

Draft Environmental Impact Report

Serramonte Del Rey Campus Redevelopment

SCH# 2023060571



In Consultation with
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June 2023

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SUMMARY

The City of Daly City, as the Lead Agency, has prepared this Draft Environmental Impact Report (EIR) for the Serramonte Del Rey Campus Redevelopment project in compliance with the California Environmental Quality Act (CEQA) and the CEQA Guidelines.

As the CEQA Lead Agency for this project, the City of Daly City is required to consider the information in the EIR along with any other available information in deciding whether to approve the project. The basic requirements for an EIR include discussions of the environmental setting, significant environmental impacts (including growth-inducing impacts and cumulative impacts), mitigation measures, and alternatives. It is not the intent of an EIR to recommend either approval or denial of a project.

Summary of the Project

The approximately 22-acre project site is located on the south side of Serramonte Boulevard between the intersections of Callan Boulevard/Serramonte Boulevard and St. Francis Boulevard/Serramonte Boulevard in the City of Daly City (APN 091-211-230). The site is currently developed with the Jefferson Union High School District offices and adult education buildings, Head Start, Parcel A Development project (JUHSD Faculty and Staff Housing project consisting of 122 units), surface parking lots, and associated landscaping.

The project consists of two primary components: (1) development of a new approximately 22-acre Serramonte Del Rey Precise Plan (Precise Plan), and (2) a specific development proposal for the approximately 4.3-acre Parcel B within a portion of the new Precise Plan.

The new Precise Plan would allow for the redevelopment of the project site area with up to 1,235 units (which includes the existing 122 units on Parcel A) of affordable and market-rate rental housing, up to 14,000 square feet of neighborhood-serving retail/commercial uses (in addition to 2,400 square feet for a Head Start childcare facility), and infrastructure improvements throughout the project area. Compared to the existing approved Precise Plan, the proposal would result in a net increase of 1,060 residential units and the elimination of planned office space.

The proposed Parcel B development would demolish an existing Adult Education building and surface parking on-site and construct a seven-story, mixed-use building with 201 residential units and approximately 8,000 square feet of retail space on a 4.3 acre portion of the site located at the northwest corner of the project site. The building would include two levels of parking, with one level of below grade parking.

Summary of Significant Impacts and Mitigation Measures

The following is a summary of the significant impacts and mitigation measures addressed within this EIR. The project description and full discussion of impacts and mitigation measures can be found in Section 2.0 Project Description and Section 3.0 Environmental Setting, Impacts, and Mitigation.

Significant Impact	Mitigation Measures
Impact AIR-2: The project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. (Less than Significant Impact with Mitigation Incorporated)	MM AIR-2.1: BAAQMD Best Management Practices: The project shall implement the Bay Area Air Quality Management District's (BAAQMD's) recommended best management practices (BMPs) and additional measures to reduce construction equipment exhaust emissions. These measures shall include the following: • All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered three times a day and at a frequency adequate to maintain minimum soil moisture of 12 percent. Moisture content shall be verified by lab samples or moisture probe. • All haul trucks transporting soil, sand, or other loose material off-site shall be covered. • All visible mud or dirt track-out onto adjacent public roads shall be removed using a wet power vacuum street sweeper at least once per day. The use of dry power sweeping shall be prohibited. • All vehicle speeds on unpaved roads shall be limited to 15 mph. • All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used. • All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation. • Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations. • All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph and visible dust extends beyond site boundaries. • Wind breaks (e.g., trees, fences) shall be installed on the windward side(s) of actively disturbed areas of construction adjacent to sensitive receptors. Wind breaks should have at maximum 50 percent air porosity. • Vegetative ground cover (e.g., fast-germinating native grass seed) shall be planted in disturbed areas as soon as possible and watered appropriately until vegetation is established.

Significant Impact	Mitigation Measures
	• The simultaneous occurrence of excavation, grading, and ground-disturbing construction activities on the same area at any one time shall be limited. Activities shall be phased to reduce the amount of disturbed surfaces at any one time. • Avoid tracking of visible soil material on to public roadways by employing the following measures if necessary: (1) Site accesses to a distance of 100 feet from public paved roads shall be treated with a 6 to 12-inch compacted layer of wood chips, mulch, or gravel and (2) washing truck tires and construction equipment of prior to leaving the site. • Sandbags or other erosion control measures shall be installed to prevent silt runoff to public roadways from sites with a slope greater than one percent. MM AIR-2.2: <u>Selection of Construction Equipment:</u> All construction equipment larger than 25 horsepower used at the site for more than two continuous days or 20 hours total shall meet U.S. Environmental Protection Agency (EPA) Tier 4 emission standards PM (PM10 and PM2.5), if feasible, otherwise, • Use equipment that meets U.S. EPA emission standards for Tier 2 or 3 engines and include particulate matter emissions control equivalent to California Air Resources Board (CARB) Level 3 verifiable diesel emission control devices that altogether achieve a 50-percent reduction in particulate matter exhaust in comparison to uncontrolled equipment; alternatively (or in combination). • Use of electrical or non-diesel fueled equipment. Alternatively, the applicant may develop another construction operations plan demonstrating that the construction equipment used on-site would achieve a reduction in construction diesel particulate matter emissions by 70 percent or greater. Elements of the plan could include a combination of some of the following measures: • Implementation of Tier 4 or alternatively fueled equipment, • Installation of electric power lines during early construction phases to avoid use of diesel generators and compressors, • Use of electrically-powered equipment,

Significant Impact	Mitigation Measures
	• Forklifts and aerial lifts used for exterior and interior building construction shall be electric or propane/natural gas powered, • Change in construction build-out plans to lengthen phases, and • Implementation of different building techniques that result in less diesel equipment usage. Such a construction operations plan would be subject to review by an air quality expert and approved by the City prior to construction. MM AIR-2.3: Low Volatile Organic Compounds (VOC) Coating: The project shall use low volatile organic compound or VOC (i.e., ROG) coatings, that are below current BAAQMD requirements (i.e., Regulation 8, Rule 3: Architectural Coatings), for at least 50 percent of all residential and nonresidential interior paints and 50 percent of exterior paints. This includes all architectural coatings applied during both construction and reapplications throughout the project’s operational lifetime. At least 50 percent of coatings applied must meet a “super-compliant” VOC standard of less than 10 grams of VOC per liter of paint. For reapplication of coatings during the project’s operational lifetime, the Declaration of Covenants, Conditions, and Restrictions shall contain a stipulation for low VOC coatings to be used.
Impact AIR-3: The project would not expose sensitive receptors to substantial pollutant concentrations. (Less than Significant Impact with Mitigation Incorporated)	See mitigation measures MM AIR-2.1 and MM AIR-2.2 above. MM AIR-3.1: Prior to the issuance of a grading permit, the applicant shall provide the City with the most recent construction phasing schedule by parcel for buildout of the proposed Precise Plan. If the most recent construction phasing schedule increases the number of units per construction phase compared to the construction phasing assumed in the air quality analysis of this EIR, the applicant shall prepare an updated community health risk assessment to confirm that the new phasing will not result in any new or more significant air quality impacts not previously disclosed in this EIR. The updated community health risk assessment shall be reviewed and approved by the Director of Community Development or Director’s designee.

Significant Impact	Mitigation Measures
Impact AIR-C: The project would not result in a cumulatively considerable contribution to a cumulatively significant air quality impact. (Less than Significant Cumulative Impact with Mitigation Incorporated)	See mitigation measures MM AIR-2.1 and MM AIR-2.2 above.
Impact BIO-1: The project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. (Less than Significant Impact with Mitigation Incorporated)	MM BIO-1.1: • If construction is initiated during the non-breeding season (September 1 to January 31), then vegetation removal, building demolition and other construction may proceed with no restrictions. • If initial building demolition, vegetation removal, and construction is proposed during the nesting season (February 1 to August 31), a focused survey for nesting raptors and other native birds shall be conducted by a qualified biologist within 14 days prior to the onset of construction in order to determine whether any active nests are present on the site and surrounding area within 250 feet of proposed construction. The survey shall be reconducted any time construction has been delayed or curtailed for more than 14 days during the nesting season. • If no active nests are identified during the construction survey period, then building demolition, vegetation removal, and other construction may proceed with no restrictions. • If active bird nests are found, an adequate setback shall be established by a qualified biologist, approved by the City Planning Division, around the nest location and construction activities restricted within this no-disturbance zone until the qualified biologist has confirmed that any young birds have fledged and are able to function outside the nest location. Required setback distances for the no-disturbance zone shall be based on input received from the CDFW and may vary depending on species and sensitivity to disturbance. As necessary, the no-disturbance zone shall be fenced with temporary orange construction fencing if construction is to be initiated elsewhere on the site outside this zone. • A report of findings shall be prepared by the qualified biologist and submitted to the Director of Community Development or Director's designee for review and approval prior to initiation of construction during the nesting season (February 1 to August 31). The report shall either confirm absence of any active nests or should confirm that any young are located within a designated no-disturbance zone and construction can proceed. No report of findings is required if construction is initiated during the non-

Significant Impact	Mitigation Measures
	nesting season (September 1 to January 31) and continues uninterrupted according to the above criteria. MM BIO-1.2: Adequate measures shall be taken to avoid roosting by special-status bat species as a result of tree removal and building demolition, specifically: • To the extent feasible, any tree removal or trimming that is deemed necessary by a certified arborist to maintain tree health shall be conducted outside of the bat maternity season (i.e., generally avoiding tree removal or trimming April through October). • Building demolition shall, to the extent feasible, be conducted outside of the bat maternity season (i.e., generally avoiding demolition April through October). • If tree removal, trimming, or building demolition occurs within bat maternity season (i.e., generally April through October), a pre-construction bat roost assessment shall be conducted by a qualified biologist at least 14 days and no more than 30 days prior to tree removal or building demolition to determine if bats roosts are present that may be impacted by project activities. • If special-status bat species or maternity roosts are detected during these surveys, a qualified biologist shall identify any additional measures required to protect the roosts, such as including avoidance of the roosts until the end of the maternity roosting season. • Regardless of the timing of tree removal or trimming activities, all felled trees or large limbs shall 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. • A report of findings shall be prepared by the qualified biologist and submitted to the Director of Community Development or Director's designee for review and approval prior to initiation of construction during the maternity roosting season (April through October). The report shall either confirm absence of any active maternity roosts or specify any additional measures necessary to protect roosts until the end of the maternity roosting season. No report of findings is required if construction is initiated during the non-maternity roosting season (November through March) and continues uninterrupted according to the above criteria.

Significant Impact	Mitigation Measures
Impact BIO-C: The project would not result in a cumulatively considerable contribution to a cumulatively significant biological resources impact. (Less than Significant Cumulative Impact with Mitigation Incorporated)	See mitigation measures MM BIO-1.1 and MM BIO-1.2 above.
Impact CUL-2: The project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5. (Less than Significant Impact with Mitigation Incorporated)	MM CUL-2.1: <u>Undiscovered Archaeological Resources.</u> If evidence of an archaeological site or other suspected cultural resource as defined by CEQA Guideline Section 15064.5, including darkened soil representing past human activity (“midden”), that could conceal material remains (e.g., worked stone, worked bone, fired clay vessels, faunal bone, hearths, storage pits, or burials) is discovered during construction related earth-moving activities, all ground-disturbing activity within 100 feet of the resources shall be halted and the City’s Planning Manager shall be notified. The project sponsor shall hire a qualified archaeologist to conduct a field investigation. the City’s Planning Manager shall consult with the archaeologist to assess the significance of the find. Impacts to any significant resources shall be mitigated to a less-than-significant level through data recovery or other methods determined adequate by a qualified archaeologist and that are consistent with the Secretary of the Interior’s Standards for Archaeological documentation. Any identified cultural resources shall be recorded on the appropriate DPR 523 (A-J) form and filed with the NWIC. MM CUL-2.2: <u>Report of Archaeological Resources.</u> If archaeological resources are identified, a final report summarizing the discovery of cultural materials shall be submitted to the City’s Planning Manager prior to issuance of certificate of occupancy. This report shall contain a description of the mitigation program that was implemented and its results, including a description of the monitoring and testing program, a list of the resources found and conclusion, and a description of the disposition/curation of the resources.
Impact CUL-3: The project would not disturb any human remains, including those interred outside of dedicated cemeteries. (Less than Significant Impact with Mitigation Incorporated)	MM CUL-3.1: <u>Human Remains.</u> If human remains are discovered during project construction, all ground-disturbing activity within 100 feet of the resources shall be halted and the City’s Planning Manager and the San Mateo County coroner shall be notified immediately, according to Section 5097.98 of the State Public Resources Code and Section 7050.5 of California’s Health and Safety Code. If the remains are determined by the County coroner to be Native American, the Native American Heritage Commission (NAHC) shall be notified within 24 hours, and the guidelines of the NAHC

Significant Impact	Mitigation Measures
	shall be adhered to in the treatment and disposition of the remains. The project sponsor shall also retain a professional archaeologist with Native American burial experience to conduct a field investigation of the specific site and consult with the Most Likely Descendant, if any, identified by the NAHC. As necessary, the archaeologist may provide professional assistance to the Most Likely Descendant, including the excavation and removal of the human remains. The City of Daly City shall be responsible for approval of recommended mitigation as it deems appropriate, taking account of the provisions of State law, as set forth in CEQA Guidelines section 15064.5(e) and Public Resources Code section 5097.98. The project sponsor shall implement approved mitigation, to be verified by the City of Daly City, before the resumption of ground-disturbing activities within 100 feet of where the remains were discovered.
Impact GEO-6: The project would not directly or indirectly destroy a unique paleontological resource or site or unique geological feature. (Less than Significant Impact with Mitigation Incorporated)	MM GEO-6.1: <u>Unique Paleontological and/or Geologic Features and Reporting.</u> Should a unique paleontological resource or site or unique geological feature be identified at the project site during any phase of construction, all ground disturbing activities within 25 feet shall cease and the City’s Planning Director notified immediately. A qualified paleontologist shall evaluate the find and prescribe mitigation measures to reduce impacts to a less than significant level. Work may proceed on other parts of the project site while mitigation for paleontological resources or geologic features is implemented. Upon completion of the paleontological assessment, a report shall be submitted to the City and, if paleontological materials are recovered, a paleontological repository, such as the University of California Museum of Paleontology.
Impact GEO-C: The project would not result in a cumulatively considerable contribution to a cumulatively significant geology and soils impact. (Less than Significant Cumulative Impact with Mitigation Incorporated)	See mitigation measure MM GEO-6.1 above.
Impact HAZ-2: The project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. (Less than Significant Impact with Mitigation Incorporated)	MM HAZ-2.1: Prior to the issuance of demolition, grading, or building permits for projects on Parcels C-E, the applicant shall remove the existing underground storage tanks (USTs) and aboveground storage tanks (ASTs) in accordance with the San Mateo County Department of Environmental Health’s (SMCDEH) Underground Storage Tank Program and Aboveground Petroleum Storage Tank Program. During removal of the ASTs and USTs, contractors shall observe for staining and spilled contaminants. If stains and/or spills are observed, an Environmental Professional shall be retained to collect soil samples for laboratory analysis in accordance

Significant Impact	Mitigation Measures
	with commonly accepted environmental protocols. If contaminants are identified at concentrations exceeding applicable screening levels published by the RWQCB, DTSC and/or EPA , appropriate mitigation measures, such as, but not limited to, a Soil Management Plan and Health Safety Plan, shall be incorporated into the demolition permit. Approval by an appropriate regulatory agency (i.e., RWQCB, DTSC or SMCDEH) shall be obtained prior to conducting earthwork activities in the vicinity of the impacted soil. The applicant shall provide documentation of the safe removal of all existing USTs and ASTs consistent with SMCDEH requirements to Director of Economic and Community Development or Director's designee for review and approval.
Impact HAZ-3: The project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. (Less than Significant Impact with Mitigation Incorporated)	See mitigation measure MM HAZ-2.1 above.
Impact NOI-1: The project would not result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. (Less than Significant Impact with Mitigation Incorporated)	MM NOI-1.1: The applicant shall develop a construction noise control plan for each construction phase, including, but not limited to, the following available controls: • Construct temporary noise barriers, where feasible, to screen stationary noise-generating equipment. Temporary noise barrier fences would provide a 5 dBA noise reduction if the noise barrier interrupts the line-of-sight between the noise source and receptor and if the barrier is constructed in a manner that eliminates any cracks or gaps. • Equip all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment. • Unnecessary idling of internal combustion engines should be strictly prohibited. • Locate stationary noise-generating equipment, such as air compressors or portable power generators, as far as possible from sensitive receptors as feasible. If they must be located near receptors, adequate muffling (with enclosures where feasible and appropriate) shall be used to reduce noise levels at the adjacent sensitive receptors. Any enclosure openings or venting shall face away from sensitive receptors. • Utilize "quiet" air compressors and other stationary noise sources where technology exists.

Significant Impact	Mitigation Measures
	• Construction staging areas shall be established at locations that will create the greatest distance between the construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction. • Locate material stockpiles, as well as maintenance/equipment staging and parking areas, as far as feasible from residential receptors. • Route construction-related traffic along major roadways and as far as feasible from sensitive receptors. • Locate material stockpiles, as well as maintenance/equipment staging and parking areas, as far as feasible from residential receptors. • Control noise from construction workers' radios to a point where they are not audible at existing residences bordering the project site. • The contractor shall prepare a detailed construction schedule for major noise-generating construction activities. The construction plan shall identify a procedure for coordination with adjacent residential land uses so that construction activities can be scheduled to minimize noise disturbance. • Designate a "disturbance coordinator" who would be responsible for responding to any complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., bad muffler, etc.) and will require that reasonable measures be implemented to correct the problem. Conspicuously post a telephone number for the disturbance coordinator at the construction site and include in it the notice sent to neighbors regarding the construction schedule.
Impact TRN-2: The project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). (Less than Significant Impact with Mitigation Incorporated)	MM TRN-2.1: Prior to issuance of building permits, the project applicant shall develop a transportation demand management (TDM) plan for the proposed project (except for the Parcel A development project which has already been occupied) in accordance with C/CAG's Transportation Demand Management Policy Implementation Guide, including any anticipated phasing, and shall submit the TDM Plan to the City for review and approval. The TDM Plan shall identify trip reduction strategies as well as mechanisms for funding and overseeing the delivery of trip reduction programs and strategies. The TDM Plan shall be designed to achieve the trip reduction, as required to reduce the VMT per resident from 12.0 to 11.6. The TDM Plan shall describe which measures apply to the entire site and which, if any, apply on a parcel-by-parcel basis.

Significant Impact	Mitigation Measures
	Trip reduction strategies applicable to the proposed project may include, but are not limited to, the following: • Provide Secure and Accessible Bike Parking • Provide Bicycle Maintenance Facilities • Price and Unbundle Parking • Provide Carpooling Programs • Implement Car-Sharing Program • Implement Loaner Bike Program • Provide a Transit Riders Guide • Provide a Dedicated Transportation Coordinator • Provide an Online TDM Information Center • Free Trial Rides on Transit Services • Implement a Subsidized or Discounted Transit Program The TDM plan shall indicate the estimated Vehicle Trip Reduction (VTR) for each strategy proposed based on published research or guidelines. For TDM measures containing ongoing operational VTR strategies, the TDM plan shall include an ongoing monitoring and enforcement program to ensure the Plan is implemented on an ongoing basis during project operation. For VTR strategies involving physical improvements, the project shall obtain the necessary permits/approvals from the City and install the improvements prior to building occupancy. Applicant will resubmit TDM Plan if there is a material adverse impact resulting from a change from the permitted uses (i.e., unit count, use type, phasing). The TDM Plan shall require annual evaluation of the program by the property owner, to determine if the program goals in reducing automobile travel are satisfied and to assess the effectiveness of the various strategies implemented. The property owner shall be required to conduct biennial self-certification for the first six years of project occupancy per the C/CAG TDM Program. The property owner shall conduct annual travel surveys and driveway counts to monitor the amount of automobile travel generated by the project. The goal of the TDM Plan and programs shall be to reduce the project's daily VMT per resident from 12.0 to 11.6. Based on the results of the surveys, the TDM programs shall be increased if these requirements are not met. Annual travel surveys and driveway counts (TDM program monitoring) shall be conducted for the first two years following project occupancy. The results of the monitoring program and travel surveys shall be submitted to the City for review and

Significant Impact	Mitigation Measures
	approval. If the program VMT reduction goals are met in the first six years, annual monitoring and surveys shall be suspended. If the program's VMT reduction goals are not satisfied, site management shall prepare and submit for City approval a Corrective Action Plan. The Corrective Action Plan shall detail the additional TDM measures to be implemented on site and their expected travel/mode split reduction. Additional annual travel surveys and driveway counts shall be conducted for the two years following the implementation of the Corrective Action Plan to determine if the program's VMT reduction goals are satisfied.
Impact TRN-3: The project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). (Less than Significant Impact with Mitigation Incorporated)	MM TRN-3.1: A Construction Traffic Management Plan shall be developed and implemented to minimize impacts to the transportation system. The Construction Traffic Management Plan shall detail the Project's construction schedule, vehicle type time-of-day plans, route planning, advanced public notices of partial or full street closures or traffic diversion, and other strategies to reduce potential conflicts during construction. The plan shall include, but not be limited to, the following: • Identification of the traffic controls and methods proposed during each phase of Project construction. Provision of safe and adequate access for vehicles, transit, bicycles, and pedestrians. Traffic controls and methods employed during construction shall be in accordance with Daly City standards and the requirements of the California Manual of Uniform Traffic Control Devices (CA MUTCD 2014, Revision 6). • Provision of notice to relevant emergency services, thereby avoiding interference with adopted emergency plans, emergency vehicle access, or emergency evacuation plans. • A prohibition on all construction truck activity during the weekday morning and evening peak commute periods (7:00 a.m. to 9:00 a.m. and 4:00 p.m. to 6:00 p.m.). • Preservation of emergency vehicle access. • Identification of approved truck routes in communication with Daly City staff. • Location of staging areas and the location of construction worker parking. • Identification of the means and locations of the separation (i.e. fencing) of construction areas and adjacent active uses. • The provision of flaggers at all on-site locations where construction trucks and construction worker

Significant Impact	Mitigation Measures
	vehicles conflict with vehicle, bicycle, transit, or pedestrian traffic. • Provision of a point of contact for residents to obtain construction information, have questions answered and convey complaints. MM TRN-3.2: As part of the Parcel B Development project’s final design, details of the Serramonte Boulevard parking garage driveway design would include the following as determined necessary by the City Traffic Engineer: • Measures to prohibit vehicular left-turns – either through the installation of a hard concrete median, vertical delineators, or alternative means. • Adequate sight distance – obstructions to sight distance for all users should not be placed adjacent to the driveway and adequate throat distance to the garage entry should be provided accordingly. • Pedestrian and bicycle warning measures – adequate warning measures for pedestrians and bicycles should be provided on Serramonte Boulevard, including the installation of tactile domes on the sidewalk and green hatched bike lane striping on the roadway. • The Parcel B driveway along Serramonte Blvd. shall provide satisfactory separation distance from the intersection of Serramonte Blvd. and Highway 1 on- and off-ramps to address merging and any turning movements. • A separate traffic study shall be conducted to determine if a new traffic signal at the Parcel B driveway is warranted. The results of the study will affect the City’s determination on whether a driveway entry and exit shall be permitted along Serramonte Blvd. MM TRN-3.3: As part of the project’s final design, each residential facility’s garage entrance accessed via the public right of way shall be designed to provide adequate storage for expected vehicle queues. The amount of storage shall be calculated based on the individual garage size and forecast rates of arrival and departure. A minimum stacking distance of 25 feet shall be provided between the back of curb and gate installation at the entrance to each residential garage entrance. The purpose of this space is to minimize the instance of vehicles queued across sidewalks and bicycle facilities. These queue calculations shall be performed for

Significant Impact	Mitigation Measures
	each garage and submitted to the City Engineer with planning/building permit for review and approval.
Impact TRN-4: The project would not result in inadequate emergency access. (Less than Significant Impact with Mitigation Incorporated)	MM TRN-4.1: In accordance with City and North County Fire Authority requirements and design standards, all future development within the project site shall provide even surface pavement, appropriate signage, delineation, and other features at all emergency access points and internal roadways to accommodate emergency vehicles. As part of the final design and permitting process, each proposed development shall seek and obtain approval from the North County Fire Authority.
Impact TRN-C: The project would not result in a cumulatively considerable contribution to a cumulatively significant transportation impact. (Less than Significant Cumulative Impact with Mitigation Incorporated)	See mitigation measure MM TRN-2.1 above.
Impact TCR-1: The project would not cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k). (Less than Significant Impact with Mitigation Incorporated)	See mitigation measures MM CUL-2.1, MM CUL-2.2, and MM CUL-3.1 above.
Impact TCR-2: The project would not cause a substantial adverse change in the significance of a tribal cultural resource that is determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. (Less than Significant Impact with Mitigation Incorporated)	See mitigation measures MM CUL-2.1, MM CUL-2.2, and MM CUL-3.1 above.
Impact TCR-C: The project would not result in a cumulatively considerable contribution to a cumulatively significant tribal cultural resources impact. (Less than Significant Cumulative Impact with Mitigation Incorporated)	See mitigation measures MM CUL-2.1, MM CUL-2.2, and MM CUL-3.1 above.

Summary of Project Alternatives

The California Environmental Quality Act (CEQA) requires that an EIR identify alternatives to the project as proposed. The CEQA Guidelines state that an EIR must identify alternatives that would feasibly attain the most basic objectives of the project, but avoid or substantially lessen significant environmental effects, or further reduce impacts that are considered less than significant with the incorporation of mitigation. A summary of project alternatives follows. The EIR considered three alternatives, beyond those presented below, but rejected them for further analysis. A full analysis of project alternatives is provided in Section 7.0 Alternatives.

No Project Alternative

The No Project Alternative assumes that the project site would remain as it is today with the existing buildings being reoccupied. All environmental impacts of the project would be avoided. However, this alternative would not achieve any of the project objectives.

No Project – Existing Zoning Alternative

The No Project – Existing Zoning Alternative is 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. This alternative assumes the project is not approved and the project site is redeveloped consistent with the current zoning of PD-31 (Planned Development District).¹ The PD-31 zoning is the current 1985 Precise Plan for the project site, which allows for the development of up to 175 residential units (53 units in addition to the 122 units developed on Parcel A) and approximately 700,000 square feet of office space. Associated infrastructure and roadway improvements would also be required in order to construct the No Project – Existing Zoning Alternative. This alternative would lessen the project's construction criteria pollutant, TAC health risk, construction noise, and construction traffic impacts because it would reduce overall building square footage by approximately 500,000 square feet, but result in slightly greater VMT impacts per resident. This alternative would result in the same or similar impacts to all other environmental resource areas as the project. This alternative does not meet the project objective of providing new market-rate and affordable housing given this alternative would yield 175 units, substantially below the 1,235 proposed. This alternative would result in substantial office space on the project site, which is not an objective of the project.

Environmentally Superior Alternative

The CEQA Guidelines state that an EIR shall identify an environmentally superior alternative. As described in Section 7.0 Alternatives, the environmentally superior alternative to the proposed project is the No Project Alternative because all of the project's significant environmental impacts would be avoided. In addition to the No Project Alternative, the No Project – Existing Zoning Alternative would be an environmentally superior alternative.

¹ A smaller portion of the of the site in the northwest corner (Parcel A Development project) is zoned to PD-31A. The PD-31A zoning was specifically created to allow for the Parcel A Development project, which will construct 122 multifamily units. Since this project is already approved and under construction, the remainder of the project site would be developed consistent with the PD-31 zoning.

Areas of Concern

Environmental concerns expressed thus far from local residents, property owners, organizations, and/or agencies about the project include the following:

- Air quality impacts
- Biological impacts (nesting birds, wetlands, trees)
- Tribal and cultural resources
- School impacts
- Airport safety
- Project-generated traffic on roadway and freeway capacity
- Bicycle/Pedestrian impacts
- Required connections to existing utilities infrastructure and needed improvements
- Loss of an informal community garden space

SECTION 1.0 INTRODUCTION

1.1 PURPOSE OF THE ENVIRONMENTAL IMPACT REPORT

The City of Daly City, as the Lead Agency, has prepared this Draft Environmental Impact Report (EIR) for the Serramonte Del Rey Campus Redevelopment project in compliance with the California Environmental Quality Act (CEQA) and the CEQA Guidelines.²

As described in CEQA Guidelines Section 15121(a), an EIR is an informational document that assesses potential environmental impacts of a proposed project, as well as identifies mitigation measures and alternatives to the proposed project that could reduce or avoid adverse environmental impacts (CEQA Guidelines 15121(a)). As the CEQA Lead Agency for this project, the City of Daly City is required to consider the information in the EIR along with any other available information in deciding whether to approve the project. The basic requirements for an EIR include discussions of the environmental setting, significant environmental impacts including growth-inducing impacts, cumulative impacts, mitigation measures, and alternatives. It is not the intent of an EIR to recommend either approval or denial of a project.

1.2 EIR PROCESS

1.2.1 Notice of Preparation and Scoping

In accordance with Section 15082 of the CEQA Guidelines, the City of Daly City prepared a Notice of Preparation (NOP) for this EIR. The NOP was circulated locally on May 7, 2021 and the standard 30-day comment period concluded on June 7, 2021. The NOP was circulated to state and federal agencies through the State Clearinghouse on June 21, 2023 and the 30-day comment period concluded on July 21, 2023. The NOP provided a general description of the proposed project and identified possible environmental impacts that could result from implementation of the project. City of Daly City also held a public scoping meeting on May 19, 2021 to discuss the project and solicit public input as to the scope and contents of this EIR. The meeting was held virtually through a video conference call due to COVID-19 restrictions. Appendix A of this EIR includes the NOP and comments received on the NOP.

1.2.2 Draft EIR Public Review and Comment Period

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

² The project site is owned and operated by the Jefferson Union High School District; however, since the project is proposing residential and commercial uses and not educational facilities, the City of Daly City is considered the Lead Agency for the project.

Michael Van Lonkhuysen, Planning Manager
City of Daly City – Planning Division
333 90th Street
Daly City, CA 94015
mvanlonkhuysen@dalycity.org

1.3 FINAL EIR/RESPONSES TO COMMENTS

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

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

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.

1.3.1 Notice of Determination

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

SECTION 2.0 PROJECT INFORMATION AND DESCRIPTION

2.1 PROJECT LOCATION

The approximately 22-acre project site is located on the south side of Serramonte Boulevard between the intersections of Callan Boulevard/Serramonte Boulevard and St. Francis Boulevard/Serramonte Boulevard in the City of Daly City (APN 091-211-230). The majority of the project site has a General Plan land use designation of C-O (Commercial – Office) and is zoned PD-31 (Planned Development District) while a smaller portion of the site in the northwest corner was rezoned to PD-31A for a faculty and staff housing project that has been constructed and now is occupied and has a General Plan land use designation of R-HD (Residential-High Density). Regional, vicinity, and aerial maps of the project site are provided in Figure 2.2-1, Figure 2.2-2, Figure 2.2-3, and Figure 2.2-4, respectively.

2.2 PROJECT DESCRIPTION

The project consists of two primary components: (1) development of a new approximately 22-acre Serramonte Del Rey Precise Plan (Precise Plan), and (2) a specific development proposal for the approximately 4.3-acre Parcel B within a portion of the new Precise Plan.

2.2.1 Precise Plan

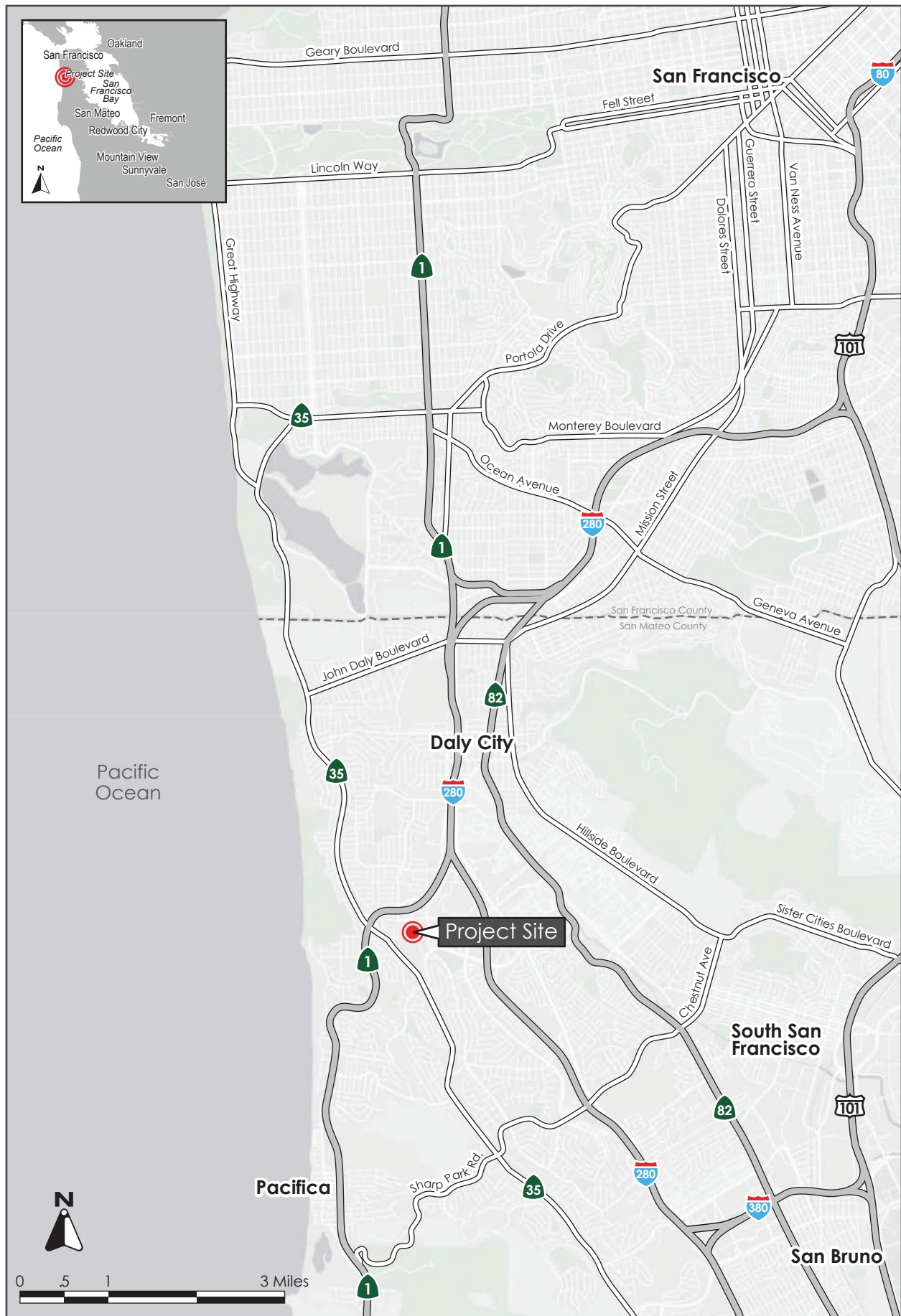
A Precise Plan was approved in 1985 for an approximately 50-acre area that includes the project site and extends south to Hickey Boulevard. Phase I of the 1985 Precise Plan has already been built and includes the apartment buildings, Summit Shasta High School, and office buildings located south of the project site along Campus Drive (see Figure 2.2-3). Phase II of the 1985 Precise Plan would redevelop the approximately 22-acre project site up to 175 residential units and approximately 700,000 square feet of office space. The proposed Precise Plan would replace Phase II of the 1985 Precise Plan for the approximately 22-acre project site and would leave the original Precise Plan in place for the portion outside of the project site. The zoning and General Plan land use designation of the portion outside of the project site would also remain as-is.

This EIR provides project-level environmental review for the full buildout of the Precise Plan as described below. The City will review future project applications at the time specific development is proposed on each Parcel to ensure each proposed project is consistent with the development assumptions analyzed in this EIR. The new Precise Plan would allow for the redevelopment of the project site area with up to 1,235 units (which includes the existing 122 units on Parcel A) of affordable and market-rate rental housing, up to 14,000 square feet of neighborhood-serving retail/commercial uses (in addition to 2,400 square feet for a Head Start childcare facility), and infrastructure improvements throughout the project area. Compared to the existing approved plan, the proposal would result in a net increase of 1,060 residential units and the elimination of planned office space.³ The new Precise Plan would require a General Plan Amendment from C-O (Commercial – Office) to C-MU (Commercial – Mixed Use). Table 2.2-1 below summarizes the proposed maximum development allowed per parcel, although the overall Precise Plan development totals would be as noted above, and less than the sum of what is possible on each parcel.

³ The total residential units in the proposed Precise Plan is inclusive of the already approved faculty and staff housing project located on Parcel A. 1,235 units – 175 units = 1,060 units.

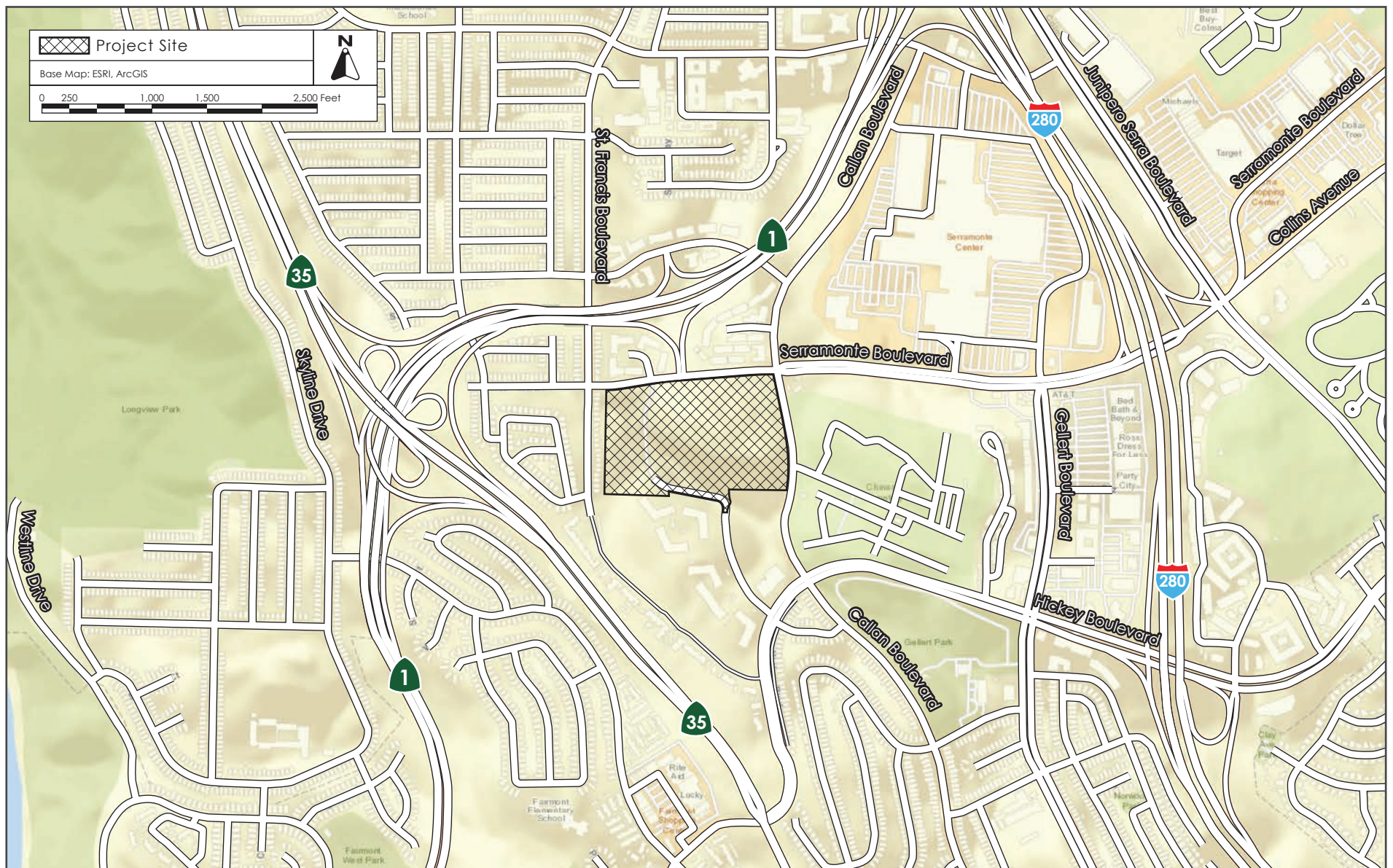
Table 2.2-1: Development Maximum Per Parcel		
Parcel Number	Maximum Residential Units¹	Maximum Retail/Commercial (square feet)³
Parcel A ²	122	0
Parcel B	210	8,000
Parcel C ⁵	125	6,000 ⁴
Parcel D	270	6,000
Parcel E	330	6,000
Parcel F	400	6,000
1. Shows maximum residential units per parcel; however, the total amount of residential units across all parcels shall not exceed 1,235 units. 2. Parcel A has been constructed and occupied and was approved under a separate application 3. Parcels C-F may provide retail/commercial space in addition to the 8,000 square feet assumed for Parcel B; however, the total amount across all parcels shall not exceed 14,000 square feet 4. Parcel C is permitted to build up to 1,400 square feet of childcare facilities in addition to the overall retail/commercial square footage 5. Parcel C would be subdivided into two parcels (C1 and C2)		

The proposed Precise Plan would divide the project site into six development parcels (with Parcel C further subdivided into two smaller parcels) and additional street parcels with public access easements (see Figure 2.2-5). Parcels A, B, and C would have maximum building heights of 77 feet, and Parcels D, E, and F would have a maximum building height of 150 feet. The 1985 Precise Plan allowed for 12-story building within the center of the project site, six-story buildings along the eastern property line, and 3.5-story buildings along the western property line. Build-out of the site and division of parcels is anticipated to be over an eight to 12 year period, but potentially up to 15 years. The proposed phasing for the Precise Plan is development of Parcel B first, followed by Parcels C and D, and finally Parcels E and F, although the phasing order may be adjusted by market conditions or other factors. The proposed Precise Plan would also establish a new Planned Development District, consistent with the City's Municipal Code Chapter 17.28. A copy of the proposed Precise Plan is included in Appendix B.



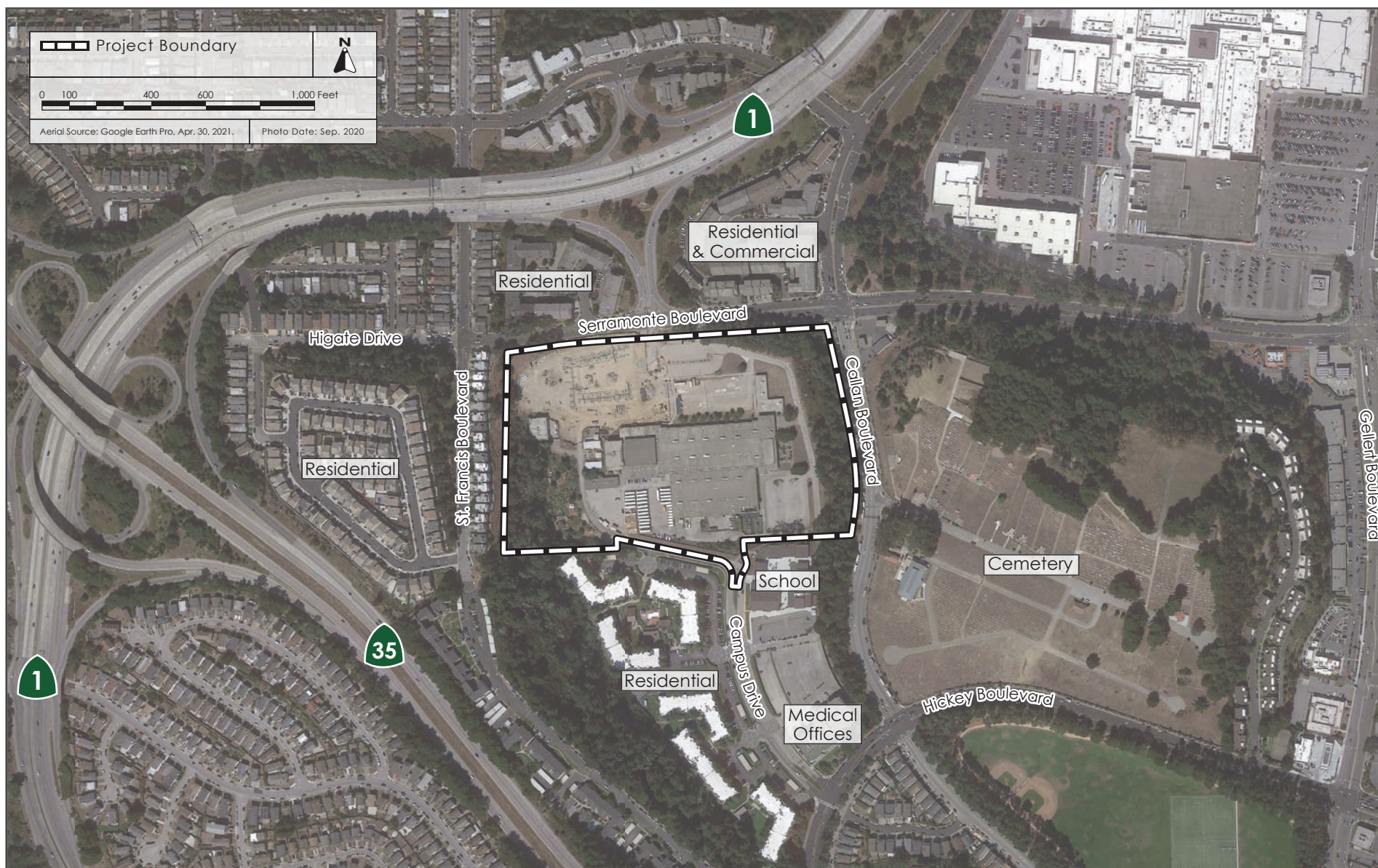
REGIONAL MAP

FIGURE 2.2-1



VICINITY MAP

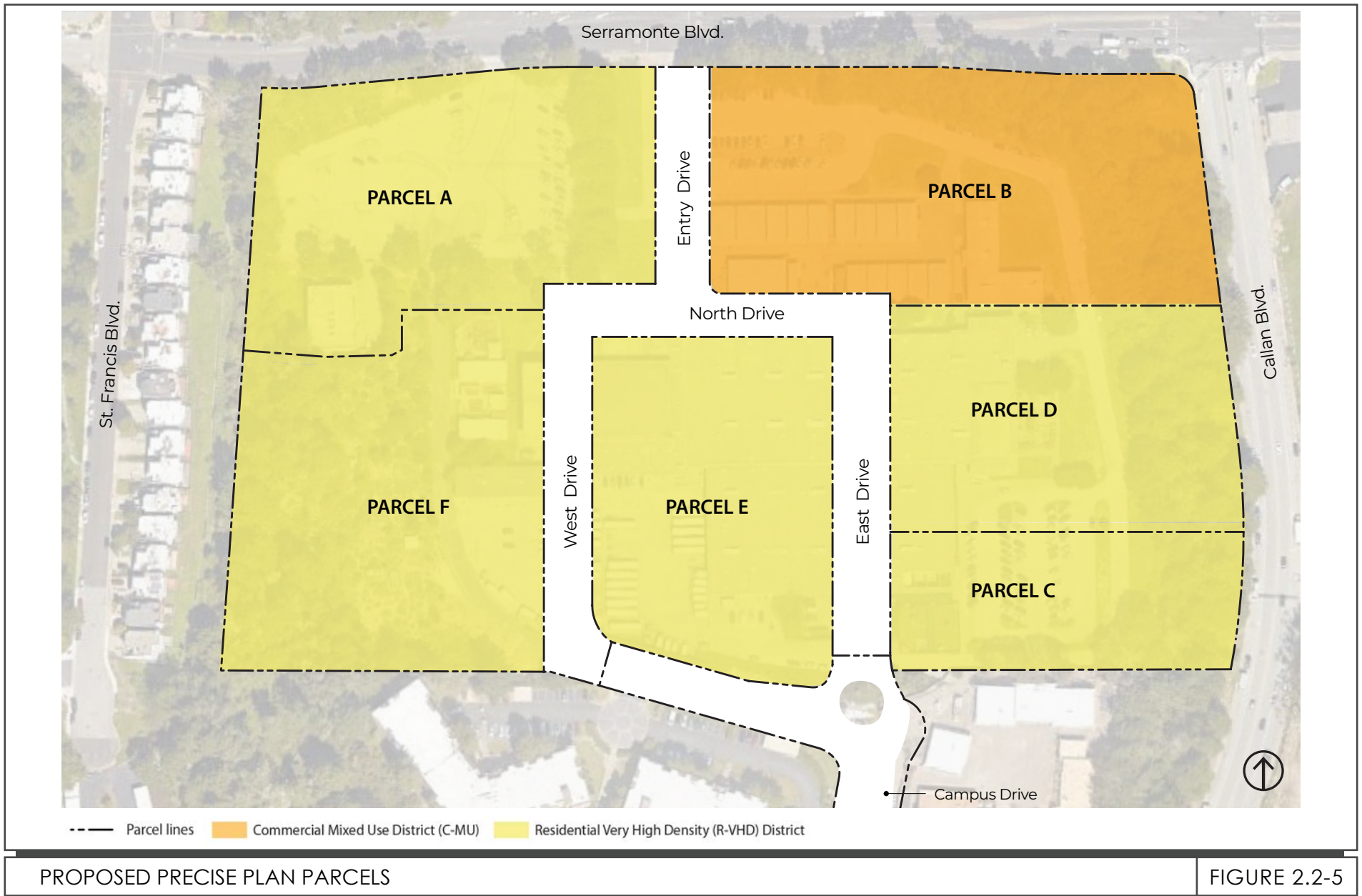
FIGURE 2.2-2



AERIAL PHOTOGRAPH AND SURROUNDING LAND USES

FIGURE 2.2-3





2.2.1.1 *Serramonte Del Rey Demonstration Garden*

There is an approximately 0.5-acre school demonstration garden located in the southwest corner of the Precise Plan area. This garden was started 20 years ago and used by JUHSD for adult education as a demonstration garden. In 2019, the garden was listed as a “community garden” by the County of San Mateo; however, the listing occurred without the knowledge or permission of JUHSD leadership, and therefore the garden was removed from the list. Since the garden is intended for use by JUHSD for educational purposes, JUHSD provides limited access for members of the public and is restricting hours of use during the interim period of campus utilization prior to the start of construction of Parcel B and the demolition of the existing high school building.

The proposed Precise Plan would remove the existing garden and use the space as a construction staging area until Parcel F is fully developed with up to 400 units and 6,000 square feet of retail uses. JUHSD is providing raised planter beds at their new adult education building located at 123 Edgemont Drive, which was approved by the JUHSD Board on August 17, 2021 (see Figure 2.2-6).

2.2.1.2 *Parcel A Development Project*

The JUHSD Faculty and Staff Housing project is constructed and occupied on Parcel A of the proposed Precise Plan. The Parcel A development project was approved by the City of Daly City in January 2020 and consists of four-story (48 feet), 122 multi-family units for JUHSD faculty, staff, and their families on an approximately 3.9-acre site (see Figure 2.2-7). While the Parcel A development project was approved under a separate application, the 122 residential units are included in the proposed Precise Plan’s total unit count of 1,235.

2.2.2 Parcel B Development Project

The specific Parcel B development project would be located on the approximately 4.3-acre Parcel B, as shown in Figure 2.2-8. Parcel B is currently developed with surface parking and a one-story temporary education building in the southeast corner of the parcel.

The proposed development would demolish the existing building and surface parking on-site and construct a seven-story (up to 73.5 feet to top of parapet and 85 feet to top of elevator shaft, see Figure 2.2-9), mixed-use building with 201 residential units and approximately 8,000 square feet of retail space. The building would include two levels of parking (one level of below grade parking). The lower level of the parking garage would provide 212 parking spaces serving the residential units. An additional 133 parking spaces would be provided on the ground-floor, with 43 reserved for retail customers and leasing and the remainder reserved for residential parking.

