeding sites with unrestricted access to water, near aquatic food supply and with no human disturbance.
hoary bat *Lasiurus cinereus*	WBWG Medium	Prefers open forested habitats or habitat mosaics, with access to trees for cover and open areas or habitat edges for feeding. Roosts in dense foliage of medium to large trees. Feeds primarily on moths.
fringed myotis *Myotis thysanodes*	WBWG High	Associated with a wide variety of habitats including dry woodlands, desert scrub, mesic coniferous forest, grassland, and sage-grass steppes. Buildings, mines and large trees and snags are important day and night roosts.
San Francisco dusky-footed woodrat *Neotoma fuscipes annectens*	SSC	Forest habitats of moderate canopy and moderate to dense understory, also in chaparral habitats. Constructs nests of shredded grass, leaves, and other material. May be limited by availability of nest-building materials.
big free-tailed bat *Nyctinomops macrotis*	SSC, WBWG med-high	Occurs rarely in low-lying arid areas. Requires high cliffs or rocky outcrops for roosting sites.

SPECIES	STATUS*	HABITAT
salt-marsh harvest mouse *Reithrodontomys raviventris*	FE, SE, CFP	Endemic to emergent salt and brackish wetlands of the San Francisco Bay Estuary. Pickleweed marshes are primary habitat; also occurs in various other wetland communities with dense vegetation. Does not burrow, builds loosely organized nests. Requires higher areas for flood escape.
Alameda island mole *Scapanus latimanus parvus*	SSC	Known only from Alameda Island. Found in a variety of habitats, especially annual and perennial grasslands. Prefers moist, friable soils. Avoids flooded soils.
Salt-marsh wandering shrew *Sorex vagrans halicoetes*	SSC	Salt marshes of the south arm of San Francisco Bay. Medium high marsh 6 to 8 feet above sea level where abundant driftwood is scattered among Salicornia.
American badger *Taxidea taxus*	SSC	Most abundant in drier open stages of most shrub, forest, and herbaceous habitats, with friable soils. Requires friable soils and open, uncultivated ground. Preys on burrowing rodents.
		BIRDS
great blue heron *Ardea herodias*	none (breeding sites protected by CDFW)	Year-round resident. Nests colonially or semi-colonially in tall trees and on cliffs, also sequestered terrestrial substrates. Breeding sites usually near foraging areas: marshes, lake margins, tidal flats, and rivers. Forages primarily on fishes and other aquatic prey, also smaller terrestrial vertebrates.
Short-eared owl *Asio flammeus*	SSC	Occurs year-round, but primarily as a winter visitor, breeding very restricted in most of California. Found in open, treeless areas (e.g., marshes, grasslands) with elevated sites for foraging perches and dense herbaceous vegetation for roosting and nesting. Preys mostly on small mammals, particularly voles.
burrowing owl *Athene cunicularia*	SSC	Year-round resident and winter visitor. Occurs in open, dry grasslands and scrub habitats with low-growing vegetation, perches and abundant mammal burrows. Preys upon insects and small vertebrates. Nests and roosts in old mammal burrows, most commonly those of ground squirrels.
marbled murrelet *Brachyramphus marmoratus*	FT, SE	Predominantly coastal marine. Nests in old-growth coniferous forests up to 30 miles inland along the Pacific coast, from Eureka to Oregon border, and in Santa Cruz/San Mateo Counties. Nests are highly cryptic, and typically located on platform-like branches of mature redwoods and Douglas firs. Forages on marine invertebrates and small fishes.
western snowy plover *Charadrius nivosus (alexandrines) nivosus*	FT, SSC, RP	Federal listing applies only to the Pacific coastal population. Year-round resident and winter visitor. Occurs on sandy beaches, salt pond levees, and the shores of large alkali lakes. Nests on the ground, requiring sandy, gravelly, or friable soils.

SPECIES	STATUS*	HABITAT
Northern harrier *Circus hudsonius*	SSC	Year-round resident and winter visitor. Found in open habitats including grasslands, prairies, marshes, and agricultural areas. Nests on the ground in dense vegetation, typically near water or otherwise moist areas. Preys on small vertebrates.
yellow rail *Coturnicops noveboracensis*	SSC	Summer resident in eastern Sierra Nevada in Mono County, breeding in shallow freshwater marshes and wet meadows with dense vegetation, also a rare winter visitor along the coast and other portions of the state. Extremely cryptic.
white-tailed kite *Elanus leucurus*	CFP	Year-round resident in coastal and valley lowlands with scattered trees and large shrubs, including grasslands, marshes, and agricultural areas. Nests in trees, of which the type and setting are highly variable. Preys on small mammals and other vertebrates.
American peregrine falcon *Falco peregrinus anatum*	FD, SD, CFP	Year-round resident and winter visitor. Occurs in a wide variety of habitats, though often associated with coasts, bays, marshes and other bodies of water. Nests on protected cliffs and on man-made structures including buildings and bridges. Preys on birds, especially waterbirds. Forages widely.
saltmarsh common yellowthroat *Geothlypis trichas sinuosa*	SSC	Resident of the San Francisco Bay region, in fresh and saltwater marshes. Requires thick, continuous cover down to water surface for foraging; tall grasses, tule patches, willows for nesting.
California black rail *Laterallus jamaicensis coturniculus*	ST, CFP	Year-round resident in marshes (saline to freshwater) with dense vegetation within four inches of the ground. Prefers larger, undisturbed marshes that have an extensive upper zone and are close to a major water source. Extremely secretive and cryptic.
Alameda song sparrow *Melospiza melodia pusillula*	SSC	Year-round resident of salt marshes bordering the south arm of San Francisco Bay. Inhabits primarily pickleweed marshes; nests placed in marsh vegetation, typically shrubs such as gumplant.
black-crowned night heron *Nycticorax nycticorax*	none (breeding sites protected by CDFW)	Year-round resident. Nests colonially, usually in trees but also in patches of emergent vegetation. Rookery sites are often on islands and usually located adjacent to foraging areas: margins of lakes and bays.
California Ridgway's rail *Rallus obsoletus obsoletus*	FE, SE, CFP	Year-round resident in tidal marshes of the San Francisco Bay estuary. Requires tidal sloughs and intertidal mud flats for foraging, and dense marsh vegetation for nesting and cover. Typical habitat features abundant growth of cordgrass and pickleweed. Feeds primarily on molluscs and crustaceans.

SPECIES	STATUS*	HABITAT
bank swallow *Riparia riparia*	ST	Summer resident in riparian and other lowland habitats near rivers, lakes, and the ocean in northern California. Nests colonially in excavated burrows on vertical cliffs and bank cuts (natural and manmade) with fine-textured soils. Historical nesting range in southern and central areas of California has been eliminated by habitat loss. Currently known to breed in Siskiyou, Shasta, and Lassen Cos., portions of the north coast, and along Sacramento River from Shasta Co. south to Yolo Co.
black skimmer *Rynchops niger*	SSC	Found primarily in southern California; South San Francisco Bay has a small resident population. Nests colonially on gravel bars, low islets, and sandy beaches
California least tern *Sternula antillarum browni*	FE, SE, CFP	Summer resident along the coast from San Francisco Bay south to northern Baja California; inland breeding also very rarely occurs. Nests colonially on barren or sparsely vegetated areas with sandy or gravelly substrates near water, including beaches, islands, and gravel bars. In San Francisco Bay, has also nested on salt pond margins.
	AMPHIBIANS	
California tiger salamander *Ambystoma californiense*	FE/FT, ST, RP	Populations in Santa Barbara and Sonoma counties currently listed as endangered; threatened in remainder of range. Inhabits grassland, oak woodland, ruderal and seasonal pool habitats. Adults are fossorial and utilize mammal burrows and other subterranean refugia. Breeding occurs primarily in vernal pools and other seasonal water features.
Santa Cruz black salamander *Aneides flavipunctatus niger*	SSC	Climbing salamanders of the genus *Aneides* frequent damp woodlands and are usually found hiding under various debris (i.e., bark, woodrat nests, logs). The Santa Cruz black salamander exists south of the San Francisco Bay and was only recently recognized as a separate and protected species. Santa Cruz black salamander is highly sedentary, preferring to stay hidden under riparian debris. Prey items include millipedes, spiders, and other insects (Stebbins and McGinnis 2012).
California giant salamander *Dicamptodon ensatus*	SSC	Occurs in the north-central Coast Ranges. Moist coniferous and mixed forests are typical habitat; also uses woodland and chaparral. Adults are terrestrial and fossorial, breeding in cold, permanent, or semi-permanent streams. Larvae usually remain aquatic for over a year.
foothill yellow-legged frog *Rana boylii*	SC, SSC	Found in or adjacent to rocky streams in a variety of habitats. Prefers partly shaded, shallow streams and riffles with a rocky substrate; requires at least some cobble-sized substrate for egg-laying. Needs at least 15 weeks to attain metamorphosis. Feeds on both aquatic and terrestrial invertebrates.

SPECIES	STATUS*	HABITAT
California red-legged frog *Rana draytonii*	FT, SSC, RP	Lowlands and foothills in or near permanent sources of deep water with dense, shrubby, or emergent riparian vegetation. Requires 11 to 20 weeks of permanent water for larval development. Associated with quiet perennial to intermittent ponds, stream pools and wetlands. Prefers shorelines with extensive vegetation. Disperses through upland habitats after rains.
	REPTILES	
green sea turtle *Chelonia mydas*	FT	Found in shallow waters inside reefs, bays and inlets with marine grass and algae. Open beaches with a sloping platform and minimal disturbance are required for nesting. This species exhibits high site fidelity.
western pond turtle *Emys marmorata*	SSC	A thoroughly aquatic turtle of ponds, marshes, rivers, streams, and irrigation ditches with aquatic vegetation. Require basking sites such as partially submerged logs, vegetation mats, or open mud banks, and suitable upland habitat (sandy banks or grassy open fields) for egg-laying.
San Francisco garter snake *Thamnophis sirtalis tetrataenia*	FE, SE, CFP, RP	Vicinity of freshwater marshes, ponds and slow-moving streams in San Mateo County and extreme northern Santa Cruz County. Prefers dense cover and water depths of at least one foot. Upland areas near water are also very important.
	FISHES	
green sturgeon - southern DPS *Acipenser medirostris*	FT, SSC	Spawn in the Sacramento River and the Feather River. Spawn at temperatures between 8–14 degrees C. Preferred spawning substrate is large cobble but can range from clean sand to bedrock.
tidewater goby *Eucyclogobius newberryi*	FE, SSC	Brackish water habitats along the California coast from Agua Hedionda Lagoon, San Diego County to the mouth of the Smith River. Found in shallow lagoons and lower stream reaches; requires still but not stagnant water and high oxygen levels.
delta smelt *Hypomesus transpacificus*	FT, SE	Lives in the Sacramento-San Joaquin estuary in areas where salt and freshwater systems meet. Occurs seasonally in Suisun Bay, Carquinez Strait and San Pablo Bay. Seldom found at salinities > 10 ppt; most often at salinities < 2 ppt.
hardhead *Mylopharodon conocephalus*	SSC	Found in low to mid-elevation streams in the Sacramento-San Joaquin drainage; also occurs in the Russian River and tributaries. Favors clear, deep pools with sand-gravel-boulder bottoms and slow water velocity. Not found where exotic Centrarchids predominate.
steelhead - central CA coast DPS *Oncorhynchus mykiss irideus*	FT	Occurs from the Russian River south to Soquel Creek and Pajaro River, also in San Francisco and San Pablo Bay Basins. Adults migrate upstream to spawn in cool, clear, well-oxygenated streams. Juveniles remain in fresh water for 1 or more years before migrating downstream to the ocean.

SPECIES	STATUS*	HABITAT
longfin smelt *Spirinchus thaleichthys*	FC, ST, SSC, RP	Euryhaline, nektonic and anadromous. Found in open waters of estuaries, mostly in middle or bottom of water column. Prefer salinities of 15 to 30 ppt but can be found in completely freshwater to almost pure seawater.
		INVERTEBRATES
Crotch bumble bee *Bombus crotchii*	SC	Range largely restricted to California, favoring grassland and scrub habitats. Typical of bumble bees, nests are usually constructed underground.
western bumble bee *Bombus occidentalis*	SC	Formerly common throughout much of western North America; populations from southern British Columbia to central California have nearly disappeared (Xerces 2015). Occurs in a wide variety of habitat types. Nests are constructed annually in pre-existing cavities, usually on the ground (e.g., mammal burrows). Many plant species are visited and pollinated.
San Bruno elfin butterfly *Callophrys mossii bayensis*	FE	Limited to the vicinity of San Bruno Mountain, San Mateo County. Colonies are located on rocky outcrops and cliffs in coastal scrub habitat on steep, north- facing slopes within the fog belt. Species range is tied to the distribution of the larval host plant, *Sedum spathulifolium.*
monarch butterfly *Danaus plexippus*	Winter roosts protected by CDFW	Winter roost sites extend along the coast from northern Mendocino to Baja California, Mexico. Roosts located in wind-protected tree groves (eucalyptus, Monterey pine, Monterey cypress), with nectar and water sources nearby.
Bay checkerspot butterfly *Euphydryas editha bayensis*	FT, RP	Restricted to native grasslands on outcrops of serpentine soil in the vicinity of San Francisco Bay. *Plantago erecta* is the primary host plant; *Orthocarpus densiflorus* and *O. purpurscens* are the secondary host plants.
Mission blue butterfly *Icaricia icarioides missionensis*	FE, RP	Inhabits grasslands and coastal chaparral of the San Francisco Peninsula and southern Marin County, but mostly found on San Bruno Mountain. Three larval host plants: *Lupinus albifrons, L. variicolor*, and *L. formosus*, of which *L. albifrons* is favored.
callippe silverspot butterfly *Speyeria callippe callippe*	FE	Two populations in San Bruno Mountain and the Cordelia Hills are recognized. Host plant is *Viola pedunculata*, which is found on serpentine soils. Most adults found on east-facing slopes; males congregate on hilltops in search of females.
Myrtle's silverspot butterfly *Speyeria zerene myrtleae*	FE, RP	Restricted to the fog belt of northern Marin and southernmost Sonoma County, including the Point Reyes peninsula; extirpated from coastal San Mateo County. Occurs in coastal prairie, dunes, and grassland. Larval foodplant is typically *Viola adunca*. Adult flight season may range from late June to early September.

*** Key to status codes:**
FE - Federal Endangered
FT - Federal Threatened
FD - Federal Delisted
SE - State Endangered
SR - State Rare
ST - State Threatened
SC - State Candidate
SSC - California Department of Fish and Wildlife Species of Special Concern
WBWG - Western Bat Working Group Priority Species
RP - Published Recovery Plan
MMC SSC - Marine Mammal Commission Species of Special Concern
CFP - California Department of Fish and Wildlife Fully Protected Animal
Rank 1A - California Rare Plant Rank 1A: Presumed extirpated in California and either rare or extinct elsewhere
Rank 1B - California Rare Plant Rank 1B: Plants rare, threatened, or endangered in California and elsewhere
Rank 1B.1 - California Rare Plant Rank 1B.1: Plants rare, threatened, or endangered in California and elsewhere (seriously threatened in California)
Rank 1B.2 - California Rare Plant Rank 1B.2: Plants rare, threatened, or endangered in California and elsewhere (moderately threatened in California)
Rank 1B.3 - California Rare Plant Rank 1B.3: Plants rare, threatened, or endangered in California and elsewhere (not very threatened in California)
Rank 2B - California Rare Plant Rank 2B: Plants rare, threatened, or endangered in California, but more common elsewhere
Rank 2B.1 - California Rare Plant Rank 2B.1: Plants rare, threatened, or endangered in California, but more common elsewhere (seriously threatened in California)
Rank 2B.2 - California Rare Plant Rank 2B.2: Plants rare, threatened, or endangered in California, but more common elsewhere (moderately threatened in California)
Rank 3 - California Rare Plant Rank 3: Plants about which more information is needed (a review list)
Rank 3.2 - California Rare Plant Rank 3.2: Plants about which more information is needed (a review list; moderately threatened in California)
Rank 4 - California Rare Plant Rank 4: Plants of limited distribution - a watch list
Rank 4.2 - California Rare Plant Rank 4.2: Plants of limited distribution - a watch list (moderately threatened in California)
Rank 4.3 - California Rare Plant Rank 4.3: Plants of limited distribution - a watch list (not very threatened in California)
Source: CNDDB 2023, CNPS 2023, and WRA 2023.

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WRA

Tobin Clark Property Biological Review (WRA Project# 29273-5)

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MEMORANDUM

TO:	Liz Ruess, Town of Hillsborough	**FROM:**	Rei Scampavia, Biologist
DATE:	February 22, 2023		
SUBJECT:	Tobin Clark Property Biological Review (WRA Project# 29273-5)		

1.0 PURPOSE

WRA, Inc. (WRA) has prepared this memorandum to summarize the methods, results, and conclusions of a biological review to analyze the proposed development of the Tobin Clark Property [Assessor's Parcel Numbers 038-281-300 and 038-281-310, located in the Town of Hillsborough (Town) in San Mateo County, California (Study Area; Attachment A, Figure 1)]. The proposed project would consist of the development of 100 units of mixed-income housing on the site. The purpose of this biological review is to document existing site conditions, describe the regulatory framework within which a future project could be evaluated, and to identify the areas subject to the Town's setback policies, regulatory permitting requirements, and/or other potential biological constraints.

2.0 SUMMARY OF RESULTS

Approximately 12.95 acres of the 21-acre Study Area is covered by sensitive land cover types. Sensitive terrestrial land cover types include needle grass grassland, coast live oak woodland, California buckeye groves, riparian California sagebrush scrub, riparian coast live oak woodland, and riparian California buckeye groves. Ephemeral streams are the only sensitive aquatic land cover type within the Study Area. Disturbance of any sensitive land cover types could be considered potentially significant under the California Environmental Quality Act (CEQA). Impacts to ephemeral streams may require permits from the U.S. Army Corps of Engineers (Corps), California Department of Fish and Wildlife (CDFW), and the Regional Water Quality Control Board (RWQCB); and impacts to riparian land cover may also require permits from CDFW and/or the RWQCB. The Town prohibits and development within 20-feet of any stream, and also requires an analysis of whether development would impact riparian vegetation within 50 feet of any stream. Any construction within this setback zone would need to be approved by the Town.

Six special-status plant species: bent-flowered fiddleneck [*Amsinckia lunaris*, California Native Plant Society (CNPS) Rare Plant Rank (Rank) 1B.2], Brewer's calandrinia (*Calandrinia breweri*, CNPS Rank 4.2), western leatherwood (*Dirca occidentalis*, CNPS Rank 1B.2), California bottle-brush grass (*Elymus californicus*, CNPS Rank 4.3), San Mateo woolly sunflower (*Eriophyllum latilobum*; federal endangered, state endangered, CNPS Rank 1B.1), and San Francisco owl's clover (*Triphysaria floribunda*, CNPS Rank 1B.2) have potential to occur within the Study Area. Two special-status wildlife species, hoary bat (*Lasiurus cinereus)* and San Francisco dusky-footed woodrat (*Neotoma fuscipes annectens)* have the potential to occur within the Study Area.

Minimization measures and best management practices are recommended in the Results section of this memorandum to avoid impacts to these resources.

3.0 REGULATORY BACKGROUND

3.1 Vegetation and Aquatic Communities

CEQA provides protections for vegetation types defined as sensitive by the CDFW, and aquatic features protected by laws and regulations administered by the Corps, State Water Resources Control Board (SWRCB), and RWQCB. The laws and regulations that provide protection for these resources are summarized below.

3.1.1 Sensitive Natural Communities

Sensitive natural communities include habitats that fulfill special functions or have special values. Natural communities considered sensitive are those identified in local or regional plans, policies, regulations, or by the CDFW. The CDFW ranks sensitive communities as "threatened" or "very threatened" (CDFW 2023a) and keeps records of their occurrences in its California Natural Diversity Database (CNDDB; CDFW 2023b). Natural communities are ranked 1 through 5 in the CNDDB based on NatureServe's (2023) methodology, with those communities ranked globally (G) or statewide (S) as 1 through 3 considered sensitive. Impacts to sensitive natural communities identified in local or regional plans, policies, or regulations or those identified by the CDFW, or U.S. Fish and Wildlife Service (USFWS), must be considered and evaluated under CEQA [California Code of Regulations (CCR) Title 14, Div. 6, Chap. 3, Appendix G]. In addition, this general class includes oak woodlands that are protected by local ordinances under the Oak Woodlands Protection Act and Section 21083.4 of the California Public Resources Code (CPRC).

3.1.2 Waters of the United States, Including Wetlands

The Corps regulates “Waters of the United States” under Section 404 of the Clean Water Act (CWA). Waters of the United States are defined in the Code of Federal Regulations (CFR) as including the territorial seas, and waters which are currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, such as tributaries, lakes and ponds, impoundments of waters of the U.S., and wetlands that are hydrologically connected with these navigable features (33 CFR 328.3). Potential wetland areas, according to the three criteria used to delineate wetlands as defined in the *U.S. Army Corps of Engineers Wetlands Delineation Manual* (Corps Manual; Environmental Laboratory 1987), are identified by the presence of (1) hydrophytic vegetation, (2) hydric soils, and (3) wetland hydrology. Unvegetated waters including lakes, rivers, and streams may also be subject to Section 404 jurisdiction, and are characterized by an ordinary high water mark (OHWM) identified based on field indicators such as the lack of vegetation, sorting of sediments, and other indicators of flowing or standing water. The placement of fill material into Waters of the United States generally requires a permit from the Corps under Section 404 of the CWA.

The Corps also regulates construction in navigable waterways of the U.S. through Section 10 of the Rivers and Harbors Act (RHA) of 1899 [33 U.S. Code (USC) 403]. Section 10 of the RHA requires Corps approval and a permit for excavation or fill, or alteration or modification of the course, location, condition, or capacity of any port, roadstead, haven, harbor, canal, lake, harbor, refuge, or enclosure within the limits of any breakwater, or of the channel of any navigable water

of the U.S. Section 10 requirements apply only to navigable waters themselves, and are not applicable to tributaries, adjacent wetlands, and similar aquatic features not capable of supporting interstate commerce.

3.1.3 Waters of the State, Including Wetlands

The term "Waters of the State" is defined by the Porter-Cologne Act as "any surface water or groundwater, including saline waters, within the boundaries of the state." The SWRCB and nine RWQCBs protect waters within this broad regulatory scope through many different regulatory programs. Waters of the State in the context of a CEQA biological review include wetlands and other surface waters protected by the *State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State* (SWRCB 2019). The SWRCB and RWQCB issue permits for the discharge of fill material into surface waters through the State Water Quality Certification Program, which fulfills requirements of Section 401 of the CWA and the Porter-Cologne Water Quality Control Act. Projects that require a Clean Water Act permit are also required to obtain a Water Quality Certification. If a project does not require a federal permit but does involve discharge of dredge or fill material into surface waters of the State, the SWRCB and RWQCB may issue a permit in the form of Waste Discharge Requirements.

3.1.4 Sections 1600-1616 of California Fish and Game Code

Streams and lakes, as habitat for fish and wildlife species, are regulated by CDFW under Sections 1600–1616 of the California Fish and Game Code (CFGC). Alterations to, or work within or adjacent to, streambeds or lakes generally require a 1602 Lake and Streambed Alteration Agreement. The term "stream," which includes creeks and rivers, is defined in the CCR as

> *"a body of water that flows at least periodically or intermittently through a bed or channel having banks and supports fish or other aquatic life [including] watercourses having a surface or subsurface flow that supports or has supported riparian vegetation."* (14 CCR 1.72).

The term "stream" can include ephemeral streams, dry washes, watercourses with subsurface flows, canals, aqueducts, irrigation ditches, and other means of water conveyance if they support aquatic life, riparian vegetation, or stream-dependent terrestrial wildlife (CDFG 1994). Riparian vegetation has been defined as "vegetation which occurs in and/or adjacent to a stream and is dependent on, and occurs because of, the stream itself" (CDFG 1994). Removal of riparian vegetation also requires a Section 1602 Lake and Streambed Alteration Agreement from the CDFW.

3.2 Special-status Species

3.2.1 Endangered and Threatened Plants, Fish, and Wildlife.

Specific species of plants, fish, and wildlife may be designated as threatened or endangered by the Federal Endangered Species Act (ESA), or the California Endangered Species Act (CESA). Specific protections and permitting mechanisms for these species differ under each of these acts, and a species' designation under one law does not automatically provide protection under the other.

The ESA (16 USC 1531 et seq.) is implemented by the USFWS and the National Marine Fisheries Service (NMFS). The USFWS and NMFS maintain lists of endangered and threatened plant and animal species (referred to as "listed species"). "Proposed" or "candidate" species are those that

are being considered for listing and are not protected until they are formally listed as threatened or endangered. Under the ESA, authorization must be obtained from the USFWS or NMFS prior to "take" of any listed species. "Take" under the ESA is defined as "harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct." "Take" under the ESA includes direct injury or mortality to individuals, disruptions in normal behavioral patterns resulting from factors such as noise and visual disturbance and impacts to habitat for listed species. Actions that may result in "take" of an ESA-listed species may obtain a permit under ESA Section 10, or via the interagency consultation described in ESA Section 7. Federal-listed plant species are only protected when "take" occurs on federal land.

The ESA also provides for designation of critical habitat, which are specific geographic areas containing physical or biological features "essential to the conservation of the species." Protections afforded to designated critical habitat apply only to actions that are funded, permitted, or carried out by federal agencies. Critical habitat designations do not affect activities by private landowners if there is no other federal agency involvement.

The CESA (CFGC 2050 et seq.) prohibits the "take" of any plant and animal species that the CFGC determines to be an endangered or threatened species in California. CESA regulations include "take" protection for threatened and endangered plants on private lands, as well as extending this protection to candidate species that are proposed for listing as threatened or endangered under CESA. The definition of a "take" under CESA ("hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill") only applies to direct impact to individuals, and does not extend to habitat impacts or harassment. CDFW may issue an Incidental Take Permit under CESA to authorize "take" if it is incidental to otherwise lawful activity and if specific criteria are met. "Take" of these species is also authorized if the geographic area is covered by a Natural Community Conservation Plan (NCCP), as long as the NCCP covers that activity.

3.2.2 Fully Protected Species and Designated Rare Plant Species

This category includes specific plant and wildlife species that are designated in the CFGC as protected even if not listed under CESA or ESA. Fully Protected Species includes specific lists of birds, mammals, reptiles, amphibians, and fish designated in CFGC. Fully protected species may not be taken or possessed at any time. No licenses or permits may be issued for "take" of fully protected species, except for necessary scientific research and conservation purposes. The definition of "take" is the same under the California Fish and Game Code and the CESA. By law, CDFW may not issue an Incidental Take Permit for Fully Protected Species. Under the California Native Plant Protection Act (NPPA), CDFW has listed 64 "rare" or "endangered" plant species, and prevents "take," with few exceptions, of these species. CDFW may authorize "take" of species protected by the NPPA through the Incidental Take Permit process, or under a NCCP.

3.2.3 Special Protections for Nesting Birds and Bats

The Federal Bald and Golden Eagle Protection Act provides relatively broad protections to both of North America's eagle species [bald eagle (*Haliaeetus leucocephalus*) and golden eagle (*Aquila chrysaetos*)] that in some regards are similar to those provided by the ESA. In addition to regulations for special-status species, most native birds in the United States, including non-status species, have baseline legal protections under the Migratory Bird Treaty Act of 1918 and CFGC, i.e., sections 3503, 3503.5 and 3513. Under these laws/codes, the intentional harm or collection of adult birds, as well as the intentional collection or destruction of active nests, eggs,

and young, is illegal. For bat species, the Western Bat Working Group (WBWG) designates conservation status for species of bats, and those with a high or medium-high priority are typically given special consideration under CEQA.

3.2.4 Species of Special Concern, Movement Corridors, and Other Special-status Species under CEQA

To address additional species protections afforded under CEQA, CDFW has developed a list of special species as, "a general term that refers to all of the taxa the CNDDB is interested in tracking, regardless of their legal or protection status." This list includes lists developed by other organizations, including for example, the Audubon Watch List Species, the Bureau of Land Management Sensitive Species, and USFWS Birds of Special Concern. Plant species on the CNPS Rare Plant Inventory (Inventory; CNPS 2023) with Ranks of 1 and 2, as well as some with a Rank of 3 or 4, are also considered special-status plant species and must be considered under CEQA. Some Rank 3 and Rank 4 species are typically only afforded protection under CEQA when such species are particularly unique to the locale (e.g., range limit, low abundance/low frequency, limited habitat) or are otherwise considered locally rare. Additionally, any species listed as sensitive within local plans, policies and ordinances are likewise considered sensitive. Movement and migratory corridors for native wildlife (including aquatic corridors) as well as wildlife nursery sites are given special consideration under CEQA.

3.3 Local Plans and Policies

3.3.1 Town of Hillsborough Tree Removal Guidelines

The Town of Hillsborough Municipal Code states that all tree removals related to the construction of property improvements, along with property improvement plans, require design review and approval from the Planning Department. For projects that classify as subdivisions, all subdivision maps or divisions of land filed for tentative approval shall designate all "trees" (woody plants which have a trunk diameter of 12 inches or more measured at 4.5 feet above natural grade, i.e., 'breast height') or "groves" (group of at least five woody plants of the same type with a diameter of 6 inches or greater measured at breast height) proposed to be removed, and those to be retained. Once approved, a permit must be obtained from the building department. Final approval of a map by the Town shall constitute a permit to remove any trees and/or groves designated on the tentative map as approved. An arborist report may be required for projects that propose removal of trees or groves.

3.3.2 Town of Hillsborough Stream Setback Policy

The Town has two regulations governing stream setbacks: (1) development is prohibited within 20 feet of the top of bank (TOB) of any stream, and (2) if any development is to occur between 20 and 50 feet from the TOB, a biologist must assess the project plans to ensure that no damage to the riparian area will occur.

4.0 METHODS

On February 6, 2023, WRA biologists Eliza Schlein and Rei Scampavia traversed the Study Area on foot to document existing conditions. The potential occurrence of special-status species in the overall Study Area was evaluated by first determining which special-status species occur in the vicinity of the Study Area through a literature and database search. Resources reviewed included the following:

- California Department of Fish and Wildlife (CDFW) Natural Diversity Database records (CNDDB; CDFW 2023a),
- U.S. Fish and Wildlife Service (USFWS) Information for Planning and Conservation Species Lists (USFWS 2023a),
- California National Plant Society (CNPS) Inventory records (CNPS 2023a),
- A Manual of California Vegetation Online (CNPS 2023b),
- Consortium of California Herbaria 2 (CCH2 2023),
- SoilWeb (CSRL 2023),
- Contemporary aerial photographs (Google Earth 2023),
- Historical aerial photographs (NETR 2023), and
- U.S. Fish and Wildlife Service (USFWS) National Wetlands Institute (NWI) Wetlands Mapper (USFWS 2023b).

