TANFORAN REDEVELOPMENT PROJECT
FINAL ENVIRONMENTAL IMPACT REPORT

SCH# 2023120409

PREPARED FOR:

City of San Bruno
567 El Camino Real
San Bruno, CA 94066
Contact: Peter Gilli
pgilli@sanbruno.ca.gov

PREPARED BY:

ICF
595 Market Street, Suite 950
San Francisco, CA 94105
Contact: Heidi Mekkelson
heidi.mekkelson@icf.com

October 2026



ICF. 2026. *Tanforan Redevelopment Project Final Environmental Impact Report*. October. (ICF 104709.0.001) San Francisco, California. Prepared for City of San Bruno, San Bruno, California.

Contents

List of Tables ii
List of Acronyms and Abbreviations iii
Chapter 1 **Introduction** **1-1**
1.1 Environmental Review Process 1-1
1.2 Document Organization 1-2
Chapter 2 **Comments Received on the Draft EIR** **2-1**
2.1 Responses to Comments 2-1
2.1.1 Master Responses 2-2
2.1.2 Individual Responses to Comments 2-12
Responses to Comment Letter 1 (Federal Aviation Administration) 2-94
Responses to Comment Letter 2 (Caltrans – District 4) 2-95
Responses to Comment Letter 3 (San Mateo County Groundwater Protection Program) 2-99
Responses to Comment Letter 4 (San Francisco Public Utilities Commission) 2-100
Responses to Comment Letter 5 (One Shoreline) 2-100
Responses to Comment Letter 6 (San Francisco International Airport) 2-103
Responses to Comment Letter 7 (San Mateo County Transit District) 2-108
Responses to Comment Letter 8 (Nicholas Wilsey) 2-109
Responses to Comment Letter 9 (Tim and Julia Gretter Fernandez) 2-111
Responses to Comment Letter 10 (George Reade) 2-112
Responses to Comment Letter 11 (Shirley Reed) 2-112
Responses to Comment Hearing Transcript 12 (Isan) 2-112
Responses to Comment Hearing Transcript 13 (Matt) 2-113
Responses to Comment Hearing Transcript 14 (George) 2-115
Responses to Comment Letter 15 (Nor Cal Carpenters Union) 2-116
Responses to Comment Letter 16 (Silicon Valley Bicycle Coalition) 2-116
Responses to Comment Letter 17 (Climate Resilient Communities) 2-117
Responses to Comment Letter 18 (Resilient San Bruno) 2-118
2.2 References 2-120
Chapter 3 **Revisions to the Draft EIR** **3-1**
Executive Summary 3-1
2.0 Project Description 3-5
3.1 Air Quality 3-5
3.3 Cultural Resources 3-7
3.5 Geology, Soils, and Paleontology 3-9

3.7 Hazards and Hazardous Materials 3-9
3.8 Hydrology and Water Quality 3-13
3.9 Land Use 3-13
3.10 Noise 3-15
3.14 Transportation 3-16
Appendices 3-16

Appendices

Final EIR Appendix 3.8-1, *Storm Drain System Capacity Study*

Tables

Table 2-1. List of Commenters 2-1

Table 3.1-4. Ambient Air Quality Data for the Project Area (~~2021~~2022~~–2023~~2024) 3-6

Figures

Figure FEIR 2-1. Temporary Crane Filings 2-8

Acronyms and Abbreviations

Term	Definition
AC	Advisory Circular
AIP	Airport Improvement Program
Air District	Bay Area Air District
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
AMSL	above mean sea level
BAAQMD	Bay Area Air Quality Management District
BART	Bay Area Rapid Transit
BSL	biosafety level
C/CAG	City/County Association of Governments of San Mateo County
Caltrans	California Department of Transportation
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
City	City of San Bruno
CLEEN	Continuous Lower Energy, Emissions, and Noise
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CPTED	Crime Prevention Through Environmental Design
dB	decibel
dBA	A-weighted decibel
Draft EIR	Draft Environmental Impact Report
EIR	Environmental Impact Report
EPA	U.S. Environmental Protection Agency
FAA	Federal Aviation Administration
FAA Solar Guide	Technical Guidance for Evaluating Selected Solar Technologies on Airports
Final EIR	Final Environmental Impact Report
HEPA	High-Efficiency Particulate Air
HRA	Health Risk Assessment
HVAC	heating, ventilation, and air conditioning
IS/MND	Initial Study/Mitigated Negative Declaration
LID	Low impact development
MERV	Minimum Efficiency Reporting Value
NAVD88	North American Vertical Datum of 1988
NIP	Noise Insulation Program
NOAA	National Oceanic and Atmospheric Administration
PCB	polychlorinated biphenyl

Term	Definition
PM2.5	particulate matter less than 2.5 microns in diameter
PPG	Planning Policy Guidance
project	Tanforan Redevelopment Project
PV	photovoltaic
RHNA	Regional Housing Needs Allocation
ROW	Right-of-Way
SB	Senate Bill
SFBRWQCB	San Francisco Bay Regional Water Quality Control Board
SFO	San Francisco International Airport
SFPUC	San Francisco Public Utilities Commission
SR	State Route
STC	Sound Transmission Class
SWMM	Stormwater Management Model
SWPPP	Stormwater Pollution Prevention Plan
TDM	Travel Demand Management
VMT	vehicle miles traveled

Chapter 1
Introduction

The purpose of this document is to present comments submitted on the Draft Environmental Impact Report (Draft EIR) for the Shops at Tanforan Shopping Center (project), respond in writing to comments on environmental issues, and revise the Draft EIR as necessary to provide additional clarity. Pursuant to the California Environmental Quality Act (CEQA), Public Resources Code Section 21091(d)(2)(A) and (B), the City of San Bruno (City) considered the comments received, evaluated the environmental issues raised, and provided written responses that fully address the comments on significant environmental issues raised by the commenters. This document also provides limited responses, for informational purposes, to general comments on the Draft EIR received during the public review period that were not related to environmental issues. Where appropriate, this document also includes Environmental Impact Report (EIR) text changes made in response to the comments or at the initiation of the City. Together, the Draft EIR and this document comprise the Final Environmental Impact Report (Final EIR) for the project.

This Final EIR fulfills CEQA requirements and is consistent with CEQA Guidelines Section 15132.

1.1 Environmental Review Process

This Final EIR has been prepared by the City, the lead agency for the project, in compliance with the provisions of CEQA and the CEQA Guidelines (California Public Resources Code Section 21000 et seq. and California Code of Regulations Title 14, Section 15000 et seq. [CEQA Guidelines]). The Draft EIR was published and posted on the City's website on June 27, 2025. A Notice of Availability was distributed to state and local agencies, neighbors, and other interested parties to solicit public comment. The Draft EIR was available for public comment from June 27, 2025, to August 11, 2025. The notice solicited comments on the adequacy and accuracy of information presented in the Draft EIR. Comments were made in written form during the public comment period and as oral testimony at the public hearing on the Draft EIR held on July 29, 2025. The comments received during the public review period are the subject of this Final EIR, which addresses all substantive written and oral comments on the Draft EIR.

The Final EIR includes comments received during the public review period, responses to the comments on environmental issues, and any revisions to the Draft EIR that resulted from staff-initiated text changes or text changes in the responses.

The information provided in the responses and the revisions to the Draft EIR clarifies and amplifies the analysis presented in the Draft EIR. No significant new information, as defined by CEQA Guidelines Section 15088.5, was added that would trigger recirculation of the Draft EIR. Specifically, there are no new significant environmental impacts. No substantial increase in the severity of any significant impact has been identified, and no new alternatives or mitigation measures were identified in the comments or responses that were not already identified in the Draft EIR.

The City has distributed this Final EIR to the Planning Commission and City Council. The Planning Commission anticipates holding a hearing on October 20, 2026, to consider the adequacy of the Final EIR. If the Planning Commission finds that the EIR has been completed in compliance with CEQA and

that it reflects the City's independent judgment, pursuant to the requirements of CEQA Guidelines Section 15090, it will recommend certification of the document as a Final EIR to the City Council. The City anticipates that certification of the Final EIR will be considered by the City Council on November 10, 2026. The City decision-makers will consider the certified Final EIR, along with other information received during the public review process, to determine whether to approve, modify, or disapprove the project and specify the mitigation measures that will be required as conditions of project approval in a Mitigation Monitoring and Reporting Program.

If City decision-makers decide to approve the project, even though significant environmental impacts identified in the Final EIR have not been avoided or reduced to less-than-significant levels, they must indicate that such unavoidable significant impacts are acceptable because of overriding economic, legal, social, technological, or other considerations, as described in CEQA Guidelines Section 15093. This is known as a Statement of Overriding Considerations, in which the City balances the benefits of a proposed project against unavoidable environmental risks. If the benefits of a project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered acceptable (CEQA Guidelines Section 15093). If an agency adopts a Statement of Overriding Considerations, the statement must be included in the record of project approval.

1.2 Document Organization

This Final EIR is organized into the following chapters.

- **Chapter 1, *Introduction***, discusses the purpose of the Final EIR, the environmental review process for the EIR, and the organization of the Final EIR.
- **Chapter 2, *Comments and Responses***, presents comments from the public hearing held on July 29, 2025, and written comments on the Draft EIR. The comments are organized in order by federal agencies, state agencies, regional and local agencies, and organizations and individuals. Each letter or comment is numbered and each comment within the letter is delineated and numbered. Thus, each discrete comment has a unique comment code. Following the letters and comments are the City's responses. The responses generally clarify the Draft EIR text. They may also reference revisions or additions to the Draft EIR shown in Chapter 3, *Revisions to the Draft EIR*.
- **Chapter 3, *Revisions to the Draft EIR***, presents text changes to the Draft EIR made as a result of the responses to the comments and staff-initiated text changes identified by City staff members to update, correct, or clarify the Draft EIR text. New text is <u>underlined</u> and deleted text is shown in ~~strikethrough~~.

Chapter 2
Comments Received on the Draft EIR

This chapter includes a list of the agencies, organizations, and individuals who commented on the Draft Environmental Impact Report (Draft EIR) for the Tanforan Redevelopment Project (project) and the actual comment letters submitted on the Draft EIR. The comment letters, which include both letters and emails, have been numbered as shown in Table 2-1. Individual comments within each letter have been delineated and numbered. A response to each comment is provided, and each individual response is numbered to correspond with the comment to which it responds.

Table 2-1. List of Commenters

Letter #	Commenter	Date Received
Federal Agencies		
1	Federal Aviation Administration (Raquel Girvin, Regional Administrator)	August 11, 2025
State Agencies		
2	California Department of Transportation (Melissa Hernandez)	August 6, 2025
Regional and Local Agencies		
3	San Mateo County Groundwater Protection Program (Jacob Madden, PG)	July 17, 2025
4	San Francisco Public Utilities Commission (Elton Wu)	July 29, 2025
5	One Shoreline (Summer Bundy)	August 11, 2025
6	SFO (Judi Mosqueda)	August 11, 2025
7	San Mateo County Transit District (Bo Baney)	August 11, 2025
Organizations and Individuals		
8	Nicholas Wilsey	July 4, 2025
9	Tim and Julia Gretter Fernandez	July 28, 2025
10	George Reade	July 29, 2025 (Comment Card)
11	Shirley Reed	July 29, 2025 (Comment Card)
12	Isan (Transcript)	July 29, 2025 (Transcript)
13	Matt (Transcript)	July 29, 2025 (Transcript)
14	George (Transcript)	July 29, 2025 (Transcript)
15	Nor Cal Carpenters Union (Harvey McKeon)	August 11, 2025
16	Silicon Valley Bicycle Coalition (Matt Jones)	August 11, 2025
17	Climate Resilient Communities (Violet Wulf-Saena)	August 12, 2025
18	Resilient San Bruno (Nicole Hanhan)	August 12, 2025

2.1 Responses to Comments

This section includes comments on the Draft EIR and responses to those comments. Comments from the public hearing and comments provided via letters and emails that raise environmental issues are bracketed and numbered; each comment is followed by a response to the comment raised.

Where revisions to the Draft EIR are appropriate to respond to comments, such changes are referenced in the response and shown fully in Chapter 3, *Revisions to the Draft EIR*. In other cases, where not otherwise specified, the information provided in the responses is deemed adequate, and modification of the Draft EIR text is not necessary.

2.1.1 Master Responses

Several comments raised similar or related issues. Rather than responding individually, master responses have been developed to address the topics comprehensively. A reference to the master response is provided, where relevant, in responses to the individual comment.

2.1.1.1 Master Response 1 (Air Quality)

Multiple commenters expressed concern regarding how air quality impacts from construction and operation of the project would affect people living and working in the area. Section 3.1, *Air Quality*, of the Draft EIR comprehensively evaluated the health risks and pollutant concentrations caused by the project on both existing receptors and future receptors, also known as *off-site receptors* and *on-site receptors*, respectively. Existing receptors are those people who currently live and work in the project area but are located off-site and may be exposed to pollutant concentrations during project construction or operations. Future receptors are those people who will live or work within the project site, once construction is partially or totally complete.

Draft EIR Table 3.1-12 presents the results from the health-risk modeling conducted for the Draft EIR analysis for multiple exposure scenarios and for off-site and on-site receptors. As shown in the table, cancer health-risk values, non-cancer health-risk values, and particulate matter less than 2.5 microns in diameter ($PM_{2.5}$) concentrations would be below the thresholds for all Health Risk Assessment (HRA) exposure scenarios for off-site receptors. Thus, there are no existing off-site residences, places of employment, schools, or other land uses where people would experience health risks or $PM_{2.5}$ concentrations in excess of the Bay Area Air District (Air District) thresholds.

However, the Draft EIR did identify a significant and unavoidable impact for future on-site receptors, which would occur for two potential HRA exposure scenarios and for cancer risk- and $PM_{2.5}$-related impacts. These impacts would occur only for future residents and workers at the project site and would not occur for any people living or working outside of the project site. Even with mitigation, the impact would be significant. Mitigation Measure AQ-3-A from the Draft EIR requires the project applicant to install Minimum Efficiency Reporting Value (MERV) 13 air filters or equivalent in new residential units built at the project site. As stated in the Draft EIR, the effectiveness of this measure is difficult to quantify, because the heating, ventilation, and air conditioning (HVAC) system must be running for the filters to work, and because residents may be exposed to outdoor air if windows are open or they are spending time outside of their units. Therefore, no reduction in exposure was assumed in the modeling and the impact was conservatively determined to be significant and unavoidable.

The California Environmental Quality Act (CEQA) requires mitigation only for impacts that are significant (CEQA Guidelines Section 15126.4(a)(1)). Commenters have requested that the City of San Bruno (City) or project sponsor provide off-site residents with High-Efficiency Particulate Air (HEPA) air purifiers, indoor and/or outdoor air pollution monitors, N95 masks, air quality education, and financial compensation. Because no significant and unavoidable impacts have been

identified for existing, off-site receptors, no additional mitigation measures are required under CEQA.

Further, based on the Draft EIR findings, the project applicant would be required to implement mitigation measures to reduce regional criteria pollutant emissions at the source; for example, Mitigation Measure AQ-2-A requires use of clean diesel-powered construction equipment, and Mitigation Measure AQ-2-B requires best management practices to minimize dust. These measures would also serve to reduce already less-than-significant localized impacts on existing, off-site receptors. These measures would reduce emissions at the source of emission, which is the most beneficial and efficient way to mitigate impacts rather than mitigating impacts at individual receptors (i.e., through HEPA filters).