2.2.2.1 *Site Access and Circulation*

Vehicular access to the Parcel B site would be provided via a new driveway and the existing entry drive on Serramonte Boulevard (see Figure 2.2-8). The new driveway would be located east of the existing entry drive and provide direct access to the lower parking level. An entry road would run north-south between Parcels A and B from the existing driveway along Serramonte Boulevard. An entrance to the proposed ground-floor parking (i.e. the upper level of the parking garage) would be located along this new road. A new road serving Parcels A and B would run west-east along the

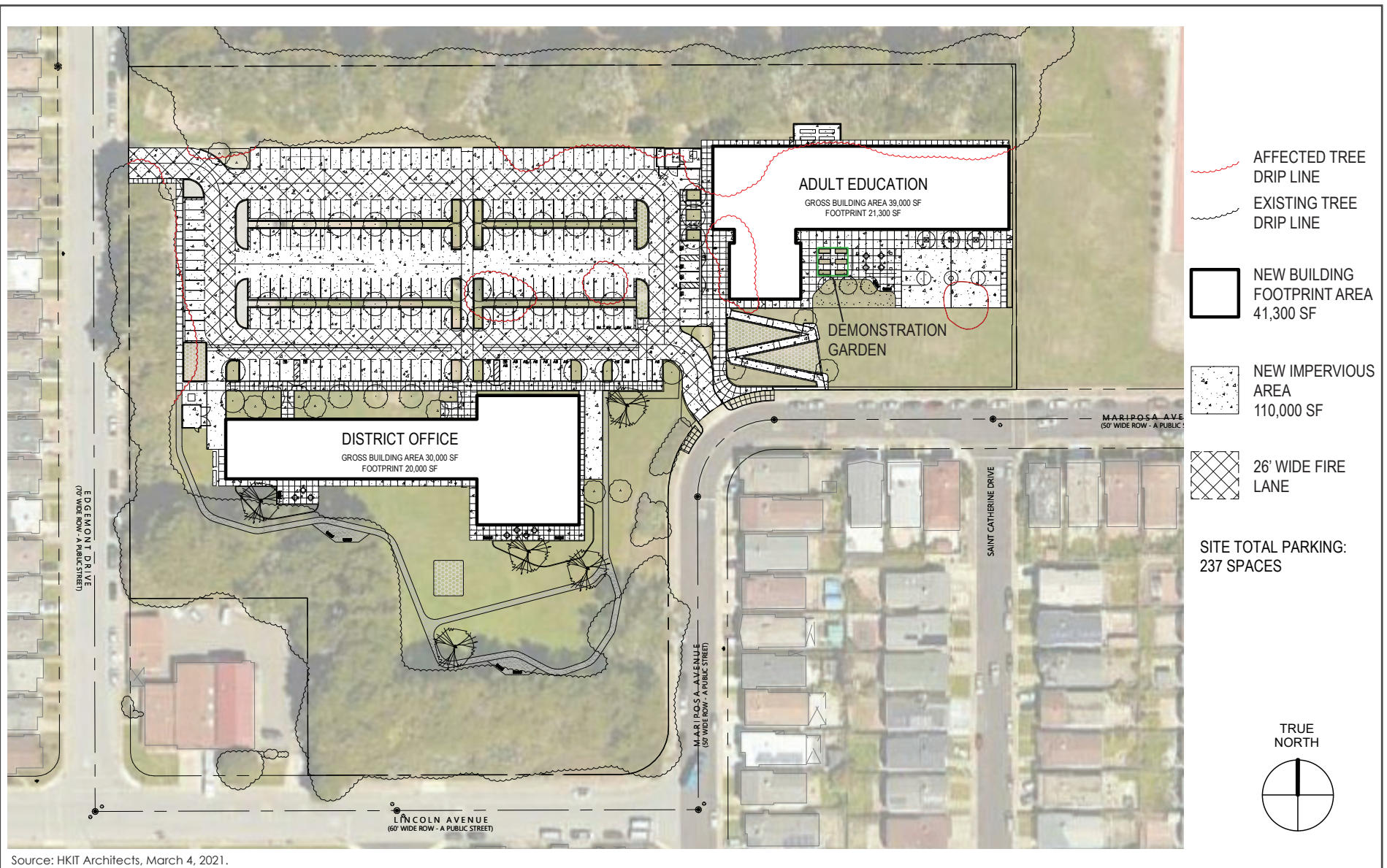
southern boundaries of Parcels A and B. A new multi-use pathway would be constructed around the perimeter of the proposed mixed-use building and Parcel B.

In addition to the proposed Parcel B development project's on-site transportation improvements (i.e., new roads, bike paths, and pedestrian paths), the City of Daly City and applicant are in discussions regarding potential additional transportation improvements that may be included in the project or possibly required as conditions of approval. Potential off-site improvements that the project may be required to construct include the following:

- Bicycle and pedestrian improvements on Campus Drive
- Serramonte Boulevard bicycle and pedestrian improvements
- Serramonte Boulevard/Highway 1 Traffic Signal
- Clarinada Avenue/Highway 1 Traffic Signal
- Sidewalk on Callan Boulevard
- Bicycle and pedestrian improvements within the proposed Precise Plan
- Improved access pathways to Gellert Park
- Serramonte Pavement Reconstruction
- Stormwater infrastructure

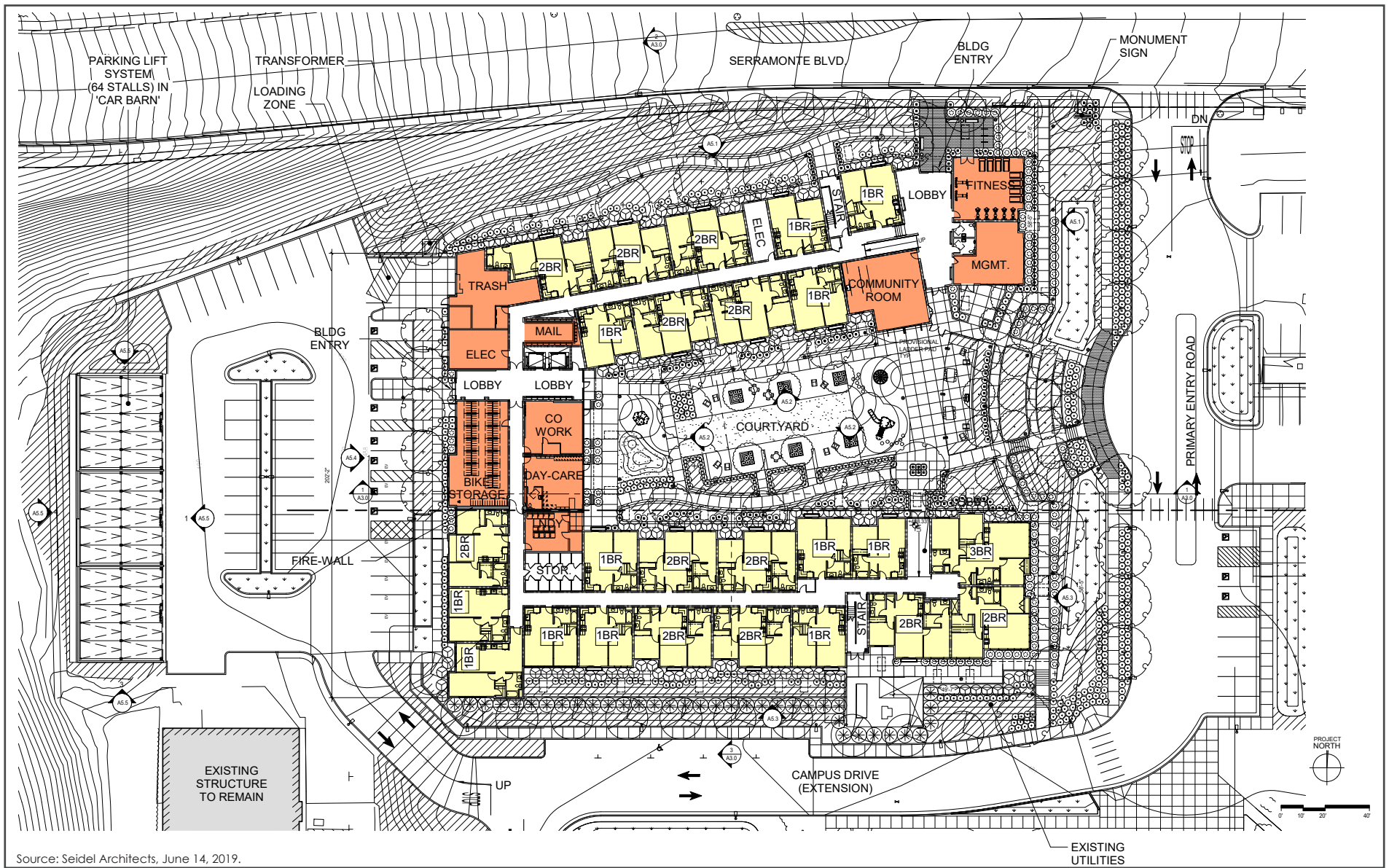
This EIR evaluates the potential implementation of the above improvements to ensure their environmental effects, if any, are disclosed and mitigated, where needed, to inform the City's decision whether to require some or all of the improvements to be implemented by the project. Any improvements ultimately to be implemented would be attached to the project as conditions of approval.

The development project would signalize the Serramonte Boulevard and project driveway intersection and add pedestrian improvements (i.e., crosswalks, pedestrian signals) to serve the future residents on Parcel B, as well as residents on constructed Parcel A. Intersections at St. Francis Boulevard/Serramonte Boulevard, St. Francis Boulevard/Callan Boulevard, Hickey Boulevard/Callan Boulevard, and Hickey Boulevard/Campus Drive would also be improved with new bike and pedestrian connections. New bike lanes and sidewalks would also be provided on Serramonte Boulevard along the project frontage and throughout the project site. Potential off-site improvements that the project may be required to construct in connection with Parcels C-F will be evaluated when they are identified and at the time the City completes the subsequent or supplemental environmental review pursuant to Guidelines Section 15162.



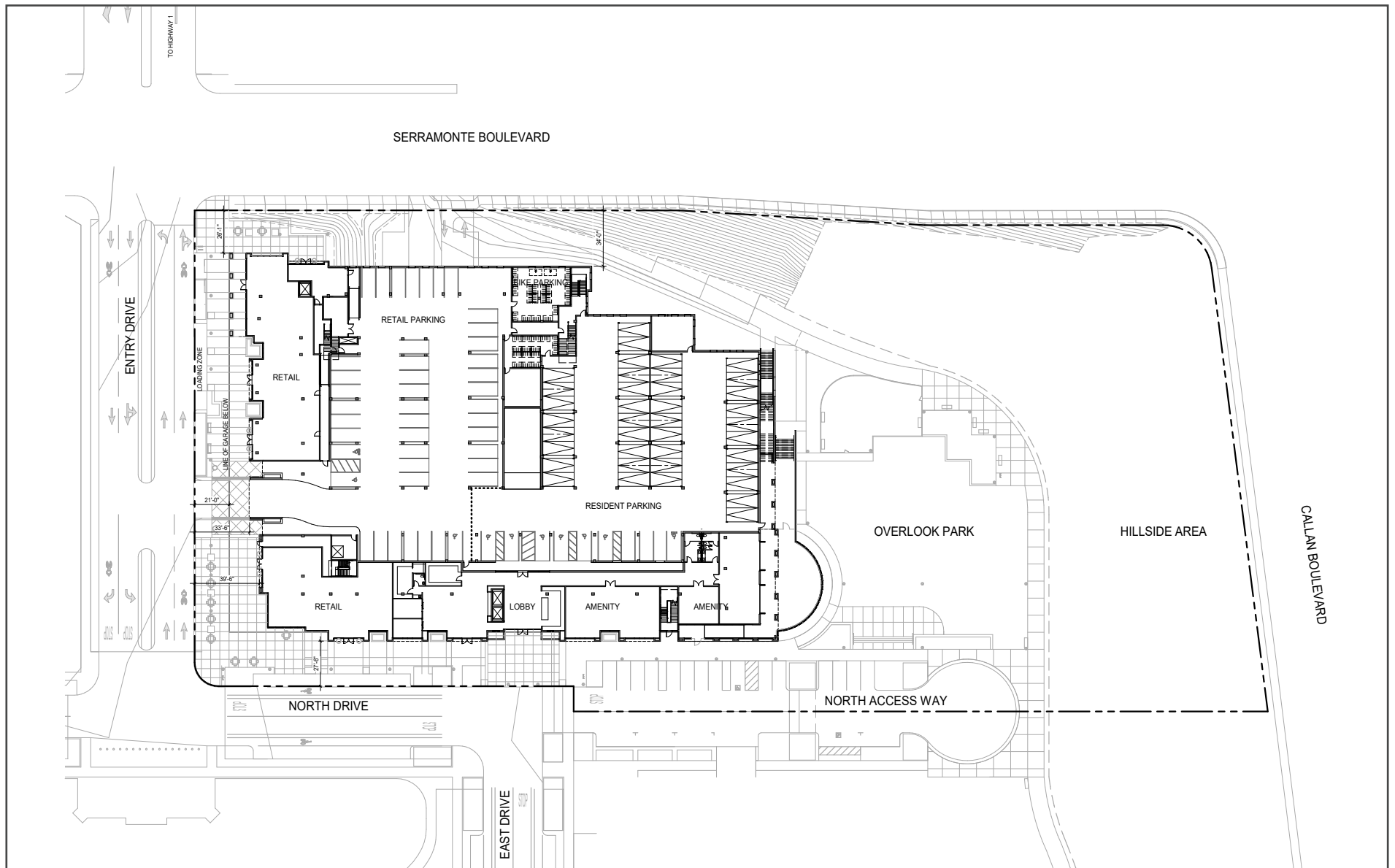
JHSD DISTRICT OFFICE AND ADULT EDUCATION SITE PLAN

FIGURE 2.2-6



PARCEL A DEVELOPMENT PROJECT SITE PLAN

FIGURE 2.2-7



PARCEL B CONCEPTUAL SITE PLAN

FIGURE 2.2-8



SOUTH ELEVATION (NORTH DRIVE)



WEST ELEVATION (ENTRY DRIVE)

Source: Seidel Architects, April 21, 2021.

2.2.2.2 *Open Space and Landscaping*

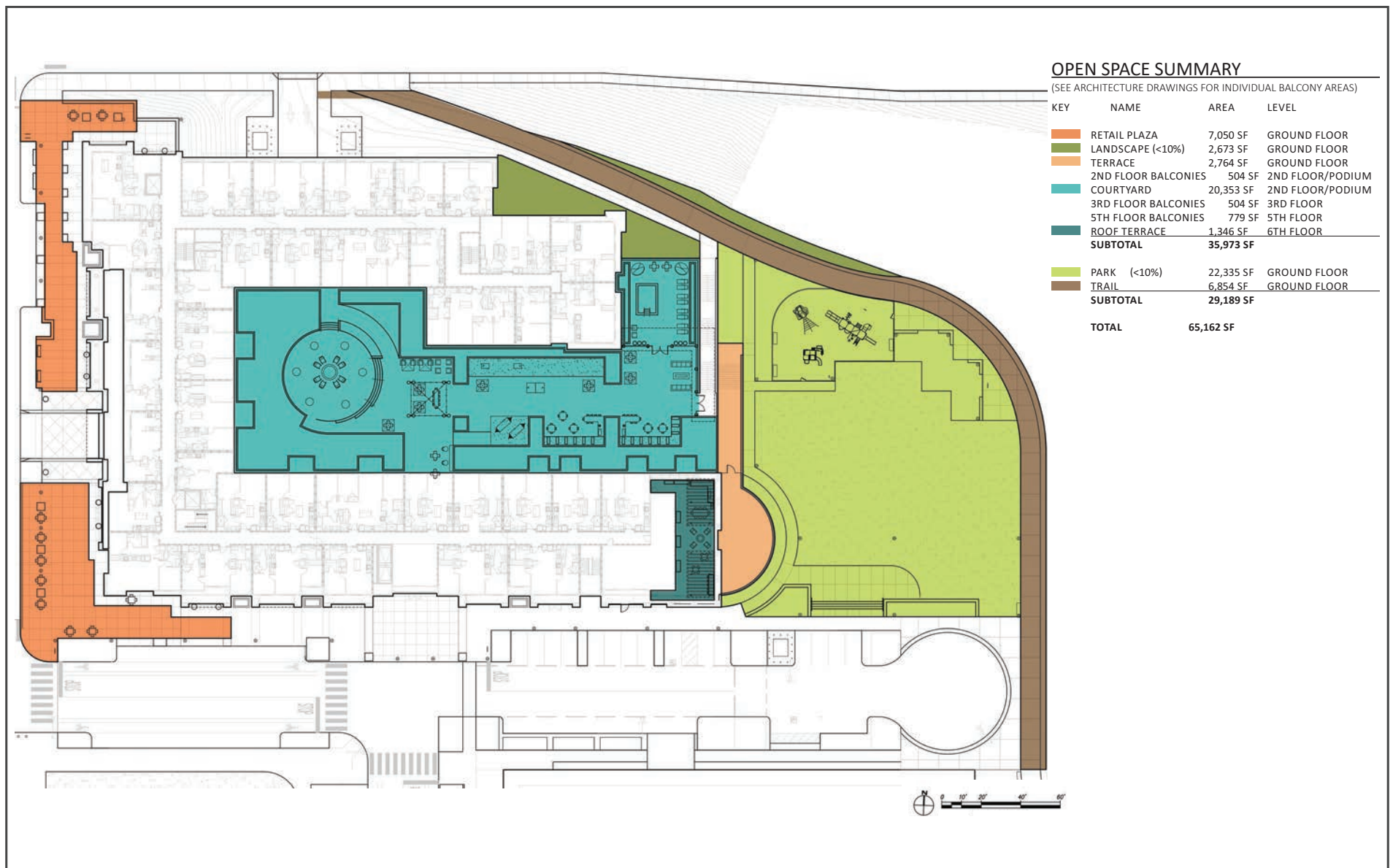
The proposed Parcel B development project would include three components of open space to be used by the public: 1) approximately 22,300 square-foot public park that would include a large grass area and playground; 2) the first phase of the recreational trail (approximately 6,800 square feet) that would be located in the southeast corner of Parcel B; and 3) open space for public use at the retail plaza (approximately 7,000 square feet) facing the new entry road (see Figure 2.2-10). Open space serving the residents of the building would include both the ground floor terrace and the roof terrace, up to 20 private balconies for individual units, and an approximately 20,300 square-foot courtyard located on the roof of the parking deck of the mixed-use building which includes amenities such as a hot tub, fire pit, lounge furniture, and an outdoor kitchen. The open space reserved for residential use plus the retail open space for public use at Parcel B would exceed the City's requirement for open space of 150 square feet per unit and is consistent with the proposed Precise Plan.

Parcel B currently contains limited landscaping consisting of grasses, shrubs, and trees within the existing surface parking lot and adjacent to the existing education building. Mature trees are located along the perimeter of Parcel B to the north and east. The proposed development would preserve the mature trees along the perimeter of Parcel B and replace the trees that are determined to be in poor condition by a certified arborist. The project proposes to plant 82 new trees throughout the project site.

2.2.2.3 *Utility, Drainage, and Off-Site Improvements*

The proposed Parcel B development project would connect to existing utilities within Serramonte Boulevard and the Precise Plan area itself. The Parcel B development project would connect to an existing 10-inch sanitary sewer line within Serramonte Boulevard and a 10-inch water line along the southern edge of Parcel B.

Stormwater would be treated on-site with area drains, drop inlets, manholes, bioretention areas, and below-grade pipes, before being discharged to a 24-inch storm drain line in Serramonte Boulevard. The project would treat stormwater before entering the city's storm drain system. In addition, an infiltration gallery is proposed to offset an increase in runoff generated from the proposed development.



PARCEL B CONCEPTUAL OPEN SPACE PLAN

FIGURE 2.2-10

2.2.2.4 Construction Schedule

Construction of the proposed Parcel B development project is expected to last approximately 24 months. As noted previously, full build out of the entire Precise Plan would take approximately eight-12 years, but could take up to 15 years. The proposed Parcel B development project would result in a net export of approximately 33,220 cubic yards (cy) of soil; however, the development project is proposing to store that soil on-site for use during development of the rest of the Precise Plan (i.e., Parcels C through F).

2.3 PROJECT OBJECTIVES

- Advance an innovative land use master plan to attract investment, stabilize District finances, increase funding for student education and attract and retain highly qualified teachers and staff.
- Permit development consistent with the City’s General Plan that enables redevelopment of underutilized properties with higher-density, transit supportive development that facilitates bicycle and pedestrian access along an established, highly utilized transit corridor, as outlined in the 2020 Walk Bike Daly City Master Plan.
- Create a pedestrian scale neighborhood with an attractive public realm of park and outdoor spaces, inviting to the surrounding community and people of all ages.
- Maximize the number of new high-quality market-rate and affordable housing units as a well-designed, economically feasible, urban residential neighborhood with sufficient density to create a safe, active neighborhood, with development phasing subject to market conditions that provides flexibility with the sequence of construction of buildings, open space, streets, and infrastructure.
- Create opportunities to connect people with nature through open space design, a new recreational trail and immediate proximity to wooded hillside areas.
- Encourage alternative transportation with safe on- and off-street bike routes and pedestrian-oriented urban design that encourages bicycle, pedestrian, and transit access to, from and through the site.
- Design traffic-calmed residential streets for low volume, slow vehicle access between the intersection of Highway 1 and Serramonte Boulevard and the existing Campus Drive south of the Plan Area.

2.4 USES OF THE EIR

This EIR provides decision makers in the City of Daly City, CalTrans (as a responsible agency) and the general public with environmental information to use in considering the proposed project. It is intended that this EIR be used for the discretionary approvals necessary to implement the project, as proposed. These discretionary actions may include, but are not limited to, the following:

City Actions

Precise Plan

- General Plan Amendment
- Planned Development Rezoning and Permit

- Major Subdivision
- Design Review for future development projects

Parcel B Development Project

- Design Review Permit

Ministerial permits would subsequently be obtained from the City, which could include demolition permits, grading permits, and building permits, in order to complete the projects and construct necessary infrastructure improvements, including any off-site improvements.

Caltrans Actions

- Encroachment Permit

SECTION 3.0 ENVIRONMENTAL SETTING, IMPACTS, AND MITIGATION

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

3.1	Aesthetics	3.11	Land Use and Planning
3.2	Agriculture and Forestry Resources	3.12	Mineral Resources
3.3	Air Quality	3.13	Noise
3.4	Biological Resources	3.14	Population and Housing
3.5	Cultural Resources	3.15	Public Services
3.6	Energy	3.16	Recreation
3.7	Geology and Soils	3.17	Transportation
3.8	Greenhouse Gas Emissions	3.18	Tribal Cultural Resources
3.9	Hazards and Hazardous Materials	3.19	Utilities and Service Systems
3.10	Hydrology and Water Quality	3.20	Wildfire

The discussion for each environmental subject includes the following subsections:

Environmental Setting – This subsection 1) provides a brief overview of relevant plans, policies, and regulations that compose the regulatory framework for the project and 2) describes the existing, physical environmental conditions at the project site and in the surrounding area, as relevant.

Impact Discussion – This subsection includes the recommended checklist questions from Appendix G of the CEQA Guidelines to assess impacts.

- **Project Impacts** – This subsection discusses the project’s impact on the environmental subject as related to the checklist questions. For significant impacts, feasible mitigation measures are identified. “Mitigation measures” are measures that will minimize, avoid, or eliminate a significant impact (CEQA Guidelines Section 15370). Each impact is numbered to correspond to the checklist question being answered. For example, Impact BIO-1 answers the first checklist question in the Biological Resources section. Mitigation measures are also numbered to correspond to the impact they address. For example, MM BIO-1.3 refers to the third mitigation measure for the first impact in the Biological Resources section.
- **Cumulative Impacts** – This subsection discusses the project’s cumulative impact on the environmental subject. Cumulative impacts, as defined by CEQA, refer to two or more individual effects, which when combined, compound or increase other environmental impacts. Cumulative impacts may result from individually minor, but collectively significant effects taking place over a period of time. CEQA Guideline Section 15130 states that an EIR should discuss cumulative impacts “when the project’s incremental effect is cumulatively considerable.” The discussion does not need to be in as great detail as is necessary for project impacts, but is to be “guided by the standards of practicality and reasonableness.” The purpose of the cumulative analysis is to allow decision makers to better understand the

impacts that might result from approval of past, present, and reasonably foreseeable future projects, in conjunction with the proposed project addressed in this EIR.

The CEQA Guidelines advise that a discussion of cumulative impacts should reflect both their severity and the likelihood of their occurrence (CEQA Guidelines Section 15130(b)). To accomplish these two objectives, the analysis should include either a list of past, present, and probable future projects or a summary of projections from an adopted general plan or similar document (CEQA Guidelines Section 15130(b)(1)). This EIR uses the list of projects approach.

The analysis must determine whether the project's contribution to any cumulatively significant impact is cumulatively considerable, as defined by CEQA Guideline Section 15065(a)(3). The cumulative impacts discussion for each environmental issue accordingly addresses the following issues: 1) would the effects of all of past, present, and probable future (pending) development result in a significant cumulative impact on the resource in question; and, if that cumulative impact is likely to be significant, 2) would the contribution from the proposed project to that significant cumulative impact be cumulatively considerable?

Table 3.0-1 identifies the approved (but not yet constructed or occupied) and pending projects in the project vicinity that are evaluated in the cumulative analysis.

Table 3.0-1: Cumulative Projects List			
Name	Address	Description	Status
Serramonte Shopping Center Expansion – Northwest Quadrant	3 Serramonte Center, Daly City	70,000 sq. ft. Cinema, 75,000 sq. ft. Hotel, 28,000 sq. ft. Retail, 12,000 sq. ft. Restaurants	Approved
Serramonte Shopping Center Expansion – Northeast Quadrant	3 Serramonte Center, Daly City	Two drive-through restaurants (5,100 sq. ft. and 2,100 sq. ft.)	Under Construction
Seton Medical Center Expansion	1900 Sullivan Avenue, Daly City	Four hospital buildings totaling 433,385 sq. ft. of new hospital space. Overall net increase of 200,385 sq. ft. of building space	Under Construction
Serramonte Condominiums	525-595 Serramonte Boulevard, Daly City	323 total units - 17-story 133-unit 170,164 GSF condo building and two 13-story 95-unit 181,806 GSF condo buildings	Approved
Serramonte Hotel	525-595 Serramonte Boulevard, Daly City	12-story, 176-room 153,886 GSF hotel	Approved

For each resource area, cumulative impacts may occur over different geographic areas. For example, the project effects on air quality would combine with the effects of projects in the entire air basin, whereas noise impacts would primarily be localized to the surrounding area. The geographic area that could be affected by the proposed project varies depending upon the type of environmental issue being considered. Section 15130(b)(3) of the CEQA Guidelines states that lead agencies should define the geographic scope of the area affected by the cumulative effect. Table 3.0-2 provides a summary of the different geographic areas used to evaluate cumulative impacts.

Table 3.0-2: Geographic Considerations in Cumulative Analysis	
Resource Area	Geographic Area
Aesthetics	Project site and adjacent parcels
Agriculture and Forestry Resources	Countywide
Air Quality	San Francisco Bay Area Air Basin
Biological Resources	Project site and adjacent parcels
Cultural Resources	Project site and adjacent parcels
Energy	Energy provider's territory
Geology and Soils	Project site and adjacent parcels
GHGs	Planet-wide
Hazards and Hazardous Materials	Project site and adjacent parcels
Hydrology and Water Quality	Colma Creek watershed
Land Use and Planning/Population and Housing	Citywide
Minerals	Identified mineral recovery or resource area
Noise and Vibration	Project site and adjacent parcels
Public Services and Recreation	Citywide
Transportation/Traffic	Citywide
Tribal Cultural Resources	Project site and adjacent parcels
Utilities and Service Systems	Citywide
Wildfire	Within or adjacent to the wildfire hazard zone

3.1 AESTHETICS

3.1.1 Environmental Setting

3.1.1.1 *Regulatory Framework*

State

Senate Bill 743

Senate Bill (SB) 743 was adopted in 2013 and, among other changes, SB 743 specifies that aesthetic impacts of qualifying transit oriented developments are not considered significant impacts on the environment if:

1. The project is a residential, mixed-use residential, or employment center project, and
2. The project is located on an infill site within a transit priority area.⁴

The exemption for aesthetic impacts does not include impacts to historic or cultural resources, however. In addition, local governments retain their ability to regulate a project's transportation, aesthetics, and parking impacts outside of the CEQA process.

Scenic Highways Program

The California Scenic Highway Program is managed by the California Department of Transportation (Caltrans). The program is intended to protect and enhance the natural scenic beauty of California highways and adjacent corridors through special conservation treatment. State laws governing the Scenic Highway Program are found in the Streets and Highway Code, Sections 260 through 263. There are three eligible State scenic highways within the City of Daly City, although none are officially designated; Skyline Boulevard (State Route (SR) 35), Cabrillo Highway (SR 1), and Junipero Serra (I-280).

Local

Daly City 2030 General Plan

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

⁴ An "infill site" is defined as "a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses." A "transit priority area" is defined as "an area 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 adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." A "major transit stop" means "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." Source: Office of Planning and Research. "Changes to CEQA for Transit Oriented Development – FAQ." October 14, 2014. Accessed: August 24, 2021. <http://www.opr.ca.gov/ceqa/updates/sb-743/transit-oriented.html>.

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

3.1.1.2 *Existing Conditions*

Project Site

The 22-acre project site is located on the south side of Serramonte Boulevard between the intersections of Callan Boulevard/Serramonte Boulevard and St. Francis Boulevard/Serramonte Boulevard (see Figure 2.2-3). The northwest corner of the project site (Parcel A) is developed with the Jefferson Union High School District (JUHSD) Faculty and Staff Housing project. The northeast corner of the project site (Parcel B) is currently developed with a surface parking lot and portable building units (see Photo 1). The southwest corner of the project site is developed with the JUHSD demonstration garden (see Photo 2). The remainder of the project site is developed with surface parking lots and a one- to two-story concrete building that serves as the existing JUHSD district office and adult education buildings (see Photo 3). The project site meets the definition of an infill site per SB 743.

Surrounding Visual Character

The project site is surrounded by residential development to the north, northeast, south, and west. The residences to the north and northeast are two- to three-story apartment buildings made of stucco and wood construction. The residences to the south (Serramonte Ridge Apartment Homes) are three- to four-story apartment buildings also made of stucco and wood construction. The residences to the west are two-story, single-family homes made of wood construction (see Photo 4).

Southeast of the project site is the Summit Shasta High School, which is developed with one- to two-story concrete education buildings (see Photo 4). East of the project site across Callan Boulevard is a Chinese cemetery consisting of mostly open space and gravestones.



Photo 1: View from Serramonte Boulevard looking south.



Photo 2: View of Demonstration Garden looking northwest.



Photo 3: View of administration building looking north.



Photo 4: View looking south of project site down Campus Drive.

Scenic Vistas and Resources

San Bruno Mountain reaches approximately 1,000 feet in elevation and is visible from various locations throughout the City, including the project site, which is about a 2.6 miles southwest of San Bruno Mountain. Views of the coastline are not visible from the project site. The project site is comprised of surface parking lots and commercial buildings and no scenic resources, such as rock outcroppings or historic buildings (refer to Section 4.5 Cultural Resources), are present on the site or in the project area, other than numerous mature trees. The project site is not visible from any state or County designated scenic highways or roadways.

Locations within a Transit Priority Area

The project site is located within a transit priority area as defined in SB 743. The Serramonte Shopping Center bus stop, and the multiple bus lines serving that location, qualifies as a major transit stop and the project site is within one-half mile (see Figure 3.1-1).

3.1.2 Impact Discussion

For the purpose of determining the significance of the project's impact on aesthetics, except as provided in Public Resources Code Section 21099, would the project:

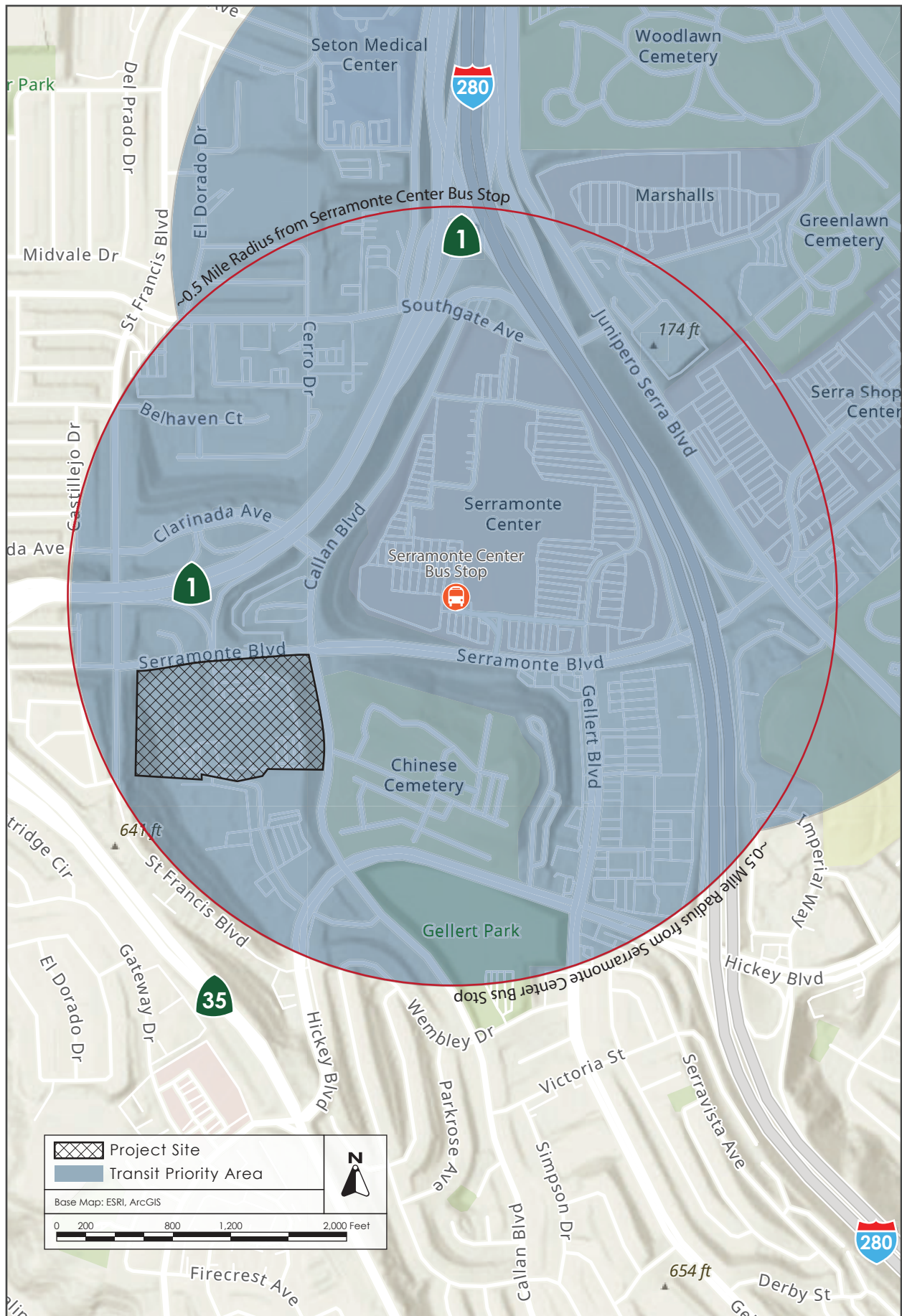
- 1) Have a substantial adverse effect on a scenic vista?
- 2) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?
- 3) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings?⁵ If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?
- 4) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

3.1.2.1 *Project Impacts*

Impact AES-1:	The project would not have a substantial adverse effect on a scenic vista. (Less than Significant Impact)
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Implementation of the project would result in changes to the built environment; however, the proposed project would consist of mixed-use residential land uses and is located on an infill site within a transit priority area. Pursuant to SB 743 (Public Resources Code section 21099[d][1]) "aesthetic and parking impacts of a residential, mixed-use residential, or employment center on an infill site within a transit priority area shall not be considered significant impacts on the environment;" therefore, the aesthetics impacts of the project are not considered significant. **(Less than Significant Impact)**

⁵ Public views are those that are experienced from publicly accessible vantage points.



TRANSIT PRIORITY AREA

FIGURE 3.1-1

3.1.2.2 *Cumulative Impacts*

Impact AES-C: The project would not result in a cumulatively considerable contribution to a cumulatively significant aesthetics impact. **(Less than Significant Cumulative Impact)**

Precise Plan and Parcel B Development Project

By statute, the project's aesthetic impacts, individually and cumulatively, are deemed less than significant, see Impact AES-1 discussion above. **(Less than Significant Cumulative Impact)**

3.2 AGRICULTURE AND FORESTRY RESOURCES

3.2.1 Environmental Setting

3.2.1.1 *Regulatory Framework*

State

Farmland Mapping and Monitoring Program

The California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP) assesses the location, quality, and quantity of agricultural land and conversion of these lands over time. Agricultural land is rated according to soil quality and irrigation status. The best quality land is identified as Prime Farmland. In CEQA analyses, the FMMP classifications and published county maps are used, in part, to identify whether agricultural resources that could be affected are present on-site or in the project area.⁶

California Land Conservation Act

The California Land Conservation Act (Williamson Act) enables local governments to enter into contracts with private landowners to restrict parcels of land to agricultural or related open space uses. In return, landowners receive lower property tax assessments. In CEQA analyses, identification of properties that are under a Williamson Act contract is used to also identify sites that may contain agricultural resources or are zoned for agricultural uses.⁷

Fire and Resource Assessment Program

The California Department of Forestry and Fire Protection (CAL FIRE) identifies forest land, timberland, and lands zoned for timberland production that can (or do) support forestry resources.⁸ Programs such as CAL FIRE's Fire and Resource Assessment Program and are used to identify whether forest land, timberland, or timberland production areas that could be affected are located on or adjacent to a project site.⁹

3.2.1.2 *Existing Conditions*

The approximately 22-acre project site is not used for agricultural or timberland purposes. A demonstration garden is located in the southwest corner of the project site (see Photo 2); however, this garden is not considered an agricultural resource under CEQA as it does not meet the definition

⁶ California Department of Conservation. "Farmland Mapping and Monitoring Program." Accessed December 6, 2021. <http://www.conservation.ca.gov/dlrp/fmmp/Pages/Index.aspx>.

⁷ California Department of Conservation. "Williamson Act." <http://www.conservation.ca.gov/dlrp/lca>.

⁸ Forest Land is land that can support 10 percent native tree cover and allows for management of forest resources (California Public Resources Code Section 12220(g)); Timberland is land not owned by the federal government or designated as experimental forest land that is available for, and capable of, growing trees to produce lumber and other products, including Christmas trees (California Public Resources Code Section 4526); and Timberland Production is land used for growing and harvesting timber and compatible uses (Government Code Section 51104(g)).

⁹ California Department of Forestry and Fire Protection. "Fire and Resource Assessment Program." Accessed December 6, 2021. <http://frap.fire.ca.gov/>.

of agricultural land.¹⁰ Surrounding land uses include residences to the north, west, and south, a shopping mall to the northeast, and a cemetery and park to the east. The San Mateo County Important Farmlands 2018 Map designates the project site as “Urban and Built-Up Land”, defined as land with at least six structures per 10 acres. Common examples of “Urban and Built-Up Land” are residential, institutional, industrial, commercial, landfill, golf course, airports, and other utility uses. The site is not under a Williamson Act contract and there are no existing agricultural or forestry resources on or in the vicinity of the site.

The project site is zoned as a Planned Development. A Planned Development district allows various types of development such as neighborhood shopping centers, professional and administrative areas, commercial service centers, industrial parks, single-family, multi-family residential, or a combination of any of the above-mentioned uses.

3.2.2 Impact Discussion

For the purpose of determining the significance of the project’s impact on agriculture and forestry resources, would the project:

- 1) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?
- 2) Conflict with existing zoning for agricultural use, or a Williamson Act contract?
- 3) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?
- 4) Result in a loss of forest land or conversion of forest land to non-forest use?
- 5) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

3.2.2.1 *Project Impacts*

Impact AG-1:	The project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use. (No Impact)
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As discussed under Section 3.2.1.2, the project site is not designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, the project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. **(No Impact)**

¹⁰ Agricultural land is means prime farmland, farmland of statewide importance, or unique farmland, as defined by the United States Department of Agriculture land inventory and monitoring criteria, as modified for California (California Public Resources Code Section 21060.1).

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

As discussed under Section 3.2.1.2, the project site is neither zoned for agricultural use or under a Williamson Act contract; therefore, the proposed project would not conflict with zoning for agricultural uses or a Williamson Act contract. **(No Impact)**

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

As discussed under Section 3.2.1.2, the project site is not zoned as timberland or forest land. For this reason, the project would have not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production. **(No Impact)**

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

See response to Impact AG-3. **(No Impact)**

Impact AG-5: The project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use. **(No Impact)**

See responses to Impact AG-1 through Impact AG-4. In addition, as discussed above in Section 3.2.1.2 Existing Conditions, the demonstration garden on the project site is not considered an agricultural resource and its removal would not result in a significant impact. The school district, however, is providing a substitute demonstration garden at their new district offices next to Westmoor High School (see Section 2.2.1.1 for more details). **(No Impact)**

3.2.2.2 Cumulative Impacts

Impact AG-C: The project would not result in a cumulatively considerable contribution to a cumulatively significant agricultural and forestry resources impact. **(No Cumulative Impact)**

As discussed above, the implementation of the proposed project would not impact agricultural, forestry, and/or timberland; therefore, implementation of the project would not contribute to a cumulative impact to those resources. **(No Cumulative Impact)**

3.3 AIR QUALITY

The following discussion is based, in part, on an air quality and greenhouse gas assessment prepared for the project by Illingworth & Rodkin, Inc. A copy of this report, dated June 17, 2022, is attached to this EIR as Appendix C.

3.3.1 Environmental Setting

3.3.1.1 *Background Information*

Criteria Pollutants

Air quality in the Bay Area is assessed related to six common air pollutants (referred to as criteria pollutants), including ground-level ozone (O₃), nitrogen oxides (NO_x), particulate matter (PM), carbon monoxide (CO), sulfur oxides (SO_x), and lead.¹¹ Criteria pollutants are regulated because they result in health effects. An overview of the sources of criteria pollutants and their associated health effects are summarized in Table 3.3-1. The most commonly regulated criteria pollutants in the Bay Area are discussed further below.

Table 3.3-1: Health Effects of Air Pollutants		
Pollutants	Sources	Primary Effects
Ozone (O ₃)	Atmospheric reaction of organic gases with nitrogen oxides in sunlight	• Aggravation of respiratory and cardiovascular diseases • Irritation of eyes • Cardiopulmonary function impairment
Nitrogen Dioxide (NO ₂)	Motor vehicle exhaust, high temperature stationary combustion, atmospheric reactions	• Aggravation of respiratory illness • Reduced visibility
Fine Particulate Matter (PM _{2.5}) and Coarse Particulate Matter (PM ₁₀)	Stationary combustion of solid fuels, construction activities, industrial processes, atmospheric chemical reactions	• Reduced lung function, especially in children • Aggravation of respiratory and cardiorespiratory diseases • Increased cough and chest discomfort • Reduced visibility
Toxic Air Contaminants (TACs)	Cars and trucks, especially diesel-fueled; industrial sources, such as chrome platers; dry cleaners and service stations; building materials and products	• Cancer • Chronic eye, lung, or skin irritation • Neurological and reproductive disorders

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

¹¹ The area has attained both state and federal ambient air quality standards for CO. The project does not include substantial new emissions of sulfur dioxide or lead. These criteria pollutants are not discussed further.

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

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

Toxic Air Contaminants

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

Diesel exhaust is the predominant TAC in urban air and is estimated to represent about three-quarters of the cancer risk from TACs. Diesel exhaust is a complex mixture of gases, vapors, and fine particles. Medium- and heavy-duty diesel trucks represent the bulk of DPM emissions from California highways. The majority of DPM is small enough to be inhaled into the lungs. Most inhaled particles are subsequently exhaled, but some deposit on the lung surface or are deposited in the deepest regions of the lungs (most susceptible to injury).¹² Chemicals in diesel exhaust, such as benzene and formaldehyde, have been previously identified as TACs by the California Air Resources Board (CARB).

Sensitive Receptors

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

3.3.1.2 *Regulatory Framework*

Federal and State

Clean Air Act

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

¹² California Air Resources Board. "Overview: Diesel Exhaust and Health." Accessed December 6, 2021. <https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health>.

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

Risk Reduction Plan

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

Regional

2017 Clean Air Plan

The Bay Area Air Quality Management District (BAAQMD) is the agency primarily responsible for assuring that the federal and state ambient air quality standards are maintained in the San Francisco Bay Area. Regional air quality management districts, such as BAAQMD, must prepare air quality plans specifying how state and federal air quality standards will be met. BAAQMD's most recently adopted plan is the Bay Area 2017 Clean Air Plan (2017 CAP). The 2017 CAP focuses on two related BAAQMD goals: protecting public health and protecting the climate. To protect public health, the 2017 CAP describes how BAAQMD will continue its progress toward attaining state and federal air quality standards and eliminating health risk disparities from exposure to air pollution among Bay Area communities. To protect the climate, the 2017 CAP includes control measures designed to reduce emissions of methane and other super-greenhouse gases (GHGs) that are potent climate pollutants in the near-term, and to decrease emissions of carbon dioxide by reducing fossil fuel combustion.¹³

CEQA Air Quality Guidelines

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

¹³ BAAQMD. *Final 2017 Clean Air Plan*. April 19, 2017. <http://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans>.

Local

Daly City 2030 General Plan

The Daly City 2030 General Plan (General Plan) includes policies for the purpose of avoiding or mitigating impacts resulting from development projects within the City. The following policies are specific to air quality and are applicable to the proposed project.

Policy/Task	Description
Policy RME-5	Assess projected air emissions from new development and associated construction and demolition activities in conformance with the BAAQMD CEQA Guidelines, and relative to state and federal standards.
Task RME-5.1	Amend the Planning Division's development review procedures to include a formal step that would help identify how a development project can incorporate design or functional changes that will minimize air quality impacts.
Task RME-5.3	Consider cumulative air quality impacts consistent with the region's Clean Air Plan and State law.
Task RME-5.4	Require the preparation of a Transportation Systems Management plan for new development that has been determined to contribute to a reduction in location air quality.
Task RME-5.5	Consult with BAAQMD to identify stationary and mobile TAC sources and determine the need for and requirements of a health risk assessment for proposed developments.
Policy RME-6	Minimize exposure of residents to objectionable smoke and odors by proactively regulating potential sources.
Task RME-6.2	Require new residential development projects and projects categorized as sensitive receptors to be located an adequate distance from facilities that are existing and potential sources of odor. An adequate separate distance will be determined based upon the type, size and operations of the facility.

3.3.1.3 Existing Conditions

The project is located in San Mateo County, which is in the San Francisco Bay Area Air Basin. The project area's proximity to both the Pacific Ocean and the San Francisco Bay has a moderating influence on the climate. The Bay Area is considered a nonattainment area for ground-level O₃ and PM_{2.5} under both the federal Clean Air Act and state Clean Air Act. The area is also considered in nonattainment for PM₁₀ under the state act, but not the federal act. The area has attained both state and federal ambient air quality standards for CO. As part of an effort to attain and maintain ambient air quality standards for O₃ and PM₁₀, BAAQMD has established thresholds of significance for these air pollutants and their precursors. These thresholds are for O₃ precursor pollutants (ROG and NO_x), PM₁₀, and PM_{2.5}, and apply to both construction period and operational period impacts.

The northwest corner of the project site (Parcel A) has been developed with the Jefferson Union High School District (JUHSD) Faculty and Staff Housing project. The northeast corner of the project site (Parcel B) is currently developed with a surface parking lot and portable building units. The southwest corner of the project site is developed with the JUHSD demonstration garden. The remainder of the project site is developed with surface parking lots and a one- to two-story concrete

building that serves as the existing JUHSD district office and adult education buildings. The nearest sensitive receptors to the project site are single- and multi-family residences adjacent the west and south, across Serramonte Boulevard to the north, and the Summit Shasta High School adjacent to the south.

3.3.2 Impact Discussion

For the purpose of determining the significance of the project's impact on air quality, would the project:

- 1) Conflict with or obstruct implementation of the applicable air quality plan?
- 2) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?
- 3) Expose sensitive receptors to substantial pollutant concentrations?
- 4) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

3.3.2.1 *Thresholds of Significance*

Impacts from the Project

As discussed in CEQA Guidelines Section 15064(b), the determination of whether a project may have a significant effect on the environment calls for judgment on the part of the lead agency and must be based, to the extent possible, on scientific and factual data. The City of Daly City has considered the air quality thresholds updated by BAAQMD in May 2017 and regards these thresholds to be based on the best information available for the San Francisco Bay Area Air Basin and conservative in terms of the assessment of health effects associated with TACs and PM_{2.5}. The BAAQMD CEQA Air Quality thresholds used in this analysis are identified in Table 3.3-2 below.

Table 3.3-2: BAAQMD Air Quality Significance Thresholds			
Pollutant	Construction Thresholds	Operation Thresholds	
	Average Daily Emissions (pounds/day)	Average Daily Emissions (pounds/day)	Annual Average Emissions (tons/year)
Criteria Air Pollutants			
ROG, NO _x	54	54	10
PM ₁₀	82 (exhaust)	82	15
PM _{2.5}	54 (exhaust)	54	10
CO	Not Applicable	9.0 ppm (eight-hour) or 20.0 ppm (one-hour)	
Fugitive Dust	Dust Control Measures/Best Management Practices	Not Applicable	
Health Risks and Hazards for New Sources (within a 1,000-foot Zone of Influence)			
Health Hazard	Single Source	Combined Cumulative Sources	
Excess Cancer Risk	10 per one million	100 per one million	
Hazard Index	1.0	10.0	
Incremental Annual PM _{2.5}	0.3 µg/m ³	0.8 µg/m ³ (average)	

3.3.2.2 Project Impacts

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

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

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

The California Emissions Estimator Model (CalEEMod) Version 2020.4.0 was used to estimate emissions from construction and operation of the project. The project land use types and size, and anticipated construction schedule were input to CalEEMod. The model output from CalEEMod along with construction and operational inputs can be found in Appendix C.

BAAQMD is the regional agency responsible for overseeing compliance with State and Federal laws, regulations, and programs within the San Francisco Bay Area Air Basin. As previously stated, BAAQMD's most recently adopted plan is the 2017 CAP. The primary goals of the 2017 CAP are to attain air quality standards, reduce population exposure and protect public health, and reduce GHG emissions and protect the climate. The BAAQMD has also developed CEQA guidelines to assist lead agencies in evaluating the significance of air quality impacts. In formulating compliance strategies, BAAQMD relies on planned land uses established by local general plans. Land use planning affects vehicle travel, which in turn affects region-wide emissions of air pollutants and GHGs.

The 2017 CAP includes control measures that are intended to reduce air pollutant emissions in the Bay Area either directly or indirectly. Plans must show consistency with the control measures listed within the 2017 CAP. As shown in Table 3.3-3 below, the proposed project would generally be consistent with the 2017 CAP measures to reduce automobile trips, as well as energy and water use.