During the site visit, land cover types within the Study Area were characterized, mapped, and classified as sensitive or non-sensitive. WRA also examined the Study Area for indicators of wetlands, non-wetland waters, and riparian habitat potentially subject to the jurisdiction of the Corps, the RWQCB, and/or the CDFW.

WRA assessed the Study Area for potential development-related constraints, including those imposed by the Town of Hillsborough setback policies. This analysis was performed to a level of detail necessary to understand what types of biological constraints may be associated with the project. The conclusions of this report are based on conditions observed at the time of the site visit and regulatory policies and practices in place at the time the report was prepared. Changes that may occur in the future regarding conditions, policies, or practices could affect the conclusions presented in this study.

5.0 RESULTS

5.1 Site Description

Maps of land cover types and potential biological constraints within the Study Area are included as Attachment A, Figures 3 and 4. A list of species observed within and around the Study Area is included as Attachment B. Representative site photographs are included as Attachment C. A list of special-status species documented to occur in the vicinity of the Study Area, and the habitats in which they occur, is included as Attachment D.

Most of the Study Area consists of steep slopes covered by woodlands and chaparral (Attachment A, Figure 2). Five ephemeral streams occur in the understory of chapparal and woodlands, and a sixth ephemeral stream runs along a segment of an unnamed trail, which occurs along the length of the Study Area. Openings alongside the unnamed trail are dominated by purple needle grass (*Stipa pulchra*) and non-native annual grasses. Elevations within the Study Area range from 330 to 600 feet World Geodetic System (WGS) 84 (Google Earth 2023). Soils within the Study Area consist of Urban Land; Orthents, cut and fill-Urban land complex, 5 to 75% slopes; Maymen gravelly loam, 30 to 50% slopes; and Los Gatos loam, 30 to 75% slopes (CSRL 2023).

The Study Area is surrounded by suburban residential housing to the north, east, and west, and by the College of San Mateo to the south. The College of San Mateo and suburban residences surrounding the Study Area, and unnamed trails within the Study Area, were constructed between 1956 and 1968 (NETR 2023). The Study Area has remained relatively unaltered since at least 1968 (NETR 2023). Borel Creek, an intermittent stream, borders the western and northern edges of the Study Area, and another unnamed intermittent stream runs parallel to the eastern boundary of the Study Area (Google Earth 2023, USFWS 2023b). Borel Creek connects to Seal Slough, a tributary of the San Francisco Bay, approximately 3 miles east of the Study Area.

5.2 Land Cover Types

A total of five non-sensitive and seven sensitive land cover types occur within the Study Area. Non-sensitive land cover types include developed areas, non-native annual grassland, California sagebrush scrub, chamise chaparral, and eucalyptus groves. Sensitive terrestrial land cover types include needle grass grassland, coast live oak woodland, California buckeye groves, riparian California sagebrush scrub, riparian coast live oak woodland, and riparian buckeye groves. Ephemeral streams are the only sensitive aquatic land cover type within the Study Area. Acreages of these land cover types are summarized in Table 1. Representative photographs of land cover types are included in Attachment C.

Table 1: Vegetation Communities and Other Land Cover Types

COMMUNITY / LAND COVERS	SENSITIVE STATUS	RARITY RANKING	ACRES WITHIN STUDY AREA
TERRESTRIAL / COMMUNITY LAND COVER			
Developed areas	Non-sensitive	N/A	1.11
Non-native annual grassland	Non-sensitive	SNA/GNA	2.17
California sagebrush scrub	Non-sensitive	S5/G5	1.98
Chamise chaparral	Non-sensitive	S5/G5	2.79
Eucalyptus groves	Non-sensitive	SNA/GNA	0.04
Needle grass grassland	Sensitive	S3S4/G3G4	0.76
Coast live oak woodland	Sensitive	S4/G5	10.58
California buckeye groves	Sensitive	S3/G3	0.09
Riparian California sagebrush scrub	Sensitive	S5/G5	0.26
Riparian coast live oak woodland	Sensitive	S4/G5	0.12
Riparian buckeye groves	Sensitive	S3/G3	1.01
AQUATIC RESOURCES			
Ephemeral stream	Sensitive	N/A	0.13

Land cover types within the Study Area are described below.

5.2.1 Non-Sensitive Land Cover Types

The Study Area includes five non-sensitive land cover types: developed areas, non-native annual grassland, California sagebrush scrub, chamise chaparral, and eucalyptus groves. Developed areas within the Study Area include a paved trail and two former staging areas adjacent to the paved trail. Developed areas within the Study Area are largely unvegetated, except for scattered infestations of stinkwort (*Dittrichia graveolens*), a non-native invasive herbaceous species. This land cover type does not meet the membership requirements of any vegetation alliances and is not considered sensitive by any regulatory entities.

Non-native annual grassland occurs along the sides of the paved trail, along an unmaintained dirt trail in the northwestern portion of the Study Area, and within openings of chaparral. Non-native annual grassland within the Study Area is dominated by Italian rye grass (*Festuca perennis*) and Mediterranean barley (*Hordeum marinum*), with lower cover of other non-native annual grasses such as rattlesnake grass (*Briza maxima*) and soft chess (*Bromus hordeaceus*). Non-native forbs are also present, including Italian thistle (*Carduus pycnocephalus*), stork's bill (*Erodium* spp.), and tocalote (*Centaurea melitensis*). Grasses and forbs were still in the seedling stage at the time of the February 6, 2023 site visit, and dominant species within this land cover type may shift as plants mature. Species richness and composition varies throughout the Study Area, and this land cover type is a mosaic of several vegetation alliances that are too intermixed to map separately, such as the *Festuca perennis* (*Lolium perenne*) Herbaceous Semi-Natural Alliance, and the *Avena* spp. – *Bromus* spp. Herbaceous Semi-Natural Alliance. None of these vegetation alliances are considered sensitive by the CDFW.

California sagebrush scrub occurs in the western portion of the Study Area, within openings of coast live oak woodland. The canopy is open, with a moderately dense shrub layer dominated by California sagebrush (*Artemisia californica*). In some areas, poison oak (*Toxicodendron diversilobum*) is co-dominant with California sagebrush. Sticky monkeyflower (*Diplacus aurantiacus*), coyote brush (*Baccharis pilularis*), and immature coast live oak (*Quercus agrifolia*) also occur at lower densities in the shrub layer. Dominant herbaceous species include amole (*Chlorogalum pomeridianum*), pink honeysuckle (*Lonicera hispidula*), and purple needle grass. Vegetation within this land cover type meets the membership rules of the *Artemisia californica* Shrubland Alliance, due to the dominance of California sagebrush. This vegetation alliance is not considered sensitive by the CDFW.

Chamise chapparal occurs in openings in coast live oak woodland on steep slopes throughout the Study Area. The canopy is open, with a dense shrubby layer dominated by chamise (*Adenostoma fasciculatum*). Blueblossom (*Ceanothus thyrsiflorus*), sticky monkeyflower, toyon (*Heteromeles arbutifolia*), poison oak, and immature coast live oak are present at very low densities within this land cover type. The understory is mostly bare, with scattered amole, gold back fern (*Pentagramma triangularis*), grasses, and forbs. Vegetation within this land cover type meets the membership rules of the *Adenostoma fasciculatum* Shrubland Alliance, due to the dominance of chamise. This vegetation alliance is not considered sensitive by the CDFW.

Two eucalyptus groves occur on steep slopes in the eastern portion of the Study Area, along the southern border. Eucalyptus groves within the Study Area are characterized by monotypic stands of blue gum (*Eucalyptus globulus*), with an understory dominated by non-native species such as Italian thistle, pampas grass (*Cortaderia selloana*), stinkwort, and Bermuda buttercup (*Oxalis pes-caprae*). Eucalyptus groves occupy only a small fraction of the Study Area; however,

eucalyptus groves within the Study Area are connected to larger, distinct patches that extend beyond the Study Area boundary. Eucalyptus groves were therefore mapped as a separate land cover type. Due to the dominance of blue gum in the canopy, this land cover type meets the membership requirements of the *Eucalyptus* spp. Woodland Semi-Natural Alliance. This vegetation alliance is not considered sensitive by CDFW.

5.2.2 Sensitive Land Cover Types

The Study Area includes five sensitive terrestrial land cover types (needle grass grassland, coast live oak woodland, California buckeye groves, riparian California sagebrush scrub, riparian coast live oak woodland, and riparian buckeye groves) and one sensitive aquatic land cover type (ephemeral streams).

Six ephemeral streams, which exhibit indicators of an OHWM and convey flows only during or immediately after a precipitation event but remain dry otherwise, occur within the Study Area. Of these six ephemeral streams, three originate from culverts within or just outside the Study Area, and two originate in upland areas. The origin of the westernmost stream was not determined due to unsafe conditions, although it appears to be an overgrown culvert just outside the Study Area. Ephemeral streams within the Study Area were largely inaccessible due to steep, sometimes unstable slopes, and dense vegetative growth. Ephemeral streams were therefore mapped using a combination of topographic maps and ground truthing. At the time of the February 6, 2023 site visit, which occurred a few days after a precipitation event, ephemeral streams within the Study Area contained 1 to 2 inches of flowing water. The OHWMs are indicated by scour, change in vegetation, and a break in slope. Streambeds below the OHWM range from 2 to 8 feet in width, are mostly unvegetated, and are composed of a combination of bedrock, gravel, cobble, and earthen substrates. Tops of bank along the ephemeral streams are characterized by a break in slope, and the channels range from approximately 2 to 30 feet in width at TOB within the Study Area. The banks of the three westernmost ephemeral streams are nearly vertical and unvegetated. The banks of the three easternmost ephemeral streams host riparian California buckeye groves, which are described below. Five of the six ephemeral streams within the Study Area are tributary to Borel Creek, which connects to the San Francisco Bay. The sixth ephemeral stream, south of the unnamed paved trail, is connected to another ephemeral stream within the Study Area via a swale that does not exhibit wetland indicators or evidence of an OHWM. Impacts to aquatic resources receive consideration under CEQA, thus ephemeral stream is considered sensitive for the purposes of this memorandum.

Needle grass grassland occurs in upland clearings adjacent to the unnamed trail that occurs along the length of the Study Area. This land cover type is characterized by an open canopy, with an herbaceous layer dominated by purple needle grass, with lower cover by oats (*Avena* sp.) and beardless wild rye (*Elymus triticoides*). Other herbaceous forbs present within this land cover type include yarrow, amole, and clover (*Trifolium* sp.). Although purple needle grass grassland was recently lumped by the CDFW into the needle grass – Melic Grassland Alliance, which is considered apparently secure globally and in California (i.e., G4, S4), purple needle grass grassland within the Study Area fits within the membership rules of the *Stipa* [*Nassella*] *pulchra* – *Avena* spp. Association, which is considered sensitive by CDFW (CDFW 2023b).

Coast live oak woodland is the most extensive land cover type within the Study Area. This land cover type is dominated by coast live oak in the canopy, with lower cover by California bay (*Umbellularia californica*) and buckeye (*Aesculus californica*). The shrub layer is dominated by

chamise, coyote brush, and toyon. The herbaceous understory is dominated by a mix of natives and non-natives, including yarrow (*Achillea millefolium*), Italian thistle, amole, gold back fern, and purple needle grass. Vegetation within this land cover type meets the membership requirements for the *Quercus agrifolia* Forest and Woodland Alliance, due to the dominance of coast live oak in the canopy. Although this alliance is not considered sensitive by the CDFW, Chapter 14 of the Ordinance of the Town of Hillsborough Municipal Code (Tree Ordinance) prioritizes the preservation of forested stands of oak. This land cover type is therefore considered sensitive for the purposes of this memorandum.

One stand of upland buckeye groves occurs in an upland wooded area in the eastern portion of the Study Area. This land cover type is dominated by buckeye in the canopy, with lower cover by coast live oak and California bay. The understory is dominated by toyon and poison oak, with an understory composed of forbs and ferns, including cleavers (*Galium aparine*), Bermuda buttercup, purple sanicle, California maidenhair fern (*Adiantum jordanii*), and western bracken fern (*Pteridium aquilinum*). Vegetation within this land cover type meets the membership requirements for the *Aesculus californica* Woodland Alliance, which is considered sensitive by CDFW.

Riparian California sagebrush scrub, riparian coast live oak woodland, and riparian buckeye groves occur within the Study Area, along ephemeral drainages. Riparian habitat consists of woody-species-dominated vegetation that grows as a result of, or contributes organic material to, streams within the Study Area. The edge of riparian woodland was determined by a combination of topography and community composition surrounding stream corridors within the Study Area. Dense, continuous canopy cover resulted in low GPS accuracy, and an accurate boundary of mixed riparian woodland could not be mapped based on GPS data or aerial signature; therefore, for the purposes of this memorandum, mixed riparian woodland was modelled as the average distance of the riparian corridor from TOB observed in the field, which was 30 feet for tree-dominated land cover types, and 15 feet for shrub-dominated land cover types. Riparian land cover types were similar in plant composition to their non-riparian equivalents within the Study Area. Impacts to riparian habitat receive consideration under CEQA, thus, riparian land cover types are considered sensitive for the purposes of this memorandum.

5.2.3 Special-status Plant Species

No special-status plant species were observed in the Study Area during the site assessment. Ninety-six (96) special-status plant species have been documented within the vicinity of the Study Area (CDFW 2023a, CNPS 2023a; Attachment D). Of these 96 species, 90 are unlikely or have no potential to occur in the Study Area due to one or more of the following reasons:

- Specific edaphic conditions, such as serpentine or clay soils, are absent;
- Specific hydrologic conditions, such as seasonal wetlands or tidal waters, are absent;
- Unique pH conditions necessary to support the special-status plant species are absent;
- Common associated plant species and vegetation communities are absent; and
- A viable seed bank is unlikely to be present due to historic and contemporary soil alterations of the surrounding area.

Six special-status plant species: bent-flowered fiddleneck [*Amsinckia lunaris*, CNPS Rare Plant Rank (Rank) 1B.2], Brewer's calandrinia (*Calandrinia breweri*, CNPS Rank 4.2), western leatherwood (*Dirca occidentalis*, CNPS Rank 1B.2), California bottle-brush grass (*Elymus*

californicus, CNPS Rank 4.3), San Mateo woolly sunflower (*Eriophyllum latilobum*; federal endangered, state endangered, CNPS Rank 1B.1), and San Francisco owl's clover (*Triphysaria floribunda*, CNPS Rank 1B.2) have potential to occur within the Study Area. These species are discussed below.

BENT-FLOWERED FIDDLENECK (*Amsinckia lunaris*), CNPS RANK 1B.2. HIGH POTENTIAL.

Bent-flowered fiddleneck is an annual forb in the forget-me-not family (*Boraginaceae*) that blooms from March to June. It typically occurs in open areas within cismontane woodland, valley and foothill grassland, and coastal bluff scrub habitat often underlain by clay substrate at elevations ranging from 10 to 1,625 feet (CDFW 2023a, CNPS 2023a, Jepson eFlora 2023). Associated species include coast live oak, blue oak (*Quercus douglasii*), California juniper (*Juniperus californicus*), buck brush (*Ceanothus cuneatus*), poison oak, miniature lupine (*Lupinus bicolor*), foothill lotus (*Acmispon brachycarpus*), calf lotus (*A. wrangelianus*), fringe pod (*Thysanocarpus curvipes*), q-tips (*Micropus californicus*), cream cups (*Platystemon californicus*), slender tarweed (*Madia gracilis*), yarrow, gold back fern, one-sided bluegrass (*Poa secunda*), woolly sunflower (*Eriophyllum lanatum*), and slender wild oat (*Avena barbata*) (CDFW 2023a). Bent-flowered fiddleneck is known from Alameda, Contra Costa, Colusa, Lake, Marin, Napa, San Benito, Santa Clara, Santa Cruz, San Mateo, and Yolo counties (CNPS 2023a). The nearest documented occurrence is from 1994, adjacent to Crystal Springs Road, approximately 0.5 mile west of the Study Area. Bent-flowered fiddleneck has high potential to occur in openings in ruderal vegetation, buckeye groves, and coast live oak woodland within the Study Area due to the presence of suitable habitat, associated species, and close proximity to a documented occurrence.

BREWER'S CALANDRINIA (*Calandrinia breweri*), CNPS RANK 4.2. MODERATE POTENTIAL.

Brewer's calandrinia is an annual forb in the purslane family (*Montiaceae*) that blooms from March to June. It typically occurs in recently burned or disturbed sites on sandy and loamy substrate in chaparral and coastal scrub habitat at elevations ranging from 30 to 3,965 feet (CNPS 2023a). Associated species are not reported in the literature. Brewer's red maids are known from 23 USGS 7.5-minute quadrangles in Contra Costa, Los Angeles, Marin, Mariposa, Mendocino, Monterey, Napa, Orange, Riverside, Santa Barbara, San Bernardino, Santa Clara, Santa Cruz, San Diego, Shasta, San Luis Obispo, Sonoma, and Ventura counties (CNPS 2023a). The nearest documented occurrence is from wooded habitat in San Carlos, 7.5 miles south of the Study Area (CCH2 2023). Brewer's calandrinia has moderate potential to occur in chaparral and scrub habitat within the Study Area due to the presence of suitable habitat along disturbed edges of scrub and chaparral.

WESTERN LEATHERWOOD (*Dirca occidentalis*), CNPS RANK 1B.2. HIGH POTENTIAL.

Western leatherwood is a deciduous shrub in the mezereum family (*Thymelaeaceae*) that blooms from January to April but is typically identifiable via vegetative structures into late summer and/or early fall. It typically occurs on brushy, mesic slopes within partial shade of broadleaf upland forest, chaparral, closed-cone coniferous forest, cismontane woodland, North Coast coniferous forest, riparian forest, and riparian woodland habitat at elevations ranging from 165 to 1,285 feet (CDFW 2023, CNPS 2023a, Jepson eFlora 2023). Associated species include coast live oak, California bay, Pacific madrone (*Arbutus menziesii*), California coffeeberry (*Frangula californica*), poison oak, toyon, California buckeye, California hazelnut (*Corylus cornuta* var. *californica*), coyote brush, yerba buena (*Clinopodium douglasii*), Pacific sanicle (*Sanicula crassicaulis*), and Douglas iris (*Iris douglasiana*) (CDFW 2023a). The nearest documented

occurrence is from 2007, approximately 0.4 mile southwest of the Study Area near Crystal Springs Road (CDFW 2023a). Western leatherwood has high potential to occur on wooded slopes within the Study Area due to the presence of associated species in suitable habitat, and close proximity to a documented occurrence.

CALIFORNIA BOTTLE-BRUSH GRASS (*Elymus californicus*), CNPS RANK 4.3. HIGH POTENTIAL.

California bottle-brush grass is a perennial graminoid in the grass family (*Poaceae*) that blooms from May to November. It typically occurs along stream banks or other mesic sites within broadleaf upland forest, cismontane woodland, North Coast coniferous forest, and riparian woodland habitat at elevations ranging from 45 to 1,530 feet (CNPS 2023a). Associated species include coast live oak and California bay (CCH2 2023). California bottle-brush grass is known from Marin, Santa Cruz, San Mateo, and Sonoma counties (CNPS 2023a). The nearest documented occurrence is from 1994, adjacent to Crystal Springs Road, approximately 0.5 mile west of the Study Area (CCH2 2023). California bottle-brush grass has a high potential to occur on wooded slopes within the Study Area due to the presence of associated species in suitable habitat.

SAN MATEO WOOLLY SUNFLOWER (*Eriophyllum latilobum*), FEDERAL ENDANGERED, STATE ENDANGERED, CNPS RANK 1B.1. HIGH POTENTIAL.

San Mateo woolly sunflower is a 12- to 16-inch-tall perennial herb in the sunflower family (*Asteraceae*) that blooms from May to June. It typically occurs in cismontane woodland, coastal scrub, and lower montane coniferous forest at elevations ranging from approximately 150 to 1,085 feet (CDFW 2023a, CNPS 2023a). It often occurs on road cuts and shady slopes (CDFW 2023a). This species has a serpentine affinity rank of strict endemic (5.5) (Safford and Miller 2020), although it is found on and off serpentine. Associated species include coast live oak, buckeye, California bay, foothill needle grass (*Stipa lepida*), and white fairy lantern (*Calochortus albus*) (CDFW 2023a). The nearest documented occurrence is from 2015, adjacent to Crystal Springs Road, approximately 0.5 mile west of the Study Area (CDFW 2023a). San Mateo woolly sunflower has a moderate potential to occur within the Study Area due to the presence of nearby occurrences, shady slopes, and associated species. San Mateo woolly sunflower has a high potential to occur on wooded slopes within the Study Area due to the presence of associated species in suitable habitat.

SAN FRANCISCO OWL'S CLOVER (*Triphysaria floribunda*). CNPS RANK 1B.2. MODERATE POTENTIAL.

San Francisco owl's-clover is an annual forb in the broomrape family (*Orobanchaceae*) that blooms from April through June. It typically occurs in serpentine substrate in coastal prairie, coastal scrub, and valley and foothill grassland at elevations ranging from 30 to 520 feet (CNPS 2023a, CDFW 2023a). This species has a serpentine affinity rank of weak indicator (2.3) (Safford et al. 2020). Associated species include coyote brush, evergreen huckleberry (*Vaccinium ovatum*), Douglas iris (*Iris douglasiana*), blue-eyed grass (*Sisyrinchium bellum*), California buttercup (*Ranunculus californicus*), tufted hair grass (*Deschampsia cespitosa*), and Pacific reed grass (*Calamagrostis nutkaensis*) (CDFW 2023a). The nearest documented occurrence of this species is 1 mile west of the Study Area, near Crystal Springs Lake. This species has moderate potential to occur within the Study Area due to the presence of suitable habitat and associated species.

5.2.4 Special-status Wildlife Species

No special-status wildlife species were observed in the Study Area during the site assessment. Fifty (50) special-status wildlife species have been documented within the vicinity of the Study Area (CDFW 2023a, USFWS 2023; Attachment D). Forty-eight (48) of these species are unlikely to occur or have no potential to occur in the Study Area due to one or more of the following reasons:

- Coastal habitats and beaches are not present;
- Streams do not connect to tidal sources;
- Vegetation communities (e.g., tidal or freshwater marsh, grassland, and old-growth coniferous forest) that provide nesting and/or foraging resources necessary to support special-status wildlife species are not present;
- Structures or vegetation (e.g., caves, small mammal burrows) necessary to provide nesting or cover habitat to support special-status wildlife species are not present;
- Host plants necessary to provide larval and nectar resources required for the completion of life cycles for specific special-status insects are not present; and,
- The Study Area is outside of special-status wildlife species' documented range.

Two (2) special-status wildlife species were determined to have potential to occur within the Study Area: hoary bat [*Lasiurus cinereus*, Western Bat Working Group (WBWG) Medium Priority] and San Francisco dusky-footed woodrat (*Neotoma fuscipes annectens*, CDFW Species of Special Concern). These species are discussed below. Although the Study Area is within relative proximity to the documented range of the federal-listed California red-legged frog (*Rana draytonii* Federal Threatened), there are total barriers to movement/dispersal in all directions and no hydrological connectors. As such, this species is unlikely to occur and will not be discussed further.

HOARY BAT (*Lasiurus cinereus)* WESTERN BAT WORKING GROUP MEDIUM PRIORITY SPECIES; MODERATE POTENTIAL TO OCCUR WITHIN THE STUDY AREA (ROOSTING).

Hoary bats are highly associated with forested habitats in the western United States. This species is solitary and roosts primarily in foliage of both coniferous and deciduous trees, near the ends of branches, usually at the edge of a clearing. Roosts are typically 10 to 30 feet above the ground. Roosting has also been documented in caves, beneath rock ledges, and in tree cavities and squirrel nests. Hoary bats are thought to be migratory; however, wintering sites and migratory routes have not been well documented. This species tolerates a wide range of temperatures and has been captured at air temperatures between 32 and 72 degrees. Hoary bats likely mate in the fall, with delayed implantation leading to birth in May through July. This species typically emerges relatively late in the evening to forage, e.g., from over one hour after sunset to after midnight.

Hoary bats have the potential to roost in the buckeye and oak trees in the Study Area. The prevalence of edge habitat throughout the property would also create feeding opportunities for the species. The multitude of streams that run through the Study Area provide habitat breaks that would attract the species to the area; therefore, it is considered to have moderate potential to occur within the Study Area.

SAN FRANCISCO DUSKY-FOOTED WOODRAT *(Neotoma fuscipes annectens)* CDFW SPECIES OF SPECIAL CONCERN; MODERATE POTENTIAL TO OCCUR WITHIN THE STUDY AREA.

This subspecies of the dusky-footed woodrat occurs in the Coast Ranges between San Francisco Bay and the Salinas River (Matocq 2003). Occupied habitats are variable and include forest, woodland, riparian areas, and chaparral. Woodrats feed on woody plants, but will also consume fungi, grasses, flowers, and acorns. Foraging occurs on the ground and in bushes and trees. This species constructs robust stick houses/structures in areas with moderate cover and a well-developed understory containing woody debris. Breeding takes place from December to September. Individuals are active year-round and are generally nocturnal.

The heavily wooded riparian corridors throughout the Study Area offer highly suitable habitat for San Francisco dusky-footed woodrat. No woodrat structures were observed during the site visit, but the riparian areas contained well-developed understories that would provide this species with ample den building material. Additionally, the surrounding chapparal landscape would also support this species; therefore, San Francisco dusky-footed woodrat is considered to have moderate potential to occur within the Study Area.

6.0 RECOMMENDED AVOIDANCE AND MINIMIZATION MEASURES

Currently, no plans have been proposed for the Study Area. As a result, specific impacts to the Study Area cannot be directly evaluated. Potential constraints are depicted in Attachment A, Figure 4. General avoidance and minimization measures that will limit any impacts to sensitive habitat types or special-status species are discussed below.

6.1 Sensitive Terrestrial and Aquatic Land Cover Types

6.1.1 Potential Impacts

One sensitive aquatic (ephemeral stream) and six sensitive terrestrial (needle grass grassland, coast live oak woodland, California buckeye groves, riparian California sagebrush scrub, riparian coast live oak woodland, and riparian California buckeye groves) land cover types occur within the Study Area. Streams within the Study Area may be considered jurisdictional by regulatory agencies such as the Corps, CDFW, and RWQCB. Riparian land cover may additionally be regulated by the RWQCB and CDFW, and needle grass grassland and upland California buckeye groves may be regulated by CDFW.

The Town has two regulations governing stream setbacks. Under Town regulations, development is prohibited within 20 feet of the TOB of any stream. If any development is to occur between 20 and 50 feet from the TOB, a biologist must assess the project plans to ensure that no damage to the riparian area will occur; therefore, all streams and riparian land cover within the Study Area are within the Town setback, and some portions of upland coast live oak woodland, upland chamise, developed areas, and non-native annual grassland fall within the Town stream setback as well (Attachment A, Figure 4).

Furthermore, tree removal within coast live oak woodland may be regulated by the Town of Hillsborough Tree Ordinance (Tree Ordinance), discussed below under "Trees." Direct impacts to these land cover types, such as the placement or removal of fill, vegetation removal, and equipment access, and indirect impacts to aquatic land cover types, such as erosion or runoff, would be considered potentially significant under CEQA.

6.2 Recommended Avoidance and Minimization Measures

Direct impacts to sensitive aquatic or terrestrial land cover types may require permits from the regulatory agencies with jurisdiction over that land cover type within the Study Area, and/or avoidance, minimization, and mitigation measures per the CEQA environmental review process as described above. If no direct impacts are anticipated for sensitive terrestrial and aquatic land cover types, indirect impacts such as incidental spills, erosion, and siltation may still occur. These should be avoided or minimized using construction best management practices (BMPs). These BMPs should be included on the final site plans to ensure work crew compliance.

6.2.1 Special-Status Plant Species

POTENTIAL PROJECT IMPACTS

Six special-status plant species (bent-flowered fiddleneck, Brewer's calandrinia, western leatherwood, California bottle-brush grass, San Mateo woolly sunflower, and San Francisco owl's clover) have potential to occur within the Study Area. Bent-flowered fiddleneck, Brewer's

calandrinia, and San Francisco owl's clover have potential to occur in openings within the Study Area, and Brewer's calandrinia, western leatherwood, California bottle-brush grass, San Mateo woolly sunflower, and San Francisco owl's clover have potential to occur on wooded and brushy slopes within the Study Area. Impacts to bent-flowered fiddleneck, western leatherwood, San Mateo woolly sunflower, and San Francisco owl's clover would be considered potentially significant under CEQA. Although impacts to CNPS Rank 4 species are not always considered significant under CEQA, California bottle-brush, if present within the Study Area, would be on the eastern periphery of its documented range. Impacts to this species within the Study Area could therefore also be considered potentially significant under CEQA (CNPS 2020). Impacts to Brewer's calandrinia would not be considered potentially significant under CEQA; however, populations within the Study Area would not meet any of the requirements for CNPS Rank 4 species to be considered under CEQA (CNPS 2020).