The regional criteria pollutant mitigation measures identified in the Draft EIR were assumed for the HRA, and with those measures, health-risk impacts to off-site receptors would be less than significant, as shown in Draft EIR Table 3.1-12; consequently, further mitigation is not required. With respect to the Draft EIR's adequacy, Section 3.1, *Air Quality*, has thoroughly evaluated and identified significant impacts and presented mitigation measures to reduce those impacts where feasible. At off-site locations, impacts are less than significant and no additional mitigation measures are required.

Some commenters have noted that certain census tracts in the vicinity of the project site are overburdened from existing pollution sources. In the Draft EIR, existing pollution sources are accounted for in the analysis of cumulative impacts (Chapter 5, *Other CEQA Considerations*). The results of the cumulative air quality analysis are shown in Table 5-2, which includes health risk and $PM_{2.5}$ concentration results from existing stationary sources, roadway sources, and rail sources in the project area. These results are based on location-specific modeling conducted by the Air District and thus reflect the existing pollution sources that were alluded to by commenters. As noted on page 5-25 of the Draft EIR, the cumulative health-risk impacts would be less than significant, because the total health risks and $PM_{2.5}$ concentrations from existing sources and the project would be less than the Air District's cumulative-specific thresholds. Thus, even if some census tracts in the project area have higher-than-average pollution burdens, site-specific modeling conducted in the Draft EIR shows that the cumulative effect of the project and existing pollution sources would not be significant under the Air District's thresholds.

2.1.1.2 Master Response 2 (ALUCP Compatibility and Impacts)

Comments were raised about the project's consistency with the San Francisco International Airport (SFO) Airport Land Use Compatibility Plan (ALUCP) and potential environmental impacts that could result from perceived inconsistencies. Specifically, comments were received related to the project's proposed placement of residential uses in the 70 A-weighted decibel (dBA) Community Noise Equivalent Level (CNEL) contour, and noise impacts that could result. Comments were also received regarding air hazards, including the potential of landscaping to attract birds, thereby increasing bird strike potential by aircraft, in addition to airspace hazards caused by building and equipment heights at the project site. This master response summarizes the Draft EIR's analysis related to SFO ALUCP consistency and responds to the individual comments received.

Proposed Project Approvals Related to the ALUCP

ALUCP consistency is considered and addressed throughout the EIR. As described in Section 2.7, *Required Project Approvals*, the project requires an override of an Airport Land Use Commission inconsistency determination for residential uses. The project description in the Draft EIR provides additional detail behind the need for this override on page 2-8.

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

Hazards

ALUCP Consistency

The Draft EIR discusses the project's consistency with the ALUCP in terms of hazards to aircraft and to people on the ground. Starting on page 3.7-25, the Draft EIR states the following (footnote omitted).

> [T]he ALUCP identifies five Safety Compatibility Zones in the vicinity of SFO. As shown in Figure 3.7-1, *ALUCP Safety Compatibility Zones*, the majority of the project site is within Safety Zone 4, the Outer Approach/Departure Zone. Incompatible uses within Safety Zone 4 include large child day care centers, BSL 3 and 4 facilities, and children's schools. The proposed P-D zoning would not allow for the development of large child day care centers, BSL 4 facilities, or children's schools anywhere on the site. BSL-3 laboratories would only be allowed within the small portion of the project site that is outside Safety Zone 4. Uses to be avoided in Safety Zone 4 include hazardous uses other than BSL 3 and 4 facilities (which include BSL 1 and 2 facilities) and critical public utilities. Such uses are determined to be "not incompatible" but are classified as uses that should be avoided "unless no feasible alternative is available." In addition, the safety

---

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

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

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

compatibility criteria state that where such uses are allowed, habitable structures shall be provided with at least 50 percent more exits than required by applicable codes. Where the 50 percent factor results in a fraction, the number of additional exits shall be rounded to the next highest whole number. The project does not propose critical public utilities. BSL 1 and 2 facilities would be allowed throughout the project site, including in Safety Zone 4. BSL 1 and 2 facilities in Safety Zone 4 would be required under the P-D zoning to provide exits in accordance with ALUCP requirements. As such, the project would be consistent with the ALUCP's Safety Compatibility Policies SP-1 and SP-2.

Environmental Impacts

Bird Strike

As it relates to compatibility with ALUCP safety policies, the EIR evaluates the potential for increased bird strike hazards and concludes that impacts would be less than significant. CEQA requires mitigation only for impacts that are significant (CEQA Guidelines Section 15126.4(a)(1)). The conclusion that impacts would be less than significant is supported by substantial evidence in the EIR. The Draft EIR states the following on page 3.7-26.

> As discussed in Section 2.6.4, *Landscape and Trees*, in Chapter 2, *Project Description*, the project would remove approximately 114 trees and plant approximately 475 trees, for a net increase of 361 trees on the project site. The increased landscaping could potentially attract more birds to the project site, which could in turn increase the potential for aircraft-involved bird strike due to the project site's proximity to SFO. However, as described in Section 3.2 *Biological Resources*, the project site and surrounding area are fully developed and do not connect directly to areas of natural open space. Given that the area surrounding the project site is heavily urbanized, large numbers of birds are not expected to be flying over the project site for substantial bird strikes to occur. While more birds may be present on the site compared to existing conditions, given the heavily urbanized nature of the area, the introduction of more trees is unlikely to substantially change the existing bird population dynamics and flight patterns. ALUCP Policy AP-4 states that land uses that attract large flocks of birds can result in increased risks related to aircraft-involved bird strike. Examples include waste disposal sites and wetlands. The project does not propose these or any other type of use that would be expected to attract large flocks of birds. The ALUCP (p. 289) also states that "[s]pecies most commonly associated with aircraft damage include vultures, geese, cormorants and pelicans, cranes, eagles, ducks, and osprey." The ornamental trees included in the proposed landscape plan generally are not considered suitable habitat for these species and would be unlikely to attract these species to the project site. Furthermore, historical data show that bird strikes at SFO are relatively rare, and bird strikes causing substantial damage to aircraft are exceedingly rare. From 2020 to 2024, there were 237 incidents where birds caused minor or unspecified damage to aircraft, and no events causing substantial damage or destruction (FAA 2025). Given the high volume of flights at SFO (approximately 1,000 flights per day), this number represents a very small percentage of total flights (City and County of San Francisco n.d.). Additionally, SFO has robust wildlife management practices in place to mitigate bird strike risks. Therefore, the risk of hazards to aircraft from bird strike is considered low.

While a commenter focuses on the absolute increase in trees on the project site and the potential impacts of birds on aircraft if ingested, it is also important to consider the size and behavior of bird species and characteristics of the surrounding environment when determining risk level. These aspects are considered in the Draft EIR when it explains that:

- The project site is not connected to areas of natural open space, such that large numbers of birds are not expected to be flying over the project site.

- The proposed project does not include features that tend to attract large flocks of birds that increase bird strike risk.
- Ornamental trees are generally not suitable habitat for species that pose the largest bird strike risk and are, therefore, not likely to attract those species to the project site.

To further articulate these points, the kinds of species expected to nest in ornamental trees would instead include house finches, house sparrows, and other small birds that are accustomed to humans and would not be attracted to the Bay or airport area for foraging. Additionally, Federal Aviation Administration (FAA) Advisory Circular 150/5200-33C, Hazardous Wildlife Attractants on or near Airports (FAA 2020), provides guidance on landscaping and landscape maintenance. As it relates to land uses outside of the airport, a concern is collective creation of a wildlife corridor through the airport or surrounding airspace. However, the proposed project would not create additional open space that would create a continuous corridor. Therefore, the conclusion that impacts related to potential aircraft bird strike hazards would be less than significant is supported by substantial evidence, and no revisions to the Draft EIR are required. Notwithstanding, Mitigation Measure HAZ-5 has been revised in Chapter 3, *Revisions to the Draft EIR*, to include additional requirements for landscape evaluation at the project site by a qualified biologist.

Building Heights

The Draft EIR also evaluates the potential for airspace-related hazards resulting from building heights and tall construction equipment—namely, cranes. The Draft EIR states the following on page 3.7-25 (with revisions made in Chapter 3, *Revisions to the Draft EIR*, shown in underline/strikeout).

> In general, height limitations and restrictions in the area are defined by the SFO Airport Influence Area. According to the 2012 SFO ALUCP, notification and consultation with the FAA under CFR Part 77.9 would be required for implementation of the project. Building heights under the project would be subject to maximum height limits in accordance with the FAA and SFO ALUCP Land Use Compatibility Plan requirements; maximum heights would depend on the applicable height contours under these regulations. As mentioned previously, the ground elevation at the project site ranges from ~~36~~ 43 to ~~66~~ 61 feet AMSL NAVD88. Assuming ground elevations do not change, the heights of the proposed buildings (i.e., critical aeronautical surfaces) could be no higher than approximately ~~55~~ 74 and ~~90~~ 105 feet above ground level to be compatible with the SFO ALUCP (equivalent to ~~125~~ 127 to ~~145~~ 148 feet AMSL). Such compatibility would also be contingent on the issuance of a Determination of No Hazard from the FAA for any proposed structures and determinations from C/CAG as the designated ALUC. As shown in Figure 2-10 in Chapter 2, *Project Description*, proposed building heights would range from 20 to 80 feet above ground level, depending on the location within the project site. The use of construction equipment (such as building cranes) or the construction of buildings with heights in excess of ~~55~~ 74 feet above ground level could also pose a safety hazard to construction workers and future residents. **Mitigation Measure HAZ-5** requires the applicant to submit a plan with a list of equipment to be used during construction that includes their height and proposed area of operation to the City for review and approval. The mitigation measure also requires compliance with SFO building height requirements. Mitigation Measure HAZ-5 supersedes Mitigation Measure HAZ-5.1 in the Housing Element Initial Study/Mitigated Negative Declaration (IS/MND) and is equally as effective in mitigating impacts on aviation safety at the project site. With issuance of a Determination of No Hazard from the FAA, and compliance with **Mitigation Measure HAZ-5**, project construction and operation would comply with SFO ALUCP safety guidelines and would not pose a risk to aviation safety.

A commenter asserts that temporary equipment that exceeds any height limitations would never be allowed by the FAA, implying that Mitigation Measure HAZ-5 is infeasible. The FAA is tasked with promoting the "safe and efficient use of navigable airspace."[5] To achieve this, the FAA has the authority to regulate or control how real property may be used in regard to objects that may penetrate the navigable airspace[6] under 14 Code of Federal Regulations (CFR) Part 77. The requirements outlined in 14 CFR Part 77 are supplemented by FAA Joint Order 7400.2, which outlines the process for conducting the aeronautical study process and prescribes the policy, criteria, guidelines and procedures for various FAA services and offices involved in managing the National Airspace System.

Temporary construction equipment, such as cranes, often exceeds the height of the permanent structure they are used to construct. For temporary structures, obstruction evaluation notices are processed similarly to those for permanent structures, but with special consideration due to their short-term nature. The FAA encourages reasonable adjustments to both aeronautical operations and the temporary structure to ensure safety while supporting construction needs. Specifically, the FAA outlines several recommended actions that include: coordinating with airport managers to temporarily close or adjust runways and taxiways; negotiating with equipment operators to lower machinery during poor weather or critical flight operations; controlling construction vehicle traffic on airport grounds; adjusting instrument flight rules procedures or minimum altitudes when feasible; and ensuring that equipment is properly marked and lighted when necessary.[7]

While Determinations of No Hazard for permanent structures typically contain the provision that the favorable determination includes the use of temporary construction equipment up to the approved permanent structure's height[8], any temporary construction equipment exceeding that height is subject to its own aeronautical study. Therefore, where a favorable determination is issued by the FAA for temporary construction equipment, the possible adverse impacts have been extensively studied by the FAA's obstruction evaluation group. Moreover, if a structure is determined to be a hazard to aviation, it cannot be permitted regardless of its duration.

As shown in Final EIR Figure 2-1, *Temporary Crane Filings*, there have been numerous instances where the FAA has issued favorable determinations for temporary construction equipment that breach the obstruction surfaces outlined in 14 CFR Part 77.17 as well as critical airspace. The position that temporary construction equipment exceeding obstruction standards or critical surfaces will categorically be denied by the FAA does not reflect the FAA's actual regulatory framework or historical precedent. The FAA routinely conducts thorough aeronautical studies for such equipment and has issued favorable determinations even when proposed heights exceed the thresholds outlined in 14 CFR Part 77.17 (Capitol Airspace Group 2025). These standards are not absolute barriers but rather serve as triggers for further evaluation. Therefore, when a favorable determination is issued, it reflects a comprehensive safety analysis and a balanced approach to both aviation and development needs, and is consistent with Mitigation Measure HAZ-5, which will ensure that FAA approvals are obtained prior to issuance of construction or building permits.

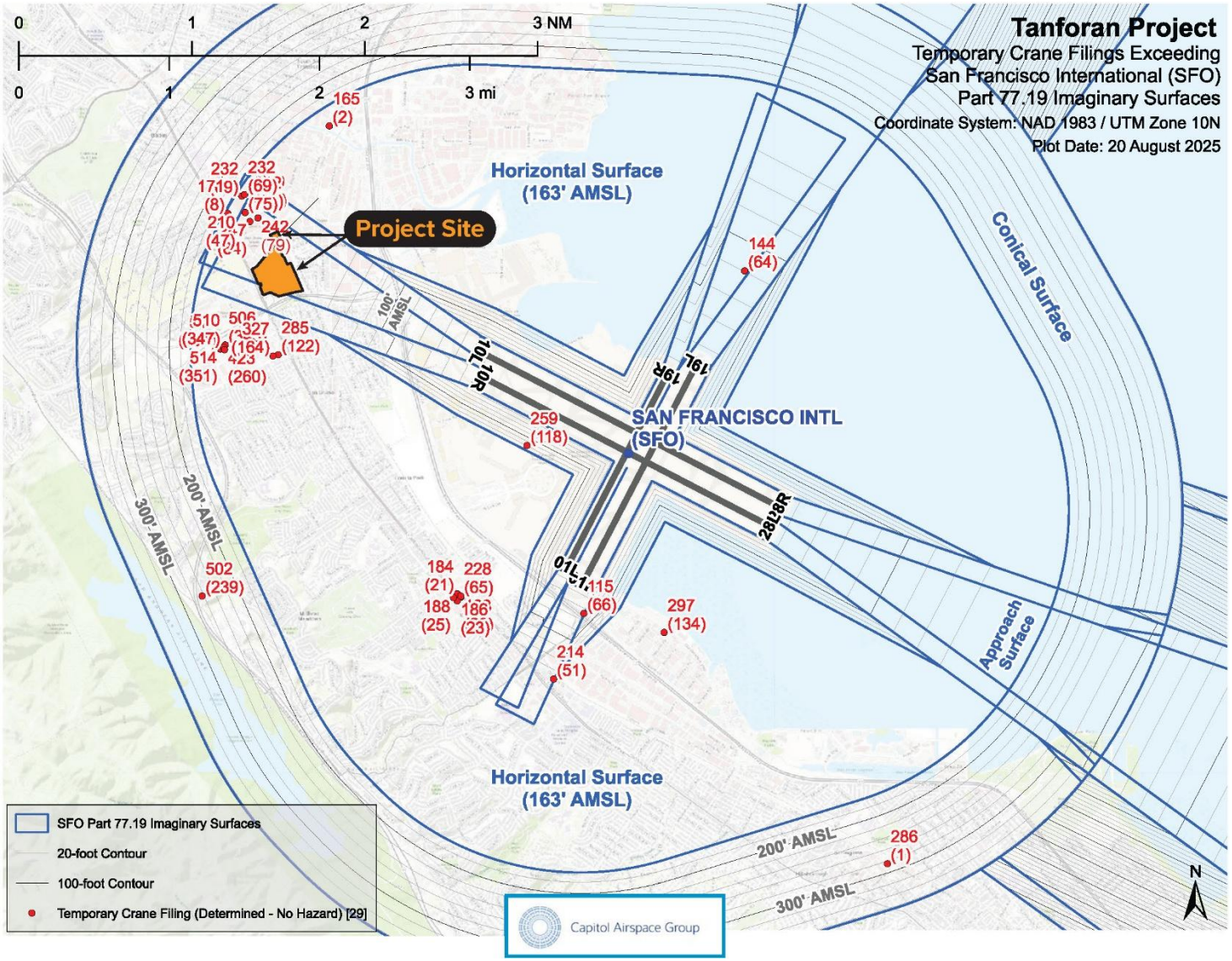
---

5 49 U.S.C. § 44817(a)(2); *see also* 49 U.S.C. § 40103(b)(1).