Table 3.3-3: Project Consistency with Applicable 2017 BAAQMD CAP Control Measures	
Control Measure	Project Consistency with Measure Intent
Transportation Measures	
TR2 - Trip Reduction Programs: Implement the regional Commuter Benefits Program (Rule 14-1) that requires employers with 50 or more Bay Area employees to provide commuter benefits. Encourage trip reduction policies and programs in local plans, e.g., general and specific plans while providing grants to support trip reduction efforts. Encourage local governments to require mitigation of vehicle travel as part of new development approval, to adopt transit benefits ordinances in order to reduce transit costs to employees, and to develop innovative ways to encourage rideshare, transit, cycling, and walking for work trips. Fund various employer-based trip reduction programs.	Consistent: The project is required to implement a Transportation Demand Management (TDM) program (see mitigation measure MM TRN-2.1) to reduce vehicle miles traveled by at approximately three percent. The program measures could include, but are not limited to, carpool incentives, carshare memberships, additional last-mile services, and vanpools. The project sites are also in proximity to regional transit.
TR8 - Ridesharing, Last-Mile Connection: Promote carpooling and vanpooling by providing funding to continue regional and local ridesharing programs, and support the expansion of carsharing programs. Provide incentive funding for pilot projects to evaluate the feasibility and cost-effectiveness of innovative ridesharing and other last-mile solution trip reduction strategies. Encourage employers to promote ridesharing and carsharing to their employees.	
TR9 - Bicycle and Pedestrian Access and Facilities: Encourage planning for bicycle and pedestrian facilities in local plans, e.g., general and specific plans, fund bike lanes, routes, paths and bicycle parking facilities.	Consistent: As discussed in Section 3.17 Transportation, the existing bicycle and pedestrian facilities provide adequate access to the project site. The project would construct additional bicycle/pedestrian facilities

Table 3.3-3: Project Consistency with Applicable 2017 BAAQMD CAP Control Measures	
Control Measure	Project Consistency with Measure Intent
	as part of the project and include bicycle parking facilities on-site.
TR13 - Parking Policies: Encourage parking policies and programs in local plans, e.g., reduce minimum parking requirements; limit the supply of off-street parking in transit-oriented areas; unbundle the price of parking spaces; support implementation of demand-based pricing in high-traffic areas.	Consistent: The project proposes a lower parking supply than required by the City's Municipal Code (see Section 3.17.3). In addition, as required by mitigation measure MM TRN-2.1, the project shall implement TDM measures to promote alternatives to single-occupancy vehicle trips.
Building Measures	
BL1 - Green Buildings: Collaborate with partners such as KyotoUSA to identify energy-related improvements and opportunities for onsite renewable energy systems in school districts; investigate funding strategies to implement upgrades. Identify barriers to effective local implementation of the California Green Building Standards Code (CALGreen; Title 24) statewide building energy code; develop solutions to improve implementation/enforcement. Work with ABAG's BayREN program to make additional funding available for energy-related projects in the buildings sector. Engage with additional partners to target reducing emissions from specific types of buildings.	Consistent: The project would be constructed consistent with CALGreen and Title 24 requirements.
BL2 - Decarbonize Buildings: Explore potential Air District rulemaking options regarding the sale of fossil fuel-based space and water heating systems for both residential and commercial use. Explore incentives for property owners to replace their furnace, water heater or natural-gas powered appliances with zero-carbon alternatives. Update Air District guidance documents to recommend that commercial and multi-family developments install ground source heat pumps and solar hot water heaters.	Consistent: Electricity is provided to the site by Peninsula Clean Energy (PCE). PCE customers are automatically enrolled in the ECOplus plan, which generates its electricity from 100 percent carbon-free sources, with at least 50 percent from renewable sources. Customers have the option to enroll in the ECO100 plan, which generates its electricity from 100 percent carbon-free, renewable sources

Table 3.3-3: Project Consistency with Applicable 2017 BAAQMD CAP Control Measures	
Control Measure	Project Consistency with Measure Intent
Waste Management Measures	
WA4 - Recycling and Waste Reduction: Develop or identify and promote model ordinances on community-wide zero waste goals and recycling of construction and demolition materials in commercial and public construction projects.	Consistent: The project shall recycle and/or salvage for reuse a minimum of 60 percent of nonhazardous construction and demolition waste, consistent with Chapter 15.64, Recycling and Diversion of Construction and Demolition Debris of the City's Municipal Code.
Water Measures	
WR2 - Support Water Conservation: Develop a list of best practices that reduce water consumption and increase on-site water recycling in new and existing buildings; incorporate into local planning guidance.	Consistent: The project would be constructed consistent with CALGreen and Title 24 requirements, which require incorporation of water conservation measures.

As described above in Table 3.3-3, the project would be consistent with the applicable 2017 CAP control measures by reducing project generated trips, including bicycle parking facilities on-site, complying with CALGreen and Title 24, using 100 percent carbon free electricity, and recycling. The project, therefore, would not conflict with or obstruct the implementation of the 2017 CAP.

At the project-level, there are no consistency measures or thresholds. The proposed project would not conflict with the latest Clean Air planning efforts because the project would have operational emissions below the BAAQMD thresholds and would be an urban infill development.

Construction Period Emissions

CalEEMod provided annual emissions for construction including both on-site and off-site construction activities for full buildout of the proposed Precise Plan. Construction emissions were based on land use, construction start dates, and soil hauling information provided by the applicant to then generate CalEEMod default equipment and schedule information for a project of this type and size per phase. On-site activities are primarily made up of construction equipment emissions, while off-site activity includes worker, hauling, and vendor traffic. As noted previously in the Project Description, full build out of the entire Precise Plan would take approximately eight-12 years, but could take up to 15 years. However, for purposes of the air quality analysis, the project construction schedule and equipment usage assume the project would be constructed over a period of six years (1,110 workdays). In disclosing construction air quality impacts, it is more conservative to evaluate a shorter construction period, since compressing the total construction activity into a shorter period of time results in higher daily emissions than if the project were built over a longer period of time, so assuming six years rather than eight to 12 years would overstate the construction emissions. The project's average daily emissions were computed by dividing the total construction emissions by the number of construction days.

Table 3.3-4 shows average daily construction emissions of ROG, NO_x, PM₁₀ exhaust, and PM_{2.5} exhaust during construction of the project.

Table 3.3-4: Average Daily Construction Period Emissions - Unmitigated				
Year	ROG (lbs./day)	NO_x (lbs./day)	PM₁₀ (lbs./day)	PM_{2.5} (lbs./day)
2023 (130 workdays)	2.03	18.60	0.92	0.75
2024 (209 workdays)	18.62	15.99	0.79	0.64
2025-2026 (304 workdays)	2.03	16.63	0.80	0.63
2027 (126 workdays)	48.07	12.66	0.65	0.49
2028 (219 workdays)	2.17	16.46	0.87	0.63
2029 (122 workdays)	81.00	13.27	0.74	0.52
BAAQMD Thresholds (lbs./day)	54	54	82	54
Exceed Threshold?	Yes (2029)	No	No	No

As shown in Table 3.3-4 above, the project would generate significant levels of average daily ROG (ROG is primarily emitted from architectural coatings) in 2029 during construction. Additionally, construction activities, particularly during site preparation and grading, would temporarily generate fugitive dust in the form of PM₁₀ and PM_{2.5}. Sources of fugitive dust would include disturbed soils at the construction site and trucks carrying uncovered loads of soils. Unless properly controlled, vehicles leaving the site would deposit mud on local streets, which could be an additional source of airborne dust after it dries. The BAAQMD CEQA Air Quality Guidelines consider these impacts to be less than significant if best management practices (BMPs) are implemented to reduce these emissions.

Mitigation Measures: The project will be required to implement the following mitigation measures to reduce reactive organic gas (ROG) and fugitive dust generation to a less than significant level:

MM AIR-2.1: BAAQMD Best Management Practices: The project shall implement the Bay Area Air Quality Management District's (BAAQMD's) recommended best management practices (BMPs) and additional measures to reduce construction equipment exhaust emissions. These measures shall include the following:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered three times a day and at a frequency adequate to maintain minimum soil moisture of 12 percent. Moisture content shall be verified by lab samples or moisture probe.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.

- All visible mud or dirt track-out onto adjacent public roads shall be removed using a wet power vacuum street sweeper at least once per day. The use of dry power sweeping shall be prohibited.
- All vehicle speeds on unpaved roads shall be limited to 15 mph.
- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.
- All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph and visible dust extends beyond site boundaries.
- Wind breaks (e.g., trees, fences) shall be installed on the windward side(s) of actively disturbed areas of construction adjacent to sensitive receptors. Wind breaks should have at maximum 50 percent air porosity.
- Vegetative ground cover (e.g., fast-germinating native grass seed) shall be planted in disturbed areas as soon as possible and watered appropriately until vegetation is established.
- The simultaneous occurrence of excavation, grading, and ground-disturbing construction activities on the same area at any one time shall be limited. Activities shall be phased to reduce the amount of disturbed surfaces at any one time.
- Avoid tracking of visible soil material on to public roadways by employing the following measures if necessary: (1) Site accesses to a distance of 100 feet from public paved roads shall be treated with a 6 to 12-inch compacted layer of wood chips, mulch, or gravel and (2) washing truck tires and construction equipment of prior to leaving the site.
- Sandbags or other erosion control measures shall be installed to prevent silt runoff to public roadways from sites with a slope greater than one percent.

MM AIR-2.2: Selection of Construction Equipment: All construction equipment larger than 25 horsepower used at the site for more than two continuous days or 20 hours total shall meet U.S. Environmental Protection Agency (EPA) Tier 4 emission standards PM (PM₁₀ and PM_{2.5}), if feasible, otherwise,

- Use equipment that meets U.S. EPA emission standards for Tier 2 or 3 engines and include particulate matter emissions control equivalent to

California Air Resources Board (CARB) Level 3 verifiable diesel emission control devices that altogether achieve a 50-percent reduction in particulate matter exhaust in comparison to uncontrolled equipment; alternatively (or in combination).

- Use of electrical or non-diesel fueled equipment.

Alternatively, the applicant may develop another construction operations plan demonstrating that the construction equipment used on-site would achieve a reduction in construction diesel particulate matter emissions by 70 percent or greater. Elements of the plan could include a combination of some of the following measures:

- Implementation of Tier 4 or alternatively fueled equipment,
- Installation of electric power lines during early construction phases to avoid use of diesel generators and compressors,
- Use of electrically-powered equipment,
- Forklifts and aerial lifts used for exterior and interior building construction shall be electric or propane/natural gas powered,
- Change in construction build-out plans to lengthen phases, and
- Implementation of different building techniques that result in less diesel equipment usage.

Such a construction operations plan would be subject to review by an air quality expert and approved by the City prior to construction.

MM AIR-2.3: Low Volatile Organic Compound (VOC) Coating: The project shall use low volatile organic compound or VOC (i.e., ROG) coatings, that are below current BAAQMD requirements (i.e., Regulation 8, Rule 3: Architectural Coatings), for at least 50 percent of all residential and nonresidential interior paints and 50 percent of exterior paints. This includes all architectural coatings applied during both construction and reapplications throughout the project's operational lifetime. At least 50 percent of coatings applied must meet a "super-compliant" VOC standard of less than 10 grams of VOC per liter of paint. For reapplication of coatings during the project's operational lifetime, the Declaration of Covenants, Conditions, and Restrictions shall contain a stipulation for low VOC coatings to be used.

MM AIR-2.1 through MM AIR-2.3 would reduce ROG emissions by 50 percent, to 40.74 lbs./day, resulting in ROG emissions below the BAAQMD threshold. Therefore, with implementation of MM-AIR-2.1 through MM-AIR-2.3, project construction would not exceed BAAQMD's thresholds of significance.

Operational Period Emissions

Operational period emissions from full buildout of the proposed Precise Plan would be generated primarily from vehicles driven by future residents, employees, customers, and vendors.¹⁴ Evaporative emissions from architectural coatings and maintenance products (classified as consumer products) are also typical emissions from these types of uses. The proposed project also would include four 750-kilowatt (kW) diesel-fueled emergency generators. The emergency generators would be tested periodically and would power the proposed buildings in the event of a power failure. For modeling purposes, it was assumed that the generators would be operated primarily for testing and maintenance purposes. CARB and BAAQMD requirements limit these engine operations to 50 hours each per year of non-emergency operation. During testing periods, the engine would typically be run for less than one hour. CalEEMod was used to estimate emissions from operation of the proposed project. As discussed in Section 3.17 Transportation, the proposed project would implement a Transportation Demand Management (TDM) plan to achieve a three percent reduction in vehicle miles traveled (VMT); therefore, mobile emissions were reduced by three percent to reflect the effectiveness of the TDM plan. A summary of the calculated annual operational emissions is provided in Table 3.3-5, below. It was assumed that the earliest year of full project buildout and operation would occur in 2030 (in the event full buildout occurs later in time beyond 2030, emissions would be even lower as fuel efficiency gains would further reduce emissions), and as individual parcels are built and occupied, emissions would remain below the table values presented below.

Table 3.3-5: Unmitigated Operational Period Emissions				
Scenario	ROG	NO_x	PM₁₀	PM_{2.5}
2022 Existing Emissions	1.02	0.49	0.65	0.17
2030 Project Operational Emissions (tons/year)	10.83	2.94	6.81	1.78
2030 Net Project Operational Emissions (tons/year)	9.81	2.44	6.16	1.60
BAAQMD Thresholds (tons/year)	10	10	15	10
Exceed Threshold?	No	No	No	No
2030 Net Project Operational Emissions (lbs./day) ¹	53.77	13.38	33.76	8.79
BAAQMD Thresholds (lbs./day)¹	54	54	82	54
Exceed Threshold?	No	No	No	No
¹ Assumes 365-day operation				

As shown in Table 3.3-5, above, the project would not exceed annual or daily BAAQMD significance thresholds during project operation. **(Less than Significant Impact with Mitigation Incorporated)**

¹⁴ Vehicle trips from the already built Parcel A project were included in the operational analysis to accurately reflect full buildout of the proposed Precise Plan.

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

This project would introduce new sources of TACs during construction (i.e., on-site construction activity and truck hauling emissions) and operation (i.e., emergency diesel generators). Sensitive receptors within the project vicinity include residences to the south, west, and north of the project site and the Summit Shasta High School adjacent to the southern boundary of the project site.

Construction Toxic Air Contaminants

Project construction activity would generate dust and equipment exhaust that would affect nearby sensitive receptors. Community risk impacts were addressed by predicting increased cancer risk, the increase in annual PM_{2.5} concentrations and computing the Hazard Index (HI) for non-cancer health risks. The maximally exposed individual (MEI) for construction cancer risk was determined to be located on the first floor at a multi-family residence across Serramonte Boulevard north of the project site (see Figure 3.3-1). The maximum annual PM_{2.5} concentration from construction was shown to occur on the first floor at the Summit Shasta High School, adjacent to the southern boundary of the project (as seen in Figure 3.3-1) and was estimated to be 0.29 µg/m³. Table 3.3-6 summarizes the community health risk impacts associated with project construction.

Table 3.3-6: Construction Risk Impacts at Off-Site MEI				
Source		Cancer Risk (per million)¹	PM_{2.5} Concentration (µg/m³)²	Hazard Index ²
Most Affected Residential Receptor				
Project Construction	Unmitigated	19.28 (infant)	0.15	0.01
	Mitigated ³	3.33 (infant)	0.05	<0.01
BAAQMD Single-Source Threshold		10	0.3	1.0
Exceed Threshold?	Unmitigated	Yes	No	No
	Mitigated	No	No	No
Most Affected Student Receptor – Summit Shasta High School				
Project Construction	Unmitigated	11.96 (child)	0.29	0.02
	Mitigated	2.13 (child)	0.11	<0.01
BAAQMD Single-Source Threshold		10	0.3	1.0
Exceed Threshold?	Unmitigated	Yes	No	No
	Mitigated ³	No	No	No
1. Maximum assuming third-trimester fetus, infant, child exposure for construction and child/adult exposure during operation for 30-year exposure. 2. Maximum annual concentration for any year. 3. Assumes implementation of mitigation measures MM AIR-2.1 and MM AIR-2.2.				



LOCATION OF OFF-SITE RECEPTORS, MEIS, AND PROPOSED EMERGENCY GENERATORS

FIGURE 3.3-1

As shown in Table 3.3-6, unmitigated project construction would exceed the BAAQMD single-source threshold for cancer risk at the residential and student MEI. However, implementation of MM AIR-2.1 and MM AIR-2.2 would reduce the project's cancer risk impacts to less than significant levels. Both the unmitigated and mitigated maximum annual PM_{2.5} concentration and HI value from project construction would not exceed their respective BAAQMD single-source thresholds.

The community health risk impacts summarized in Table 3.3-6 are based on the proposed construction phasing of developing Parcel B first, followed by Parcels C and D, and finally Parcels E and F (see Section 2.2.1 Precise Plan). Any deviations from this phasing could result in different community health risk impacts than analyzed in this EIR. If construction phasing were to change during buildout of the proposed Precise Plan, the project would be required to implement the following mitigation measure.

Mitigation Measures: The project will be required to implement the following mitigation measure if construction phasing changes in order to confirm community health risk impacts are reduced to a less than significant level:

MM AIR-3.1: Prior to the issuance of a grading permit, the applicant shall provide the City with the most recent construction phasing schedule by parcel for buildout of the proposed Precise Plan. If the most recent construction phasing schedule increases the number of units per construction phase compared to the construction phasing assumed in the air quality analysis of this EIR, the applicant shall prepare an updated community health risk assessment to confirm that the new phasing will not result in any new or more significant air quality impacts not previously disclosed in this EIR. The updated community health risk assessment shall be reviewed and approved by the Director of Community Development or Director's designee.

Operational Toxic Air Contaminants

As previously stated, operation of the full buildout of the Precise Plan would have long-term emissions from the proposed emergency generators and project generated traffic. Figure 3.3-1 shows the proposed locations of the generators throughout the project site. The MEI for project operation was determined to be the same as the construction MEI for cancer risk and PM_{2.5}. CalEEMod was used to calculate the health risk impacts from the emergency generators and CalTrans version of the EMFAC2017 emissions model was used to calculate health risk impacts from project generated traffic. The results are summarized in Table 3.3-7 below.

Table 3.3-7: Operational Risk Impacts at Off-Site MEI			
Source	Cancer Risk (per million)¹	PM_{2.5} Concentration (µg/m³)²	Hazard Index ²
Most Affected Residential Receptor			
Project Traffic	0.48 (child)	0.10	<0.01
Emergency Generators	1.37 (child)	<0.01	<0.01

Table 3.3-7: Operational Risk Impacts at Off-Site MEI			
Source	Cancer Risk (per million)¹	PM_{2.5} Concentration (µg/m³)²	Hazard Index ²
Unmitigated Project Total	1.85 (child)	0.1	0.01
BAAQMD Single-Source Threshold	10	0.3	1.0
Exceed Threshold?	No	No	No
Most Affected Student Receptor – Summit Shasta High School			
Project Traffic	0.26 (child)	0.11	<0.01
Emergency Generators	0.09 (child)	<0.01	<0.01
Unmitigated Project Total	0.35 (child)	0.11	0.02
BAAQMD Single-Source Threshold	10	0.3	1.0
Exceed Threshold?	No	No	No
1. Maximum assuming third-trimester fetus, infant, child exposure for construction and child/adult exposure during operation for 30-year exposure. 2. Maximum annual concentration for any year.			

As shown in Table 3.3-7, the proposed emergency generators and project generated traffic would not exceed BAAQMD single-source thresholds at the location of the MEI. Additionally, diesel engines are subject to CARB's Stationary Diesel Airborne Toxics Control Measure and the proposed generator would require permits from the BAAQMD since it would be larger than 50 horsepower. As part of the BAAQMD permit requirements for toxics screening analysis, the engine emissions will have to meet Best Available Control Technology for Toxics and pass the toxic risk screening level of less than ten in a million. The risk assessment would be prepared by the BAAQMD. Depending on results, the BAAQMD would set limits for DPM emissions (e.g., more restrictive engine operation periods). Sources of air pollutant emissions complying with all applicable BAAQMD regulations generally will not be considered to have a significant air quality community risk impact.

Combined Project Toxic Air Contaminants

As shown in Table 3.3-6 and Table 3.3-7 above, unmitigated project construction would exceed the BAAQMD single-source threshold for cancer risk at the residential and student MEI and unmitigated operational emissions would not exceed BAAQMD single-source thresholds. Table 3.3-8 summarizes the mitigated cancer risks, annual PM_{2.5} concentrations, and HI values associated with construction and operation of the proposed project.

Table 3.3-8: Combined Mitigated Risk Impacts at Off-Site MEI			
Source	Cancer Risk (per million)¹	PM_{2.5} Concentration (µg/m³)²	Hazard Index ²
Most Affected Residential Receptor			
Construction (Years 0 – 6) ³	3.33 (infant)	0.05	<0.01

Table 3.3-8: Combined Mitigated Risk Impacts at Off-Site MEI			
Source	Cancer Risk (per million)¹	PM_{2.5} Concentration (µg/m³)²	Hazard Index ²
Traffic (Years 3 – 30)	0.48 (child)	0.10	<0.01
Emergency Generators (Years 3 – 30)	1.37 (child)	<0.01	<0.01
Mitigated Project Total	5.18 (infant)	0.10	0.01
BAAQMD Single-Source Threshold	10	0.3	1.0
Exceed Threshold?	No	No	No
Most Affected Student Receptor – Summit Shasta High School			
Construction (Years 0 – 6) ³	2.13 (child)	0.11	<0.01
Traffic (Years 3 – 9)	0.26 (child)	0.11	<0.01
Emergency Generators (Years 3 – 9)	0.09 (child)	<0.01	<0.01
Mitigated Project Total	2.48 (child)	0.11	<0.01
BAAQMD Single-Source Threshold	10	0.3	1.0
Exceed Threshold?	No	No	No
1. Maximum assuming third-trimester fetus, infant, child exposure for construction and child/adult exposure during operation for 30-year exposure. 2. Maximum annual concentration for any year. 3. Assumes implementation of mitigation measures MM AIR-2.1 and MM AIR-2.2.			

As shown in Table 3.3-8, with implementation of MM AIR-2.1 and MM AIR-2.2, cancer risks would be reduced to less than significant levels. Both the unmitigated and mitigated annual PM_{2.5} concentration and HI value from construction and operation activities would not exceed the single-source significance thresholds.

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

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

The project would generate localized emissions of diesel exhaust during construction equipment operation and truck activity. These emissions may be noticeable from time to time by adjacent receptors. However, they would be localized and not likely to adversely affect people off-site by resulting in confirmed odor complaints. Occupancy of the residential buildings and the ground floor retail spaces would not generate odors that would result in complaints. There were no identified odor sources that would affect the project in terms of generating frequent odor complaints. **(Less Than Significant Impact)**

3.3.2.3 *Cumulative Impacts*

Impact AIR-C: The project would not result in a cumulatively considerable contribution to a cumulatively significant air quality impact. **(Less than Significant Cumulative Impact with Mitigation Incorporated)**

Cumulative Exposure of Sensitive Receptors

Community health risk assessments typically look at all substantial sources of TACs that can affect sensitive receptors that are located within 1,000 feet of the project site (i.e., influence area). These sources include railroads, freeways or highways, busy surface streets, and stationary sources identified by BAAQMD. A review of the project area indicated that State Route (SR) 1, SR 35 (Skyline Boulevard), Callan Boulevard, Hickey Boulevard, and Serramonte Boulevard have an average daily traffic (ADT) over 10,000 vehicles per day. Other nearby streets all have ADT less than 10,000 vehicles and are not considered sources of TACs. Additionally, a review of the BAAQMD's Permitted Stationary Sources 2018 GIS website map indicates there is one stationary source within the project site's 1,000-foot influence area. Table 3.3-9 shows the project and cumulative community risk impacts at the off-site MEI. The off-site MEI is the same as those identified under Impact AIR-3 above.

Table 3.3-9: Cumulative Community Risk Impacts at Off-Site MEI				
Source		Cancer Risk (per million)¹	PM_{2.5} Concentration (µg/m³)²	Hazard Index ²
Project ³	Unmitigated	21.13	0.29	0.02
	Mitigated	5.18	0.11	<0.01
State Route 1 & 35		5.71	0.09	--
Callan Boulevard, ADT 13,950		0.29	0.02	<0.01
Hickey Boulevard, ADT 17,950		0.02	0.01	<0.01
Serramonte Boulevard, ADT 11,565		2.01	0.01	<0.01

Table 3.3-9: Cumulative Community Risk Impacts at Off-Site MEI				
Source		Cancer Risk (per million)¹	PM_{2.5} Concentration (µg/m³)²	Hazard Index ²
KNK Petroleum Inc dba Triton Gas (Facility ID #111517, Gas Station), MEI at 325 feet		2.61	--	0.01
Cumulative Total	Unmitigated	31.77	0.42	<0.06
	Mitigated	15.82	0.24	<0.05
BAAQMD Cumulative-Source Threshold		100	0.8	10.0
Exceed Threshold?	Unmitigated	No	No	No
	Mitigated	No	No	No
1. Maximum assuming third-trimester fetus, infant, child exposure for construction and child/adult exposure during operation for 30-year exposure for residential receptors and 9-year exposure for student receptors. 2. Maximum annual concentration for any year. 3. Cancer risk MEI occurred at residential receptor to the north and PM _{2.5} Concentration MEI occurred at high school receptor to the south.				

As shown in Table 3.3-9, the combined effect of all TAC sources in the project area (with implementation of MM AIR-2.1 and MM AIR-2.2) would be less than significant because the cumulative threshold of significance would not be exceeded. Thus, the project would not make a considerable contribution to a cumulative impact. **(Less than Significant Cumulative Impact with Mitigation Incorporated)**

3.3.3 Non-CEQA Effects

Per *California Building Industry Association v. Bay Area Air Quality Management District*, 62 Cal. 4th 369 (*BIA v. BAAQMD*), effects of the environment on the project are not considered CEQA impacts. The following discussion is included for informational purposes only because the City of Daly City has policies (Policy RME-5) that address existing air quality conditions affecting a proposed project.

On-site Community Health Risk – New Project Residents

A health risk assessment was completed to analyze the impact of existing and new TAC sources (i.e., emergency diesel generator, project generated traffic) would have on the new proposed sensitive receptors (i.e., residents and daycare) that buildout of the proposed Precise Plan would introduce to the site. New sensitive receptors would be located in the proposed apartment buildings and daycare space. The on-site MEI was determined to be located on the west side of Parcel D. The same TAC sources discussed under Impact AIR-3 were used in this health risk assessment. A summary of this assessment is shown in Table 3.3-10.

Table 3.3-10: Cumulative Community Risk Impacts at On-Site MEI				
Source		Cancer Risk (per million)	PM_{2.5} Concentration (µg/m³)	Hazard Index
Project	Unmitigated	27.31	0.35	0.02
	Mitigated	5.21	0.14	0.01
State Route 1 & 35		5.79	0.20	--
Callan Boulevard, ADT 13,950		0.23	0.03	<0.01
Hickey Boulevard, ADT 17,950		0.07	0.01	<0.01
Serramonte Boulevard, ADT 11,565		1.08	0.10	<0.01
KNK Petroleum Inc dba Triton Gas (Facility ID #111517, Gas Station), Project Site at 300 feet		3.09	--	0.01
BAAQMD Single-Source Threshold		10	0.3	1.0
Exceed Threshold?	Unmitigated	Yes	Yes	No
	Mitigated	No	No	No
Cumulative Total	Unmitigated	35.57	0.69	<0.06
	Mitigated	15.47	0.48	<0.05
BAAQMD Cumulative-Source Threshold		100	0.8	10.0
Exceed Threshold?	Unmitigated	No	No	No
	Mitigated	No	No	No

As shown in Table 3.3-10, the project construction sources' unmitigated cancer risk and PM_{2.5} concentrations exceed the BAAQMD single-source thresholds, but the project and cumulative sources combined would not exceed the cumulative-source thresholds. With implementation of MM AIR-2.1 and MM AIR-2.2, cancer risk and PM_{2.5} concentrations affecting future project residents due to project construction would be reduced to below the BAAQMD single-source thresholds, and no additional mitigation is needed to reduce cumulative health risks.

3.4 BIOLOGICAL RESOURCES

The following discussion is based, in part, on a Biological Resource Assessment (dated October 2021) prepared by Environmental Collective, a Wetland Assessment (dated February 13, 2023) prepared by Hanson Bridgett, LLP, and a Biological Peer Review (dated May 2023) prepared by WRA Environmental Consultants. Copies of these reports are attached to this EIR as Appendix D, Appendix E, and Appendix F, respectively.

3.4.1 Environmental Setting

3.4.1.1 *Background Information*

Sensitive Natural Communities

Sensitive natural communities are natural community types considered to be rare or of a “high inventory priority” by the California Department of Fish and Wildlife (CDFW). Although sensitive natural communities have no legal protective status under the Federal Endangered Species Act (FESA) or California Environmental Species Act (CESA) (refer to Section 3.4.1.2 Regulatory Framework), they are provided some level of consideration under CEQA. Appendix G of the CEQA Guidelines identifies potential impacts on a sensitive natural community as one of six criteria to consider in determining the significance of a proposed project. While no thresholds are established as part of this criterion, it serves as an acknowledgement that sensitive natural communities are an important resource and, depending on their rarity, should be recognized as part of the environmental review process. The level of significance of a project’s impact on any particular sensitive natural community will depend on that natural community’s relative abundance and rarity.

Species of Special Concern

The CDFW maintains an administrative list of Species of Special Concern (SSC), defined as a “species, subspecies, or distinct population of an animal native to California that currently satisfies one or more of the following (not necessarily mutually exclusive) criteria:

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

The CDFW’s Nongame Wildlife Program is responsible for producing and updating SSC publications for mammals, birds, and reptiles and amphibians. Section 15380 of the CEQA Guidelines clearly indicates that SSC should be included in an analysis of project impacts if they can be shown to meet the criteria of sensitivity outline therein. In contrast to species listed under the federal ESA or CESA, however, SSC have no formal legal status.

The California Native Plant Society (CNPS) is a non-profit conservation organization dedicated to the preservation of native flora in California. The CNPS has been involved in assembling, evaluating, and distributing information on special-status plant species in the state, as listed in the Inventory of Rare and Endangered Plants of California. CNPS has recently updated their rating system for the rarity of special-status plants, and now include both a California Rare Plant Rank and a Threat Rank. CEQA requires government agencies to consider environmental impacts of discretionary projects and to avoid or mitigate them where possible. Under Section 15380, CEQA provides protection for both State-listed species and for any other species which can be shown to meet the criteria for State listing. The CDFW recognizes that special-status plants with a California Rare Plant Rank of 1A (Presumed extinct in California), 1B (Rare, threatened, or endangered in California and elsewhere), and 2 (Rare and endangered in California, but are more common elsewhere) in the CNPS Inventory consist of plants that, in a majority of cases, would qualify for listing and these species should be addressed under CEQA review. In addition, the CDFW recommends, and local governments may require, protection of species which are regionally significant, such as locally rare species, disjunct populations, essential nesting and roosting habitat for more common wildlife species, or plants with a CNPS California Rare Plant Rank of 3 (Plant species for which additional data is needed – a review list) and 4 (Plant species of limited distribution – a watch list).

3.4.1.2 *Regulatory Framework*

Federal and State

Endangered Species Act

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

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

Clean Water Act

The United States Army Corps of Engineers (USACE) is responsible under Section 404 of the Clean Water Act to regulate the discharge of fill material into waters of the U.S. These waters, and their lateral limit, are defined in 33 CFR Part 328.3(a) and include streams that are tributaries to navigable waters and their adjacent wetlands. The lateral limits of jurisdiction for a non-tidal stream are measured at the line of the Ordinary High Water Mark (33 CFR Part 328.3[e]) or the limit of adjacent wetlands (33 CFR Part 328.3[b]). Any permanent extension of the limits of an existing water of the

U.S., whether natural or man-made, results in a similar extension of Corps jurisdiction (33 CFR Part 328.5).

Waters of the U.S. fall into two broad categories: wetlands and other waters. Other waters include waterbodies and watercourses generally lacking plant cover such as rivers, streams, lakes, springs, ponds, coastal waters, and estuaries. Wetlands are aquatic habitats that support hydrophytic wetland plants and include marshes, wet meadows, seeps, floodplains, basins, and other areas experiencing extended seasonal soil saturation. Seasonally or intermittently inundated features, such as seasonal ponds, ephemeral streams, and tidal marshes, are categorized as wetlands if they have hydric soils and support wetland plant communities. Seasonally inundated waterbodies or watercourses that do not exhibit wetland characteristics are classified as other waters of the U.S.

Waters and wetlands that cannot trace a continuous hydrologic connection to a navigable water of the U.S. are not tributary to waters of the U.S. These are termed “isolated wetlands.” Isolated wetlands are jurisdictional when their destruction or degradation can affect interstate or foreign commerce (33 CFR Part 328.3[a]). The Corps may or may not take jurisdiction over isolated wetlands depending on the specific circumstances.

In general, a project proponent must obtain a Section 404 permit from the Corps before placing fill or grading in wetlands or other waters of the U.S. Prior to issuing the permit, the Corps is required to consult with the USFWS under Section 7 of the ESA if the project may affect federally listed species.

All Corps permits require water quality certification under Section 401 of the Clean Water Act. In the San Francisco Bay Area, this regulatory program is administered by the San Francisco Bay Regional Water Quality Control Board (RWQCB). Project proponents who propose to fill wetlands or other waters of the U.S. must apply for water quality certification from the RWQCB. The RWQCB has adopted a policy requiring mitigation for any loss of wetland, streambed, or other jurisdictional area.

Porter-Cologne Water Quality Control Act

Under this Act (California Water Code Sections 13000–14920), the RWQCB is authorized to regulate the discharge of waste that could affect the quality of the State’s waters. The RWQCB asserts jurisdiction over isolated waters and wetlands, as well as waters and wetlands that are regulated by the Corps. Therefore, even if a project does not require a federal permit, it may still require review and approval by the RWQCB. When reviewing applications, the RWQCB focuses on ensuring that projects do not adversely affect the “beneficial uses” associated with waters of the State. In most cases, the RWQCB seeks to protect these beneficial uses by requiring the integration of waste discharge requirements (WDRs) into projects that will require discharge into waters of the State. For most construction projects, the RWQCB requires the use of construction and post-construction Best Management Practices (BMPs).

Migratory Bird Treaty Act

The federal Migratory Bird Treaty Act (MBTA) prohibits killing, capture, possession, or trade of migratory birds except in accordance with regulations prescribed by the Secretary of the Interior. Hunting and poaching are also prohibited. The taking and killing of birds resulting from an activity is

not prohibited by the MBTA when the underlying purpose of that activity is not to take birds.¹⁵ Nesting birds are considered special-status species and are protected by the USFWS. The CDFW also protects migratory and nesting birds under California Fish and Game Code Sections 3503, 3503.5, and 3800. The CDFW defines taking as causing abandonment and/or loss of reproductive efforts through disturbance.

Fish and Game Code

The CDFW is also responsible for enforcing the California Fish and Game Code, which contains several provisions potentially relevant to construction projects. For example, Section 1602 of the Fish and Game Code governs the issuance of Lake and Streambed Alteration Agreements by the CDFW. Lake or Streambed Alteration Agreements are required whenever project activities substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake designated as such by the CDFW.

The Fish and Game Code also lists animal species designated as Fully Protected or Protected, which may not be taken or possessed at any time. The CDFW does not issue licenses or permits for take of these species except for necessary scientific research, habitat restoration/species recovery actions, or live capture and relocation pursuant to a permit for the protection of livestock. Fully protected species are listed in Sections 3511 (birds), 4700 (mammals), 5050 (reptiles and amphibians), and 5515 (fish) of the Fish and Game Code, while Protected amphibians and reptiles are listed in Chapter 5, Sections 41 and 42.

Several provisions in the California Fish and Game code provide for the protection of birds and bird nests in active use. Unless the Fish and Game Code (FGC) or its implementing regulations provide otherwise, under California law it is unlawful to:

- Take a bird, mammal, fish, reptile, or amphibian (FGC Section 2000);
- Take, possess, or needlessly destroy the nest or eggs of any bird (FGC Section 3503);
- Take, possess, or destroy any bird of prey in the orders Strigiformes (owls) and Falconiformes (such as falcons, hawks and eagles) or the nests or eggs of such bird (FGC Section 3503.5);
- Take or possess any of the thirteen fully protected bird species listed in FGC Section 3511;
- Take any non-game bird (i.e., bird that is naturally occurring in California that is not a gamebird, migratory game bird, or fully protected bird) (FGC Section 3800);
- Take or possess any migratory non-game bird as designated in the MBTA or any part of such bird, except as provided by rules or regulations adopted by the DOI under the MBTA (FGC Section 3513);
- Take, import, export, possess, purchase, or sell any bird (or products of a bird), listed as an endangered or threatened species under the CESA unless the person or entity possesses an Incidental Take Permit or equivalent authorization from CDFW (FGC Section 2050 et seq.).

¹⁵ United States Department of the Interior. “Memorandum M-37050. The Migratory Bird Treaty Act Does Not Prohibit Incidental Take.” Accessed December 6, 2021. <https://www.doi.gov/sites/doi.gov/files/uploads/m-37050.pdf>.

- Non-native species, including European starling, house sparrow, and rock pigeon, are not afforded any protection under the MBTA or California Fish and Game Code.

Regional

San Bruno Mountain Habitat Conservation Plan

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

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

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

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

Local

Daly City 2030 General Plan

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

Policy/Task	Description
Policy LU-17	Ensure that private development is responsible for providing any on- or off-site improvements related to and/or mitigating the impacts it causes.

- Policy LU-18 Development activities shall not be allowed to significantly disrupt the natural or urban environment and all reasonable measures shall be taken to identify and prevent or mitigate potentially significant effects.
- Policy RME-16 The City shall continue to recognize the importance of the San Bruno Mountain HCP, uphold the integrity of the concepts behind the plan, and respect the agreements that serve to implement it.
-

Municipal Code Chapter 12.40 – Urban Forestry Ordinance

The Municipal Code provides regulations to optimize the use of trees and other landscaping within the city. Chapter 12.40 requires plans submitted to the City for the construction, repair, or alteration of any building, housing, or structure to include provisions for sufficient guards or protectors to prevent injury to any existing publicly owned trees, shrubs, flowers, or vines. It also imposes conditions regarding the displacement of public trees, where a comparable size tree shall be planted, or a fee is paid to the City to cover the cost of replacing a removed tree.

3.4.1.3 *Existing Conditions*

The project site is located within an urbanized area of Daly City and is developed with the JUHSD campus, which is situated on an artificial flat that was created when the sloping property was graded and developed in 1969. The area has been extensively disturbed by past development, with most of the graded portion of project site occupied by buildings and pavement. Trees and landscaping are scattered throughout the area. The slopes located on the western, northern, and eastern portions of the area are occupied by non-native Monterey pine (*Pinus radiata*) and Monterey cypress (*Hesperocyparis macrocarpa*) trees, with an understory of non-native grasses and forbs, ivy (*Hedera* spp.), periwinkle (*Vinca major*), ice plant (*Delosperma* sp.), poison oak (*Toxicodendron diversilobum*), sour grass (*Oxalis pes-caprae*), and other species. Grassland species consist of annual grasses and forbs such as wild oats (*Avena* spp.), bromes (*Bromus* spp.), cut-leaf geranium (*Geranium dissectum*), bristly ox-tongue (*Helminthotheca echioides*), and bindweed (*Convolvulus arvensis*), among others.¹⁶

Sensitive Natural Communities

No riparian, native grassland, valley oak woodland, or other sensitive natural communities are present within the project site. As mentioned in Section 2.2.1.1, there is a demonstration garden in the southwest portion of the site. As documented in Appendix D, although native plant species are present in the Demonstration Garden as a result of being planted by gardeners (refer to Figure 3.4-1 and Photo 2), no rare or threatened plant species were found on-site; therefore, the garden does not meet CDFW's definition of a sensitive natural community with special status under federal and state law (refer to Section 3.4.1.1 Environmental Setting and Section 3.4.1.2 Regulatory Framework). The project site is also occupied by two separate stands of native arroyo willow, including one located on the eastern slopes and another located to the south of the Demonstration Garden (refer to Figure 3.4-1).¹⁷

¹⁶ A forb is a herbaceous flowering plant.

¹⁷ Arroyo willow is considered a Facultative Wetland (FACW) species according to the National Wetland Plant List (NWPL) typically growing in riparian conditions indicative of available surface water. The NWPL is used by the



Biological Land Cover

FIGURE 3.4-1

Each stand is several hundred square feet in size and surrounded by non-native plantings and impervious surfaces. These stands are not indicative of riparian conditions since there are no natural drainages entering or leaving the willow stand locations, indicating they are likely formed by poor drainage following development of the property or irrigation runoff. This is particularly true for the willow stand located on the steep eastern slopes where water could not concentrate. Additionally, these willow stands are dominated by non-native upland species of grasses and shrubs, and are located in an area extensively disturbed by past development. Based on these facts, both the Biological Resources Assessment and Biological Peer Review (refer to Appendix D and Appendix F, respectively) concurred that these willow stands do not meet the definition of a sensitive natural community.

Special-Status Species

Special-status species are plants and animals that are legally protected under the Federal Endangered Species Act (FESA), California Endangered Species Act (CESA), or other regulations, and species that are considered sufficiently rare by the scientific community to qualify for such listing. For purposes of this analysis, special-status plant species include the following:

- Listed under FESA as threatened, endangered, proposed threatened, proposed endangered, or a candidate species.
- Listed under CESA as threatened, endangered, rare, or a candidate species.
- Listed by the CNPS as California Rare Plant Rank (CRPR) 1A, 1B, 2, 3, or 4.

For purposes of this analysis, special-status wildlife species include the following:

- Listed under FESA as threatened, endangered, proposed threatened, proposed endangered, or a candidate species.
- Listed under CESA as threatened, endangered, or a candidate threatened or endangered species.
- Designated by the CDFW as a California species of special concern.
- Listed in the California Fish and Game Code as fully protected species (fully protected birds are provided in Section 3511, mammals in Section 4700, reptiles and amphibians in Section 5050, and fish in Section 5515).

Special Status Plants

No special-status plant species were observed on the project site during surveys conducted by Environmental Collective and WRA. None of the special-status plants known to occur in Daly City are mapped within the project site according to the California Natural Diversity Database (CNDDB). Suitable conditions for special-status plants are not present within the project site due to the extensive grading and development that the area has undergone, which precludes their occurrence within the area. While the Demonstration Garden includes some native plants planted by gardeners, none are classified as special-status.

Special-Status Wildlife

No special-status wildlife species were observed during the surveys conducted by Environmental Collective and WRA. Most special-status wildlife species known to occur in northern San Mateo County are associated with coastal salt marsh and riparian habitat, which are not present within the Precise Plan area. Due to a lack of larval host plant species or suitable habitat such as serpentine substrate or perennial aquatic habitat, special-status invertebrate species are unlikely to be present within the project site. The range of the western bumble bee, which is not a protected species under federal or state law but is being closely monitored due to declines in numbers and distribution over the past two decades, does not encompass the project site.

Bird nests of migratory bird species are protected under federal and state law (refer to Section 3.4.1.2 Regulatory Framework). No evidence of bird nests was observed during the aforementioned site visits, but suitable nesting habitat exists in the trees located along the project site perimeter.

There are no recorded occurrences of any special-status bat species within the project site and surrounding vicinity. However, trees and man-made building cavities, both of which are present on-site, are commonly used by bats, including the pallid bat (*Antrozous pallidus*) and Townsend's western big-eared bat (*Corynorhinus townsendii*), for roosting.

Jurisdictional Waters

As noted above under Sensitive Natural Communities, arroyo willow is typically found growing in riparian conditions indicative of available surface water, but may occur in non-wetlands. The arroyo willow stands are not connected to a natural drainage and have likely been supported by poor drainage following site development or irrigation runoff. Further, soils present at the willow stands lack redoximorphic features and do not meet the hydric soil criteria used to delineate wetlands.¹⁸ Accordingly, both the Biological Resources Assessment and Biological Peer Review (refer to Appendix D and Appendix F, respectively) concurred that the willow stands do not meet the definition of a regulated wetland under federal and state law.

There is an approximately 865 square foot meadow located adjacent to the southwestern willow stand (see Photo 5 and Figure 3.4-1) that consists of facultative grasses including Italian ryegrass (*Festuca perennis*), bristly ox-tongue (*Helminthotheca echioides*), velvet grass (*Holcus lanatus*), annual beard grass (*Polypogon monspeliensis*), fringed willowherb (*Epilobium ciliatum*), and common rush (*Juncus patens*).¹⁹ Soils present within this meadow exhibit redoximorphic features, and met hydric soil indicators. The meadow, however, is a result of deferred maintenance on the project site's drainage system and is not a naturally occurring wetland (see Appendix E and Appendix F); therefore, the meadow would not qualify as a jurisdictional wetland under the Clean Water Act or Porter-Cologne Act or as a sensitive natural community type.

¹⁸ Redoximorphic features are color patterns soils that indicate periodic or regular saturation with water. Hydric soil is soil that has formed under conditions of saturation, flooding, or ponding long enough during the growing season to develop anaerobic conditions in the upper part of the soil.

¹⁹ A facultative species is one that occurs in wetlands and non-wetlands.



Photo 5: View of meadow in southwest corner of the project site.

3.4.2 **Impact Discussion**

For the purpose of determining the significance of the project's impact on biological resources, would the project:

- 1) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or United States Fish and Wildlife Service (USFWS)?
- 2) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS?
- 3) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?
- 4) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?
- 5) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?
- 6) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

3.4.2.1 ***Project Impacts***

Impact BIO-1:	The project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. (Less than Significant Impact with Mitigation Incorporated)
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As discussed in Section 3.4.1.3 Existing Conditions, there are no known occurrences of special-status plants or wildlife within the project site. However, trees and buildings present on-site may provide suitable nesting and roosting habitat for protected and/or special-status birds and bats. The potential impacts of the project on these species are discussed below.

Special-Status Birds

As previously noted, trees located within and along the project site perimeter may provide nesting habitat for migratory birds as well as native nesting birds. If vegetation removal, demolition, and construction activities occur during the nesting season (February 1 through August 31), these activities could result in the destruction or abandonment of an active nest and loss of any eggs or younglings in the nest, which would constitute a significant adverse effect and a violation of the federal Migratory Bird Treaty Act and State Fish and Game code.

Mitigation Measures:

MM BIO-1.1:

- If construction is initiated during the non-breeding season (September 1 to January 31), then vegetation removal, building demolition and other construction may proceed with no restrictions.
- If initial building demolition, vegetation removal, and construction is proposed during the nesting season (February 1 to August 31), a focused survey for nesting raptors and other native birds shall be conducted by a qualified biologist within 14 days prior to the onset of construction in order to determine whether any active nests are present on the site and surrounding area within 250 feet of proposed construction. The survey shall be reconducted any time construction has been delayed or curtailed for more than 14 days during the nesting season.
- If no active nests are identified during the construction survey period, then building demolition, vegetation removal, and other construction may proceed with no restrictions.
- If active bird nests are found, an adequate setback shall be established by a qualified biologist, approved by the City Planning Division, around the nest location and construction activities restricted within this no-disturbance zone until the qualified biologist has confirmed that any young birds have fledged and are able to function outside the nest location. Required setback distances for the no-disturbance zone shall be based on input received from the CDFW and may vary depending on species and sensitivity to disturbance. As necessary, the no-disturbance zone shall be fenced with temporary orange construction fencing if construction is to be initiated elsewhere on the site outside this zone.
- A report of findings shall be prepared by the qualified biologist and submitted to the Director of Community Development or Director's designee for review and approval prior to initiation of construction during the nesting season (February 1 to August 31). The report shall either confirm absence of any active nests or should confirm that any young are located within a designated no-disturbance zone and construction can proceed. No report of findings is required if construction is initiated during the non-nesting season (September 1 to January 31) and continues uninterrupted according to the above criteria.

With implementation of MM BIO-1.1, the project's impact to birds nesting on or near the site would be less than significant.

Special-Status Bats

Trees located within and along the perimeter of the project site and cavities in the existing buildings may provide roosting habitat for special-status bats and other designated priority bat species, including the pallid bat and Townsend's western big-eared bat. Tree trimming/removal and demolition of the existing buildings could displace any roosting bats, if present. Destruction of active

roosts, particularly a maternity roost of a special-status bat species with a high or medium-high priority by the Western Bat Working Group, would constitute a significant adverse effect.

Mitigation Measures:

MM BIO-1.2: Adequate measures shall be taken to avoid roosting by special-status bat species as a result of tree removal and building demolition, specifically:

- To the extent feasible, any tree removal or trimming that is deemed necessary by a certified arborist to maintain tree health shall be conducted outside of the bat maternity season (i.e. generally avoiding tree removal or trimming April through October).
- Building demolition shall, to the extent feasible, be conducted outside of the bat maternity season (i.e. generally avoiding demolition April through October).
- If tree removal, trimming, or building demolition occurs within bat maternity season (i.e. generally April through October), a pre-construction bat roost assessment shall be conducted by a qualified biologist at least 14 days and no more than 30 days prior to tree removal or building demolition to determine if bats roosts are present that may be impacted by project activities.
- If special-status bat species or maternity roosts are detected during these surveys, a qualified biologist shall identify any additional measures required to protect the roosts, such as including avoidance of the roosts until the end of the maternity roosting season.
- Regardless of the timing of tree removal or trimming activities, all felled trees or large limbs shall 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.
- A report of findings shall be prepared by the qualified biologist and submitted to the Director of Community Development or Director's designee for review and approval prior to initiation of construction during the maternity roosting season (April through October). The report shall either confirm absence of any active maternity roosts or specify any additional measures necessary to protect roosts until the end of the maternity roosting season. No report of findings is required if construction is initiated during the non-maternity roosting season (November through March) and continues uninterrupted according to the above criteria.

With implementation of MM BIO-1.2, impacts to individual bats and non-special status individuals and colonies of bats would be avoided during project construction. **(Less than Significant Impact with Mitigation Incorporated)**

Impact BIO-2: The project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS. **(No Impact)**

As discussed in Section 3.4.1.3 Existing Conditions, no riparian habitat or sensitive natural communities are present within the project site. Therefore, since construction and operation of the proposed project would be constrained to the project site, the project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community. **(No Impact)**

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

Implementation of the project would result in the removal of the arroyo willow stands and meadow discussed in Section 3.4.1.3 Existing Conditions. Both willow stands are surrounded by upland plant species, located on steep slopes, and lack hydric soil conditions; therefore, they do not meet wetland criteria under federal or state wetland definitions. The Biological Resource Assessment (see Appendix D), Biological Peer Review (see Appendix F), and Wetland Assessment (see Appendix E) all agree that the approximately 865 square foot meadow in the southwest corner of the project site appears to contain wetland features; however, the Wetland Assessment documents that the small meadow is not a naturally occurring wetland, is isolated from natural drainages downstream, and is the result of deferred maintenance of the project site's drainage system. While the Biological Resource Assessment identifies the presence of wetland features, it does not reach a definitive conclusion about the meadow qualifying as a jurisdictional wetland and recommends a formal wetland delineation be performed prior to project implementation to allow the US Army Corp and/or the Regional Water Quality Control Board to determine whether to assert jurisdiction over the meadow as a wetland. The Biological Peer Review, however, agrees with the findings of the Wetland Assessment and concludes that the meadow would not qualify as a jurisdictional wetland under the Clean Water Act or Porter-Cologne Act. Based on the information presented regarding the origin and nature of the meadow, and consistent with the findings of the Biological Peer Review and Wetland Assessment, the City concludes that the meadow is not a formal wetland and, therefore, the removal of the meadow would not constitute a significant impact under CEQA and no mitigation is required to offset its loss. Thus, the project would not have a substantial adverse effect on state or federally protected wetlands. **(No Impact)**

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

As documented in Section 3.4.1.3 Existing Conditions, the project site is located in an urban area and has been extensively disturbed by past development, and is almost fully developed with buildings and impervious surfaces. No watercourses or other natural features are present that would serve as a movement corridor for migratory fish or wildlife species, or as a native wildlife nursery. The majority of trees and understory grasses, forbs, and other plants located on the perimeter of the project site would be preserved and continue to serve as habitat for local wildlife. Any wildlife present within the vicinity of the project site is already acclimated to human activity, and construction activities would not cause any significant impacts on wildlife movement in the area. For these reasons, the project would not interfere with fish and wildlife movement or in the use of native wildlife nursery sites. **(Less than Significant Impact)**

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

As discussed under Impact BIO-1, the project would mitigate potential impacts to nesting birds and bats to a less than significant level (consistent with General Plan policies LU-17 and LU-18). Additionally, the project would not conflict with the San Bruno Mountain Habitat Conservation Plan (refer to the discussion under Impact BIO-6), consistent with General Plan Policy RME-16. The project proposes to replace any trees removed during construction at a 2:1 ratio; however, since the trees are located on private property, the removal of these trees is not regulated by the City of Daly City and the City's Urban Forestry Ordinance. Off-site improvements (see Section 2.2.2.1 above) related to the project could result in the removal of street trees; however, the project would comply with the City's Urban Forestry Ordinance by replacing any removed street trees with a similar sized tree or through a fee payment directly to the City. Accordingly, the project would not conflict with any local policies or ordinances protecting biological resources. **(Less than Significant Impact)**

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

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

3.4.2.2 *Cumulative Impacts*

Impact BIO-C: The project would not result in a cumulatively considerable contribution to a cumulatively significant biological resources impact. **(Less than Significant Cumulative Impact with Mitigation Incorporated)**

The geographic area for cumulative impacts to biological resources includes the project site and its surrounding area because localized development would affect the same group of biological resources. The only cumulative projects within the vicinity of the project site are the Serramonte Shopping Center Expansion, located at 3 Serramonte Center, and the Serramonte Condominiums and Hotel project, located at 525-595 Serramonte Boulevard, both of which are adjacent to the northeast corner of the project site.