RECOMMENDED AVOIDANCE AND MINIMIZATION MEASURES

To reduce potential impacts to special-status plants to less than significant, one or more focused surveys should be conducted prior to any ground disturbance or vegetation removal to determine the presence or absence of the three special-status plant species with potential to occur within the Study Area. The surveys should follow the protocol for rare plant surveys described by CNPS (2001) and CDFW (CDFW 2018). These guidelines require special-status plant surveys to be conducted at the proper time of year when rare or endangered species are both "evident" and identifiable. Field surveys should be scheduled to coincide with known blooming periods, and/or during periods of physiological development that are necessary to identify the plant species of concern. If no special-status plant species are found, then no additional mitigation measures are necessary. If any of the species are found and cannot be avoided by construction activities within the Study Area, the following measures shall be required:

- If the surveys determine that one or more special-status plant species are present within the Study Area, direct and indirect impacts on the species should be avoided where feasible through the establishment of activity exclusion zones, where no ground-disturbing activities will take place, including construction staging or other temporary work areas.
- Activity exclusion zones for special-status plant species should be established prior to activities around each occupied habitat site, the boundaries of which should be clearly marked with standard orange plastic construction exclusion fencing or its equivalent. The size of activity exclusion zones may be determined through consultation with a qualified biologist.
- If exclusion zones and avoidance of impacts to special-status species within the Study Area are not feasible, then the loss of individuals or occupied habitat of special-status plants should be compensated for through the acquisition, protection, and subsequent management of existing occurrences.
- Before the implementation of compensation measures, the Project's applicant should provide detailed information to the lead agency on the quality of preserved habitat, location of the preserved occurrences, provisions for protecting and managing the areas, the responsible parties involved, and other pertinent information that demonstrates the feasibility of the compensation.
- A mitigation plan identifying appropriate mitigation ratios at a minimum ratio of 1:1 should be developed in consultation with, and approved by, the lead agency prior to the

commencement of any activities that would impact special-status plant species that occur within the Study Area.
    - A mitigation plan may include but is not limited to the following:
        - transplantation of perennial species and/or reseeding of annual species in other suitable portions of the Study Area,
        - the acquisition of off-site mitigation areas presently supporting the special-status species within the Study Area,
        - purchase of credits in a mitigation bank that is approved to sell credits for special-status plants, or
        - payment of in-lieu fees to a public agency or conservation organization (e.g., a local land trust) for the preservation and management of existing populations of special-status plants.
- Transplantation and/or reseeding of special-status species will require a monitoring plan to ensure successful establishment.

In addition to these measures, if pre-construction surveys find that San Mateo woolly sunflower is present within the Study Area or access routes and cannot be avoided, consultation may be required with the USFWS and CDFW to assess impacts to this listed species. Consultation may result in additional conservation measures to further reduce any imposed effects resulting from building activities at the time of construction. Impacts to this species will also require consultation with the CDFW to obtain an Incidental Take Permit. If this species is found to be absent, formal consultation would not be required.

6.2.2 Hoary Bat (*Lasiurus cinereus*)

POTENTIAL PROJECT IMPACTS

Hoary bat has the potential to roost within the coast live oak woodland and within the riparian and non-riparian California buckeye groves. In addition, non-status bat species may also be present in the Study Area. Any tree removal or trimming of large limbs associated with project activities could adversely impact roosting bats either through disturbance or direct mortality.

RECOMMENDED AVOIDANCE AND MINIMIZATION MEASURES

To the extent feasible, any tree removal or trimming should be conducted outside of the bat maternity season (generally April through October). If this work window is not feasible, pre-construction bat roost assessments conducted by a qualified biologist at least 14 days and no more than 30 days prior to removal are recommended to determine if bats roosts are present which may be impacted by project activities. If special-status bat species or maternity roosts are detected during these surveys, additional measures including avoidance of the roost sites until the end of the maternity roosting season may be recommended. Regardless of the timing of tree removal or trimming activities, all felled trees or large limbs should remain on the ground for at least 24 hours prior to chipping, off-site removal, or other processing to allow any roosting individual bats to vacate the premises of their own volition.

6.2.3 San Francisco Dusky-Footed Woodrat (*Neotoma fuscipes annectens*)

POTENTIAL PROJECT IMPACTS

San Francisco dusky-footed woodrat have potential to nest along the riparian corridors surrounding the six ephemeral streams. No woodrat structures were observed during the

February 6, 2023, site visit; however, there was very dense vegetation that was not easily accessible in many of the riparian habitats. Vegetation removal and grading within riparian communities could result in impacts to suitable habitat for this species.

RECOMMENDED AVOIDANCE AND MINIMIZATION MEASURES

Prior to initial ground disturbance or vegetation removal, pre-construction surveys for woodrat stick nests should occur in all suitable habitat types within the Study Area by a qualified biologist. Nest structures should be avoided by project activity; the typical avoidance distance required is between 2 and 5 feet.

If nest avoidance is infeasible, the nest structure should be dismantled by a qualified biologist. Nest material should be moved to suitable adjacent areas (e.g., woodland, scrub, or chaparral) that will not be disturbed. If young are encountered during the dismantling process, the material should be placed back on the nest and remain undisturbed for a minimum of two (2) weeks to give the young enough time to mature and leave on their own accord. After the young have left the nest, the nest dismantling process should begin again.

6.2.4 Nesting Birds

POTENTIAL PROJECT IMPACTS

Vegetation removal, including trimming, has the potential to directly impact nesting bird habitat. Project activities also have the potential to result in indirect impacts to native nesting birds through acoustic nuisance. Nesting birds have the potential to nest in trees, shrubs, and herbaceous vegetation, and on man-made structures within the Study Area. Most nesting birds in California are protected by the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code. As a result of these protections, the removal or disturbance of active nests (i.e., those containing eggs or young) is prohibited.

RECOMMENDED AVOIDANCE AND MINIMIZATION MEASURES

To avoid impacts to these birds in compliance with Fish and Game Code, tree removal should be conducted outside of the breeding bird season, generally defined as February 1–August 31, to the extent feasible. If construction is scheduled to commence between February 1 and August 31, pre-construction surveys for breeding birds should be conducted within 14 days prior to start of construction. If active bird nests are found during the pre-construction survey, avoidance buffers specific to the species in question and setting of the nest would be required as determined by a qualified biologist. The buffers would establish a "no-construction zone" which would remain in place until after young have fledged the nest or the nest otherwise becomes inactive. At a minimum, any active nests should be monitored periodically to determine when the nest has become inactive. Nesting bird surveys would generally be repeated during the nesting bird season if the project experiences work stoppages greater than 14 days, given that new nests may have been initiated in the absence of disturbance.

6.2.5 Trees

POTENTIAL PROJECT IMPACTS

Both native and non-native trees are present throughout the Study Area. Trees are concentrated in coast live oak woodland, buckeye groves, and riparian woodlands; however, scattered trees are also present in scrub, chaparral, and grassland habitats within the Study Area. The Tree

Ordinance requires approval for removal of individual trees with a trunk diameter of 12 inches or more at breast height, or 'groves', (i.e., trees within a grouping of five or more of the same species with a trunk diameter of 6 inches or more at breast height).

Under the Tree Ordinance, the clearing or removal of these trees for the construction of any improvement on lands, other than for subdivision or division of lands, shall be permitted, nor shall a building permit be issued without the site plan having first been approved by the city engineer or their authorized representative. If the project includes tree removal, approval must be gained by the city engineer prior to any removal activities.

RECOMMENDED AVOIDANCE AND MINIMIZATION MEASURES

Should any tree removal be proposed, a tree survey conducted by a certified arborist should be conducted within the area of proposed tree removal to determine which trees are protected by the Tree Ordinance. All applicable measures discussed in the Tree Ordinance, including obtaining approval from the city engineer, should be adopted.

7.0 CONCLUSIONS

The Study Area includes seven different sensitive land cover types that occupy approximately 13 acres of the 21-acre total area. These include ephemeral stream, needle grass grassland, coast live oak woodland, California buckeye groves, riparian California buckeye groves, riparian coast live oak woodland, and riparian California sagebrush scrub. Disturbance of any of these land cover types could be considered potentially significant under CEQA. Impacts to an ephemeral stream will require a permit from the Corps, CDFW, and RWQCB; and impacts to riparian habitat will require a permit from CDFW, and possibly the RWQCB. For activities with potential to impact portions of the Study Area that are located within riparian corridors, the CDFW and the RWQCB would require some degree of compensatory mitigation for riparian habitat impacts. Town setback policies prohibit work within 20 feet of ephemeral streams, and within riparian corridors, as well. Work within these setbacks would require permission from the Town.

Prior to any ground disturbance or vegetation removal, targeted native plant surveys should be conducted for the six special-status plant species with potential to occur within the Study Area (bent-flowered fiddleneck, Brewer's calandrinia, western leatherwood, California bottle-brush grass, San Mateo woolly sunflower, and San Francisco owl's clover) during their blooming periods, or when plants are readily identifiable. If one or more special-status plant species are encountered, additional mitigation measures may be required. If tree removal is proposed, a tree survey should also be conducted by an arborist to determine the presence of any protected trees. Hoary bat, San Francisco dusky-footed woodrat, and nesting birds have the potential to occur in the Study Area. The avoidance and minimization measures discussed above should guide future project plan development.

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Attachments

Attachment A. Figures

Figure 1. General Vicinity Map

Figure 2. Study Area Overview

Figure 3. Land Cover Types within Study Area

Figure 4. Potential Biological Constraints within the Study Area

Attachment B. Species Observed within and around the Study Area

Attachment C. Representative Site Photographs

Attachment D. Special-Status Plant and Wildlife Species Documented in the Vicinity of the Study Area

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Attachment A.

Figures

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Sources: National Geographic, WRA | Prepared By: njander, 2/2/2023

Figure 1. General Vicinity Map

Tobin Clark Property,
Town of Hillsborough,
San Mateo County, California

0 0.25 0.5 Miles

N

wra Environmental Consultants



Path: L:\Acad 2000 Files\29000\29273-5\GIS\ArcMap\29273-5Base.aprx Layout Name: Fig2_Aerial Photograph of the Study Area

Sources: San Mateo County Imagery 2022, WRA | Prepared By: njander, 2/17/2023

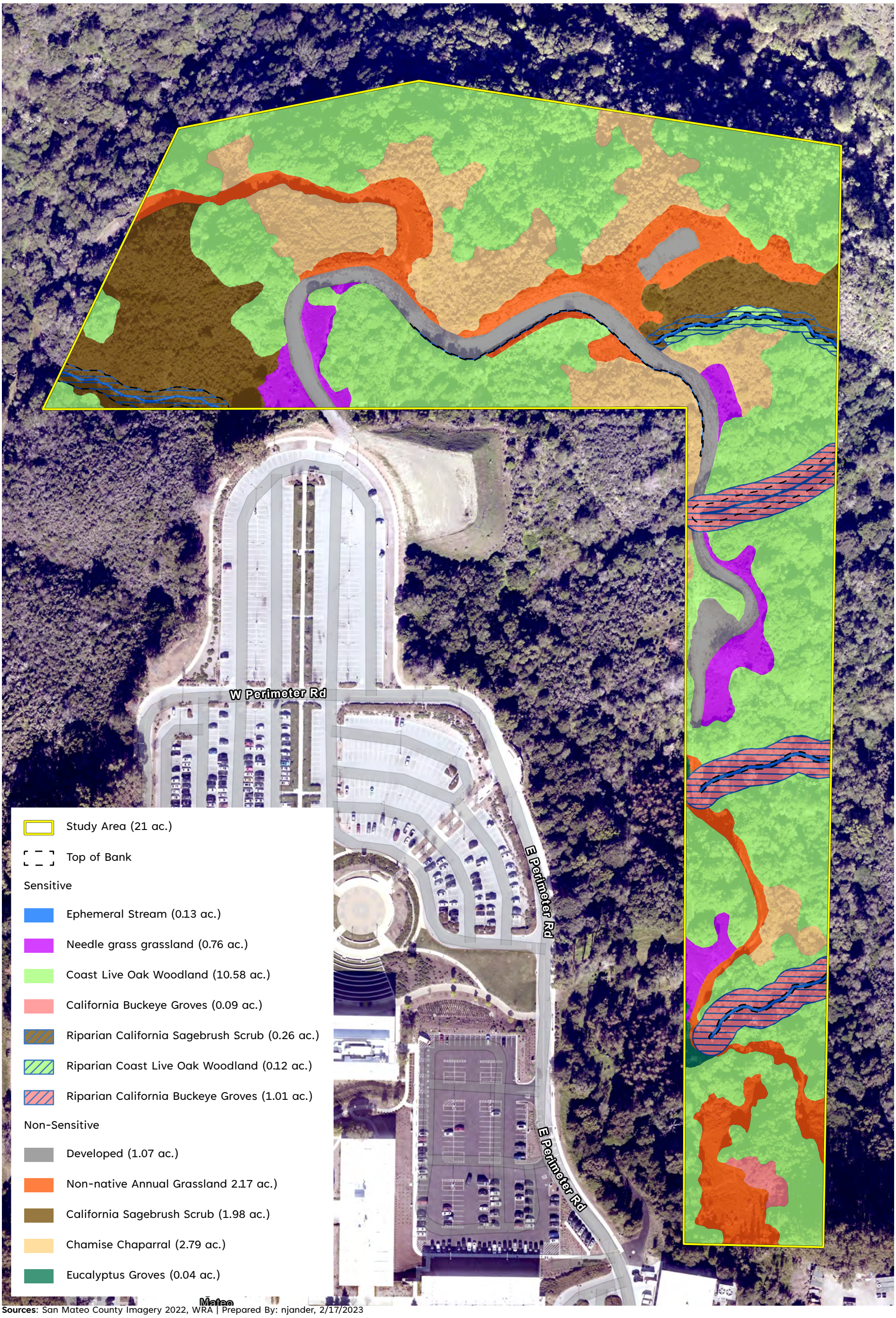
Figure 2. Study Area Overview

Tobin Clark Property,
Town of Hillsborough,
San Mateo County, California

0 250 500 Feet

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wra Environmental Consultants



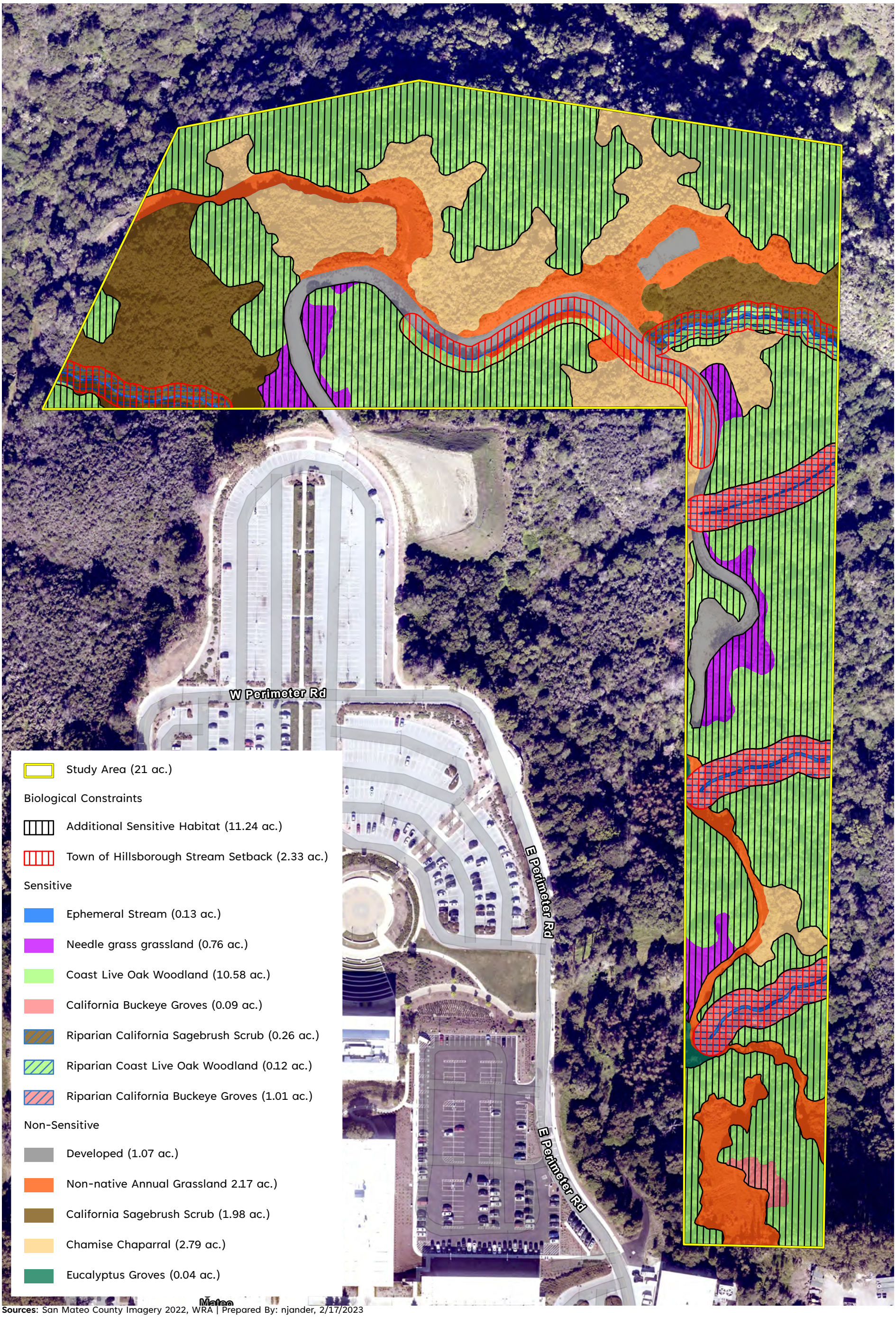
Sources: San Mateo County Imagery 2022, WRA | Prepared By: njander, 2/17/2023

Figure 3. Land Cover Types within the Study Area

Tobin Clark Property,
Town of Hillsborough,
San Mateo County, California

0 250 500 Feet

wra Environmental Consultants



Sources: San Mateo County Imagery 2022, WRA | Prepared By: njander, 2/17/2023

Figure 4. Biological Constraints within the Study Area

Tobin Clark Property,
Town of Hillsborough,
San Mateo County, California

0 250 500 Feet

wra Environmental Consultants

Attachment B.

Species Observed within and around the Study Area

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Attachment B-1. **Plant species observed within and around the Study Area on February 6, 2023**

SCIENTIFIC NAME	COMMON NAME	ORIGIN	FORM	RARITY STATUS[1]	CAL-IPC STATUS[2]	WETLAND STATUS[3]
Achillea millefolium	Yarrow	native	perennial herb	-	-	FACU
Adenostoma fasciculatum	Chamise	native	tree, shrub	-	-	-
Adiantum jordanii	California maidenhair fern	native	fern	-	-	FAC
Aesculus californica	Buckeye	native	tree	-	-	-
***Arctostaphylos* sp.**	Manzanita	native	shrub	-	-	-
Artemisia californica	Coastal sage brush	native	shrub	-	-	-
***Avena* sp.**	Oats	non-native (invasive)	Annual grass	-	Moderate	-
Baccharis pilularis	Coyote brush	native	shrub	-	-	-
Briza maxima	Rattlesnake grass	non-native (invasive)	annual grass	-	Limited	-
Bromus hordeaceus	Soft chess	non-native (invasive)	annual grass	-	Limited	FACU
***Cardamine* sp.**	Bittercress	-	-	-	-	-
Carduus pycnocephalus* ssp. *pycnocephalus	Italian thistle	non-native (invasive)	annual herb	-	Moderate	-
Carpobrotus edulis	Iceplant	non-native (invasive)	perennial herb	-	High	-
Ceanothus thyrsiflorus	Blueblossom	native	tree, shrub	-	-	-
Centaurea melitensis	Tocalote	non-native (invasive)	annual herb	-	Moderate	-
Chlorogalum pomeridianum	Amole	native	perennial herb	-	-	-
Cirsium vulgare	Bullthistle	non-native (invasive)	perennial herb	-	Moderate	FACU
Claytonia perfoliata	Miner's lettuce	native	annual herb	-	-	FAC
Cortaderia selloana	Pampas grass	non-native (invasive)	perennial grass	-	High	FACU
Delairea odorata	Cape ivy	non-native (invasive)	perennial herb	-	High	FAC
Diplacus aurantiacus	Sticky monkeyflower	native	shrub	-	-	FACU
Dittrichia graveolens	Stinkwort	non-native (invasive)	annual herb	-	Moderate	-
Elymus triticoides	Beardless wild rye	native	perennial grass	-	-	FAC
Erigeron canadensis	Horseweed	native	annual herb	-	-	FACU
Erodium botrys	Big heron bill	non-native	annual herb	-	-	FACU
Erodium brachycarpum	White stemmed filaree	non-native	annual herb	-	-	-

SCIENTIFIC NAME	COMMON NAME	ORIGIN	FORM	RARITY STATUS[1]	CAL-IPC STATUS[2]	WETLAND STATUS[3]
Erodium cicutarium	Red stemmed filaree	non-native (invasive)	annual herb	-	Limited	-
Eucalyptus globulus	Blue gum	non-native (invasive)	tree	-	Limited	-
Festuca perennis	Italian rye grass	non-native (invasive)	annual, perennial grass	-	Moderate	FAC
Galium aparine	Cleavers	native	annual herb	-	-	FACU
Genista monspessulana	French broom	non-native (invasive)	shrub	-	High	-
Helminthotheca echioides	Bristly ox-tongue	non-native (invasive)	annual, perennial herb	-	Limited	FAC
Heteromeles arbutifolia	Toyon	native	shrub	-	-	-
Hirschfeldia incana	Short-podded mustard	non-native (invasive)	perennial herb	-	Moderate	-
Hordeum marinum* ssp. *gussoneanum	Mediterranean barley	non-native (invasive)	annual grass	-	Moderate	FAC
Juncus patens	Common rush	native	perennial grass-like herb	-	-	FACW
***Lomatium* sp.**	Lomatium	-	-	-	-	-
Lonicera hispidula	Pink honeysuckle	native	vine, shrub	-	-	FACU
Lupinus bicolor	Miniature lupine	native	annual, perennial herb	-	-	-
Marah fabacea	California man-root	native	perennial herb, vine	-	-	-
Medicago polymorpha	Bur clover	non-native (invasive)	annual herb	-	Limited	FACU
Mentha pulegium	Pennyroyal	non-native (invasive)	perennial herb	-	Moderate	OBL
Oxalis pes-caprae	Bermuda buttercup	non-native (invasive)	perennial herb	-	Moderate	-
Pedicularis densiflora	Indian warrior	native	perennial herb	-	-	-
Pentagramma triangularis	Gold back fern	native	fern	-	-	-
***Pinus* sp.**	Pine	non-native	tree	-	-	-
Plantago coronopus	Cut leaf plantain	non-native	annual herb	-	-	FAC
Plantago lanceolata	Ribwort	non-native (invasive)	perennial herb	-	Limited	FAC
Pteridium aquilinum* var. *pubescens	Western bracken fern	native	fern	-	-	FACU
Quercus agrifolia	Coast live oak	native	tree	-	-	-
***Ribes* sp.**	Gooseberry	native	shrub	-	-	-
Sambucus mexicana	Blue elderberry	native	shrub	-	-	FACU

SCIENTIFIC NAME	COMMON NAME	ORIGIN	FORM	RARITY STATUS[1]	CAL-IPC STATUS[2]	WETLAND STATUS[3]
Sanicula bipinnatifida	Purple sanicle	native	perennial herb	-	-	-
Scrophularia californica	California bee plant	native	perennial herb	-	-	FAC
Silybum marianum	Milk thistle	non-native (invasive)	annual, perennial herb	-	Limited	-
Stipa pulchra	Purple needle grass	native	perennial grass	-	-	-
Toxicodendron diversilobum	Poison oak	native	vine, shrub	-	-	FACU
***Trifolium* sp.**	clover	native	-	-	-	-
Umbellularia californica	California bay	native	tree	-	-	FAC
Vicia sativa	Spring vetch	non-native	annual herb, vine	-	-	FACU
Vicia villosa	Hairy vetch	non-native	annual herb, vine	-	-	-

All species identified using the *Jepson Flora Project* (Jepson eFlora 2023); nomenclature follows Jepson eFlora. Sp.: "species," intended to indicate that the observer was confident in the identity of the genus but uncertain which species.

[1]Rare Status: The CNPS Inventory of Rare and Endangered Plants (CNPS 2023a)

FE: Federal Endangered
FT: Federal Threatened
SE: State Endangered
ST: State Threatened
SR: State Rare
Rank 1A: Plants presumed extirpated in California and either rare or extinct elsewhere
Rank 1B: Plants rare, threatened, or endangered in California and elsewhere
Rank 2A: Plants presumed extirpated in California, but more common elsewhere
Rank 2B: Plants rare, threatened, or endangered in California, but more common elsewhere
Rank 3: Plants about which we need more information – a review list
Rank 4: Plants of limited distribution – a watch list

[2]Invasive Status: California Invasive Plant Inventory (Cal-IPC 2023)

High: Severe ecological impacts; high rates of dispersal and establishment; most are widely distributed ecologically.
Moderate: Substantial and apparent ecological impacts; moderate-high rates of dispersal, establishment dependent on disturbance; limited-moderate distribution ecologically
Limited: Minor or not well documented ecological impacts; low-moderate rate of invasiveness; limited distribution ecologically
Assessed: Assessed by Cal-IPC and determined to not be an existing current threat

[3]Wetland Status: National List of Plant Species that Occur in Wetlands, Arid West Region (Corps 2018)

OBL: Almost always a hydrophyte, rarely in uplands

SCIENTIFIC NAME	COMMON NAME	ORIGIN	FORM	RARITY STATUS[1]	CAL-IPC STATUS[2]	WETLAND STATUS[3]
FACW: Usually a hydrophyte, but occasionally found in uplands **FAC:** Commonly either a hydrophyte or non-hydrophyte **FACU:** Occasionally a hydrophyte, but usually found in uplands **UPL:** Rarely a hydrophyte, almost always in uplands **NL:** Rarely a hydrophyte, almost always in uplands **NI:** No information; not factored during wetland delineation						

Attachment B-2. Wildlife species observed within and around the Project Area on February 6, 2023

SCIENTIFIC NAME	COMMON NAME	STATUS
BIRDS		
Calypte anna	Anna's hummingbird	--
Corvus brachyrhynchos	American crow	--
Mimus polyglottos	northern mockingbird	--
Aphelocoma californica	California scrub-jay	--
Columba livia	rock dove	--
Melospiza melodia	song sparrow	--
Buteo jamaicensis	red-tailed hawk	--
Cathartes aura	turkey vulture	--
Poecile rufescens	chestnut-backed chickadee	--
Colaptes auratus	northern flicker	--
Psaltriparus minimus	bushtit	--
Junco hyemalis	dark-eyed junco	--
Turdus migratorius	American robin	--
MAMMALS		
Sylvilagus audubonii	desert cottontail	--
Lepus californicus	black-tailed jackrabbit	--
Odocoileus hemionus	mule deer (scat)	--
INVERTEBRATES		
Ariolimax californicus	banana slug	--

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Attachment C

Representative Site Photographs

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Photo 1. View of the paved unnamed trail, facing west from the access point of the Study Area. *Photo taken on February 6, 2023.*



Photo 2. View of California sagebrush scrub within the western corner of the Study Area, near the westernmost ephemeral stream. *Photo taken on February 6, 2023.*



Photo 3. View of an ephemeral stream and riparian California sagebrush scrub within the Study Area. Water was flowing within this feature during the time of the site visit. *Photo taken on February 6, 2023.*



Photo 4. Representative view of a purple needlegrass grassland within the Study Area. This landcover type occurs at various points along the unnamed, paved trail. *Photo taken on February 6, 2023.*



Photo 5. View of non-native annual grassland in the northwestern corner of the Study Area. *Photo taken on February 6, 2023.*



Photo 6. View of the ephemeral stream paralleling the fire road for a large portion of the Study Area. The feature contained following water at the time of the site visit. *Photo taken on February 6, 2023.*



Photo 7. View of ephemeral stream and associated riparian California buckeye groves in the eastern portion of the Study Area. *Photo taken on February 6, 2023.*



Photo 8. View of eucalyptus groves land cover type that cover areas along the southern boundary of the Study Area. *Photo taken on February 6, 2023.*



Photo 9. View of California buckeye groves on the eastern edge of the Study Area.
Photo taken on February 6, 2023.

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Attachment D

Special-Status Plant and Wildlife Species Documented in the Vicinity of the Study Area

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Attachment D. Special-status plant and wildlife species documented in the vicinity of the Project Area.

List compiled from a search of the California Department of Fish and Wildlife Natural Diversity Database (CDFW 2023), the U.S. Fish and Wildlife Service Information Planning and Consultation database (USFWS 2023), and the California Native Plant Society Inventory of Rare and Endangered Plants (CNPS 2023a), for the San Mateo, San Francisco South, Hunters Point, San Leandro, Redwood Point, Palo Alto, Montara Mountain, Woodside, and Half Moon Bay U.S. Geological Survey (USGS) 7.5-minute quadrangles.

SPECIES	STATUS*	HABITAT
	PLANTS	
San Mateo thorn-mint ***Acanthomintha duttonii***	FE, SE, Rank 1B.1	Chaparral, valley and foothill grassland. Elevation ranges from 165 to 985 feet (50 to 300 meters). Blooms Apr–Jun.
Blasdale's bent grass ***Agrostis blasdalei***	Rank 1B.2	Coastal bluff scrub, coastal dunes, coastal prairie. Elevation ranges from 0 to 490 feet (0 to 150 meters). Blooms May–Jul.
Franciscan onion ***Allium peninsulare* var. *franciscanum***	Rank 1B.2	Cismontane woodland, valley and foothill grassland. Elevation ranges from 170 to 1000 feet (52 to 305 meters). Blooms (Apr)May–Jun.
bent-flowered fiddleneck ***Amsinckia lunaris***	Rank 1B.2	Cismontane woodland, coastal bluff scrub, valley, and foothill grassland. Elevation ranges from 10 to 1640 feet (3 to 500 meters). Blooms Mar–Jun.
California androsace ***Androsace elongata* ssp. *acuta***	Rank 4.2	Chaparral, cismontane woodland, coastal scrub, meadows and seeps, pinyon and juniper woodland, valley, and foothill grassland. Elevation ranges from 490 to 4280 feet (150 to 1305 meters). Blooms Mar–Jun.
coast rockcress ***Arabis blepharophylla***	Rank 4.3	Broadleafed upland forest, coastal bluff scrub, coastal prairie, coastal scrub. Elevation ranges from 10 to 3610 feet (3 to 1100 meters). Blooms Feb–May.
Anderson's manzanita ***Arctostaphylos andersonii***	Rank 1B.2	Broadleafed upland forest, chaparral, north coast coniferous forest. Elevation ranges from 195 to 2495 feet (60 to 760 meters). Blooms Nov–May.
Franciscan manzanita ***Arctostaphylos franciscana***	FE, Rank 1B.1	Coastal scrub (serpentine). Elevation ranges from 195 to 985 feet (60 to 300 meters). Blooms Feb–Apr.
San Bruno Mountain manzanita ***Arctostaphylos imbricata***	SE, Rank 1B.1	Chaparral, coastal scrub. Elevation ranges from 900 to 1215 feet (275 to 370 meters). Blooms Feb–May.
Presidio manzanita ***Arctostaphylos montana* ssp. *ravenii***	FE, SE, Rank 1B.1	Chaparral, coastal prairie, coastal scrub. Elevation ranges from 150 to 705 feet (45 to 215 meters). Blooms Feb–Mar.
Montara manzanita ***Arctostaphylos montaraensis***	Rank 1B.2	Chaparral (maritime), coastal scrub. Elevation ranges from 260 to 1640 feet (80 to 500 meters). Blooms Jan–Mar.
Pacific manzanita ***Arctostaphylos pacifica***	SE, Rank 1B.1	Chaparral, coastal scrub. Elevation ranges from 1085 to 1085 feet (330 to 330 meters). Blooms Feb–Apr.
Kings Mountain manzanita ***Arctostaphylos regismontana***	Rank 1B.2	Broadleafed upland forest, chaparral, north coast coniferous forest. Elevation ranges from 1000 to 2395 feet (305 to 730 meters). Blooms Dec–Apr.
ocean bluff milk-vetch ***Astragalus nuttallii* var. *nuttallii***	Rank 4.2	Coastal bluff scrub, coastal dunes. Elevation ranges from 10 to 395 feet (3 to 120 meters). Blooms Jan–Nov.