6 *See* 49 USC § 40102(a)(32) ("navigable airspace" means airspace above the minimum altitudes of flight prescribed by regulations under this subpart and subpart III of this part, including airspace needed to ensure safety in the takeoff and landing of aircraft").

7 FAA Joint Order 7400.2R, 6-3-12(a).

8 *See e.g.,* "This determination does include temporary construction equipment, such as cranes, derricks, etc., which may be used during the actual construction of the structure. However, this equipment must not exceed the overall heights as indicated above. Equipment which has a height greater than the studied structure requires separate notice to the FAA."



Source: Capitol Airspace Group 2025

FEIR Figure 2-1. Temporary Crane Filings

Noise

ALUCP Consistency

The Draft EIR acknowledges that the proposed project is inconsistent with ALUCP Policy NP-4 due to the location of the site within the 70 dBA CNEL contour, as discussed on page 3.10-46. However, a conflict with a plan in and of itself is not considered an environmental impact; rather, an EIR must evaluate whether there are any significant environmental impacts caused by a conflict with a plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The *Final Statement of Reasons for Regulatory Action, Amendments to the State CEQA Guidelines* (California Natural Resources Agency 2018) discusses conflicts with plans in the context of certain land use plans:

> [T]he Agency clarified that the focus of the analysis should not be on the "conflict" with the plan, but instead, on any adverse environmental impact that might result from a conflict. For example, destruction of habitat that results from development in conflict with a habitat conservation plan might lead to a significant environmental impact. The focus, however, should be on the impact on the environment, not on the conflict with the plan.

Therefore, the EIR complies with the need to disclose conflicts with plans, and properly analyzes whether those conflicts cause a significant environmental impact. A conflict with the ALUCP in and of itself is not a significant environmental impact under CEQA. The discussion of the potential environmental impacts caused by a plan conflict within the EIR is provided here.

Environmental Impacts

A lead agency has the discretion to determine appropriate thresholds of significance for impacts considered in an EIR (CEQA Guidelines § 15064.7(b)).

Regarding evaluation of airport noise impacts within an ALUCP boundary, Public Resources Code Section 21096(a) states the following regarding evaluation of noise within an ALUCP boundary:

> If a lead agency prepares an environmental impact report for a project situated within airport land use compatibility plan boundaries ... the Airport Land Use Planning Handbook published by the Division of Aeronautics of the Department of Transportation ... shall be utilized as technical resources to assist in the preparation of the environmental impact report as the report relates to airport-related safety hazards and noise problems.

The Airport Land Use Planning Handbook referred to in Public Resources Code Section 21096(a) contains guidance in Chapter 6 related to CEQA and ALUCP review of local actions that reiterates this statutory guidance. In an appended Sample CEQA Initial Study Checklist (Appendix I), guidance states that "The analysis should focus on the noise compatibility criteria of the proposed ALUCP. As with safety. .. , the desired outcome of the ALUCP process is to reduce impacts to sensitive receptors." The handbook also contains guidance on formulating noise contours and policies for ALUCPs. However, there are no mandatory noise thresholds provided via the handbook.

As applied in the EIR, the threshold used for airport noise impacts on future residential receptors at the project site (Impact NOI-3) is 45 dB CNEL in the interior of residences. This threshold is derived

from the ALUCP itself. Specifically, Table IV-I states that residential land uses exposed to noise levels of 65 to 70 dBA CNEL would be considered conditionally acceptable. This footnote states:

> Land use and related structures are permitted, provided that sound insulation is provided to reduce interior noise levels from exterior sources to CNEL 45 dB or lower and that an avigation easement is granted to the City and County of San Francisco as operator of SFO. See Policy NP-3.

Therefore, this table implies that interior noise levels of 45A dBA or less are acceptable for new residential uses. In addition, Policy NP-4.1 of the ALUCP states that residential uses are allowed in areas exposed to noise above 70 dBA CNEL if the proposed use is on a lot of record zoned exclusively for residential use as of the effective date of the ALUCP, and if the residential use is sound-insulated to achieve an indoor noise level of CNEL 45 dB or less from exterior sources. This is another instance of the ALUCP indicating that interior noise levels of 45 dB or less are acceptable for new residential land uses.

The City, in applying this threshold, has determined that the threshold is when windows are closed. The FAA's Advisory Circular on Guidelines for Sound Insulation of Structures Exposed to Aircraft Noise states that, for determining the interior noise level, "A noise-impacted structure must have interior noise levels that are DNL/CNEL 45 dB or greater with the windows closed to be considered non-compatible" (footnote omitted). Additionally, SFO's Noise Insulation Program (NIP), which provides acoustical improvements to residences that are within the ALUCP's 65-dB noise contour, installs windows that can be opened (SFO 2020b). This indicates the 45 dB CNEL standard should be applied with windows closed and should not consider interior noise levels when windows are open. The EIR's approach, therefore, provides the City with substantial evidence to determine the significance of airport noise impacts on future residents of the proposed project.

Related to the effectiveness of Mitigation Measure NOI-3, it would be speculative to conclude that noise insulation and other noise-reduction measures listed in Mitigation Measure NOI-3 would lose effectiveness over time to the point that retrofit would be needed. While SFO has indicated that its NIP projects have involved the replacement of previously installed sound insulation, the NIP is distinguishable because it is limited to existing single-family homes (SFO 2025). Here, however, the proposed project is an entirely new build of multi-family residential buildings with sound-reducing design included in the buildings according to Mitigation Measure NOI-3. These buildings would be constructed with a planned approach to noise control that considers all affected building elements and the entire building envelope, including windows, doors, walls, roofs, attics, ventilation, and insulation. This approach would result in more robust construction with each element properly installed per manufacturer's instruction. The project would also use newer higher-quality acoustical products that were unavailable during earlier retrofit projects (such as NIP programs). For instance, doors used to be replaced within the existing frame, or the door and frame were installed separately. In contrast, modern construction uses prehung doors so that the entire door assembly (including the frame, threshold, and seals) is integrated. Similarly, modern sound-rated windows come with integrated frames and seals. These newer products, along with updated installation guidance developed by manufacturers over several decades of product installation, all serve to increase the performance and longevity of the products available for new construction. In addition, aircraft noise levels have been substantially reduced over time such that SFO is quieter than it has been since 1975 (SFO 2023). Ongoing U.S. and international initiatives will likely continue this trend in the future. The FAA maintains its Continuous Lower Energy, Emissions, and Noise (CLEEN) program, and the International Civil Aviation Organization reached an agreement requiring future aircraft to be at least 6 decibels quieter than current (2025) models as of 2029.

CEQA Guidelines Section 15145 states that, "[i]f, after thorough investigation, a Lead Agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact." For the reasons described here, SFO's experience with the NIP programs is not instructive for how the project's noise insulation features are likely to perform. To the contrary, the project's noise insulation features are likely to outperform those installed on older single-family homes as part of the NIP program. Therefore, the potential for insulation to fail over time resulting in a noise impact is speculative and is not discussed further.

Notwithstanding the adequacy of the Draft EIR, as shown in Chapter 3, *Revisions to the Draft EIR*, Mitigation Measure NOI-3 has been revised to clarify the threshold of 45 dB CNEL, and require provisions to ensure ongoing efficacy of noise-reducing features and materials.

Consideration of Off-Site Alternative Locations

CEQA provides guidance regarding consideration of alternative locations for a proposed project. Pertinent to this EIR, CEQA Guidelines Section 15126.6(f)(2)(B) states that, "If the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion and should include the reasons in the EIR."

The City has included such a discussion in Draft EIR Section 4.2.1, *Off-Site Alternative*:

> The Off-Site Alternative was rejected as infeasible because it would not meet the fundamental purpose of the Tanforan Redevelopment Project and would not redevelop and revitalize the Shops at Tanforan site, take advantage of the transit resources in the area, or increase the city of San Bruno's housing supply in support of its Regional Housing Needs Allocation (RHNA) obligations. The project site is included as housing opportunity Site 20 in the Housing Element, the largest opportunity site identified to provide the housing necessary to meet the City's [RHNA] obligations.[9] The Housing Element assumed that a minimum of 1,002 housing units would be included at the project site and as part of the Housing Element's implementation, the City amended the General Plan and rezoned a portion of the project site to allow for multi-family residential uses. Thus, developing the project on this specific site fulfills citywide planning initiatives already identified in the Housing Element. Furthermore, there are no other vacant or underutilized sites within the city that could accommodate the type and scale of redevelopment envisioned for the project site, which is why the project site was identified as the largest housing opportunity site in the Housing Element. Therefore, the Off-Site Alternative would hinder the City's ability to meet its RHNA obligations in accordance with State housing law. For these reasons, the Off-Site Alternative was rejected from further consideration.

While other locations are suggested in comments (e.g., Bayhill Specific Plan and the transit-oriented development corridor along El Camino Real and San Mateo Avenue), these other locations also would not meet the fundamental purpose of the Tanforan Redevelopment Project and would not redevelop and revitalize the Shops at Tanforan site. Further, the project site is already zoned for the development of up to 1,000 residential dwelling units. The City has appropriately considered off-site alternatives and dismissed them as infeasible, consistent with CEQA requirements. No additional off-site alternatives need to be considered.

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

2.1.2 Individual Responses to Comments

This section provides the responses to comments received on the Draft EIR.

U.S. Department
of Transportation
**Federal Aviation
Administration**

Western-Pacific Region
Office of the Regional Administrator

777 S. Aviation Blvd. Suite 150
El Segundo, CA 90245

August 11, 2025

Mr. Peter Gilli
City of San Bruno
Community Development Department
567 El Camino Real
San Bruno, CA 94066

via email: Tanforan@sanbruno.ca.gov

Subject: NOA Comments: Draft Environmental Impact Report (EIR) for the proposed Tanforan Redevelopment Project

Dear Mr. Gilli:

Thank you for the opportunity to review and comment on the City of San Bruno's Draft EIR issued on June 27, 2025 for the proposed Tanforan Redevelopment Project. The proposed project would redevelop the Shops at Tanforan Shopping Center and a parcel north of Sneath Lane to a mixed-use development including residential housing, retail, laboratory and office uses, open space, and a potential hotel. The programmed area would include between 1,000 and 1,514 residential units and between 2,169,041 to 2,330,461 square feet of new development.

The proposed project is located on approximately 44 acres situated approximately 1 mile northwest of the San Francisco International Airport (SFO). SFO is a Commercial Service - Large Hub airport within the FAA's National Plan of Integrated Airport Systems (NPIAS). The airport and surrounding property are owned and operated by the City and County of San Francisco. SFO primary operations use Runways 28L and 28R for landing and Runways 01R and 01L for departures. In this configuration, Runway 28R is also used for departures of heavy jets on long routes because it is the longest SFO runway. The Tanforan Project area aligns approximately 1.1 nautical miles from the end of Runways 28R and 28L at SFO.

FAA's mission is to provide the safest and most efficient aerospace system in the world. We offer the following comments in support of this mission.

Airspace

Title 14 Code of Federal Regulations (CFR) Part 77, *Safe, Efficient Use, and Preservation of the Navigable Airspace*, governs the FAA's review of proposed construction exceeding certain height limits, defines airspace obstruction criteria, and provides for FAA aeronautical studies of proposed construction. Projects that have the potential to affect navigable airspace as defined in 14 CFR § 77.9 must file a Notice of Proposed Construction or Alteration (Form 7460-1) with the FAA. The Draft EIR states the proposed project includes the construction of building heights ranging from 1 to 7 stories, or 20 to 79 feet, 7 inches. Impact HAZ-5 states "SFO is approximately 0.7 mile east of the project site, as measured from the closest point on the project site to the runway. The project site is located within the Federal Aviation Regulation Part 77 sphere of influence and within the boundaries of Airport Influence Area A and B of the SFO ALUCP. As such, the compatibility criteria contained within the ALUCP are applicable to development

within the project site." Further, Impact HAZ-5 states "The use of construction equipment (such as building cranes) or the construction of buildings with heights in excess of 55 feet above ground level, depending on the location within the project site."

FAA acknowledges that Mitigation Measure HAZ-5 includes filing of Form 7460-1 for proposed building heights. However, Form 7460-1 also applies to construction equipment. Please update Mitigation Measure HAZ-5 accordingly. Additionally, due to the location and the proposed building heights, it is strongly recommended that a preliminary review be requested prior to design to ensure compatibility of the proposed project. The 7460-1 must be filed at least 45 days prior to the start of construction. Information about the Obstruction Evaluation/Airport Airspace Analysis process and the Form 7460-1 are available at https://oeaaa.faa.gov/oeaaa/external/portal.jsp.

Wildlife hazards

The majority of aircraft related bird strikes occur on approach to Runways 28L and 28R and departure from Runways 10L and 10R, which is consistent with the tidal nature of the bay in these areas. FAA Advisory Circular (AC) 150/5200-33C, *Hazardous Wildlife Attractants on or near Airports*, provides general separation criteria and recommended procedures for off-airport wildlife attractants. For SFO, FAA recommends a 10,000-foot separation distance from the nearest aircraft movement areas for any hazardous wildlife attractants (See Section 1.3 and Chapter 2).

The proposed project lies within 10,000 feet of SFO (see Enclosure 1). Impact HAZ-5 states the project would have a net increase of 361 trees on the project site, which "could potentially attract more birds to the project site, which could in turn increase the potential for aircraft-involved bird strikes due to the project site's proximity to SFO." The following sections of AC 150/5200-33C provide guidance on land uses that have the potential to attract wildlife and generally not compatible with safe airport operations within the 10,000-foot radius of an airport to protect approach, departure and circling airspace:

- Section 2.8.2, Landscaping and Landscape Maintenance.
- Section 2.8.3, Structures; and
- Section 2.8.4, Other Hazardous Wildlife Attractants.

FAA requests that Mitigation Measure HAZ-5 include measures that are consistent with the guidance provided in Chapter 2, to include review of the landscaping plan by a Qualified Airport Wildlife Biologist and notification provided to SFO to review the landscape plan for attractiveness to hazardous wildlife.

Noise, Land Use Compatibility and Residential Sound Insulation

FAA appreciates the noise analysis completed for the proposed project. The fact remains that the Project would introduce a new incompatible residential land use into an area already significantly affected by aircraft arrivals and departures from SFO. Specifically, a majority of the proposed project is within the 70 decibel (dB) Community Noise Equivalent Level (CNEL) noise contour and is heavily affected by SFO departures from Runways 28L and 28R, thus increasing noise incompatibility. Impact NOI-3 states the project would need to receive a "determination of inconsistency from ALUC and require a Local Agency Override by the San Bruno City Council" based on placing new residential uses in areas exposed to noise above the 70 dB CNEL noise contour for the airport. It continues to be FAA's position that the introduction of residential units is incompatible with SFO's Noise Compatibility Plan and 14 CFR Part 150, Airport Noise Compatibility Planning (see Enclosure 2, Appendix A, Table 1- Land Use Compatibility Guidelines).