Candidate, Sensitive, or Special Status Species

As discussed under Impact BIO-1, the project would have a less than significant impact on candidate, sensitive, and special-status species with implementation of MM BIO-1.1 and MM BIO-1.2. Similar to the project, trees located at 3 Serramonte Center and 525-595 Serramonte Boulevard and cavities in existing buildings at 3 Serramonte Center may provide nesting and roosting habitat for birds and bats. Both the Serramonte Center Expansion and Serramonte Condominiums and Hotel projects would be subject to the same federal (FESA, MBTA), state (CESA, Fish and Game Code), and local policies and regulations in the City's General Plan protecting these species of birds and bats, and would be required to implement protective measures as warranted. Further, the project site, 3 Serramonte Center, and 525-595 Serramonte Boulevard are separated by a major intersection and intervening easements, which would reduce the potential for these projects to result in a cumulatively considerable impact to these species. Therefore, the project would not result in a cumulatively considerable contribution to a cumulatively significant impact on candidate, sensitive, or special-status species. **(Less than Significant Cumulative Impact with Mitigation Incorporated)**

Riparian Habitats or Sensitive Natural Communities

No riparian habitats or sensitive natural communities are present within the project site or adjacent parcels; therefore, the project would not result in a cumulatively considerable contribution to a cumulatively significant impact on riparian habitats or other sensitive natural communities. **(Less than Significant Cumulative Impact)**

Wetlands

As discussed under Impact BIO-3, the project would have no impact on state or federally protected wetlands. No wetlands are mapped within the cumulative project sites on the U.S. Fish and Wildlife National Wetlands Inventory, and these cumulative projects would be subject to the state and federal regulations protecting wetlands identified in Section 3.4.1.2 Regulatory Framework should any wetlands be discovered during the environmental review process.²⁰ Accordingly, the project would

²⁰ U.S. Fish and Wildlife Service. "National Wetlands Inventory". Accessed December 22, 2021. <https://www.fws.gov/wetlands/data/Mapper.html>

not result in a cumulatively considerable contribution to a cumulatively significant impact on state or federally protected wetlands. **(Less than Significant Cumulative Impact)**

Movement, Migration, or Use of Native Wildlife Nursery Sites

No watercourses or natural features are present within the project site or adjacent parcels that would serve as a movement corridor for migratory fish or wildlife species, or as a native wildlife nursery. Therefore, the project would not result in a cumulatively considerable contribution to a cumulatively significant impact fish and wildlife movement or in the use of native wildlife nursery sites. **(Less than Significant Cumulative Impact)**

Policies or Ordinances Protecting Biological Resources

As discussed under Impact BIO-5, the project would be in compliance with policies and ordinances protecting biological resources, specifically those outlined in the City's General Plan and Municipal Code. The cumulative projects identified in Table 3.0-1 would also be required to comply with these same policies, and therefore the project would not result in a cumulatively considerable contribution to a cumulatively significant conflict with local policies or ordinances protecting biological resources. **(Less than Significant Cumulative Impact)**

Habitat Conservation Plans

Neither the project site or other cumulative projects are located within an area covered by an adopted HCP, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, the project would not result in a cumulatively considerable contribution to a cumulatively significant conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. **(No Cumulative Impact)**

3.5 CULTURAL RESOURCES

The following discussion is based, in part, on a Historic Resources Evaluation prepared by Archaeological/Historical Consultants, dated October 2021. A copy of this report is attached to this EIR as Appendix G. The analysis is also based on a Cultural Resources Study prepared for the project by Tom Origer & Associates, dated February 2021. A copy of this report is on file at the City of Daly City Planning Division.

3.5.1 Environmental Setting

3.5.1.1 *Regulatory Framework*

Federal and State

National Historic Preservation Act

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

California Register of Historical Resources

The California Register of Historical Resources (CRHR) is administered by the State Office of Historic Preservation and encourages protection of resources of architectural, historical, archeological, and cultural significance. The CRHR identifies historic resources for state and local planning purposes and affords protections under CEQA. Under Public Resources Code Section 5024.1(c), a resource may be eligible for listing in the CRHR if it meets any of the NRHP criteria.²¹

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

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

²¹ California Office of Historic Preservation. “CEQA Guidelines Section 15064.5(a)(3) and California Office of Historic Preservation Technical Assistance Series #6.” Accessed August 31, 2020.
<http://www.ohp.parks.ca.gov/pages/1069/files/technical%20assistance%20bulletin%206%202011%20update.pdf>.

Senate Bill 18

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

Assembly Bill 52

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

Under AB 52, TCRs are defined as follows:

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

California Native American Historical, Cultural, and Sacred Sites Act

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

Public Resources Code Sections 5097 and 5097.98

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

Pursuant to Public Resources Code Section 5097.98, in the event of human remains discovery, no further disturbance is allowed until the county coroner has made the necessary findings regarding the origin and disposition of the remains. If the remains are of a Native American, the county coroner must notify the NAHC. The NAHC then notifies those persons most likely to be related to the Native

American remains. The code section also stipulates the procedures that the descendants may follow for treating or disposing of the remains and associated grave goods.

Local

Daly City 2030 General Plan

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

Policy/Task	Description
Policy LU-19.1	Archeological resources should be preserved where possible.
Task LU-19.1	Archeological resources are a valuable educational resource for the residents of the city. Every effort should be made to preserve them in their natural state when found or be excavated by professional archeologists for display in a museum.
Policy RME-19	Undertake measures to protect and preserve historic and archaeological resources.
Task RME-19.1	Comply with State statutes related to historical and archaeological resources.
Task RME-19.1	Serve as a leader in historic preservation by preserving, restoring, and reusing City-owned historic resources where feasible.

3.5.1.2 Existing Conditions

Archaeological Resources

The San Francisco Bay Area was historically inhabited by a Native American group known as the “Costanoan” or Ohlone over a period of 5,000 to 8,000 years prior to Spanish exploration and colonization of the region. According to the Northwest Information Center (NWIC), Native American resources in the northern part of San Mateo County have been found in close proximity to sources of water (including perennial and intermittent streams and springs), near the bay margin and its associated wetlands, along the coastal terraces and sheltered valleys, and near ecotones and other productive environments. The tribelet which inhabited the Daly City area lived primarily in two main inland villages located on the Colma and San Bruno Creeks and a seasonal village along the coast at Mussel Rock. At the time of European settlement, the project site was controlled by the Ramaytush linguistic group of the Ohlone/Costanoan people.

The project site is within an urbanized area of Daly City and is developed with the JUHSD campus, which is situated on an artificial flat that was created when the property was developed in 1969. The project site is located at what was once the headwaters of a small drainage that flowed east into Colma Creek. Prior to development of the project site, this drainage would have been the closest source of freshwater for nearby Ohlone/Costanoan people. No archaeological resources have been documented within a half-mile of the project site.

Historic Resources

The project site is currently developed with the JUHSD campus, which includes a main campus and storage bungalows (constructed in 1969), a General Education Department building (constructed in 1982), two one-story portables (constructed in 1998) and a Comcast relay station (constructed in 2002). Neither the project site or existing buildings are identified as a historic resource in the NRHP or CRHR, or identified as a property with potential historic value in the Daly City General Plan. The Historic Resources Evaluation prepared by Archaeological/Historical Consultants found none of the buildings to be an example of any unique architectural style or the work of a master architect or builder, nor were any structures determined to be associated with any significant person or local event in the area, and therefore the JUHSD campus does not meet the definition of an historic resource under CEQA. There are no documented historic resources within the vicinity of the JUHSD campus.

3.5.2 Impact Discussion

For the purpose of determining the significance of the project's impact on cultural resources, would the project:

- 1) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?
- 2) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?
- 3) Disturb any human remains, including those interred outside of dedicated cemeteries?

3.5.2.1 *Project Impacts*

Impact CUL-1:	The project would not cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5. (No Impact)
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The existing JUHSD campus is not listed in the National Register of Historic Places or the California Register of Historical Resources, or the local registry of historic resources reflected in the Daly City General Plan. While the main campus and storage bungalows are over 50 years in age, these buildings are of simple utilitarian design constructed with commonplace materials (steel, concrete, wood, tar, gravel) and are not an example of any unique architectural style or the work of a master architect or builder. Further, these buildings are not known to be associated with any significant person or local event in the area. There are no documented historic resources within the vicinity of the JUHSD campus. For these reasons, demolition of the JUHSD campus would not cause a substantial adverse change in the significance of a historical resource. **(No Impact)**

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

The project site has been previously disturbed and developed with the JUHSD campus as described under Section 3.5.1.2 Existing Conditions. No archaeological resources have been documented within a half-mile of the project site. However, based on the site's proximity to a historic freshwater source and the historic occupation of Daly City and the project site by the Ohlone/Costanoan people, the Cultural Resources Study identified a moderate sensitivity for subsurface archaeological resources to be encountered during construction-related ground disturbing activities (demolition, grading, excavation, etc.). The project could result in significant impacts to undiscovered subsurface archaeological resources if encountered during construction-related ground disturbing activities.

Mitigation Measures:

MM CUL-2.1: Undiscovered Archaeological Resources. If evidence of an archaeological site or other suspected cultural resource as defined by CEQA Guideline Section 15064.5, including darkened soil representing past human activity ("midden"), that could conceal material remains (e.g., worked stone, worked bone, fired clay vessels, faunal bone, hearths, storage pits, or burials) is discovered during construction related earth-moving activities, all ground-disturbing activity within 100 feet of the resources shall be halted and the City's Planning Manager shall be notified. The project sponsor shall hire a qualified archaeologist to conduct a field investigation. The City's Planning Manager shall consult with the archaeologist to assess the significance of the find. Impacts to any significant resources shall be mitigated to a less-than-significant level through data recovery or other methods determined adequate by a qualified archaeologist and that are consistent with the Secretary of the Interior's Standards for Archaeological documentation. Any identified cultural resources shall be recorded on the appropriate DPR 523 (A-J) form and filed with the NWIC.

MM CUL-2.2: Report of Archaeological Resources. If archaeological resources are identified, a final report summarizing the discovery of cultural materials shall be submitted to the City's Planning Manager prior to issuance of certificate of occupancy. This report shall contain a description of the mitigation program that was implemented and its results, including a description of the monitoring and testing program, a list of the resources found and conclusion, and a description of the disposition/curation of the resources.

Implementation of MM CUL-2.1 would ensure that any potentially undiscovered archaeological resources are identified and appropriately treated and protected by a qualified archaeologist in accordance with the Secretary of the Interior's standards. Mitigation addressing subsurface archaeological resources would be documented and enforced through implementation of MM CUL-2.2. Therefore, the project would not cause a substantial adverse change in the significance of an

archaeological resource pursuant to CEQA Guidelines Section 15064.5. **(Less than Significant Impact with Mitigation Incorporated)**

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

Due to the project site's history of prehistoric residential activities, human remains have the potential to be discovered during construction. If human remains are unearthed during project construction, damage to or destruction of human remains would be a potentially significant impact.

Mitigation Measures:

MM CUL-3.1: Human Remains. If human remains are discovered during project construction, all ground-disturbing activity within 100 feet of the resources shall be halted and the City's Planning Manager and the San Mateo County coroner shall be notified immediately, according to Section 5097.98 of the State Public Resources Code and Section 7050.5 of California's Health and Safety Code. If the remains are determined by the County coroner to be Native American, the Native American Heritage Commission (NAHC) shall be notified within 24 hours, and the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains. The project sponsor shall also retain a professional archaeologist with Native American burial experience to conduct a field investigation of the specific site and consult with the Most Likely Descendant, if any, identified by the NAHC. As necessary, the archaeologist may provide professional assistance to the Most Likely Descendant, including the excavation and removal of the human remains. The City of Daly City shall be responsible for approval of recommended mitigation as it deems appropriate, taking account of the provisions of State law, as set forth in CEQA Guidelines section 15064.5(e) and Public Resources Code section 5097.98. The project sponsor shall implement approved mitigation, to be verified by the City of Daly City, before the resumption of ground-disturbing activities within 100 feet of where the remains were discovered.

By following the process set forth in MM CUL-3.1, the project would ensure that any human remains encountered during ground-disturbing activities are appropriately identified and treated. **(Less than Significant Impact with Mitigation Incorporated)**

3.5.2.2 *Cumulative Impacts*

Impact CUL-C: The project would not result in a cumulatively considerable contribution to a cumulatively significant cultural resources impact. **(Less than Significant Cumulative Impact)**

The project would not impact historic resources, and so would not contribute to cumulative impacts to historic resources. With regard to archaeological resources, most development projects in Daly City would require a level of excavation and grading or other activities that may affect archaeological resources, including human remains. Each project is to complete its own literature review, as applicable, to determine the level of archeological and cultural sensitivity of its project site. However, all projects occurring within Daly City would be required to implement mitigation measures, as applicable, that would avoid impacts and/or reduce them to a less than significant level, consistent with CEQA requirements. Such measures consist of preliminary investigation prior to full excavation, avoidance measures during ground disturbance activities, and/or monitor during ground disturbance activities. Collection and evaluation of finds are also part of these conditions and/or mitigation measures. These projects would also be subject to federal, state, and county laws regulating cultural resources such as protocols of handling human remains, if found on the project site. For these reasons, the proposed project in combination with the cumulative scenario project would not result a significant cultural resources impact. **(Less than Significant Cumulative Impact)**

3.6 ENERGY

The following discussion is based, in part, on an air quality and greenhouse gas assessment prepared for the project by Illingworth & Rodkin, Inc. A copy of this report, dated June 17, 2022, is attached to this EIR as Appendix C.

3.6.1 Environmental Setting

3.6.1.1 *Regulatory Framework*

Federal and State

Energy Star and Fuel Efficiency

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

Renewables Portfolio Standard Program

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

Executive Order B-55-18 To Achieve Carbon Neutrality

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

California Building Standards Code

The Energy Efficiency Standards for Residential and Nonresidential Buildings, as specified in Title 24, Part 6 of the California Code of Regulations (Title 24), was established in 1978 in response to a legislative mandate to reduce California's energy consumption. Title 24 is updated approximately

every three years.²² Compliance with Title 24 is mandatory at the time new building permits are issued by city and county governments.²³

California Green Building Standards Code

CALGreen establishes mandatory green building standards for buildings in California. CALGreen was developed to reduce GHG emissions from buildings, promote environmentally responsible and healthier places to live and work, reduce energy and water consumption, and respond to state environmental directives. CALGreen covers five categories: planning and design, energy efficiency, water efficiency and conservation, material and resource efficiency, and indoor environmental quality.

Advanced Clean Cars Program

CARB adopted the Advanced Clean Cars program in 2012 in coordination with the EPA and National Highway Traffic Safety Administration. The program combines the control of smog-causing pollutants and GHG emissions into a single coordinated set of requirements for vehicle model years 2015 through 2025. The program promotes development of environmentally superior passenger cars and other vehicles, as well as saving the consumer money through fuel savings.²⁴

Local

City of Daly City General Plan

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

Policy/Task	Description
Policy HE-23	Gradually increase energy and water efficiency standards for all new and existing housing while minimizing the costs of such standards.
Task HE-23.1	Develop enhanced residential energy efficiency standards (Title 24, California Administrative Code) in all new residential construction which exceeds State-mandated requirements by five percent in 2015, ten percent in 2020, and twenty percent in 2030.
Task HE-23.2	Establish energy and water efficiency upgrade programs that promote energy and water efficiency upgrades in all existing residential buildings. Energy efficiency upgrades promoted as part of this program could include upgrades such as attic

²² California Building Standards Commission. "California Building Standards Code." Accessed December 1, 2021. <https://www.dgs.ca.gov/BSC/Codes#@ViewBag.JumpTo>.

²³ California Energy Commission (CEC). "2019 Building Energy Efficiency Standards." Accessed December 1, 2021. <https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency>.

²⁴ California Air Resources Board. "The Advanced Clean Cars Program." Accessed December 1, 2021. <https://www.arb.ca.gov/msprog/acc/acc.htm>.

Policy/Task	Description
	insulation, programmable thermostats, heating duct insulation, and water heater insulation. Water efficiency upgrades could include the installation of low-flow shower heads, where feasible, and retrofit of existing toilets to meet low-flush requirements as established by the City. Examples of programs developed as a part of this task could provide financial incentives (e.g., rebates, appliance buy-back, and similar programs) aimed at providing strong incentives to residential building owners to use the programs.
Policy HE-24	Mandate the inclusion of green building techniques into most new construction.
Policy HE-28	Promote alternative sources of energy in all homes.

Daly City's Green Vision

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

Daly City Municipal Code

The City recently adopted Ordinance 1448, which requires all new residential buildings to be all electric and use no natural gas.²⁵ The City's Recycling and Diversion of Construction and Demolition ordinance (Municipal Code 15.64) requires that construction and demolition projects recycle or reuse 60 percent of the waste generated from the project. This ordinance is consistent with the requirements for construction and demolition debris diversion in CALGreen. Many of the construction materials, such as concrete, asphalt, asphalt singles, gypsum wallboard, wood and metals, can be reused or recycled, thus prolonging our supply of natural resources and potentially saving money in the process.

3.6.1.2 Existing Conditions

Total energy usage in California was approximately 7,802 trillion British thermal units (Btu) in the year 2019, the most recent year for which this data was available.²⁶ Out of the 50 states, California is ranked second in total energy consumption and 46th in energy consumption per capita. The breakdown by sector was approximately 19 percent (1,456 trillion Btu) for residential uses, 19 percent (1,468 trillion Btu) for commercial uses, 23 percent (1,805 trillion Btu) for industrial uses,

²⁵ City of Daly City. *Daly City Municipal Code Ordinance No. 1448*. May 10, 2021.

²⁶ United States Energy Information Administration. "State Profile and Energy Estimates, 2019." Accessed December 1, 2021. <https://www.eia.gov/state/?sid=CA#tabs-2>.

and 39 percent (3,073 trillion Btu) for transportation.²⁷ This energy is primarily supplied in the form of natural gas, petroleum, nuclear electric power, and hydroelectric power.

Electricity

Electricity in San Mateo County in 2020 was consumed primarily by the non-residential sector (60 percent), with the residential sector consuming 40 percent. In 2020, a total of approximately 4,167 GWh of electricity was consumed in San Mateo County.²⁸

Peninsula Clean Energy (PCE) is a public and locally controlled electricity provider for the County of San Mateo. Electricity provided by PCE is delivered through PG&E transmission lines. Commercial and residential customers in San Mateo County are included in the PCE service area and can choose to have 50 to 100 percent of their electricity supplied from carbon-free and renewable sources. Customers are automatically enrolled in the ECOplus plan, which generates its electricity from 100 percent carbon-free sources, with at least 50 percent from renewable sources. Customers have the option to enroll in the ECO100 plan, which generates its electricity from 100 percent carbon-free, renewable sources.²⁹ The project site currently uses approximately 1.7 GWh of electricity per year.

Natural Gas

PG&E provides natural gas services within the City of Daly City. In 2020, approximately two percent of California's natural gas supply came from in-state production, while the remaining supply was imported from other western states and Canada.³⁰ In 2019 residential and commercial customers in California used 33 percent of the state's natural gas, power plants used 26 percent, the industrial sector used 35 percent, and other uses used six percent.³¹ Transportation accounted for one percent of natural gas use in California. In 2019, San Mateo County used approximately nine percent of the state's total consumption of natural gas.³² The project site currently uses approximately 2,788,100 kBtu of natural gas per year.

Fuel for Motor Vehicles

In 2019 (pre-Covid), 15.4 billion gallons of gasoline were sold in California.³³ The average fuel economy for light-duty vehicles (autos, pickups, vans, and sport utility vehicles) in the United States has steadily increased from about 13.1 miles per gallon (mpg) in the mid-1970s to 25.4 mpg in

²⁷ Ibid.

²⁸ California Energy Commission. Energy Consumption Data Management System. "Electricity Consumption by County." Accessed December 1, 2021. <http://ecdms.energy.ca.gov/elecbycounty.aspx>.

²⁹ Sources: 1) Peninsula Clean Energy. "Frequently Asked Questions." Accessed December 1, 2021. <https://www.peninsulacleanenergy.com/faq/>. 2) Peninsula Clean Energy. "Energy Choices." Accessed December 1, 2021. <https://www.peninsulacleanenergy.com/faq/>.

³⁰ California Gas and Electric Utilities. 2020 *California Gas Report*. Accessed August 2, 2021. https://www.socalgas.com/sites/default/files/2020-10/2020_California_Gas_Report_Joint_Utility_Biennial_Comprehensive_Filing.pdf.

³¹ United States Energy Information Administration. "State Profile and Energy Estimates, 2019." Accessed August 2, 2021. <https://www.eia.gov/state/?sid=CA#tabs-2>.

³² California Energy Commission. "Natural Gas Consumption by County." Accessed August 2, 2021. <http://ecdms.energy.ca.gov/gasbycounty.aspx>.

³³ California Department of Tax and Fee Administration. "Net Taxable Gasoline Gallons." Accessed December 1, 2021. <https://www.cdtfa.ca.gov/dataportal/dataset.htm?url=VehicleTaxableFuelDist>.

2020.³⁴ Federal fuel economy standards have changed substantially since the Energy Independence and Security Act was passed in 2007. That standard, which originally mandated a national fuel economy standard of 35 miles per gallon by the year 2020, was updated in March 2020 to require all cars and light duty trucks achieve an overall industry average fuel economy of 40.4 mpg by model year 2026.^{35,36} The existing uses vehicles miles traveled (VMT) is estimated to be 1,904,889.³⁷ Assuming a 25.4 mpg, the trips from existing uses require use approximately 75,000 gallons of fuel per year.

3.6.2 Impact Discussion

For the purpose of determining the significance of the project's impact on energy, would the project:

- 1) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?
- 2) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

3.6.2.1 *Project Impacts*

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

Construction of the project would require energy for the manufacture and transportation of building materials, site preparation and grading, and construction of the proposed Parcel B Development project and future buildout of the proposed Precise Plan. Construction processes are generally designed to be efficient in order to avoid excess monetary costs. That is, equipment and fuel are not typically used wastefully on the site because of the added expense associated with renting the equipment, as well as maintenance and fuel. In addition, as discussed in Section 3.3 Air Quality, the project would implement mitigation measures to minimize the idling of construction equipment thus reducing the potential for energy waste. Further, the project would recycle at least 60 percent of construction and demolition waste. For these reasons, construction of the project would not use energy in a wasteful manner.

Operational

The proposed project would increase the density/intensity of uses on the site and would result in a net increase in energy use. Operation of the project would consume energy for multiple purposes

³⁴ United States Environmental Protection Agency. "The 2021 EPA Automotive Trends Report: Greenhouse Gas Emissions, Fuel Economy, and Technology since 1975." November 2021.
<https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockkey=P1010U68.pdf>

³⁵ United States Department of Energy. *Energy Independence & Security Act of 2007*. Accessed December 1, 2021.
<http://www.afdc.energy.gov/laws/eisa>.

³⁶ Public Law 110-140—December 19, 2007. *Energy Independence & Security Act of 2007*. Accessed December 1, 2021. <http://www.gpo.gov/fdsys/pkg/PLAW-110publ140/pdf/PLAW-110publ140.pdf>.

³⁷ Illingworth & Rodkin, Inc. *Serramonte Del Rey Campus Redevelopment Project Air Quality and Greenhouse Gas Assessment*. June 17, 2022.

including, building heating and cooling, lighting for the proposed buildings and parking garages, and operation of appliances and electronics. Energy would also be consumed during each vehicle trip generated by residents, visitors, and employees. The project's estimated energy demand is summarized in Table 3.6-1.

Table 3.6-1: Estimated Annual Project Energy Demand			
	Net Electricity (GWh)	Net Natural Gas (kBtu)	Net Gasoline* (gallons)
Existing	1.70	2,788,100	75,000
Project	7.65	63,840	734,326
Note: *Gasoline demand was calculated by dividing the project's estimated VMT by 25.4 mpg (Source: Illingworth & Rodkin, Inc. <i>Serramonte Del Rey Campus Redevelopment Project Air Quality and Greenhouse Gas Assessment</i> . June 17, 2022.)			

To ensure that energy is not wasted or unnecessarily consumed, the project would comply with Title 24 and CALGreen energy efficiency measures, as well as City of Daly City Green Vision requirements and Recycling and Diversion of Construction and Demolition Ordinance. These various requirements would reduce project energy demand by ensuring that the project would be built to current energy efficiency standards, include energy efficient appliances, and reduce construction waste disposal trips. As noted above, the City recently adopted Ordinance 1448, which requires all new residential buildings to be all electric and use no natural gas. The project is also on an infill site that encourages alternatives to single-vehicle occupancy trips by being proximate to transit and being on a site adequately served by pedestrian and bicycle facilities. For these reasons, operation of the project would not use energy in a wasteful manner. **(Less than Significant Impact)**

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

According to the 2019 Integrated Energy Policy Report, the state is working towards decarbonizing the energy system and moving towards a 100 percent carbon-free system by 2045.³⁸ The project would obtain energy from the PCE which provides 50 to 100 percent carbon free electricity to the project site. The project would result in an increase in demand on existing energy resources; however, the project is required to comply with applicable regulations and City policies that would conserve energy and water, and reduce fuel consumption and waste generation. For these reasons, the proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. **(Less than Significant Impact)**

³⁸ California Energy Commission. *2019 Integrated Energy Policy Report*. 2019.

3.6.2.2 *Cumulative Impacts*

Impact EN-C: The project would not result in a cumulatively considerable contribution to a cumulatively significant energy impact. **(Less than Significant Cumulative Impact)**

By its nature, energy is a cumulative resource, and demands on energy supplies are cumulative. Past, present, and future development projects contribute to the state's energy impacts. If the project is determined to have a significant energy impact, it is concluded that the impact is cumulatively considerable. As discussed under Impact EN-1 and Impact EN-2 above, the project itself would not result in significant energy impacts. Further, all projects in Daly City and adjacent cities are required to meet CALGreen and Title 24 energy efficiency requirements, thus lessening overall energy demand. Therefore, the project would not result in a considerable contribution to a significant cumulative energy impact. **(Less than Significant Cumulative Impact)**

3.7 GEOLOGY AND SOILS

The following discussion is based, in part, on a Preliminary Geotechnical Investigation Report prepared for the project by Slate Geotechnical Consultants, Inc. A copy of this report, dated April 20, 2021, is attached to this EIR as Appendix H.

3.7.1 Environmental Setting

3.7.1.1 *Regulatory Framework*

State

Alquist-Priolo Earthquake Fault Zoning Act

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

Seismic Hazards Mapping Act

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

California Building Standards Code

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

California Division of Occupational Safety and Health Regulations

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

Public Resources Code Section 5097.5

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

Local

Daly City 2030 General Plan

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

Policy	Description
Policy SE-1.1	Continue to investigate the potential for seismic and geologic hazards as part of the development review process and maintain this information for the public record. Update Safety Element maps as appropriate.
Policy SE-1.2	Require site specific geotechnical, soils, and foundation reports for development proposed on sites identified in the Safety Element and its Geologic and Hazard Maps as having moderate or high potential for ground failure.
Policy SE-1.3	Permit development in areas of potential geologic hazards only where it can be demonstrated that the project will not be endangered by, nor contribute to, the hazardous condition on the site or on adjacent properties. All proposed development is subject to the City's Zoning Ordinance and Building Codes.
Policy SE-1.4	Prohibit development—including any land alteration, grading for roads and structural development—in areas of slope instability or other geologic concerns unless mitigation measures are taken to limit potential damage to levels of acceptable risk.
Policy SE-6.1	Regulate building construction practices to prevent hazardous structures and assure structural safety. Measures may include requiring conformance to an accepted set of construction standards, authorizing inspection of suspected dangerous structures, discontinuing improper construction activities, and eliminating hazardous conditions.

Daly City Municipal Code

Title 15 of the Daly City Municipal Code includes Chapter 15.62 “Grading, Erosion, and Sediment Control”, which is intended to provide for safe grading operations, to safeguard public health and property, and to preserve and enhance the natural environment, including, but not limited to, water quality, by regulating site clearing, grading and erosion control on all public and private properties. Among other conditions, Chapter 15.62 requires projects to prepare an erosion and sediment control

plan, an engineering geology report, and when requested, a soil/geotechnical engineering report in order to address geological and soils related hazards and engineering issues.

3.7.1.2 Existing Conditions

Regional Geology

The project site and surrounding area is located within the Coast Ranges physiographic province, a series of northwest-trending mountain ranges and valleys that extend along much of the coastal region of California. Geologic mapping indicates that the project site is underlain by the late Pliocene- to early Pleistocene-age Merced Formation, which consists of weak, friable sandstone, siltstone, and claystone, with local fossiliferous beds that are well-cemented.

Seismicity and Seismic Hazards

The entire San Francisco Bay Area is located within the San Andreas Fault Zone, a complex of active faults with the potential to generate earthquakes of magnitude 7.0 or greater. The overall probability of a magnitude 6.7 or greater earthquake on a fault in the greater Bay Area in the next 30 years is estimated at 63 percent. The closest major active fault segments include the San Andreas Fault Peninsula segment, located 0.6 miles southwest of the project site, the Pilarcitos Fault (located 4.5 miles southwest), the San Gregorio Fault North segment (located five miles southwest), and the Point Reyes Fault (located 6.3 miles west).

The project site is not within an Alquist-Priolo Fault Zone.³⁹ Based on hazard maps prepared for the Daly City General Plan, the project site is projected to experience very violent shaking during a seismic event, is at very low risk of liquefaction, and at moderate risk of landsliding.⁴⁰ Additionally, as the project site is considered to be at very low risk of liquefaction, it is also considered to be at low risk of lateral spreading.⁴¹

Soils and Topography

Based on subsurface borings and cone penetration tests completed in 2019 for the project site, underlying soils are a mixture of fill materials and native soil and weathered rock. Fill materials on site consist of variable compositions of sand, clayey sand, and sandy clay ranging in density from medium dense to very dense and consistency from medium stiff to hard. Fill materials are expected to be up to 140 feet in thickness in areas to the west and south of the existing buildings on-site. The native soil and weathered rock encountered consisted of clayey sand and sandy clay ranging in density and consistency from dense to very dense and stiff to hard. Soils tested during subsurface borings had a Plasticity Index (PI) of six.

³⁹ California Geological Survey. *California Earthquake Hazards Zone Application (EQ ZAPP)*. Date accessed September 22, 2020. <https://maps.conservation.ca.gov/cgs/EQZApp/app/>

⁴⁰ Liquefaction is a temporary loss of shear strength as a result of increased pore pressure due to strong ground shaking or cyclic loading. Liquefaction is defined by saturation of soil and loss of cohesion. It is associated with loose, high-plasticity soils and near-surface groundwater levels.

⁴¹ Lateral spreading typically occurs as a form of horizontal displacement of relatively flat-lying soil toward an open or “free” face such as an open body of water, channel, or excavation. This movement is often associated with liquefaction and commonly occurs on gentle slopes in seismically active regions. Lateral spread presents a significant hazard to the integrity of buildings and other structures.

The project site underwent mass grading during the original development of the site between 1966 and 1969, with significant cut and leveling of a high knoll on the eastern half of the site, and mass excavation of existing ravine walls up to 80 feet deep and hillside cuts along the western boundary of the site. As a result, the project site overall is southeast sloping, with the western portion of the site featuring a 100-foot high moderately sloped hillside cut that descends to the relatively flat existing Serramonte Del Rey campus, which extends east to a 65- to 50-foot high slope that descends to Callan Boulevard.

Groundwater

No groundwater was encountered during the subsurface borings completed in 2019 on the project site, which extended between 29 and 50 feet below ground surface (bgs). For purposes of this EIR, groundwater in the project area vicinity is projected to flow generally south and east towards the San Francisco Bay at a depth of greater than 50 feet bgs.⁴² Fluctuations in groundwater levels occur due to many factors including seasonal fluctuation, underground drainage patterns, regional fluctuations, and other factors.

Paleontological Resources

The project site is within the Merced Formation of the Franciscan complex, which was formed during the early to late Pliocene age of the Neogene period, and has a high sensitivity for paleontological resources. At a regional level, the project site is within the Pilarcitos stratigraphic area, which has approximately nine historic fossil collection sites, the closest of which is Mussel Rock, approximately one mile west of the project site. Fossils have been discovered elsewhere in Daly City along the coastline and on the shores of Lake Merced, but have not been discovered inland within Daly City.⁴³ As discussed above, the project site underwent mass grading and is underlain by fill, therefore, paleontological resources are unlikely to be found near the ground surface.

3.7.2 Impact Discussion

For the purpose of determining the significance of the project's impact on geology and soils, would the project:

- 1) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault (refer to Division of Mines and Geology Special Publication 42)?
 - Strong seismic ground shaking?
 - Seismic-related ground failure, including liquefaction?
 - Landslides?
- 2) Result in substantial soil erosion or the loss of topsoil?

⁴² Strata Environmental Services, Inc. *Phase I Environmental Site Assessment, Serramonte del Rey Campus*. February 2020.

⁴³ Macrostrat. "Macrostrat Geologic Map". Accessed September 14, 2021.
<https://macrostrat.org/map/#/z=1.5/x=16/y=23/bedrock/lines/>

- 3) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?
- 4) Be located on expansive soil, as defined in the current California Building Code, creating substantial direct or indirect risks to life or property?
- 5) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?
- 6) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?

3.7.2.1 *Project Impacts*

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

Fault Rupture

As discussed under Section 3.7.1.2 Existing Conditions, the project site is not within an Alquist-Priolo Fault Zone. As the nearest major active fault segment is located 0.6 miles southwest and no known faults intersect the study area, fault rupture is not anticipated to occur within the project site. As such, the project would not result in any substantial adverse effects associated with fault ruptures.

Seismic Ground Shaking

As discussed under Section 3.7.1.2 Existing Conditions, the project site is located within the seismically active San Andreas Fault Zone. During a seismic event, the project site may experience very violent ground shaking. Consistent with the findings of the Daly City 2030 General Plan Environmental Impact Report (General Plan EIR), compliance with the building codes and construction standards established by the CBC as required by law would be sufficient to protect against building collapse and major injuries during a seismic event.⁴⁴ The project would comply with current CBC building codes and standards and be constructed in accordance with the recommendations of a site-specific geotechnical investigation (as required by the CBC) and the engineering geology report prepared as required by Chapter 15.62 of the Daly City Municipal Code. For these reasons, the project would not result in substantial adverse effects associated with seismic ground shaking.

⁴⁴ City of Daly City. *General Plan Update Draft Environmental Impact Report*. October 2012. Page 3.5-15.

Liquefaction and Lateral Spreading

As discussed under Section 3.7.1.2 Existing Conditions, the project site is at a very low risk of liquefaction, and therefore at low risk of lateral spreading. The Geotechnical Investigation concluded that due to presence of stiff clay zones and the depth of groundwater (> 50 feet bgs), the project site was not at risk of liquefaction and associated effects. Further, the project as previously mentioned would comply with current CBC building codes and standards and be constructed in accordance with the recommendations of the site-specific geotechnical investigation and engineering geology report. As such, the project would not result in substantial adverse effects associated with liquefaction, lateral spreading, and other related phenomenon.

Landslides

As discussed under Section 3.7.1.2 Existing Conditions, the project site is mapped within an area with a moderate landslide risk. However, no landslide areas or landslide deposits have been mapped in the vicinity of the project site, and debris flow probability maps prepared by San Mateo County show that the area has a very low probability (< five percent) for debris flow failures. Based on bedrock type, landslide susceptibility, and lack of observed landslides in the vicinity, the Geotechnical Investigation (refer to Appendix H) concluded that the site-specific potential for seismically-induced landsliding to occur was low, and provided recommendations addressing the western and eastern slopes. As noted above, the project would comply with current CBC building codes and standards, and be constructed in accordance with the recommendations of the site-specific geotechnical investigation and engineering geology report. The General Plan EIR concluded that compliance with aforementioned codes, standards, and reports would reduce adverse effects associated with seismically induced landslides to a less than significant level.⁴⁵ **(Less than Significant Impact)**

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

Construction-related ground disturbing activities (demolition, grading, excavation, etc.) proposed by the project are expected to result in the exposure of soil to wind and water erosion. If managed improperly, construction could result in substantial soil erosion or loss of topsoil.

The City's National Pollutant Discharge Elimination System (NPDES) Municipal Permit and Chapter 15.62 of the City's Municipal Code are the City's primary means of enforcing erosion control measures through the grading and building permit process. Consistent with the findings of the General Plan EIR, compliance with the erosion control provisions included in the NPDES Municipal Permit and the erosion and sediment control plan required by Chapter 15.62 of the Municipal Code would ensure that the project would not result in substantial soil erosion or loss of topsoil.⁴⁶ **(Less than Significant Impact)**

⁴⁵ Ibid.

⁴⁶ Ibid. Page 3.5-17.

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

As discussed under Impact GEO-1, the Geotechnical Investigation (refer to Appendix H) concluded that the project site is not unstable or likely to become unstable during a seismic event. Furthermore, the project would be required by law to comply with current CBC building codes and standards and be constructed in accordance with the recommendations of the site-specific geotechnical investigation and engineering geology report, which would ensure that the project would not exacerbate the risk of ground failure, including liquefaction, lateral spreading, landsliding, and other related phenomenon. As such, the project would not result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. **(Less than Significant Impact)**

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

Pursuant to the CBC, soils with a PI of 15 or less are not considered expansive, therefore the project would not be located on expansive soil. Additionally, as discussed under Impact GEO-1, the geologic foundation of the project site is at a less than substantial risk of ground failure. By conforming with current CBC building codes and standards and the recommendations of the site-specific geotechnical investigation and the engineering geology report, the project would not create direct or indirect risks to life or property. **(Less than Significant Impact)**

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

The proposed project would dispose of wastewater via lateral connections to the City's sewer system and would not require the use of septic tanks or alternative wastewater disposal systems. **(No Impact)**

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

The project site has previously been extensively developed with the JUHSD campus. Additionally, the project site is not on or adjacent to the Pacific coastline or the shores of Lake Merced where fossils have been previously encountered in Daly City, and there is no evidence of paleontological resources (e.g. the presence of rock outcroppings) on the site. As such, there is a low probability of that the project would result in the discovery of subsurface paleontological resources. Nonetheless, construction-related ground disturbing activities could result in significant impacts, if any unknown unique paleontological resource or site or unique geological feature resources were encountered.

Mitigation Measure: The project will be required to implement the following mitigation measure to reduce potential impacts to paleontological resources to a less than significant level:

MM GEO-6.1: Unique Paleontological and/or Geologic Features and Reporting. Should a unique paleontological resource or site or unique geological feature be identified at the project site during any phase of construction, all ground disturbing activities within 25 feet shall cease and the City's Planning Director notified immediately. A qualified paleontologist shall evaluate the find and prescribe mitigation measures to reduce impacts to a less than significant level. Work may proceed on other parts of the project site while mitigation for paleontological resources or geologic features is implemented. Upon completion of the paleontological assessment, a report shall be submitted to the City and, if paleontological materials are recovered, a paleontological repository, such as the University of California Museum of Paleontology.

Implementation of MM GEO-6.1 would ensure that any paleontological resource or unique geological feature encountered during project construction would be identified and subsequently evaluated and protected in accordance with California Public Resources Code Section 5097.5. As such, impacts to unique paleontological resources would be less than significant. **(Less than Significant Impact with Mitigation Incorporated)**

3.7.2.2 Cumulative Impacts

Impact GEO-C: The project would not result in a cumulatively considerable contribution to a cumulatively significant geology and soils impact. **(Less than Significant Cumulative Impact with Mitigation Incorporated)**

The cumulative projects shown in Table 3.0-1 would be subject to similar geology, soils, and seismicity conditions as the proposed project. All cumulative projects occurring within Daly City would implement standard permit conditions related to geologic hazards and would be constructed consistent with the CBC and site-specific geotechnical investigations in order to avoid impacts from seismicity and geology and soils hazards, and/or reduce them to a less than significant level. Projects in the cumulative scenario would also be subject to similar CEQA requirements and mitigation measures as the proposed project with regard to avoidance and lessening of paleontological impacts. For these reasons, the cumulative projects, including the proposed project, would not result in significant cumulative geology and soils impacts. **(Less than Significant Cumulative Impact with Mitigation Incorporated)**

3.8 GREENHOUSE GAS EMISSIONS

The following discussion is based, in part, on an air quality and greenhouse gas assessment prepared for the project by Illingworth & Rodkin, Inc. A copy of this report, dated June 17, 2021, is attached to this EIR as Appendix C.

3.8.1 Environmental Setting

3.8.1.1 *Background Information*

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

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

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

3.8.1.2 *Regulatory Framework*

State

Assembly Bill 32

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

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

Senate Bill 375

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

Consistent with the requirements of SB 375, the Metropolitan Transportation Commission (MTC) partnered with the Association of Bay Area Governments (ABAG), BAAQMD, and the Bay Conservation and Development Commission to prepare the region's Sustainable Communities Strategy (SCS) as part of the Regional Transportation Plan process. The SCS is referred to as Plan Bay Area 2050. Plan Bay Area 2050 establishes a course for reducing per capita GHG emissions through the promotion of compact, high-density, mixed-use neighborhoods near transit, particularly within identified Priority Development Areas (PDAs).

Regional

2017 Clean Air Plan

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

CEQA Air Quality Guidelines

The BAAQMD's CEQA Air Quality Guidelines do not use quantified thresholds for projects that are in a jurisdiction with a qualified GHG reductions plan (i.e., a Climate Action Plan). The plan has to address emissions associated with the period that the project would operate (e.g., beyond year 2020). For quantified emissions, the guidelines recommended a GHG threshold of 1,100 metric tons or 4.6 metric tons (MT) per capita. These thresholds were developed based on meeting the 2020 GHG

targets set in the scoping plan that addressed AB 32. Development of the project would occur beyond 2020, so a threshold that addresses a future target is appropriate. Although BAAQMD has not published a quantified threshold for 2030 yet, this EIR utilizes an efficiency metric of 2.8 MT CO₂e/year/service population and a bright-line threshold of 660 MT CO₂e/year based on the GHG reduction goals of EO B-30-15. The service population metric of 2.8 is calculated for 2030 based on the 1990 inventory and the projected 2030 statewide population and employment levels. The 2030 bright-line threshold is a 40 percent reduction of the 2020 1,100 MT CO₂e/year threshold.

Local

Daly City General Plan

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

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

Daly City's Green Vision

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

Daly City Municipal Code

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

Ordinance 1448: This ordinance requires all new residential buildings to be all electric and use no natural gas.⁴⁷

⁴⁷ City of Daly City. *Daly City Municipal Code Ordinance No. 1448*. May 10, 2021.

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

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

3.8.1.3 *Existing Conditions*

GHG emissions are generated from vehicles entering and leaving the site and from heating, cooling, and lighting of the existing buildings, as well as water used by current site users and wastewater generated on-site. The project site currently generates approximately 1,093 MT of CO₂e annually. For the purposes of this analysis, the Parcel A development project is assumed to be not built/occupied; therefore, it is not included in existing conditions. Parcel A is included as part of the operational emissions for the proposed project.

3.8.2 Impact Discussion

For the purpose of determining the significance of the project's impact on greenhouse gas emissions, would the project:

- 1) Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?
- 2) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs?

3.8.2.1 *Project Impacts*

Impact GHG-1:	The project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. (Less than Significant Impact)
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GHG emissions associated with the project would occur over the short-term from construction activities, as well as operational emissions over the long term (associated with vehicular traffic within the project vicinity, the generator, energy and water usage, wastewater, and solid waste disposal). GHG emissions for the proposed project were analyzed using the methodology recommended in the BAAQMD CEQA Air Quality Guidelines. CalEEMod was used to predict GHG emissions from the project (as detailed in Appendix C).

Construction Emissions

GHG emissions associated with construction of Parcel B-F, based on construction data provided by the project applicant, were computed by CalEEMod to be 3,101 MT of CO₂e. These are the emissions from on-site operation of construction equipment, vendor and hauling truck trips, and worker trips. Neither the City nor BAAQMD have an adopted threshold of significance for construction-related GHG emissions, though BAAQMD recommends quantifying emissions and disclosing that GHG emissions would occur during construction. For these reasons, any impact would be less than significant.

Operational Emissions

Project operation would generate GHGs primarily through electricity generation/use and generation of vehicle trips. At full buildout and occupancy of the Precise Plan Parcels A-F, net operational GHG emissions from the project are estimated to be 5,585 MT of CO₂e for 2030, which exceeds the 2030 BAAQMD threshold of 660 MT/year of CO₂e (see Table 3.8-1). Land use projects with emissions above the 660 MT/year threshold are then subject to the GHG efficiency threshold of 2.8 MT per year per capita (MT/year/capita) to determine impact significance. For purposes of calculating per service population emissions, gross project GHG emissions are used, rather than the net GHGs used for establishing ‘brightline’ emissions. The project service population efficiency rate is based on the number of future residents. For this project, the number of future residents was estimated by multiplying the total number of units (i.e., 1,235 units) by the persons per household rate for the City of Daly City found in the California Department of Finance Population and Housing Estimate report.⁴⁸ Using the 3.33-person per household 2020 rate, the number of future residents was estimated to be 4,113 residents.

Table 3.8-1: Annual GHG Emissions (CO₂e) in Metric Tons		
Source Category	Existing Conditions in 2022	Proposed Project in 2030
Area	0	15
Energy Consumption	311	3
Mobile	684	6,315
Solid Waste Generation	55	295
Water Usage	43	50
Total	1,093	6,678
Net Emissions		5,585
<i>Significance Threshold</i>		660
Per Service Population Emissions (MT of CO₂e/year/service population)		1.62
<i>Significance Threshold</i>		2.8

⁴⁸ State of California, Department of Finance, E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2021 with 2010 Census Benchmark. Sacramento, California. Accessed May 5, 2022.
<https://dof.ca.gov/forecasting/demographics/estimates/estimates-e5-2010-2021/>.

Table 3.8-1: Annual GHG Emissions (CO ₂ e) in Metric Tons		
Source Category	Existing Conditions in 2022	Proposed Project in 2030
(MT of CO ₂ e/year/service population)		
Threshold Exceeded?		No

As shown in Table 3.8-1, the proposed project would not exceed the per capita 2030 threshold of 2.8 MT of CO₂e/year/service population; therefore, the project would meet the GHG reduction target set by SB 32 and not result in a significant GHG emissions impact. **(Less than Significant Impact)**

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

2017 Climate Action Plan

As discussed in Section 3.3 Air Quality, the project is consistent with the 2017 CAP because it supports the primary goals of the 2017 CAP (by providing increased density in a transit priority area) and does not exceed thresholds for greenhouse gas emissions (see Table 3.8-1 above).

Daly City General Plan

The project would be consistent with the City's General Plan policies [specifically Policy HE-23 of increasing energy efficiency standards in new and existing housing developments], Green Vision, and Green Building Ordinance because the project proposes to be constructed in compliance with the current California Green Building Standards Code (Title 24), which requires efficient windows, insulation, lighting, ventilation systems, and other features that reduce water and energy consumption. As noted previously, the City recently adopted Ordinance 1448, which requires all new residential buildings to be all electric and use no natural gas, which would further reduce GHG emissions.

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

3.8.2.2 Cumulative Impacts

Impact GHG-C: The project would not result in a cumulatively considerable contribution to a cumulatively significant GHG emissions impact. **(Less than Significant Cumulative Impact)**

GHG emissions have a broader, global impact; therefore, if a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable. As discussed in Impact

GHG-1, the project would not result in significant GHG impacts by the year 2030 and would meet the GHG reduction target set by SB 32. Therefore, the project would not have a cumulatively considerable contribution to a significant cumulative GHG emissions impact. **(Less than Significant Cumulative Impact)**

3.9 HAZARDS AND HAZARDOUS MATERIALS

The following discussion is based, in part, on a Phase I Environmental Site Assessment (ESA) prepared for the project by Strata Environmental Services, Inc. A copy of this report, dated February 2020, is attached to this EIR as Appendix I.

3.9.1 Environmental Setting

3.9.1.1 *Regulatory Framework*

Overview

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

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

Federal and State

Federal Aviation Regulations Part 77

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

Resource Conservation and Recovery Act

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

The Federal Hazardous and Solid Waste Amendments (HSWA) are the 1984 amendments to RCRA that focused on waste minimization, phasing out land disposal of hazardous waste, and corrective

action for releases. Some of the other mandates of this law include increased enforcement authority for the EPA, more stringent hazardous waste management standards, and a comprehensive underground storage tank program.⁴⁹

Government Code Section 65962.5

Section 65962.5 of the Government Code requires CalEPA to develop and update a list of hazardous waste and substances sites, known as the Cortese List. The Cortese List is used by state and local agencies and developers to comply with CEQA requirements. The Cortese List includes hazardous substance release sites identified by the Department of Toxic Substances Control (DTSC) and State Water Resources Control Board (SWRCB).⁵⁰

Toxic Substances Control Act

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

California Accidental Release Prevention Program

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

Asbestos-Containing Materials

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

⁴⁹ United States Environmental Protection Agency. "Summary of the Resource Conservation and Recovery Act." Accessed May 11, 2020. <https://www.epa.gov/laws-regulations/summary-resource-conservation-and-recovery-act>.

⁵⁰ California Environmental Protection Agency. "Cortese List Data Resources." Accessed May 28, 2020. <https://calepa.ca.gov/sitecleanup/corteselist/>.

CCR Title 8, Section 1532.1

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

Regional and Local

Municipal Regional Permit Provision C.12.f

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

With the adoption of the San Francisco Bay Region Municipal Regional Stormwater National Pollutant Discharge Elimination System (NPDES) Permit (MRP) by the San Francisco Bay Regional Water Quality Control Board on November 19, 2015, Provision C.12.f requires that permittees develop an assessment methodology for applicable structures planned for demolition to ensure PCBs do not enter municipal storm drain systems.⁵¹ Municipalities throughout the Bay Area are currently modifying demolition permit processes and implementing PCB screening protocols to comply with Provision C.12.f. Buildings constructed between 1950 and 1980 that are proposed for demolition must be screened for the presence of PCBs prior to the issuance of a demolition permit. Single family homes and wood-frame structures are exempt from these requirements.

San Mateo County Comprehensive Airport Land Use Plan

Daly City is within the jurisdiction of the San Francisco Airport (SFO) Land Use Plan component of the San Mateo County Comprehensive Airport Land Use Compatibility Plan (ALUCP), adopted in December 1996 and updated in 2001. Established in the CLUP are procedures used by the San Mateo City and County Association of Governments (C/CAG) to review land use decisions in the vicinity of San Mateo County airports. Airport planning boundaries define where height, noise and safety standards, policies, and criteria are applied to certain proposed land use policy actions.