SPECIES	STATUS*	HABITAT
coastal marsh milk-vetch ***Astragalus pycnostachyus* var. *pycnostachyus***	Rank 1B.2	Coastal dunes (mesic), coastal scrub, marshes and swamps (coastal salt, streamsides). Elevation ranges from 0 to 180 feet (0 to 55 meters). Blooms (Apr)Jun–Oct.
alkali milk-vetch ***Astragalus tener* var. *tener***	Rank 1B.2	Playas, valley and foothill grassland (adobe clay), vernal pools. Elevation ranges from 5 to 195 feet (1 to 60 meters). Blooms Mar–Jun.
Brewer's calandrinia ***Calandrinia breweri***	Rank 4.2	Chaparral, coastal scrub. Elevation ranges from 35 to 4005 feet (10 to 1220 meters). Blooms (Jan)Mar–Jun.
Oakland star-tulip ***Calochortus umbellatus***	Rank 4.2	Broadleafed upland forest, chaparral, cismontane woodland, lower montane coniferous forest, valley, and foothill grassland. Elevation ranges from 330 to 2295 feet (100 to 700 meters). Blooms Mar–May.
pink star-tulip ***Calochortus uniflorus***	Rank 4.2	Coastal prairie, coastal scrub, meadows and seeps, north coast coniferous forest. Elevation ranges from 35 to 3510 feet (10 to 1070 meters). Blooms Apr–Jun.
bristly sedge ***Carex comosa***	Rank 2B.1	Coastal prairie, marshes and swamps (lake margins), valley and foothill grassland. Elevation ranges from 0 to 2050 feet (0 to 625 meters). Blooms May–Sep.
johnny-nip ***Castilleja ambigua* var. *ambigua***	Rank 4.2	Coastal bluff scrub, coastal prairie, coastal scrub, marshes and swamps, valley and foothill grassland, vernal pools (margins). Elevation ranges from 0 to 1425 feet (0 to 435 meters). Blooms Mar–Aug.
Congdon's tarplant ***Centromadia parryi* ssp. *congdonii***	Rank 1B.1	Valley and foothill grassland (alkaline). Elevation ranges from 0 to 755 feet (0 to 230 meters). Blooms May–Oct(Nov).
pappose tarplant ***Centromadia parryi* ssp. *parryi***	Rank 1B.2	Chaparral, coastal prairie, marshes and swamps (coastal salt), meadows and seeps, valley and foothill grassland (vernally mesic). Elevation ranges from 0 to 1380 feet (0 to 420 meters). Blooms May–Nov.
Point Reyes salty bird's-beak ***Chloropyron maritimum* ssp. *palustre***	Rank 1B.2	Marshes and swamps (coastal salt). Elevation ranges from 0 to 35 feet (0 to 10 meters). Blooms Jun–Oct.
San Francisco Bay spineflower ***Chorizanthe cuspidata* var. *cuspidata***	Rank 1B.2	Coastal bluff scrub, coastal dunes, coastal prairie, coastal scrub. Elevation ranges from 10 to 705 feet (3 to 215 meters). Blooms Apr–Jul(Aug).
robust spineflower ***Chorizanthe robusta* var. *robusta***	FE, Rank 1B.1	Chaparral (maritime), cismontane woodland (openings), coastal dunes, coastal scrub. Elevation ranges from 10 to 985 feet (3 to 300 meters). Blooms Apr–Sep.
Franciscan thistle ***Cirsium andrewsii***	Rank 1B.2	Broadleafed upland forest, coastal bluff scrub, coastal prairie, coastal scrub. Elevation ranges from 0 to 490 feet (0 to 150 meters). Blooms Mar–Jul.
fountain thistle ***Cirsium fontinale* var. *fontinale***	FE, SE, Rank 1B.1	Chaparral (openings), cismontane woodland, meadows and seeps, valley and foothill grassland. Elevation ranges from 150 to 575 feet (45 to 175 meters). Blooms (Apr)May–Oct.
compact cobwebby thistle ***Cirsium occidentale* var. *compactum***	Rank 1B.2	Chaparral, coastal dunes, coastal prairie, coastal scrub. Elevation ranges from 15 to 490 feet (5 to 150 meters). Blooms Apr–Jun.

SPECIES	STATUS*	HABITAT
lost thistle ***Cirsium praeteriens***	Rank 1A	Known from only two records in California. Thought to be extirpated. Blooms Jun-Jul.
round-headed collinsia ***Collinsia corymbosa***	Rank 1B.2	Coastal dunes. Elevation ranges from 0 to 65 feet (0 to 20 meters). Blooms Apr–Jun.
San Francisco collinsia ***Collinsia multicolor***	Rank 1B.2	Closed-cone coniferous forest, coastal scrub. Elevation ranges from 100 to 900 feet (30 to 275 meters). Blooms (Feb)Mar–May.
clustered lady's-slipper ***Cypripedium fasciculatum***	Rank 4.2	Lower montane coniferous forest, north coast coniferous forest. Elevation ranges from 330 to 7990 feet (100 to 2435 meters). Blooms Mar–Aug.
western leatherwood ***Dirca occidentalis***	Rank 1B.2	Broadleafed upland forest, chaparral, cismontane woodland, closed-cone coniferous forest, north coast coniferous forest, riparian forest, riparian woodland. Elevation ranges from 80 to 1395 feet (25 to 425 meters). Blooms Jan–Mar(Apr).
California bottle-brush grass ***Elymus californicus***	Rank 4.3	Broadleafed upland forest, cismontane woodland, north coast coniferous forest, riparian woodland. Elevation ranges from 50 to 1540 feet (15 to 470 meters). Blooms May–Aug(Nov).
San Mateo woolly sunflower ***Eriophyllum latilobum***	FE, SE, Rank 1B.1	Cismontane woodland (often serpentine, roadcuts), coastal scrub, lower montane coniferous forest. Elevation ranges from 150 to 1085 feet (45 to 330 meters). Blooms May–Jun.
Hoover's button-celery ***Eryngium aristulatum* var. *hooveri***	Rank 1B.1	Vernal pools. Elevation ranges from 10 to 150 feet (3 to 45 meters). Blooms (Jun)Jul(Aug).
Jepson's coyote-thistle ***Eryngium jepsonii***	Rank 1B.2	Valley and foothill grassland, vernal pools. Elevation ranges from 10 to 985 feet (3 to 300 meters). Blooms Apr–Aug.
San Francisco wallflower ***Erysimum franciscanum***	Rank 4.2	Chaparral, coastal dunes, coastal scrub, valley and foothill grassland. Elevation ranges from 0 to 1805 feet (0 to 550 meters). Blooms Mar–Jun.
Hillsborough chocolate lily ***Fritillaria biflora* var. *ineziana***	Rank 1B.1	Cismontane woodland, valley and foothill grassland. Elevation ranges from 490 to 490 feet (150 to 150 meters). Blooms Mar–Apr.
Marin checker lily ***Fritillaria lanceolata* var. *tristulis***	Rank 1B.1	Coastal bluff scrub, coastal prairie, coastal scrub. Elevation ranges from 50 to 490 feet (15 to 150 meters). Blooms Feb–May.
fragrant fritillary ***Fritillaria liliacea***	Rank 1B.2	Cismontane woodland, coastal prairie, coastal scrub, valley and foothill grassland. Elevation ranges from 10 to 1345 feet (3 to 410 meters). Blooms Feb–Apr.
blue coast gilia ***Gilia capitata* ssp. *chamissonis***	Rank 1B.1	Coastal dunes, coastal scrub. Elevation ranges from 5 to 655 feet (2 to 200 meters). Blooms Apr–Jul.
dark-eyed gilia ***Gilia millefoliata***	Rank 1B.2	Coastal dunes. Elevation ranges from 5 to 100 feet (2 to 30 meters). Blooms Apr–Jul.
San Francisco gumplant ***Grindelia hirsutula* var. *maritima***	Rank 3.2	Coastal bluff scrub, coastal scrub, valley and foothill grassland. Elevation ranges from 50 to 1310 feet (15 to 400 meters). Blooms Jun–Sep.

SPECIES	STATUS*	HABITAT
Diablo helianthella ***Helianthella castanea***	Rank 1B.2	Broadleafed upland forest, chaparral, cismontane woodland, coastal scrub, riparian woodland, valley and foothill grassland. Elevation ranges from 195 to 4265 feet (60 to 1300 meters). Blooms Mar–Jun.
congested-headed hayfield tarplant ***Hemizonia congesta* ssp. *congesta***	Rank 1B.2	Valley and foothill grassland. Elevation ranges from 65 to 1835 feet (20 to 560 meters). Blooms Apr–Nov.
short-leaved evax ***Hesperevax sparsiflora* var. *brevifolia***	Rank 1B.2	Coastal bluff scrub (sandy), coastal dunes, coastal prairie. Elevation ranges from 0 to 705 feet (0 to 215 meters). Blooms Mar–Jun.
Marin western flax ***Hesperolinon congestum***	FT, ST, Rank 1B.1	Chaparral, valley and foothill grassland. Elevation ranges from 15 to 1215 feet (5 to 370 meters). Blooms Apr–Jul.
water star-grass ***Heteranthera dubia***	Rank 2B.2	Marshes and swamps (alkaline, still, slow-moving water). Elevation ranges from 100 to 4905 feet (30 to 1495 meters). Blooms Jul–Oct.
Loma Prieta hoita ***Hoita strobilina***	Rank 1B.1	Chaparral, cismontane woodland, riparian woodland. Elevation ranges from 100 to 2820 feet (30 to 860 meters). Blooms May–Jul(Aug–Oct).
Kellogg's horkelia ***Horkelia cuneata* var. *sericea***	Rank 1B.1	Chaparral (maritime), closed-cone coniferous forest, coastal dunes, coastal scrub. Elevation ranges from 35 to 655 feet (10 to 200 meters). Blooms Apr–Sep.
Point Reyes horkelia ***Horkelia marinensis***	Rank 1B.2	Coastal dunes, coastal prairie, coastal scrub. Elevation ranges from 15 to 2475 feet (5 to 755 meters). Blooms May–Sep.
harlequin lotus ***Hosackia gracilis***	Rank 4.2	Broadleafed upland forest, cismontane woodland, closed-cone coniferous forest, coastal bluff scrub, coastal prairie, coastal scrub, marshes and swamps, meadows and seeps, north coast coniferous forest, valley and foothill grassland. Elevation ranges from 0 to 2295 feet (0 to 700 meters). Blooms Mar–Jul.
island tube lichen ***Hypogymnia schizidiata***	Rank 1B.3	Chaparral, closed-cone coniferous forest. Elevation ranges from 1180 to 1330 feet (360 to 405 meters).
coast iris ***Iris longipetala***	Rank 4.2	Coastal prairie, lower montane coniferous forest, meadows and seeps. Elevation ranges from 0 to 1970 feet (0 to 600 meters). Blooms Mar–May(Jun).
perennial goldfields ***Lasthenia californica* ssp. *macrantha***	Rank 1B.2	Coastal bluff scrub, coastal dunes, coastal scrub. Elevation ranges from 15 to 1705 feet (5 to 520 meters). Blooms Jan–Nov.
Contra Costa goldfields ***Lasthenia conjugens***	FE, Rank 1B.1	Cismontane woodland, playas (alkaline), valley and foothill grassland, vernal pools. Elevation ranges from 0 to 1540 feet (0 to 470 meters). Blooms Mar–Jun.
beach layia ***Layia carnosa***	FT, SE, Rank 1B.1	Coastal dunes, coastal scrub (sandy). Elevation ranges from 0 to 195 feet (0 to 60 meters). Blooms Mar–Jul.
serpentine leptosiphon ***Leptosiphon ambiguus***	Rank 4.2	Cismontane woodland, coastal scrub, valley and foothill grassland. Elevation ranges from 395 to 3710 feet (120 to 1130 meters). Blooms Mar–Jun.
bristly leptosiphon ***Leptosiphon aureus***	Rank 4.2	Chaparral, cismontane woodland, coastal prairie, valley and foothill grassland. Elevation ranges from 180 to 4920 feet (55 to 1500 meters). Blooms Apr–Jul.

SPECIES	STATUS*	HABITAT
coast yellow leptosiphon ***Leptosiphon croceus***	SE, Rank 1B.1	Coastal bluff scrub, coastal prairie. Elevation ranges from 35 to 490 feet (10 to 150 meters). Blooms Apr–Jun.
large-flowered leptosiphon ***Leptosiphon grandiflorus***	Rank 4.2	Cismontane woodland, closed-cone coniferous forest, coastal bluff scrub, coastal dunes, coastal prairie, coastal scrub, valley and foothill grassland. Elevation ranges from 15 to 4005 feet (5 to 1220 meters). Blooms Apr–Aug.
broad-lobed leptosiphon ***Leptosiphon latisectus***	Rank 4.3	Broadleafed upland forest, cismontane woodland. Elevation ranges from 560 to 4920 feet (170 to 1500 meters). Blooms Apr–Jun.
rose leptosiphon ***Leptosiphon rosaceus***	Rank 1B.1	Coastal bluff scrub. Elevation ranges from 0 to 330 feet (0 to 100 meters). Blooms Apr–Jul.
Crystal Springs lessingia ***Lessingia arachnoidea***	Rank 1B.2	Cismontane woodland, coastal scrub, valley and foothill grassland. Elevation ranges from 195 to 655 feet (60 to 200 meters). Blooms Jul–Oct.
San Francisco lessingia ***Lessingia germanorum***	FE, SE, Rank 1B.1	Coastal scrub (remnant dunes). Elevation ranges from 80 to 360 feet (25 to 110 meters). Blooms (Jun)Jul–Nov.
woolly-headed lessingia ***Lessingia hololeuca***	Rank 3	Broadleafed upland forest, coastal scrub, lower montane coniferous forest, valley and foothill grassland. Elevation ranges from 50 to 1000 feet (15 to 305 meters). Blooms Jun–Oct.
spring lessingia ***Lessingia tenuis***	Rank 4.3	Chaparral, cismontane woodland, lower montane coniferous forest. Elevation ranges from 985 to 7055 feet (300 to 2150 meters). Blooms May–Jul.
Ornduff's meadowfoam ***Limnanthes douglasii* ssp. *ornduffii***	Rank 1B.1	Meadows and seeps. Elevation ranges from 35 to 65 feet (10 to 20 meters). Blooms Nov–May.
San Mateo tree lupine ***Lupinus arboreus* var. *eximius***	Rank 3.2	Chaparral, coastal scrub. Elevation ranges from 295 to 1805 feet (90 to 550 meters). Blooms Apr–Jul.
arcuate bush-mallow ***Malacothamnus arcuatus***	Rank 1B.2	Chaparral, cismontane woodland. Elevation ranges from 50 to 1165 feet (15 to 355 meters). Blooms Apr–Sep.
northern curly-leaved monardella ***Monardella sinuata* ssp. *nigrescens***	Rank 1B.2	Chaparral (scr co.), coastal dunes, coastal scrub, lower montane coniferous forest (scr co., ponderosa pine sandhills). Elevation ranges from 0 to 985 feet (0 to 300 meters). Blooms (Apr)May–Jul(Aug–Sep).
woodland woollythreads ***Monolopia gracilens***	Rank 1B.2	Broadleafed upland forest (openings), chaparral (openings), cismontane woodland, north coast coniferous forest (openings), valley and foothill grassland. Elevation ranges from 330 to 3935 feet (100 to 1200 meters). Blooms (Feb)Mar–Jul.
white-rayed pentachaeta ***Pentachaeta bellidiflora***	FE, SE, Rank 1B.1	Cismontane woodland, valley and foothill grassland (often serpentine). Elevation ranges from 115 to 2035 feet (35 to 620 meters). Blooms Mar–May.
Michael's rein orchid ***Piperia michaelii***	Rank 4.2	Chaparral, cismontane woodland, closed-cone coniferous forest, coastal bluff scrub, coastal scrub, lower montane coniferous forest. Elevation ranges from 10 to 3000 feet (3 to 915 meters). Blooms Apr–Aug.

SPECIES	STATUS*	HABITAT
Choris' popcornflower ***Plagiobothrys chorisianus* var. *chorisianus***	Rank 1B.2	Chaparral, coastal prairie, coastal scrub. Elevation ranges from 10 to 525 feet (3 to 160 meters). Blooms Mar–Jun.
Hickman's popcornflower ***Plagiobothrys chorisianus* var. *hickmanii***	Rank 4.2	Chaparral, closed-cone coniferous forest, coastal scrub, marshes and swamps, vernal pools. Elevation ranges from 50 to 1280 feet (15 to 390 meters). Blooms Apr–Jun.
Oregon polemonium ***Polemonium carneum***	Rank 2B.2	Coastal prairie, coastal scrub, lower montane coniferous forest. Elevation ranges from 0 to 6005 feet (0 to 1830 meters). Blooms Apr–Sep.
Marin knotweed ***Polygonum marinense***	Rank 3.1	Marshes and swamps (brackish, coastal salt). Elevation ranges from 0 to 35 feet (0 to 10 meters). Blooms (Apr)May–Aug(Oct).
Hickman's cinquefoil ***Potentilla hickmanii***	FE, SE, Rank 1B.1	Closed-cone coniferous forest, coastal bluff scrub, marshes and swamps (freshwater), meadows and seeps (vernally mesic). Elevation ranges from 35 to 490 feet (10 to 149 meters). Blooms Apr–Aug.
Lobb's aquatic buttercup ***Ranunculus lobbii***	Rank 4.2	Cismontane woodland, north coast coniferous forest, valley and foothill grassland, vernal pools. Elevation ranges from 50 to 1540 feet (15 to 470 meters). Blooms Feb–May.
Sanford's arrowhead ***Sagittaria sanfordii***	Rank 1B.2	Marshes and swamps (shallow freshwater). Elevation ranges from 0 to 2135 feet (0 to 650 meters). Blooms May–Oct(Nov).
adobe sanicle ***Sanicula maritima***	SR, Rank 1B.1	Chaparral, coastal prairie, meadows and seeps, valley and foothill grassland. Elevation ranges from 100 to 785 feet (30 to 240 meters). Blooms Feb–May.
chaparral ragwort ***Senecio aphanactis***	Rank 2B.2	Chaparral, cismontane woodland, coastal scrub. Elevation ranges from 50 to 2625 feet (15 to 800 meters). Blooms Jan–Apr(May).
Scouler's catchfly ***Silene scouleri* ssp. *scouleri***	Rank 2B.2	Coastal bluff scrub, coastal prairie, valley and foothill grassland. Elevation ranges from 0 to 1970 feet (0 to 600 meters). Blooms (Mar–May)Jun–Aug(Sep).
San Francisco campion ***Silene verecunda* ssp. *verecunda***	Rank 1B.2	Chaparral, coastal bluff scrub, coastal prairie, coastal scrub, valley and foothill grassland. Elevation ranges from 100 to 2115 feet (30 to 645 meters). Blooms (Feb)Mar–Jul(Aug).
long-styled sand-spurrey ***Spergularia macrotheca* var. *longistyla***	Rank 1B.2	Marshes and swamps, meadows and seeps. Elevation ranges from 0 to 835 feet (0 to 255 meters). Blooms Feb–May.
most beautiful jewelflower ***Streptanthus albidus* ssp. *peramoenus***	Rank 1B.2	Chaparral, cismontane woodland, valley and foothill grassland. Elevation ranges from 310 to 3280 feet (95 to 1000 meters). Blooms (Mar)Apr–Sep(Oct).
northern slender pondweed ***Stuckenia filiformis ssp. alpina***	Rank 2B.2	Marshes and swamps (shallow freshwater). Elevation ranges from 985 to 7055 feet (300 to 2150 meters). Blooms May–Jul.
California seablite ***Suaeda californica***	FE, Rank 1B.1	Marshes and swamps (coastal salt). Elevation ranges from 0 to 50 feet (0 to 15 meters). Blooms Jul–Oct.

SPECIES	STATUS*	HABITAT
two-fork clover ***Trifolium amoenum***	FE, Rank 1B.1	Coastal bluff scrub, valley and foothill grassland (sometimes serpentine). Elevation ranges from 15 to 1360 feet (5 to 415 meters). Blooms Apr–Jun.
saline clover ***Trifolium hydrophilum***	Rank 1B.2	Marshes and swamps, valley and foothill grassland (mesic, alkaline), vernal pools. Elevation ranges from 0 to 985 feet (0 to 300 meters). Blooms Apr–Jun.
San Francisco owl's-clover ***Triphysaria floribunda***	Rank 1B.2	Coastal prairie, coastal scrub, valley and foothill grassland. Elevation ranges from 35 to 525 feet (10 to 160 meters). Blooms Apr–Jun.
coastal triquetrella ***Triquetrella californica***	Rank 1B.2	Coastal bluff scrub, coastal scrub. Elevation ranges from 35 to 330 feet (10 to 100 meters).
WILDLIFE		
MAMMALS		
pallid bat ***Antrozous pallidus***	SSC, WBWG High	Found in a variety of habitats ranging from grasslands to mixed forests, favoring open and dry, rocky areas. Roost sites include crevices in rock outcrops and cliffs, caves, mines, and hollow trees and various manmade structures such as bridges, barns, and buildings (including occupied buildings). Roosts must protect bats from high temperatures. Very sensitive to disturbance of roosting sites.
Townsend's big-eared bat ***Corynorhinus townsendii***	SSC, WBWG High	Associated with a wide variety of habitats from deserts to higher elevation mixed and coniferous forests. Females form maternity colonies in buildings, caves and mines, and males roost singly or in small groups. Foraging typically occurs at edge habitats near wooded areas, e.g., along streams.
Steller (=Northern) sea lion ***Eumetopias jubatus***	FD, MMC SSC	Breeds on Año Nuevo, San Miguel and Farallon islands, Point Saint George, and Sugarloaf. Hauls-out on islands and rocks. Needs haul-out and breeding sites with unrestricted access to water, near aquatic food supply and with no human disturbance.
hoary bat ***Lasiurus cinereus***	WBWG Medium	Prefers open forested habitats or habitat mosaics, with access to trees for cover and open areas or habitat edges for feeding. Roosts in dense foliage of medium to large trees. Feeds primarily on moths.
fringed myotis ***Myotis thysanodes***	WBWG High	Associated with a wide variety of habitats including dry woodlands, desert scrub, mesic coniferous forest, grassland, and sage-grass steppes. Buildings, mines and large trees and snags are important day and night roosts.
San Francisco dusky-footed woodrat ***Neotoma fuscipes annectens***	SSC	Forest habitats of moderate canopy and moderate to dense understory, also in chaparral habitats. Constructs nests of shredded grass, leaves, and other material. May be limited by availability of nest-building materials.
big free-tailed bat ***Nyctinomops macrotis***	SSC, WBWG med-high	Occurs rarely in low-lying arid areas. Requires high cliffs or rocky outcrops for roosting sites.

SPECIES	STATUS*	HABITAT
salt-marsh harvest mouse ***Reithrodontomys raviventris***	FE, SE, CFP	Endemic to emergent salt and brackish wetlands of the San Francisco Bay Estuary. Pickleweed marshes are primary habitat; also occurs in various other wetland communities with dense vegetation. Does not burrow, builds loosely organized nests. Requires higher areas for flood escape.
Alameda island mole ***Scapanus latimanus parvus***	SSC	Known only from Alameda Island. Found in a variety of habitats, especially annual and perennial grasslands. Prefers moist, friable soils. Avoids flooded soils.
Salt-marsh wandering shrew ***Sorex vagrans halicoetes***	SSC	Salt marshes of the south arm of San Francisco Bay. Medium high marsh 6 to 8 feet above sea level where abundant driftwood is scattered among Salicornia.
American badger ***Taxidea taxus***	SSC	Most abundant in drier open stages of most shrub, forest, and herbaceous habitats, with friable soils. Requires friable soils and open, uncultivated ground. Preys on burrowing rodents.
		BIRDS
great blue heron ***Ardea herodias***	none (breeding sites protected by CDFW)	Year-round resident. Nests colonially or semi-colonially in tall trees and on cliffs, also sequestered terrestrial substrates. Breeding sites usually near foraging areas: marshes, lake margins, tidal flats, and rivers. Forages primarily on fishes and other aquatic prey, also smaller terrestrial vertebrates.
Short-eared owl ***Asio flammeus***	SSC	Occurs year-round, but primarily as a winter visitor, breeding very restricted in most of California. Found in open, treeless areas (e.g., marshes, grasslands) with elevated sites for foraging perches and dense herbaceous vegetation for roosting and nesting. Preys mostly on small mammals, particularly voles.
burrowing owl ***Athene cunicularia***	SSC	Year-round resident and winter visitor. Occurs in open, dry grasslands and scrub habitats with low-growing vegetation, perches and abundant mammal burrows. Preys upon insects and small vertebrates. Nests and roosts in old mammal burrows, most commonly those of ground squirrels.
marbled murrelet ***Brachyramphus marmoratus***	FT, SE	Predominantly coastal marine. Nests in old-growth coniferous forests up to 30 miles inland along the Pacific coast, from Eureka to Oregon border, and in Santa Cruz/San Mateo Counties. Nests are highly cryptic, and typically located on platform-like branches of mature redwoods and Douglas firs. Forages on marine invertebrates and small fishes.
western snowy plover ***Charadrius nivosus (alexandrines) nivosus***	FT, SSC, RP	Federal listing applies only to the Pacific coastal population. Year-round resident and winter visitor. Occurs on sandy beaches, salt pond levees, and the shores of large alkali lakes. Nests on the ground, requiring sandy, gravelly, or friable soils.

SPECIES	STATUS*	HABITAT
Northern harrier ***Circus hudsonius***	SSC	Year-round resident and winter visitor. Found in open habitats including grasslands, prairies, marshes, and agricultural areas. Nests on the ground in dense vegetation, typically near water or otherwise moist areas. Preys on small vertebrates.
yellow rail ***Coturnicops noveboracensis***	SSC	Summer resident in eastern Sierra Nevada in Mono County, breeding in shallow freshwater marshes and wet meadows with dense vegetation, also a rare winter visitor along the coast and other portions of the state. Extremely cryptic.
white-tailed kite ***Elanus leucurus***	CFP	Year-round resident in coastal and valley lowlands with scattered trees and large shrubs, including grasslands, marshes, and agricultural areas. Nests in trees, of which the type and setting are highly variable. Preys on small mammals and other vertebrates.
American peregrine falcon ***Falco peregrinus anatum***	FD, SD, CFP	Year-round resident and winter visitor. Occurs in a wide variety of habitats, though often associated with coasts, bays, marshes and other bodies of water. Nests on protected cliffs and on man-made structures including buildings and bridges. Preys on birds, especially waterbirds. Forages widely.
saltmarsh common yellowthroat ***Geothlypis trichas sinuosa***	SSC	Resident of the San Francisco Bay region, in fresh and saltwater marshes. Requires thick, continuous cover down to water surface for foraging; tall grasses, tule patches, willows for nesting.
California black rail ***Laterallus jamaicensis coturniculus***	ST, CFP	Year-round resident in marshes (saline to freshwater) with dense vegetation within four inches of the ground. Prefers larger, undisturbed marshes that have an extensive upper zone and are close to a major water source. Extremely secretive and cryptic.
Alameda song sparrow ***Melospiza melodia pusillula***	SSC	Year-round resident of salt marshes bordering the south arm of San Francisco Bay. Inhabits primarily pickleweed marshes; nests placed in marsh vegetation, typically shrubs such as gumplant.
black-crowned night heron ***Nycticorax nycticorax***	none (breeding sites protected by CDFW)	Year-round resident. Nests colonially, usually in trees but also in patches of emergent vegetation. Rookery sites are often on islands and usually located adjacent to foraging areas: margins of lakes and bays.
California Ridgway's rail ***Rallus obsoletus obsoletus***	FE, SE, CFP	Year-round resident in tidal marshes of the San Francisco Bay estuary. Requires tidal sloughs and intertidal mud flats for foraging, and dense marsh vegetation for nesting and cover. Typical habitat features abundant growth of cordgrass and pickleweed. Feeds primarily on molluscs and crustaceans.

SPECIES	STATUS*	HABITAT
bank swallow ***Riparia riparia***	ST	Summer resident in riparian and other lowland habitats near rivers, lakes, and the ocean in northern California. Nests colonially in excavated burrows on vertical cliffs and bank cuts (natural and manmade) with fine-textured soils. Historical nesting range in southern and central areas of California has been eliminated by habitat loss. Currently known to breed in Siskiyou, Shasta, and Lassen Cos., portions of the north coast, and along Sacramento River from Shasta Co. south to Yolo Co.
black skimmer ***Rynchops niger***	SSC	Found primarily in southern California; South San Francisco Bay has a small resident population. Nests colonially on gravel bars, low islets, and sandy beaches
California least tern ***Sternula antillarum browni***	FE, SE, CFP	Summer resident along the coast from San Francisco Bay south to northern Baja California; inland breeding also very rarely occurs. Nests colonially on barren or sparsely vegetated areas with sandy or gravelly substrates near water, including beaches, islands, and gravel bars. In San Francisco Bay, has also nested on salt pond margins.
	AMPHIBIANS	
California tiger salamander ***Ambystoma californiense***	FE/FT, ST, RP	Populations in Santa Barbara and Sonoma counties currently listed as endangered; threatened in remainder of range. Inhabits grassland, oak woodland, ruderal and seasonal pool habitats. Adults are fossorial and utilize mammal burrows and other subterranean refugia. Breeding occurs primarily in vernal pools and other seasonal water features.
Santa Cruz black salamander ***Aneides flavipunctatus niger***	SSC	Climbing salamanders of the genus *Aneides* frequent damp woodlands and are usually found hiding under various debris (i.e., bark, woodrat nests, logs). The Santa Cruz black salamander exists south of the San Francisco Bay and was only recently recognized as a separate and protected species. Santa Cruz black salamander is highly sedentary, preferring to stay hidden under riparian debris. Prey items include millipedes, spiders, and other insects (Stebbins and McGinnis 2012).
California giant salamander ***Dicamptodon ensatus***	SSC	Occurs in the north-central Coast Ranges. Moist coniferous and mixed forests are typical habitat; also uses woodland and chaparral. Adults are terrestrial and fossorial, breeding in cold, permanent, or semi-permanent streams. Larvae usually remain aquatic for over a year.
foothill yellow-legged frog ***Rana boylii***	SC, SSC	Found in or adjacent to rocky streams in a variety of habitats. Prefers partly shaded, shallow streams and riffles with a rocky substrate; requires at least some cobble-sized substrate for egg-laying. Needs at least 15 weeks to attain metamorphosis. Feeds on both aquatic and terrestrial invertebrates.