In accordance with FAA Final Policy on Part 150 Approval of Noise Mitigation Measures: Effect on the Use of Federal Grants for Noise Mitigation Projects (63 FR 16409), structures and new non-compatible development built after October 1, 1998, are not eligible for approval of remedial noise mitigation measures under Part 150 or Airport Improvement Program (AIP) funding. Therefore, the Tanforan Project will not be eligible to receive any Part 150 or AIP funding for residential sound insulation, inclusive of the mitigation discussed under Impact NOI-3 and Mitigation Measure NOI-3. Responsibility for implementation of mitigation measures identified under Mitigation Measure NOI-3 should be disclosed in the Draft EIR. As

currently stated, this commitment only addresses that "the project applicant shall retain an acoustical engineer to conduct a noise analysis and generate a Noise Reduction Plan that determines the treatments and measures necessary to ensure interior noise levels (attributable to exterior sources) in any habitable room associated with project residences would be 45 dBA CNEL, or less." The responsibility for this mitigation falls wholly upon the project applicant and/or City. Additionally, all noise complaints received by FAA will be directed to the City of San Bruno for response.

We also take this opportunity to remind the City and County of San Francisco of its federal agreement obligations related to compatible land uses. Specifically, federal grant assurance 21 mandates that the Airport Sponsor take appropriate action, to the extent reasonable, including the adoption of zoning laws, to restrict the use of land adjacent to or in the immediate vicinity of the airport to activities and purposes compatible with normal airport operations, including landing and takeoff of aircraft.

Your attention to these comments is appreciated. If you have any questions, please contact my office at (424) 405-7000.

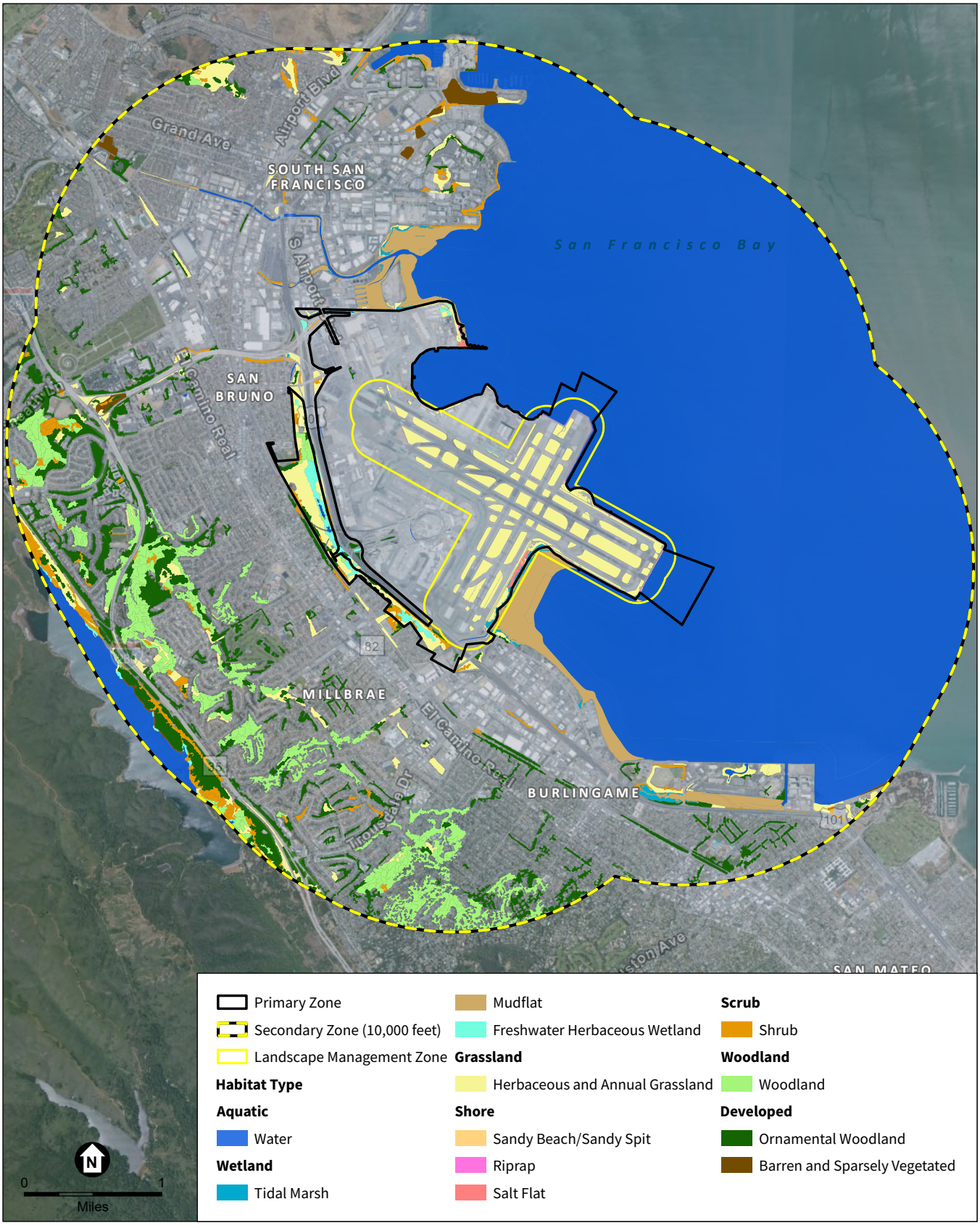
Sincerely,



Raquel Girvin
Regional Administrator

Enclosures

cc:
Terry O'Connell, Roundtable Vice-Chairperson, San Francisco
Tom Hamilton, Council Member, City of San Bruno
Andrew Fermier, Executive Director, Association of Bay Area Governments
United States Representative Kevin Mullin, CA – 15th District
Tarek Tabshouri, Director, Aeronautics Program, Caltrans
Mike Nakornkhet, Director, San Francisco International Airport



SOURCE: San Mateo County, 2018; SFO, 2025; ESA, 2025

SFO Wildlife Hazard Management

FIGURE 4-2
SFO SECONDARY ZONE LANDCOVER TYPES

TABLE 1—LAND USE COMPATIBILITY WITH YEARLY DAY-NIGHT AVERAGE SOUND

Land Use	Yearly day-night average sound level (L_{dn}) in decibels					
	< 65	65-70	70-75	75-80	80-85	> 85
Residential						
Residential, other than mobile homes and transient lodgings	Y	N (1)	N (1)	N	N	N
Mobile home parks	Y	N	N	N	N	N
Transient lodgings	Y	N (1)	N (1)	N (1)	N	N
Public Use						
Schools	Y	N (1)	N (1)	N	N	N
Hospitals, nursing homes	Y	25	30	N	N	N
Churches, auditoriums, and concert halls	Y	25	30	N	N	N
Government services	Y	Y	25	30	N	N
Transportation	Y	Y	Y (2)	Y (3)	Y (4)	Y (4)
Parking	Y	Y	Y (2)	Y (3)	Y (4)	N
Commercial Use						
Offices, business and professional	Y	Y	25	30	N	N
Wholesale and retail- building materials, hardware and farm equipment	Y	Y	Y (2)	Y (3)	Y (4)	N
Retail trade-general	Y	Y	25	30	N	N
Utilities	Y	Y	Y (2)	Y (3)	Y (4)	N
Communication	Y	Y	25	30	N	N
Manufacturing and Production						
Manufacturing, general	Y	Y	Y (2)	Y (3)	Y (4)	N
Photographic and optical	Y	Y	25	30	N	N
Agriculture (except livestock) and forestry	Y	Y (6)	Y (7)	Y (8)	Y (8)	Y (8)
Livestock farming and breeding	Y	Y (6)	Y (7)	N	N	N
Mining and fishing, resource production and extraction	Y	Y	Y	Y	Y	Y
Recreational						
Outdoor sports arenas and spectator sports	Y	Y (5)	Y (5)	N	N	N
Outdoor music shells, amphitheaters	Y	N	N	N	N	N
Nature exhibits and zoos	Y	Y	N	N	N	N
Amusements, parks, resorts, and camps	Y	Y	Y	N	N	N
Golf courses, riding stables and water recreation	Y	Y	25	30	N	N

Numbers in parenthesis refer to notes; see continuation of Table 1 for notes and key.

The designations contained in this table do not constitute a Federal determination that any use of land covered by the program is acceptable or unacceptable under Federal, State, or local law. The responsibility for determining the acceptable and permissible land uses and the relationship between specific properties and specific noise contours rests with the local authorities. FAA determinations under Part 150 are not intended to substitute Federally determined land uses for those determined to be appropriate by local authorities in response to locally determined needs and values in achieving noise compatible land uses.

(more)

TABLE 1—LAND USE COMPATIBILITY WITH YEARLY DAY-NIGHT AVERAGE SOUND LEVELS (CONTINUED)

Key to Table 1	
Y (YES)	Land Use and related structures compatible without restrictions.
N (NO)	Land Use and related structures are not compatible and should be prohibited.
NLR	Noise Level Reduction (outdoor to indoor) to be achieved through incorporation of noise attenuation into the design and construction of the structure.
25, 30, or 35	Land use and related structures generally compatible; measures to achieve NLR of 25, 30 or 35 dB must be incorporated into design and construction of structure.
Notes for Table 1	
(1)	Where the community determines that residential or school uses must be allowed, measures to achieve outdoor to indoor Noise Level Reduction (NLR) of at least 25 dB and 30 dB should be incorporated into building codes and be considered in individual approvals. Normal residential construction can be expected to provide a NLR of 20 dB, thus, the reduction requirements are often stated as 5, 10 or 15 dB over standard construction and normally assume mechanical ventilation and closed windows year round. However, the use of NLR criteria will not eliminate outdoor noise problems.
(2)	Measures to achieve NLR of 25 dB must be incorporated into the design and construction of portions of these buildings where the public is received, office areas, noise sensitive areas or where the normal noise level is low.
(3)	Measures to achieve NLR of 30 dB must be incorporated into the design and construction of portions of these buildings where the public is received, office areas, noise sensitive areas or where the normal noise level is low.
(4)	Measures to achieve NLR of 35 dB must be incorporated into the design and construction of portions of these buildings where the public is received, office areas, noise sensitive areas or where the normal noise level is low.
(5)	Land use compatible provided special sound reinforcement systems are installed.
(6)	Residential buildings require an NLR of 25.
(7)	Residential buildings require an NLR of 30.
(8)	Residential buildings not permitted.
(end of Table 1)	

California Department of Transportation

DISTRICT 4
OFFICE OF REGIONAL AND COMMUNITY PLANNING
P.O. BOX 23660, MS–10D | OAKLAND, CA 94623-0660
www.dot.ca.gov

August 6, 2025

SCH #: 2023120409
GTS #: 04-SM-2023-00701
GTS ID: 31542
Co/Rt/Pm: SM/82/19.186

Peter Gilli, Community Development Director
City of San Bruno
567 El Camino Real
San Bruno, CA 94066

Re: Tanforan Redevelopment Project — Draft Environmental Impact Report (DEIR)

Dear Peter Gilli:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Tanforan Redevelopment Project. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities. The following comments are based on our review of the June 2025 DEIR.

Please note this correspondence does not indicate an official position or approval by Caltrans on this project and is for informational purposes only.

Project Understanding
The proposed project would demolish 785,489 square feet (s.f.) of existing retail uses to construct new residential and commercial uses on the 44-acre project site. Proposed new development includes approximately 111,950 to 211,950 s.f. of new retail space, between 1,014 to 1,514 multi-family residential units, 1,174,000 to 1,723,580 s.f. of life-science laboratory and office uses, a 125,000 s.f. 170-room hotel, as well as associated parking structures and amenity uses. The project site is located directly adjacent to State Route (SR) 82 and Interstate (I-) 380.

Travel Demand Analysis
The project Vehicle Miles Traveled (VMT) analysis and significance determination are undertaken in a manner consistent with the Office of Land Use and Climate Innovation's (LCI) Technical Advisory. Per the DEIR, this project is consistent with LCI screening criteria for a transit-oriented project and was therefore presumed to have a less than significant VMT impact. However, it is stated in the *Appendix 3.14-1*

Transportation Analysis Summary that expected vehicular trip generation for both project scenarios would exceed the estimated existing Tanforan Mall vehicular trip generation, which represents a net increase in vehicle trips. Related to this, the *Appendix 3.14-2 Level of Service Memorandum* also concludes that level of service (LOS) and vehicle delay will worsen at the I-380 ramps at SR 82 and the U.S. Route 101 (US-101) ramps at San Bruno Ave with the addition of project vehicle trips.

Although these results account for site internal trip matching that can be expected with mixed land uses, they do not account for potential further trip reductions from implementing transportation demand management (TDM) measures that could further reduce VMT and project vehicle trips distributed onto the surrounding roadway network. In accordance with the City/County Association of Governments of San Mateo County (C/CAG) requirements for transit-oriented developments, the project will be required to implement a TDM program designed to meet a 25 percent reduction in vehicle trips. Depending on the amount of TDM measures in place, however, the project may still result in a net increase of trips over those generated by the existing Tanforan Mall.

Given these factors, the City of San Bruno should consider TDM requirements and incentives for the future developer(s) that could further reduce project VMT and vehicle trips, such as employer-sponsored ridesharing, vanpools, priced workplace parking, and parking cashout; and residential measures such as limiting provided parking supply, unbundled parking costs from property cost, and provision of transit passes to residents and on-site employees. These and many more measures are detailed in the 2023 Caltrans Transportation Demand Management Toolbox (*link*). Limiting parking supply should be considered, given the substantial onsite parking supply proposed under both project development scenarios (up to 6,221 stalls in Scenario A, which is acknowledged to be below City minimum parking requirements) and the project site's adjacency to the San Bruno BART Station.

Proposed mitigation measures should also be documented with annual monitoring reports to demonstrate effectiveness.

Fair Share Contributions
We encourage a sufficient allocation of fair share contributions toward multi-modal and regional transit improvements to fully mitigate cumulative impacts to regional transportation. We also strongly support measures to increase sustainable mode shares, thereby reducing VMT.

The City may also consider encouraging fair share contributions from future development projects to multimodal projects that promote mode shift and reduce single-occupancy vehicle travel to mitigate VMT impacts. Caltrans suggests the following projects for future fair share contribution considerations:

Corridor & Interchange Improvements on I-380 (Plan Bay Area 2050 (PBA 2050) Regional Transportation Plan (RTP) Project 21-T06-018)	This programmed project includes funding to implement interchange improvements at US-101 and El Camino Real and a new eastbound freeway lane between I-280 and El Camino Real.
San Mateo 101 Managed Lanes Project North of I-380 (PBA 2050 RTP Project 21-T-12-116)	This is a managed lane facility project for US-101 from 1 mile south of the US-101 and I-380 separation to the San Mateo/San Francisco County line. Project sponsors include San Mateo County Transportation Authority and C/CAG. The project is currently in Project Approval and Environmental Document (PA/ED) phase with construction anticipated by December 2028.
US-101 and San Bruno Avenue Interchange Improvements	This project would reconfigure the partial cloverleaf to a compact diamond layout. The project also includes a proposed free-flow right turn lane onto I-380, bypassing the tight signalized intersection. This project is currently in the project initiation phase.