Local

Daly City 2030 General Plan

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

⁵¹ California Regional Water Quality Control Board. *San Francisco Bay Region Municipal Regional Stormwater NPDES Permit*. November 2015.

Policy/Task	Description
Policy LU-18	Development activities shall not be allowed to significantly disrupt the natural or urban environment and all reasonable measures shall be taken to identify and prevent or mitigate potentially significant effects.
Task LU-18.1	Ensure that potentially significant environmental impacts associated with development proposals are properly mitigated through conditions of approval, mitigation measures, project design, or project denial. In cases where the impacts may not be completely preventable but will not significantly disrupt the community, the City may recognize that the benefits of a project may outweigh the environmental consequences. In no case shall the City approve a project that endangers the health, safety, or welfare of the public.
Policy SE-4.1	Support efforts to locate, regulate, and maintain information regarding hazardous materials located or transported within the City.
Policy SE-4.2	Cooperate with the County of San Mateo in the regulation of hazardous materials and transportation in the Fire Prevention Services Bureau within the City.
Policy SE-4.6	Require the preparation of a risk assessment to determine site suitability for applications for hazardous materials waste management facilities. Establish the distance requirements for these facilities from public assembly, residential or immobile population and recreation areas and structures. Assess impacts from seismic, geologic, and flood hazards, impacts on wetlands, endangered species, air quality and emergency response capabilities; and proximity to major transport routes.

3.9.1.2 *Existing Conditions*

Strata Environmental Services, Inc. conducted a review of aerial photographs, County Assessor's Office records, historical city directories, and agency records to obtain information about the historical uses of the project site. As part of the Phase I Environmental Assessment, records from federal, state, and local agencies were reviewed, and a site reconnaissance was completed to determine any potentially hazardous materials conditions affecting the project site. The historical uses and potential sources of contamination on the project site are discussed below.

Site History

Prior to 1966, the project site was pastureland. Between 1966 and 1969, the site was graded heavily and developed with a portion of the existing JUHSD campus, including the main campus, storage bungalows, and one 1,000-gallon and one 500-gallon underground storage tanks (USTs) that were used for storing waste products, including acid. The use of these USTs ceased in 1979 but remain on-site. Between 1969 and 2002, the site was developed with a General Education Department building (constructed in 1982), two one-story portables (constructed in 1998) and a Comcast relay station (constructed in 2002).

The JUHSD currently uses the site to provide administrative services and teach English and General/Adult Education classes. Other users of the site include Delucca's Tae Kwon Do, Headstart, Young World Preschool, Nemenzo Performing Arts, the Homenetmen Armenian General Athletic Union and Scouts, and religious groups including the Catholic Youth Organization (CYO). The CYO

dispatches, maintains, washes, and fuels a fleet of school buses at a maintenance garage located on-site, which uses a 2,000-gallon diesel fuel aboveground storage tank (AST), a 280-gallon motor oil AST, and a 280-gallon used oil AST. Additionally, Comcast operates an internet relay station that uses a 2,000-gallon diesel fuel AST.

On-Site Sources of Contamination

The project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (the “Cortese List”). As discussed above, two USTs remain on-site, however, the Phase I did not identify any records of reported spills or find any direct evidence of spills during a site visit. Nevertheless, contamination of the project site from the presence of these USTs cannot be definitely ruled out. Thus, these USTs would be considered a Recognized Environmental Concern (REC). No other environmental concerns, vapor encroachment conditions, RECs, Historic RECs (HRECs), or Controlled RECs (CRECs) were identified by Strata Environmental Services, Inc. in connection with the project site and past uses.⁵²

Lead-based paint was banned in 1978, ACMs were beginning to be phased out starting in 1973, and PCBs were banned in 1979. The existing buildings on-site were constructed in between 1966 and 1969; therefore, building materials could contain lead-based paint, ACMs, and PCBs.

Off-Site Sources of Contamination

A review of databases and files from federal, state, and local environmental regulatory agencies was used to determine the potential for the project site to be affected by releases from off-site sources of contamination within the appropriate ASTM search radius. Based on location, distance, regulatory status, and/or apparent groundwater gradient, the Phase I ESA determined these sites were not of environmental concern. Refer to Appendix I for more information regarding nearby off-site sources of contamination.

Airport Hazards

The project site is located within the SFO CLUP Airport Influence Area B, which requires projects to be consistent with the goals and policies of the CLUP. The project site is approximately five miles northwest from the runway termination point of the San Francisco International Airport, beyond the outer boundary of safety compatibility zones and outside of the Community Noise Equivalent Level (CNEL) noise contours for the airport, as delineated in the CLUP.

⁵² An REC is defined as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. An HREC is defined as a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls. A CREC is defined as a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority, with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls.

Wildland Fire Hazards

The project site is in a Local Responsibility Area (LRA) which has not been mapped by CAL FIRE as being within a Very High Fire Hazard Severity Zone (refer to Section 3.20 Wildfire).

3.9.2 Impact Discussion

For the purpose of determining the significance of the project's impact on hazards and hazardous materials, would the project:

- 1) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
- 2) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?
- 3) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?
- 4) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?
- 5) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard or excessive noise for people residing or working in the project area?
- 6) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
- 7) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

3.9.2.1 *Project Impacts*

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

Implementation of the project would result in the redevelopment of the project site with residential and commercial uses. Potentially hazardous materials, including vehicle fuels, oils, and fluids, would be used during construction. Residential and commercial uses do not involve the routine transport, use, or disposal of hazardous materials other than minor quantities required for emergency operations (e.g., diesel generators), cleaning, maintenance, or landscaping.

During construction, all hazardous materials would be transported, contained, stored, used, and disposed of in accordance with manufacturers' instructions and would be handled in compliance with all applicable federal, state, and county standards and regulations (refer to Section 3.9.1.1 Regulatory Framework). Construction-related hazardous materials use would be temporary, and does not constitute routine transport, use, or disposal.

Once operational, the project would be required by California Health and Safety Code 25507(a)(1)(A) to establish and implement a Hazardous Materials Business Plan if the amount of diesel fuel stored on-site for use of emergency generators exceeds 55 gallons. Cleaning supplies, maintenance chemicals, and herbicides and pesticides would be stored and managed in accordance with existing laws and regulations that ensure that the routine transport, storage, use, and disposal of these materials would not result in a significant hazard to the public or environment.

For the reasons stated above, the project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. **(Less Than Significant Impact)**

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

Under/Above-Ground Storage Tanks

As discussed under Section 3.9.1.2 Existing Conditions, there are two USTs and three ASTs present on-site that would need to be removed prior to demolition, including 1,000-gallon and 500-gallon waste USTs, one 2,000-gallon diesel fuel ASTs, a 280-gallon motor oil AST, and a 280-gallon used oil AST. The 2,000-gallon diesel fuel AST used by the Comcast Relay Station will remain on-site during and after construction. Prior to the demolition of the existing JUHSD campus, these tanks would be removed. The removal of these USTs and the soil surrounding them has the potential to release hazardous materials into the environment and poses a risk to construction workers, and adjacent residents, and school. The release of hazardous materials contained in the USTs and any contaminated soils into the environment constitutes a significant impact.

Mitigation Measure:

MM HAZ-2.1: Prior to the issuance of demolition, grading, or building permits for projects on Parcels C-E, the applicant shall remove the existing underground storage tanks (USTs) and aboveground storage tanks (ASTs) in accordance with the San Mateo County Department of Environmental Health's (SMCDEH) Underground Storage Tank Program and Aboveground Petroleum Storage Tank Program. During removal of the ASTs and USTs, contractors shall observe for staining and spilled contaminants. If stains and/or spills are observed, an Environmental Professional shall be retained to collect soil samples for laboratory analysis in accordance with commonly accepted environmental protocols. If contaminants are identified at concentrations exceeding applicable screening levels published by the RWQCB, DTSC and/or EPA⁵³, appropriate mitigation measures, such as, but not limited to, a Soil Management Plan and Health Safety Plan, shall be incorporated into the

⁵³ Note that naturally occurring background concentrations of metals, such as arsenic, amongst others, in soil may exceed their respective screening levels. Regulatory agencies generally do not require cleanup of soil to below background concentrations. Thus, concentrations of metals are compared to regional published background concentrations to establish if regulatory agency approval is warranted.

demolition permit. Approval by an appropriate regulatory agency (i.e., RWQCB, DTSC or SMCDEH) shall be obtained prior to conducting earthwork activities in the vicinity of the impacted soil. The applicant shall provide documentation of the safe removal of all existing USTs and ASTs consistent with SMCDEH requirements to Director of Economic and Community Development or Director's designee for review and approval.

With implementation of MM HAZ-2.1, impacts associated with the removal of existing USTs and ASTs would be less than significant.

Demolition

The project proposes to demolish the existing JUHSD campus, a portion of which was constructed prior to the phasing out of ACMs that occurred between 1973 and 1983 (refer to Section 3.9.1.1 Regulatory Framework). The JUHSD campus previously underwent asbestos abatement between 1989 and 1993, and again between 2000 and 2001. An Asbestos Hazard Emergency Response Act inspection was conducted in 2019 which found ACMs to be present throughout the site. Additionally, as a portion of the JUHSD campus was constructed prior to the prohibitions on the use of lead-based paint and PCBs, surfaces coated with lead-based paint and building materials containing PCBs may also be present.

Prior to demolition, NESHAP requires the removal of all regulated (i.e. friable) ACMs and certain non-friable ACMs which might be rendered friable before demolition activities that might disturb ACMs occurs.⁵⁴ Additionally, BAAQMD requires all materials that contain more than one percent of asbestos are required to be removed prior to demolition in accordance with BAAQMD standards. All demolition activities would be completed in accordance with the California Division of Occupational Safety and Health standards contained in Title 8, California Code of Regulations, Section 1529, to protect workers from asbestos exposure.

In order to protect construction workers, nearby sensitive receptors, and the environment, the California Division of Occupational Safety and Health requires a building survey that includes sampling and testing to be completed prior to demolition that identifies and quantifies building materials containing lead-based paint. All building materials containing lead-based paint are required to be removed prior to demolition in accordance with the California Division of Occupational Safety and Health Title 8, California Code of Regulations, Section 1532.1. Any debris or soil containing lead-based paint or coatings shall be disposed of at landfills that meet acceptance criteria for the type of lead being disposed.

The project proposes to demolish the on-site buildings, which may have materials that contain PCBs. During demolition, PCBs in building materials could be released and thereby exposed to stormwater runoff from the project site during rain events. To address this risk, applicants for a demolition permit must comply with the City's PCB Demolition Program with their permit application.⁵⁵ If on-site buildings do contain PCBs that exceed threshold limits, the project applicant must follow

⁵⁴ Friable materials are easily crumbled and may become airborne during demolition activities if not removed prior to demolition.

⁵⁵ City of Daly City. *Green Infrastructure Program*. Page 7. July 2019.

applicable federal and state laws, which may include reporting to such agencies as the EPA, RWQCB, and DTSC, who may require additional sampling and abatement of PCBs consistent with state and federal requirements.

Compliance with state and regional regulations would ensure that all materials containing hazardous quantities of asbestos, lead-based paint, and PCBs are identified and removed prior to demolition. As such, the proposed demolition of the existing JUHSD campus would not create a significant hazard through the release of ACMs, lead-based paint, or PCBs into the environment.

Construction

As discussed under Section 3.9.1.2 Existing Conditions, the project site was historically used as pastureland up until 1966, at which point it was heavily graded and developed and then used for a variety of educational and religious services, bus storage, maintenance, and fueling, and as a Comcast relay station. The Phase I ESA identified one REC, associated with the existing USTs on-site. As such, ground-disturbing activities associated with implementation of the project (e.g. excavation, grading, etc.) could disturb potentially contaminated soil that could become airborne and pose a health hazard to construction workers, nearby sensitive receptors, or the environment. With implementation of MM HAZ-2.1, however, the impact would be reduced to a less than significant level.

Operation

As discussed under Impact HAZ-1, the proposed residential and commercial uses would not routinely transport, use, or dispose of hazardous materials beyond small quantities of diesel fuel, cleaning supplies, maintenance chemicals, and herbicides and pesticides, all of which would be stored and managed in accordance with existing federal and state laws and regulations (refer to Section 3.9.1.1 Regulatory Framework). Accordingly, operation of the project would not create a significant hazard to the public or the environment due to the release of hazardous materials into the environment. **(Less than Significant Impact with Mitigation Incorporated)**

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

The project site is within a quarter mile of one existing school, the Summit Shasta Charter School, which is located at 905 Campus Drive adjacent to the plan area. The project's proposed residential and commercial uses would not emit hazardous emissions, and as discussed under Impact HAZ-1 and Impact HAZ-2, compliance with federal, state, and county regulations (refer to Section 3.9.1.1 Regulatory Framework) and implementation of MM HAZ-2.1 would ensure that hazardous materials used during construction and operation of the project's proposed residential and commercial uses would not create a significant hazard to the public or environment. **(Less Than Significant Impact with Mitigation Incorporated)**

Impact HAZ-4: The project would not be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment. **(No Impact)**

As discussed in Section 3.9.1.2 Existing Conditions, the project site is not on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. **(No Impact)**

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

The project site is located approximately five miles northwest of SFO within Airport Influence Area B. As noted in Section 3.9.1.2 Existing Conditions, the proposed project would be required to be consistent with the goals and policies of the SFO ALUCP. Additionally, projects that would occur within mapped noise and safety compatibility zones would be subject to additional restrictions and requirements. The project is outside of the mapped noise and safety compatibility zones where new land uses may conflict with noise generated by airport operations or aircraft accidents are likely to occur.

As noted in Section 3.9.1.1 Regulatory Framework, FAR Part 77 sets forth standards and review requirements for protecting the airspace for safe aircraft operation, particularly by restricting the height of potential structures and minimizing other potential hazards (such as reflective surfaces, flashing lights, and electronic interference) to aircraft in flight. These regulations require that the FAA be notified of certain proposed construction projects located within an extended zone defined by an imaginary slope radiating outward for several miles from an airport's runways, or which would otherwise stand at least 200 feet in height above ground. The project site is located on terrain that is 200 feet or greater above ground level. As such, the project is required to file FAA Form 7460-1, Notice of Proposed Construction or Alteration with the FAA at least 30 days prior to construction so that the project can be reviewed for aviation compatibility, or a signed exemption form pursuant to 14 CFR Part 77.9(b) be submitted prior to construction. On July 22, 2021, the Board of Directors of the San Mateo County Airport Land Use Commission determined that the proposed Precise Plan (including the Parcel B Development project) is consistent with the SFO ALUCP and FAR Part 77 regulations. **(Less Than Significant Impact)**

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

The proposed project would not impair or physically interfere with any adopted emergency response or evacuation plan. All project development would be constructed to comply with all applicable state and local building and fire codes. During construction and operation, roadways would not be blocked such that emergency vehicles would be unable to access the site or surrounding properties. Existing pedestrian walkways, bike paths, and handicap access pathways would be maintained. During

operation, emergency ingress and egress to the project site would be provided by the surrounding roadways. Therefore, the proposed project would not impair the implementation of or physically interfere with any emergency response or evacuation plan. **(Less Than Significant Impact)**

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

As discussed in Section 3.9.1.2 Existing Conditions, the project site is located in an urbanized area of Daly City and is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. Further, as described above under Impact HAZ-6, all project development would be constructed in accordance with current state and local building and fire codes to ensure structural stability and safety and the final site design would be reviewed by the Daly City Fire Department for consistency with applicable fire department standards. **(Less Than Significant Impact)**

3.9.2.2 Cumulative Impacts

Impact HAZ-C: The project would not result in a cumulatively considerable contribution to a cumulatively significant hazards and hazardous materials impact. **(Less than Significant Cumulative Impact)**

Projects in the cumulative scenario could be located on properties where hazardous materials may have been stored, used, and/or transported. These hazardous materials (such as gasoline, oil, propane, and various chemicals in manufacturing) may have been stored on these sites in aboveground or underground tanks. Storage tanks can leak, often resulting in soil and/or groundwater contamination. If groundwater is affected, it can impact properties downgradient of the spill. In addition, development of some of the sites would require demolition of existing buildings that may contain ACMs and/or lead paint. Demolition of these structures could expose construction workers or other persons in the vicinity to harmful levels of asbestos or lead.

Based on these conditions, which are present on most cumulative project sites to varying degrees, impacts could occur in the cumulative scenario as a result of exposure of residents and/or workers to substances that have been shown to adversely affect health. However, the impacts would be limited to individual sites, and not have the potential to contribute to cumulative impacts unless other projects were occurring in the immediate vicinity. For all cumulative scenario projects, mitigation measures will be implemented as a condition of approval to lessen risks associated with exposure to hazardous materials. Further, adherence to applicable existing local, state, and federal laws and regulations related to hazardous materials would lessen the potential for cumulative impacts.

If chemical releases have occurred in the cumulative scenario, and depending upon the extent of the release, contaminated soils could be excavated and transported to appropriate landfills or treated on-site. If groundwater is affected, remediation and ongoing groundwater sampling both on the site and on surrounding downgradient properties could be warranted. However, these conditions would be localized and limited to a given project site, and not have the potential to combine with other projects

unless they are adjacent. Finally, determining the extent of asbestos and lead paint contamination would also be required prior to building demolition and site grading and, if present, such substances would be handled and disposed of in a manner that minimizes human exposure. These impacts, too, would be limited to each project site or immediately surrounding sites under construction. Therefore, cumulative projects, including the proposed project, would not result in significant cumulative hazardous materials impacts. **(Less than Significant Cumulative Impact)**

3.10 HYDROLOGY AND WATER QUALITY

The following discussion is based, in part, on a Stormwater Memo prepared by BKF Engineers, dated May 2021, and a Water Supply Assessment prepared for the project by Brown and Caldwell, on behalf of the Daly City Department of Water and Wastewater Resources and dated December 2021. Copies of these reports are attached to this EIR as Appendix J and Appendix M, respectively.

3.10.1 Environmental Setting

3.10.1.1 *Regulatory Framework*

Federal and State

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

Statewide Construction General Permit

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

Regional

San Francisco Bay Basin Plan

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

Municipal Regional Permit Provision C.3

The San Francisco Bay RWQCB re-issued the Municipal Regional Stormwater NPDES Permit (MRP) in 2015 to regulate stormwater discharges from municipalities and local agencies (co-permittees) in Alameda, Contra Costa, San Mateo, and Santa Clara Counties, and the cities of Fairfield, Suisun City, and Vallejo.⁵⁶ Under Provision C.3 of the MRP, new and redevelopment projects that create or replace 10,000 square feet or more of impervious surface area are required to implement site design, source control, and Low Impact Development (LID)-based stormwater treatment controls to treat post-construction stormwater runoff. LID-based treatment controls are intended to maintain or restore the site's natural hydrologic functions, maximizing opportunities for infiltration and evapotranspiration, and using stormwater as a resource (e.g. rainwater harvesting for non-potable uses). The MRP also requires that stormwater treatment measures are properly installed, operated, and maintained.

In addition to water quality controls, the MRP requires new development and redevelopment projects that create or replace one acre or more of impervious surface to manage development-related increases in peak runoff flow, volume, and duration, where such hydromodification is likely to cause increased erosion, silt pollutant generation, or other impacts to local rivers, streams, and creeks. Projects may be deemed exempt from these requirements if they do not meet the minimized size threshold, drain into tidally influenced areas or directly into the Bay, or drain into hardened channels, or if they are infill projects in subwatersheds or catchment areas that are greater than or equal to 65 percent impervious.

Construction Dewatering Waste Discharge Requirements

Each of the RWQCBs regulate construction dewatering discharges to storm drains or surface waters within its Region under the NPDES program and Waste Discharge Requirements.

⁵⁶ MRP Number CAS612008

Local

Daly City 2030 General Plan

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

Policy/Task	Description
Policy RME-8	Through the development of a Stormwater Management Program, ensure that all new development complies with the applicable Municipal Regional Stormwater Permit by incorporating controls that reduce water quality impacts over the life of the project in ways that are both technically and economically feasible, and reduce pollutants in stormwater discharges to the maximum extent practicable.
Task RME-8.5	Ensure the regular inspection of stormwater treatment facilities as required by the Municipal Regional Stormwater NPDES Permit.
Policy RME-9	Balance stormwater mitigation measures with the other inherent benefits of higher density development that is in close proximity to public transit, i.e., reduction of Vehicle Miles Traveled (VMT) on local and regional roadways to the extent permitted under the Municipal Regional Stormwater Permit.
Task RME-9.1	Continue to explore low-impact development credits for high density transit-oriented development within the City's established Priority Development Areas with the Regional Water Quality Control Board.
Policy SE-2.1	Protect the City of Daly City from unreasonable risk to life and property caused by flood hazards by designing and constructing drainage facilities to improve the flow capacity of the City's water system in order to accommodate the storm water runoff generated by a 100-year storm.

Daly City Municipal Code

Chapter 13.20 – Well Standards

Chapter 13.30 includes standards intended to ensure that groundwater beneath the City will not be polluted or contaminated. The chapter contains requirements for construction, reconstruction, repair and destruction of water wells, cathodic protection wells, and monitoring wells. Permits are also required for these activities as well as for excavations that may intersect groundwater.

Title 14 – Storm Water Management and Discharge Control

Title 14, also known as the “City of Daly City Stormwater Management and Discharge Control Ordinance”, prohibits non-stormwater discharges to the City storm drain system. The purpose of the Ordinance is to eliminate non-stormwater discharges to the municipal separate storm drain system, control the discharge of spills, dumping or disposal of materials other than stormwater, and reduce pollutants in stormwater discharges into the storm drain system to the maximum extent practicable. Chapter 14.12 gives the City the authority to inspect projects to enforce any of the provisions of Title 14.

Chapter 15.62 – Grading, Erosion, and Sediment Control

Chapter 15.62, also known as the City of Daly City Grading, Erosion and Sediment Control Ordinance, sets forth rules and regulations to control site clearing, vegetation disturbances, land-fills, land excavations, soil storage, and other such activities which may cause sediments and other pollutants to enter the public drainage facilities. The chapter establishes the regulations, permit requirements, procedures for administration and enforcement of permits to properly control the aforementioned activities to preserve and enhance public health, safety and environment. Section 15.62.230 requires the permittee to maintain a copy of the permit, approved plans and reports and make these available for city inspection. Section 15.62.270 gives the City engineer authority to suspend or revoke a permit for violation or non-compliance with Chapter 15.62.

Chapter 17.41 – Water Conservation in Landscaping

Chapter 17.41 requires new construction projects with landscaping of 500 square feet or greater to complete a landscape project application and comply with the landscape and irrigation maintenance and stormwater management requirements outlined in this chapter.

3.10.1.2 *Existing Conditions*

Hydrology and Drainage

The project site is located within the Colma Creek Watershed, which drains to the San Francisco Bay Area via Colma Creek, the majority of which is either channelized or underground to allow for urban development.⁵⁷

The project site overall is southeast sloping, with the western portion of the site featuring a 100-foot high moderately sloped hillside cut that descends to the relatively flat existing Serramonte Del Rey campus, which extends east to a 65- to 50-foot high slope that descends to Callan Boulevard. Surface runoff on-site is collected in drains or inlets and conveyed via below grade pipes to the storm drain outfall, which is located in the existing parking lot near the main vehicular entrance at Serramonte Boulevard. The outfall discharges to an existing 24-inch storm drain main in Serramonte Boulevard that flows northeast before being discharged into Colma Creek, approximately 1.3 miles east of the project site.

The approximately 22-acre project site currently consists of 413,505 square feet (50 percent) of impervious surfaces and 415,450 square feet (50 percent) of pervious surfaces.

Surface Water Quality

The water quality of streams, creeks, ponds, and other surface water bodies can be greatly affected by pollution carried in contaminated surface runoff. Pollutants from unidentified sources, known as “non-point” source pollutants, are washed from streets, construction sites, parking lots, and other exposed surfaces into storm drains. Surface runoff from the Precise Plan area is collected by storm drains and discharged to Colma Creek. Runoff often contains contaminants such as oil and grease, plant and animal debris (e.g., leaves, dust, and animal feces), pesticides, litter, and heavy metals. In

⁵⁷ City of Daly City. *General Plan Update, Final Environmental Impact Report*. February 2013.

sufficient concentration, these pollutants have been found to adversely affect the aquatic habitats to which they drain. Colma Creek is currently listed on the 303(d) list for trash.^{58, 59}

Groundwater

The Colma Creek Watershed is located in the Westside Groundwater Basin, which has not been identified as a groundwater basin in a state of overdraft.⁶⁰

As discussed in Section 3.8.1.1 Existing Conditions, groundwater in the project vicinity is projected to flow generally south and east towards the San Francisco Bay at a depth of greater than 50 feet bgs.⁶¹ Fluctuations in groundwater levels occur due to many factors including seasonal fluctuation, underground drainage patterns, regional fluctuations, and other factors.

Flooding and Other Hazards

The project site is designated as Flood Zone X according to FEMA Flood Insurance Rate Maps. Areas within Flood Zone X have a 0.2 percent annual chance of flooding, with average depths of less than one foot or with drainage areas less than one square mile. No special flood hazard restrictions apply to Zone X.

Tsunami inundation maps prepared by the California Department of Conservation indicate that the project site is outside of tsunami hazard areas. Seiches can occur in semi- or fully-enclosed bodies of water and inundate adjacent areas; the nearest semi- or fully-enclosed water body is Lake Merced, located approximately 2.75 miles north of the Precise Plan area.

3.10.2 Impact Discussion

For the purpose of determining the significance of the project's impact on hydrology and water quality, would the project:

- 1) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?
- 2) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?
- 3) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
 - result in substantial erosion or siltation on- or off-site;

⁵⁸ The Clean Water Act (CWA), Section 303, establishes water quality standards and Total Maximum Daily Load (TMDL) programs. The 303(d) list is a list of impaired water bodies.

⁵⁹ California Environmental Protection Agency, State Water Resources Control Board. "Impaired Water Bodies". Accessed September 29, 2021.

https://www.waterboards.ca.gov/water_issues/programs/tmdl/integrated2014_2016.shtml

⁶⁰ California Department of Water Resources. "State Groundwater Management Act Basin Prioritization Dashboard". Accessed September 29, 2021. <https://gis.water.ca.gov/app/bp-dashboard/final/>

⁶¹ Strata Environmental Services, Inc. *Phase I Environmental Site Assessment, Serramonte del Rey Campus*. February 2020.

- substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;
 - create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or
 - impede or redirect flood flows?
- 4) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?
 - 5) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

3.10.2.1 *Project Impacts*

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

Construction Impacts

Implementation of the proposed project would temporarily impact surface water quality during construction. Future development would require demolition, grading, and paving of the project sites, activities that temporarily increase the amount of unconsolidated materials on the site. Construction of the below grade parking garages, new buildings, and other improvements (including utility connections) would require excavation. Grading and excavation activities could increase erosion and sedimentation, resulting in sediment, soil, and associated pollutants that could be carried by runoff into natural waterways and possibly increasing sedimentation impacts to local creeks or the San Francisco Bay.

All construction or demolition activity that results in land disturbances equal to or greater than one acre must obtain coverage under the Construction General Permit, which is administered by the SWRCB. The Parcel B Development project would disturb greater than one acre of land and, therefore, would require coverage under the Construction General Permit and submit a SWPPP and NOI to the SWRCB. Any future development on Parcels C-F disturbing more than one acre would similarly require coverage under the Construction General Permit. The City requires project applicants to submit a stormwater management plan that illustrates full compliance with the MRP. This will require the project to include stormwater controls such as site design measures, source controls, treatment measures, low impact development, hydromodification management, and construction best management practices. These policies are reinforced by the discharge prohibitions and requirements for reducing pollutants in storm water in Title 14 and Title 15 of the Municipal Code. Adherence to regulations, policies and standards will ensure that impacts to water quality will be less than significant.

Post-Construction Impacts

As discussed above, the 22-acre project site currently consists of 413,505 square feet (50 percent) of impervious surfaces and 415,450 square feet (50 percent) of pervious surfaces. Full buildout of the

proposed project would result in approximately 502,050 square feet (60 percent) of impervious surfaces and approximately 332,340 square feet (40 percent) of pervious surfaces, resulting in an overall increase of 88,545 square feet of impervious surfaces. To reduce water quality impacts post-construction, the project is required to comply with the MRP including Provision C.3 of the MRP regarding LID site design. LID features could include self-treating and self-retaining areas to allow on-site retention, percolation, and evaporation of stormwater runoff.

The project proposes to satisfy the MRP and Provision C.3 of the MRP with an approach that would allow Parcel B to ‘overcompensate’ by incorporating additional treatment beyond what would otherwise be required of that Parcel, and accrue treatment ‘credits’ that can be applied to other parcels (Parcels C-F) that would have more difficulty meeting the requirement solely within the boundaries of each parcel. The proposed retention structure within Parcel B would provide a 12,830 square-foot self-retaining stormwater treatment area that would collect water from the entire project site. This would ensure that stormwater discharge from the project site, at full buildout during a 10-year storm event, would match pre-construction conditions and not increase stormwater runoff from the project site. In addition, the project proposes for each phase of development during buildout, pre- and post-construction areas of impervious surfaces would be calculated within the phase limits to determine if there would be an increase in the peak runoff rate compared to existing conditions. If there is a calculated increase in peak runoff rate, a temporary stormwater detention system, such as a detention basin or below-grade detention pipe, would be located within the footprint of the undeveloped parcels until the phase can be connected to the Parcel B retention structure. At no point during the development process would the project increase the peak rate of stormwater runoff leaving the site.

Based on the above discussion, future development under the proposed Precise Plan, with compliance with existing regulations (including the NPDES and City’s Grading, Erosion and Sediment Control Ordinance), would not result in significant water quality impacts. **(Less Than Significant Impact with Mitigation Incorporated)**

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

Daly City receives a large portion of its water supply from the San Francisco Public Utilities Commission (SFPUC) and supplements the SFPUC supply with groundwater pumped from six local wells. During dry periods, groundwater makes up a larger proportion (up to 49 percent in fifth year consecutive dry year) of the City’s supply.⁶² The proposed project, consisting of 1,235 residential units and up to 14,000 square feet of neighborhood-serving retail/commercial uses, would not be expected to result in the need for excessive groundwater pumping from the local wells during normal years; however, during single and multiple dry-years, the City (with and without the project) is expected to experience shortfalls in water supply (see water supply discussion in Section 4.18

⁶² Brown and Caldwell. *Water Supply Assessment for the Jefferson Union High School District Master Plan Project*. December 2021. Page 4-3.

Utilities and Service Systems).⁶³ While shortfalls may occur, groundwater pumping within the Westside Groundwater Basin would not increase beyond the City's current allotment and water supplies would be procured from other sources.

There are no designated groundwater recharge areas within the Westside Groundwater Basin. The principal sources of recharge are direct infiltration of rainfall, infiltration of irrigation water, and leakage from water and sewer pipes.⁶⁴ As discussed in Impact HYD-1 above, the project would increase impervious surfaces on the site by 88,545 square feet, resulting in a corresponding decrease in infiltration capacity. The project, however, would include numerous self-retaining, self-treating, and bioretention areas within the landscaping, consistent with the MRP and Provision C.3, that would provide opportunities for stormwater infiltration. The project would therefore not be expected to substantially interfere with groundwater recharge or impede groundwater management of the basin. **(Less Than Significant Impact)**

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

There are no waterways present on the project site; therefore, future development of the Precise Plan would not alter the course of a stream or river. As discussed above under Impact HYD-1, implementation of proposed Precise Plan would result in an increase in impervious surfaces compared to existing conditions by 88,545 square feet. An increase in impervious surfaces would result in a corresponding increase in surface runoff from the project site. The project, however, would comply with applicable regulations, including the statewide Construction General Permit, MRP (including Provisions C.3), and City ordinances for controlling pollutants. In addition, the proposed storm drain system would retain stormwater on-site to match pre-project flow conditions under the 10-year storm event. Thus, the project would not result in substantial erosion, siltation, flooding, significant water quality impacts, or exceed the capacity of existing or planned stormwater drainage systems. **(Less than Significant Impact)**

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

The project site is not located in a 100-year floodplain and, therefore, would not place housing within a 100-year flood hazard area or impede or redirect flood flows within a 100-year flood hazard area.

⁶³ Ibid. Page 4-7.

⁶⁴ *San Francisco Bay Hydrologic Region Westside Groundwater Basin*, California's Groundwater Bulletin 118, January 20, 2006.

The project site, due to its topography, is not subject to seiche, tsunami, or mudslide hazards. **(No Impact)**

Impact HYD-5: The project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. **(Less than Significant Impact)**

As previously described, the project site is located within the Westside Groundwater Basin. There are existing groundwater management plans for the northwestern portion (North Westside Groundwater Basin Management Plan) and the southern portion (South Westside Basin Groundwater Management Plan) of the Basin. Although the project site technically lies outside of the boundaries of these two management plans, it is within the City of Daly City, which would be the water service provider for the project and is a participant in the South Westside Basin Groundwater Management Plan. The City would implement the groundwater protection and management goals and objectives of the Plan. The project, which proposes to redevelop the existing Serramonte Del Rey Campus into a multi-family housing development with ground-floor retail, would not conflict with or obstruct the implementation of the Plan in that the development of the site would not rely on groundwater beneath the site for water supply, nor would the project require dewatering. While the project would increase impervious surfaces by 88,545 square feet compared to existing conditions, it would not lead to a significant reduction in groundwater infiltration potential. **(Less Than Significant Impact)**

3.10.2.2 Cumulative Impacts

Impact HYD-C: The project would not result in a cumulatively considerable contribution to a cumulatively significant hydrology and water quality impact. **(Less than Significant Cumulative Impact)**

Water Quality, Groundwater, and Drainage Impacts

The geographic area for cumulative hydrology and water quality impacts includes the project site and the surrounding area, as well as other development within the Colma Creek watershed. Several of the cumulative projects identified in Table 3.0-1 would involve redevelopment of existing or previously developed sites that contain substantial impervious surfaces, and these projects would be required to conform to applicable General Plan goals, policies, and strategies regarding stormwater runoff, infrastructure, and flooding. All projects within the City, including those identified in Table 3.0-1, would also be required to comply with applicable requirements in the statewide Construction General Permit, MRP (including Provisions C.3), City ordinances, and NPDES permits standards to avoid hydrology and water quality impacts or reduce them to a less than significant level. For these reasons, the project would not have a cumulatively considerable water quality, groundwater, or drainage impact.

Flooding and Inundation Impacts

As discussed under Impact HYD-4, the project site is not subject to significant flood or inundation hazards; therefore, the project would not result in a considerable contribution to significant

cumulative impact related to release of pollutants due to flooding and inundation. (**Less than Significant Cumulative Impact**)

3.11 LAND USE AND PLANNING

3.11.1 Environmental Setting

3.11.1.1 *Regulatory Framework*

Local

Daly City 2030 General Plan

The General Plan includes policies for the purpose of avoiding or mitigating impacts resulting from development projects within the City. All future development allowed by the project would be subject to conformance with applicable General Plan policies, including those listed below.

Policy/Task	Description
Policy LU-4	Provide regulatory incentives for developers to construct higher-density mixed use development along Mission Street, Geneva Avenue, and any other locations within close proximity to public transit.
Policy LU-8	Ensure that landscape and hardscape improvements made to all residential properties are environmentally sound and do not negatively impact existing neighborhood aesthetics.

Daly City Municipal Code

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

3.11.1.2 *Existing Conditions*

General Plan Land Use Designation

The majority of the project site has a General Plan land use designation of C-O (Commercial – Office) while a smaller portion of the site in the northwest corner (Parcel A Development project) has a General Plan land use designation of R-HD (Residential-High Density). The C-O designation allows for office and locally serving commercial uses such as health and fitness centers, small scale printing and photocopying businesses, and eating and drinking establishments. The floor-to-area ratio (FAR) allowed for the C-O designation ranges from 1.0 to 3.5. The R-HD designation allows for multi-family residential buildings between 35.1 and 50 dwelling units per acre.

Zoning Ordinance

Similar to the General Plan Designation, the majority of the project site is zoned PD-31 (Planned Development District) while a smaller portion of the site in the northwest corner (Parcel A Development project) is zoned to PD-31A. The PD-31 zoning is the current 1985 Precise Plan for the project site, which allows for the development of up to 175 residential units and approximately 700,000 square feet of office space. The PD-31A zoning was specifically created to allow for the

construction of the Parcel A Development project, which has been developed with 122 multifamily units intended for Jefferson Union High School District (JUHSD) employees.

Existing Land Uses

The northwest corner of the project site has been developed with the approved Parcel A Development project (JUHSD Faculty and Staff Housing project). The northeast corner of the project site (Parcel B) is currently developed with a surface parking lot and portable building units. The southwest corner of the project site is developed with the JUHSD demonstration garden. The remainder of the project site is developed with surface parking lots and a one- to two-story concrete building that serves as the existing JUHSD district office and adult education buildings.

Surrounding Land Uses

The project site is surrounded by residential development to the north, northeast, south, and west. The residences to the north and northeast are two- to three-story apartment buildings made of stucco and wood construction. The residences to the south (Serramonte Ridge Apartment Homes) are three- to four-story apartment buildings also made of stucco and wood construction. The residences to the west are two-story, single-family homes made of wood construction.

Southeast of the project site is the Summit Shasta High School, which is developed with one- to two-story concrete education buildings. East of the project site across Callan Boulevard is a Chinese cemetery consisting of mostly open space and gravestones.

3.11.2 Impact Discussion

For the purpose of determining the significance of the project's impact on land use and planning, would the project:

- 1) Physically divide an established community?
- 2) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

3.11.2.1 *Project Impacts*

Impact LU-1:	The project would not physically divide an established community. (Less than Significant Impact)
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The project site is located in a developed urban area with residential uses to the north and west, and a variety of institutional uses to the south and east. Implementation of the proposed project would result in the construction of 1,235 residential units (Parcel A has already been constructed) and up to 14,000 square feet of neighborhood-serving retail/commercial uses on the site. The layout and design of the project does not include any features that would physically divide the community (e.g., impeding roadways or sidewalks). In addition, implementation of the project would include right-of-way and pedestrian and bicycle improvements that would promote mobility in the project area. For

these reasons, the project would not physically divide an established community. **(Less Than Significant Impact)**

Impact LU-2: The project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. **(Less than Significant Impact)**

The project site is located in the Serramonte Planning Area, which is the newest large-scale subdivision in Daly City. The project site is designated in the General Plan as C-O which allows for office and locally-serving commercial uses. In order for the proposed Precise Plan to comply with the General Plan, a General Plan Amendment is proposed to C-MU (Commercial – Mixed Use), which allows vertical mix of commercial and residential uses (e.g., retail or restaurant uses at the street level and residential uses at levels above the street). The FAR of C-MU designated areas generally ranges from 1.0 to 6.0.

The proposed project would comply with the City’s Inclusionary Housing Ordinance (Chapter 17.47 of the City’s Municipal Code), which requires 10 percent of rental units to be low-income units. According to the Ordinance, a lack of new affordable units will have a substantial negative impact on the environment because: (1) housing will have to be built elsewhere, far from employment centers and therefore commutes will increase, causing increased traffic and transit demand and consequent noise and air pollution; and (2) City businesses will find it more difficult to attract and retain the workers they need. Affordable housing policies contribute to a healthy job and housing balance by providing more affordable housing close to employment centers.

The proposed project would construct housing within the City of Daly City and it aligns with the City’s Inclusionary Housing Ordinance in providing at least 10 percent affordable housing. In addition, the proposed project is subject to mitigation measures to minimize environmental impacts as discussed throughout this EIR, and would be consistent with General Plan policies adopted to avoid or mitigate environmental effects as described in the individual resource sections of this EIR. For these reasons, the proposed project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. **(Less than Significant Impact)**

3.11.2.2 Cumulative Impacts

Impact LU-C: The project would not result in a cumulatively considerable contribution to a cumulatively significant land use and planning impact. **(Less than Significant Cumulative Impact)**

Cumulative scenario projects in the City are subject to General Plan goals, policies, and action statements that require appropriate buffers, edges, and transition areas between land uses. In addition, setback, design, and operational requirements of the City’s Zoning Ordinance minimize land use compatibility issues that might result in physical land divisions. For these reasons, a cumulative

impact related to dividing an established community would not occur, consistent with the conclusions in the General Plan EIR.

Cumulative scenario projects in the City of Daly City would go through the City development review process. Projects would be analyzed for conformance with applicable policies adopted for the purpose of avoiding or mitigating an environmental impact through the CEQA review process. The project, therefore, in combination with cumulative development, would not result in significant policy conflict impacts and would not contribute to a significant cumulative land use impact as a result of conflict with policies to avoid a significant environmental impact. **(Less than Significant Cumulative Impact)**

3.12 MINERAL RESOURCES

3.12.1 Environmental Setting

3.12.1.1 *Regulatory Framework*

State

Surface Mining and Reclamation Act

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

3.12.1.2 *Existing Conditions*

According to the Mineral Lands Classification Map of the SMGB, the City of Daly City does not include any mineral extraction areas of statewide importance.⁶⁵

3.12.2 Impact Discussion

For the purpose of determining the significance of the project's impact on mineral resources, would the project:

- 1) Result in the loss of availability of a known mineral resource that would be of value to the region and residents of the state?
- 2) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

3.12.2.1 *Project Impacts*

Impact MIN-1:	The project would not result in the loss of availability of a known mineral resource that would be of value to the region and residents of the state. (No Impact)
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The project site is currently developed with JUHSD district office buildings, surface parking, a demonstration garden, and the recently constructed Parcel A JUHSD Staff and Faculty Housing project. As discussed under Section 4.12.1.2 Existing Conditions, the project site does not contain any known mineral resources. Therefore, the project would have no impact on the availability of known, valuable mineral resources. **(No Impact)**

⁶⁵ California Department of Conservation. *Designated Areas Update San Francisco South Quadrangle*. Map. 1996.

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

See response to Impact MIN-1 above. **(No Impact)**

3.12.2.2 *Cumulative Impacts*

Impact MIN-C: The project would not result in a cumulatively considerable contribution to a cumulatively significant mineral resources impact. **(No Cumulative Impact)**

Since the project would not result in impacts to mineral resources, the project would not contribute to a cumulative impact to mineral resources. **(No Cumulative Impact)**

3.13 NOISE

The following discussion is based, in part, on a noise and vibration assessment prepared for the project by Illingworth & Rodkin, Inc. A copy of this report, dated June 2022, is attached to this EIR as Appendix K.

3.13.1 Environmental Setting

Noise

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

Since excessive noise levels can adversely affect human activities and human health, federal, state, and local governmental agencies have set forth criteria or planning goals to minimize or avoid these effects. Noise guidelines are generally expressed using one of several noise averaging methods, including L_{eq} , DNL, or CNEL.⁶⁶ These descriptors are used to measure a location's overall noise exposure, given that there are times when noise levels are higher (e.g., when a jet is taking off from an airport or when a leaf blower is operating) and times when noise levels are lower (e.g., during lulls in traffic flows on freeways or in the middle of the night). L_{max} is the maximum A-weighted noise level during a measurement period.

Vibration

Ground vibration consists of rapidly fluctuating motions or waves with an average motion of zero. Vibration amplitude can be quantified using Peak Particle Velocity (PPV), which is defined as the maximum instantaneous positive or negative peak of the vibration wave. PPV has been routinely used to measure and assess ground-borne construction vibration. Studies have shown that the threshold of perception for average persons is in the range of 0.008 to 0.012 inches/second (in/sec) PPV.

3.13.1.1 *Regulatory Framework*

Federal

Federal Transit Administration Vibration Limits

The Federal Transit Administration (FTA) has developed vibration impact assessment criteria for evaluating vibration impacts associated with transit projects. The FTA has proposed vibration impact

⁶⁶ L_{eq} is a measurement of average energy level intensity of noise over a given period of time. Day-Night Level (DNL) is a 24-hour average of noise levels, with a 10 dB penalty applied to noise occurring between 10:00 PM and 7:00 AM. Community Noise Equivalent Level (CNEL) includes an additional five dB applied to noise occurring between 7:00 PM and 10:00 PM. Where traffic noise predominates, the CNEL and DNL are typically within two dBA of the peak-hour L_{eq} .

criteria based on maximum overall levels for a single event. The impact criteria for groundborne vibration are shown in Table 3.13-1 below. These criteria can be applied to development projects in jurisdictions that lack vibration impact standards.

Table 3.13-1: Groundborne Vibration Impact Criteria			
Land Use Category	Groundborne Vibration Impact Levels (VdB inch/sec)		
	Frequent Event	Occasional Events	Infrequent Events
Category 1: Buildings where vibration would interfere with interior operations	65	65	65
Category 2: Residences and buildings where people normally sleep	72	75	80
Category 3: Institutional land uses with primarily daytime use	75	78	83
Source: Federal Transit Administration. <i>Transit Noise and Vibration Assessment Manual</i> . September 2018.			

State

California Building Standards Code

The CBC establishes uniform minimum noise insulation performance standards to protect persons within new buildings housing people, including hotels, motels, dormitories, apartments, and dwellings other than single-family residences. Title 24 mandates that interior noise levels attributable to exterior sources not exceed 45 L_{dn}/CNEL in any habitable room. Exterior windows must have a minimum Sound Transmission Class (STC) of 40 or Outdoor-Indoor Transmission Class (OITC) of 30 when the property falls within the 65 dBA DNL noise contour for a freeway or expressway, railroad, or industrial source.

California Green Building Standards Code

For commercial uses, CALGreen (Section 5.507.4.1 and 5.507.4.2) requires that wall and roof-ceiling assemblies exposed to the adjacent roadways have a composite STC rating of at least 50 or a composite OITC rating of no less than 40, with exterior windows of a minimum STC of 40 or OITC of 30 when the commercial property falls within the 65 dBA L_{dn} or greater noise contour for a freeway or expressway, railroad, or industrial or stationary noise source. The state requires interior noise levels to be maintained at 50 dBA L_{eq}(1-hr) or less during hours of operation at a proposed commercial use.

Local

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

As discussed in more detail in Section 4.10 Land Use, the project site is located within the Airport

Influence Area (AIA) of the San Francisco International Airport (SFO). Properties within the AIA may be subject to some of the annoyances or inconveniences associated with proximity to airport operations (e.g., noise, vibration, and odors). The airport/land use compatibility of a proposed development or land use policy action shall be determined by comparing the proposed development or land use policy action with the safety compatibility criteria, noise compatibility criteria, and airspace protection/height limitation criteria in the ALUCP. The site is located outside of the SFO 65 dB CNEL noise contour.

Daly City 2030 General Plan

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

Policy/Task	Description
Policy NE-1	Use the future noise contour map to identify existing and potential noise impact areas.
Task NE-2.1	Use the Noise Control Guidelines to assess the suitability of a site for new development in combination with the noise contours to accurately identify areas that may need additional noise study and mitigation. Noise mitigations include additional insulation, double glazing of windows and increasing building setbacks from the noise source. Mitigations should also be creative and attractive whenever possible and appropriate. Creative noise mitigation measures can include incorporation of fountains using water to mask freeway noise and noise walls of an appropriate scale painted with decorative murals.
Policy NE-3	Maintain a CNEL level of not more than 70 dBA L_{eq} in residential areas
Task NE-3.1	Continue to enforce the environmental noise requirements of the State Building Code (Title 24).
Policy NE-4	Maintain a noise level not in excess of 75 dBA CNEL in open space, parks, and tot lots, including outdoor activity areas such as outdoor entertainment or green space of multi-family projects.
Policy NE-5	Maintain the City's current standard of 75 dBA CNEL for office, commercial, and professional areas.
Task NE-5.1	Additional noise studies should be conducted in "Conditionally Acceptable" noise environments to ensure adequate mitigation features are employed. Usually conventional construction with closed windows and fresh air supply systems will maintain a healthy noise environment.
Policy NE-6	Require new development to perform additional acoustical studies in noise environments that are identified as 'Conditionally Acceptable' or 'Normally Unacceptable' to the Guidelines.
Policy NE-9	Work to ensure that the expansion of or changes to existing land uses do not create additional noise impacts for sensitive receptors in the vicinity of the project from intensification or alteration of existing land uses by requiring applicants.
Task NE-9.1	Depending upon the hours of operation, intensity of use, and the location of sensitive receptors in the area, the expansion or change of use could cause noise impacts.

Policy/Task	Description
	Acoustical studies should be performed, at the applicant's expense, during the discretionary and environmental review processes and conditions should be placed on the project accordingly.
Task HE-4.2	For all development proposals with the 65dB CNEL noise contour, the City shall require a noise study that identifies the proposed project's compliance with requirement of Task 4.1. If the project qualifies for review under the California Environmental Quality Act (CEQA), the City shall incorporate the noise study and any mitigation measures into the CEQA document and shall adopt findings that the project, as conditioned, complies with the interior noise level requirement.
Task NE-11.3	Require all future development within the Airport Influence Area B boundary for San Francisco International Airport to conform to the relevant height/airspace protection, aircraft noise, and safety policies and land use compatibility criteria contained within the most recent adopted version of the comprehensive airport/land use compatibility plan (ALUCP) for the environs of San Francisco International Airport.

Daly City Municipal Code

Title 9 – Public Peace, Morals and Welfare

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

Title 15 – Buildings and Construction

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

Title 17 – Zoning

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

3.13.1.2 Existing Conditions

The project site is bounded by Serramonte Boulevard and residences to the north, a variety of institutional, quasi-public, and commercial uses to the east and south, and residences to the south and west. The primary noise source in the project area is traffic from the surrounding highways and roadways and aircraft departures from SFO.

A noise monitoring survey was conducted between December 7, 2021 and December 9, 2021 to document existing noise conditions within and around the project site. The noise monitoring survey included three long-term noise measurements (LT-1 through LT-3) and four short-term noise measurements (ST-1 through ST-4). Noise measurement locations are shown in Figure 3.13-1.

Long-term noise measurement LT-1 was made south of the proposed project, in the developed portion of the 1985 Precise Plan adjacent to the Serramonte Ridge Apartment Homes complex, about 66 feet west of the Campus Drive centerline and about 400 feet northwest of the Hickey Boulevard centerline. Hourly average noise levels typically ranged from 59 to 65 dBA L_{eq} during daytime hours and from 49 to 61 dBA L_{eq} at night.

Long-term noise measurement LT-2 was conducted just south of the proposed project near the eastern edge of the developed portion of the 1985 Precise Plan and adjacent to the Young World Preschool & Childcare parking lot, about 132 feet west of the Callan Boulevard centerline. Hourly average noise levels at this location typically ranged from 59 to 65 dBA L_{eq} during the day and from 46 to 62 dBA L_{eq} at night.

Long term noise measurement LT-3 was conducted at the northern portion of the proposed project in Parcel B, about 85 feet south of the Serramonte Boulevard centerline. Hourly average noise levels at this location typically ranged from 62 to 67 dBA L_{eq} during the day and from 47 to 65 dBA L_{eq} at night.

The results of the four short-term noise measurements and their locations are summarized in Table 3.13-2 below.