SPECIES	STATUS*	HABITAT
California red-legged frog ***Rana draytonii***	FT, SSC, RP	Lowlands and foothills in or near permanent sources of deep water with dense, shrubby, or emergent riparian vegetation. Requires 11 to 20 weeks of permanent water for larval development. Associated with quiet perennial to intermittent ponds, stream pools and wetlands. Prefers shorelines with extensive vegetation. Disperses through upland habitats after rains.
	REPTILES	
green sea turtle ***Chelonia mydas***	FT	Found in shallow waters inside reefs, bays and inlets with marine grass and algae. Open beaches with a sloping platform and minimal disturbance are required for nesting. This species exhibits high site fidelity.
western pond turtle ***Emys marmorata***	SSC	A thoroughly aquatic turtle of ponds, marshes, rivers, streams, and irrigation ditches with aquatic vegetation. Require basking sites such as partially submerged logs, vegetation mats, or open mud banks, and suitable upland habitat (sandy banks or grassy open fields) for egg-laying.
San Francisco garter snake ***Thamnophis sirtalis tetrataenia***	FE, SE, CFP, RP	Vicinity of freshwater marshes, ponds and slow-moving streams in San Mateo County and extreme northern Santa Cruz County. Prefers dense cover and water depths of at least one foot. Upland areas near water are also very important.
	FISHES	
green sturgeon - southern DPS ***Acipenser medirostris***	FT, SSC	Spawn in the Sacramento River and the Feather River. Spawn at temperatures between 8–14 degrees C. Preferred spawning substrate is large cobble but can range from clean sand to bedrock.
tidewater goby ***Eucyclogobius newberryi***	FE, SSC	Brackish water habitats along the California coast from Agua Hedionda Lagoon, San Diego County to the mouth of the Smith River. Found in shallow lagoons and lower stream reaches; requires still but not stagnant water and high oxygen levels.
delta smelt ***Hypomesus transpacificus***	FT, SE	Lives in the Sacramento-San Joaquin estuary in areas where salt and freshwater systems meet. Occurs seasonally in Suisun Bay, Carquinez Strait and San Pablo Bay. Seldom found at salinities > 10 ppt; most often at salinities < 2 ppt.
hardhead ***Mylopharodon conocephalus***	SSC	Found in low to mid-elevation streams in the Sacramento-San Joaquin drainage; also occurs in the Russian River and tributaries. Favors clear, deep pools with sand-gravel-boulder bottoms and slow water velocity. Not found where exotic Centrarchids predominate.
steelhead - central CA coast DPS ***Oncorhynchus mykiss irideus***	FT	Occurs from the Russian River south to Soquel Creek and Pajaro River, also in San Francisco and San Pablo Bay Basins. Adults migrate upstream to spawn in cool, clear, well-oxygenated streams. Juveniles remain in fresh water for 1 or more years before migrating downstream to the ocean.

SPECIES	STATUS*	HABITAT
longfin smelt ***Spirinchus thaleichthys***	FC, ST, SSC, RP	Euryhaline, nektonic and anadromous. Found in open waters of estuaries, mostly in middle or bottom of water column. Prefer salinities of 15 to 30 ppt but can be found in completely freshwater to almost pure seawater.
	INVERTEBRATES	
Crotch bumble bee ***Bombus crotchii***	SC	Range largely restricted to California, favoring grassland and scrub habitats. Typical of bumble bees, nests are usually constructed underground.
western bumble bee ***Bombus occidentalis***	SC	Formerly common throughout much of western North America; populations from southern British Columbia to central California have nearly disappeared (Xerces 2015). Occurs in a wide variety of habitat types. Nests are constructed annually in pre-existing cavities, usually on the ground (e.g., mammal burrows). Many plant species are visited and pollinated.
San Bruno elfin butterfly ***Callophrys mossii bayensis***	FE	Limited to the vicinity of San Bruno Mountain, San Mateo County. Colonies are located on in rocky outcrops and cliffs in coastal scrub habitat on steep, north-facing slopes within the fog belt. Species range is tied to the distribution of the larval host plant, *Sedum spathulifolium*.
monarch butterfly ***Danaus plexippus***	Winter roosts protected by CDFW	Winter roost sites extend along the coast from northern Mendocino to Baja California, Mexico. Roosts located in wind-protected tree groves (eucalyptus, Monterey pine, Monterey cypress), with nectar and water sources nearby.
Bay checkerspot butterfly ***Euphydryas editha bayensis***	FT, RP	Restricted to native grasslands on outcrops of serpentine soil in the vicinity of San Francisco Bay. *Plantago erecta* is the primary host plant; *Orthocarpus densiflorus* and *O. purpurscens* are the secondary host plants.
Mission blue butterfly ***Icaricia icarioides missionensis***	FE, RP	Inhabits grasslands and coastal chaparral of the San Francisco Peninsula and southern Marin County, but mostly found on San Bruno Mountain. Three larval host plants: *Lupinus albifrons*, *L. variicolor*, and *L. formosus*, of which *L. albifrons* is favored.
callippe silverspot butterfly ***Speyeria callippe callippe***	FE	Two populations in San Bruno Mountain and the Cordelia Hills are recognized. Hostplant is Viola pedunculata, which is found on serpentine soils. Most adults found on east-facing slopes; males congregate on hilltops in search of females.
Myrtle's silverspot butterfly ***Speyeria zerene myrtleae***	FE, RP	Restricted to the fog belt of northern Marin and southernmost Sonoma County, including the Point Reyes peninsula; extirpated from coastal San Mateo County. Occurs in coastal prairie, dunes, and grassland. Larval foodplant is typically *Viola adunca*. Adult flight season may range from late June to early September.

*** Key to status codes:**

FE	Federal Endangered
FT	Federal Threatened
FD	Federal Delisted
SE	State Endangered
SR	State Rare
ST	State Threatened
SC	State Candidate
SSC	California Department of Fish and Wildlife Species of Special Concern
WBWG	Western Bat Working Group Priority Species
RP	Published Recovery Plan
MMC SSC	Marine Mammal Commission Species of Special Concern
CFP	California Department of Fish and Wildlife Fully Protected Animal
Rank 1A	California Rare Plant Rank 1A: Presumed extirpated in California and either rare or extinct elsewhere
Rank 1B	California Rare Plant Rank 1B: Plants rare, threatened, or endangered in California and elsewhere
Rank 1B.1	California Rare Plant Rank 1B.1: Plants rare, threatened, or endangered in California and elsewhere (seriously threatened in California)
Rank 1B.2	California Rare Plant Rank 1B.2: Plants rare, threatened, or endangered in California and elsewhere (moderately threatened in California)
Rank 1B.3	California Rare Plant Rank 1B.3: Plants rare, threatened, or endangered in California and elsewhere (not very threatened in California)
Rank 2B	California Rare Plant Rank 2B: Plants rare, threatened, or endangered in California, but more common elsewhere
Rank 2B.1	California Rare Plant Rank 2B.1: Plants rare, threatened, or endangered in California, but more common elsewhere (seriously threatened in California)
Rank 2B.2	California Rare Plant Rank 2B.2: Plants rare, threatened, or endangered in California, but more common elsewhere (moderately threatened in California)
Rank 3	California Rare Plant Rank 3: Plants about which more information is needed (a review list)
Rank 3.2	California Rare Plant Rank 3.2: Plants about which more information is needed (a review list; moderately threatened in California)
Rank 4	California Rare Plant Rank 4: Plants of limited distribution - a watch list
Rank 4.2	California Rare Plant Rank 4.2: Plants of limited distribution - a watch list (moderately threatened in California)
Rank 4.3	California Rare Plant Rank 4.3: Plants of limited distribution - a watch list (not very threatened in California)

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Appendix E: Noise Analysis
Technical Appendices

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Appendix E: Noise Analysis Technical Appendices

Ambient Noise Monitoring Data Summary

TABLE 1: SUMMARY OF SITE LT1 NOISE MONITORING DATA

Date	Time	Duration	Leq	CNEL	Lmin	Lmax	L(01)	L(08)	L(16)	L(25)	L(50)	L(90)
7/25/2023	12:00 PM	1 hour	48.9	48.9	36.3	74.9	56.7	52.9	51.1	49.9	45.9	42.1
7/25/2023	1:00 PM	1 hour	45.0	45.0	36.3	65.6	52.7	49.8	46.7	45.0	41.9	39.0
7/25/2023	2:00 PM	1 hour	43.6	43.6	36.3	62.9	49.6	47.3	44.6	43.9	42.1	40.1
7/25/2023	3:00 PM	1 hour	46.7	46.7	37.9	64.6	52.2	49.8	48.4	47.6	45.4	42.9
7/25/2023	4:00 PM	1 hour	47.5	47.5	38.3	63.6	52.2	50.4	49.3	48.5	46.4	44.0
7/25/2023	5:00 PM	1 hour	50.9	50.9	41.3	75.8	58.4	54.3	52.2	51.2	48.7	45.9
7/25/2023	6:00 PM	1 hour	52.7	52.7	43.1	66.7	57.5	56.0	54.8	53.7	51.7	48.4
7/25/2023	7:00 PM	1 hour	50.8	55.8	42.5	65.7	56.3	53.8	52.7	51.8	49.6	46.6
7/25/2023	8:00 PM	1 hour	52.8	57.8	43.8	63.7	57.5	55.8	54.7	53.8	51.9	48.8
7/25/2023	9:00 PM	1 hour	50.0	55.0	39.0	62.2	54.3	53.1	51.9	51.1	49.2	46.2
7/25/2023	10:00 PM	1 hour	47.2	57.2	38.9	68.6	52.9	50.2	48.9	48.0	46.1	43.2
7/25/2023	11:00 PM	1 hour	45.9	55.9	37.2	56.9	49.6	48.6	47.8	47.1	45.3	42.6
7/26/2023	12:00 AM	1 hour	45.0	55.0	35.2	57.9	49.7	48.3	47.3	46.3	43.9	40.6
7/26/2023	1:00 AM	1 hour	40.2	50.2	33.9	51.7	44.3	42.9	41.9	41.3	39.5	37.1
7/26/2023	2:00 AM	1 hour	40.4	50.4	34.3	53.5	44.0	42.8	41.7	41.1	39.9	38.0
7/26/2023	3:00 AM	1 hour	39.5	49.5	34.6	50.3	42.5	41.4	40.7	40.1	39.1	37.7
7/26/2023	4:00 AM	1 hour	40.8	50.8	36.5	50.3	43.5	42.6	41.9	41.5	40.5	39.1
7/26/2023	5:00 AM	1 hour	45.5	55.5	39.0	66.6	51.4	48.4	47.2	46.0	43.7	42.5
7/26/2023	6:00 AM	1 hour	47.9	57.9	41.1	60.0	52.5	51.0	49.9	48.9	46.7	45.0
7/26/2023	7:00 AM	1 hour	47.7	47.7	43.3	65.9	52.8	49.9	48.9	48.1	46.5	45.5
7/26/2023	8:00 AM	1 hour	47.8	47.8	41.6	63.7	53.2	51.0	49.7	48.7	46.4	44.5
7/26/2023	9:00 AM	1 hour	47.5	47.5	41.0	64.8	52.8	50.4	49.2	48.3	46.2	44.1
7/26/2023	10:00 AM	1 hour	47.7	47.7	40.9	64.5	52.4	50.5	49.4	48.5	46.8	44.1
7/26/2023	11:00 AM	1 hour	46.9	46.9	38.1	68.2	53.5	50.5	48.0	47.2	45.3	42.3
Daytime (7 AM to 7 PM)			*48.4*	--	*36.3*	*74.9*	*54.4*	*51.7*	*50.1*	*49.1*	*46.9*	*44.3*
Evening (7 PM to 10 PM)			*51.4*	--	*41.3*	*75.8*	*56.2*	*54.4*	*53.3*	*52.4*	*50.4*	*47.4*
Nightime (10 PM to 7 AM)			*44.7*	--	*33.9*	*68.6*	*49.4*	*47.5*	*46.5*	*45.6*	*43.6*	*41.4*
	24-hour CNEL		--	***53.0***								

TABLE 2: SUMMARY OF SHORT-TERM NOISE MONITORING DATA

Site	Date	Time	Duration	Leq	Lmin	Lmax	L(01)	L(08)	L(10)	L(25)	L(50)	L(90)
ST-1	7/26/2023	8:50 AM	20 minutes	57.7	40.5	76.1	64.9	62.6	61.7	57.7	55.3	52.8
ST-2	7/26/2023	8:18 AM	20 minutes	61.8	41.2	81.2	67.6	65.9	65.5	63.3	60.2	55.3
ST-3	7/25/2023	1:41 PM	20 minutes	46.8	34.6	63.9	53.2	50.2	49.8	47.7	45.6	42.3
ST-4	7/25/2023	1:11 PM	20 minutes	44.7	35.9	67.8	52.5	48.0	47.6	45.2	42.8	40.5
ST-5	7/26/2023	9:21 AM	20 minutes	54.9	37.1	77.5	61.8	59.4	59.0	55.1	53.0	50.3
ST-6	7/25/2023	12:36 PM	20 minutes	52.1	36.3	76.8	58.5	57.1	56.8	53.9	48.4	43.0
ST-7	7/26/2023	9:52 AM	20 minutes	55.5	51.3	72.7	57.7	56.3	56.2	55.8	55.4	54.7

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Appendix E: Noise Analysis Technical Appendices

TABLE 3: SUMMARY OF LONG-TERM NOISE MONITORING DATA (for Comparison to ST sites)												
Site	**Date**	**Time**	**Duration**	**Leq**	**Lmin**	**Lmax**	**L(01)**	**L(08)**	**L(16)**	**L(25)**	**L(50)**	**L(90)**
LT-1	7/26/2023	8:50 AM	20 minutes	48.6	41.6	63.9	54.2	52.1	50.5	49.4	47.3	44.1
LT-1	7/26/2023	8:18 AM	20 minutes	46.3	41.8	63.7	51.6	48.8	47.6	46.7	45.0	43.8
LT-1	7/25/2023	1:41 PM	20 minutes	44.6	36.7	64.0	53.3	49.0	45.2	44.3	40.8	38.5
LT-1	7/25/2023	1:11 PM	20 minutes	43.5	36.3	60.3	48.9	47.3	45.2	44.3	42.2	39.4
LT-1	7/26/2023	9:21 AM	20 minutes	46.7	42.6	55.7	50.4	49.2	48.3	47.5	45.9	44.5
LT-1	7/25/2023	12:36 PM	20 minutes	48.3	37.4	68.0	55.2	52.7	51.3	50.0	43.8	40.9
LT-1	7/26/2023	9:52 AM	20 minutes	48.4	41.0	64.8	55.6	51.3	49.9	48.9	46.7	43.2

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Traffic Noise Modeling Data

Sheet	Information
1	ADT AND CNEL SUMMARY/COMPARISON (2020 EXISTING TO 2040 NO PROJECT)
2	ADT AND CNEL SUMMARY/COMPARISON (2020 EXISTING TO 2040 PLUS PROJECT)
3	ADT AND CNEL SUMMARY/COMPARISON (2040 NO PROJECT TO 2040 PLUS PROJECT)
4	ADT AND CNEL SUMMARY/COMPARISON (2020 EXISTING TO 2020 PLUS PROJECT)
5	TRAFFIC NOISE MODEL (TNM) ROADWAY GEOMETRY INPUTS
6	2020 EXISTING TRAFFIC NOISE CONTOURS
7	2020 EXISTING CONDITIONS TNM TRAFFIC VOLUME PERCENTAGES
8	2020 EXISTING CONDITIONS MODELED TRAFFIC VOLUMES
9	2020 PLUS PROJECT TRAFFIC NOISE CONTOURS
10	2020 PLUS PROJECT TNM TRAFFIC VOLUME PERCENTAGES
11	2020 PLUS PROJECT MODELED TRAFFIC VOLUMES
12	2040 WITHOUT PROJECT TRAFFIC NOISE CONTOURS
13	2040 WITHOUT PROJECT TNM TRAFFIC VOLUME PERCENTAGES
14	2040 WITHOUT PROJECT MODELED TRAFFIC VOLUMES
15	2040 PLUS PROJECT TRAFFIC NOISE CONTOURS
16	2040 PLUS PROJECT TNM TRAFFIC VOLUME PERCENTAGES
17	2040 PLUS PROJECT MODELED TRAFFIC VOLUMES

SHEET 1: ADT AND CNEL SUMMARY/COMPARISON (2020 EXISTING TO 2040 NO PROJECT)

Road/Segment	2020 Existing		2040 No Project		Net Change		Notes
	ADT	CNEL	ADT	CNEL	ADT	CNEL	
Black Mountain Rd							
Wedgewood Dr to Hayne Rd	2,694	51.8	2,622	51.7	-72	-0.1	A,B
Hayne Rd/West Santa Inez Ave to West Santa Inez Ave	4,080	53.2	3,957	53.1	-123	-0.1	A,B
Chateau Dr							
Ralston Ave to Provident Dr	3,186	51.7	3,119	51.6	-67	-0.1	A,B
Provident Dr to Skyline Blvd (City Limit)	2,406	52.9	2,646	53.3	240	0.4	A,B
Crystal Springs Rd							
Polhemus Rd (City Limit) to Woodridge Rd	2,139	55.7	3,193	57.4	1,055	1.7	A,B
Woodridge Rd to Ridgeway Rd	4,098	61.0	4,925	61.8	828	0.8	A,B
Ridgeway Rd to Alameda De Las Pulgas	8,078	57.0	8,714	57.3	636	0.3	A,B
Alameda De Las Pulgas to Harvard Rd	2,332	49.9	3,475	51.6	1,143	1.7	A,B
Harvard Rd to 3rd Ave	2,332	49.9	3,475	51.6	1,143	1.7	A,B
3rd Ave to El Camino Real	1,445	47.1	1,884	48.3	438	1.2	A,B
El Cerrito Ave							
Brentwood Rd to Crystal Springs Rd	4,831	58.8	5,515	59.4	684	0.6	A,B
Floribunda Ave							
El Camino Real (City Limit) to Sharon Ave / Hillsborough Blvd	3,381	53.3	4,091	54.1	709	0.8	A,B
Sharon Ave/Hillsborough Blvd to Eucalyptus Ave	1,213	48.6	1,304	48.9	90	0.3	A,B
Forest View Ave							
Eucalyptus Ave to Sharon Ave	2,481	51.9	2,202	51.4	-278	-0.5	A,B
Sharon Ave to El Camino Real (City Limit)	2,481	51.8	2,604	52.0	123	0.2	A,B
Hayne Rd							
Skyline Blvd (City Limit) to Mosely Rd	10,177	61.9	11,166	62.3	989	0.4	A,B
Mosely Rd to Sandra Rd	7,528	55.7	8,680	56.3	1,152	0.6	A,B
Sandra Rd to Black Mountain Rd	4,080	53.2	3,957	53.1	-123	-0.1	A,B
Hillsborough Blvd							
Sharon Ave / Floribunda Ave to Ralston Ave	920	45.1	1,745	47.9	825	2.8	A,B
Ralston Ave to Barroilhet Ave	836	45.9	1,660	48.9	824	3.0	A,B
Barroilhet Ave to Bromfield Rd	908	46.1	1,731	48.9	822	2.8	A,B
Bromfield Rd to Edgewood Rd	111	38.6	110	38.6	-1	0.0	A,B
Ralston Ave							
El Camino Real (City Limit) to Crescent Ave	3,041	53.0	3,191	53.2	150	0.2	A,B
Crescent Ave to Occidental Ave	4,781	54.2	5,665	54.9	884	0.7	A,B
Occidental Ave to Hillsborough Blvd	1,027	46.5	928	46.1	-99	-0.4	A,B
Hillsborough Blvd to Eucalyptus Ave	943	47.5	844	47.0	-100	-0.5	A,B
Eucalyptus Ace to Chateau Rd	3,186	52.6	3,119	52.5	-67	-0.1	A,B

SHEET 1: ADT AND CNEL SUMMARY/COMPARISON (2020 EXISTING TO 2040 NO PROJECT)

Road/Segment	2020 Existing		2040 No Project		Net Change		Notes
	ADT	CNEL	ADT	CNEL	ADT	CNEL	
Sharon Ave							
Forest View Ave to Floribunda Ave / Hillsborough Blvd	1,492	46.8	2,493	49.0	1,001	2.2	A,B
Summit Dr							
Skyline Blvd to Bella Vista Dr	3,950	53.1	3,951	53.1	1	0.0	A,B
Bella Vista Dr to Oakdale Rd	3,074	51.5	3,086	51.5	12	0.0	A,B
Tartan Trail							
Black Mountain Rd to Crystal Springs Rd	1,959	51.3	1,732	50.8	-227	-0.5	A,B
Tournament Dr							
Sugar Hill Dr to Tobin Clark Dr	242	40.6	366	42.4	124	1.8	A,B
West Santa Inez Ave							
Hillsborough Blvd to Roblar Ave	4,301	53.1	4,177	53.0	-124	-0.1	A,B
Roblar Ave to El Camino Real	3,422	55.0	3,323	54.9	-99	-0.1	A,B
State Route 35 (Skyline Boulevard)							
Hayne Road to La Strada Ct (City Limit)	1,194	54.3	1,980	56.5	786	2.2	A,B
State Route 82 (El Camino Real)							
Forest View Ave to Ralston Ave	10,172	61.6	15,215	63.3	5,044	1.7	A,B
State Route 92							
Alameda De Las Pulgas to De Anza Blvd	28,503	69.3	34,145	70.1	5,642	0.8	A,B
Interstate 280 (Northbound)							
Northern City Limit to SR 35	74,478	75.9	95,905	77.0	21,427	1.1	A,B
Interstate 280 (Southbound)							
Northern City Limit to SR 35	86,354	76.9	100,369	77.6	14,014	0.7	A,B

Notes

A. ADT is average daily traffic volume. ADT is bi-directional for all road segments except I-280. Traffic volumes obtained from the travel demand modeling conducted for the Project.

B. CNEL is estimated at 50 feet from the road center for all road segments except SR 92 and I-280, which is estimated at 100 feet from the road center.

SHEET 2: ADT AND CNEL SUMMARY/COMPARISON (2020 EXISTING TO 2040 PLUS PROJECT)

Road/Segment	2020 Existing		2040 Plus Project		Net Change		Notes
	ADT	CNEL	ADT	CNEL	ADT	CNEL	
Black Mountain Rd							
Wedgewood Dr to Hayne Rd	2,694	51.8	2,895	52.1	201	0.3	A,B
Hayne Rd/West Santa Inez Ave to West Santa Inez Ave	4,080	53.2	4,002	53.1	-78	-0.1	A,B
Chateau Dr							
Ralston Ave to Provident Dr	3,186	51.7	3,471	52.1	285	0.4	A,B
Provident Dr to Skyline Blvd (City Limit)	2,406	52.9	2,939	53.8	533	0.9	A,B
Crystal Springs Rd							
Polhemus Rd (City Limit) to Woodridge Rd	2,139	55.7	3,214	57.5	1,075	1.8	A,B
Woodridge Rd to Ridgeway Rd	4,098	61.0	5,113	62.0	1,015	1.0	A,B
Ridgeway Rd to Alameda De Las Pulgas	8,078	57.0	9,161	57.5	1,083	0.5	A,B
Alameda De Las Pulgas to Harvard Rd	2,332	49.9	3,555	51.7	1,223	1.8	A,B
Harvard Rd to 3rd Ave	2,332	49.9	3,555	51.7	1,223	1.8	A,B
3rd Ave to El Camino Real	1,445	47.1	1,903	48.3	458	1.2	A,B
El Cerrito Ave							
Brentwood Rd to Crystal Springs Rd	4,831	58.8	5,874	59.6	1,043	0.8	A,B
Floribunda Ave							
El Camino Real (City Limit) to Sharon Ave / Hillsborough Blvd	3,381	53.3	4,370	54.4	989	1.1	A,B
Sharon Ave/Hillsborough Blvd to Eucalyptus Ave	1,213	48.6	1,428	49.3	215	0.7	A,B
Forest View Ave							
Eucalyptus Ave to Sharon Ave	2,481	51.9	2,457	51.9	-24	0.0	A,B
Sharon Ave to El Camino Real (City Limit)	2,481	51.8	2,886	52.5	405	0.7	A,B
Hayne Rd							
Skyline Blvd (City Limit) to Mosely Rd	10,177	61.9	11,457	62.4	1,280	0.5	A,B
Mosely Rd to Sandra Rd	7,528	55.7	8,736	56.3	1,208	0.6	A,B
Sandra Rd to Black Mountain Rd	4,080	53.2	4,002	53.1	-78	-0.1	A,B
Hillsborough Blvd							
Sharon Ave / Floribunda Ave to Ralston Ave	920	45.1	1,761	47.9	842	2.8	A,B
Ralston Ave to Barroilhet Ave	836	45.9	1,669	48.9	833	3.0	A,B
Barroilhet Ave to Bromfield Rd	908	46.1	1,751	49.0	843	2.9	A,B
Bromfield Rd to Edgewood Rd	111	38.6	127	39.2	17	0.6	A,B
Ralston Ave							
El Camino Real (City Limit) to Crescent Ave	3,041	53.0	384	44.0	-2,656	-9.0	A,B
Crescent Ave to Occidental Ave	4,781	54.2	5,713	55.0	932	0.8	A,B
Occidental Ave to Hillsborough Blvd	1,027	46.5	1,047	46.6	20	0.1	A,B
Hillsborough Blvd to Eucalyptus Ave	943	47.5	955	47.6	11	0.1	A,B
Eucalyptus to Chateau	3,186	52.6	3,471	53.0	285	0.4	A,B

SHEET 2: ADT AND CNEL SUMMARY/COMPARISON (2020 EXISTING TO 2040 PLUS PROJECT)

Road/Segment	2020 Existing		2040 Plus Project		Net Change		Notes
	ADT	CNEL	ADT	CNEL	ADT	CNEL	
Sharon Ave							
Forest View Ave to Floribunda Ave / Hillsborough Blvd	1,492	46.8	2,739	49.4	1,247	2.6	A,B
Summit Dr							
Skyline Blvd to Bella Vista Dr	3,950	53.1	4,312	53.5	361	0.4	A,B
Bella Vista Dr to Oakdale Rd	3,074	51.5	3,233	51.7	159	0.2	A,B
Tartan Trail							
Black Mountain Rd to Crystal Springs Rd	1,959	51.3	1,899	51.2	-60	-0.1	A,B
Tournament Dr							
Sugar Hill Dr to Tobin Clark Dr	242	40.6	441	43.2	199	2.6	A,B
West Santa Inez Ave							
Hillsborough Blvd to Roblar Ave	4,301	53.1	4,257	53.1	-44	0.0	A,B
Roblar Ave to El Camino Real	3,422	55.0	3,224	54.7	-198	-0.3	A,B
State Route 35 (Skyline Boulevard)							
Hayne Road to La Strada Ct (City Limit)	1,194	54.3	2,075	56.7	881	2.4	A,B
State Route 82 (El Camino Real)							
Forest View Ave to Ralston Ave	10,172	61.6	15,224	63.4	5,052	1.8	A,B
State Route 92							
Alameda De Las Pulgas to De Anza Blvd	28,503	69.3	34,130	70.1	5,627	0.8	A,B
Interstate 280 (Northbound)							
Northern City Limit to SR 35	74,478	75.9	96,020	77.0	21,542	1.1	A,B
Interstate 280 (Southbound)							
Northern City Limit to SR 35	86,354	76.9	100,450	77.6	14,095	0.7	A,B

Notes

A. ADT is average daily traffic volume. ADT is bi-directional for all road segments except I-280. Traffic volumes obtained from the travel demand modeling conducted for the Project.

B. CNEL is estimated at 50 feet from the road center for all road segments except SR 92 and I-280, which is estimated at 100 feet from the road center.