Bicycle and Pedestrian Planning
Please review and include reference to the *Caltrans Bay Area 4 Bike Plan Update* (2025) in *Chapter 3.14 Transportation* of the DEIR. This plan studied existing conditions for biking along and across the State Transportation Network (STN) in the nine-county Bay Area and developed a list of location-based and prioritized needs. Please ensure that *Section 3.14.2.1 Regulatory Setting* includes discussion of whether there are any conflicts between the Caltrans Bike Plan and the bicycle improvements proposed with this project. Please also clarify the type of bicycle facilities that will be provided on Seabiscuit Ave, B Street, and C Street within the project site.

Please be advised that the proposed off-site improvements for this project overlap with Caltrans project EA 04-0AA32/Project ID 0419000463. The Caltrans project includes the planned construction of a Class IV bikeway on SR 82 from Sneath Ln to Arroyo Dr. Please coordinate with Caltrans to ensure that the proposed two-way cycle track on the south side of Sneath Ln between SR 82 and Huntington Ave, as well as the lane configurations and pedestrian islands at the SR 82/Sneath Lane intersection, are compatible with the bicycle and pedestrian facilities planned under project EA 04-0AA32. Please contact Rommel Pardo, Regional Project Manager for San Mateo

County, at Rommel.Pardo@dot.ca.gov with questions or to discuss project coordination and kindly reference EA 04-0AA32 or Project ID 0419000463.

Hydrology
Please ensure that any increase in storm water runoff to State Drainage Systems or Facilities be treated, contained on project site, and metered to preconstruction levels. Any floodplain impacts must be documented and mitigated.

The proposed onsite storm drain system for the new development would have connections to the San Bruno storm drain system and the proposed project will alter the paved areas close to SR 82 in the City of San Bruno. Consequently, the development may impact the existing drainage systems at SR 82. The Office of Hydraulics would like to ensure no surface flow will get into the roadside gutter within SR 82. Please submit plan views, profiles, cross-sections, and details of all drainage facilities for review during the Encroachment Permit application stage.

Air Quality and Noise
Ambient air quality data for the project area appears to be available for the year 2024 from the California Air Resources Board (CARB) and Environmental Protection Agency (EPA). Please consider updating *Table 3.1-4 Ambient Air Quality Data for the Project Area (2021-2023)* with the 2024 data.

Under the *Carbon Monoxide* subsection of *Chapter 3.1.3.1 Thresholds of Significance*, the statement, "If the screening criteria are not met, a quantitative analysis, through site-specific dispersion modeling of project-related CO concentrations, would not be necessary," appears to be inconsistent with the referenced Bay Area Air Quality Management District (BAAQMD) screening criteria (*link*), which states, "If all screening criteria for criteria air pollutants and precursors are met by a proposed project, then the lead agency would not need to perform a detailed assessment of the project's criteria air pollutant and precursor emissions." Please consider rephrasing the statement in the DEIR for clarity.

Cultural Resources
For any construction activities within Caltrans' Right-of-Way (ROW) that take place in relation to this project, these mitigation measures shall be implemented if there is an archaeological discovery. If there is an inadvertent archaeological or burial discovery within Caltrans' ROW, please immediately contact the Caltrans Office of Cultural Resource Studies at (510) 847-1977. A staff archaeologist will evaluate the finds within one business day after contact. Caltrans requires review of any potential data recovery plans within Caltrans' ROW.

Encroachment Permit
Please be advised that any temporary or permanent work including traffic control that encroaches in, under, or over any portion of the State highway ROW requires a Caltrans-issued encroachment permit.

The Office of Encroachment Permits requires 100% complete design plans and supporting documents to review and circulate the permit application package. The review and approval of encroachment projects is managed through the Encroachment Permits Office Process (EPOP) or the Project Delivery Quality Management Assessment Process (QMAP), depending on project scope, complexity, and completeness of the application. Please use the following resources to determine the appropriate review process:

- TR-0416 Applicant's Checklist (*link*)
- Caltrans Encroachment Projects Processes – Information Video (*link*)
- Flowchart, Figure 1.2 in Section 108, Overview of the Encroachment Review Process, of Chapter 100 – The Permit Function, Caltrans Encroachment Permit Manual (*link*)

The permit approval typically takes less than 60 days, but may take longer depending on the project scope, size, complexity, completeness, compliance with applicable laws, standards, policies, and quality of the permit package submitted. Projects requiring exceptions to design standards, exceptions to encroachment policies, or external agency approvals may need more time to process.

To obtain more information and download the permit application, please visit Caltrans Encroachment Permits (*link*).

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Luana Chen, Transportation Planner, via LDR-D4@dot.ca.gov. For future early coordination opportunities or project referrals, please visit Caltrans LDR website (*link*) or contact LDR-D4@dot.ca.gov.

Sincerely,

Melissa Hernandez

MELISSA HERNANDEZ
Acting Branch Chief, Local Development Review
Office of Regional and Community Planning

c: State Clearinghouse

From: **Jacob Madden** <JMadden@smcgov.org>
Date: Thu, Jul 17, 2025 at 8:47 AM
Subject: Tanforan Redevelopment Project EIR comment- need for site management plan to be approved prior to ground disturbance
To: tanforan@sanbruno.ca.gov <tanforan@sanbruno.ca.gov>
Cc: Brian Gwinn <bgwinn@smcgov.org>

Dear Mr. Gilli,

Our agency will require a site management plan to be submitted and approved by our agency prior to ground disturbance. The plan is neccesary to ensure proper management and disposal of all potentially impacted media (soil, groundwater, soil vapor and air), to ensure no exposure pathways are completed as a result of the proposed development, and establish procedures for addressing any potential unknown tanks or other environmental conditions that are discovered during development. The plan should be submitted as early as possible to allow for adequate review time after the development plans are finalized. A grading permit should not be issued until the city has our agencies approval letter for the site management plan.

Thank you,

Jacob Madden, PG
Program Specialist
San Mateo County Groundwater Protection Program
(650) 399-5959 (direct)

Gmail

Lisa Costa-Sanders <lcostasanders@goodcityco.com>

Tanforan Redevelopment Project- Notice of Availability for Draft Environmental Impact Report

Wu, Elton H <EWu@sfwater.org> Tue, Jul 29, 2025 at 4:42 PM
To: Tanforan <tanforan@sanbruno.ca.gov>
Cc: "Wilson, Joanne" <jwilson@sfwater.org>, "Leung, Tracy" <TLeung@sfwater.org>, "Read, Emily" <ERead@sfwater.org>, "Rodgers, Heather" <HeRodgers@sfwater.org>, "Rando, Casey" <crando@sfwater.org>, "Feng, Stacie" <SFeng@sfwater.org>, RES <res@sfwater.org>

Hello Peter Gilli,

Thank you for the public notification regarding the Tanforan Redevelopment Project. At this time, the SFPUC does not have any comments regarding the Notice of Availability for the Draft Environmental Impact Report.

Please advise the project sponsor that the SFPUC's San Andreas Pipeline No. 1 is located adjacent to the project site within the El Camino Real public right of way. Please require that the project sponsor submit an Underground Service Alert (USA) request prior to commencing construction. If the proposed project involves digging or excavation around or near the SFPUC's pipeline, further review will be required. Please coordinate with our Land Engineering Team, Tracy Leung and Stacie Feng, who are copied on this email. This project may require further review under the SFPUC's Project Review process. Additional information regarding Project Review can be found here: https://sfpuc.org/construction-contracts/lands-rights-of-way/project-review-and-land-use-bay-area

If you have any questions or need more information, please contact me.

Thanks,

Elton Wu

Pronouns: He/ Him

Environmental Compliance and Land Planner

SFPUC Water Enterprise

Natural Resources and Lands Management Division

525 Golden Gate Avenue, 10th Floor

San Francisco, CA 94102

cell: (415) 971-7657

ewu@sfwater.org

Hetch Hetchy Regional Water System
Services of the San Francisco Public Utilities Commission

OneShoreline
Building Solutions for a Changing Climate

August 11, 2025

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

SUBJECT: DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE TANFORAN REDEVELOPMENT PROJECT (SCH # 2023120409)

Dear Mr. Gilli,

Staff at the San Mateo County Flood and Sea Level Rise Resiliency District, known as OneShoreline, have reviewed the Draft Environmental Impact Report (DEIR) for the Tanforan Redevelopment Project and offer the following comments and recommendations. Our review focused on the hydrology and stormwater management sections, with the intent of strengthening the project's long-term resilience to future storms, changing precipitation patterns, and other climate stressors.

1. Reference and Incorporate OneShoreline's Planning Policy Guidance

In 2023, OneShoreline's Board adopted our Planning Policy Guidance (PPG). The guidance is intended to be a standardized, yet evolving, resource for cities and the County to account for anticipated increases in flooding, sea level rise, and shallow groundwater rise. While we concur that the project site is located outside of OneShoreline's Map of Future Condition, we note that recommendations related to extreme storms are relevant to the project site.

Recommendation: Update Section 3.8-6 to include a description of OneShoreline's Planning Policy Guidance and reviewing the project to determine whether additional measures from the guidance could enhance the project's resilience.

2. Clarify Receiving Waters and Watershed Context

The DEIR describes the site as being within the Colma Creek watershed but also states that it is tributary to the City's stormwater system, which discharges to San Bruno Creek. However, the City's 2014 Storm Drain Master Plan does not appear to include the project site, and the figures in Appendix 3.8-1 do not clarify whether the site discharges to the Colma/South San Francisco systems or the San Bruno systems.

It is our understanding that the Sneath and Huntington lines may drain to the Colma Creek system rather than to the City's stormwater system tributary to San Bruno Creek. If flows are to Colma Creek systems, the environmental setting should be updated accordingly. If the site drains to San Bruno

Creek, please note that it may be tributary to a flood-prone area of the City and update the environmental setting, analysis, impacts, and mitigation measures as appropriate.

Recommendation: Based on clarified information, update the environmental setting in Section 3.8-6, and update the maps and narrative within Appendix 3.8-1 to communicate the regional discharge context.

3. Clarify Assumptions for Pervious Area Modeling

The DEIR models pervious areas using Green-Ampt parameters for silt loam or C-type soils. However, much of the San Bruno lowlands consist of Bay mud, artificial fill, and poorly draining soils.

Recommendation: Clarify the basis for the assumed soil parameters. If site-specific data are not available, consider conducting a sensitivity analysis using parameters more representative of Bay mud conditions, and apply conservative runoff assumptions where appropriate.

4. Design for Future Precipitation Intensities

The project's proposed stormwater design, operational considerations, and mitigation measures appear to rely on design flows from National Oceanic and Atmospheric Administration (NOAA) Atlas 14, which reflect historical rather than current or projected future conditions. However, recent studies suggest that the intensity of extreme precipitation events is likely to increase due to climate change (Mak et al., 2023[1]; Patricola et al., 2022[2]; Zhang et al., 2024[3]). For example, under the SSP5-8.5 scenario, the 24-hour, 25-year storm is projected to increase by approximately 19.4% by 2050 and 46.5% by 2100, relative to NOAA Atlas 14.

OneShoreline's Planning Policy Guidance for Resilient Public Infrastructure (June 2023) recommends that development projects be designed to accommodate future extreme storms, and the City's General Plan policies provide basis to incorporate consideration of future conditions.

Recommendation: Update the H&H analysis and associated design to reflect best-available climate science for precipitation and runoff. Assess whether proposed detention and conveyance systems can accommodate projected increases in storm intensity, especially through mid-century, and upsize infrastructure as needed to ensure long-term resilience.

---

[1] Mak, M., Neher, J., May, C., Finzi Hart, J., & Wehner, M. (2023b). San Francisco Bay Area Precipitation in Warmer World. Volume 2: Future Precipitation Intensity, Duration, and Frequency. Prepared for the City and County of San Francisco.

[2] Patricola, C. M., Wehner, M. F., Bercos-Hickey, E., Maciel, F. V., May, C., Mak, M., Yip, O., Roche, A., & Leal, S. (2022). Future Changes in Extreme Precipitation over the San Francisco Bay Area: Dependence on Atmospheric River and Extratropical Cyclone Events. Weather and Climate Extremes, 36. https://doi.org/10.1016/j.wace.2022.100440

[3] Zhang, L., Zhao, Y., Cheng, T. F., & Lu, M. (2024). Future Changes in Global Atmospheric Rivers Projected by CMIP6 Models. Journal of Geophysical Research: Atmospheres, 129(3), e2023JD039359. https://doi.org/10.1029/2023JD039359

5. Enhance Stormwater Mitigation Measures

While the project appears to meet regulatory no-net-increase and water quality standards, it does not appear to provide additional stormwater benefits exceeding these requirements. Projects incorporating additional stormwater detention beyond minimum requirements can provide community benefits and increase project and watershed resilience.

Recommendation: Incorporate additional stormwater management features that reduce peak flows and improve water quality. These could deliver broader community benefits and help meet General Plan goals, including Policies ERC-23, HS-13, HS-15, HS-16, and HS-17.

6. Incorporate Adaptive Design Strategies

Given the uncertainties in future climate conditions, incorporating flexibility into the project's stormwater management design is essential. We encourage trigger-based commitments to provide accountability for future adaptation.

Recommendation: Establish mitigation measures with measurable thresholds or triggers for future adaptation, such as expanding detention or upgrading conveyance, if observed conditions exceed current assumptions.

Conclusion

We commend the project team for incorporating flood-related considerations and measures as part of the site's redevelopment and recognizing the importance of managing stormwater and minimizing flood risk. These efforts provide a valuable foundation for long-term resilience. By integrating the recommendations outlined above, including alignment with regional guidance, updated precipitation projections, and adaptive design strategies, the project can further strengthen its ability to manage future climate risks and provide broader community benefit.

Thank you for the opportunity to provide input. Please contact me at sbundy@oneshoreline.org should you have any questions or wish to further consult on our comments.

Sincerely,

Summer Bundy

Summer Bundy
Director of Project Management

CC: Len Materman, CEO, OneShoreline

Docusign Envelope ID: 4913439B-9CF1-4352-91F5-E2FADDF96C1A

SAN FRANCISCO INTERNATIONAL AIRPORT

August 11, 2025

City of San Bruno
Community Development Department
Attn: Peter Gilli
567 El Camino Real
San Bruno, California 94066

TRANSMITTED VIA EMAIL ONLY
Tanforan@sanbruno.ca.gov

Subject: ***CEQA DEIR Comment Letter: Tanforan Redevelopment Project, San Bruno***

Thank you for notifying the San Francisco International Airport (SFO or the Airport) of the availability of the Draft Environmental Impact Report (DEIR) for the Tanforan Redevelopment Project (Proposed Project) in the City of San Bruno (City). We appreciate this opportunity to review and provide comments on the DEIR.

As the Airport stated in previous letters sent to the City on January 14, 2024, May 6, 2022, and December 16, 2022, the proposal to redevelop the Proposed Project site with residential uses is incompatible with the noise compatibility policies of the *Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport* (SFO ALUCP). The Airport remains concerned with the development of high-density residential uses on the Proposed Project site.

In addition, four other agencies and organizations submitted letters to the City expressing their concerns over the development of residential uses on the Proposed Project site: the California Department of Transportation on January 25, 2022 and January 17, 2024; the Federal Aviation Administration (FAA) on May 18, 2022 and January 18, 2024; the SFO Airport/Community Roundtable on May 24, 2022; and the City/County Association of Governments of San Mateo County on January 17, 2024.

Proposed Tanforan Redevelopment Project

The DEIR states that the Proposed Project is located on a 44-acre site that consists of six parcels at 1122, 1150, 1178, 1188 El Camino Real and 300 Tanforan Shopping Center (Assessor's Parcel Numbers 014-316-080, 014-316-300, 014-316-310, 014-316-360, 014-316-330, and 014-316-060). The site is generally bounded by Sneath Lane to the north, Huntington Avenue to the east, Interstate 380 to the south, and El Camino Real to the west. One of the parcels is a vacant lot on the north side of Sneath Lane. The site is currently occupied by retail uses and surface parking, collectively known as The Shops at Tanforan. Existing development in the vicinity consists of: commercial uses to the north; the Bay Area Rapid Transit (BART) San Bruno station and parking structure, a joint BART/City police station, single-family residential uses, and commercial uses to the east; Interstate 380 and residential uses to the south; and multi-family residential uses, commercial uses, and the Golden Gate National Cemetery to the west.