Table 3.13-2: Summary of Short-Term Measurements (dBA)						
Noise Measurement Location	L_{max}	$L_{(1)}$	$L_{(10)}$	$L_{(50)}$	$L_{(90)}$	$L_{eq(10)}$
ST-1: ~250 feet from Callan Boulevard Centerline, 230 feet from the Serramonte Boulevard Centerline	65	62	59	55	53	56
ST-2: ~40 feet from Serramonte Boulevard Centerline	79	70	65	60	56	63
ST-3: ~80 feet from St. Francis Boulevard Centerline	63	59	56	54	52	55
ST-4: ~100 feet from the Campus Drive Centerline	75	74	62	52	47	61



NOISE MONITORING LOCATIONS

FIGURE 3.13-1

3.13.2 Impact Discussion

For the purpose of determining the significance of the project's impact on noise, would the project result in:

- 1) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
- 2) Generation of excessive groundborne vibration or groundborne noise levels?
- 3) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

For the purposes of this analysis, the City of Daly City relies on the following CEQA thresholds of significance as related to noise:

- A significant noise impact would be identified if the project would generate a substantial temporary or permanent noise level increase over ambient noise levels at existing noise-sensitive receptors surrounding the project site and that would exceed applicable noise standards presented in the General Plan or Municipal Code at existing noise-sensitive receptors surrounding the project site.
 - A potentially significant impact would occur if the project generated noise levels would result in a substantial temporary or periodic increase in ambient noise levels above current levels.
 - A temporary construction noise impact would be considered significant if project construction activities produced noise levels exceeding 90 dBA L_{eq} at residential land uses or 100 dBA L_{eq} at commercial land uses surrounding the site.⁶⁷
 - A significant permanent noise level increase would occur if project-generated traffic generated by the project or project improvements/operations would substantially increase noise levels at sensitive receivers in the vicinity. A substantial increase would occur if: a) the noise level increase is five dBA CNEL or greater, with a future noise level of less than the “normally acceptable” standard, or b) the noise level increase is three dBA CNEL or greater, with a future noise level equal to or greater than the “normally acceptable” standard.
 - A significant noise impact would be identified if the project would expose persons to or generate noise levels that would exceed applicable noise standards presented in the General Plan or Municipal Code.
- A significant impact would be identified if the construction of the project would generate excessive vibration levels surrounding receptors. Ground-borne vibration levels exceeding 0.3 in/sec PPV would have the potential to result in cosmetic damage to normal buildings.

⁶⁷ Federal Transit Administration. *Transit Noise and Vibration Impact Assessment Manual*. 2018.

- A significant noise impact would be identified if the project would expose people residing or working in the project area to excessive aircraft noise levels.

3.13.2.1 *Project Impacts*

Impact NOI-1: The project would not result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. **(Less than Significant Impact with Mitigation Incorporated)**

Construction Noise

Construction of the proposed project would include demolition of existing structures, excavation and grading, and construction of new buildings. The majority of construction noise would be generated by the operation of equipment and heavy machinery, such as bull dozers, backhoes, and auger drills. This type of construction equipment could generate noise ranging from 70 to 90 dBA at a distance of 50 feet away. The project would be built out over several phases, with the Parcel B Development project being constructed first and taking approximately 24 months to complete. The remaining development on Parcels C-F are assumed to be built in two phases (Parcels C and D, followed by Parcels E and F).

Noise modeling for buildout of the Precise Plan (refer to Appendix K) assumed worst-case conditions, in that all equipment per phase of construction would be operating simultaneously. As discussed in Section 3.3 Air Quality, construction equipment assumed in the noise modeling was based on CalEEMod default equipment and schedule information for a project of this type and size per phase. For construction noise, the use of multiple pieces of equipment simultaneously would add together as a collective noise source. While every piece of equipment per phase would likely be scattered throughout the site, the noise-sensitive receptors surrounding the site would be subject to the collective noise source generated by all equipment operating at once. Therefore, to assess construction noise impacts at the receiving property lines of noise-sensitive receptors, the worst-case hourly average noise level for each phase was centered on the site and extrapolated to the nearest property line of the surrounding land uses.

The nearest noise sensitive receptors are residential buildings the north, west, and south, as well as a school to the south of the project site. Ambient noise levels in the project area range from 46 to 67 dBA L_{eq} . Since the proposed project would be built out over phases, construction noise and location would vary by phase. Table 3.13-3 through Table 3.13-5 summarizes the equipment expected to be used for each construction phase (Parcels B-F), duration of construction, and estimated noise levels from the center of each phase to the property lines of the surrounding land uses. As each Parcel is proposed for development, the assumptions used for purposes of this analysis would be revisited to confirm they are accurate in evaluating and disclosing the impacts of constructing that phase, and to the extent the specific construction details differ from what was evaluated in this EIR, additional analysis would be completed to fully evaluate the proposed development to identify any additional noise controls that would be necessary, if at all, for the construction activity to avoid impacting

nearby sensitive uses, including earlier phases of the Precise Plan that were at that point occupied and could be impacted by construction activity elsewhere under the Precise Plan.

Table 3.13-3: Parcel B Construction Phase Noise Levels						
Phase	Time Duration	Construction Equipment (Quantity)	Calculated Hourly Average L_{eq} at Residence, dBA			
			South Parcel C/D (215 ft)	North Multi-Family Residential (220 ft)	West Parcel A (250 ft)	East Cemetery (505 ft)
Demolition	7/3/2021-7/28/2023	Concrete/Industrial Saw (1) Excavator (3) Rubber-Tired Dozer (2)	80	79	78	72
Site Preparation	7/29/2023-8/11/2023	Rubber-Tired Dozer (3) Tractor/Loader/Backhoe (4)	74	74	73	66
Grading/ Excavation	8/12-2023-9/8/2023	Excavator (1) Grader (1) Rubber Tired Dozer (1) Tractor/Loader/Backhoe (3)	70	70	69	63
Trenching/ Foundation	9/9/2023-10/6/2023	Tractor/Loader/Backhoe (1) Excavator (1)	74	73	72	66
Building - Exterior	10/7/2023-8/23/2024	Crane (1) Forklift (3) Generator set (1) Tractor/Loader/Backhoe (1) Welder (1)	77	77	76	70
Building-Interior/ Architectural coating	8/24/2024-9/20/2024	Air Compressor (3)	58 to 77 ^a	58 to 77 ^a	56 to 76 ^a	50 to 70 ^a
Paving	9/21/2024-10/18/2024	Paver (2) Paving Equipment (2) Roller (2)	71 ^b	71 ^b	69 to 70 ^b	63 to 64 ^b
a. The range of construction noise levels represents the levels during the Building-Interior/Architectural Coating phase only and combined with the Building-Exterior phase. b. The range of construction noise levels represents the levels during the Paving phase only and combined with the Building-Interior/Architectural Coating and Building-Exterior phases.						

Table 3.13-4: Parcel C/D Construction Phase Noise Levels

Phase	Time Duration	Construction Equipment (Quantity)	Calculated Hourly Average L_{eq} at Residence, dBA			
			East Parcel E (195 ft)	North Parcel B (280 ft)	South School (290 ft)	East Cemetery (500 ft)
Demolition	25 Days	Concrete/Industrial Saw (1) Excavator (3) Rubber-Tired Dozer (2)	80	77	77	72
Site Preparation	13 Days	Rubber-Tired Dozer (3) Tractor/Loader/Backhoe (4)	75	72	71	67
Grading/ Excavation	41 Days	Excavator (1) Grader (1) Rubber Tired Dozer (1) Tractor/Loader/Backhoe (3)	80	77	77	72
Trenching/ Foundation	42 Days	Tractor/Loader/Backhoe (1) Excavator (1)	67	64	64	59
Building - Exterior	61 Days	Crane (1) Forklift (3) Generator set (1) Tractor/Loader/Backhoe (1) Welder (1)	78	75	75	70
Building-Interior/ Architectural coating	34 Days	Air Compressor (3)	59 to 78 ^a	55 to 75 ^a	55 to 75 ^a	50 to 70 ^a
Paving	42 Days	Paver (2) Paving Equipment (2) Roller (2)	72 ^b	68 to 69 ^b	68 ^b	63 to 64 ^b
a. The range of construction noise levels represents the levels during the Building-Interior/Architectural Coating phase only and combined with the Building-Exterior phase. b. The range of construction noise levels represents the levels during the Paving phase only and combined with the Building-Interior/Architectural Coating and Building-Exterior phases.						

Table 3.13-5: Parcel E/F Construction Phase Noise Levels						
Phase	Time Duration	Construction Equipment (Quantity)	Calculated Hourly Average L_{eq} at Residence, dBA			
			North Parcel A (240 ft)	South Multi-Family Residential (280 ft)	East Parcel C/D (250 ft)	West Single Family (465 ft)
Demolition	25 Days	Concrete/Industrial Saw (1) Excavator (3) Rubber-Tired Dozer (2)	75	73	69	69
Site Preparation	13 Days	Rubber-Tired Dozer (3) Tractor/Loader/Backhoe (4)	73	72	68	67
Grading/ Excavation	41 Days	Excavator (1) Grader (1) Rubber Tired Dozer (1) Tractor/Loader/Backhoe (3)	71	70	66	65
Trenching/ Foundation	42 Days	Tractor/Loader/Backhoe (1) Excavator (1)	65	64	60	59
Building - Exterior	61 Days	Crane (1) Forklift (3) Generator set (1) Tractor/Loader/Backhoe (1) Welder (1)	76	75	71	71
Building-Interior/ Architectural coating	34 Days	Air Compressor (3)	57 to 76 ^a	55 to 75 ^a	51 to 71 ^a	51 to 71 ^a
Paving	42 Days	Paver (2) Paving Equipment (2) Roller (2)	70 ^b	68 to 69 ^b	64 to 65 ^b	64 ^b
a. The range of construction noise levels represents the levels during the Building-Interior/Architectural Coating phase only and combined with the Building-Exterior phase. b. The range of construction noise levels represents the levels during the Paving phase only and combined with the Building-Interior/Architectural Coating and Building-Exterior phases.						

As shown in Table 3.13-3 through Table 3.13-5 above, construction of the proposed project during each phase (none overlapping) could generate noise levels that exceed ambient noise levels by five dBA L_{eq} during construction; however, construction noise levels would not exceed 90 dBA L_{eq} at residential land uses or 100 dBA L_{eq} at commercial land uses surrounding the project site. The project would be required to implement Best Management Practices (BMPs). BMPs are required at the time of building permit issuance for all development and would reduce any impacts of additional noise level exposure to insignificance. Such BMPs include requirements for construction vehicles and equipment to be properly muffled. Construction hours would be limited to 8:00 AM to 5:00 PM, Mondays through Fridays. Construction on weekends and holidays will be prohibited to avoid inconveniencing neighbors. To ensure construction noise impacts do not exceed acceptable levels, the following mitigation measure would be implemented for each phase of development, i.e. each Parcel.

Mitigation Measure:

MM NOI-1.1: The applicant shall develop a construction noise control plan for each construction phase, including, but not limited to, the following available controls:

- Construct temporary noise barriers, where feasible, to screen stationary noise-generating equipment. Temporary noise barrier fences would provide a 5 dBA noise reduction if the noise barrier interrupts the line-of-sight between the noise source and receptor and if the barrier is constructed in a manner that eliminates any cracks or gaps.
- Equip all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment.
- Unnecessary idling of internal combustion engines should be strictly prohibited.
- Locate stationary noise-generating equipment, such as air compressors or portable power generators, as far as possible from sensitive receptors as feasible. If they must be located near receptors, adequate muffling (with enclosures where feasible and appropriate) shall be used to reduce noise levels at the adjacent sensitive receptors. Any enclosure openings or venting shall face away from sensitive receptors.
- Utilize "quiet" air compressors and other stationary noise sources where technology exists.
- Construction staging areas shall be established at locations that will create the greatest distance between the construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction.
- Locate material stockpiles, as well as maintenance/equipment staging and parking areas, as far as feasible from residential receptors.
- Route construction-related traffic along major roadways and as far as feasible from sensitive receptors.

- Locate material stockpiles, as well as maintenance/equipment staging and parking areas, as far as feasible from residential receptors.
- Control noise from construction workers' radios to a point where they are not audible at existing residences bordering the project site.
- The contractor shall prepare a detailed construction schedule for major noise-generating construction activities. The construction plan shall identify a procedure for coordination with adjacent residential land uses so that construction activities can be scheduled to minimize noise disturbance.
- Designate a "disturbance coordinator" who would be responsible for responding to any complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., bad muffler, etc.) and will require that reasonable measures be implemented to correct the problem. Conspicuously post a telephone number for the disturbance coordinator at the construction site and include in it the notice sent to neighbors regarding the construction schedule.

With implementation of MM NIO-1.1 above, the proposed project would reduce construction noise to a less than significant level.

Operational Noise

Traffic Noise

The ambient noise environment near the school areas as measured by LT-2 resulted in a noise level of 63 dBA CNEL. The existing ambient noise environment measured at LT-1 and LT-3 near multi-family residential areas resulted in noise levels ranging from 65-66 dBA CNEL. A significant impact would occur if project-generated traffic increased levels by three dBA CNEL or more. For reference, a three dBA CNEL noise increase would be expected if the project would double existing traffic volumes along a roadway.

As discussed further in Section 3.15 Transportation, implementation of the proposed project would result in an increase in traffic along surrounding streets. Based on these traffic changes, the project is estimated to result in a maximum noise level increase of two dBA CNEL along all roadways in the project area; therefore, project traffic noise would be below the three dBA CNEL impact threshold. As a result, the traffic noise generated by the proposed project would have a less than significant impact.

Mechanical Equipment

The project would include various mechanical equipment such as air conditioners, exhaust fans, chillers, pumps, and air handling equipment located on the roofs of the proposed buildings.

Mechanical equipment on the roofs of future buildings on Parcels B, C, D, E, and F are estimated to produce noise levels of approximately 75 dBA at five feet. The nearest building façades to all parcels would be approximately 80 feet away. At this distance, unshielded noise levels would be approximately 51 dBA or 60 dBA CNEL. Existing ambient noise levels exceed 60 dBA CNEL;

therefore, noise from mechanical equipment associated with the proposed project would be below ambient conditions and have a less than significant noise impact.

Emergency Generators

Emergency generators are proposed to be located on Parcels B, D, E, and F. Generators would be located either in the basement or on the ground floor. For the purposes of this analysis, it was conservatively assumed the generators would be located on the ground floor and would be rated at approximately 750 Kilowatts (kW), would be powered by a 60 hertz (Hz) diesel engine, and would be fitted with a manufacturer's acoustical enclosure. Based on file data, sound pressure levels from the generator would be approximately 75 dBA at 5 feet assuming an acoustic enclosure.

Emergency generators are tested monthly for a period of one hour between 7:00 AM and 10:00 PM. Table 3.13-6 below summarizes noise levels at surrounding receptors during the testing period for generators located on Parcels B, D, E, and F.

Table 3.13-6: Noise Levels for Monthly Tests of the Emergency Generators			
Receptor	Distance from Center of the Generator Room	L_{eq}, dBA	CNEL, dBA
Parcel B			
Parcel C/D, south	80 feet	51	47
Parcel A, west	100 feet	49	45
Multi-Family Residential, north	135 feet	46	42
Cemetery, east	400 feet	<40	<40
Parcel D			
Parcel B, north	80 feet	51	47
Parcel E, west	100 feet	49	45
Cemetery, east	230 feet	42	<40
Parcel E			
Parcel C/D, east	80 feet	51	47
Multi-Family, south	90 feet	50	46
Parcel F, west	100 feet	49	45
Parcel A, north	250 feet	41	<40
Parcel F			
Parcel A, north	60 feet	53	49
Parcel E, east	80 feet	51	47

Table 3.13-6: Noise Levels for Monthly Tests of the Emergency Generators			
Receptor	Distance from Center of the Generator Room	L _{eq} , dBA	CNEL, dBA
Multi-Family, south	100 feet	48	44
Single Family, west	170 feet	44	40

As shown in Table 3.13-6 above, emergency generator noise during testing would not exceed 53 dBA L_{eq} or 49 dBA CNEL at any adjacent receptor. This would be below the existing ambient noise levels at the surrounding receptors; therefore, emergency generator noise would be less than significant. **(Less than Significant Impact with Mitigation Incorporated)**

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

Future development under the project may generate perceptible vibration in the immediate vicinity when heavy equipment or impact tools (e.g. jackhammers, hoe rams) are used. Construction activities would include site demolition work, preparation work, excavation of below-grade levels, foundation work, and new building framing and finishing. Construction activities, such as the use of jackhammers, rock drills and other high-power or vibratory tools, and rolling stock equipment (tracked vehicles, compactors, etc.), may generate substantial vibration in the immediate vicinity. Vibration levels would vary depending on soil conditions (e.g., rocks vs. soft soil), construction methods (the project does not propose pile driving), the equipment used (e.g., vibratory roller vs. small bulldozers and graders), and distance.

The City does not define quantitative vibration thresholds; therefore, a conservative vibration limit of 0.3 in/sec PPV has been used, consistent with California Department of Transportation guidelines. Table 3.13-7 below summarizes the vibration levels at the nearest building facades around the project site.

Table 3.13-7: Vibration Source Levels for Construction Equipment						
Equipment		PPV at 25 ft. (in/sec)	Vibration Levels at Nearest Surrounding Building Façades (in/sec PPV)			
			South Residential (20 ft)	East Commercial (60 ft)	Southeast Residential (75 ft)	West Residential (85 ft)
Clam shovel drop		0.202	0.258	0.077	0.060	0.053
Hydromill (slurry wall)	In soil	0.008	0.010	0.003	0.002	0.002
	In rock	0.017	0.022	0.006	0.005	0.004
Vibratory Roller		0.21	0.268	0.080	0.063	0.055
Hoe Ram		0.089	0.114	0.034	0.027	0.023
Large bulldozer		0.089	0.114	0.034	0.027	0.023
Caisson drilling		0.089	0.114	0.034	0.027	0.023

Table 3.13-7: Vibration Source Levels for Construction Equipment					
Equipment	PPV at 25 ft. (in/sec)	Vibration Levels at Nearest Surrounding Building Façades (in/sec PPV)			
		South Residential (20 ft)	East Commercial (60 ft)	Southeast Residential (75 ft)	West Residential (85 ft)
Loaded trucks	0.076	0.097	0.029	0.023	0.020
Jackhammer	0.035	0.045	0.013	0.010	0.009
Small bulldozer	0.003	0.004	0.001	0.001	0.001

As shown in Table 3.13-7, vibration levels at nearby buildings would not exceed 0.3 in/sec PPV. Thus, construction vibration impacts would be less than significant. **(Less than Significant Impact)**

Impact NOI-3: The project would not be located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport. The project would not expose people residing or working in the project area to excessive noise levels. **(Less than Significant Impact)**

The SFO airport is located approximately five miles southeast of the project site. The project site is located outside the 65 dBA CNEL noise contour of SFO; however, the project site is located within the 60 dBA CNEL noise contour. The interpolated CNEL noise levels due to aircraft flyovers is estimated to be 63 DBA, which is consistent with the City's 65 dBA CNEL threshold for aircraft noise (General Plan Task HE-4.2). **(Less than Significant Impact)**

3.13.2.2 *Cumulative Impacts*

Impact NOI-C: The project would not result in a cumulatively considerable contribution to a cumulatively significant noise impact. **(Less than Significant Cumulative Impact)**

Construction

While cumulative projects could be constructed at the same time as the proposed project and result in a temporary construction noise increase, all projects in the City would be required to comply with the City's Municipal Code, as well as implement similar measures as those identified under Impact NOI-1. Nevertheless, if the proposed project's construction schedule were to overlap one or more of the cumulative projects' construction schedules for a consecutive 12 months or more and if the same sensitive receptors were impacted, the project would have a cumulatively considerable contribution to a cumulative construction noise impact.

This would not occur, however, as the nearest cumulative project for which construction timeframes could overlap is the Serramonte Condominiums and Hotel project located at 525-595 Serramonte Boulevard, 500 feet northeast of the project site. These projects would have a similar nearest sensitive receptor, located across Serramonte Boulevard north of the project site; however, construction of the Serramonte Condominiums and Hotel project is anticipated to last only 18 months

and start construction before the proposed project. Thus, construction schedules would not overlap one or more years and a significant noise and vibration impact would not occur. **(Less than Significant Cumulative Impact)**

3.13.3 Non-CEQA Effects

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

Exterior Noise

The exterior noise threshold established in the City's General Plan for new residential uses is 70 dBA CNEL, for commercial uses it is 75 dBA CNEL, and for open space it is 75 dBA CNEL. Noise affecting the project site under future conditions will continue to be vehicular traffic on Serramonte Boulevard and Callan Boulevard, and aircraft noise from SFO. Based on the transportation impact assessment prepared for the project, noise along Serramonte Boulevard and Callan Boulevard from growth in future traffic volumes is expected to increase by approximately one to two dBA CNEL above existing conditions. Existing ambient noise levels at the project site are at most 67 dBA CNEL; therefore, future noise levels at the project site would be at or below the 70 dBA CNEL threshold for residential uses and below the 75 dBA CNEL threshold for commercial and open space uses.

Parcel B Development Project

The Parcel B Development project includes a podium plaza and a rooftop terrace as outdoor uses for the residential units. The podium plaza would be bounded on three sides by the proposed building, to the north, west, and south, which would ensure noise levels at the plaza would be below the 70 dBA CNEL threshold. The rooftop terrace is located at the southeast corner of the building and would face Callan Boulevard. Noise levels at this height and location are estimated to be below the 70 dBA CNEL threshold as well.

The Parcel B Development Project also includes a public park and trail system along the eastern portion of Parcel B, facing Callan Boulevard. As discussed above, future ambient noise levels at the project site (with the addition of project traffic) would be 70 dBA CNEL or less; therefore, the noise levels at the public park would be below the 75 dBA CNEL noise threshold.

A retail plaza would also be located along the western side of the proposed Parcel B Development project. This retail plaza would be facing Serramonte Boulevard; however, future ambient noise levels at the project site (with the addition of project traffic) would be 70 dBA CNEL or less; therefore, the noise levels at the retail plaza would be below the 75 dBA CNEL noise threshold.

Precise Plan

Future development under the proposed Precise Plan on Parcels C, D, E, and F would include additional housing, commercial space, public parks, and trails along the perimeter of the project site.

While specific development plans are currently unavailable, future noise levels at these locations are expected to be less than or equal to Parcel B because they are no closer to major noise sources than Parcel B. As discussed above, exterior noise levels at Parcel B would meet City thresholds for exterior noise levels for residential, commercial, and open space uses. Thus, future noise levels on Parcel C, D, E, and F would also meet City thresholds.

Interior Noise

The California Building Code establishes an interior noise threshold of 45 dBA CNEL for multi-family residential units. The California Green Building Standards Code (CALGreen) requires that interior noise levels be maintained at 50 dBA $L_{eq}(1-hr)$ or less during hours of operation within the proposed non-residential spaces within the proposed mixed-use buildings.

Parcel B Development Project

For the proposed residential portion of the Parcel B Development project, the residential building would be setback approximately 80 feet from the centerline of Serramonte Boulevard and have direct line-of-sight to the roadway. At this distance, units along the northern façade would be exposed to noise levels of 66 dBA CNEL. When aircraft noise is added, northern façade units would be exposed to noise levels of 68 dBA CNEL. The eastern façade of the proposed residential building would be setback approximately 330 feet from Callan Boulevard and have direct line-of-sight to the roadway. At this distance, units along the east façade would be exposed to noise levels of 63 dBA CNEL. When aircraft noise is added, eastern façade units would be exposed to noise levels of 66 dBA CNEL. The western and southern facades of the proposed residential building do not have direct line of sight to any surrounding roadways. The units along these facades would be exposed to future exterior roadway noise levels of up to 60 dBA CNEL. The combined roadway and aircraft noise level at the eastern façade of the proposed building would be 65 dBA CNEL.

Assuming standard construction with windows open, the future interior level for the rooms facing the roadways is expected to be 53 dBA CNEL at the northern façade, 51 dBA CNEL at the eastern façade, and 50 dBA CNEL at the southern and western façades. With windows closed, the future interior level would range from 43 to 48 dBA CNEL at the northern façade, 41 to 46 dBA CNEL at the eastern façade, and 40 to 45 dBA CNEL at the southern and western façades. The proposed residential units would thus require noise insulation features and forced-air mechanical ventilation systems to meet the state's interior noise threshold of 45 dBA CNEL to allow residents to maintain windows in the closed position. With implementation of the below condition of approval (specific to the Parcel B Development project), interior noise levels would meet the state's interior noise standard of 45 dBA CNEL.

Parcel B Development Project Condition of Approval:

- Provide a suitable form of forced-air mechanical ventilation, as determined by the local building official, for all residential buildings, so that windows can be kept closed to control noise.
- Provide sound-rated windows and doors for the northern façade of the proposed building to maintain interior noise levels or below the City's 45 dBA CNEL interior noise threshold. Preliminary calculations show that sound-rated windows and doors with minimum STC

ratings of 30 would be satisfactory for units facing Serramonte Boulevard to meet the interior noise threshold. Standard residential grade windows and doors (minimum STC 26) would be required for all remaining units.

- A qualified acoustical specialist shall prepare a detailed analysis of interior residential noise levels resulting from all exterior sources during the final design phase of the project pursuant to requirements set forth in the General Plan and State Building Code. The study will review the final site plan, building elevations, and floor plans prior to construction and confirm building treatments necessary to reduce interior noise levels to 45 dBA CNEL or less. Treatments would include, but are not limited to, sound-rated windows and doors as specified above, acoustical caulking, protected ventilation openings, etc. The specific determination of what noise insulation treatments are necessary shall be conducted on a unit-by-unit basis during final design of the project. Results of the analysis, including the description of the necessary noise control treatments, shall be submitted to the City, along with the building plans and approved design, prior to issuance of a building permit.

The ground floor of the proposed residential building would be used for commercial purposes. Standard construction materials for commercial uses would provide about 25 to 30 dBA of noise reduction in interior spaces assuming the inclusion of adequate forced-air mechanical ventilation systems. With a setback of about 80 feet from Serramonte Boulevard and 330 feet from Callan Boulevard, the future exterior roadway noise along the commercial use façades are expected to range from 64 to 67 dBA $L_{eq}(1-hr)$. The combined roadway and aircraft noise level at the eastern façade of the proposed building would range from 69 to 70 dBA $L_{eq}(1-hr)$. Using standard construction materials with the inclusion of forced-air mechanical ventilation, interior noise levels at the commercial use portion would range from 37 to 45 dBA $L_{eq}(1-hr)$ during the peak daytime hour. This would meet the CALGreen threshold of 50 dBA $L_{eq}(1-hr)$ or less during hours of operation.

Precise Plan

Parcels C and D have direct lines of sight to Callan Boulevard, with a setback of approximately 150 feet from the centerline. At this distance, the Parcels C and D would be exposed to a future exterior roadway noise level of up to approximately 66 dBA CNEL. The combined roadway and aircraft noise level at the eastern façade of future buildings on Parcels C and D would be 68 dBA CNEL. Assuming standard construction with windows open, the future interior noise level for residential units facing the roadway is expected to be 53 dBA CNEL. With windows closed, the future interior level would range from 43 to 48 dBA CNEL. In order to allow residents to maintain windows in the closed position for noise control, the proposed residential units would thus require noise insulation features and forced-air mechanical ventilation systems to meet the City's interior noise thresholds. With implementation of the below condition of approval (specific to future development under the proposed Precise Plan), interior noise levels would meet the state's interior noise standard of 45 dBA CNEL.

Precise Plan Condition of Approval:

- Provide a suitable form of forced-air mechanical ventilation, as determined by the local building official, for all residential buildings, so that windows can be kept closed to control noise.

- Provide sound-rated windows and doors for Parcels C and D to maintain interior noise levels or below the City's 45 dBA CNEL interior noise threshold. Preliminary calculations show that sound-rated windows and doors with minimum STC ratings of 30 would be satisfactory for units facing Callan Boulevard to meet the interior noise threshold. Standard residential grade windows and doors (minimum STC 26) would be required for all remaining units.
- A qualified acoustical specialist shall prepare a detailed analysis of interior residential noise levels resulting from all exterior sources during the final design phase of the project pursuant to requirements set forth in the General Plan and State Building Code. The study will review the final site plan, building elevations, and floor plans prior to construction and confirm building treatments necessary to reduce interior noise levels to 45 dBA CNEL or less. Treatments would include, but are not limited to, sound-rated windows and doors as specified above, acoustical caulking, protected ventilation openings, etc. The specific determination of what noise insulation treatments are necessary shall be conducted on a unit-by-unit basis during final design of the project. Results of the analysis, including the description of the necessary noise control treatments, shall be submitted to the City, along with the building plans and approved design, prior to issuance of a building permit.

Parcels E and F do not have direct line of sight to any surrounding roadways; thus, future development on these parcels would be exposed to a combined roadway and aircraft noise level of 64 dBA CNEL. Assuming standard construction with windows open, the future interior levels for the residential units is expected to be 49 dBA CNEL. With windows closed, the future interior noise level would range from 39 to 44 dBA CNEL, which would meet the state's interior noise threshold of 45 dBA CNEL.

Parcels C, D, E, and F could also include commercial uses on the ground floor of future residential buildings. Commercial uses on Parcels C and D would be exposed to a combined roadway and aircraft noise level of 69 to 70 dBA $L_{eq}(1-hr)$. Using standard construction materials with the inclusion of forced-air mechanical ventilation, interior noise levels at the commercial use portion of Parcels C and D would range from 37 to 45 dBA $L_{eq}(1-hr)$ during the peak daytime hour. Commercial uses on Parcels E and F would be exposed to a combined roadway and aircraft noise level of up to 65 dBA $L_{eq}(1-hr)$. Using standard construction materials with the inclusion of forced-air mechanical ventilation, interior noise levels at the commercial use portion of Parcels E and F would range from 35 to 40 dBA $L_{eq}(1-hr)$ during the peak daytime hour. Based on the above discussion, future commercial uses on Parcel C, D, E, and F would meet the CALGreen threshold of 50 dBA $L_{eq}(1-hr)$ or less during hours of operation.

3.14 POPULATION AND HOUSING

3.14.1 Environmental Setting

3.14.1.1 *Regulatory Framework*

State

Housing-Element Law

State requirements mandating that housing be included as an element of each jurisdiction's general plan is known as housing-element law. The Regional Housing Need Allocation (RHNA) is the state-mandated process to identify the total number of housing units (by affordability level) that each jurisdiction must accommodate in its housing element. California housing-element law requires cities to: 1) zone adequate lands to accommodate its RHNA; 2) produce an inventory of sites that can accommodate its share of the RHNA; 3) identify governmental and non-governmental constraints to residential development; 4) develop strategies and a work plan to mitigate or eliminate those constraints; and 5) adopt a housing element and update it on a regular basis.⁶⁸ The City of Daly City Housing Element and related land use policies were last updated in 2015.

California Department of Housing and Community Development (HCD) conducted a Regional Housing Needs Determination for the Bay Area based on population projections and determined 441,176 new units must plan to be built in the region from 2023 to 2031. In 2021, ABAG in consultation with local jurisdictions and regional stakeholders, developed a methodology to assign the Bay Area's 2023 to 2031 RHNA. Following the allocation of housing units to each jurisdiction, an appeals process was conducted for cities and counties to change their allocation. In December, ABAG certified the RHNA Plan for the San Francisco Bay Area. According to RHNA Plan, Daly City is allocated a total of 4,838 total housing units. This includes 1,336 very low income units, 769 low income units, 762 moderate income units, and 1,971 above moderate income units.⁶⁹ The City is in the process of preparing an update to the Housing Element covering the timeframe from 2023-2031.

Regional and Local

Plan Bay Area 2050

Plan Bay Area 2050 is a long-range plan for the nine-county San Francisco Bay Area that provides strategies that increase the availability of affordable housing, support a more equitable and efficient economy, improve the transportation network, and enhance the region's environmental resilience. Plan Bay Area 2050 promotes the development of a variety of housing types and densities within identified Priority Development Areas (PDAs). PDAs are areas generally near existing job centers or frequent transit that are locally identified for housing and job growth.⁷⁰

⁶⁸ California Department of Housing and Community Development. "Regional Housing Needs Allocation and Housing Elements" Accessed November 19, 2021. <http://hcd.ca.gov/community-development/housing-element/index.shtml>.

⁶⁹ Association of Bay Area Governments. *Final Regional Housing Needs Allocations (RHNA) Plan: San Francisco Bay Area, 2023-2031*. March 2022. Page 27.

⁷⁰ Association of Bay Area Governments and Metropolitan Transportation Commission. *Plan Bay Area 2050*. October 21, 2021. Page 20.

ABAG allocates regional housing needs to each city and county within the San Francisco Bay Area, based on statewide goals. These allocations are designed to lay the foundation for Plan Bay Area 2050’s long-term envisioned growth pattern for the region. ABAG also develops a series of forecasts and models to project the growth of population, housing units, and jobs in the Bay Area. ABAG, MTC, and local jurisdiction planning staff created the Forecasting and Modeling Report, which is a technical overview of the of the growth forecasts and land use models upon which Plan Bay Area 2050 is based.

Daly City 2030 General Plan

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

Policy/Task	Description
Policy HE-1	Maintain and, where possible, create larger housing development sites throughout the City.
Policy HE-6	Assure that adequate development sites exist on the Potential Housing Sites Inventory List to ensure compliance with the City’s Regional Housing Need Allocation
Policy LU-4	Provide regulatory incentives for developers to construct higher-density mixed-use development along Mission Street, Geneva Avenue, and any other locations within close proximity to public transit.

3.14.1.2 *Existing Conditions*

The population of Daly City was estimated to be 108,599 in January 2021, with an average of 3.33 persons per household.⁷¹ Buildout of the City’s General Plan is anticipated to result in 2,157 new housing units and 3,990 new jobs through 2030. ABAG estimates that in 2035, the City’s population will grow to 115,015 people, while jobs will increase from approximately 18,370 (as of 2020) to 19,180 in 2035.⁷²

The 1985 Precise Plan (described in greater detail in Section 2.2.1 Precise Plan) planned for the development of the project site with up to 175 residential units and approximately 700,000 square feet of office space in the project site area. The project site is identified as site number 15, “Serramonte Del Rey”, in the City’s current Housing Element, and consistent with the 1985 Precise Plan, was allocated 175 housing units, including 35 very low income, 18 low income, 70 moderate income, and 53 above moderate income units.

Parcel A has been developed with 122 multifamily units intended primarily for JUHSD employees. The rest of the Precise Plan area (Parcels B through F) contains no residential units.

⁷¹ California Department of Finance. “E-5 City/County Population and Housing Estimates – January 1, 2021.” Accessed November 19, 2021. <http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-5/>.

⁷² Association of Bay Area Governments and Metropolitan Transportation Commission. “Projections 2040.” Accessed November 22, 2021. <http://projections.planbayarea.org/>.

3.14.2 **Impact Discussion**

For the purpose of determining the significance of the project's impact on population and housing, would the project:

- 1) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?
- 2) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

3.14.2.1 ***Project Impacts***

Impact POP-1:	The project would not induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure). (Less than Significant Impact)
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A project can induce substantial population growth by: 1) proposing new housing beyond projected or planned development levels, 2) generating demand for housing as a result of new businesses, 3) extending roads or other infrastructure to previously undeveloped areas, or 4) removing obstacles to population growth (i.e., expanding capacity of a wastewater treatment plant beyond that necessary to serve planned growth).

Direct Impacts

As noted in Section 3.14.1.2 Existing Conditions, the adopted 1985 Precise Plan allows the project site to be developed with up to 175 residential units and 700,000 square feet of office uses.

Compared to what is allowed by the 1985 Precise Plan, the project would result in a net increase of 1,060 residential units and a net decrease of 684,000 square feet of employment uses (office and retail). This net change in development would result in approximately 3,403 additional residents.⁷³ Compared to the buildout of the General Plan, the project would represent an approximately three percent net increase in the City's population.⁷⁴

While the project would result in an increase in population and housing compared to what is allowed in the adopted 1985 Precise Plan and General Plan, the project would be consistent with the City's goal of maximizing opportunities for higher-density housing (General Plan Policy HE-1 and Policy LU-4) and meeting the City's RHNA target (General Plan Policy HE-6). The project is also consistent with the intent of Plan Bay Area 2050 because it proposes additional residential units for

⁷³ 1,235 (number of housing units proposed) minus 175 (number of planned housing units) equals 1,060 housing units. Based on the City's average number of persons per housing unit (3.21), the 1,060 units would generate 3,403 additional residents. As the majority of employment uses would be eliminated, demand for housing from new businesses was assumed to be zero. Source: State of California, Department of Finance. E-5 Population Estimates for Cities, Counties, and the State—January 1, 2021-2022. May 2022.
<https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2022/>.

⁷⁴ Buildout of the City's General Plan would result in 106,388 residents.

the City to meet its RHNA targets. For these reasons, the project would not directly induce substantial population growth in the area, and the environmental effects of the new population growth from the project have been disclosed throughout this EIR. **(Less than Significant Impact)**

Indirect Impacts

As discussed in Section 3.17 Transportation, the project would require transportation infrastructure improvements to address intersection deficiencies and bicycle and pedestrian facilities. The transportation improvements would serve the proposed project, as well as existing and planned projects.

The project would also require connections to existing utility lines in the area. These standard connections to existing water, sewer, and storm drain systems to serve the project would not induce growth beyond the proposed project, as they are designed to serve the project population and not sized to serve additional growth, nor would they remove an existing constraint on development that would allow for unplanned growth. Based on the above discussion, the project would not indirectly induce substantial population growth through its infrastructure improvements. **(Less than Significant Impact)**

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

The project site is currently developed with the existing Serramonte Del Rey JUHSD campus, which includes the main campus building, a General Education Department building, two one-story portables, storage bungalows, and a Comcast relay station. None of these structures are inhabited or provide housing. The 122 multifamily housing units recently constructed on Parcel A will continue to exist regardless of the remainder of the proposed Precise Plan being approved. Therefore, the proposed project would not displace substantial numbers of existing people or housing necessitating the construction of replacement housing elsewhere. **(No Impact)**

3.14.2.2 Cumulative Impacts

Impact POP-C: The project would not result in a cumulatively considerable contribution to a cumulatively significant population and housing impact. **(Less than Significant Cumulative Impact)**

The geographic area for cumulative population and housing impacts is the City boundaries, and can be extended further to San Mateo County and the San Francisco Bay region. Past, present, and pending development projects contribute to the City's, County's, and region's population and housing impact.

As discussed under Impact POP-1, compared to the City's ABAG estimated population in 2035, the proposed project would result in an approximately three percent increase in residents citywide. This increase in growth citywide is not substantial, and it would not serve to create demand for additional housing within or outside the City. For these reasons, implementation of the project would not have a

cumulatively considerable contribution to a significant cumulative population and housing impact.
(Less than Significant Cumulative Impact)

3.15 PUBLIC SERVICES

3.15.1 Environmental Setting

3.15.1.1 *Regulatory Framework*

State

Government Code Section 66477

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

Government Code Section 65995 through 65998

California Government Code Section 65996 specifies that an acceptable method of offsetting a project's effect on the adequacy of school facilities is the payment of a school impact fee prior to the issuance of a building permit. Government Code Sections 65995 through 65998 set forth provisions for the payment of school impact fees by new development by "mitigating impacts on school facilities that occur (as a result of the planning, use, or development of real property" (Section 65996[a]). The legislation states that the payment of school impact fees "are hereby deemed to provide full and complete school facilities mitigation" under CEQA (Section 65996[b]).

Developers are required to pay a school impact fee to the school district to offset the increased demands on school facilities caused by the proposed residential development project. The school district is responsible for implementing the specific methods for mitigating school impacts under the Government Code.

Local

Daly City 2030 General Plan

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

Policy/Task	Description
Policy RME-13	Require the dedication of parkland or the payment of an in-lieu fee in accordance with Subdivision Map Act.
Policy RME-14	Prioritize the dispersal of park in-lieu fees collected from the development of new subdivisions to ensure that the fees are spent in the appropriate areas (see Program RME-3)
Task SE-3.1	Support and maintain the City's Insurance Service Office (ISO) rating of a Class 2, which establishes the fire insurance rates for the City.

Task SE-3.2	Provide for a seven (7) minute total reflex time for arrival of a first due company to 90 percent of all emergency incidents.
Task SE-3.3	Provide for an eleven (11) minute total reflex time for arrival of multiple fire companies to 90 percent of all structure fires.
Task SE-3.4	Maintain fire company reliability, whereby 90 percent of all incidents are handled by the district fire company.

Daly City Municipal Code

Daly City Municipal Code Section 16.30.400 requires the dedication of park space of three acres per 1,000 people which can be satisfied through either on-site park construction or land dedication. Public facility fees are described in Section 3.32.130 which are required upon issuance of a building permit to pay for municipally owned public facilities, including but not limited to city administrative facilities, fire facilities and equipment, libraries, police facilities and equipment, community recreation centers, street improvements and water and sewage facilities.

City of Daly City Capital Improvement Plan

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

City of Daly City Parks and Open Space Master Plan

The Parks and Open Space Master Plan is intended to guide decision making to help the City maintain, manage and develop the envisioned park and open space system and provide the community with the recreational opportunities. The Parks and Open Space Master Plan evaluates the existing park system and relies upon extensive community engagement to support the expansion, improvement, and protection of the park and open space system for the future.

3.15.1.2 *Existing Conditions*

Fire Protection Services

Fire protection services in Daly City are provided by a joint powers authority, the North County Fire Authority (NCFA). The NCFA consists of fire and emergency medical response services for the cities of Brisbane, Daly City, and Pacifica.⁷⁵ The NCFA responds to all fires, hazardous material spills, and medical emergencies within the constituent cities. Pursuant to Daly City General Plan Policy SE-3.3, fire protection service performance is measured by total reflex time. Total reflex time

⁷⁵ North County Fire Authority. "Frequently Asked Questions". Accessed November 16, 2021. <https://northcountyfire.org/ncfa-overview/frequently-asked-questions/>

refers to the total amount of time that passes from receipt of the emergency call to the arrival of the responding unit at the scene.

The nearest fire station to the project site is the City of Daly City Fire Station Number 94, located approximately 0.4 miles to the southeast at 444 Gellert Boulevard.

Police Protection Services

Police protection services are provided to the project site by the Daly City Police Department (DCPD). The DCPD is headquartered at 333 90th Street, approximately 1.5 mile north of the project site, and employs 111 sworn and 43 non-sworn personnel. Pursuant to Daly City General Plan Policy SE-3.2, police protection service performance is measured by total reflex time, as described above in Fire Protection Services.

Schools

The project site is located within the Jefferson Elementary Unified School District, and the Jefferson Union High School District. Students in the project area would attend Daniel Webster Elementary School and Fernando Rivera Middle School. Students would attend one of the four high schools, Terra Nova High School, Oceana High School, Westmoor High School, or Jefferson High School, depending on the capacity of each facility. The closest high school to the project site is Westmoor High School, approximately 1.7 miles from the project site. The current enrollment capacities for these schools are shown in Table 3.15-1 below. As shown in Table 3.15-1, there is currently available capacity at the schools.

Table 3.15-1: School Enrollment and Capacity			
School	Existing Capacity	Current Enrollment	Available Capacity
Daniel Webster Elementary School ¹	598	308	290
Fernando Rivera Middle School ¹	808	499	309
Westmoor High School ²	2,096	1,250	846
¹ School data for the 2021-2022 school year. Source: Vidales, Bernardo. Superintendent, Jefferson Elementary School District. Personal Communication. July 7, 2022.			
² SchoolWorks, Inc. <i>Jefferson Union High School District 2021/2022 Demographics and Enrollment Projections</i> . March 2022.			

Parks and Recreational Facilities

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

Thirteen municipal parks and twelve tot lots are located in Daly City, resulting in a total of 82.95 acres of developed public recreational open space. The City has 27 recreational facilities dispersed throughout the various City neighborhoods to serve residents.

The nearest parks to the project site are Gellert Park, located approximately 800 feet southeast of the project site, Edgewood Park and Fairmont Field located in Pacifica approximately 0.5 miles to the southwest of the project site, Mussel Rock Park approximately 0.5 miles to the west, and Cameo Tot Lot located approximately 0.6 miles to the south.

Libraries, Community Centers, and Other Public Services

In addition to the aforementioned public services, Daly City also has four public libraries: the Serramonte Main Branch, John Daly, Westlake, and Bayshore. The nearest library to the project site is the Serramonte Main Branch, located approximately 0.4 miles to the southeast.

There are two community centers, one art center, and one public clubhouse in Daly City. The nearest public facility is the Teglia Community Center, located approximately two miles northeast of the project site.

3.15.2 Impact Discussion

For the purpose of determining the significance of the project's impact on public services, would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

- 1) Fire protection?
- 2) Police protection?
- 3) Schools?
- 4) Parks?
- 5) Other public facilities?

3.15.2.1 *Project Impacts*

Impact PS-1:	The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services. (Less than Significant Impact)
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As discussed in Section 3.14 Population and Housing, buildout of the project would result in a net increase of 1,060 residential units and a net decrease of 684,000 square feet of employment uses (office and retail) compared to the adopted 1985 Precise Plan. The General Plan EIR (which includes

buildout of the 1985 Precise Plan) concluded that buildout of the General Plan would not require the expansion of fire facilities and stated that new fire facilities were not included in the City's Capital Improvement Plan.⁷⁶ While the proposed project would increase the number of residential units on the project site, with the corresponding reduction in employment uses, the proposed project is not anticipated to generate additional demand for fire services. In addition, as part of the permitting process, the NCFA would review the proposed project before permits are issued to ensure compliance with all applicable fire and building code standards and to ensure that adequate fire and life safety measures are incorporated into the project in compliance with all applicable state and city fire safety regulations. For these reasons, the project's potential impact on fire protection services would be less than significant. **(Less than Significant)**

Impact PS-2: The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection services. **(Less than Significant Impact)**

As discussed above under Impact PS-1 with regard to fire protection services, the proposed project is similarly not anticipated to generate additional demand for police protection services, as the intensity of uses between the adopted 1985 Precise Plan and proposed project would be similar. The General Plan EIR (which includes buildout of the 1985 Precise Plan) concluded that buildout of the General Plan would not require the expansion of police facilities and stated that new police facilities were not included in the City's Capital Improvement Plan.⁷⁷ Developing the site with a substantially larger resident population and substantially smaller employment population would not require the expansion or alteration of police facilities. For these reasons, the project's potential impact on police protection services would be less than significant. **(Less than Significant)**

Impact PS-3: The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for schools. **(Less than Significant Impact)**

Students generated from the project would likely attend Daniel Webster Elementary School and Fernando Rivera Middle School in the Jefferson Elementary School District, and Westmoor High School in the Jefferson Union High School District. Implementation of the project would result in a net increase of 1,235 residential units compared to existing conditions, including the recently constructed Parcel A units. According to the Developer Fee Justification Study for Jefferson Elementary School District published in 2014, the state-wide student generation factor which

⁷⁶ City of Daly City. *General Plan Update Draft Environmental Impact Report*. October 2021. Page 3.11-9.

⁷⁷ Ibid.

identifies the number of students per housing unit is 0.5 for grades K-8.⁷⁸ Therefore, using this rate, the proposed project would generate approximately 618 new students that would attend Daniel Webster Elementary School and Fernando Rivera Middle School. The Jefferson Union High School District has a student yield rate of 0.09 high school students per residential unit.⁷⁹ Therefore, the project would generate approximately 112 new high school students attending Terra Nova High School, Oceana High School, Westmoor High School, or Jefferson High School depending on the capacity at each facility. Pursuant to Section 65996 of the State Government Code, payment of school impact fees established by SB 50 is deemed to constitute full and complete mitigation for school impacts from development. Fulfillment of this requirement would mitigate the development of residential uses' impacts to schools to a less than significant level. **(Less than Significant Impact)**

Impact PS-4: The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for parks. **(Less than Significant Impact)**

City of Daly City Municipal Code Section 16.30.400 has a standard for parks of three acres per 1,000 residents. As discussed above in Section 3.14 Population and Housing, the proposed project would add approximately 3,403 new residents to the project site and would be required to provide 10.2-acres of new park space.⁸⁰ The Parcel B Development project includes a public park, a recreational trail, and a public retail plaza, totaling approximately 0.8-acre. Additional park space is proposed as part of the buildout of the Precise Plan, but exact acreage is unknown at this time and will be determined as Parcels C-F are developed. The City of Daly City is served by several parks and recreational facilities, including 13 municipal parks and 12 tot lots, resulting in a total of 82.95 acres of developed public recreational open space which equals approximately 0.82 acres per 1,000 residents. However, according to the General Plan EIR, this parkland to population ratio does not take into account the numerous regional park facilities accessible to residents.

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

⁷⁸ Jefferson Elementary School District. *Developer Fee Justification Study for Jefferson Elementary School District*. February 2014. Accessed July 21, 2017.

⁷⁹ SchoolWorks, Inc. *Jefferson Union High School District 2021/2022 Demographics and Enrollment Projections*. March 2022.

⁸⁰ The City's General Plan park land dedication calculation is based on 3,403 residents/1,000 x 3 = 10.2 acres of parkland.

space than shown in the above ratio, although these facilities are trail-oriented, rather than active facilities (such as those that include playfields).

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

In addition, the City of Daly City Municipal Code currently has parkland dedication standards within Title 16 – Subdivisions. Section 16.30.400 of the Municipal Code has a standard for parks of three acres per 1,000 people. In order to meet this requirement, the project would be required to allot 10.2-acres of land as parkland or pay an in-lieu fee equal to the value of the land (plus ten percent toward costs of off-site improvements) according to the Municipal Code parkland dedication standard. The payment of in-lieu fees is an accepted method to offset a project's impacts to park facilities in that it allows the lead agency to collect the in-lieu fees from a number of projects to acquire or improve parkland in the area to serve new residents. **(Less than Significant Impact)**

Impact PS-5:	The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for other public facilities. (Less than Significant Impact)
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Implementation of the proposed project would generate new residents in the City. These new residents would increase the demand for libraries, community centers, and other public facilities in comparison with existing conditions. The project would be subject to the Daly City Municipal Code Section 3.32.130, which requires new developments to pay fees that support the maintenance of city-owned facilities, including administrative facilities, community centers, and the public library system. If it is determined expansion of a library (or other public facility such as a community center) is required, the expansion would be subject to its own separate environmental review. It is expected that any future library or other public facilities would be constructed on previously disturbed sites within the existing urban area of the City. Based on previous analyses for library facilities on previously disturbed sites on the San Francisco Bay peninsula, the impacts associated with the construction of library facilities can be mitigated to a less than significant level with implementation of standard mitigation measures (such as the ones identified in Sections 3.3 Air Quality, 3.4 Biological Resources, 3.5 Cultural Resources, 3.10 Hydrology and Water Quality, 3.13 Noise and Vibration in this EIR). **(Less than Significant Impact)**.

3.15.2.2 Cumulative Impacts

Impact PS-C:	The project would not result in a cumulatively considerable contribution to a cumulatively significant public services impact. (Less than Significant Cumulative Impact)
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The geographic area for cumulative public services impacts is the City of Daly City.

Fire and Police Protection

As previously discussed under Impact PS-1, the General Plan EIR concluded that implementation of the General Plan would not necessitate the construction of new fire or police stations. The proposed project would not increase demand for fire or police services beyond what is anticipated in the General Plan EIR given the increased resident population on the site would be offset somewhat by a reduction in the substantial employment population that had been planned for the site under the current General Plan land use designation for the site. In addition, the proposed project would be constructed in accordance with current building codes and reviewed by NCFA to ensure appropriate safety features are incorporated to reduce fire hazards. For these reasons, the project would not result in significant cumulative impact to fire or police protection facilities and services.

Schools

Only one of cumulative projects from Table 3.0-1 (Serramonte Condominiums) is a residential project that would generate new students and it is located within the Brisbane Elementary School District; therefore, it would not have any impacts on the Jefferson Elementary School District.⁸¹ Serramonte Condominiums is, however, within the boundary for Jefferson Union High School District.⁸² The Serramonte Condominiums project proposes 323 residential units, which would generate approximately 29 new high school students. Westmoor High School currently has available capacity of 846 students (see Table 3.15-1) and can easily accommodate the proposed project's and the Serramonte Condominiums project's new high school students.

As required by state law (Government Code 65996), the cumulative projects (including the proposed project) shall pay the appropriate school impact fees to impacted school districts to offset the increase demands on school facilities caused by the development. The cumulative projects (including the proposed project), in conformance with state law (Government Code 65996), would not result in significant cumulative impacts to schools.

Parks

The geographic area for cumulative park impacts is the City boundaries. The implementation of the cumulative projects (including the project) would incrementally increase the demand for park facilities. The cumulative projects would be required to construct new park space, pay in-lieu fees,

⁸¹ Jefferson Elementary School District. Boundary Book. Accessed November 18, 2021.

<https://www.jsd.k12.ca.us/District/Department/596-Enrollment-Information>.

⁸² San Mateo County Office of Education. Elementary School Districts, Union High School Districts, and Unified School Districts Map. Accessed November 18, 2021. <https://www.smcoe.org/about/districts-and-schools/school-district-information/>.

and/or dedicate land pursuant to Daly City Municipal Code Section 16.30.400, thereby reducing their impacts on parks to a less than significant level.