SHEET 3: ADT AND CNEL SUMMARY/COMPARISON (2040 NO PROJECT TO 2040 PLUS PROJECT)

Road/Segment	2040 No Project		2040 Plus Project		Net Change		Notes
	ADT	CNEL	ADT	CNEL	ADT	CNEL	
Black Mountain Rd							
Wedgewood Dr to Hayne Rd	2,622	51.7	2,895	52.1	273	0.4	A,B
Hayne Rd/West Santa Inez Ave to West Santa Inez Ave	3,957	53.1	4,002	53.1	45	0.0	A,B
Chateau Dr							
Ralston Ave to Provident Dr	3,119	51.6	3,471	52.1	352	0.5	A,B
Provident Dr to Skyline Blvd (City Limit)	2,646	53.3	2,939	53.8	293	0.5	A,B
Crystal Springs Rd							
Polhemus Rd (City Limit) to Woodridge Rd	3,193	57.4	3,214	57.5	20	0.0	A,B
Woodridge Rd to Ridgeway Rd	4,925	61.8	5,113	62.0	188	0.2	A,B
Ridgeway Rd to Alameda De Las Pulgas	8,714	57.3	9,161	57.5	447	0.2	A,B
Alameda De Las Pulgas to Harvard Rd	3,475	51.6	3,555	51.7	80	0.1	A,B
Harvard Rd to 3rd Ave	3,475	51.6	3,555	51.7	80	0.1	A,B
3rd Ave to El Camino Real	1,884	48.3	1,903	48.3	19	0.0	A,B
El Cerrito Ave							
Brentwood Rd to Crystal Springs Rd	5,515	59.4	5,874	59.6	359	0.3	A,B
Floribunda Ave							
El Camino Real (City Limit) to Sharon Ave / Hillsborough Blvd	4,091	54.1	4,370	54.4	279	0.3	A,B
Sharon Ave/Hillsborough Blvd to Eucalyptus Ave	1,304	48.9	1,428	49.3	124	0.4	A,B
Forest View Ave							
Eucalyptus Ave to Sharon Ave	2,202	51.4	2,457	51.9	255	0.5	A,B
Sharon Ave to El Camino Real (City Limit)	2,604	52.0	2,886	52.5	282	0.4	A,B
Hayne Rd							
Skyline Blvd (City Limit) to Mosely Rd	11,166	62.3	11,457	62.4	291	0.1	A,B
Mosely Rd to Sandra Rd	8,680	56.3	8,736	56.3	57	0.0	A,B
Sandra Rd to Black Mountain Rd	3,957	53.1	4,002	53.1	45	0.0	A,B
Hillsborough Blvd							
Sharon Ave / Floribunda Ave to Ralston Ave	1,745	47.9	1,761	47.9	17	0.0	A,B
Ralston Ave to Barroilhet Ave	1,660	48.9	1,669	48.9	9	0.0	A,B
Barroilhet Ave to Bromfield Rd	1,731	48.9	1,751	49.0	20	0.1	A,B
Bromfield Rd to Edgewood Rd	110	38.6	127	39.2	18	0.6	A,B
Ralston Ave							
El Camino Real (City Limit) to Crescent Ave	3,191	53.2	384	44.0	-2,807	-9.2	A,B
Crescent Ave to Occidental Ave	5,665	54.9	5,713	55.0	47	0.0	A,B
Occidental Ave to Hillsborough Blvd	928	46.1	1,047	46.6	119	0.5	A,B
Hillsborough Blvd to Eucalyptus Ave	844	47.0	955	47.6	111	0.5	A,B
Eucalyptus to Chateau	3,119	52.5	3,471	53.0	352	0.5	A,B

SHEET 3: ADT AND CNEL SUMMARY/COMPARISON (2040 NO PROJECT TO 2040 PLUS PROJECT)

Road/Segment	2040 No Project		2040 Plus Project		Net Change		Notes
	ADT	CNEL	ADT	CNEL	ADT	CNEL	
Sharon Ave							
Forest View Ave to Floribunda Ave / Hillsborough Blvd	2,493	49.0	2,739	49.4	246	0.4	A,B
Summit Dr							
Skyline Blvd to Bella Vista Dr	3,951	53.1	4,312	53.5	361	0.4	A,B
Bella Vista Dr to Oakdale Rd	3,086	51.5	3,233	51.7	147	0.2	A,B
Tartan Trail							
Black Mountain Rd to Crystal Springs Rd	1,732	50.8	1,899	51.2	167	0.4	A,B
Tournament Dr							
Sugar Hill Dr to Tobin Clark Dr	366	42.4	441	43.2	75	0.8	A,B
West Santa Inez Ave							
Hillsborough Blvd to Roblar Ave	4,177	53.0	4,257	53.1	80	0.1	A,B
Roblar Ave to El Camino Real	3,323	54.9	3,224	54.7	-99	-0.1	A,B
State Route 35 (Skyline Boulevard)							
Hayne Road to La Strada Ct (City Limit)	1,980	56.5	2,075	56.7	95	0.2	A,B
State Route 82 (El Camino Real)							
Forest View Ave to Ralston Ave	15,215	63.3	15,224	63.4	8	0.0	A,B
State Route 92							
Alameda De Las Pulgas to De Anza Blvd	34,145	70.1	34,130	70.1	-15	0.0	A,B
Interstate 280 (Northbound)							
Northern City Limit to SR 35	95,905	77.0	96,020	77.0	115	0.0	A,B
Interstate 280 (Southbound)							
Northern City Limit to SR 35	100,369	77.6	100,450	77.6	81	0.0	A,B

Notes

A. ADT is average daily traffic volume. ADT is bi-directional for all road segments except I-280. Traffic volumes obtained from the travel demand modeling conducted for the Project.

B. CNEL is estimated at 50 feet from the road center for all road segments except SR 92 and I-280, which is estimated at 100 feet from the road center.

SHEET 4: ADT AND CNEL SUMMARY/COMPARISON (2020 EXISTING TO 2020 PLUS PROJECT)

Road/Segment	2020 Existing		2020 Plus Project		Net Change		Notes
	ADT	CNEL	ADT	CNEL	ADT	CNEL	
Black Mountain Rd							
Wedgewood Dr to Hayne Rd	2,694	51.8	2,957	52.2	262	0.4	A,B
Hayne Rd/West Santa Inez Ave to West Santa Inez Ave	4,080	53.2	4,063	53.2	-17	0.0	A,B
Chateau Dr							
Ralston Ave to Provident Dr	3,186	51.7	3,534	52.2	349	0.5	A,B
Provident Dr to Skyline Blvd (City Limit)	2,406	52.9	2,645	53.3	239	0.4	A,B
Crystal Springs Rd							
Polhemus Rd (City Limit) to Woodridge Rd	2,139	55.7	2,149	55.7	10	0.0	A,B
Woodridge Rd to Ridgeway Rd	4,098	61.0	4,302	61.2	204	0.2	A,B
Ridgeway Rd to Alameda De Las Pulgas	8,078	57.0	8,581	57.3	502	0.3	A,B
Alameda De Las Pulgas to Harvard Rd	2,332	49.9	2,402	50.0	69	0.1	A,B
Harvard Rd to 3rd Ave	2,332	49.9	2,402	50.0	69	0.1	A,B
3rd Ave to El Camino Real	1,445	47.1	1,485	47.2	40	0.1	A,B
El Cerrito Ave							
Brentwood Rd to Crystal Springs Rd	4,831	58.8	5,189	59.1	358	0.3	A,B
Floribunda Ave							
El Camino Real (City Limit) to Sharon Ave / Hillsborough Blvd	3,381	53.3	3,667	53.7	285	0.4	A,B
Sharon Ave/Hillsborough Blvd to Eucalyptus Ave	1,213	48.6	1,334	49.0	120	0.4	A,B
Forest View Ave							
Eucalyptus Ave to Sharon Ave	2,481	51.9	2,738	52.3	257	0.4	A,B
Sharon Ave to El Camino Real (City Limit)	2,481	51.8	2,738	52.2	257	0.4	A,B
Hayne Rd							
Skyline Blvd (City Limit) to Mosely Rd	10,177	61.9	10,449	62.0	272	0.1	A,B
Mosely Rd to Sandra Rd	7,528	55.7	7,545	55.7	17	0.0	A,B
Sandra Rd to Black Mountain Rd	4,080	53.2	4,063	53.2	-17	0.0	A,B
Hillsborough Blvd							
Sharon Ave / Floribunda Ave to Ralston Ave	920	45.1	950	45.2	30	0.1	A,B
Ralston Ave to Barroilhet Ave	836	45.9	859	46.0	23	0.1	A,B
Barroilhet Ave to Bromfield Rd	908	46.1	943	46.3	35	0.2	A,B
Bromfield Rd to Edgewood Rd	111	38.6	128	39.3	18	0.7	A,B
Ralston Ave							
El Camino Real (City Limit) to Crescent Ave	3,041	53.0	3,104	53.1	64	0.1	A,B
Crescent Ave to Occidental Ave	4,781	54.2	4,844	54.3	63	0.1	A,B
Occidental Ave to Hillsborough Blvd	1,027	46.5	1,149	47.0	122	0.5	A,B
Hillsborough Blvd to Eucalyptus Ave	943	47.5	1,058	48.0	115	0.5	A,B
Eucalyptus to Chateau	3,186	52.6	3,534	53.1	349	0.5	A,B

SHEET 4: ADT AND CNEL SUMMARY/COMPARISON (2020 EXISTING TO 2020 PLUS PROJECT)

Road/Segment	2020 Existing		2020 Plus Project		Net Change		Notes
	ADT	CNEL	ADT	CNEL	ADT	CNEL	
Sharon Ave							
Forest View Ave to Floribunda Ave / Hillsborough Blvd	1,492	46.8	1,653	47.2	162	0.4	A,B
Summit Dr							
Skyline Blvd to Bella Vista Dr	3,950	53.1	4,278	53.4	328	0.3	A,B
Bella Vista Dr to Oakdale Rd	3,074	51.5	3,226	51.7	152	0.2	A,B
Tartan Trail							
Black Mountain Rd to Crystal Springs Rd	1,959	51.3	1,671	50.6	-289	-0.7	A,B
Tournament Dr							
Sugar Hill Dr to Tobin Clark Dr	242	40.6	293	41.4	51	0.8	A,B
West Santa Inez Ave							
Hillsborough Blvd to Roblar Ave	4,301	53.1	4,320	53.1	19	0.0	A,B
Roblar Ave to El Camino Real	3,422	55.0	3,375	54.9	-47	-0.1	A,B
State Route 35 (Skyline Boulevard)							
Hayne Road to La Strada Ct (City Limit)	1,194	54.3	1,252	54.5	57	0.2	A,B
State Route 82 (El Camino Real)							
Forest View Ave to Ralston Ave	10,172	61.6	10,147	61.6	-25	0.0	A,B
State Route 92							
Alameda De Las Pulgas to De Anza Blvd	28,503	69.3	28,427	69.3	-76	0.0	A,B
Interstate 280 (Northbound)							
Northern City Limit to Crystal Springs Rd	74,478	75.9	74,371	75.9	-107	0.0	A,B
Interstate 280 (Southbound)							
Northern City Limit to Crystal Springs Rd	86,354	76.9	86,231	76.9	-124	0.0	A,B

Notes

A. ADT is average daily traffic volume. ADT is bi-directional for all road segments except I-280. Traffic volumes obtained from the travel demand modeling conducted for the Project.

B. CNEL is estimated at 50 feet from the road center for all road segments except SR 92 and I-280, which is estimated at 100 feet from the road center.

SHEET 5: TRAFFIC NOISE MODEL (TNM) ROADWAY GEOMETRY INPUTS

Road/Segment	Class	Max Daily Volume (Vehicles)	Travel Lanes		Road Width (Feet)			Vehicle Speed (MPH)	Notes
			Each Direction	Total	Each Direction	Paved Area	ROW		
Black Mountain Rd									
Wedgewood Dr to Hayne Rd	Collector	7600	1	2	14	28	30	25	A
Hayne Rd/West Santa Inez Ave to West Santa Inez Ave	Collector	7600	1	2	10	20	32	25	A
Chateau Dr									
Ralston Ave to Provident Dr	Collector	7600	1	2	16	32	38	25	A,B
Provident Dr to Skyline Blvd (City Limit)	Collector	7600	1	2	12.5	25	40	25	A
Crystal Springs Rd									
Polhemus Rd (City Limit) to Woodridge Rd	Minor	8800	1	2	16	32	43	45	A
Woodridge Rd to Ridgeway Rd	Minor Arterial	8800	1	2	12.5	25	25	45	A, B
Ridgeway Rd to Alameda De Las Pulgas	Minor Arterial	8800	1	2	10	20	30	25	A
Alameda De Las Pulgas to Harvard Rd	Minor Arterial	8800	1	2	14	28	30	25	A
Harvard Rd to 3rd Ave	Minor Arterial	8800	1	2	14	28	34	25	A
3rd Ave to El Camino Real	Minor Arterial	8800	1	2	20	40	40	25	A
El Cerrito Ave									
Brentwood Rd to Crystal Springs Rd	Collector	7600	1	2	10	20	30	35	A, B
Floribunda Ave									
El Camino Real (City Limit) to Sharon Ave / Hillsborough Blvd	Local	1600	1	2	11	22	32	25	A
Sharon Ave/Hillsborough Blvd to Eucalyptus Ave	Local	1600	1	2	12.5	25	32	25	A, B
Forest View Ave									
Eucalyptus Ave to Sharon Ave	Local	1600	1	2	10	20	20	25	A, B
Sharon Ave to El Camino Real (City Limit)	Local	1600	1	2	12.5	25	55	25	A
Hayne Rd									
Skyline Blvd (City Limit) to Mosely Rd	Collector	7600	1	2	11	22	28	35	A, B
Mosely Rd to Sandra Rd	Collector	7600	1	2	10	20	25	25	A
Sandra Rd to Black Mountain Rd	Collector	7600	1	2	11	22	28	25	A
Hillsborough Blvd									
Sharon Ave / Floribunda Ave to Ralston Ave	Collector	7600	1	2	12	24	30	25	A
Ralston Ave to Barroilhet Ave	Collector	7600	1	2	11	22	30	25	A
Barroilhet Ave to Bromfield Rd	Collector	7600	1	2	11	22	20	25	A
Bromfield Rd to Edgewood Rd	Collector	7600	1	2	12	24	24	25	A
Ralston Ave									
El Camino Real (City Limit) to Crescent Ave	Collector	7600	1	2	17	34	54	25	A
Crescent Ave to Occidental Ave	Collector	7600	1	2	17	34	54	25	A, B
Occidental Ave to Hillsborough Blvd	Collector	7600	1	2	12	24	40	25	A
Hillsborough Blvd to Eucalyptus Ave	Collector	7600	1	2	12.5	25	36	25	A
Eucalyptus to Chateau	Collector	7600	1	2	12.5	25	40	25	A, B

SHEET 5: TRAFFIC NOISE MODEL (TNM) ROADWAY GEOMETRY INPUTS

Road/Segment	Class	Max Daily Volume (Vehicles)	Travel Lanes		Road Width (Feet)			Vehicle Speed (MPH)	Notes
			Each Direction	Total	Each Direction	Paved Area	ROW		
Sharon Ave									
Forest View Ave to Floribunda Ave / Hillsborough Blvd	Local	1600	1	2	12.5	25	30	25	A,B
Summit Dr									
Skyline Blvd to Bella Vista Dr	Local	1600	1	2	11	22	22	25	A
Bella Vista Dr to Oakdale Rd	Local	1600	1	2	13	26	31	25	A, B
Tartan Trail									
Black Mountain Rd to Crystal Springs Rd	Local	1600	1	2	12.5	25	32	25	A
Tournament Dr									
Sugar Hill Dr to Tobin Clark Dr	Local	1600	1	2	12.5	25	36	25	A, B
West Santa Inez Ave									
Hillsborough Blvd to Roblar Ave	Local	1600	1	2	12.5	25	30	25	A
Roblar Ave to El Camino Real	Local	1600	1	2	20	40	64	30	A
State Route 35 (Skyline Boulevard)									
Hayne Road to La Strada Ct (City Limit)	Minor Arterial	8800	1	2	18	36	45	45	A,B
State Route 82 (El Camino Real)									
Forest View Ave to Ralston Ave	Major Arterial	NA	2	4	20	40	40	35	A,B
State Route 92									
Alameda De Las Pulgas to De Anza Blvd	Freeway	NA	2	4	45	90	90	55	A,B
Interstate 280 (Northbound)									
Northern City Limit to Crystal Springs Rd	Freeway	NA	-	4	-	70	90	65	A,B
Interstate 280 (Southbound)									
Northern City Limit to Crystal Springs Rd	Freeway	NA	-	4	-	70	90	65	A,B

Notes

A. Road classification and maximum daily traffic volume from General Plan Circulation Element. Maximum traffic volume based on LOS C

B. Where vehicle speeds were not posted, vehicle speed is assumed to be 25 mph for local roads, 35 mph for collector roads, and 45 mph for arterial roads.

SHEET 6: 2020 EXISTING TRAFFIC NOISE CONTOURS

Road/Segment	Modeled Average Daily Traffic (ADT) Volume	Modeled CNEL 50 Feet from Road Centerline	Distance from Modeled Road Center to Noise Contour Level				Notes
			60 CNEL	65 CNEL	70 CNEL	75 CNEL	
Black Mountain Rd							
Wedgewood Dr to Hayne Rd	2,694	51.8	8	2	1	0	A,B
Hayne Rd/West Santa Inez Ave to West Santa Inez Ave	4,080	53.2	10	3	1	0	A,B
Chateau Dr							
Ralston Ave to Provident Dr	3,186	51.7	7	2	1	0	A,B
Provident Dr to Skyline Blvd (City Limit)	2,406	52.9	10	3	1	0	A,B
Crystal Springs Rd							
Polhemus Rd (City Limit) to Woodridge Rd	2,139	55.7	19	6	2	1	A,B
Woodridge Rd to Ridgeway Rd	4,098	61.0	63	20	6	2	A,B
Ridgeway Rd to Alameda De Las Pulgas	8,078	57.0	25	8	3	1	A,B
Alameda De Las Pulgas to Harvard Rd	2,332	49.9	5	2	0	0	A,B
Harvard Rd to 3rd Ave	2,332	49.9	5	2	0	0	A,B
3rd Ave to El Camino Real	1,445	47.1	3	1	0	0	A,B
El Cerrito Ave							
Brentwood Rd to Crystal Springs Rd	4,831	58.8	38	12	4	1	A,B
Floribunda Ave							
El Camino Real (City Limit) to Sharon Ave / Hillsborough Blvd	3,381	53.3	11	3	1	0	A,B
Sharon Ave/Hillsborough Blvd to Eucalyptus Ave	1,213	48.6	4	1	0	0	A,B
Forest View Ave							
Eucalyptus Ave to Sharon Ave	2,481	51.9	8	2	1	0	A,B
Sharon Ave to El Camino Real (City Limit)	2,481	51.8	8	2	1	0	A,B
Hayne Rd							
Skyline Blvd (City Limit) to Mosely Rd	10,177	61.9	77	24	8	2	A,B
Mosely Rd to Sandra Rd	7,528	55.7	19	6	2	1	A,B
Sandra Rd to Black Mountain Rd	4,080	53.2	10	3	1	0	A,B
Hillsborough Blvd							
Sharon Ave / Floribunda Ave to Ralston Ave	920	45.1	2	1	0	0	A,B
Ralston Ave to Barroilhet Ave	836	45.9	2	1	0	0	A,B
Barroilhet Ave to Bromfield Rd	908	46.1	2	1	0	0	A,B
Bromfield Rd to Edgewood Rd	111	38.6	0	0	0	0	A,B
Ralston Ave							
El Camino Real (City Limit) to Crescent Ave	3,041	53.0	10	3	1	0	A,B
Crescent Ave to Occidental Ave	4,781	54.2	13	4	1	0	A,B
Occidental Ave to Hillsborough Blvd	1,027	46.5	2	1	0	0	A,B
Hillsborough Blvd to Eucalyptus Ave	943	47.5	3	1	0	0	A,B
Eucalyptus to Chateau	3,186	52.6	9	3	1	0	A,B

SHEET 6: 2020 EXISTING TRAFFIC NOISE CONTOURS

Road/Segment	Modeled Average Daily Traffic (ADT) Volume	Modeled CNEL 50 Feet from Road Centerline	Distance from Modeled Road Center to Noise Contour Level				Notes
			60 CNEL	65 CNEL	70 CNEL	75 CNEL	
Sharon Ave							
Forest View Ave to Floribunda Ave / Hillsborough Blvd	1,492	46.8	2	1	0	0	A,B
Summit Dr							
Skyline Blvd to Bella Vista Dr	3,950	53.1	10	3	1	0	A,B
Bella Vista Dr to Oakdale Rd	3,074	51.5	7	2	1	0	A,B
Tartan Trail							
Black Mountain Rd to Crystal Springs Rd	1,959	51.3	7	2	1	0	A,B
Tournament Dr							
Sugar Hill Dr to Tobin Clark Dr	242	40.6	1	0	0	0	A,B
West Santa Inez Ave							
Hillsborough Blvd to Roblar Ave	4,301	53.1	10	3	1	0	A,B
Roblar Ave to El Camino Real	3,422	55.0	16	5	2	1	A,B
State Route 35 (Skyline Boulevard)							
Hayne Road to La Strada Ct (City Limit)	1,194	54.3	13	4	1	0	A,B
State Route 82 (El Camino Real)							
Forest View Ave to Ralston Ave	10,172	61.6	72	23	7	2	A,B
State Route 92							
Alameda De Las Pulgas to De Anza Blvd	28,503	69.3	851	269	85	27	A,B
Interstate 280 (Northbound)							
Northern City Limit to SR 35	74,478	75.9	3,890	1,230	389	123	A,B
Interstate 280 (Southbound)							
Northern City Limit to SR 35	86,354	76.9	4,898	1,549	490	155	A,B

Notes

A. ADT is average daily traffic volume. ADT is bi-directional for all road segments except I-280. Traffic volumes obtained from the travel demand modeling conducted for the Project.

B. CNEL is estimated at 50 feet from the road center for all road segments except SR 92 and I-280, which is estimated at 100 feet from the road center.

SHEET 7: 2020 EXISTING CONDITIONS TNM TRAFFIC VOLUME PERCENTAGES

Road/Segment	ADT	Time of Day Split			Daytime, Evening, Nighttime Fleet Mix			Notes
		Day (7 AM to 7 PM	Evening (7 PM to 10 PM)	Night (10 PM to 7 AM)	Auto	MHDT	HHDT	
Black Mountain Rd								
Wedgewood Dr to Hayne Rd	2,694	75.89%	4.64%	19.47%	100.00%	0.00%	0.00%	A
Hayne Rd/West Santa Inez Ave to West Santa Inez Ave	4,080	80.08%	2.60%	17.32%	99.89%	0.05%	0.06%	A
Chateau Dr								
Ralston Ave to Provident Dr	3,186	78.57%	4.23%	17.20%	99.73%	0.10%	0.17%	A
Provident Dr to Skyline Blvd (City Limit)	2,406	77.28%	4.35%	18.37%	99.78%	0.08%	0.14%	A
Crystal Springs Rd								
Polhemus Rd (City Limit) to Woodridge Rd	2,139	87.38%	4.16%	8.45%	99.96%	0.03%	0.02%	A
Woodridge Rd to Ridgeway Rd	4,098	80.91%	4.46%	14.64%	99.98%	0.01%	0.01%	A
Ridgeway Rd to Alameda De Las Pulgas	8,078	77.31%	4.71%	17.98%	99.96%	0.02%	0.02%	A
Alameda De Las Pulgas to Harvard Rd	2,332	88.07%	4.48%	7.45%	99.96%	0.02%	0.01%	A
Harvard Rd to 3rd Ave	2,332	88.06%	4.48%	7.46%	99.96%	0.02%	0.01%	A
3rd Ave to El Camino Real	1,445	90.01%	4.66%	5.33%	99.96%	0.03%	0.01%	A
El Cerrito Ave								
Brentwood Rd to Crystal Springs Rd	4,831	75.68%	4.82%	19.51%	99.95%	0.02%	0.03%	A
Floribunda Ave								
El Camino Real (City Limit) to Sharon Ave / Hillsborough Blvd	3,381	77.30%	3.36%	19.34%	99.92%	0.02%	0.05%	A
Sharon Ave/Hillsborough Blvd to Eucalyptus Ave	1,213	78.77%	3.97%	17.22%	99.96%	0.01%	0.02%	A
Forest View Ave								
Eucalyptus Ave to Sharon Ave	2,481	73.93%	5.38%	20.69%	99.98%	0.00%	0.01%	A
Sharon Ave to El Camino Real (City Limit)	2,481	76.26%	5.38%	18.37%	99.98%	0.00%	0.01%	A
Hayne Rd								
Skyline Blvd (City Limit) to Mosely Rd	10,177	78.67%	3.56%	17.77%	99.74%	0.09%	0.16%	A
Mosely Rd to Sandra Rd	7,528	81.22%	3.02%	15.76%	99.66%	0.13%	0.22%	A
Sandra Rd to Black Mountain Rd	4,080	80.08%	2.60%	17.32%	99.89%	0.05%	0.06%	A

SHEET 7: 2020 EXISTING CONDITIONS TNM TRAFFIC VOLUME PERCENTAGES

Road/Segment	ADT	Time of Day Split			Daytime, Evening, Nighttime Fleet Mix			Notes
		Day (7 AM to 7 PM	Evening (7 PM to 10 PM)	Night (10 PM to 7 AM)	Auto	MHDT	HHDT	
Hillsborough Blvd								
Sharon Ave / Floribunda Ave to Ralston Ave	920	94.15%	2.83%	3.01%	99.78%	0.07%	0.15%	A
Ralston Ave to Barroilhet Ave	836	85.90%	2.70%	9.98%	99.75%	0.08%	0.17%	A
Barroilhet Ave to Bromfield Rd	908	86.16%	2.82%	11.02%	99.77%	0.07%	0.15%	A
Bromfield Rd to Edgewood Rd	111	87.55%	4.24%	8.21%	100.00%	0.00%	0.00%	A
Ralston Ave								
El Camino Real (City Limit) to Crescent Ave	3,041	75.59%	5.36%	19.04%	99.88%	0.04%	0.08%	A
Crescent Ave to Occidental Ave	4,781	79.23%	4.87%	15.90%	99.91%	0.03%	0.06%	A
Occidental Ave to Hillsborough Blvd	1,027	85.23%	5.92%	8.85%	99.89%	0.06%	0.06%	A
Hillsborough Blvd to Eucalyptus Ave	943	78.39%	6.07%	15.54%	99.87%	0.06%	0.07%	A
Eucalyptus to Chateau	3,186	78.57%	4.23%	17.20%	99.73%	0.10%	0.17%	A
Sharon Ave								
Forest View Ave to Floribunda Ave / Hillsborough Blvd	1,492	46.06%	3.34%	8.61%	99.99%	0.00%	0.01%	A
Summit Dr								
Skyline Blvd to Bella Vista Dr	3,950	79.36%	4.01%	16.63%	99.80%	0.08%	0.12%	A
Bella Vista Dr to Oakdale Rd	3,074	79.83%	4.61%	15.57%	99.86%	0.06%	0.08%	A
Tartan Trail								
Black Mountain Rd to Crystal Springs Rd	1,959	73.83%	4.78%	21.39%	100.00%	0.00%	0.00%	A
Tournament Dr								
Sugar Hill Dr to Tobin Clark Dr	242	92.56%	2.17%	4.96%	100.00%	0.00%	0.01%	A
West Santa Inez Ave								
Hillsborough Blvd to Roblar Ave	4,301	80.48%	2.68%	16.84%	99.90%	0.05%	0.06%	A
Roblar Ave to El Camino Real	3,422	82.22%	2.26%	15.52%	99.88%	0.06%	0.07%	A
State Route 35 (Skyline Boulevard)								
Hayne Road to La Strada Ct (City Limit)	1,194	77.22%	2.92%	6.80%	99.85%	0.05%	0.10%	A

SHEET 7: 2020 EXISTING CONDITIONS TNM TRAFFIC VOLUME PERCENTAGES

Road/Segment	ADT	Time of Day Split			Daytime, Evening, Nighttime Fleet Mix			Notes
		Day (7 AM to 7 PM	Evening (7 PM to 10 PM)	Night (10 PM to 7 AM)	Auto	MHDT	HHDT	
State Route 82 (El Camino Real)								
Forest View Ave to Ralston Ave	10,172	84.43%	3.03%	12.54%	99.73%	0.12%	0.15%	A
State Route 92								
Alameda De Las Pulgas to De Anza Blvd	28,503	76.61%	3.94%	19.45%	99.19%	0.26%	0.56%	A
Interstate 280 (Northbound)								
Northern City Limit to Crystal Springs Rd	74,478	78.42%	4.29%	17.29%	98.56%	0.39%	1.05%	A
Interstate 280 (Southbound)								
Northern City Limit to Crystal Springs Rd	86,354	75.20%	3.30%	21.51%	98.74%	0.33%	0.93%	A
Notes								
A. Time of day and fleet percentages were obtained from the travel demand modeling conducted for the Project.								