The Proposed Project consists of demolishing all existing uses on the site except for the Century at Tanforan Theater, the Target, and their associated parking garages and constructing a mixed-use development. The site includes a programmed area and two flex zones. The programmed area would include 1,014 residential units, approximately 112,000 square feet of new and relocated retail space, approximately 724,000 square feet of life-science laboratory/office uses, a 35,000-square-foot amenity building, public and private open

AIRPORT COMMISSION CITY AND COUNTY OF SAN FRANCISCO

DANIEL LURIE MAYOR | **MALCOLM YEUNG** PRESIDENT | **JANE NATOLI** VICE PRESIDENT | **JOSE F. ALMANZA** | **MARK BUELL** | **SUSAN LEAL** | **MIKE NAKORNKHET** AIRPORT DIRECTOR

POST OFFICE BOX 8097 SAN FRANCISCO, CA 94128 TEL 650.821.5000 FAX 650.821.5005 **FLYSFO.COM**

Docusign Envelope ID: 4913439B-9CF1-4352-91F5-E2FADDF96C1A

space, and underground and above-grade parking. The existing Century at Tanforan movie theater would be remodeled and incorporated into the Proposed Project, and the existing Target would remain.

The two flex zones could be developed with additional residential, life-science laboratory/office, and/or hotel uses with parking. The exact amount and configuration of future development in the flex zones are not known at this time and would be determined by market conditions and user demand. The DEIR analyzed two land use scenarios for the flex zones.

- One scenario would include an additional 1,000,000 square feet of life-science laboratory/office space and an additional 34,000 square feet of amenity space.
- The other scenario would include 500 additional residential units, an additional 100,000 square feet of retail space, an additional 450,000 square feet of life-science laboratory/office space, an additional 20,000 square feet of amenity space, and a 170-room tourist hotel.

SFO ALUCP Airport Influence Areas

The Tanforan site is within two Airport Influence Areas: Area A – Real Estate Disclosure Area (all of San Mateo County) and Area B – Policy/Project Referral Area (a smaller subarea in the northern part of San Mateo County), as defined by the SFO ALUCP. Within Area A, the real estate disclosure requirements of state law apply (see **Attachment A**). A property owner offering a property for sale or lease must disclose the presence of planned or existing airports within two miles of the property. Within Area B, the Board of Directors of the City/County Association of Governments of San Mateo County (C/CAG), acting as the designated Airport Land Use Commission (ALUC), shall review proposed land use policy actions, including new general plans, specific plans, zoning ordinances, plan amendments and rezonings, and land development proposals (see **Attachment A**). The real estate disclosure requirements in Area A also apply in Area B. The EIR identifies responsible parties for maintaining compatibility and responsible actions under the C/CAG-adopted SFO ALUCP.

Consistency with SFO ALUCP

SFO ALUCP Noise Compatibility Policies

As shown in Figure IV-6 of the SFO ALUCP, the Tanforan site is within the Community Noise Equivalent Level (CNEL) 70 A-weighted decibel (dBA) noise contour (see **Attachment B**). As shown in Table IV-1 of the SFO ALUCP, residential uses are not compatible within the CNEL 70 dBA contour (see **Attachment B**). Developing residential uses within the CNEL 70 dBA contour would expose residents to persistent noise from aircraft operations. This noise exposure is not mitigable for residential uses due to the nature of that development type, which is characterized by operable windows, access to open space, and other design elements which preclude effective mitigation.

As described in the DEIR, the Proposed Project includes two flex zone options that could accommodate up to 1,500 residential units on the site, resulting in residents being exposed to persistent noise from aircraft operations.

Docusign Envelope ID: 4913439B-9CF1-4352-91F5-E2FADDF96C1A

The Airport appreciates that much of the City lies within the CNEL 65 dBA contour. The commercial and industrial land uses that make up most of the existing land uses within the most noise-exposed areas have served both the community and the Airport well for decades. Now, commercial and industrial areas that have been zoned and used as such for decades are being identified for rezoning and redevelopment to include high-density housing because these areas are located adjacent to high-quality transit (i.e., the San Bruno BART and Caltrain stations and the El Camino Real bus corridor) as defined by the State of California.

The Airport supports practical housing development in the Bay Area to address our region's housing affordability crisis. However, adding housing to areas which have been found to be fundamentally unsuited to residential development is neither practical nor desirable. The Airport understands that because of the presence of high-quality transit, the City is under State obligation to meet a higher Regional Housing Needs Allocation (RHNA), but meeting this obligation cannot come at the expense of future residents' health and well-being.

All development actions related to residential uses within the CNEL 70 dBA contour, including rezoning of a site from nonresidential use to residential use, are determined to be incompatible, under Noise Compatibility Policy NP-4 of the SFO ALUCP. This differs from the CNEL 65 dBA contour, where acoustical treatments are capable of reducing interior noise levels and making residential developments conditionally compatible. Developing residential uses within the CNEL 70+ dBA contour would result in a significant effect on future residents and is identified under research-based federal and state regulations as incompatible. Interior insulation would fail to address noise in outdoor amenity spaces often provided alongside housing. Furthermore, the simple act of opening a window would compromise the efficacy of even the best noise insulation.

In 1983, SFO became the first U.S. airport with an approved noise compatibility program from the FAA. Since then, the FAA and SFO have funded, implemented, and maintained a robust sound insulation program that has allowed SFO to be one of the few public use airports in the State of California to be fully compliant under Title 21 of the California Code of Regulations. Through the Airport's Noise Insulation Program (NIP), millions of dollars of FAA and SFO funds have been expended to achieve land use compatibility within the CNEL 65 dBA contour by providing noise insulation improvements to homes, places of worship, and schools to be consistent with federal and state land use compatibility regulations. Between the 1980s and the conclusion of ongoing work at the end of March 2024, the NIP's efforts in San Bruno will have included insulation of 2,669 residential properties plus replacement or repair of insulation improvements that had not met performance expectations in six dwellings with a total cost of approximately $36 million. In addition, seven San Bruno residential properties are scheduled for acoustic treatment and/or re-insulation to be completed by 2025 with a projected investment of $1.5 million. Furthermore, 75 San Bruno properties have been identified as potentially eligible for re-insulation in future phases of the NIP, with FAA and SFO investments estimated between $12 million and $13 million. Redevelopment of the Tanforan site to include high-density residential units would undermine decades of scientifically informed land use planning and millions of dollars expended to safeguard public health and safety.

Docusign Envelope ID: 4913439B-9CF1-4352-91F5-E2FADDF96C1A

The materials and technology used for sound insulation have limited warranties and eventually fail. Residential development within the CNEL 70 dBA contour would render the Tanforan development ineligible for FAA/SFO grants for future sound insulation, including the subsequent repair or reinstallation of insulation materials when they fail over time. Similarly, California Public Utilities Code Section 21678 precludes the City and County of San Francisco/SFO from any liability should the City proceed with the Proposed Project in contravention of the SFO ALUCP noise compatibility policies. There would be no viable aircraft noise abatement or noise mitigation measures that could alleviate the significant noise these future residents may experience, especially from long-haul international air carriers and cargo operators that depart late at night and early in the morning. Due to the weight of the cargo, cargo freighter aircraft typically fly slowly and low to the ground. The Airport will not be able to address noise complaints that are sure to arise from these future residents and will refer them to the City.

The noise exposure effects of the Proposed Project would be unprecedented in the United States. Future residents would be located directly beneath the flight paths of two primary departure runways serving international operations. Airport staff conducted a search to determine if there were any comparable residential densities in the United States based on the same parameters as the proposed housing development at the Tanforan site, including being located within 1.2 miles of the extended centerline of a runway with at least 7,000 feet of takeoff distance available and which is used commonly for departure operations. As shown in **Attachment C**, the Airport's analysis found that there is no other housing of comparable density in the United States. The Proposed Project would result in the densest population per square mile near a major U.S. international airport and would instantly become the most visible and severe example of poor airport land use compatibility planning.

The baseline noise conditions for future residents would be significant but can be avoided if the City identifies other locations for housing outside the CNEL 70 dBA contour. The Airport has noted to the City and the ALUC that the City has failed to take zoning actions at other sites, including 2101 Sneath Lane and 300 Piedmont Avenue, which would increase residential density in compatible areas of the City and therefore reduce or eliminate the need to provide for housing developments within incompatible areas like Tanforan.

SFO ALUCP Safety Compatibility Policies
The land use compatibility criteria for safety zones are provided in Table IV-2 of the SFO ALUCP (see **Attachment D**). The safety compatibility criteria are generally based on the guidelines provided in the *California Airport Land Use Planning Handbook* (Caltrans Handbook),[1] although modifications have been made in recognition of the intense level of existing development in the vicinity of airports. Appendix E of the Caltrans Handbook contains a discussion of the factors that were considered in establishing the safety compatibility policies. The criteria include two categories: uses that are incompatible and uses that should be avoided in the respective zones.

[1] Caltrans Division of Aeronautics, California Airport Land Use Planning Handbook. Available online at https://dot.ca.gov/-/media/dot-media/programs/aeronautics/documents/californiaairportlanduseplanninghandbook-a11y.pdf

Docusign Envelope ID: 4913439B-9CF1-4352-91F5-E2FADDF96C1A

The Proposed Project is within Safety Zone 4; incompatible uses within Safety Zone 4 include large child day care centers, Biosafety level 3 and 4 facilities, and children's schools. Uses to be avoided, such as critical public utilities, should not be allowed in the Safety Zone unless no feasible alternative is available, as determined by the City. Where these uses are allowed, habitable structures shall be provided with at least 50 percent more exits than required by applicable codes. The Airport encourages the City to consider Safety Zone 4 compatibility policies during the master planning and site development phases to prevent development of such incompatible uses.

SFO ALUCP Airspace Protection Policies
As shown on Exhibit IV-17 of the SFO ALUCP (see **Attachment E**), the elevations of the critical aeronautical surfaces at the Tanforan site range from approximately 125 to 145 feet above mean sea level (AMSL), as defined from the origin of the North American Vertical Datum of 1988 (NAVD88). Given that the ground elevation at the Tanforan site ranges from 36 to 55 feet AMSL NAVD88 and assuming that the Proposed Project does not change the ground elevation, the heights of the buildings would need to be no higher than approximately 55 and 90 feet above ground level, depending on horizontal location, to be compatible with the Airspace Protection Policies of the SFO ALUCP. Such compatibility would also be contingent on the issuance of a Determination of No Hazard from the FAA (see below) for any proposed structures and determinations from C/CAG as the designated ALUC.

This determination would not negate the requirement for the developer to also undergo FAA review as described in Title 14 Code of Federal Regulations Part 77 for both (1) the permanent structures and (2) any temporary cranes or other equipment taller than the permanent buildings that would be required to construct those structures. Due to the proximity of the Proposed Project to the Airport and certain procedures from the two primary departure runways (Runways 10L-28R and 10R-28L), both the permanent buildings and temporary cranes or construction equipment must be considered. Any penetrations of the critical aeronautical surfaces adopted in the SFO ALUCP would result in real financial and economic impacts to air carriers, cargo operators, and the City and County of San Francisco/SFO and would potentially reduce airlines' ability to transport the high-value cargo that many City businesses, including potentially the laboratory/office uses proposed at Tanforan, rely upon for their viability.

Airspace Protection Policies AP-1 through AP-4 of the SFO ALUCP are attached as a reminder of incompatible site characteristics, especially as they pertain to wildlife hazards and solar panel or building materials/features that reflect and create bright lights or glare (see **Attachment E**).

EIR Topics

In the sections below, we provide specific comments by DEIR topic:

1) *Hazards and Hazardous Materials (Chapter 3.7)*

There are a number of inaccuracies, mischaracterizations, and errors in Impact HAZ-5, which pertains to projects near an airport resulting in safety hazards or excessive noise for people residing or working in the project area.

Docusign Envelope ID: 4913439B-9CF1-4352-91F5-E2FADDF96C1A

a) The DEIR mischaracterizes the risk of bird strikes and should include stronger mitigation measures to ensure that bird populations are monitored and managed.

The Proposed Project includes a net increase of 361 trees on the project site. The DEIR states, "While more birds may be present on the site compared to existing conditions, given the heavily urbanized nature of the area, the introduction of more trees is unlikely to substantially change the existing bird population dynamics and flight patterns." There is no further information in the DEIR to substantiate this statement. Bird strikes are a constant threat to aviation safety at the Airport. The inclusion of landscaping features as part of the Proposed Project could attract wildlife and would not be consistent with the airspace protection policies of the SFO ALUCP. Specifically, Airspace Protection Policy AP-4 of the SFO ALUCP states that:

> Proposed land uses with characteristics that may cause visual, electronic, or wildlife hazards, particularly bird strike hazards, to aircraft taking off or landing at the Airport or in flight are incompatible in Area B of the Airport Influence Area … Specific characteristics that may create hazards to aircraft in flight and which are incompatible include: … (f) Any use that creates an increased attraction for wildlife, particularly large flocks of birds, that is inconsistent with FAA rules and regulations, including, but not limited to, … FAA Advisory Circular 150/5200-33B, *Hazardous Wildlife Attractants On or Near Airports*, and any successor or replacement orders or advisory circulars.

Landscaping features would attract birds, which pose a significant safety hazard to aircraft and passengers that are taking off or landing at SFO – and to the wildlife. A bird strike that disables an aircraft engine could result in the catastrophic loss of human life, impacting hundreds of passengers and crew on the plane and potentially even more people on the ground. The DEIR later characterizes bird strikes at SFO to be "relatively rare", concluding that risk of hazards to aircraft from bird strikes is considered low. SFO does conduct robust wildlife management practices to mitigate bird strike risks. However, it is misleading to conclude that rarity of bird strikes translates to low risk of a catastrophic accident. One large bird ingested into an engine can completely disable it. During takeoff, which is where the Proposed Project is aligned with the Runway 28 departures, this could have disastrous effects. The FAA's Wildlife Hazard Mitigation webpage has additional information on wildlife-aircraft strikes including a wildlife strike database that contains records or reported wildlife strikes since 1990.[2,3] Wildlife strikes are increasing due to expanding wildlife populations and a trend towards faster and quieter aircraft.

The DEIR should include a mitigation measure that ensures that a FAA-certified wildlife biologist, as opposed to a general biologist that is unfamiliar with wildlife strike risks to aircraft operations, will evaluate the landscaping features of the Proposed Project to confirm that they will not attract birds or affect bird population dynamics and flight patterns. Furthermore, the mitigation measures should include monitoring in the future to ensure that if the bird population increases at the Proposed Project or if bird flight patterns

[2] FAA. Wildlife Hazard Mitigation. Available at: https://www.faa.gov/airports/airport_safety/wildlife. Accessed on: August 5, 2025.
[3] FAA. Wildlife Strike Database. Available at: https://wildlife.faa.gov/home. Accessed on: August 5, 2025.