Libraries

As previously discussed under Impact PS-4, the project would be required to pay all associated Public Facility Fees associated with the issuance of a building permit. Impacts associated with an increased demand on libraries requiring construction of new facilities would be subject to separate environmental review. For these reasons, the cumulative projects would not result in a significant cumulative impact on libraries and public facilities. **(Less than Significant Cumulative Impact)**

3.16 RECREATION

3.16.1 Environmental Setting

3.16.1.1 *Regulatory Framework*

State

Government Code Section 66477

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

Local

Daly City General Plan 2030

The following policies in the City's General Plan have been adopted for the purpose of reducing or avoiding impacts related to recreation and are applicable to the project.

Policy/Task	Description
Task RME-12.1	Program for and undertake improvements to develop Mussel Rock Park as a passive recreational area for community use (see also Task CST-1.4). All improvements within the park shall be in substantial conformance with a Public Access Management Plan prepared for the site which shall include the following: 1. Public access paths provided in such a way as to ensure connectivity, maximize utility, and provide access along the entirety of the park site. 2. Public access amenities (such as benches, table and chairs, bicycle racks, trash and recycling receptacles, etc.), including benches in the public view overlook at appropriate locations. 3. Public access signs to facilitate, manage, and provide public access to the park, including the provision of directional signs. 4. At a minimum, two interpretive panels relevant to the site shall be provided at locations that maximize their utility.
Policy RME-13	Require the dedication of parkland or the payment of an in-lieu fee in accordance with Subdivision Map Act.
Policy RME-14	Prioritize the dispersal of park in-lieu fees collected from the development of new subdivisions to ensure that the fees are spent in the appropriate areas (see Program RME-3).

City of Daly City Parks and Open Space Master Plan

The Parks and Open Space Master Plan is intended to guide decision making to help the City maintain, manage and develop the envisioned park and open space system and provide the community with the recreational opportunities. The Parks and Open Space Master Plan evaluates the existing park system and relies upon extensive community engagement to support the expansion, improvement, and protection of the park and open space system for the future.

Daly City Municipal Code

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

3.16.1.2 *Existing Conditions*

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

Thirteen municipal parks and twelve tot lots are located in Daly City, resulting in a total of 82.95 acres of developed public recreational open space. The City has 27 recreational facilities dispersed throughout the various City neighborhoods to serve residents.

The nearest parks to the project site are Gellert Park, located approximately 800 feet southeast of the project site, Edgewood Park and Fairmont Field located in Pacifica approximately 0.5 miles to the southwest of the project site, Mussel Rock Park approximately 0.5 miles to the west, and Cameo Tot Lot located approximately 0.6 miles to the south. The demonstration garden located on the project site is not a recognized recreational facility by the City, as it is a private school garden used for classroom instruction. Thus, the removal of the garden as part of the project is not considered a CEQA impact requiring mitigation; however, as discussed in Section 2.2.1.1, JUHSD plans to provide a raised planter beds at their new district offices.

3.16.2 Impact Discussion

For the purpose of determining the significance of the project's impact on recreation:

- 1) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?
- 2) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

3.16.2.1 *Project Impacts*

Impact REC-1: The project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. **(Less than Significant Impact)**

The proposed project would add approximately 3,403 new residents (including the recently constructed Parcel A project) to the project site and would generate additional demand for parks in the project area. As discussed above in Section 3.15 Public Services under Impact PS-4, the project would be required to allot 10.2-acres of land as parkland or pay an in-lieu fee equal to the value of the land (plus ten percent toward costs of off-site improvements) according to the Daly City Municipal Code Section 16.30.400 parkland dedication standard.⁸³ The Parcel B Development project includes a privately owned, publicly accessible park, a recreational trail, and a public retail plaza, totaling approximately 0.8-acre, which would partially off-set demand on nearby recreational facilities. Approximately 6.5 acres of park space is proposed as part of the buildout of the Precise Plan, and the exact acreage will be determined as Parcel C-F are developed. Thus, the project proposes to pay in-lieu fees to offset recreational demand for parkland not provided by the proposed project. The payment of in-lieu fees is an accepted method to offset a project's impacts to park facilities in that it allows the lead agency to collect the in-lieu fees from a number of projects to acquire or improve parkland in the area to serve new residents. **(Less than Significant Impact)**

Impact REC-2: The project would include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. **(Less than Significant Impact)**

The proposed project would construct approximately 0.8-acre of privately-owned, publicly accessible park space as part of the Parcel B Development project. Approximately 6.5 acres of park space is proposed in the plan area the environmental impacts of which are discussed throughout this EIR and determined to be less than significant with mitigation incorporated. The exact amount of park space and design will be determined as Parcel C-F are developed. Construction of the proposed project's recreational facilities would have a less than significant impact on the environment. **(Less than Significant Impact)**

⁸³ The City's General Plan park land dedication calculation is based on $3,403 \text{ residents} / 1,000 \times 3 = 10.2$ acres of parkland.

3.16.2.2 *Cumulative Impacts*

Impact REC-C: The project would not result in a cumulatively considerable contribution to a cumulatively significant recreation impact. **(Less than Significant Cumulative Impact)**

The geographic area for cumulative park impacts is the City boundaries. The implementation of the cumulative projects (including the project) would incrementally increase the demand for park facilities. The cumulative projects would be required to construct new park space, pay in-lieu fees, and/or dedicate land pursuant to Daly City Municipal Code Section 16.30.400, thereby reducing their impacts on parks to a less than significant level. The payment of in-lieu fees is an accepted method to offset a project's impacts to park facilities in that it allows the lead agency to collect the in-lieu fees from a number of projects to acquire or improve parkland in the area to serve new residents. **(Less than Significant Cumulative Impact)**

3.17 TRANSPORTATION

The following discussion is based, in part, on a Transportation Impact Assessment (TIA) prepared for the project by Fehr & Peers. A copy of this report, dated July 2022, is attached to this EIR as Appendix L.

3.17.1 Environmental Setting

3.17.1.1 *Regulatory Framework*

State and Regional

Regional Transportation Plan

MTC is the transportation planning, coordinating, and financing agency for the nine-county San Francisco Bay Area, including San Mateo County. MTC is charged with regularly updating the Regional Transportation Plan, a comprehensive blueprint for the development of mass transit, highway, airport, seaport, railroad, bicycle, and pedestrian facilities in the region. MTC and ABAG adopted Plan Bay Area 2050 in October 2021, which includes a Regional Transportation Plan to guide regional transportation investment for revenues from federal, state, regional and local sources through 2050.

Senate Bill 743

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

SB 743 did not authorize OPR to set specific VMT impact thresholds, but it did direct OPR to develop guidelines for jurisdictions to utilize. In December 2018, OPR released a technical advisory containing recommendations regarding the assessment of VMT, proposed thresholds of significance, and potential mitigation measures for lead agencies to use while implementing the required changes contained in Senate Bill 743 (SB 743). The recommendations were incorporated into CEQA Guidelines Section 15064.3(b), which among other things describes factors that might indicate whether a development project's VMT may be significant.

Regional

San Mateo County Congestion Management Program

The City/County Association of Governments (C/CAG), as the Congestion Management Agency for San Mateo County, is required to prepare and adopt a Congestion Management Program (CMP) on a biennial basis. The purpose of the CMP is to identify strategies to respond to future transportation needs, develop procedures to alleviate and control congestion, and promote countywide solutions. Also included in the CMP is the Traffic Impact Analysis (TIA) Policy, which provides uniform

procedures to analyze traffic impacts. According to the CMP, an acceptable level of service at signalized intersections is LOS E.

San Mateo County Comprehensive Bicycle and Pedestrian Plan

To support and encourage walking and bicycling in San Mateo County, the SMCTA on September 8, 2011, adopted the San Mateo County Comprehensive Bicycle and Pedestrian Plan (CBPP). The CBPP outlines goals and policies designed to support the implementation of the long-term vision for bicycling and walking in the county.

Local

Daly City 2030 General Plan

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

Policy/Task	Description
Policy CE-6	Support regional efforts to improve traffic while accommodating future development.
Policy CE-7	Ensure an effective transit system by supporting the work of other agencies in their efforts to expand public transit in and around Daly City.
Policy CE-13	View transportation improvements (new and retrofit) as opportunities to improve safety, access, and mobility for all travelers and recognize bicycle, pedestrian, and transit modes as integral elements of the transportation system.
Policy CE-16	Strengthen pedestrian access between and within residential areas and schools, commercial areas, recreational facilities, transit centers, and major activity centers in the City.
Policy CE-20	Integrate Complete Streets infrastructure and design features into street design and private construction to create safe and inviting environments for people to walk, bicycle, and use public transportation.
Task CE-1.3	Require a traffic study as part of a complete application for discretionary projects which meet pre-determined criteria established by the City Engineer. The study shall determine the cumulative impact of the project on the City's principal intersections together with approved projects and projects under construction in Daly City and adjacent jurisdictions.
Task CE-1.6	Incorporate a Level of Service (LOS) standard into Daly City's Local Thresholds of Significance Guidelines and use the standard as an evaluation measure for the traffic impacts created by new discretionary projects and to identify future roadway and intersection improvements in the City's Capital Improvement Program. This standard shall be applied as follows: • Require that a minimum LOS D be maintained at all principal intersections.

Policy/Task	Description
	• Where a traffic study identifies that a discretionary project will degrade the Level of Service at any of the City’s principal intersections to below acceptable levels, the City shall, through the environmental review process, require measures to mitigate the anticipated impact to a level of insignificance. • New vehicular traffic created by a discretionary project that causes any of the City’s principal intersections to degrade to LOS F during any traffic period shall be considered a significant impact subject to the preparation of an Environmental Impact Report (EIR). The EIR shall provide both mitigation measures and feasible project alternatives that would effectively mitigate anticipated traffic impacts to a level of insignificance. • Mitigation measures shall include construction of or financial contribution toward traffic improvements that can effectively mitigate the impact within a ten-year timeframe from the project approval date. Traffic impacts which are not fully mitigable within a ten-year timeframe shall be considered temporarily unmitigable and subject to the adoption of a Statement of Overriding Considerations in addition to mitigation measures. • The City shall consider the potential for adoption of a Statement of Overriding considerations related to traffic in instances where there is substantial evidence that the project possesses qualities (including environmental, legal, technical, social, and economic factors) that merit the project’s approval despite the traffic impacts caused by the project. The Local Thresholds of Significance Guidelines may provide additional detail and clarity.
Task CE-10.2	Amend the parking regulation to allow for a 30 percent parking reduction for all mixed-use development projects (as defined in the Zoning Ordinance) and clarify that the mixed-use parking reduction is allowed for buildings containing residential and retail components.
Task CE-13.3	Consider impacts to the existing and future bicycle and pedestrian network when completing environmental review for private development projects and require mitigation measures where necessary and reasonable to ensure that these systems are not impacted.
Task CE-16.9	Require as a condition of development/redevelopment project approval the provision of sidewalks and wheelchair ramps where lacking, repair or replacement of damaged sidewalks, and sidewalks that link directly to building entrances.
Task CE-20.1	In the design of any new roadway and as a part of any development review, ensure that adequate infrastructure is included that promotes a safe and convenient means of travel for all users. This shall include the provision of sidewalks, shared use paths, and, where practical, bicycle lanes.
Task CE-20.7	As a part of all new development, require, where appropriate, the provision of pedestrian-oriented signs, pedestrian-scale lighting, benches, and other street furniture so as to make non-motorized forms of travel comfortable and attractive alternatives to the automobile. Where necessary in new development, the city

Policy/Task	Description
	may require additional sidewalk and/or right-of-way width to accommodate these amenities.

Walk Bike Daly City

The City of Daly City replaced its 2013 Bicycle and Pedestrian Master Plan in 2020 with Walk Bike Daly City, a new master plan for bicycle and pedestrian facilities within the Daly City. Walk Bike Daly City aims to expand the City’s network of pedestrian and bicycle facilities; close gaps in the existing system; enhance connections to key destinations; and, more generally, make walking and biking in Daly City safer, easier and more popular. Improvements identified by Walk Bike Daly City within the Precise Plan area include the construction of separated bikeways on Serramonte Boulevard from St. Francis Boulevard to Gellert Boulevard.

3.17.1.2 *Existing Conditions*

Roadway Network

Regional access to the project site is provided by Highway 1, Interstate (I-) 280, and SR-35 (also known as Skyline Boulevard). Local access to the Precise Plan area is provided via Serramonte Boulevard, Campus Drive, Hickey Boulevard, Callan Boulevard, Gellert Boulevard, Junipero Serra Boulevard, St. Francis Boulevard, and Clarinada Avenue. These roadways are described below.

Highway 1 is a north-south freeway located north of the project site. In the project area, it provides three to five mixed-flow vehicle lanes in each direction of travel. It provides immediate access to the project site via on- and off-ramps at Clarinada Avenue and Serramonte Boulevard.

I-280 is a north-south freeway located east of the project site that extends from San Francisco to San Jose. In the project area, it provides four vehicle lanes in each direction of travel with ramps located at Serramonte Boulevard, the intersection of Serramonte Boulevard and Junipero Serra Boulevard, and at Hickey Boulevard.

Skyline Boulevard is a north-south highway that extends from west San Francisco to San Bruno. It provides most immediate access to the project site at Hickey Boulevard and via the Skyline Boulevard and Highway 1 interchange.

Serramonte Boulevard is a four-lane east-west arterial that extends from St. Francis Boulevard to the west to El Camino Real to the east. Sidewalks are provided on the south side of the street west of Callan Boulevard and on the north side of the street west of Gellert Boulevard. Dedicated bike lanes are provided on both sides east of Callan Boulevard, which become on-street parking lanes to the west. The posted speed limit is 25 miles per hour (mph) in the vicinity of the Project site and 30 mph east of Callan Boulevard.

Campus Drive is currently a discontinuous roadway which is cut off by the project site. South of the project site Campus Drive is a two-lane divided collector roadway extending from Hickey Boulevard to just north of the Summit Shasta School. A complete pedestrian sidewalk is currently provided on the west side of Campus Drive from the project site to Hickey Boulevard; the sidewalk on the east

side of this section of Campus Drive is discontinuous. On-street parking is prohibited. At the north border of the project site a short two-lane section of Campus Drive connects to Serramonte Boulevard opposite Kent Court. As part of the project, Campus Drive would be connected as a through roadway extending from Hickey Boulevard to Serramonte Boulevard.

Hickey Boulevard is a four-lane east-west collector that stretches from Monterey Road to the west to El Camino Real to the east. It crosses Skyline Boulevard and Interstate 280. Sidewalks on both sides and on-street parking on the north side are provided west of Gellert Boulevard. The posted speed limit in the study area is 35 mph.

Callan Boulevard is a north-south local street that alternates between one and two vehicle lanes in each direction of travel in the project vicinity. Sidewalks are provided on both sides and bike lanes are provided south of Hickey Boulevard. On-street parking is intermittent. The posted speed limit is 30 mph to the south of Hickey Boulevard and 35 mph to the north.

Gellert Boulevard is a six-lane north-south collector that extends from Serramonte Boulevard, terminating at Serramonte Center, south to Hickey Boulevard. It becomes a two- to four-lane road from Hickey Boulevard to Shannon Drive. Sidewalks are provided on both sides in the project area and bike lanes are provided south of Hickey Boulevard. The posted speed limit is 30 mph.

Junipero Serra Boulevard is a north-south arterial with two lanes in each direction of travel in the project area. Sidewalks are provided on both sides north of Serramonte Boulevard and on the east side between Serramonte Boulevard and Arlington Drive. Bike lanes on both sides are provided in the project area. The posted speed limit is 40 mph near the project site.

St. Francis Boulevard is a local two-lane road that extends from Eastmoor Avenue south to Hickey Boulevard, primarily serving residential land uses. Sidewalks and on-street parking are provided along the roadway. Bike lanes are provided north of Serramonte Boulevard. The posted speed limit is 25 mph.

Clarinada Avenue is an approximately 0.6-mile-long east-west local road connecting Higate Drive and Callan Boulevard. Two lanes of vehicle travel in each direction are provided east of the Highway 1 ramps and one travel lane in each direction to the west. On-street parking and sidewalks are provided along the entire road. The speed limit is not posted.

Transit Services

Existing transit service within the vicinity of the project site is provided by the San Mateo County Transit District (SamTrans) and Bay Area Rapid Transit (BART). Existing transit facilities in the area are shown on Figure 3.17-1.

SamTrans

Local transit service in the vicinity of the project site is provided by SamTrans, which operates 14 fixed bus routes in Daly City and a total of 82 routes in San Mateo County and the cities of San Francisco and Palo Alto. The project site is served by Routes 24, 49, 112, 120, and 121.

Route 24 runs service on school days from Brisbane to Colma to Summit Shasta High School in the morning, and the reverse route in the afternoon. The closest bus stop is located by the St. Francis Boulevard and Serramonte Boulevard intersection.

Route 49 runs service on school days from the Serramonte Center to Terra Nova High School in the morning, and the reverse route in the afternoon. The closest bus stop is by the Callan Boulevard and Serramonte Boulevard intersection.

Route 112 runs from the Linda Mar Park and Ride to the Colma BART station via Hickey Boulevard and Gellert Boulevard. It provides hourly service from 6:00 a.m. to 9:45 p.m. on weekdays, and from 7:55 a.m. to 8:45 p.m. on weekends. The closest bus stop is at the Callan Boulevard and Hickey Boulevard intersection.

Route 120 runs between the Daly City BART station to the north and Colma and South San Francisco BART stations to the South. It provides service from 4:05 a.m. to 11:45 p.m. with about 10-minute peak headways on weekdays and about 15-minute peak headways on weekends. The closest bus stop is at the Highway 1 and Serramonte Boulevard intersection.

Route 121 runs between Skyline College Transit Center to the intersection of Bellevue Avenue and Pope Street in Daly City via Hickey Boulevard and Gellert Boulevard, passing Serramonte Center and the Colma BART station. It provides hourly service from 6:25 a.m. to 10:40 p.m. on weekdays, from 7:25 a.m. to 10:40 p.m. on Saturdays, and from 7:25 a.m. to 9:00 p.m. on Sundays. The closest bus stop is by the Callan Boulevard and Serramonte Boulevard intersection.

SamTrans also provides paratransit service throughout San Mateo County. Daly City is served specifically by its Redi-Wheels on-demand service.

Bay Area Rapid Transit

Regional transit service is provided by BART. The closest BART station is the Colma BART station, located approximately 1.2 miles to the northeast of the project site. The South San Francisco BART station is located approximately 1.5 miles to the southeast of the project site. Both stations are served by the Red and Yellow lines. The Red Line runs from Richmond to Millbrae with service at 30-minute headways or less on weekdays and Saturdays. The Yellow Line runs from Antioch to the San Francisco International Airport (SFO) with at 30-minute headways or less every day of the week. As mentioned above, SamTrans routes 112, 120, and 121 connect to the Colma, Daly City, and SFO BART stations. SamTrans bus route 120 has stops in front of the Precise Plan area on Serramonte Boulevard and provides service to the Colma BART station with 10-minute headways during peak weekday and weekend hours.



Boundaries — PD31 Boundary — Project Boundary — Parcel Boundaries — Immediate Surrounding Neighborhoods

Transportation — Project Site Entry — SamTrans Bus Lines & Stops — Existing/In-progress Class II Bicycle Lane — Existing/In-progress Class III Bicycle Route

Source: Fehr & Peers, 2023.

EXISTING TRANSPORTATION FACILITIES

FIGURE 3.17-1

Bicycle Facilities

Bicycle facilities within the vicinity of the project site include Class II bike lanes and Class III bike routes. These facilities are discussed below, and shown on Figure 3.17-1 above.

Class II Bike Lanes

Bike lanes provide designated street space for bicyclists, typically adjacent to the outer vehicle travel lanes. Bike lanes include special lane markings, pavement legends, and signage. Existing and proposed bicycle facilities are described below. Bike lanes may be enhanced with painted buffers between vehicle lanes and/or parking, and green paint at conflict zones (such as driveways or intersections). Class II bicycle lanes are currently provided along:

- Callan Boulevard south of Serramonte Boulevard
- Serramonte Boulevard between Callan Boulevard and the south entrance to Serramonte Center
- Junipero Serra Boulevard between Amelia M Teglia Boulevard and Hickey Boulevard

Class III Bike Routes

Class III bikeways are shared bikeways where the cyclist occupies the same right-of-way with either motor vehicles or pedestrians. Signs are used to designate that the street or path also is to be used by cyclists. While this type of bikeway is least expensive to install, it is the most hazardous. Class III bikeways are currently provided along:

- Serramonte Boulevard west of Callan Boulevard and in the vicinity of Gellert Boulevard
- Hickey Boulevard
- Callan Boulevard between Southgate Avenue and Serramonte Boulevard

Pedestrian Facilities

Pedestrian facilities in the vicinity of the Precise Plan area include sidewalks, crosswalks, and pedestrian signals. All local, collector, and arterial roads provide crosswalks on at least one side of the roadway. All signalized intersections either provide a marked crosswalk, or, in the case of three-legged intersections, a continuing sidewalk on the missing approach. Sidewalks are provided on both sides of all nearby roadways, with the exception of Serramonte Boulevard between Callan Boulevard and south entrance to Serramonte Center and portions east of Gellert Boulevard, Junipero Serra Boulevard south of Serramonte Boulevard, and the majority of Hickey Boulevard east of Gellert Boulevard, which provide sidewalks on one side of the roadway.

Vehicle Miles Traveled

VMT was modeled using the C/CAG-VTA travel demand model, which covers the entire nine-county MTC region and provides information regarding the characteristics of home-based vehicle trips made by residents throughout the Bay Area. More information on the assumptions and methodology behind the modeling of existing VMT is provided in Appendix L. The C/CAG-VTA

travel demand model indicates that the average Bay Area VMT per resident is 14.6, and the countywide VMT per resident is 13.6.

3.17.1.3 *Methodology*

At the time of this report, the City of Daly City is undertaking a process of updating its significance thresholds to be consistent with SB 743, and the CEQA 2019 Update Guidelines Section 15064.3, subdivision (b). The City has not released draft significance thresholds to determine project VMT impacts. In the absence of an adopted City policy or draft numeric thresholds, this study utilized the OPR guidelines in analyzing VMT.

3.17.2 Impact Discussion

For the purpose of determining the significance of the project's impact on transportation, would the project:

- 1) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle lanes, and pedestrian facilities?
- 2) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?
- 3) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
- 4) Result in inadequate emergency access?

3.17.2.1 *Project Impacts*

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

The City of Daly City does not currently have an adopted VMT policy. Per SB 743, the City's LOS standards cannot be used in CEQA analysis for transportation impacts, although any physical improvements to the roadway system to maintain acceptable LOS must be evaluated as physical changes to the environment related to the project. A summary of the project's consistency with City LOS standards is discussed in Section 3.17.3 Non-CEQA, below. The project's VMT impact is discussed in Impact TRN-2.

Vehicles would access the project site through a northern access point at the intersection of Serramonte Boulevard and the Highway 1 on-ramps, or through a southern access point accessible from Hickey Boulevard via Campus Drive. The project proposes the following improvements to the Serramonte Boulevard/Highway 1 intersection:

- Installation of traffic signal
- Installation of high-visibility crosswalks on all four legs

- Installation of ADA compliant curb ramps and associated sidewalk improvements in the intersection's four corners
- Installation of Class II bike-lanes on the north and south sides of Serramonte Boulevard at the Highway 1 Ramps/Entry Drive intersection consistent with the concepts presented in Walk-Bike Daly City
- Restriping the eastbound approach to include dedicated left and shared through-right turn lanes
- Restriping the westbound approach to include a 200-foot-long left turn pocket into the project site and a shared through-right turn lane
- Restriping the southbound (off-ramp) approach to include dedicated left and shared through-right turn lanes
- Provision of a shared bike-lane/bus stop in the intersection's southwest corner
- Provision of a shared cycle track bus stop in the intersection's northwest corner, consistent with the concepts presented in Walk-Bike Daly City
- Elimination of the westbound left turn lane on Serramonte Boulevard into the removed property driveway across from Kent Court

Implementation of the improvements identified above would be considered an improvement to existing conditions as it would increase vehicle, bicycle, and pedestrian safety. In addition, all the improvements identified above would be constructed within the existing right-of-way and no expansion of roadways would be necessary. Limited tree trimming or removal would be required for some of the improvements; however, any street trees removed would be replaced in accordance with the City's Urban Forestry Ordinance (see Impact BIO-5 in Section 3.4 Biological Resources). Thus, the construction of these improvements would not result in any significant environmental impacts.

As shown in Figure 2.2-5, the Precise Plan's internal public roadway network would consist of Entry Drive, which would extend south to North Drive, which would branch off into East and West Drive, each of which would extend south to Campus Drive. Entry Drive would be a four-lane roadway, while all other drives would be two lanes. An intersection operations analysis was conducted for the internal roadways that concluded that all intersections and driveways would operate at LOS A or B, indicative of acceptable traffic operations (refer to Appendix L).

Transit Services

Implementation of the proposed project (including the Parcel A development project) would introduce 3,403 net new residents to the project site in comparison with planned development levels (refer to the discussion in Section 3.14.2.1 under Impact POP-1) and would generate approximately 170 new transit users.⁸⁴ It is not anticipated that the increase in transit users would exceed the capacity of existing bus and BART services within the project area.

As discussed under Section 3.17.1.1 Regulatory Framework above, SamTrans routes 24 and 120 operate along Serramonte Boulevard with stops located on both sides of Serramonte Boulevard. The

⁸⁴ Assumes five percent of residents use public transit. Source: U.S. Census Bureau. *Commuting by Public Transportation in the United States: 2019*. April 2021.

Parcel A Development project was recently completed and installed bus stop amenities, including improved sidewalks and a new bus shelter on Serramonte Boulevard. The project proposes to complete sidewalk corner improvements and install crosswalks at all four legs of the Serramonte Boulevard/Entry Drive/Highway 1 intersection, which would improve access to existing transit facilities. Beyond these improvements, the project does not propose any modifications to existing transit circulation system (roadways, sidewalks, etc.) that could conflict with existing or planned transit services.

Based on the above, the proposed project would not conflict with a program, plan, ordinance or policy regarding transit services.

Bicycle and Pedestrian Facilities

Planned improvements to the existing bicycle and pedestrian circulation systems are identified in the City's General Plan and Walk Bike Daly City (refer to Section 3.17.1.1 Regulatory Framework). Various General Plan policies and actions have been adopted to implement planned improvements and ensure that future developments do not impact existing and future bicycle and pedestrian facilities.

As discussed in Section 3.17.1.2 Existing Conditions, Class II and Class III bicycle facilities are located adjacent to the project site and within the project vicinity. The bicycle facilities within the vicinity of the project site would remain unchanged post-implementation of the project, and the project would not result in increases to cyclists that would exceed the carrying capacity of existing facilities. Consistent with General Plan Policies CE-13 and CE-20, the project proposes to provide Class I, Class II, and Class III bicycle facilities on interior roadways within the project site and Class II bicycle facilities along eastbound and westbound Serramonte Boulevard that would improve bicycle access to and from the site. Additionally, the project would be consistent with the City's bicycle parking requirements. As discussed under Impact TRN-3 below, implementation of MM TRN-3.2 would ensure that the proposed right-in right-out driveway on Serramonte Boulevard would allow bicycles to cross safely.

The project proposes to improve pedestrian facilities at the Serramonte Boulevard/Highway 1 intersection by installing high visibility crosswalks on all four approaches along with ADA compliant ramps and associated sidewalk improvements at all four corners. Otherwise, implementation of the project would leave pedestrian facilities adjacent and within the project vicinity unchanged. Consistent with General Plan Policies CE-13, CE-16, CE-20 and Tasks CE-16.9, CE-20.1, and CE-20.7, implementation of the project would provide sidewalks on both sides of all internal roadways and high-visibility crosswalks at all internal stop-controlled intersections, as well as on the three legs of the proposed roundabout, which would improve pedestrian access to and from the site. Implementation of MM TRN-3.2 would ensure that the proposed right-in right-out driveway on Serramonte Boulevard would allow pedestrians to cross safely.

Based on the above, the proposed project would not conflict with a program, plan, ordinance or policy regarding bicycle and/or pedestrian facilities. **(Less than Significant Impact)**

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

For purposes of this analysis, the City of Daly City is relying on the guidelines provided in OPR's Technical Advisory on Evaluating Transportation Impacts in CEQA (dated December 2018), and uses a threshold of 15 percent below the baseline regionwide (the nine-county San Francisco Bay Area) and countywide (San Mateo County) average home-based VMT per resident. As discussed in Section 3.17.1.2 Existing Conditions, the regionwide VMT per resident is 14.6, and the countywide VMT per resident is 13.6. As the significance threshold is 15 percent below these averages, the corresponding regionwide threshold is 12.4 VMT per resident, and the corresponding countywide threshold is 11.6 VMT per resident.

Consistent with OPR's Technical Advisory, since the retail component of the proposed project is expected to redistribute shopping trips rather than create new trips (i.e., people will drive to the closest retail store, thereby reducing VMT), the proposed retail uses are presumed to have a less than significant VMT impact.

The VMT generated by the residential component of the project was modeled using the same C/CAG-VMT travel demand model used to determine the VMT generated by the existing development. More information on the methodology used to determine the project's VMT impacts can be found in Appendix L of this EIR. The project's total VMT per resident (including the Parcel A development project), in comparison with the existing VMT per resident and the significant thresholds identified above, is shown below in Table 3.17-1.

Table 3.17-1: Precise Plan VMT per Resident				
Level of Analysis	Existing VMT per resident	Significance Threshold¹	Precise Plan VMT per resident	Significant Impact?²
Countywide	13.6	11.6	12.0	Yes
Regionwide	14.6	12.4	12.0	No
Notes: ¹ The significant threshold is 15 percent below the existing VMT per resident. ² Significant impacts shown in bold . Source: Fehr & Peers, Inc. <i>Transportation Impact Assessment for the Serramonte Del Rey Precise Plan</i> . July 2022.				

As shown above in Table 3.17-1, the residential component of the project is projected to generate 12 VMT per resident, which is below the regionwide significance threshold of 12.4 VMT per resident, but in excess of the countywide threshold of 11.6 VMT per resident.

Mitigation Measures:

MM TRN-2.1: Prior to issuance of building permits, the project applicant shall develop a transportation demand management (TDM) plan for the proposed project (except for the Parcel A development project which has already been occupied) in accordance with C/CAG's Transportation Demand Management Policy Implementation Guide, including any anticipated phasing, and shall submit the TDM Plan to the City for review and approval. The TDM Plan shall identify trip reduction strategies as well as mechanisms for funding and overseeing the delivery of trip reduction programs and strategies. The TDM Plan shall be designed to achieve the trip reduction, as required to reduce the VMT per resident from 12.0 to 11.6. The TDM Plan shall describe which measures apply to the entire site and which, if any, apply on a parcel-by-parcel basis.

Trip reduction strategies applicable to the proposed project may include, but are not limited to, the following:

- Provide Secure and Accessible Bike Parking
- Provide Bicycle Maintenance Facilities
- Price and Unbundle Parking
- Provide Carpooling Programs
- Implement Car-Sharing Program
- Implement Loaner Bike Program
- Provide a Transit Riders Guide
- Provide a Dedicated Transportation Coordinator
- Provide an Online TDM Information Center
- Free Trial Rides on Transit Services
- Implement a Subsidized or Discounted Transit Program

The TDM plan shall indicate the estimated Vehicle Trip Reduction (VTR) for each strategy proposed based on published research or guidelines. For TDM measures containing ongoing operational VTR strategies, the TDM plan shall include an ongoing monitoring and enforcement program to ensure the Plan is implemented on an ongoing basis during project operation. For VTR strategies involving physical improvements, the project shall obtain the necessary permits/approvals from the City and install the improvements prior to building occupancy. Applicant will resubmit TDM Plan if there is a material adverse impact resulting from a change from the permitted uses (i.e., unit count, use type, phasing).

The TDM Plan shall require annual evaluation of the program by the property owner, to determine if the program goals in reducing automobile travel are satisfied and to assess the effectiveness of the various strategies implemented. The property owner shall be required to conduct biennial self-certification for the

first six years of project occupancy per the C/CAG TDM Program. The property owner shall conduct annual travel surveys and driveway counts to monitor the amount of automobile travel generated by the project. The goal of the TDM Plan and programs shall be to reduce the project's daily VMT per resident from 12.0 to 11.6. Based on the results of the surveys, the TDM programs shall be increased if these requirements are not met. Annual travel surveys and driveway counts (TDM program monitoring) shall be conducted for the first two years following project occupancy. The results of the monitoring program and travel surveys shall be submitted to the City for review and approval. If the program VMT reduction goals are met in the first six years, annual monitoring and surveys shall be suspended. If the program's VMT reduction goals are not satisfied, site management shall prepare and submit for City approval a Corrective Action Plan. The Corrective Action Plan shall detail the additional TDM measures to be implemented on site and their expected travel/mode split reduction. Additional annual travel surveys and driveway counts shall be conducted for the two years following the implementation of the Corrective Action Plan to determine if the program's VMT reduction goals are satisfied.

Based on current literature regarding project-level TDM strategies, implementation of MM TRN-2.1 would result in an approximately 20 percent reduction in the project's VMT per resident.⁸⁵ Thus the project's VMT per resident would be reduced from 12 to 10.8 VMT per resident, which is below the countywide significance threshold of 11.6 VMT per resident. Therefore, with implementation of MM TRN-2.1, the project would be consistent with CEQA Guidelines Section 15064.3(b). **(Less than Significant Impact with Mitigation Incorporated)**

Impact TRN-3:	The project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). (Less than Significant Impact with Mitigation Incorporated)
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Construction Traffic

Buildout of the project would be phased and occur over the course of eight to 15 years. Construction staging and worker parking would occur on-site, and construction trucks would access the site via the northern and southern access points. The presence of construction truck and worker vehicle traffic on-site concurrent with operation of existing and adjacent uses could create potential safety conflicts with public transit, vehicles, bicycle, and pedestrian traffic.

Mitigation Measures:

MM TRN-3.1: A Construction Traffic Management Plan shall be developed and implemented to minimize impacts to the transportation system. The Construction Traffic Management Plan shall detail the Project's construction schedule, vehicle type time-of-day plans, route planning, advanced public notices of partial or full street

⁸⁵ Fehr & Peers. *Transportation Impact Assessment Serramonte Del Rey Precise Plan*. July 2022. Pages 37-38.

closures or traffic diversion, and other strategies to reduce potential conflicts during construction. The plan shall include, but not be limited to, the following:

- Identification of the traffic controls and methods proposed during each phase of Project construction. Provision of safe and adequate access for vehicles, transit, bicycles, and pedestrians. Traffic controls and methods employed during construction shall be in accordance with Daly City standards and the requirements of the California Manual of Uniform Traffic Control Devices (CA MUTCD 2014, Revision 6).
- Provision of notice to relevant emergency services, thereby avoiding interference with adopted emergency plans, emergency vehicle access, or emergency evacuation plans.
- A prohibition on all construction truck activity during the weekday morning and evening peak commute periods (7:00 a.m. to 9:00 a.m. and 4:00 p.m. to 6:00 p.m.).
- Preservation of emergency vehicle access.
- Identification of approved truck routes in communication with Daly City staff.
- Location of staging areas and the location of construction worker parking.
- Identification of the means and locations of the separation (i.e. fencing) of construction areas and adjacent active uses.
- The provision of flaggers at all on-site locations where construction trucks and construction worker vehicles conflict with vehicle, bicycle, transit, or pedestrian traffic.
- Provision of a point of contact for residents to obtain construction information, have questions answered and convey complaints.

With implementation of MM TRN-3.1, safety conflicts between construction traffic and public transit, vehicles, bicycle, and pedestrian traffic would be reduced to a less than significant level.

Geometric Design

As discussed under Impact TRN-1, vehicles would access the project site through a northern access point at the intersection of Serramonte Boulevard and the Highway 1 on-ramps, or through a southern access point accessible from Hickey Boulevard via Campus Drive. The project would also include a right-in/right-out driveway onto Serramonte Boulevard approximately 200 feet east of Entry Drive; this driveway would provide access to the Parcel B garage. Since the driveway to the Parcel B garage as designed would be unsignalized, it could potentially conflict with vehicle, bicycle, and pedestrian traffic on Serramonte Boulevard.

Mitigation Measure:

MM TRN-3.2: As part of the Parcel B Development project's final design, details of the Serramonte Boulevard parking garage driveway design would include the following as determined necessary by the City Traffic Engineer:

- Measures to prohibit vehicular left-turns – either through the installation of a hard concrete median, vertical delineators, or alternative means.
- Adequate sight distance – obstructions to sight distance for all users should not be placed adjacent to the driveway and adequate throat distance to the garage entry should be provided accordingly.
- Pedestrian and bicycle warning measures – adequate warning measures for pedestrians and bicycles should be provided on Serramonte Boulevard, including the installation of tactile domes on the sidewalk and green hatched bike lane striping on the roadway.
- The Parcel B driveway along Serramonte Blvd. shall provide satisfactory separation distance from the intersection of Serramonte Blvd. and Highway 1 on- and off-ramps to address merging and any turning movements.
- A separate traffic study shall be conducted to determine if a new traffic signal at the Parcel B driveway is warranted. The results of the study will affect the City's determination on whether a driveway entry and exit shall be permitted along Serramonte Blvd.

Implementation of MM TRN-3.2 would ensure that vehicles exiting the driveway would have adequate sight distance and would not be able to make illegal left-turns which could create hazards for other vehicles, bicycles, and pedestrians. Additionally, MM TRN-3.2 would alert vehicles entering and exiting the driveway of the presence of bicycles and pedestrians. As such, implementation of MM TRN-3.2 would ensure that the proposed driveway does not substantially increase hazards.

The project also proposes to construct residential buildings that would each have their own gated parking garages, which residents would be able to access through the use of a keycard or equivalent technology. Queues at these parking garages could conflict with bicycle and pedestrian facilities if not designed properly.

Mitigation Measure:

MM TRN-3.3: As part of the project's final design, each residential facility's garage entrance accessed via the public right of way shall be designed to provide adequate storage for expected vehicle queues. The amount of storage shall be calculated based on the individual garage size and forecast rates of arrival and departure. A minimum stacking distance of 25 feet shall be provided between the back of curb and gate installation at the entrance to each residential garage entrance. The purpose of this space is to minimize the instance of vehicles queued across sidewalks and bicycle facilities. These queue calculations shall be performed for each garage and

submitted to the City Engineer with planning/building permit for review and approval.

Implementation of MM TRN-3.3 would ensure that entrances with adequate storage capacity are provided at each residential garage, which in turn would prevent vehicle queuing backing up into bicycle and pedestrian facilities. Accordingly, with implementation of MM TRN-3.3, the proposed residential garages would not increase hazards.

Incompatible Land Uses

Implementation of the project would redevelop the project site with residential and commercial uses. As shown on Figure 2.2-3, residential uses are present to the south, west, and north, and commercial uses are present to the northeast. Therefore, the Precise Plan does not propose any uses incompatible with the surrounding area that could result in increased hazards. **(Less than Significant Impact with Mitigation Incorporated)**

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

Emergency vehicles would access the project site via the northern access point at the intersection of Serramonte Boulevard and the Highway 1 on-ramps, or via the southern access point accessible from Hickey Boulevard via Campus Drive. The northern access point would provide two travel lanes in each direction, while the southern access point would provide one travel lane in each direction. In order to ensure that emergency vehicles have adequate access to and within the project site, the project would be required to implement the following mitigation measures.

Mitigation Measure:

MM TRN-4.1: In accordance with City and North County Fire Authority requirements and design standards, all future development within the project site shall provide even surface pavement, appropriate signage, delineation, and other features at all emergency access points and internal roadways to accommodate emergency vehicles. As part of the final design and permitting process, each proposed development shall seek and obtain approval from the North County Fire Authority.

Implementation of MM TRN-4.1 would ensure that the streets used by emergency vehicles to access the Precise Plan area are in good condition and facilitate the safe and efficient movement of emergency vehicles. As part of the review process, the North County Fire Authority would confirm that adequate emergency vehicle access is provided to each parcel and individual building within the Precise Plan area. **(Less than Significant Impact with Mitigation Incorporated)**

3.17.2.2 Cumulative Impacts

Impact TRN-C: The project would not result in a cumulatively considerable contribution to a cumulatively significant transportation impact. **(Less than Significant Cumulative Impact with Mitigation Incorporated)**

The current General Plan and 1985 Precise Plan allow up to 175 residential units and approximately 700,000 square feet of office space within the boundaries of the Precise Plan. The daily trip generation for this amount of development would be approximately 8,099 daily trips.⁸⁶ In comparison, the proposed project would generate approximately 8,433 net new trips, which results in a difference of 334 additional trips. Therefore, the project would result in a greater VMT than what is expected for the project site under the current General Plan. However, as discussed under Impact TRN-2 above, the project's VMT per resident would be reduced from 12 to 10.8 VMT per resident with implementation of MM TRN-2.1, which is below the countywide significance threshold of 11.6 VMT per resident. Therefore, the project would not have a cumulatively considerable contribution to a significant cumulative VMT impact.

The projects listed under Table 3.0-1 would be required to comply with state, regional, and local regulations addressing safe project design, emergency access, and roadway, transit, bicycle, and pedestrian facilities. Therefore, the projects would not combine to form a significant cumulative transportation impact. **(Less than Significant Cumulative Impact with Mitigation Incorporated)**

3.17.3 Non-CEQA Effects

With the advent of SB 743 (refer to Section 3.17.1.1 Regulatory Framework), the effect of a project on automobile delay is no longer considered an impact on the environment. Nonetheless, local agencies retain their right to assess and regulate a project's impact on the circulation system outside of the CEQA process. In accordance with General Plan Policy CE-1.3 and the County's CMP, the TIA prepared by Fehr & Peers (refer to Appendix L) included an analysis of non-CEQA transportation issues, including intersection operations and parking.

Intersection Operations

Pursuant to the City of Daly City General Plan's Circulation Element, a project is considered to violate the City's LOS policy when the addition of project traffic degrades an existing intersection's operation from acceptable LOS (D or better) to unacceptable LOS (E or F), or adds substantial traffic to intersections already operating at LOS E or F. In the event a project causes an LOS deficiency, the City has discretion whether to require a project to address the deficiency by implementing roadway or other transportation improvements to restore or improve the level of service, and the relevant question under CEQA now that LOS degradation is not considered an environmental impact is whether those improvements would result in adverse physical changes to the environment, not whether LOS has degraded below the condition considered acceptable.

⁸⁶ Multifamily Housing Units (Land Use Code 220): 175 dwelling units x 7.32 = 1,281 daily trips. General Office (Land Use Code 710): 700,000 square feet/1,000 x 9.74 = 6,818 daily trips. Total daily trips = 8,099. Source: Institute of Transportation Engineers. *Trip Generation Manual (10th Edition)*. 2017.

In accordance with standard City practice and methodology, the project's effect on LOS was analyzed at the following 15 intersections during the weekday morning (7:00 a.m. to 9:00 a.m.) and evening (4:00 p.m. to 6:00 p.m.) peak periods:

- Highway 1 Ramps/Clarinada Avenue
- Callan Boulevard/Clarinada Avenue
- St. Francis Boulevard/Serramonte Boulevard
- Highway 1 Ramps-Project Driveway/Serramonte Boulevard
- Callan Boulevard/Serramonte Boulevard (Signalized)
- Gellert Boulevard/Serramonte Boulevard (Signalized)
- I-280 Southbound Ramps/Serramonte Boulevard (Signalized)
- I-280 Northbound Ramps/Serramonte Boulevard (Signalized)
- Junipero Serra Boulevard/Serramonte Boulevard (Signalized)
- Skyline Boulevard/Hickey Boulevard (Signalized)
- Hickey Boulevard/Campus Drive (Signalized)
- Callan Boulevard/Hickey Boulevard (Signalized)
- Gellert Boulevard/Hickey Boulevard (Signalized)
- I-280 Southbound Ramps/Hickey Boulevard (Signalized)
- I-280 Northbound Ramps/Hickey Boulevard (Signalized)

Trip Generation

The number of vehicle trips that would be generated by the project were estimated using trip generation rates from the Institute of Transportation Engineers (ITE) *Trip Generation Manual, 10th Edition*. Project trip generation estimates are presented in Table 3.17-2 below.

Table 3.17-2: Summary of Project Trip Generation							
Land Use	Daily Trips	AM Peak Hour			PM Peak Hour		
		In	Out	Total	In	Out	Total
Multifamily Housing (1,113 dwelling units) ¹	8,147	118	394	512	393	231	624
Retail (14,000 square feet) ²	529	8	5	13	26	28	54
Mixed-Use Reduction (15 percent) ³	-79	-1	-1	-2	-4	-4	-8
Subtotal Project Trips	8,597	125	398	523	415	255	670
Existing Trips ⁴	-1,053	-115	-78	-193	-71	-108	-179
Parcel A Development Project (122 dwelling units)	889	12	80	92	53	13	69

Table 3.17-2: Summary of Project Trip Generation							
Land Use	Daily Trips	AM Peak Hour			PM Peak Hour		
		In	Out	Total	In	Out	Total
Total Net New Trips	8,433	22	400	422	399	160	559
Notes: ¹ Multifamily Housing (ITE Land Use Code 220) Daily Rate: 7.32; AM rate: 0.46 (23% in/77% out); PM rate: 0.56 (63% in/37% out) ² Shopping Center (ITE Land Use Code 820) Daily Rate: 37.75; AM rate: 0.94 (62% in/38% out); PM rate: 3.81 (48% in/52% out) ³ Internal Trip Capture – 15% of Retail Trips Associated with Residential Users (ITE Trip Generation Handbook, 3rd Edition) ⁴ Based on existing driveway counts and trip generation estimates of existing uses to be removed. Source: Fehr & Peers. <i>Transportation Impact Assessment for the Serramonte Del Rey Precise Plan</i>. July 2022.							

Extensive detail about the Non-CEQA LOS analysis, including methodology, trip distribution, trip assignment, and City standards is included in Appendix L.

Existing and Existing Plus Project Conditions

Under existing plus project (full Precise Plan buildout) conditions, three intersections would violate the City's LOS policy (see Table 3.17-3 below). All other intersections would operate at acceptable levels (see Appendix L for additional intersection calculations).

Table 3.17-3: Existing Plus Project Intersection LOS at Adversely Affected Intersections					
Intersection	Peak Hour ¹	Existing		Existing Plus Project	
		Delay ²	LOS	Delay ²	LOS
Highway 1/Clarinada Avenue*	AM	13.2	B	14.2	B
	PM	41.4	E	<u>45.9</u>	<u>E</u>
Highway 1/Serramonte Boulevard*	AM	24.6	C	<u>45.3</u>	<u>E</u>
	PM	19.2	<u>C</u>	<u>58.8</u>	<u>F</u>
Callan Boulevard/Hickey Boulevard	AM	24.9	C	25.1	C
	PM	54.5	D	<u>63.4</u>	<u>E</u>
Notes: ¹ AM = Weekday morning peak hour (7:00-9:00 a.m.); PM = Weekday afternoon peak hour (4:00-6:00 p.m.) ² Whole intersection average delay reported for signalized and all-way stop controlled intersections. Delay calculated per HCM 6th methodologies. Bolded text indicates unacceptable operations pursuant to City standards. Bolded and underlined text indicates Project-related policy violation. * Indicates an unsignalized intersection. Source: Fehr & Peers. <i>Transportation Impact Assessment for the Serramonte Del Rey Precise Plan</i>. July 2022.					

The following improvements would reduce project-related violations of the City's LOS policy under existing plus project conditions and could be accommodated within the existing right-of-way. In addition, the following improvements would be required to implement all construction-related standard permit conditions, conditions of approval, and mitigation measures identified in this EIR. Thus, construction of the improvements would have a less than significant impact on the environment.

Highway 1/Clarinda Avenue Improvement: Installation of a traffic signal is currently warranted at this intersection prior to the addition of any project traffic (including Parcel A traffic). The addition of project traffic would increase delay at this location while functioning at LOS E. The installation of a traffic signal at this location would result in acceptable operations (LOS A during both the morning and evening peak hours).

Highway 1/Serramonte Boulevard Improvement: Installation of a traffic signal is currently warranted at this intersection prior to the addition of any project traffic (including Parcel A traffic). While current volumes meet signal warrants, the intersection functions at an acceptable level of service prior to the addition of project traffic (LOS C in the AM and PM peak hours). The addition of project traffic would increase delay at this location and result in the level of service deteriorating to LOS E and F during the morning and evening peak hours, respectively. The installation of a traffic signal at this location would result in acceptable operations (LOS B during both the morning and evening peak hours).

Callan Boulevard/Hickey Boulevard Improvement: Stripe an exclusive westbound right-turn lane on the Hickey Boulevard approach to Callan Boulevard. This modification would be accomplished within the existing roadway cross section through the elimination of on-street parking for approximately 200 feet approaching the intersection. This modification would result in acceptable intersection operations within the City's LOS policy during the affected PM peak hour.

Cumulative and Cumulative Plus Project Conditions

Under cumulative plus project conditions, seven intersections would violate the City's LOS policy (see Table 3.17-4 below). All other intersections would operate at acceptable levels (see Appendix L for additional intersection calculations).

Table 3.17-4: Cumulative Plus Project Intersection LOS at Adversely Affected Intersections					
Intersection	Peak Hour¹	Cumulative		Cumulative Plus Project	
		Delay²	LOS	Delay²	LOS
Highway 1/Clarinda Avenue*	AM	18.0	C	21.8	C
	PM	60.3	F	<u>72.1</u>	<u>F</u>
Callan Boulevard/Clarinda Avenue*	AM	21.7	C	24.3	C
	PM	69.6	F	<u>86.7</u>	<u>F</u>
Highway 1/Serramonte Boulevard*	AM	49.6	E	<u>115.0</u>	<u>F</u>
	PM	56.1	F	<u>129.6</u>	<u>F</u>

Table 3.17-4: Cumulative Plus Project Intersection LOS at Adversely Affected Intersections					
Intersection	Peak Hour¹	Cumulative		Cumulative Plus Project	
		Delay²	LOS	Delay²	LOS
Gellert Boulevard/ Serramonte Boulevard	AM	17.0	B	17.8	B
	PM	53.1	D	<u>69.2</u>	<u>E</u>
Junipero Serra Boulevard/ Serramonte Boulevard	AM	35.4	D	36.9	D
	PM	87.5	F	<u>88.1</u>	<u>F</u>
Skyline Boulevard/ Hickey Boulevard	AM	32.8	C	45.5	D
	PM	77.9	E	<u>85.5</u>	<u>F</u>
Callan Boulevard/Hickey Boulevard	AM	38.5	D	38.5	D
	PM	112.9	F	<u>129.5</u>	<u>F</u>
Notes: ¹ AM = Weekday morning peak hour (7:00-9:00 a.m.); PM = Weekday afternoon peak hour (4:00-6:00 p.m.) ² Whole intersection average delay reported for signalized and all-way stop controlled intersections. Delay calculated per HCM 6th methodologies. Bolded text indicates unacceptable operations pursuant to City standards. Bolded and underlined text indicates Project-related policy violation. * Indicates an unsignalized intersection. Source: Fehr & Peers. <i>Transportation Impact Assessment for the Serramonte Del Rey Precise Plan</i>. July 2022.					

The following improvements would reduce project-related violations of the City's LOS policy under cumulative plus project conditions and could be accommodated within the existing right-of-way. In addition, the following improvements would be required to implement all construction-related standard permit conditions, conditions of approval, and mitigation measures identified in this EIR. Thus, construction of the improvements would have a less than significant impact on the environment.

Highway 1/Clarinada Avenue Improvement: Installation of a traffic signal. This improvement was identified as a remedy for existing plus Project conditions; it would also eliminate the Cumulative plus Project violation of the City's LOS policies. The addition of project traffic to cumulative conditions would increase delay at this location while functioning at LOS F. The installation of a traffic signal at this location would result in acceptable operations (LOS B or better during both the morning and evening peak hours).