SHEET 8: 2020 EXISTING CONDITIONS MODELED TRAFFIC VOLUMES

Road/Segment	ADT	Day (7 AM to 7 PM)				Evening (7 PM to 10 PM)				Nighttime (10 PM to 7 AM)				Notes
		Auto	MHDT	HHDT	Total	Auto	MHDT	HHDT	Total	Auto	MHDT	HHDT	Total	
Black Mountain Rd														
Wedgewood Dr to Hayne Rd	2,694	2,045	0	0	2,045	125	0	0	125	524	0	0	524	A
Hayne Rd/West Santa Inez Ave to West Santa Inez Ave	4,080	3,264	2	2	3,267	106	0	0	106	706	0	0	707	A
Chateau Dr														
Ralston Ave to Provident Dr	3,186	2,496	2	4	2,503	134	0	1	135	546	1	1	548	A
Provident Dr to Skyline Blvd (City Limit)	2,406	1,855	1	3	1,859	104	0	0	105	441	0	1	442	A
Crystal Springs Rd														
Polhemus Rd (City Limit) to Woodridge Rd	2,139	1,868	1	0	1,869	89	0	0	89	181	0	0	181	A
Woodridge Rd to Ridgeway Rd	4,098	3,315	0	0	3,315	183	0	0	183	600	0	0	600	A
Ridgeway Rd to Alameda De Las Pulgas	8,078	6,243	1	1	6,245	380	0	0	380	1,452	0	0	1,453	A
Alameda De Las Pulgas to Harvard Rd	2,332	2,053	0	0	2,054	104	0	0	105	174	0	0	174	A
Harvard Rd to 3rd Ave	2,332	2,053	0	0	2,054	104	0	0	105	174	0	0	174	A
3rd Ave to El Camino Real	1,445	1,300	0	0	1,301	67	0	0	67	77	0	0	77	A
El Cerrito Ave														
Brentwood Rd to Crystal Springs Rd	4,831	3,654	1	1	3,656	233	0	0	233	942	0	0	942	A
Floribunda Ave														
El Camino Real (City Limit) to Sharon Ave / Hillsborough Blvd	3,381	2,611	1	1	2,613	114	0	0	114	653	0	0	654	A
Sharon Ave/Hillsborough Blvd to Eucalyptus Ave	1,213	955	0	0	956	48	0	0	48	209	0	0	209	A

SHEET 8: 2020 EXISTING CONDITIONS MODELED TRAFFIC VOLUMES

Road/Segment	ADT	Day (7 AM to 7 PM)				Evening (7 PM to 10 PM)				Nighttime (10 PM to 7 AM)				Notes
		Auto	MHDT	HHDT	Total	Auto	MHDT	HHDT	Total	Auto	MHDT	HHDT	Total	
Forest View Ave														
Eucalyptus Ave to Sharon Ave	2,481	1,834	0	0	1,834	133	0	0	133	513	0	0	513	A
Sharon Ave to El Camino Real (City Limit)	2,481	1,892	0	0	1,892	133	0	0	133	456	0	0	456	A
Hayne Rd														
Skyline Blvd (City Limit) to Mosely Rd	10,177	7,986	8	13	8,007	362	0	1	363	1,803	2	3	1,808	A
Mosely Rd to Sandra Rd	7,528	6,094	8	13	6,115	226	0	0	227	1,182	2	3	1,186	A
Sandra Rd to Black Mountain Rd	4,080	3,264	2	2	3,267	106	0	0	106	706	0	0	707	A
Hillsborough Blvd														
Sharon Ave / Floribunda Ave to Ralston Ave	920	864	1	1	866	26	0	0	26	28	0	0	28	A
Ralston Ave to Barroilhet Ave	836	717	1	1	718	23	0	0	23	83	0	0	83	A
Barroilhet Ave to Bromfield Rd	908	781	1	1	783	26	0	0	26	100	0	0	100	A
Bromfield Rd to Edgewood Rd	111	97	0	0	97	5	0	0	5	9	0	0	9	A
Ralston Ave														
El Camino Real (City Limit) to Crescent Ave	3,041	2,296	1	2	2,298	163	0	0	163	578	0	0	579	A
Crescent Ave to Occidental Ave	4,781	3,785	1	2	3,788	233	0	0	233	760	0	0	760	A
Occidental Ave to Hillsborough Blvd	1,027	874	0	1	875	61	0	0	61	91	0	0	91	A
Hillsborough Blvd to Eucalyptus Ave	943	739	0	0	739	57	0	0	57	146	0	0	147	A
Eucalyptus to Chateau	3,186	2,496	2	4	2,503	134	0	0	135	546	1	1	548	A
Sharon Ave														
Forest View Ave to Floribunda Ave / Hillsborough Blvd	1,492	687	0	0	687	50	0	0	50	128	0	0	128	A

SHEET 8: 2020 EXISTING CONDITIONS MODELED TRAFFIC VOLUMES

Road/Segment	ADT	Day (7 AM to 7 PM)				Evening (7 PM to 10 PM)				Nighttime (10 PM to 7 AM)				Notes
		Auto	MHDT	HHDT	Total	Auto	MHDT	HHDT	Total	Auto	MHDT	HHDT	Total	
Summit Dr														
Skyline Blvd to Bella Vista Dr	3,950	3,129	3	4	3,135	158	0	0	158	656	1	1	657	A
Bella Vista Dr to Oakdale Rd	3,074	2,450	1	2	2,454	141	0	0	142	478	0	0	479	A
Tartan Trail														
Black Mountain Rd to Crystal Springs Rd	1,959	1,447	0	0	1,447	94	0	0	94	419	0	0	419	A
Tournament Dr														
Sugar Hill Dr to Tobin Clark Dr	242	224	0	0	224	5	0	0	5	12	0	0	12	A
West Santa Inez Ave														
Hillsborough Blvd to Roblar Ave	4,301	3,458	2	2	3,462	115	0	0	115	723	0	0	724	A
Roblar Ave to El Camino Real	3,422	2,810	2	2	2,814	77	0	0	77	530	0	0	531	A
State Route 35 (Skyline Boulevard)														
Hayne Road to La Strada Ct (City Limit)	1,194	921	0	1	922	35	0	0	35	81	0	0	81	A
State Route 82 (El Camino Real)														
Forest View Ave to Ralston Ave	10,172	8,565	10	13	8,588	307	0	0	308	1,272	2	2	1,276	A
State Route 92														
Alameda De Las Pulgas to De Anza Blvd	28,503	21,658	56	122	21,835	1,115	3	6	1,124	5,498	14	31	5,543	A
Interstate 280 (Northbound)														
Northern City Limit to Crystal Springs Road	74,478	57,567	227	614	58,408	3,150	12	34	3,196	12,689	50	135	12,875	A
Interstate 280 (Southbound)														
Northern City Limit to Crystal Springs Road	86,354	64,117	214	604	64,934	2,811	9	26	2,847	18,339	61	173	18,573	A
Notes														
A. Traffic volumes obtained from the travel demand modeling conducted for the Project.														

SHEET 9: 2020 PLUS PROJECT TRAFFIC NOISE CONTOURS

Road/Segment	Modeled Average Daily Traffic (ADT) Volume	Modeled CNEL 50 Feet from Road Centerline	Distance from Modeled Road Center to Noise Contour Level				Notes
			60 CNEL	65 CNEL	70 CNEL	75 CNEL	
Black Mountain Rd							
Wedgewood Dr to Hayne Rd	2,957	52.2	8	3	1	0	A,B
Hayne Rd/West Santa Inez Ave to West Santa Inez Ave	4,063	53.2	10	3	1	0	A,B
Chateau Dr							
Ralston Ave to Provident Dr	3,534	52.2	8	3	1	0	A,B
Provident Dr to Skyline Blvd (City Limit)	2,645	53.3	11	3	1	0	A,B
Crystal Springs Rd							
Polhemus Rd (City Limit) to Woodridge Rd	2,149	55.7	19	6	2	1	A,B
Woodridge Rd to Ridgeway Rd	4,302	61.2	66	21	7	2	A,B
Ridgeway Rd to Alameda De Las Pulgas	8,581	57.3	27	8	3	1	A,B
Alameda De Las Pulgas to Harvard Rd	2,402	50.0	5	2	1	0	A,B
Harvard Rd to 3rd Ave	2,402	50.0	5	2	1	0	A,B
3rd Ave to El Camino Real	1,485	47.2	3	1	0	0	A,B
El Cerrito Ave							
Brentwood Rd to Crystal Springs Rd	5,189	59.1	41	13	4	1	A,B
Floribunda Ave							
El Camino Real (City Limit) to Sharon Ave / Hillsborough Blvd	3,667	53.7	12	4	1	0	A,B
Sharon Ave/Hillsborough Blvd to Eucalyptus Ave	1,334	49.0	4	1	0	0	A,B
Forest View Ave							
Eucalyptus Ave to Sharon Ave	2,738	52.3	9	3	1	0	A,B
Sharon Ave to El Camino Real (City Limit)	2,738	52.2	8	3	1	0	A,B
Hayne Rd							
Skyline Blvd (City Limit) to Mosely Rd	10,449	62.0	80	25	8	3	A,B
Mosely Rd to Sandra Rd	7,545	55.7	19	6	2	1	A,B
Sandra Rd to Black Mountain Rd	4,063	53.2	10	3	1	0	A,B
Hillsborough Blvd							
Sharon Ave / Floribunda Ave to Ralston Ave	950	45.2	2	1	0	0	A,B
Ralston Ave to Barroilhet Ave	859	46.0	2	1	0	0	A,B
Barroilhet Ave to Bromfield Rd	943	46.3	2	1	0	0	A,B
Bromfield Rd to Edgewood Rd	128	39.3	0	0	0	0	A,B
Ralston Ave							
El Camino Real (City Limit) to Crescent Ave	3,104	53.1	10	3	1	0	A,B
Crescent Ave to Occidental Ave	4,844	54.3	13	4	1	0	A,B
Occidental Ave to Hillsborough Blvd	1,149	47.0	2	1	0	0	A,B
Hillsborough Blvd to Eucalyptus Ave	1,058	48.0	3	1	0	0	A,B
Eucalyptus to Chateau	3,534	53.1	10	3	1	0	A,B

SHEET 9: 2020 PLUS PROJECT TRAFFIC NOISE CONTOURS

Road/Segment	Modeled Average Daily Traffic (ADT) Volume	Modeled CNEL 50 Feet from Road Centerline	Distance from Modeled Road Center to Noise Contour Level				Notes
			60 CNEL	65 CNEL	70 CNEL	75 CNEL	
Sharon Ave							
Forest View Ave to Floribunda Ave / Hillsborough Blvd	1,653	47.2	3	1	0	0	A,B
Summit Dr							
Skyline Blvd to Bella Vista Dr	4,278	53.4	11	3	1	0	A,B
Bella Vista Dr to Oakdale Rd	3,226	51.7	7	2	1	0	A,B
Tartan Trail							
Black Mountain Rd to Crystal Springs Rd	1,671	50.6	6	2	1	0	A,B
Tournament Dr							
Sugar Hill Dr to Tobin Clark Dr	293	41.4	1	0	0	0	A,B
West Santa Inez Ave							
Hillsborough Blvd to Roblar Ave	4,320	53.1	10	3	1	0	A,B
Roblar Ave to El Camino Real	3,375	54.9	16	5	2	0	A,B
State Route 35 (Skyline Boulevard)							
Hayne Road to La Strada Ct (City Limit)	1,252	54.5	14	4	1	0	A,B
State Route 82 (El Camino Real)							
Forest View Ave to Ralston Ave	10,147	61.6	72	23	7	2	A,B
State Route 92							
Alameda De Las Pulgas to De Anza Blvd	28,427	69.3	849	268	85	27	A,B
Interstate 280 (Northbound)							
Northern City Limit to SR 35	74,371	75.9	3,885	1,228	388	123	A,B
Interstate 280 (Southbound)							
Northern City Limit to SR 35	86,231	76.9	4,891	1,547	489	155	A,B

Notes

A. ADT is average daily traffic volume. ADT is bi-directional for all road segments except I-280. Traffic volumes obtained from the travel demand modeling conducted for the Project.

B. CNEL is estimated at 50 feet from the road center for all road segments except SR 92 and I-280, which is estimated at 100 feet from the road center.

SHEET 10: 2020 PLUS PROJECT TNM TRAFFIC VOLUME PERCENTAGES

Road/Segment	ADT	Time of Day Split			Daytime, Evening, Nighttime Fleet Mix			Notes
		Day (7 AM to 7 PM	Evening (7 PM to 10 PM)	Night (10 PM to 7 AM)	Auto	MHDT	HHDT	
Black Mountain Rd								
Wedgewood Dr to Hayne Rd	2,957	75.77%	4.68%	19.56%	100.00%	0.00%	0.00%	A
Hayne Rd/West Santa Inez Ave to West Santa Inez Ave	4,063	80.17%	2.67%	17.16%	99.90%	0.05%	0.06%	A
Chateau Dr								
Ralston Ave to Provident Dr	3,534	78.26%	4.28%	17.46%	99.76%	0.09%	0.15%	A
Provident Dr to Skyline Blvd (City Limit)	2,645	77.06%	4.41%	18.53%	99.80%	0.07%	0.13%	A
Crystal Springs Rd								
Polhemus Rd (City Limit) to Woodridge Rd	2,149	86.86%	4.17%	8.97%	99.96%	0.03%	0.02%	A
Woodridge Rd to Ridgeway Rd	4,302	80.10%	4.49%	15.41%	99.98%	0.01%	0.01%	A
Ridgeway Rd to Alameda De Las Pulgas	8,581	76.76%	4.73%	18.51%	99.96%	0.02%	0.02%	A
Alameda De Las Pulgas to Harvard Rd	2,402	87.78%	4.49%	7.73%	99.97%	0.02%	0.01%	A
Harvard Rd to 3rd Ave	2,402	87.82%	4.49%	7.69%	99.97%	0.02%	0.01%	A
3rd Ave to El Camino Real	1,485	90.01%	4.66%	5.33%	99.96%	0.03%	0.01%	A
El Cerrito Ave								
Brentwood Rd to Crystal Springs Rd	5,189	75.65%	4.82%	19.53%	99.96%	0.02%	0.03%	A
Floribunda Ave								
El Camino Real (City Limit) to Sharon Ave / Hillsborough Blvd	3,667	76.91%	3.37%	19.71%	99.93%	0.02%	0.05%	A
Sharon Ave/Hillsborough Blvd to Eucalyptus Ave	1,334	78.87%	3.98%	17.17%	99.97%	0.01%	0.02%	A
Forest View Ave								
Eucalyptus Ave to Sharon Ave	2,738	73.94%	5.40%	20.66%	99.98%	0.00%	0.01%	A
Sharon Ave to El Camino Real (City Limit)	2,738	75.94%	5.40%	18.65%	99.98%	0.00%	0.01%	A
Hayne Rd								
Skyline Blvd (City Limit) to Mosely Rd	10,449	78.18%	3.62%	18.20%	99.75%	0.09%	0.16%	A
Mosely Rd to Sandra Rd	7,545	81.02%	3.05%	15.92%	99.66%	0.12%	0.22%	A
Sandra Rd to Black Mountain Rd	4,063	80.17%	2.67%	17.16%	99.90%	0.05%	0.06%	A

SHEET 10: 2020 PLUS PROJECT TNM TRAFFIC VOLUME PERCENTAGES

Road/Segment	ADT	Time of Day Split			Daytime, Evening, Nighttime Fleet Mix			Notes
		Day (7 AM to 7 PM	Evening (7 PM to 10 PM)	Night (10 PM to 7 AM)	Auto	MHDT	HHDT	
Hillsborough Blvd								
Sharon Ave / Floribunda Ave to Ralston Ave	950	93.08%	2.84%	4.08%	99.78%	0.07%	0.14%	A
Ralston Ave to Barroilhet Ave	859	84.01%	2.70%	11.84%	99.76%	0.08%	0.16%	A
Barroilhet Ave to Bromfield Rd	943	84.65%	2.84%	12.51%	99.78%	0.07%	0.14%	A
Bromfield Rd to Edgewood Rd	128	84.60%	4.37%	11.03%	100.00%	0.00%	0.00%	A
Ralston Ave								
El Camino Real (City Limit) to Crescent Ave	3,104	75.85%	5.43%	18.72%	99.89%	0.04%	0.08%	A
Crescent Ave to Occidental Ave	4,844	79.14%	4.92%	15.94%	99.91%	0.03%	0.06%	A
Occidental Ave to Hillsborough Blvd	1,149	84.35%	5.93%	9.73%	99.90%	0.05%	0.05%	A
Hillsborough Blvd to Eucalyptus Ave	1,058	77.42%	6.07%	16.51%	99.89%	0.06%	0.06%	A
Eucalyptus to Chateau	3,534	78.26%	4.28%	17.46%	99.76%	0.09%	0.15%	A
Sharon Ave								
Forest View Ave to Floribunda Ave / Hillsborough Blvd	1,653	45.49%	3.34%	9.89%	99.99%	0.00%	0.01%	A
Summit Dr								
Skyline Blvd to Bella Vista Dr	4,278	79.02%	4.10%	16.88%	99.82%	0.07%	0.11%	A
Bella Vista Dr to Oakdale Rd	3,226	79.33%	4.63%	16.04%	99.87%	0.05%	0.08%	A
Tartan Trail								
Black Mountain Rd to Crystal Springs Rd	1,671	82.53%	3.17%	14.30%	100.00%	0.00%	0.00%	A
Tournament Dr								
Sugar Hill Dr to Tobin Clark Dr	293	92.34%	2.29%	5.45%	100.00%	0.00%	0.00%	A
West Santa Inez Ave								
Hillsborough Blvd to Roblar Ave	4,320	80.47%	2.77%	16.76%	99.90%	0.04%	0.05%	A
Roblar Ave to El Camino Real	3,375	82.69%	2.32%	14.99%	99.88%	0.05%	0.07%	A
State Route 35 (Skyline Boulevard)								
Hayne Road to La Strada Ct (City Limit)	1,252	73.97%	3.06%	7.14%	99.86%	0.00%	0.09%	A
State Route 82 (El Camino Real)								
Forest View Ave to Ralston Ave	10,147	84.15%	3.05%	12.80%	99.73%	0.12%	0.15%	A

SHEET 10: 2020 PLUS PROJECT TNM TRAFFIC VOLUME PERCENTAGES

Road/Segment	ADT	Time of Day Split			Daytime, Evening, Nighttime Fleet Mix			Notes
		Day (7 AM to 7 PM	Evening (7 PM to 10 PM)	Night (10 PM to 7 AM)	Auto	MHDT	HHDT	
State Route 92								
Alameda De Las Pulgas to De Anza Blvd	28,427	76.55%	3.96%	19.49%	99.19%	0.00%	0.56%	A
Interstate 280 (Northbound)								
Northern City Limit to Crystal Springs Rd	74,371	78.35%	4.31%	17.34%	98.56%	0.40%	1.05%	A
Interstate 280 (Southbound)								
Northern City Limit to Crystal Springs Rd	86,231	75.17%	3.31%	21.52%	98.74%	0.33%	0.93%	A
Notes								
A. Time of day and fleet percentages were obtained from the travel demand modeling conducted for the Project.								

SHEET 11: 2020 PLUS PROJECT MODELED TRAFFIC VOLUMES

Road/Segment	ADT	Day (7 AM to 7 PM)				Evening (7 PM to 10 PM)				Nighttime (10 PM to 7 AM)				Notes
		Auto	MHDT	HHDT	Total	Auto	MHDT	HHDT	Total	Auto	MHDT	HHDT	Total	
Black Mountain Rd														
Wedgewood Dr to Hayne Rd	2,957	2,240	0	0	2,240	138	0	0	138	578	0	0	578	A
Hayne Rd/West Santa Inez Ave to West Santa Inez Ave	4,063	3,254	2	2	3,257	108	0	0	108	696	0	0	697	A
Chateau Dr														
Ralston Ave to Provident Dr	3,534	2,760	2	4	2,766	151	0	1	151	616	1	1	617	A
Provident Dr to Skyline Blvd (City Limit)	2,645	2,034	1	3	2,038	116	0	0	117	489	0	1	490	A
Crystal Springs Rd														
Polhemus Rd (City Limit) to Woodridge Rd	2,149	1,866	1	0	1,866	89	0	0	90	193	0	0	193	A
Woodridge Rd to Ridgeway Rd	4,302	3,445	0	0	3,446	193	0	0	193	663	0	0	663	A
Ridgeway Rd to Alameda De Las Pulgas	8,581	6,584	1	1	6,586	405	0	0	406	1,588	0	0	1,589	A
Alameda De Las Pulgas to Harvard Rd	2,402	2,107	0	0	2,108	108	0	0	108	186	0	0	186	A
Harvard Rd to 3rd Ave	2,402	2,108	0	0	2,109	108	0	0	108	185	0	0	185	A
3rd Ave to El Camino Real	1,485	1,336	0	0	1,337	69	0	0	69	79	0	0	79	A
El Cerrito Ave														
Brentwood Rd to Crystal Springs Rd	5,189	3,924	1	1	3,926	250	0	0	250	1,013	0	0	1,013	A
Floribunda Ave														
El Camino Real (City Limit) to Sharon Ave / Hillsborough Blvd	3,667	2,818	1	1	2,820	124	0	0	124	722	0	0	723	A
Sharon Ave/Hillsborough Blvd to Eucalyptus Ave	1,334	1,052	0	0	1,052	53	0	0	53	229	0	0	229	A
Forest View Ave														
Eucalyptus to Sharon Ave	2,738	2,024	0	0	2,024	148	0	0	148	566	0	0	566	A
Sharon Ave to El Camino Real (City Limit)	2,738	2,079	0	0	2,079	148	0	0	148	511	0	0	511	A

SHEET 11: 2020 PLUS PROJECT MODELED TRAFFIC VOLUMES

Road/Segment	ADT	Day (7 AM to 7 PM)				Evening (7 PM to 10 PM)				Nighttime (10 PM to 7 AM)				Notes
		Auto	MHDT	HHDT	Total	Auto	MHDT	HHDT	Total	Auto	MHDT	HHDT	Total	
Hayne Rd														
Skyline Blvd (City Limit) to Mosely Rd	10,449	8,148	7	13	8,169	377	0	1	378	1,897	2	3	1,902	A
Mosely Rd to Sandra Rd	7,545	6,092	8	13	6,113	230	0	0	230	1,197	2	3	1,201	A
Sandra Rd to Black Mountain Rd	4,063	3,254	2	2	3,257	108	0	0	108	696	0	0	697	A
Hillsborough Blvd														
Sharon Ave / Floribunda Ave to Ralston Ave	950	882	1	1	884	27	0	0	27	39	0	0	39	A
Ralston Ave to Barroilhet Ave	859	720	1	1	722	23	0	0	23	101	0	0	102	A
Barroilhet Ave to Bromfield Rd	943	797	1	1	798	27	0	0	27	118	0	0	118	A
Bromfield Rd to Edgewood Rd	128	109	0	0	109	6	0	0	6	14	0	0	14	A
Ralston Ave														
El Camino Real (City Limit) to Crescent Ave	3,104	2,352	1	2	2,355	168	0	0	169	580	0	0	581	A
Crescent Ave to Occidental Ave	4,844	3,830	1	2	3,834	238	0	0	238	772	0	0	772	A
Occidental Ave to Hillsborough Blvd	1,149	968	0	1	969	68	0	0	68	112	0	0	112	A
Hillsborough Blvd to Eucalyptus Ave	1,058	819	0	0	819	64	0	0	64	175	0	0	175	A
Eucalyptus to Chateau	3,534	2,760	2	4	2,766	151	0	0	151	616	1	1	617	A
Sharon Ave														
Forest View Ave to Floribunda Ave / Hillsborough Blvd	1,653	752	0	0	752	55	0	0	55	164	0	0	164	A
Summit Dr														
Skyline Blvd to Bella Vista Dr	4,278	3,375	2	4	3,381	175	0	0	175	721	1	1	722	A
Bella Vista Dr to Oakdale Rd	3,226	2,556	1	2	2,560	149	0	0	149	517	0	0	517	A
Tartan Trail														
Black Mountain Rd to Crystal Springs Rd	1,671	1,379	0	0	1,379	53	0	0	53	239	0	0	239	A
Tournament Dr														
Sugar Hill Dr to Tobin Clark Dr	293	271	0	0	271	7	0	0	7	16	0	0	16	A

SHEET 11: 2020 PLUS PROJECT MODELED TRAFFIC VOLUMES

Road/Segment	ADT	Day (7 AM to 7 PM)				Evening (7 PM to 10 PM)				Nighttime (10 PM to 7 AM)				Notes
		Auto	MHDT	HHDT	Total	Auto	MHDT	HHDT	Total	Auto	MHDT	HHDT	Total	
West Santa Inez Ave														
Hillsborough Blvd to Roblar Ave	4,320	3,473	2	2	3,476	119	0	0	120	723	0	0	724	A
Roblar Ave to El Camino Real	3,375	2,787	1	2	2,791	78	0	0	78	505	0	0	506	A
State Route 35 (Skyline Boulevard)														
Hayne Road to La Strada Ct (City Limit)	1,252	924	0	1	926	38	0	0	38	89	0	0	89	A
State Route 82 (El Camino Real)														
Forest View Ave to Ralston Ave	10,147	8,515	10	13	8,538	309	0	0	310	1,295	2	2	1,299	A
State Route 92														
Alameda De Las Pulgas to De Anza Blvd	28,427	21,584	0	121	21,762	1,116	0	6	1,126	5,495	0	31	5,540	A
Interstate 280 (Northbound)														
Northern City Limit to Crystal Springs Road	74,371	57,432	232	613	58,272	3,157	13	34	3,203	12,710	51	136	12,896	A
Interstate 280 (Southbound)														
Northern City Limit to Crystal Springs Road	86,231	64,004	217	602	64,819	2,820	10	27	2,856	18,323	62	172	18,556	A
Notes														
A. Traffic volumes obtained from the travel demand modeling conducted for the Project.														

SHEET 12: 2040 WITHOUT PROJECT TRAFFIC NOISE CONTOURS

Road/Segment	Modeled Average Daily Traffic (ADT) Volume	Modeled CNEL 50 Feet from Road Centerline	Distance from Modeled Road Center to Noise Contour Level				Notes
			60 CNEL	65 CNEL	70 CNEL	75 CNEL	
Black Mountain Rd							
Wedgewood Dr to Hayne Rd	2,622	51.7	7	2	1	0	A,B
Hayne Rd/West Santa Inez Ave to West Santa Inez Ave	3,957	53.1	10	3	1	0	A,B
Chateau Dr							
Ralston Ave to Provident Dr	3,119	51.6	7	2	1	0	A,B
Provident Dr to Skyline Blvd (City Limit)	2,646	53.3	11	3	1	0	A,B
Crystal Springs Rd							
Polhemus Rd (City Limit) to Woodridge Rd	3,193	57.4	28	9	3	1	A,B
Woodridge Rd to Ridgeway Rd	4,925	61.8	76	24	8	2	A,B
Ridgeway Rd to Alameda De Las Pulgas	8,714	57.3	27	9	3	1	A,B
Alameda De Las Pulgas to Harvard Rd	3,475	51.6	7	2	1	0	A,B
Harvard Rd to 3rd Ave	3,475	51.6	7	2	1	0	A,B
3rd Ave to El Camino Real	1,884	48.3	3	1	0	0	A,B
El Cerrito Ave							
Brentwood Rd to Crystal Springs Rd	5,515	59.4	43	14	4	1	A,B
Floribunda Ave							
El Camino Real (City Limit) to Sharon Ave / Hillsborough Blvd	4,091	54.1	13	4	1	0	A,B
Sharon Ave/Hillsborough Blvd to Eucalyptus Ave	1,304	48.9	4	1	0	0	A,B
Forest View Ave							
Eucalyptus Ave to Sharon Ave	2,202	51.4	7	2	1	0	A,B
Sharon Ave to El Camino Real (City Limit)	2,604	52.0	8	3	1	0	A,B
Hayne Rd							
Skyline Blvd (City Limit) to Mosely Rd	11,166	62.3	85	27	8	3	A,B
Mosely Rd to Sandra Rd	8,680	56.3	21	7	2	1	A,B
Sandra Rd to Black Mountain Rd	3,957	53.1	10	3	1	0	A,B
Hillsborough Blvd							
Sharon Ave / Floribunda Ave to Ralston Ave	1,745	47.9	3	1	0	0	A,B
Ralston Ave to Barroilhet Ave	1,660	48.9	4	1	0	0	A,B
Barroilhet Ave to Bromfield Rd	1,731	48.9	4	1	0	0	A,B
Bromfield Rd to Edgewood Rd	110	38.6	0	0	0	0	A,B
Ralston Ave							
El Camino Real (City Limit) to Crescent Ave	3,191	53.2	10	3	1	0	A,B
Crescent Ave to Occidental Ave	5,665	54.9	16	5	2	0	A,B
Occidental Ave to Hillsborough Blvd	928	46.1	2	1	0	0	A,B
Hillsborough Blvd to Eucalyptus Ave	844	47.0	3	1	0	0	A,B
Eucalyptus to Chateau	3,119	52.5	9	3	1	0	A,B

SHEET 12: 2040 WITHOUT PROJECT TRAFFIC NOISE CONTOURS

Road/Segment	Modeled Average Daily Traffic (ADT) Volume	Modeled CNEL 50 Feet from Road Centerline	Distance from Modeled Road Center to Noise Contour Level				Notes
			60 CNEL	65 CNEL	70 CNEL	75 CNEL	
Sharon Ave							
Forest View Ave to Floribunda Ave / Hillsborough Blvd	2,493	49.0	4	1	0	0	A,B
Summit Dr							
Skyline Blvd to Bella Vista Dr	3,951	53.1	10	3	1	0	A,B
Bella Vista Dr to Oakdale Rd	3,086	51.5	7	2	1	0	A,B
Tartan Trail							
Black Mountain Rd to Crystal Springs Rd	1,732	50.8	6	2	1	0	A,B
Tournament Dr							
Sugar Hill Dr to Tobin Clark Dr	366	42.4	1	0	0	0	A,B
West Santa Inez Ave							
Hillsborough Blvd to Roblar Ave	4,177	53.0	10	3	1	0	A,B
Roblar Ave to El Camino Real	3,323	54.9	15	5	2	0	A,B
State Route 35 (Skyline Boulevard)							
Hayne Road to La Strada Ct (City Limit)	1,980	56.5	22	7	2	1	A,B
State Route 82 (El Camino Real)							
Forest View Ave to Ralston Ave	15,215	63.3	108	34	11	3	A,B
State Route 92							
Alameda De Las Pulgas to De Anza Blvd	34,145	70.1	1,020	322	102	32	A,B
Interstate 280 (Northbound)							
Northern City Limit to SR 35	95,905	77.0	5,010	1,584	501	158	A,B
Interstate 280 (Southbound)							
Northern City Limit to SR 35	100,369	77.6	5,693	1,800	569	180	A,B

Notes

A. ADT is average daily traffic volume. ADT is bi-directional for all road segments except I-280. Traffic volumes obtained from the travel demand modeling conducted for the Project.

B. CNEL is estimated at 50 feet from the road center for all road segments except SR 92 and I-280, which is estimated at 100 feet from the road center.