Docusign Envelope ID: 4913439B-9CF1-4352-91F5-E2FADDF96C1A

are affected in a way that is a potential hazard to the Airport, that the project proponent will commit to measures that address this issue.

b) *The DEIR does not account for the adverse impact of solar panels on flight safety and should include a mitigation measure to ensure that glare does not affect aircraft pilot vision*

The DEIR states in reference to SFO ALUCP Policy AP-4 regarding highly reflective buildings or building features, bright lights, including search lights or laser displays, or otherwise distracting lights that the Proposed Project does not include any such features. This is incorrect. The Proposed Project includes installation of solar panels on parking garages. Solar panels are highly reflective and therefore can negatively impact the vision of aircraft pilots. The Airport has a number of solar panel installations to generate electricity and each installation must undergo analysis to ensure that the glare from the solar panels would not impact aviation activity. The analysis includes the location of the solar panels, the angle of installation, the positions of the sun throughout the day over the year, and flight paths. As the Proposed Project lies under the departures and arrivals flight path, the DEIR should include a mitigation measure to ensure that such an analysis is performed for the solar panels that would be installed at the Proposed Project and that measures would be taken to avoid glare impacts.

c) *The DEIR contains incorrect information on the approval of temporary structures (e.g., construction cranes) with respect to critical aeronautical surfaces*

The DEIR includes Mitigation Measure HAZ-5 for demonstrating compliance with SFO airspace compatibility policies. It states:

> The use of equipment in locations where it would penetrate critical aeronautical surfaces shall be expressly prohibited by any construction or building permits issues, unless use of specific temporary construction equipment is so approved by the FAA. The use of temporary construction equipment (e.g., cranes) may be used to construct the permanent structures. Cranes may be in excess of ALUCP surfaces and may exceed FAA height constraints.

This is partially incorrect and does not provide full context for the approval process. Temporary equipment that exceeds any height limitations would never be allowed by FAA. The language in the mitigation measure would be better stated as:

> The SFO ALUCP does not consider temporary construction cranes, and therefore, cranes are not restricted to the maximum heights defined in the SFO ALUCP. Proposed crane work zones must be submitted to the FAA for evaluation pursuant to 14 Code of Federal Regulations Part 77. If a crane is found to be a hazard to air navigation or otherwise disruptive to flight operations, the FAA, in concert with other aviation stakeholders, may impose limitations on its use.

The mitigation measure also states:

Docusign Envelope ID: 4913439B-9CF1-4352-91F5-E2FADDF96C1A

> Buildings with heights in excess of the applicable critical aeronautical surface as shown in Exhibit IV-17 of the ALUCP shall be prohibited unless the FAA determines the proposed building height is not a hazard to air navigation in an aeronautical study prepared pursuant to filling of Form 7460-1.

This is incorrect. Buildings with heights in excess of the critical aeronautical surfaces in the SFO ALUCP are, by definition, prohibited; the FAA will not make the determination that such a building would not be a hazard to air navigation. This should be re-written as follows:

> All permanent buildings must comply with the maximum allowable heights in the ALUCP and must receive a Determination of No Hazard from FAA. In all cases, the lower of the two allowable heights is the controlling height.

2) *Noise and Vibration (Chapter 3.10)*

   a) *The DEIR incorrectly evaluates the Impact NOI-3 as Less than Significant with Mitigation; it should be Significant and Unavoidable with Mitigation due to the Proposed Project's incompatibility with the SFO ALUCP*

The DEIR states that Impact NOI-3 ("For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, the project would not expose people residing or working in the project area to excessive noise levels") is Less Than Significant with Mitigation. However, the Proposed Project conflicts with the SFO ALUCP Noise Policy by introducing residential housing in the CNEL 70 dB. Impact NOI-3 should be Significant and Unavoidable with Mitigation because there is no mitigation that would make the impacts to residents less than significant. The SFO ALUCP Noise Policy NP-2 states that any residential land use within the CNEL 70-75 dB is incompatible. The only exception to this determination is for parcels that were zoned for residential use as of the effective date (November 8, 2012) of the SFO ALUCP. This exemption does not apply to the Proposed Project, which was zoned as commercial land use as of November 8, 2012. Even if new building materials and construction can achieve interior noise levels to less than 45 dB, the materials and technology used for sound insulation eventually fail over time. We have seen this with the NIP projects that the FAA and the Airport funds in nearby residences. Also, to ensure that interior noise levels remain less than 45 dB, all windows must be inoperable because any open windows will negate the effects of enhanced sound insulation. In addition, this does not take into account outdoor areas of the Proposed Project. Residents who go outdoors to use the communal features of the Proposed Project will still be exposed to aircraft noise.

Mitigation Measure NOI-3 describes developing an airport noise reduction plan for the residential dwellings. One of the design features included in this mitigation measure is "ventilation upgrades to ensure windows can remain closed." This should be modified to "ventilation upgrades so that windows are inoperable." As mentioned above, any open windows will negate the noise insulation effectiveness of building materials. Nevertheless, even with this mitigation measure, the impact would still be Significant and Unavoidable with Mitigation.

Docusign Envelope ID: 4913439B-9CF1-4352-91F5-E2FADDF96C1A

3) *Land Use (Chapter 3.9)*

   a) *The DEIR incorrectly evaluates the Impact LU-2 as Less than Significant with Mitigation; it should be Significant and Unavoidable with Mitigation due to the Proposed Project's incompatibility with the SFO ALUCP*

The DEIR states that Impact LU-2 ("The project would not result in an environmental impact due to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect") is Less Than Significant with Mitigation. However, the Proposed Project conflicts with the SFO ALUCP Noise Policy by introducing residential housing in the 70 dB CNEL. As stated above, Impact NOI-3 should be Significant and Unavoidable with Mitigation because there is no mitigation that would make the impacts to residents less than significant. The SFO ALUCP Noise Policy NP-2 states that any residential land use within the CNEL 70-75 dB is incompatible. The only exception to this determination is for parcels that were zoned for residential use as of the effective date (November 8, 2012) of the SFO ALUCP. Under only this exception would residential buildings be conditionally compatible provided that the buildings be sound insulated to achieve an indoor noise level of CNEL 45 dB or less and that the owner grant an avigation easement to the City and County of San Francisco. Thus, the ALUC will have to make the determination that the Proposed Project is not consistent with the SFO ALUCP. The City of San Bruno can override the consistency determination, but by definition, this override means that Proposed Project is inconsistent with the SFO ALUCP. The override of the determination is not a mitigation of this impact.

4) *Project Alternatives (Chapter 4)*

   a) *The DEIR's alternatives analysis is inadequate and should have included off-site locations*

The DEIR states that the Off-Site Alternative to the Proposed Project was considered but rejected as infeasible. Under the Off-site Alternative, the Tanforan Redevelopment Project, or a project of similar scale and intensity, would be implemented at a different location in the City of San Bruno. One of the reasons stated why the alternative was rejected was that it would not increase the city of San Bruno's housing supply in support of its Regional Housing Needs Allocation (RHNA) obligations. This statement is misleading. There are alternative locations outside of the CNEL 70 dBA contour for developing housing in the City of San Bruno. As stated in past letters to the City, these include the Bayhill Specific Plan area and the transit-oriented development corridor along El Camino Real and San Mateo Avenue. Both areas would avoid noise impacts to future residents, would be outside of all SFO ALUCP safety zones, and have higher airspace limits compared to the location of the Proposed Project. The Off-Site Alternative should have been analyzed along with the other three alternatives that were evaluated in the DEIR.

* * *

The Airport continues to urge the City to re-evaluate its plans to introduce incompatible residential land uses into the CNEL 70 DBA contour. As the Airport has noted in prior letters on both this and other projects, there are alternative locations outside of the CNEL 70 dBA contour for developing housing to meet its Regional Housing Needs Allocation of 3,165 units by the year 2031, and the Airport encourages the City to take advantage of these resources rather than subjecting its future residents to significant noise exposure.

Docusign Envelope ID: 4913439B-9CF1-4352-91F5-E2FADDF96C1A

If SFO can be of assistance, please do not hesitate to contact Nupur Sinha, Director of Planning and Environmental Affairs at nupur.sinha@flysfo.com, Audrey Park, Environmental Affairs Manager at audrey.park@flysfo.com, or the Planning Department at (650) 821-6678.

Sincerely,

DocuSigned by:
Judi Mosqueda
1DAA33FF0622491...

Judi Mosqueda
Chief Development Officer
San Francisco International Airport

Attachments

- Attachment A – SFO ALUCP Airport Influence Areas
- Attachment B – SFO ALUCP Noise Compatibility Policies
- Attachment C – Housing Density Along Runway Centerlines at U.S. Airports
- Attachment D – SFO ALUCP Safety Compatibility Policies
- Attachment E – SFO ALUCP Airspace Protection Policies

cc:

- Cathy Widener, SFO Chief External Affairs Officer
- Nupur Sinha, SFO Director of Airport Planning and Environmental Affairs
- Audrey Park, SFO Environmental Affairs Manager
- Amy Choi, Manager, FAA Western Pacific Region, San Francisco Airports District Office
- Mathew Friedman, Chief, Caltrans Division of Aeronautics
- Susy Kalkin, C/CAG Airport Land Use Committee

Docusign Envelope ID: 4913439B-9CF1-4352-91F5-E2FADDF96C1A

Attachment A:

SFO ALUCP Airport Influence Areas

Docusign Envelope ID: 4913439B-9CF1-4352-91F5-E2FADDF96C1A

4.2 Airport Influence Area (AIA)

The AIA for SFO includes two parts: Area A and Area B. Area A is the larger of the two areas and encompasses all of San Mateo County. Area B lies within Area A and includes land exposed to aircraft noise above CNEL 65 dB or lying below critical airspace.

Area A, depicted on **Exhibit IV-1**, includes the entire county, all of which is overflown by aircraft flying to and from SFO at least once per week at altitudes of 10,000 feet or less above mean sea level (MSL). (Appendix L explains the rationale for defining the AIA Area A boundary.)

Area B of the AIA, depicted on **Exhibit IV-2**, is based on a combination of the outer boundaries of the noise compatibility and safety zones, the 14 CFR Part 77 conical surface, and the TERPS approach and One-Engine Inoperative (OEI) departure surfaces.[1] As depicted on Exhibit IV-2, the Area B boundary has been adjusted to follow streets, highways, and corporate boundaries to make it easier to identify and implement. See **Exhibit IV-3** for a close-up view of the northwestern half of Area B and **Exhibit IV-4** for a close-up view of the southeastern half.

The following AIA policies (IP) shall apply to the ALUCP.

IP-1 AIRPORT INFLUENCE AREA A – REAL ESTATE DISCLOSURE AREA

Within Area A, the real estate disclosure requirements of state law apply. Section 11010 of the Business and Professions Code requires people offering subdivided property for sale or lease to disclose the presence of all existing and planned airports within two miles of the property.[2] The law requires that, if the property is within an "airport influence area" designated by the airport land use commission, the following statement must be included in the notice of intention to offer the property for sale:

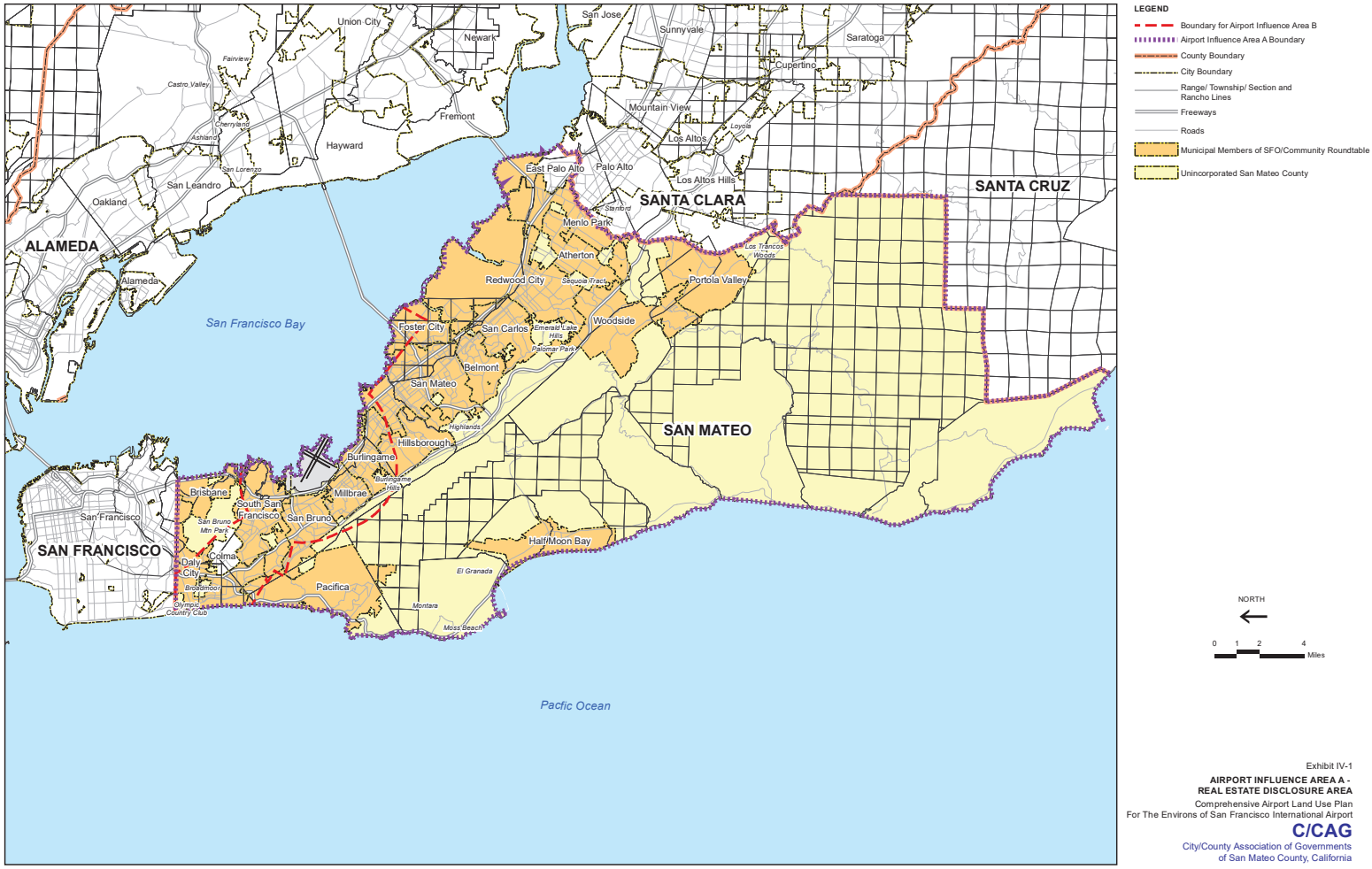
NOTICE OF AIRPORT IN VICINITY

This property is presently located in the vicinity of an airport, within what is known as an airport influence area. For that reason, the property may be subject to some of the annoyances or inconveniences associated with proximity to airport operations (for example: noise, vibration, or odors). Individual sensitivities to those annoyances can vary from person to person. You may wish to consider what airport annoyances, if any, are associated with the property before you complete your purchase and determine whether they are acceptable to you.

[1] On the northwest side, the Area B boundary corresponds to the 800-foot elevation line of the TERPS approach surface and the OEI departure surface. On the southeast side, the Area B boundary corresponds with the transitional surfaces rising from the flat, central portion of the TERPS surface having an elevation of 210 feet MSL. See Exhibits IV-17 and IV-18 for a detailed depiction of the airspace surfaces.

[2] California Business and Professions Code, Section 11010(b)(13).