Highway 1/Serramonte Boulevard Improvement: Installation of a traffic signal. This improvement was identified as a remedy for Existing plus Project conditions; it would also eliminate the Cumulative plus Project violation of the City's LOS policies. The addition of project traffic to cumulative conditions would increase delay at this location while functioning at LOS F in the PM peak hour and a degradation from LOS D to E in the AM peak hour. The installation of a traffic signal at this location would result in acceptable operations (LOS B under Existing plus Project conditions and LOS C under Cumulative plus Project conditions during both the morning and evening peak hours).

Callan Boulevard/Clarinada Avenue Improvement: Installation of a traffic signal would be warranted at this intersection under cumulative conditions prior to the addition of project traffic. The addition of project traffic to the cumulative scenario would increase delay at this location while functioning at LOS F during the PM peak hour. The installation of a traffic signal at this location would result in acceptable operations (LOS B during both the morning and evening peak hours) under Cumulative plus Project conditions.

Gellert Boulevard/Serramonte Boulevard Improvement: Optimize the intersection's traffic signal timing by increasing the cycle length to 120 seconds and optimizing splits to provide more time to the EB and WB approaches. This modification would improve the intersection's operation to better than pre-project levels in the cumulative condition during the PM peak hour where the policy violation was identified.

Junipero Serra Boulevard/Serramonte Boulevard Improvement: Optimize the intersection's traffic signal timing by increasing the cycle length to 130 seconds and optimizing splits to provide more time to all approaches. This modification would improve the intersection's operation to better than pre-project levels in the cumulative condition during the PM peak hour where the policy violation was identified.

Skyline Boulevard/Hickey Boulevard Improvement: Optimize the intersection's traffic signal timing by increasing the cycle length to 130 seconds and optimizing splits to provide more time to all approaches. This modification would improve the intersection's operation to better than pre-project levels in the cumulative condition during the PM peak hour where the policy violation was identified.

Callan Boulevard/Hickey Boulevard Improvement: Stripe an exclusive westbound right turn lane on the Hickey Boulevard approach to Callan Boulevard. This modification would be accomplished within the existing roadway cross section through the elimination of on-street parking for approximately 200 feet approaching the intersection. This improvement was identified as a remedy for Existing plus Project conditions. This modification would improve the intersection's operation to better than pre-project levels in the cumulative condition during the PM peak hour where the policy violation was identified. Optimize the intersection's traffic signal timing by shortening the cycle length to 120 seconds and optimizing splits. This modification would improve the intersection's operation to better than pre-project levels in the cumulative condition during the PM peak hour where the policy violation was identified.

Parking

Pursuant to Daly City Municipal Code Section 17.34.020, the City requires one parking space per studio/junior one-bedroom unit, 1.5 spaces per one-bedroom unit, two spaces for every unit with two bedrooms or more, and one parking space per 300 square feet of retail space, which equates to a City code requirement of 2,052 residential spaces and 47 retail spaces.⁸⁷ The proposed project would construct a total of 1,853 residential spaces and 70 retail spaces, which would be 199 parking spaces below the minimum number of Code required residential parking spaces.

⁸⁷ Buildout of the project is assumed to have a unit mix of 188 studio/junior one-bedroom units, 461 one-bedroom units, 586 two-bedroom units, and 14,000 square feet of retail space.

The project's residential parking requirements were also calculated using The Institute of Transportation Engineer's (ITE) Parking Generation Manual, 5th Edition. ITE uses a rate of 1.23 and 1.37 parking spaces per low- to mid-rise apartments and high-rise apartments, respectively.⁸⁸ Based on these generation rates, the project would generate a residential parking demand of 1,519 to 1,692 spaces. As discussed above, the proposed project would provide 1,853 residential parking spaces, which would exceed the ITE generation rates.

⁸⁸ Institute of Transportation Engineer's. *Parking Generation Manual, 5th Edition*. 2018.

3.18 TRIBAL CULTURAL RESOURCES

The following discussion is based, in part, on a Cultural Resources Study prepared for the project by Tom Origer & Associates, dated February 26, 2021. A copy of this report is on file at the City of Daly City Planning Division.

3.18.1 Environmental Setting

3.18.1.1 *Regulatory Framework*

State

Senate Bill 18

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

Assembly Bill 52

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

Under AB 52, TCRs are defined as follows:

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

3.18.1.2 *Existing Conditions*

As discussed in Section 3.5 Cultural Resources, based on a site-specific records search and literature review, there are no known archaeological sites on the project site or nearby. The NAHC was contacted on December 29, 2020 to conduct a Sacred Lands File search. On January 19, 2021, the NAHC responded and determined there were no known sacred lands on the project site or within the project area. The NAHC provided a list of five Native American organizations to reach out to for additional information. These organizations were contacted on December 29, 2020 and February 25, 2021. No responses were received from any of the organizations.

On June 30, 2021, the City sent out notifications to the Amah Mutsun Tribal Band of Mission San Juan Bautista, Costanoan Rumsen Carmel Tribe, Indian Canyon Mutsun Band of Costanoan, Muwekma Ohlone Indian Tribe of the San Francisco Bay Area, and Ohlone Indian Tribe per SB 18 and AB 52. No responses were received from any of the tribes within 90 days of notice; therefore, tribal consultation was determined to be concluded as of September 28, 2021.

3.18.2 Impact Discussion

For the purpose of determining the significance of the project's impact on tribal cultural resources, would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- 1) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?
- 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.

3.18.2.1 *Project Impacts*

Impact TCR-1:	The project would not cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k). (Less than Significant Impact with Mitigation Incorporated)
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As documented under Section 3.18.1.2 Existing Conditions, there are no known TCRs within the Precise Plan area. As discussed in Section 3.5 Cultural Resources, the project site has a moderate potential to encounter subsurface tribal cultural resources. Construction-related ground disturbing activities could result in a significant impact to such resources if encountered. In the event that an inadvertent discovery of a tribal cultural resource is made, mitigation measures MM CUL-2.1, MM CUL-2.2, and MM CUL-3.1 would be implemented. Implementation of these mitigation measures would ensure that any subsurface tribal cultural resources encountered during construction are appropriately treated and protected. **(Less than Significant Impact with Mitigation Incorporated)**

Impact TCR-2: The project would not cause a substantial adverse change in the significance of a tribal cultural resource that is determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. **(Less than Significant Impact with Mitigation Incorporated)**

See response to Impact TCR-1 above. **(Less than Significant Impact with Mitigation Incorporated)**

3.18.2.2 *Cumulative Impacts*

Impact TCR-C: The project would not result in a cumulatively considerable contribution to a cumulatively significant tribal cultural resources impact. **(Less than Significant Cumulative Impact with Mitigation Incorporated)**

As discussed under Impact TCR-1, there are no known TCRs on the project site. In the event an unknown TCR is discovered, the mitigation measures identified in Section 3.5 Cultural Resources would reduce impacts to a less than significant level. The projects listed under Table 3.0-1 would be required to comply with state, regional, and local regulations addressing TCRs. Therefore, the projects would not combine to form a significant cumulative tribal cultural resources impact. **(Less than Significant Cumulative Impact with Mitigation Incorporated)**

3.19 UTILITIES AND SERVICE SYSTEMS

The following discussion is based, in part, on a Water Supply Assessment (WSA) and hydraulic analysis prepared by Brown and Caldwell, dated December 2021 and September 2021, and a sanitary sewer capacity evaluation memo prepared by Woodard & Curran, dated October 2021. Copies of these reports are attached to this EIR as Appendix M, Appendix N, and Appendix O respectively.

3.19.1 Environmental Setting

3.19.1.1 *Regulatory Framework*

State

State Water Code

Pursuant to the State Water Code, water suppliers providing water for municipal purposes to more than 3,000 customers or supplying more than 3,000 acre-feet (approximately 980 million gallons) of water annually must prepare and adopt an urban water management plan (UWMP) and update it every five years. As part of a UWMP, water agencies are required to evaluate and describe their water resource supplies and projected needs over a 20-year planning horizon, water conservation, water service reliability, water recycling, opportunities for water transfers, and contingency plans for drought events. The City of Daly City adopted its most recent UWMP in June 2021.

Senate Bill 610

SB 610 amended state law, effective January 1, 2002, to improve the link between information on water supply availability and certain land use decisions made by cities and counties. SB 610 requires preparation of a WSA containing detailed information regarding water availability to be provided to the decision-makers prior to approval of specified large development projects that also require a General Plan Amendment. This WSA must be included in the administrative record that serves as the evidentiary basis for an approval action by the city or county on such projects. Under SB 610, WSAs must be furnished to local governments for inclusion in any environmental documentation for certain projects subject to CEQA. Pursuant to the California Water Code (Section 10912[a]), projects that require a WSA include any of the following:

- A proposed residential development of more than 500 dwelling units;
- A proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space;
- A proposed commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space;
- A proposed hotel or motel, or both, having more than 500 rooms;
- A proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area;
- A mixed-use project that includes one or more of the projects identified in this list; or
- A project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500 dwelling unit project.

Assembly Bill 939

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

Assembly Bill 341

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

Senate Bill 1383

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

California Green Building Standards Code

The California Green Building Standards Code (CALGreen) establishes 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 50 percent of nonhazardous construction and demolition debris; and
- Providing readily accessible areas for recycling by occupants.

Local

City of Daly City General Plan

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

Policy/Task	Description
Policy RME-1	Reduce average per capita demand by implementing cost effective water conservation programs that address all applicable methods of water conservation.
Task RME-1.1	Enforce the provisions of the Indoor Water Use Efficiency Ordinance through an extensive public outreach campaign to residents and contractors, to be completed by 2014.
Policy RME-2	Require drought resistant landscaping and water conserving irrigation methods in new development, and encourage the replacement of existing water-intensive landscaping.
Task RME-2.1	Enforce the provisions of the Water Conservation in Landscaping Ordinance and conduct a public education effort to ensure that residents, businesses, and contractors are aware of the Ordinance provisions.
Policy RME-3	Continue to use recycled wastewater for irrigating and explore opportunities to expand capacity to accommodate its use in development projects, landscaped medians, golf courses, cemeteries, parks, and school playgrounds.
Policy RME-4	For development projects which will create water demand exceeding a pre-defined amount, require that developers provide a water supply analysis for the project to demonstrate water availability to adequately serve the proposed project.
Task RME-4.1	Develop a water supply questionnaire for inclusion with any application involving 50 or more residential units, 50,000 square feet or commercial or industrial development, or other pre-defined development intensity that constitutes a significance threshold under CEQA.
Policy RME-8	Through the development of a Stormwater Management Program, ensure that all new development complies with applicable municipal stormwater Municipal Regional Stormwater NPDES Permit by incorporating controls that reduce water quality impacts over the life of the project in way that is both technically and economically feasible, and reduces pollutants in stormwater discharges to the maximum extent practicable.
Task RME-8.2	Evaluate acceptable development standards for stormwater treatment mechanisms and publish such standards for distribution to developers. Such standards shall be based on a thorough evaluation of modern stormwater control mechanisms and shall, to the extent feasible, consider soil conditions in various parts of Daly City.
Task RME-8.4	Assess projected stormwater impacts from new development in conformance with the San Mateo County Water Pollution Prevention Program, CEQA Guidelines and relative to state and federal standards.
Policy RME-9	Balance stormwater mitigation measures with the other inherent benefits of higher density development that is in close proximity to public transit, i.e., reduction of Vehicle Miles Traveled (VMT) on local and regional roadways, to the extent permitted under the Municipal Regional Stormwater Permit.
Policy IN-3.7	Design new projects to minimize potential damage due to stormwaters and flooding to the site and other properties.

Daly City 2020 Urban Water Management Plan

The Urban Water Management Plan (UWMP) is a long-range plan that assesses the city's water supply over a 25-year planning horizon (2045) to ensure adequate water supplies to meet existing and future demands for water. The UWMP presents forecasted supplies and demands, describes conservation programs, and includes a water shortage contingency analysis.

Daly City Municipal Code

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

Chapter 15.64, Recycling and Diversion of Construction and Demolition Debris establishes that sixty percent of waste tonnage from construction, demolition, and alteration projects shall be diverted from disposal. This may be accomplished by delivering mixed debris to a recycling facility approved by the city, separating recyclables at the job site and delivering them to reuse and recycling facilities approved by the city, and/or reusing concrete or other waste materials at the jobsite. All new construction projects greater than twenty-five thousand dollars and all complete demolition projects within the city shall comply with the provisions of this chapter.

Daly City Sewer System Management Plan

The purpose of the Sewer System Management Plan (SSMP) is to provide guidance to the City in the operation, maintenance, and rehabilitation of the sewer assets of the City of Daly City. The SSMP includes construction standards and specifications for the installation and repair of the collection system and its associated infrastructure.

3.19.1.2 *Existing Conditions*

Water Service and Supply

Water service to the project site is provided by the Daly City Department of Water and Wastewater Resources (DWW). The City relies on local groundwater pumping from five municipal wells, which extracts groundwater from the Westside Groundwater Basin, and water supply purchases from the San Francisco Public Utilities Commission (SFPUC).⁸⁹ The City also uses tertiary recycled water from the North San Mateo County Sanitation District wastewater treatment plant, to offset potable/aquifer water demands. Currently recycled water is used to water five golf courses, two city parks, and road median strips. Recycled water is not a source of water proposed for the project site.

⁸⁹ Brown and Caldwell. *Daly City 2020 Urban Water Management Plan*. June 2021. Page 6-8.

The project site is currently served by a six-inch water main in Serramonte Boulevard and a 10-inch water main in at the northern terminus of Campus Drive and running north through the project site. The project site used approximately 33,000 gallons per day (gpd) of water in 2020.⁹⁰

Sanitary Sewer/Wastewater Treatment

Sanitary sewer lines in the project area are inspected and maintained by the City of Daly City Department of Water and Wastewater Resources. A 10-inch sanitary sewer line is located in Serramonte Boulevard. Wastewater collection and treatment for Daly City is managed by the North San Mateo County Sanitation District (NSMCSD), which is a subsidiary of the City of Daly City. Wastewater produced within the District is treated at the NSMCSD Treatment Plant (WWTP), which is located at the corner of John Daly Boulevard and Lake Merced Boulevard.

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

The project site currently generates approximately 28,050 gpd of wastewater.⁹¹

Storm Drainage

As discussed in Section 3.10 Hydrology and Water Quality, the project site is located within the Colma Creek Watershed which extends from San Bruno Mountain to its outlet at the San Francisco Bay just north of the San Francisco Airport and south of Point San Bruno. The northwest portion of the project has been developed with the approved Parcel A Development project (JUHSF Faculty and Staff Housing project). The northeast corner of the project site (Parcel B) is currently developed with a surface parking lot and portable building units. The southwest corner of the project site is developed with the JUHSF demonstration garden. The remainder of the project site is developed with surface parking lots and buildings. Surface runoff from the project site is collected in area drains and conveyed to a 24-inch storm drain in Serramonte Boulevard that flows to the east.

Solid Waste

Solid waste is collected from Daly City homes and businesses and is processed by Republic Services of Daly City and transferred to the Ox Mountain Sanitary Landfill near Half Moon Bay. In 2001, Browning-Ferris Industries, owner of the Ox Mountain Landfill, obtained a revised solid waste facility permit for Ox Mountain to increase the permitted disposal acreage from 173 acres to 191 acres. According to CalRecycle, the landfill has a remaining capacity of 22,180,000 cubic yards and an estimated closure date of 2034.⁹²

⁹⁰ Brown and Caldwell. *Water Supply Assessment for Jefferson Union High School District Master Plan Project*. December 2021. Page 2-2.

⁹¹ Sewage demand is estimated to be 85 percent of potable water demand (0.03 mgd).

⁹² CalRecycle. SWIS Facility Detail. Cordina Los Trancos (Ox Mtn) (41-AA-0002). Accessed on August 4, 2022. <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1561?siteID=3223>.

Electric, Telecommunication, and Natural Gas Facilities

Peninsula Clean Energy (PCE) is a public and locally controlled electricity provider for the County of San Mateo. Electricity provided by PCE is delivered through PG&E transmission lines. PG&E supplies natural gas services to the project area. Telecommunication services are also provided through underground infrastructure by various service providers.

3.19.2 Impact Discussion

For the purpose of determining the significance of the project's impact on utilities and service systems, would the project:

- 1) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?
- 2) Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?
- 3) Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?
- 4) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?
- 5) Be noncompliant with federal, state, or local management and reduction statutes and regulations related to solid waste?

3.19.2.1 *Project Impacts*

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

The proposed project would connect to an existing 10-inch water main located in Entry Drive. Additional 10-inch water mains would be installed along the new streets within the project site. Water service to the entire project site would be provided via the newly constructed water lines. Construction of this new water line would be subject to construction-related mitigation measures within this EIR and therefore, would not result in a significant environmental effect.

Wastewater/Sanitary Sewer

The project proposes to connect to the existing 10-inch sanitary sewer line in Serramonte Boulevard and six-inch sewer line in Callan Boulevard. In addition, the project would reroute existing 10-inch

sewer lines running through the project site to better align with future development under the proposed project. Woodard & Curran estimated the average daily wastewater flow to be generated by the proposed project and its effects on the existing wastewater system (see Appendix O). The proposed project's wastewater would not cause any capacity deficiencies in the rerouted on-site sewers or in the sewers on Serramonte Boulevard downstream, however, the project flows would contribute to capacity deficient sewers in the Serramonte Center and the 21-inch trunk sewer crossing the I-280 freeway to Junipero Serra Boulevard. The need for a 30-inch relief sewer line parallel to the 21-inch sewer crossing I-280 was identified in the 2009 Collection System Evaluation and Improvement Plan, and the project would be required to contribute a proportional fair share contribution toward the construction of the relief sewer line.

Stormwater Drainage

As discussed in Section 3.10 Hydrology and Water Quality, future development of the proposed Precise Plan would result in an overall increase of 88,545 square feet of impervious surfaces compared to existing conditions; however, the project would be designed to retain stormwater on-site and not exceed pre-project stormwater flows during a 10-year design storm. Thus, future development implementing the proposed Precise Plan, in conformance with applicable regulations, would not result in significant impacts to the storm drain system.

Electricity, Telecommunication, and Natural Gas Facilities

The project would tie-in to the existing electricity, telecommunication, and natural gas lines throughout the project site. Any conductor upsizing work would be performed by PG&E as needed.

All project construction associated with relocating existing facilities and extending connections to existing facilities would be subject to the construction-related mitigation measures within this EIR and conditions of approval typically applied to development project entitlements. Therefore, any needed relocation of existing facilities and extension of connections to existing facilities would not result in a significant environmental effect. **(Less than Significant Impact)**

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

Based on the WSA prepared for the project, in the event the Bay Delta Plan is implemented,⁹³ water demand would exceed supply in normal, single-dry, and multiple-dry year scenarios by 2023. Without implementation of the Bay Delta Plan, water demand would not exceed supply in normal, single-dry, and multiple-dry year scenarios through 2045. The project would increase water use on the site by approximately 202,600 gpd.⁹⁴ The project would result in a population increase that is within the estimated population projections used in the City's UWMP. The City identifies demand

⁹³ The implementation of the Bay Delta Plan is currently in litigation which creates uncertainty in the available supply for Daly City.

⁹⁴ Brown and Caldwell. *Hydraulic Analysis for the Westlake South Project*. April 2021. 712 net new residents x 60 gallons per capita per day = 42,720 gpd; 10,800 sf x 0.0450 gallons per sf per day = 486 gpd. Total project water use estimate: 42,720 gpd + 486 gpd = 43,206 gpd.

reduction actions in the UWMP that could be used to reduce water demand, ranging from voluntary reductions to prohibiting landscape irrigation. The use of demand reduction measure, which could be required City-wide in single-dry and multiple-dry year scenarios, ensures the City would have adequate water supply under all scenarios. The City, therefore, would have sufficient water supplies to serve the project and cumulative water demand during normal, dry, and multiple dry years. **(Less than Significant Impact)**

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

The WWTP has an average dry weather flow design capacity of 10.3 million gallons per day (mgd). The General Plan EIR determined that full buildout of the General Plan would generate approximately 6.66 mgd which is below the permitted flow rate of eight mgd, leaving 1.34 mgd of unused capacity at buildout. The project would add approximately 191,793 gpd (0.19 mgd) of wastewater to be treated at the WWTP, or approximately 14 percent of the unused capacity.⁹⁵ The project, therefore, results in a less than significant increase in wastewater flow. In addition, the WWTP monitors its wastewater to ensure that it meets all requirements and the RWQCB routinely inspects treatment facilities to ensure permit requirements are met. For these reasons, there would be adequate capacity at the WWTP. **(Less than Significant Impact)**

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

Waste generation and disposal data for Daly City is maintained by CalRecycle. According to CalRecycle, the total amount of solid waste landfilled from Daly City in 2021 was 45,636 tons.⁹⁶ The project would generate approximately 530 tons of solid waste per year.⁹⁷ The Ox Mountain Landfill has a remaining capacity of approximately 22,180,000 cubic yards of solid waste.⁹⁸ The project would increase solid waste generation in the City by approximately one percent and, therefore, would not generate solid waste in excess of local standards or capacity and would not impair the attainment of solid waste reduction goals. **(Less than Significant Impact)**

⁹⁵ Woodard & Curran. *Sanitary Sewer Capacity Evaluation for JUHSD Precise Plan*. October 2021. Page 2.

⁹⁶ CalRecycle. "Disposal Rate Calculator". Accessed August 15, 2022.
<https://www2.calrecycle.ca.gov/LGCentral/AnnualReporting/DisposalRateCalculator>.

⁹⁷ Illingworth & Rodkin, Inc. *Serramonte Del Rey Campus Redevelopment Project Air Quality and Greenhouse Gas Assessment*. June 17, 2022. Attachment 2: CalEEMod Modeling Inputs and Outputs.

⁹⁸ CalRecycle. "Solid Waste Information Sheet: Corinda Los Trancos Landfill (Ox Mtn) (41-AA-0002)." Accessed August 4, 2022. <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1561?siteID=3223>

Impact UTL-5: The project would not be noncompliant with federal, state, or local management and reduction statutes and regulations related to solid waste. **(Less than Significant Impact)**

The project would comply with solid waste management and reductions statutes and regulations including CALGreen requirements and Chapter 15.64 of the Daly City Municipal Code for recycling and salvaging of construction and demolition waste. **(Less than Significant Impact)**

3.19.2.2 *Cumulative Impacts*

Impact UTL-C: The project would not result in a cumulatively considerable contribution to a cumulatively significant utilities and service systems impact. **(Less than Significant Cumulative Impact)**

Relocation or construction of new or expanded utility facilities by other projects would also be subject to similar construction-related mitigation measures as the proposed project. The City's UWMP and the WSA prepared for the project, which accounts for cumulative demand, both concluded the City will have sufficient water supplies to accommodate growth within its service jurisdiction and will meet any potential supply shortfalls experienced during dry year conditions, through a combination of a short-term conservation program. With regard to wastewater treatment, the WWTP has an available capacity of approximately 1.34 mgd after full buildout of the General Plan. The Serramonte Shopping Center Expansion and Seton Medical Center Expansion projects are consistent with the City's General Plan and, therefore, their wastewater generation is already accounted for. The Serramonte Condominiums and Hotel project would generate approximately 88,660 gdp (0.09 mgd) of wastewater, which could be accommodated by the remaining capacity at the WWTP, in addition to the proposed project. Other projects would also be required to comply with CALGreen and Chapter 15.64 of the Daly City Municipal Code, thereby also reducing their construction and demolition waste by at least 60 percent. As previously discussed, Ox Mountain Landfill has a remaining capacity of approximately 22,180,000 cubic yards and an estimated closure date of 2034. Therefore, the Ox Mountain landfill could sufficiently accommodate the proposed project and the cumulative projects listed in Table 3.0-1. Therefore, the project would not result in a cumulatively considerable contribution to a cumulatively significant utilities and service systems impact. **(Less than Significant Cumulative Impact)**

3.20 WILDFIRE

3.20.1 Environmental Setting

3.20.1.1 *Existing Conditions*

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. Referred to as Fire Hazard Severity Zones (FHSZ), these maps influence how people construct buildings and protect property to reduce risk associated with wildland fires. The project site is not located in a FHSZ.⁹⁹

3.20.2 Impact Discussion

For the purpose of determining the significance of the project's impact on wildfire, if located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

- 1) Substantially impair an adopted emergency response plan or emergency evacuation plan?
- 2) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?
- 3) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?
- 4) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

3.20.2.1 *Project Impacts*

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

3.20.2.2 *Cumulative Impacts*

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

⁹⁹ CALFire. San Mateo County Fire Hazard Severity Zones in SRA. Adopted by CALFire on November 7, 2007. Map. Accessed August 15, 2022. https://osfm.fire.ca.gov/media/6802/fhszs_map41.pdf

SECTION 4.0 GROWTH-INDUCING IMPACTS

For the purposes of this project, a growth-inducing impact is considered significant if the project would:

- Cumulatively exceed official regional or local population projections;
- Directly induce substantial growth or concentration of population. The determination of significance shall consider the following factors: the degree to which the project would cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds planned levels in local land use plans; or
- Indirectly induce substantial growth or concentration of population (i.e., introduction of an unplanned infrastructure project or expansion of a critical public facility (road or sewer line) necessitated by new development, either of which could result in the potential for new development not accounted for in the Daly City 2030 General Plan).

Impact GRO-1: The project would not foster or stimulate significant economic or population growth in the surrounding environment. **(Less than Significant Impact)**

Under the existing General Plan and 1985 Precise Plan, the project site would be allowed to be developed with up to 175 residential units and 700,000 square feet of office uses. Compared to what is allowed by the 1985 Precise Plan, the project would result in a net increase of 1,060 residential units and a net decrease of 684,000 square feet of employment uses (office and retail). This net change in development would result in approximately 3,403 additional residents.¹⁰⁰ Compared to the buildout of the General Plan, the project would represent an approximately three percent net increase in the City's population.¹⁰¹ While the project would result in an increase in population and housing compared to what is allowed in the adopted 1985 Precise Plan and General Plan, the project would be consistent with the City's goal of maximizing opportunities for higher-density housing (General Plan Policy HE-1 and Policy LU-4) and meeting the City's RHNA target (General Plan Policy HE-6). In addition, the project would result in a minimal increase in population (three percent increase) compared to the City's estimated ABAG 2035 population of 115,015. The project, therefore, would not induce growth in an area that is not already planned for increased development.

The project site is located in an urban area on an already developed site that is served by existing infrastructure, including roadways and utilities. The growth resulting from the implementation of the proposed project would incrementally increase the use of existing community service facilities (refer to Sections 3.15 Public Services and 3.16 Recreation). Utility improvements would be sized to serve the proposed development, and would not be sized to have excess capacity that would induce growth in the area. In addition, the project would pay all applicable impact fees and taxes, which would

¹⁰⁰ 1,235 (number of housing units proposed) minus 175 (number of planned housing units) equals 1,060 housing units. Based on the City's average number of persons per housing unit (3.21), the 1,060 units would generate 3,403 additional residents. As the majority of employment uses would be eliminated, demand for housing from new businesses was assumed to be zero. Source: State of California, Department of Finance. E-5 Population Estimates for Cities, Counties, and the State—January 1, 2021-2022. May 2022.
<https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2022/>.

¹⁰¹ Buildout of the City's General Plan would result in 106,388 residents.

offset fiscal and service impacts to public facilities and services, including police and fire. As a result, growth associated with the implementation of the project would not have a significant impact on community service facilities, nor would it make a cumulatively considerable contribution to such impacts, requiring construction of new facilities that could cause significant environmental effects.

For the reasons discussed above, the project would not result in significant indirect growth-including impacts. **(Less than Significant Impact)**

SECTION 5.0 SIGNIFICANT AND IRREVERSIBLE ENVIRONMENTAL CHANGES

This section was prepared pursuant to CEQA Guidelines Section 15126.2(c), which requires a discussion of the significant irreversible changes that would result from the implementation of a proposed project. Significant irreversible changes include the irretrievable use of nonrenewable resources, the commitment of future generations to similar use, and irreversible damage resulting from environmental accidents associated with the project.

5.1.1 Irretrievable Use of Nonrenewable Resources

During construction and operation of the project, nonrenewable resources would be consumed. Unlike renewable resources, nonrenewable resources cannot be regenerated over time. Nonrenewable resources include fossil fuels and metals. Renewable resources, such as lumber and other wood byproducts, could also be used.

Energy, as discussed in more detail in Section 3.6 Energy, would be consumed during both the construction and operational phases of the project. The construction phase would require the use of nonrenewable construction material, such as concrete, metals, plastics, and glass. Nonrenewable resources and energy would also be consumed during the manufacturing and transportation of building materials, site preparation, and construction of the buildings. The operational phase would consume energy for multiple purposes including building heating and cooling, lighting, appliances, and electronics. Energy, in the form of fossil fuels, would be used to fuel vehicles traveling to and from the site.

The project would result in a substantial increase in demand for nonrenewable resources; however, the project is subject to the standard California Code of Regulations Title 24 Part 6, CALGreen standards, City of Daly City Green Building requirements, and Recycling and Diversion of Construction and Demolition Ordinance. In addition, as discussed in Section 3.6 Energy, the electricity for the project would be provided by Peninsula Clean Energy from sources that are 100 percent carbon-free. For these reasons, future projects would minimize the use of nonrenewable energy resources.

5.1.2 Commitment of Future Generations to Similar Use

The project would redevelop a currently developed site surrounded by urban uses. Development of the proposed project would commit a substantial amount of resources to prepare the site, construct the buildings, and operate them, but it would not result in development in an area where urban development does not already exist.

5.1.3 Irreversible Damage Resulting from Environmental Accidents

The project proposes a residential, mixed-use development that is not a uniquely hazardous use nor likely to cause environmental accidents that impact adjacent areas. As discussed in Section 3.9 Hazards and Hazardous Materials, there are no significant unmitigable hazards and hazardous materials conditions on-site or off-site that would substantially affect the public and surrounding environment. Additionally, there are no significant unmitigable geology and soils impacts which

would result from implementation of the project. For these reasons, the project would not result in irreversible damage that may result from environmental accidents.

SECTION 6.0 SIGNIFICANT AND UNAVOIDABLE IMPACTS

A significant unavoidable impact is an impact that cannot be mitigated to a less than significant level if the project is implemented as it is proposed. The proposed project would not result any significant and unavoidable impacts, as all significant impacts are capable of being mitigated to acceptable levels by feasible mitigation measures included in the project.

SECTION 7.0 ALTERNATIVES

The California Environmental Quality Act (CEQA) requires that an EIR identify and evaluate alternatives to a project as it is proposed. Two key provisions from the CEQA Guidelines pertaining to the discussion of alternatives are included below:

Section 15126.6(a). Consideration and Discussion of Alternatives to the Proposed Project.

An EIR shall 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. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.

Section 15126.6(b). Purpose. Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), 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 these alternatives would impede, to some degree, the attainment of the project objectives, or be more costly.

Other elements of the CEQA Guidelines discuss that alternatives should include enough information to allow a meaningful evaluation and comparison with the proposed project. The CEQA Guidelines state that if an alternative would cause one or more additional impacts, compared to the proposed project, the discussion should identify the additional impact, but in less detail than the significant effects of the proposed project.

The three critical factors to consider in selecting and evaluating alternatives are: (1) the significant impacts from the proposed project that could be reduced or avoided by an alternative, (2) consistency with the project's objectives, and (3) the feasibility of the alternatives available. Each of these factors is discussed below.

7.1 SIGNIFICANT IMPACTS FROM THE PROJECT

7.1.1 Significant Unavoidable Impacts

As mentioned above, the CEQA Guidelines advise that the alternatives analysis in an EIR should be limited to potentially feasible alternatives that would avoid or substantially lessen any of the significant effects of the project and would achieve most of the project objectives. The project would not result in any significant, unavoidable impacts.

7.1.2 Less than Significant Impacts with Mitigation Incorporated

Alternatives may also be considered if they would further reduce impacts that are already less than significant because of required or proposed mitigation. Impacts that would be significant, but for which the mitigation is available to reduce them to less than significant levels include:

- Air Quality (construction criteria pollutants, TAC health risk)
- Biological Resources (bats, nesting birds)
- Cultural Resources (archaeological resource/human remains)
- Geology and Soils (paleontological resources)
- Hazards and Hazardous Materials (underground/aboveground storage tanks)
- Noise (construction noise)
- Transportation (vehicle miles traveled, construction traffic, pedestrian/bicycle safety, emergency access)
- Tribal Cultural Resources (unknown buried tribal cultural resources)

Table 7.4-2 summarizes the project and project alternatives impacts, including less than significant impacts with mitigation incorporated.

7.2 PROJECT OBJECTIVES

Pursuant to CEQA Guidelines Section 15124, the EIR must include a statement of the objectives sought by the proposed project. While CEQA does not require that alternatives be capable of meeting all of the project objectives, their ability to meet most of the objectives is considered relevant to their consideration. The stated objectives of the project proponent include the following:

- Advance an innovative land use master plan to attract investment, stabilize District finances, increase funding for student education and attract and retain highly qualified teachers and staff.
- Permit development consistent with the City's General Plan that enables redevelopment of underutilized properties with higher-density, transit supportive development that facilitates bicycle and pedestrian access along an established, highly utilized transit corridor, as outlined in the 2020 Walk Bike Daly City Master Plan.
- Create a pedestrian scale neighborhood with an attractive public realm of park and outdoor spaces, inviting to the surrounding community and people of all ages.
- Maximize the number of new high-quality market-rate and affordable housing units as a well-designed, economically feasible, urban residential neighborhood with sufficient density to create a safe, active neighborhood, with development phasing subject to market conditions that provides flexibility with the sequence of construction of buildings, open space, streets, and infrastructure.
- Create opportunities to connect people with nature through open space design, a new recreational trail and immediate proximity to wooded hillside areas.
- Encourage active transportation with safe on and off-street bike routes and pedestrian-oriented urban design that encourages bicycle, pedestrian, and transit access to, from and through the site.

- Design traffic-calmed residential streets for low volume, slow vehicle access between the intersection of Highway 1 and Serramonte Boulevard and the existing Campus Drive south of the Plan Area.

7.3 FEASIBILITY OF ALTERNATIVES

CEQA, the CEQA Guidelines, and the case law on the subject have found that feasibility can be based on a wide range of factors and influences. The CEQA Guidelines advise that such factors can include (but are not necessarily limited to) the suitability of an alternate site, economic viability, availability of infrastructure, consistency with a general plan or with other plans or regulatory limitations, jurisdictional boundaries, and whether the project proponent can “reasonably acquire, control or otherwise have access to the alternative site (Section 15126.6[f][1]).”

7.4 ALTERNATIVES ANALYSIS

7.4.1 Alternatives Considered But Rejected

7.4.1.1 *Location Alternative*

CEQA encourages consideration of an alternative site when significant effects of the project might be avoided or substantially lessened. Only locations that would avoid or substantially lessen any of the significant impacts of the project and meet most of the project objectives need be considered for inclusion in the EIR. In order to identify an alternative site that might reasonably be considered to “feasibly accomplish most of the basic purposes” of the project, and would also mitigate some or all of the significant impacts of the project, it is assumed that such a site would need to have the following characteristics:

- Approximately 20-acres or more in size;
- Located on land owned by the Jefferson Union High School District (JUHSD);
- Located on an underutilized, already developed property;
- Served by available infrastructure and nearby commercial amenities; and
- Immediately available.

The project objectives focus on developing residential uses on land owned by JUHSD to help stabilize JUHSD finances. JUHSD currently operates five high schools, including three in the City of Daly City (Westmoor, Jefferson, and Thornton High Schools) and two in the City of Pacifica (Oceana and Terra Nova High Schools), and the Serramonte Del Rey campus located on the project site. While these high school sites may have undeveloped space that meets the size requirement, they do not include underutilized facilities that would benefit from redevelopment to higher-density residential and commercial uses. In addition, JUHSD recently received approval for construction of a new district office and adult education building located adjacent to Westmoor High School (see Figure 2.2-6). This new building would replace the existing district office uses on the project site, rendering the current project site vacant and allowing for new tenants or redevelopment. Further, location alternatives were rejected because the potentially suitable sites located on JUHSD land would not reduce the identified less than significant construction criteria pollutant, TAC health risk, and construction noise impacts because construction would occur on these alternative sites in a

similar manner to the proposed project site and the surrounding mix of uses is similar (with sensitive residential and/or school receptors in the immediate vicinity). Other construction related impacts, such as disturbance of nesting or water quality impacts, would be similar and require the same mitigation identified for the subject site. Since no feasible alternative site was identified that would avoid or lessen the project impacts, a location alternative was not further analyzed.

7.4.1.2 *Mixed-Use Alternative*

The project proposes a mostly residential development with 1,035 residential units and 14,000 square feet of commercial uses. The Mixed-Use Alternative was considered to reduce the VMT per resident below the countywide threshold by introducing office uses to the site and creating a mixed-use live/work community to avoid or lessen the need for ongoing mitigation in the form of a TDM program that reduces project trips. The Mixed-Use Alternative includes 1,035 residential units and 230,000 square feet of office space. The modeling results, however, show that this alternative's VMT per resident would remain at 12 VMT and continue to exceed the countywide threshold of 11.6 VMT per resident. In addition, this alternative would generate 17.9 VMT per office employee, which would exceed the countywide threshold of 14.3 VMT and regionwide threshold of 13.1.¹⁰² Further, this alternative would result in an additional 230,000 square feet of building square footage, resulting in greater construction impacts compared to the proposed project. Since the Mixed-Use Alternative would not reduce the VMT per resident and create a new office VMT impact, this alternative was rejected.

7.4.1.3 *Reduced Housing Alternative*

The purpose of a Reduced Housing Alternative would be to reduce the project's impacts that result from the overall scale of the development by developing a smaller program of development. Of the project's significant impacts, only air quality, noise, and transportation impacts could potentially benefit from a reduced housing alternative. All other impacts are related to site/ground disturbance, which any amount of development would incur. VMT is expressed as a per resident number; therefore, while a reduced housing alternative would reduce overall trips, it would not cause a change in the amount of VMT per resident. Thus, the VMT impact of the Reduced Housing Alternative would be the same as the proposed project. Construction criteria pollutant air quality emissions and construction noise impacts tied to the amount of building construction activity could be further reduced with a reduced housing alternative; however, the project's construction ROG emissions are related to architectural coatings applied in the last year of project construction. The Reduced Housing Alternative would have similar ROG emissions, as architectural coatings, during the last year of construction; therefore, this alternative would not result in similar ROG emissions impacts as the proposed project. This alternative would partially meet the project's objectives to redevelop underutilized properties with high-density development and maximize the number of market-rate housing units in order to stabilize JUHSD's finances; however, the cost of land improvement (i.e., demolition, grading, infrastructure, off-site improvements) would remain unchanged and the reduced housing would lower revenue generated to off-set those costs. In addition, the No Project – Existing Zoning Alternative is another reduced development alternative (see Section 7.4.2.2 below). For these reasons, this alternative was rejected.

¹⁰² Fehr & Peers, Inc. *Serramonte Del Rey Precise Plan – Alternatives VMT*. April 2023.

7.4.2 Analyzed Alternatives

In addition to a “No Project” Alternative, the CEQA Guidelines advise that the range of alternatives discussed in the EIR should be limited to those that “would avoid or substantially lessen any of the significant effects of the project” (Section 15126.6[f]). The discussion below addresses alternatives which could reduce project impacts and are feasible from a physical land use, infrastructure, site suitability, and general plan consistency perspective, and whether the proponent can reasonably acquire, control, or otherwise have alternative access to the site. This Draft EIR does not evaluate the financial or economic feasibility of the alternatives. The components of these alternatives are described below, followed by a discussion of their impacts and how they would differ from those of the proposed project.

7.4.2.1 *No Project Alternative*

The CEQA Guidelines specifically require consideration of a “No Project” Alternative. The purpose of including a No Project Alternative is to allow decision makers to compare the impacts of approving the project with the impacts of not approving the project. The Guidelines specifically advise that the No Project Alternative is “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.” The Guidelines emphasize that an EIR should take a practical approach, and not “...create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment (Section 15126.6[e][3][B]).”

The No Project Alternative assumes that the project site would remain as it is today with the existing buildings being reoccupied.

Comparison of Environmental Impacts

The No Project Alternative would avoid all the project’s environmental impacts.

Relationship to Project Objectives

The No Project Alternative would not meet most of the project objectives as no change would be made to the existing land uses at the site and the current land uses do not provide any residential facilities. In addition, the current project site design is low density and not transit oriented. The No Project Alternative could potentially partially meet the project’s objective to attract investment and stabilize District finances by renovating the existing buildings and leasing them to new tenants, although the market for new office or other tenants to occupy the existing JUHSD headquarters campus is unknown.

Conclusion

Because the No Project Alternative would not result in any new development on the site, this alternative would avoid all environmental impacts of the project. This alternative would not, however, meet most of the project’s objectives, in particular those related to providing substantial new housing opportunities on the site.

7.4.2.2 *No Project – Existing Zoning Alternative*

This alternative assumes the project is not approved and the project site is redeveloped consistent with the current zoning of PD-31 (Planned Development District).¹⁰³ The PD-31 zoning is the current 1985 Precise Plan for the project site, which allows for the development of up to 175 residential units (in addition to the units developed on Parcel A) and approximately 700,000 square feet of office space, resulting in approximately one millions square feet of building space.¹⁰⁴ Associated infrastructure and roadway improvements would also be required in order to construct the No Project – Existing Zoning Alternative. Based on the City’s average number of persons per housing unit (3.21), the 175 residential units would generate 562 additional residents.¹⁰⁵ The 700,000 square feet of office space is estimated to generate approximately 2,100 employees (using an estimate of three employees per 1,000 square feet).

Comparison of Environmental Impacts

The No Project – Existing Zoning Alternative would result in the development of approximately 175 residential units and 700,000 square feet of office, while the proposed project would develop the site with 1,235 residential units (including Parcel A units) and up to 14,000 square feet of neighborhood-serving retail/commercial uses (in addition to 1,400 square feet for a Head Start childcare facility). Overall the No Project – Existing Zoning Alternative would result in approximately one million square feet of building space, while the proposed project would result in approximately 1.5 million square feet of building space. The No Project – Existing Zoning Alternative would trade residential density for office density; however, the intensity and duration of construction required in order to construct 700,000 square feet of office space and 175 residential units would less than the proposed project, as this alternative reduces the overall building square footage by approximately 500,000 square feet less. Given that the overall building square footage would be smaller than the proposed project, the No Project – Existing Zoning Alternative would result in lesser construction criteria pollutant, TAC health risk, construction noise, and construction traffic impacts.

As discussed above, the No Project – Existing Zoning Alternative would trade residential density for office density. As a result, VMT for this alternative is calculated based on a per resident and per employee metric. As shown in Table 7.4-1 below, the residential component of the No Project – Existing Zoning Alternative is projected to generate 12.2 VMT per resident (0.2 VMT higher than the proposed project), which is below the regionwide significance threshold of 12.4 VMT per resident, but in excess of the countywide threshold of 11.6 VMT per resident. The office component of this alternative is projected to generate 17.5 VMT per employee, which exceeds the regionwide significance threshold of 14.3 VMT and the countywide significance threshold of 13.1 VMT. As a result, the No Project – Existing Zoning Alternative would result in more significant VMT impacts than the proposed project in that it would increase the per resident VMT and introduce a significant office VMT impact.

¹⁰³ A smaller portion of the of the site in the northwest corner (Parcel A Development project) is zoned to PD-31A. The PD-31A zoning was specifically created to allow for the Parcel A Development project, which will construct 122 multifamily units. Since this project is already approved and under construction, the remainder of the project site would be developed consistent with the PD-31 zoning.

¹⁰⁴ Assumes a total of 297 residential units (Parcel A project [122] + existing zoning[175]) and each residential unit requires approximately 1,000 square feet of building space. $700,000 + 297,000 = 997,000$.

¹⁰⁵ State of California, Department of Finance. *E-5 Population Estimates for Cities, Counties, and the State—January 1, 2021-2022*. May 2022.

Table 7.4-1: No Project – Existing Zoning Alternative VMT				
Level of Analysis	Existing VMT per resident/employee	Significance Threshold¹	Alternative VMT per resident	Significant Impact?²
Countywide	13.6/16.8	11.6/14.3	12.2/17.5	Yes/Yes
Regionwide	14.6/15.4	12.4/13.1	12.2/17.5	No/ Yes
Notes: ¹ The significant threshold is 15 percent below the existing VMT per resident/employee. ² Significant impacts shown in bold . Source: Fehr & Peers, Inc. <i>Serramonte Del Rey Precise Plan – Alternatives VMT</i> . April 2023.				

The No Project – Existing Zoning Alternative would result in the same or similar less than significant impacts (with mitigation) as the proposed project related to biology, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, tribal cultural resources, and utilities and service systems.

Relationship to Project Objectives

The No Project – Existing Zoning Alternative would not meet the project objective of providing new market-rate and affordable housing given this alternative would yield 175 units, substantially below the 1,235 proposed. This alternative would result in substantial office space on the project site, which is not an objective of the project.

Conclusion

The No Project – Existing Zoning Alternative would result in reduced impacts to construction criteria pollutant emissions, TAC health risk, construction noise, and construction traffic; however, it would result in a more significant VMT impact compared to the proposed project. This alternative would result in similar or same impacts to all other environmental resources. The No Project – Existing Zoning Alternative would not meet the project’s objectives for providing new market-rate and affordable housing units and would partially meet the project’s objective to redevelop an underutilized site with a high-density land use plan.

7.4.3 Environmentally Superior Alternative

The CEQA Guidelines state that an EIR shall identify an environmentally superior alternative. Based on the above discussion, the environmentally superior alternative to the proposed project is the No Project Alternative because all of the project’s significant environmental impacts would be avoided. However, Section 15126.6(e)(2) states that “if the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” In addition to the No Project Alternative, the No Project – Existing Zoning Alternative would lessen the project’s construction criteria pollutant, TAC health risk, construction noise, and construction traffic impacts .

Table 7.4-2: Summary of Project and Project Alternative Impacts			
Impacts	Proposed Project	No Project Alternative	No Project – Existing Zoning Alternative
Aesthetics	LTS	NI	LTS
Agricultural and Forestry Resources	NI	NI	NI
Air Quality	SM	NI	SM
Biological Resources	SM	NI	SM
Cultural Resources	SM	NI	SM
Energy	LTS	NI	LTS
Geology and Soils	SM	NI	SM
Greenhouse Gas Emissions	LTS	NI	LTS
Hazards and Hazardous Materials	SM	NI	SM
Hydrology and Water Quality	SM	NI	LTS
Land Use	LTS	NI	LTS
Mineral Resources	NI	NI	NI
Noise	SM	NI	SM
Population and Housing	LTS	NI	LTS
Public Services	LTS	NI	LTS
Recreation	LTS	NI	LTS
Transportation/Traffic	SM	NI	SM
Tribal Cultural Resources	SM	NI	SM
Utilities and Service Systems	SM	NI	SM
Wildfire	NI	NI	NI
Meets Project's Objectives?	Yes	No	No
Notes: SU = Significant unavoidable impact; SM = Significant impact, but can be mitigated to a less than significant level; LTS = Less than significant impact; and NI = No impact. Bold text indicates being environmentally superior to the proposed project where the impact is to a lesser extent.			

SECTION 8.0 REFERENCES

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SECTION 9.0 LEAD AGENCY AND CONSULTANTS

9.1 LEAD AGENCY

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SECTION 10.0 ACRONYMS AND ABBREVIATIONS

ABAG	Association of Bay Area Governments
ACM	Asbestos-containing material
AIA	Airport Influence Area
ALUCP	Airport Land Use Compatibility Plan
BAAQMD	Bay Area Air Quality Management District
Bgs	Below ground surface
BMPs	Best Management Practices
Btu	British thermal units
CalARP	California Accidental Release Program
CAL FIRE	California Department of Forestry and Fire Protection
Cal/OSHA	California Department of Industrial Relations, Division of Occupational Safety and Health
CalTrans	California Department of Transportation
CAP	Clean Air Plan
CARB	California Air Resources Board
CBC	California Building Code
C/CAG	City/County Association of Governments
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CEQA	California Environmental Quality Act
CFCs	Chlorofluorocarbons
CGS	California Geological Survey
CH ₄	Methane
C-MU	Commercial - Mixed Use
CMP	Congestion Management Plan
CO	Carbon monoxide
CO ₂	Carbon dioxide
CO ₂ e	Carbon dioxide equivalent
CRHR	California Register of Historical Resources

CUPA	Certified Unified Program Agency
DPM	Diesel particulate matter
DTSC	Department of Toxic Substances Control
DU	Dwelling unit
DWWR	Department of Water and Wastewater Resources
EIR	Environmental Impact Report
EO	Executive Order
EOC	Emergency Operations Center
EOP	Emergency Operations Plan
EPA	Environmental Protection Agency
EV	Electric Vehicle
FAA	Federal Aviation Administration
FAR	Federal Aviation Regulations
FEMA	Federal Emergency Management Agency
FHBM	Flood Hazard Boundary Map
FHSZ	Fire Hazard Severity Zones
FIRM	Flood Insurance Rate Maps
FMMP	Farmland Mapping and Monitoring Program
FTA	Federal Transit Administration
GHGs	Greenhouse gases
Gpcd	Gallons per capita per day
Gpd	Gallons per day
GWP	Global warming potential
HASP	Health and Safety Plan
HCP	Habitat Conservation Plan
HFCs	Hydrofluorocarbons
HI	Hazard Index
HSWA	Federal Hazardous and Solid Waste Amendments
HVAC	Heating, ventilation, and air conditioning
In./sec	Inches/second
ITE	Institute of Transportation Engineers
LBP	Lead-based paint
LID	Low-impact development

LOS	Level of service
MBTA	Migratory Bird Treaty Act
MEI	Maximally exposed individual
MGY	Million gallons per year
MMTCO _{2e}	Million metric tons of CO ₂ E
MND	Mitigated Negative Declaration
Mpg	Miles per gallon
Mph	Miles per hour
MRP	Municipal Regional Stormwater NPDES Permit
MTC	Metropolitan Transportation Commission
NAHC	Native American Heritage Commission
NCFA	North County Fire Authority
NCP	National Contingency Plan
NESHAP	National Emission Standards for Hazardous Air Pollutants
NFIP	National Flood Insurance Program
NHPA	National Historic Preservation Act
N ₂ O	Nitrous oxide
NOD	Notice of Determination
NOI	Notice of Intent
NO _x	Nitrogen oxide
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NSFHA	Non-Special Flood Hazard Area
NSMCSD	North San Mateo County Sanitation District
O ₃	Ground-level ozone
OITC	Outdoor-Indoor Transmission Class
OPR	Office of Planning and Research
PCBs	Polychlorinated biphenyls
PCE	Peninsula Clean Energy
PD	Planned Development
PDA	Priority Development Areas
PFCs	Perfluorocarbons
PM	Particulate matter

PPV	Peak particle velocity
RAW	Removal Action Workplan
RCRA	Resource Conservation and Recovery Act
RHNA	Regional Housing Need Allocation
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCS	Sustainable Communities Strategy
Sf	Square feet
SF ₆	Sulfur hexafluoride
SFHA	Special Flood Hazard Area
SFO	San Francisco International Airport
SFPUC	San Francisco Public Utilities Commission
SHMA	Seismic Hazards Mapping Act
SMARA	Surface Mining and Reclamation Act
SMCEHSD	San Mateo County Environmental Health Services Division
SMGB	State Mining and Geology Board
SMOA	San Mateo County Operational Area
SO _x	Sulfur oxide
SR	State Route
STC	Sound Transmission Class
STLC	Soluble Threshold Limit Concentration
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	Toxic air contaminant
TAZ	Transportation Analysis Zone
TCRs	Tribal Cultural Resources
TIA	Traffic Impact Analysis
TSCA	Toxic Substances Control Act
USACE	United States Army Corps of Engineers
USFWS	United States Fish and Wildlife Service
UWMP	Urban water management plan
VMT	Vehicle miles traveled