SHEET 13: 2040 WITHOUT PROJECT TNM TRAFFIC VOLUME PERCENTAGES

Road/Segment	ADT	Time of Day Split			Daytime, Evening, Nighttime Fleet Mix			Notes
		Day (7 AM to 7 PM	Evening (7 PM to 10 PM)	Night (10 PM to 7 AM)	Auto	MHDT	HHDT	
Black Mountain Rd								
Wedgewood Dr to Hayne Rd	2,622	74.95%	4.81%	20.24%	100.00%	0.00%	0.00%	A
Hayne Rd/West Santa Inez Ave to West Santa Inez Ave	3,957	84.16%	2.82%	13.03%	99.86%	0.06%	0.08%	A
Chateau Dr								
Ralston Ave to Provident Dr	3,119	80.93%	4.36%	14.71%	99.74%	0.09%	0.17%	A
Provident Dr to Skyline Blvd (City Limit)	2,646	82.95%	3.91%	13.14%	99.79%	0.08%	0.13%	A
Crystal Springs Rd								
Polhemus Rd (City Limit) to Woodridge Rd	3,193	93.17%	3.52%	3.31%	99.92%	0.05%	0.04%	A
Woodridge Rd to Ridgeway Rd	4,925	86.30%	4.09%	9.61%	99.95%	0.03%	0.02%	A
Ridgeway Rd to Alameda De Las Pulgas	8,714	80.01%	4.63%	15.36%	99.90%	0.04%	0.06%	A
Alameda De Las Pulgas to Harvard Rd	3,475	100.54%	3.85%	-4.39%	99.92%	0.04%	0.03%	A
Harvard Rd to 3rd Ave	3,475	100.69%	3.85%	-4.54%	99.92%	0.04%	0.03%	A
3rd Ave to El Camino Real	1,884	100.33%	4.13%	-4.46%	99.91%	0.05%	0.04%	A
El Cerrito Ave								
Brentwood Rd to Crystal Springs Rd	5,515	76.16%	4.78%	19.06%	99.88%	0.04%	0.08%	A
Floribunda Ave								
El Camino Real (City Limit) to Sharon Ave / Hillsborough Blvd	4,091	76.83%	3.78%	19.40%	99.85%	0.05%	0.11%	A
Sharon Ave/Hillsborough Blvd to Eucalyptus Ave	1,304	79.04%	4.15%	20.40%	99.96%	0.01%	0.02%	A
Forest View Ave								
Eucalyptus Ave to Sharon Ave	2,202	75.11%	4.88%	20.02%	99.99%	0.00%	0.01%	A
Sharon Ave to El Camino Real (City Limit)	2,604	85.91%	4.13%	9.96%	99.76%	0.07%	0.17%	A
Hayne Rd								
Skyline Blvd (City Limit) to Mosely Rd	11,166	81.41%	3.56%	15.03%	99.65%	0.12%	0.23%	A
Mosely Rd to Sandra Rd	8,680	84.69%	3.00%	12.30%	99.55%	0.16%	0.29%	A
Sandra Rd to Black Mountain Rd	3,957	84.16%	2.82%	13.03%	99.86%	0.06%	0.08%	A

SHEET 13: 2040 WITHOUT PROJECT TNM TRAFFIC VOLUME PERCENTAGES

Road/Segment	ADT	Time of Day Split			Daytime, Evening, Nighttime Fleet Mix			Notes
		Day (7 AM to 7 PM	Evening (7 PM to 10 PM)	Night (10 PM to 7 AM)	Auto	MHDT	HHDT	
Hillsborough Blvd								
Sharon Ave / Floribunda Ave to Ralston Ave	1,745	95.21%	2.16%	2.63%	99.34%	0.20%	0.46%	A
Ralston Ave to Barroilhet Ave	1,660	92.55%	2.06%	5.36%	99.31%	0.21%	0.48%	A
Barroilhet Ave to Bromfield Rd	1,731	91.68%	2.16%	6.16%	99.34%	0.20%	0.46%	A
Bromfield Rd to Edgewood Rd	110	90.37%	4.29%	5.33%	100.00%	0.00%	0.00%	A
Ralston Ave								
El Camino Real (City Limit) to Crescent Ave	3,191	76.46%	4.91%	18.63%	99.89%	0.04%	0.07%	A
Crescent Ave to Occidental Ave	5,665	77.08%	4.68%	18.25%	99.92%	0.03%	0.05%	A
Occidental Ave to Hillsborough Blvd	928	92.95%	4.60%	2.45%	99.93%	0.04%	0.04%	A
Hillsborough Blvd to Eucalyptus Ave	844	86.03%	4.66%	9.31%	99.92%	0.04%	0.04%	A
Eucalyptus to Chateau	3,119	80.93%	4.36%	14.71%	99.74%	0.09%	0.17%	A
Sharon Ave								
Forest View Ave to Floribunda Ave / Hillsborough Blvd	2,493	50.36%	2.92%	-1.95%	99.52%	0.15%	0.34%	A
Summit Dr								
Skyline Blvd to Bella Vista Dr	3,951	80.17%	3.99%	15.84%	99.76%	0.09%	0.15%	A
Bella Vista Dr to Oakdale Rd	3,086	85.46%	4.54%	10.00%	99.88%	0.05%	0.07%	A
Tartan Trail								
Black Mountain Rd to Crystal Springs Rd	1,732	73.63%	5.15%	21.22%	100.00%	0.00%	0.00%	A
Tournament Dr								
Sugar Hill Dr to Tobin Clark Dr	366	94.15%	1.77%	4.09%	100.00%	0.00%	0.00%	A
West Santa Inez Ave								
Hillsborough Blvd to Roblar Ave	4,177	84.48%	2.90%	12.62%	99.86%	0.06%	0.07%	A
Roblar Ave to El Camino Real	3,323	84.48%	2.90%	12.62%	99.86%	0.06%	0.07%	A
State Route 35 (Skyline Boulevard)								
Hayne Road to La Strada Ct (City Limit)	1,980	61.38%	2.10%	4.90%	99.77%	0.07%	0.16%	A
State Route 82 (El Camino Real)								
Forest View Ave to Ralston Ave	15,215	80.45%	3.07%	16.48%	99.68%	0.14%	0.18%	A

SHEET 13: 2040 WITHOUT PROJECT TNM TRAFFIC VOLUME PERCENTAGES

Road/Segment	ADT	Time of Day Split			Daytime, Evening, Nighttime Fleet Mix			Notes
		Day (7 AM to 7 PM	Evening (7 PM to 10 PM)	Night (10 PM to 7 AM)	Auto	MHDT	HHDT	
State Route 92								
Alameda De Las Pulgas to De Anza Blvd	34,145	76.29%	3.95%	19.76%	99.17%	0.24%	0.59%	A
Interstate 280 (Northbound)								
Northern City Limit to Crystal Springs Rd	95,905	74.99%	4.10%	20.91%	98.36%	0.43%	1.21%	A
Interstate 280 (Southbound)								
Northern City Limit to Crystal Springs Rd	100,369	76.48%	3.42%	20.10%	98.53%	0.39%	1.08%	A
Notes								
A. Time of day and fleet percentages were obtained from the travel demand modeling conducted for the Project.								

SHEET 14: 2040 WITHOUT PROJECT MODELED TRAFFIC VOLUMES

Road/Segment	ADT	Day (7 AM to 7 PM)				Evening (7 PM to 10 PM)				Nighttime (10 PM to 7 AM)				Notes
		Auto	MHDT	HHDT	Total	Auto	MHDT	HHDT	Total	Auto	MHDT	HHDT	Total	
Black Mountain Rd														
Wedgewood Dr to Hayne Rd	2,622	1,965	0	0	1,965	126	0	0	126	531	0	0	531	A
Hayne Rd/West Santa Inez Ave to West Santa Inez Ave	3,957	3,326	2	3	3,330	111	0	0	112	515	0	0	516	A
Chateau Dr														
Ralston Ave to Provident Dr	3,119	2,518	2	4	2,524	136	0	1	136	458	0	1	459	A
Provident Dr to Skyline Blvd (City Limit)	2,646	2,190	2	3	2,195	103	0	0	103	347	0	0	348	A
Crystal Springs Rd														
Polhemus Rd (City Limit) to Woodridge Rd	3,193	2,973	1	1	2,975	112	0	0	112	106	0	0	106	A
Woodridge Rd to Ridgeway Rd	4,925	4,248	1	1	4,251	201	0	0	202	473	0	0	473	A
Ridgeway Rd to Alameda De Las Pulgas	8,714	6,965	3	4	6,972	403	0	0	404	1,337	1	1	1,338	A
Alameda De Las Pulgas to Harvard Rd	3,475	3,491	2	1	3,494	134	0	0	134	-152	0	0	-152	A
Harvard Rd to 3rd Ave	3,475	3,496	2	1	3,499	134	0	0	134	-158	0	0	-158	A
3rd Ave to El Camino Real	1,884	1,888	1	1	1,890	78	0	0	78	-84	0	0	-84	A
El Cerrito Ave														
Brentwood Rd to Crystal Springs Rd	5,515	4,195	2	3	4,200	263	0	0	264	1,050	0	1	1,051	A
Floribunda Ave														
El Camino Real (City Limit) to Sharon Ave / Hillsborough Blvd	4,091	3,138	1	3	3,143	154	0	0	154	792	0	1	793	A
Sharon Ave/Hillsborough Blvd to Eucalyptus Ave	1,304	1,030	0	0	1,031	54	0	0	54	266	0	0	266	A
Forest View Ave														
Eucalyptus Ave to Sharon Ave	2,202	1,654	0	0	1,654	107	0	0	107	441	0	0	441	A
Sharon Ave to El Camino Real (City Limit)	2,604	2,232	2	4	2,237	107	0	0	107	259	0	0	259	A

SHEET 14: 2040 WITHOUT PROJECT MODELED TRAFFIC VOLUMES

Road/Segment	ADT	Day (7 AM to 7 PM)				Evening (7 PM to 10 PM)				Nighttime (10 PM to 7 AM)				Notes
		Auto	MHDT	HHDT	Total	Auto	MHDT	HHDT	Total	Auto	MHDT	HHDT	Total	
Hayne Rd														
Skyline Blvd (City Limit) to Mosely Rd	11,166	9,059	11	21	9,090	396	0	1	397	1,672	2	4	1,678	A
Mosely Rd to Sandra Rd	8,680	7,318	12	21	7,351	260	0	1	261	1,063	2	3	1,068	A
Sandra Rd to Black Mountain Rd	3,957	3,326	2	3	3,330	111	0	0	112	515	0	0	516	A
Hillsborough Blvd														
Sharon Ave / Floribunda Ave to Ralston Ave	1,745	1,650	3	8	1,661	37	0	0	38	46	0	0	46	A
Ralston Ave to Barroilhet Ave	1,660	1,526	3	7	1,537	34	0	0	34	88	0	0	89	A
Barroilhet Ave to Bromfield Rd	1,731	1,576	3	7	1,587	37	0	0	37	106	0	0	107	A
Bromfield Rd to Edgewood Rd	110	99	0	0	99	5	0	0	5	6	0	0	6	A
Ralston Ave														
El Camino Real (City Limit) to Crescent Ave	3,191	2,437	1	2	2,440	156	0	0	157	594	0	0	594	A
Crescent Ave to Occidental Ave	5,665	4,363	1	2	4,367	265	0	0	265	1,033	0	1	1,034	A
Occidental Ave to Hillsborough Blvd	928	862	0	0	862	43	0	0	43	23	0	0	23	A
Hillsborough Blvd to Eucalyptus Ave	844	725	0	0	726	39	0	0	39	78	0	0	79	A
Eucalyptus to Chateau	3,119	2,518	2	4	2,524	136	0	0	136	458	0	1	459	A
Sharon Ave														
Forest View Ave to Floribunda Ave / Hillsborough Blvd	2,493	1,249	2	4	1,255	72	0	0	73	-48	0	0	-49	A
Summit Dr														
Skyline Blvd to Bella Vista Dr	3,951	3,160	3	5	3,168	157	0	0	158	624	1	1	626	A
Bella Vista Dr to Oakdale Rd	3,086	2,634	1	2	2,638	140	0	0	140	308	0	0	309	A
Tartan Trail														
Black Mountain Rd to Crystal Springs Rd	1,732	1,275	0	0	1,275	89	0	0	89	367	0	0	367	A
Tournament Dr														
Sugar Hill Dr to Tobin Clark Dr	366	345	0	0	345	6	0	0	6	15	0	0	15	A

SHEET 14: 2040 WITHOUT PROJECT MODELED TRAFFIC VOLUMES

Road/Segment	ADT	Day (7 AM to 7 PM)				Evening (7 PM to 10 PM)				Nighttime (10 PM to 7 AM)				Notes
		Auto	MHDT	HHDT	Total	Auto	MHDT	HHDT	Total	Auto	MHDT	HHDT	Total	
West Santa Inez Ave														
Hillsborough Blvd to Roblar Ave	4,177	3,524	2	3	3,529	121	0	0	121	527	0	0	527	A
Roblar Ave to El Camino Real	3,323	2,804	2	2	2,807	96	0	0	96	419	0	0	419	A
State Route 35 (Skyline Boulevard)														
Hayne Road to La Strada Ct (City Limit)	1,980	1,213	1	2	1,216	42	0	0	42	97	0	0	97	A
State Route 82 (El Camino Real)														
Forest View Ave to Ralston Ave	15,215	12,202	17	22	12,240	466	1	1	468	2,499	3	4	2,507	A
State Route 92														
Alameda De Las Pulgas to De Anza Blvd	34,145	25,833	63	153	26,049	1,337	3	8	1,348	6,692	16	40	6,748	A
Interstate 280 (Northbound)														
Northern City Limit to Crystal Springs Road	95,905	70,735	312	871	71,918	3,867	17	48	3,932	19,726	87	243	20,056	A
Interstate 280 (Southbound)														
Northern City Limit to Crystal Springs Road	100,369	75,638	300	825	76,763	3,378	13	37	3,429	19,881	79	217	20,177	A
Notes														
A. Traffic volumes obtained from the travel demand modeling conducted for the Project.														

SHEET 15: 2040 PLUS PROJECT TRAFFIC NOISE CONTOURS

Road/Segment	Modeled Average Daily Traffic (ADT) Volume	Modeled CNEL 50 Feet from Road Centerline	Distance from Modeled Road Center to Noise Contour Level				Notes
			60 CNEL	65 CNEL	70 CNEL	75 CNEL	
Black Mountain Rd							
Wedgewood Dr to Hayne Rd	2,895	52.1	8	3	1	0	A,B
Hayne Rd/West Santa Inez Ave to West Santa Inez Ave	4,002	53.1	10	3	1	0	A,B
Chateau Dr							
Ralston Ave to Provident Dr	3,471	52.1	8	3	1	0	A,B
Provident Dr to Skyline Blvd (City Limit)	2,939	53.8	12	4	1	0	A,B
Crystal Springs Rd							
Polhemus Rd (City Limit) to Woodridge Rd	3,214	57.5	28	9	3	1	A,B
Woodridge Rd to Ridgeway Rd	5,113	62.0	79	25	8	2	A,B
Ridgeway Rd to Alameda De Las Pulgas	9,161	57.5	28	9	3	1	A,B
Alameda De Las Pulgas to Harvard Rd	3,555	51.7	7	2	1	0	A,B
Harvard Rd to 3rd Ave	3,555	51.7	7	2	1	0	A,B
3rd Ave to El Camino Real	1,903	48.3	3	1	0	0	A,B
El Cerrito Ave							
Brentwood Rd to Crystal Springs Rd	5,874	59.6	46	15	5	1	A,B
Floribunda Ave							
El Camino Real (City Limit) to Sharon Ave / Hillsborough Blvd	4,370	54.4	14	4	1	0	A,B
Sharon Ave/Hillsborough Blvd to Eucalyptus Ave	1,428	49.3	4	1	0	0	A,B
Forest View Ave							
Eucalyptus Ave to Sharon Ave	2,457	51.9	8	2	1	0	A,B
Sharon Ave to El Camino Real (City Limit)	2,886	52.5	9	3	1	0	A,B
Hayne Rd							
Skyline Blvd (City Limit) to Mosely Rd	11,457	62.4	87	28	9	3	A,B
Mosely Rd to Sandra Rd	8,736	56.3	22	7	2	1	A,B
Sandra Rd to Black Mountain Rd	4,002	53.1	10	3	1	0	A,B
Hillsborough Blvd							
Sharon Ave / Floribunda Ave to Ralston Ave	1,761	47.9	3	1	0	0	A,B
Ralston Ave to Barroilhet Ave	1,669	48.9	4	1	0	0	A,B
Barroilhet Ave to Bromfield Rd	1,751	49.0	4	1	0	0	A,B
Bromfield Rd to Edgewood Rd	127	39.2	0	0	0	0	A,B
Ralston Ave							
El Camino Real (City Limit) to Crescent Ave	384	44.0	1	0	0	0	A,B
Crescent Ave to Occidental Ave	5,713	55.0	16	5	2	0	A,B
Occidental Ave to Hillsborough Blvd	1,047	46.6	2	1	0	0	A,B
Hillsborough Blvd to Eucalyptus Ave	955	47.6	3	1	0	0	A,B
Eucalyptus to Chateau	3,471	53.0	10	3	1	0	A,B

SHEET 15: 2040 PLUS PROJECT TRAFFIC NOISE CONTOURS

Road/Segment	Modeled Average Daily Traffic (ADT) Volume	Modeled CNEL 50 Feet from Road Centerline	Distance from Modeled Road Center to Noise Contour Level				Notes
			60 CNEL	65 CNEL	70 CNEL	75 CNEL	
Sharon Ave							
Forest View Ave to Floribunda Ave / Hillsborough Blvd	2,739	49.4	4	1	0	0	A,B
Summit Dr							
Skyline Blvd to Bella Vista Dr	4,312	53.5	11	4	1	0	A,B
Bella Vista Dr to Oakdale Rd	3,233	51.7	7	2	1	0	A,B
Tartan Trail							
Black Mountain Rd to Crystal Springs Rd	1,899	51.2	7	2	1	0	A,B
Tournament Dr							
Sugar Hill Dr to Tobin Clark Dr	441	43.2	1	0	0	0	A,B
West Santa Inez Ave							
Hillsborough Blvd to Roblar Ave	4,257	53.1	10	3	1	0	A,B
Roblar Ave to El Camino Real	3,224	54.7	15	5	1	0	A,B
State Route 35 (Skyline Boulevard)							
Hayne Road to La Strada Ct (City Limit)	2,075	56.7	23	7	2	1	A,B
State Route 82 (El Camino Real)							
Forest View Ave to Ralston Ave	15,224	63.4	108	34	11	3	A,B
State Route 92							
Alameda De Las Pulgas to De Anza Blvd	34,130	70.1	1,019	322	102	32	A,B
Interstate 280 (Northbound)							
Northern City Limit to Crystal Springs Rd	96,020	77.0	5,016	1,586	502	159	A,B
Interstate 280 (Southbound)							
Northern City Limit to Crystal Springs Rd	100,450	77.6	5,697	1,802	570	180	A,B

Notes

A. ADT is average daily traffic volume. ADT is bi-directional for all road segments except I-280. Traffic volumes obtained from the travel demand modeling conducted for the Project.

B. CNEL is estimated at 50 feet from the road center for all road segments except SR 92 and I-280, which is estimated at 100 feet from the road center.

SHEET 16: 2040 PLUS PROJECT TNM TRAFFIC VOLUME PERCENTAGES

Road/Segment	ADT	Time of Day Split			Daytime, Evening, Nighttime Fleet Mix			Notes
		Day (7 AM to 7 PM	Evening (7 PM to 10 PM)	Night (10 PM to 7 AM)	Auto	MHDT	HHDT	
Black Mountain Rd								
Wedgewood Dr to Hayne Rd	2,895	74.93%	4.83%	20.24%	100.00%	0.00%	0.00%	A
Hayne Rd/West Santa Inez Ave to West Santa Inez Ave	4,002	83.54%	2.84%	13.62%	99.86%	0.06%	0.08%	A
Chateau Dr								
Ralston Ave to Provident Dr	3,471	80.25%	4.39%	15.36%	99.76%	0.08%	0.16%	A
Provident Dr to Skyline Blvd (City Limit)	2,939	81.36%	3.93%	14.70%	99.81%	0.07%	0.11%	A
Crystal Springs Rd								
Polhemus Rd (City Limit) to Woodridge Rd	3,214	93.64%	3.52%	2.84%	99.92%	0.05%	0.04%	A
Woodridge Rd to Ridgeway Rd	5,113	86.31%	4.15%	9.54%	99.95%	0.03%	0.02%	A
Ridgeway Rd to Alameda De Las Pulgas	9,161	79.92%	4.67%	15.41%	99.91%	0.04%	0.05%	A
Alameda De Las Pulgas to Harvard Rd	3,555	99.82%	3.88%	-3.69%	99.92%	0.04%	0.03%	A
Harvard Rd to 3rd Ave	3,555	99.90%	3.88%	-3.78%	99.92%	0.04%	0.03%	A
3rd Ave to El Camino Real	1,903	99.93%	4.19%	-4.12%	99.91%	0.05%	0.04%	A
El Cerrito Ave								
Brentwood Rd to Crystal Springs Rd	5,874	76.10%	4.79%	19.11%	99.89%	0.04%	0.07%	A
Floribunda Ave								
El Camino Real (City Limit) to Sharon Ave / Hillsborough Blvd	4,370	76.27%	3.85%	19.88%	99.86%	0.04%	0.10%	A
Sharon Ave/Hillsborough Blvd to Eucalyptus Ave	1,428	79.20%	4.16%	16.66%	99.97%	0.01%	0.02%	A
Forest View Ave								
Eucalyptus Ave to Sharon Ave	2,457	75.01%	4.87%	20.12%	99.99%	0.00%	0.01%	A
Sharon Ave to El Camino Real (City Limit)	2,886	85.23%	4.15%	10.62%	99.78%	0.07%	0.15%	A
Hayne Rd								
Skyline Blvd (City Limit) to Mosely Rd	11,457	80.96%	3.60%	15.44%	99.66%	0.12%	0.22%	A
Mosely Rd to Sandra Rd	8,736	84.51%	3.02%	12.47%	99.56%	0.16%	0.29%	A
Sandra Rd to Black Mountain Rd	4,002	83.54%	2.84%	13.62%	99.86%	0.06%	0.08%	A

SHEET 16: 2040 PLUS PROJECT TNM TRAFFIC VOLUME PERCENTAGES

Road/Segment	ADT	Time of Day Split			Daytime, Evening, Nighttime Fleet Mix			Notes
		Day (7 AM to 7 PM	Evening (7 PM to 10 PM)	Night (10 PM to 7 AM)	Auto	MHDT	HHDT	
Hillsborough Blvd								
Sharon Ave / Floribunda Ave to Ralston Ave	1,761	96.36%	2.20%	1.45%	99.35%	0.20%	0.46%	A
Ralston Ave to Barroilhet Ave	1,669	93.55%	2.09%	4.93%	99.31%	0.21%	0.48%	A
Barroilhet Ave to Bromfield Rd	1,751	91.12%	2.20%	6.67%	99.34%	0.20%	0.46%	A
Bromfield Rd to Edgewood Rd	127	90.95%	4.38%	4.66%	100.00%	0.00%	0.00%	A
Ralston Ave								
El Camino Real (City Limit) to Crescent Ave	384	97.78%	2.81%	-0.59%	99.99%	0.01%	0.01%	A
Crescent Ave to Occidental Ave	5,713	76.82%	4.68%	18.50%	99.92%	0.03%	0.05%	A
Occidental Ave to Hillsborough Blvd	1,047	91.72%	4.54%	3.74%	99.94%	0.03%	0.03%	A
Hillsborough Blvd to Eucalyptus Ave	955	85.37%	4.59%	10.04%	99.93%	0.03%	0.04%	A
Eucalyptus to Chateau	3,471	80.25%	4.39%	15.36%	99.76%	0.08%	0.16%	A
Sharon Ave								
Forest View Ave to Floribunda Ave / Hillsborough Blvd	2,739	49.91%	2.97%	-1.22%	99.56%	0.14%	0.31%	A
Summit Dr								
Skyline Blvd to Bella Vista Dr	4,312	79.93%	4.03%	16.04%	99.78%	0.08%	0.13%	A
Bella Vista Dr to Oakdale Rd	3,233	85.36%	4.60%	10.04%	99.89%	0.05%	0.06%	A
Tartan Trail								
Black Mountain Rd to Crystal Springs Rd	1,899	73.92%	5.21%	20.87%	100.00%	0.00%	0.00%	A
Tournament Dr								
Sugar Hill Dr to Tobin Clark Dr	441	93.82%	1.86%	4.31%	100.00%	0.05%	0.03%	A
West Santa Inez Ave								
Hillsborough Blvd to Roblar Ave	4,257	84.00%	2.94%	13.07%	99.87%	0.06%	0.07%	A
Roblar Ave to El Camino Real	3,224	89.01%	2.57%	8.42%	99.84%	0.07%	0.09%	A
State Route 35 (Skyline Boulevard)								
Hayne Road to La Strada Ct (City Limit)	2,075	59.48%	2.17%	5.06%	99.78%	0.07%	0.15%	A
State Route 82 (El Camino Real)								
Forest View Ave to Ralston Ave	15,224	80.36%	3.09%	16.55%	99.69%	0.14%	0.18%	A

SHEET 16: 2040 PLUS PROJECT TNM TRAFFIC VOLUME PERCENTAGES

Road/Segment	ADT	Time of Day Split			Daytime, Evening, Nighttime Fleet Mix			Notes
		Day (7 AM to 7 PM	Evening (7 PM to 10 PM)	Night (10 PM to 7 AM)	Auto	MHDT	HHDT	
State Route 92								
Alameda De Las Pulgas to De Anza Blvd	34,130	76.35%	3.96%	19.70%	99.17%	0.24%	0.59%	A
Interstate 280 (Northbound)								
Northern City Limit to Crystal Springs Rd	96,020	74.99%	4.10%	20.91%	98.36%	0.44%	1.21%	A
Interstate 280 (Southbound)								
Northern City Limit to Crystal Springs Rd	100,450	76.47%	3.42%	20.10%	98.54%	0.39%	1.07%	A
Notes								
A. Time of day and fleet percentages were obtained from the travel demand modeling conducted for the Project.								

SHEET 17: 2040 PLUS PROJECT MODELED TRAFFIC VOLUMES

Road/Segment	ADT	Day (7 AM to 7 PM)				Evening (7 PM to 10 PM)				Nighttime (10 PM to 7 AM)				Notes
		Auto	MHDT	HHDT	Total	Auto	MHDT	HHDT	Total	Auto	MHDT	HHDT	Total	
Black Mountain Rd														
Wedgewood Dr to Hayne Rd	2,895	2,169	0	0	2,169	140	0	0	140	586	0	0	586	A
Hayne Rd/West Santa Inez Ave to West Santa Inez Ave	4,002	3,339	2	3	3,344	114	0	0	114	544	0	0	545	A
Chateau Dr														
Ralston Ave to Provident Dr	3,471	2,779	2	4	2,785	152	0	1	152	532	0	1	533	A
Provident Dr to Skyline Blvd (City Limit)	2,939	2,387	2	3	2,392	115	0	0	116	431	0	0	432	A
Crystal Springs Rd														
Polhemus Rd (City Limit) to Woodridge Rd	3,214	3,007	1	1	3,009	113	0	0	113	91	0	0	91	A
Woodridge Rd to Ridgeway Rd	5,113	4,411	1	1	4,413	212	0	0	212	487	0	0	488	A
Ridgeway Rd to Alameda De Las Pulgas	9,161	7,315	3	4	7,321	428	0	0	428	1,411	1	1	1,412	A
Alameda De Las Pulgas to Harvard Rd	3,555	3,545	2	1	3,548	138	0	0	138	-131	0	0	-131	A
Harvard Rd to 3rd Ave	3,555	3,548	2	1	3,551	138	0	0	138	-134	0	0	-134	A
3rd Ave to El Camino Real	1,903	1,900	1	1	1,901	80	0	0	80	-78	0	0	-78	A
El Cerrito Ave														
Brentwood Rd to Crystal Springs Rd	5,874	4,465	2	3	4,470	281	0	0	282	1,121	0	1	1,122	A
Floribunda Ave														
El Camino Real (City Limit) to Sharon Ave / Hillsborough Blvd	4,370	3,328	1	3	3,333	168	0	0	168	868	0	1	869	A
Sharon Ave/Hillsborough Blvd to Eucalyptus Ave	1,428	1,131	0	0	1,131	59	0	0	59	238	0	0	238	A
Forest View Ave														
Eucalyptus Ave to Sharon Ave	2,457	1,843	0	0	1,843	120	0	0	120	494	0	0	494	A
Sharon Ave to El Camino Real (City Limit)	2,886	2,454	2	4	2,460	120	0	0	120	306	0	0	306	A

SHEET 17: 2040 PLUS PROJECT MODELED TRAFFIC VOLUMES

Road/Segment	ADT	Day (7 AM to 7 PM)				Evening (7 PM to 10 PM)				Nighttime (10 PM to 7 AM)				Notes
		Auto	MHDT	HHDT	Total	Auto	MHDT	HHDT	Total	Auto	MHDT	HHDT	Total	
Hayne Rd														
Skyline Blvd (City Limit) to Mosely Rd	11,457	9,244	11	20	9,275	411	0	1	413	1,763	2	4	1,769	A
Mosely Rd to Sandra Rd	8,736	7,350	12	21	7,383	263	0	1	264	1,085	2	3	1,089	A
Sandra Rd to Black Mountain Rd	4,002	3,339	2	3	3,344	114	0	0	114	544	0	0	545	A
Hillsborough Blvd														
Sharon Ave / Floribunda Ave to Ralston Ave	1,761	1,686	3	8	1,697	38	0	0	39	25	0	0	25	A
Ralston Ave to Barroilhet Ave	1,669	1,551	3	8	1,561	35	0	0	35	82	0	0	82	A
Barroilhet Ave to Bromfield Rd	1,751	1,585	3	7	1,596	38	0	0	39	116	0	1	117	A
Bromfield Rd to Edgewood Rd	127	116	0	0	116	6	0	0	6	6	0	0	6	A
Ralston Ave														
El Camino Real (City Limit) to Crescent Ave	384	376	0	0	376	11	0	0	11	-2	0	0	-2	A
Crescent Ave to Occidental Ave	5,713	4,385	1	2	4,389	267	0	0	267	1,056	0	1	1,057	A
Occidental Ave to Hillsborough Blvd	1,047	960	0	0	960	47	0	0	48	39	0	0	39	A
Hillsborough Blvd to Eucalyptus Ave	955	814	0	0	815	44	0	0	44	96	0	0	96	A
Eucalyptus to Chateau	3,471	2,779	2	4	2,785	152	0	0	152	532	0	1	533	A
Sharon Ave														
Forest View Ave to Floribunda Ave / Hillsborough Blvd	2,739	1,361	2	4	1,367	81	0	0	81	-33	0	0	-33	A
Summit Dr														
Skyline Blvd to Bella Vista Dr	4,312	3,439	3	5	3,446	173	0	0	174	690	1	1	692	A
Bella Vista Dr to Oakdale Rd	3,233	2,757	1	2	2,760	148	0	0	149	324	0	0	325	A
Tartan Trail														
Black Mountain Rd to Crystal Springs Rd	1,899	1,404	0	0	1,404	99	0	0	99	396	0	0	396	A
Tournament Dr														
Sugar Hill Dr to Tobin Clark Dr	441	414	0	0	414	8	0	0	8	19	0	0	19	A

SHEET 17: 2040 PLUS PROJECT MODELED TRAFFIC VOLUMES

Road/Segment	ADT	Day (7 AM to 7 PM)				Evening (7 PM to 10 PM)				Nighttime (10 PM to 7 AM)				Notes
		Auto	MHDT	HHDT	Total	Auto	MHDT	HHDT	Total	Auto	MHDT	HHDT	Total	
West Santa Inez Ave														
Hillsborough Blvd to Roblar Ave	4,257	3,571	2	3	3,576	125	0	0	125	556	0	0	556	A
Roblar Ave to El Camino Real	3,224	2,865	2	3	2,870	83	0	0	83	271	0	0	271	A
State Route 35 (Skyline Boulevard)														
Hayne Road to La Strada Ct (City Limit)	2,075	1,232	1	2	1,234	45	0	0	45	105	0	0	105	A
State Route 82 (El Camino Real)														
Forest View Ave to Ralston Ave	15,224	12,196	17	21	12,234	469	1	1	471	2,511	3	4	2,519	A
State Route 92														
Alameda De Las Pulgas to De Anza Blvd	34,130	25,841	63	153	26,057	1,339	3	8	1,350	6,667	16	39	6,723	A
Interstate 280 (Northbound)														
Northern City Limit to Crystal Springs Road	96,020	70,825	317	870	72,006	3,874	17	48	3,939	19,746	88	242	20,076	A
Interstate 280 (Southbound)														
Northern City Limit to Crystal Springs Road	100,450	75,697	302	822	76,817	3,387	14	37	3,437	19,901	79	216	20,195	A
Notes														
A. Traffic volumes obtained from the travel demand modeling conducted for the Project.														