Docusign Envelope ID: 4913439B-9CF1-4352-91F5-E2FADDF96C1A



LEGEND

- Boundary for Airport Influence Area B
- Airport Influence Area A Boundary
- County Boundary
- City Boundary
- Range/ Township/ Section and Rancho Lines
- Freeways
- Roads
- Municipal Members of SFO/Community Roundtable
- Unincorporated San Mateo County

NORTH

0 1 2 4 Miles

Exhibit IV-1

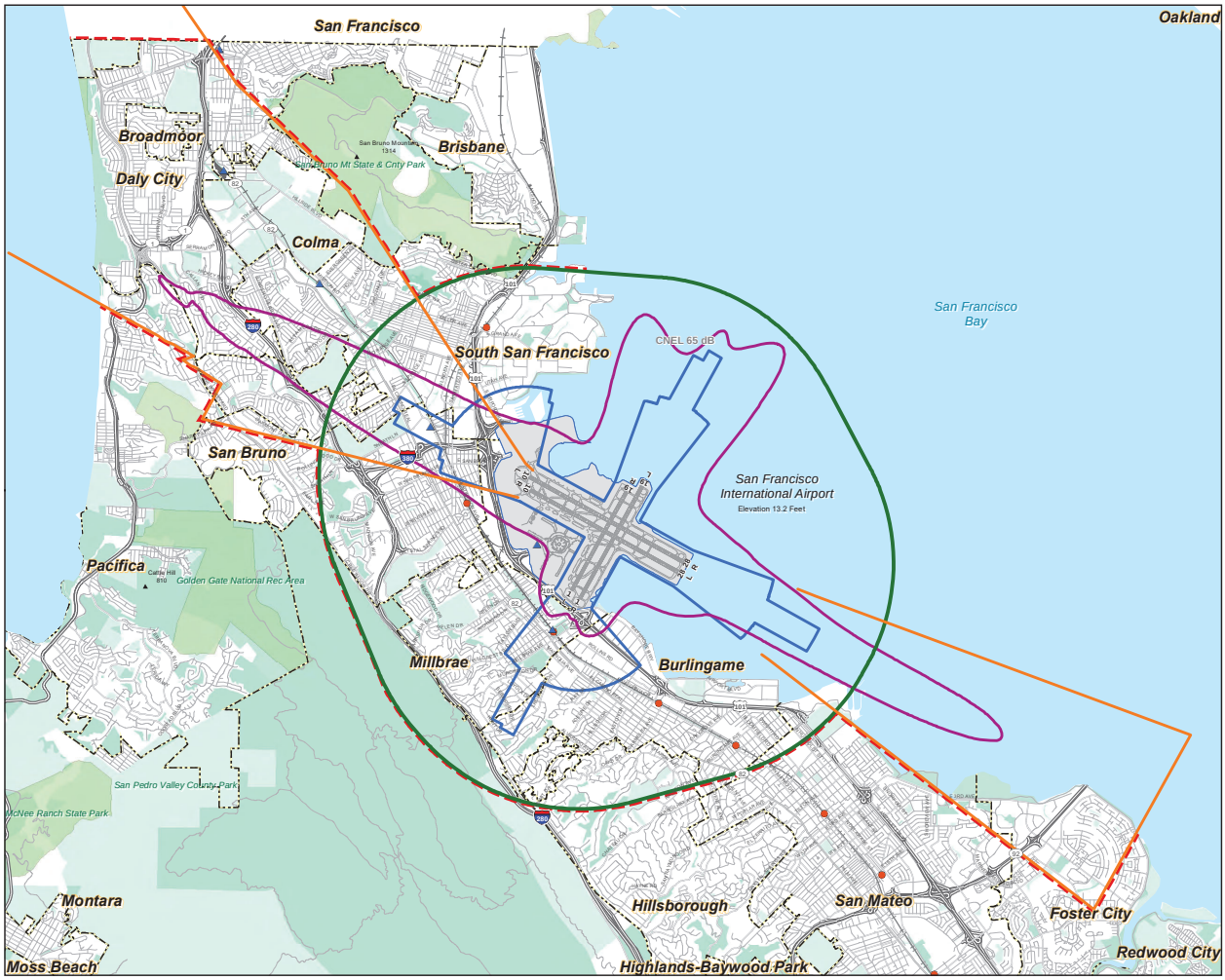
AIRPORT INFLUENCE AREA A - REAL ESTATE DISCLOSURE AREA

Comprehensive Airport Land Use Plan
For The Environs of San Francisco International Airport

C/CAG

City/County Association of Governments
of San Mateo County, California

Docusign Envelope ID: 4913439B-9CF1-4352-91F5-E2FADDF96C1A



LEGEND

- Boundary for Airport Influence Area B
- Outer Boundary of Safety Zones
- CNEL Contour, 2020 Forecast
- 14 CFR Part 77 Conical Surface
- Outer Boundary of TERPS Approach and OEI Departure Surfaces
- Airport Property
- BART Station
- CALTRAIN Station
- Municipal Boundary
- Railroad
- Freeway
- Road
- Local Park, Golf Course, Cemetery
- Regional Park or Recreation Area
- Open Space

Sources:

100:1 FAA Notification Zone: Ricondo & Associates, Inc. and Jacobs Consultancy, based on 14 CFR Part 77, Subpart B, Section 77.9.

Outer Boundary of TERPS Approach and OEI Departure Surfaces: San Francisco International Airport, Jacobs Consultancy, and Planning Technology Inc., 2009

Safety Compatibility Zones: Jacobs Consultancy Team, 2009; Ricondo & Associates, Inc., 2011

Noise Contour: URS Corporation and BridgeNet International. Draft Environmental Assessment, San Francisco International Airport Proposed Runway Safety Area Program, June 2011

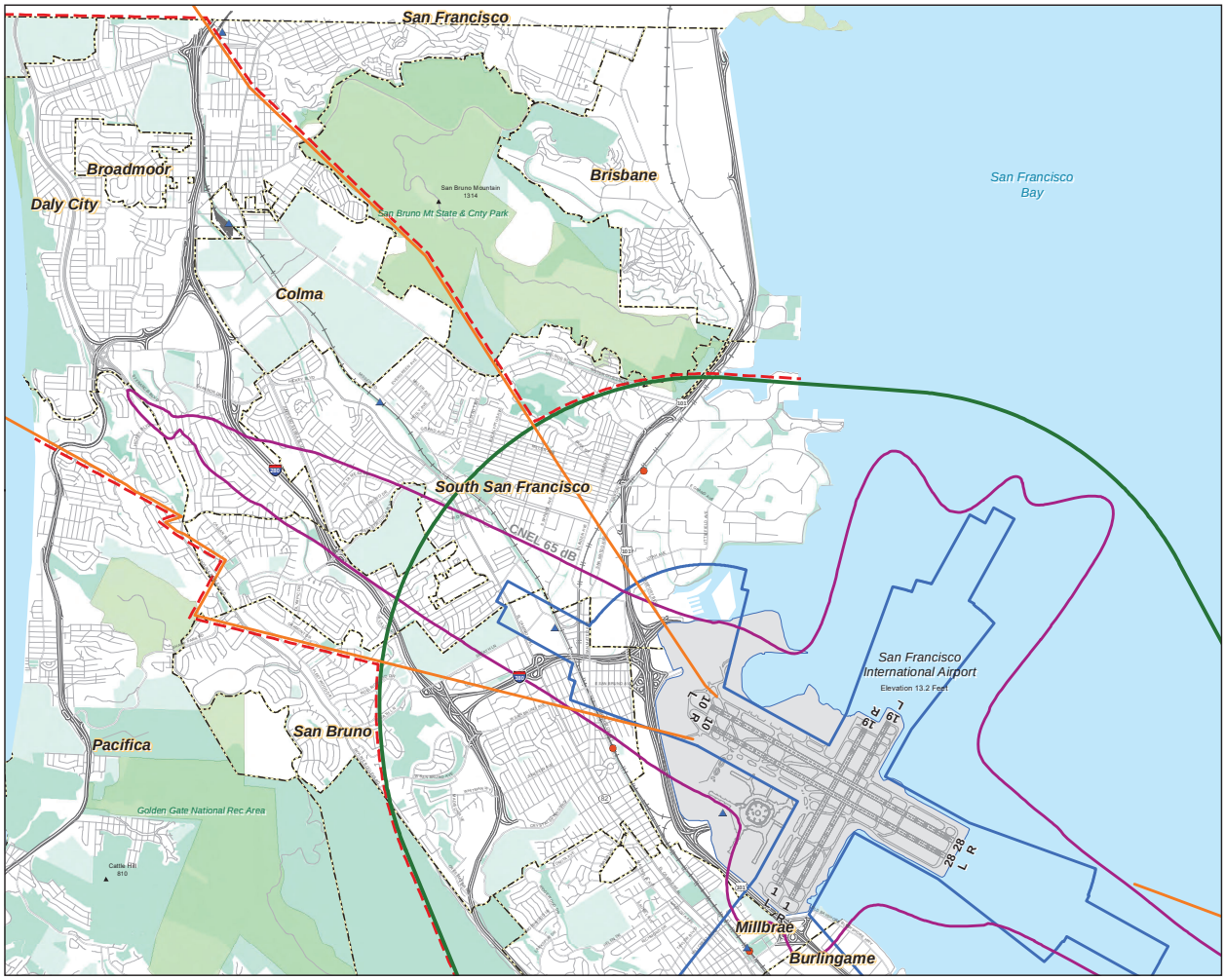
NORTH

0 0.325 0.65 1.3 Miles

Exhibit IV-2
AIRPORT INFLUENCE AREA B --
LAND USE POLICY ACTION/PROJECT REFERRAL AREA
Comprehensive Airport Land Use Plan
for the Environs of San Francisco International Airport

C/CAG
City/County Association of Governments
of San Mateo County, California

Docusign Envelope ID: 4913439B-9CF1-4352-91F5-E2FADDF96C1A



LEGEND

- Boundary for Airport Influence Area B
- Outer Boundary of Safety Zones
- CNEL Contour, 2020 Forecast
- 14 CFR Part 77 Conical Surface
- Outer Boundary of TERPS Approach and OEI Departure Surfaces
- Airport Property
- BART Station
- CALTRAIN Station
- Municipal Boundary
- Railroad
- Freeway
- Road
- Local Park, Golf Course, Cemetery
- Regional Park or Recreation Area
- Open Space

Sources:

100:1 FAA Notification Zone: Ricondo & Associates, Inc. and Jacobs Consultancy, based on 14 CFR Part 77, Subpart B, Section 77.9.

Outer Boundary of TERPS Approach and OEI Departure Surfaces: San Francisco International Airport, Jacobs Consultancy, and Planning Technology Inc., 2009

Safety Compatibility Zones: Jacobs Consultancy Team, 2009; Ricondo & Associates, Inc., 2011

Noise Contour: URS Corporation and BridgeNet International. Draft Environmental Assessment, San Francisco International Airport Proposed Runway Safety Area Program, June 2011

NORTH

0 0.2 0.4 0.8 Miles

Exhibit IV-3
AIRPORT INFLUENCE AREA B -- NORTH SIDE
Comprehensive Airport Land Use Plan
for the Environs of San Francisco International Airport

C/CAG
City/County Association of Governments
of San Mateo County, California

Docusign Envelope ID: 4913439B-9CF1-4352-91F5-E2FADDF96C1A

IP-2 AIRPORT INFLUENCE AREA B – POLICY/PROJECT REFERRAL AREA

Within Area B, the Airport Land Use Commission (the C/CAG Board) shall exercise its statutory duties to review proposed land use policy actions, including new general plans, specific plans, zoning ordinances, plan amendments and rezonings, and land development proposals. The real estate disclosure requirements in Area A also apply in Area B. For the purposes of this policy, parcels along the edge of the Area B Boundary that are split by the boundary shall be considered as fully being within Area B.

Portions of unincorporated San Mateo County and the following municipalities are located within Area B:

- Daly City – small part of the city in the Serramonte area
- Colma –the entire town
- Pacifica – north and northeast of the city
- South San Francisco – all but north and west sides of the city
- San Bruno – all but northwest corner of the city
- Millbrae – the entire city
- Burlingame – the entire city
- Hillsborough – the northern part of the town, north of Chateau Drive
- San Mateo – a few blocks in the City of San Mateo
- Foster City – the northern part of the City
- Unincorporated San Mateo County: California Golf Club, Country Club Park, Burlingame Hills, and San Francisco International Airport

The following special districts are located within Area B of the AIA:

- North San Mateo County Sanitation District
- Peninsula Health Care District
- San Mateo County Flood Control District
- San Mateo County Harbor District
- San Mateo County Mosquito & Vector Control District
- Westborough County Water District

The following school districts and community college district are located within Area B:

- Bayshore Elementary School District
- Brisbane Elementary School District
- Burlingame Elementary School District

Docusign Envelope ID: 4913439B-9CF1-4352-91F5-E2FADDF96C1A

- Hillsborough City Elementary School District
- Jefferson Elementary School District
- Jefferson Union High School District
- Millbrae Elementary School District
- Pacifica School District
- San Bruno Park Elementary School District
- San Mateo County Community College District
- San Mateo Foster City Elementary School District
- San Mateo Union High School District
- South San Francisco Elementary School District

4.3 Noise Compatibility Policies

The airport noise compatibility policies described in this section have a two-fold purpose:

1. To protect the public health, safety, and welfare by minimizing the exposure of residents and occupants of future noise-sensitive development to excessive noise.

2. To protect the public interest in providing for the orderly development of SFO by ensuring that new development in the Airport environs complies with all requirements necessary to ensure compatibility with aircraft noise in the area. The intent is to avoid the introduction of new incompatible land uses into the Airport's "noise impact area" so that the Airport will continue to be in compliance with the State Noise Standards for airports (California Code of Regulations, Title 21, Sections 5012 and 5014).[3]

The following noise compatibility policies (NP) shall apply to the ALUCP.

NP-1 NOISE COMPATIBILITY ZONES

For the purposes of this ALUCP, the projected 2020 CNEL noise contour map from the Draft Environmental Assessment for the Proposed Runway Safety Area Program shall define the boundaries within which noise compatibility policies described in this Section shall apply.[4] **Exhibit IV-5** depicts the noise compatibility zones. More detail is provided on **Exhibit IV-6**. The zones are defined by the CNEL 65, 70 and 75 dB contours.

[3] In 2002, the San Mateo County Board of Supervisors declared that the Airport had eliminated its "noise impact area," as defined under state law -- California Code of Regulations, Title 21, Sections 5012 and 5014.

[4] URS Corporation and BridgeNet International. *Draft Environmental Assessment, Proposed Runway Safety Area Program, San Francisco International Airport*, June 2011.

Docusign Envelope ID: 4913439B-9CF1-4352-91F5-E2FADDF96C1A

Attachment B:

SFO ALUCP Noise Compatibility Policies

Docusign Envelope ID: 4913439B-9CF1-4352-91F5-E2FADDF96C1A

- Hillsborough City Elementary School District
- Jefferson Elementary School District
- Jefferson Union High School District
- Millbrae Elementary School District
- Pacifica School District
- San Bruno Park Elementary School District
- San Mateo County Community College District
- San Mateo Foster City Elementary School District
- San Mateo Union High School District
- South San Francisco Elementary School District

4.3 Noise Compatibility Policies

The airport noise compatibility policies described in this section have a two-fold purpose:

1. To protect the public health, safety, and welfare by minimizing the exposure of residents and occupants of future noise-sensitive development to excessive noise.

2. To protect the public interest in providing for the orderly development of SFO by ensuring that new development in the Airport environs complies with all requirements necessary to ensure compatibility with aircraft noise in the area. The intent is to avoid the introduction of new incompatible land uses into the Airport's "noise impact area" so that the Airport will continue to be in compliance with the State Noise Standards for airports (California Code of Regulations, Title 21, Sections 5012 and 5014).[3]

The following noise compatibility policies (NP) shall apply to the ALUCP.

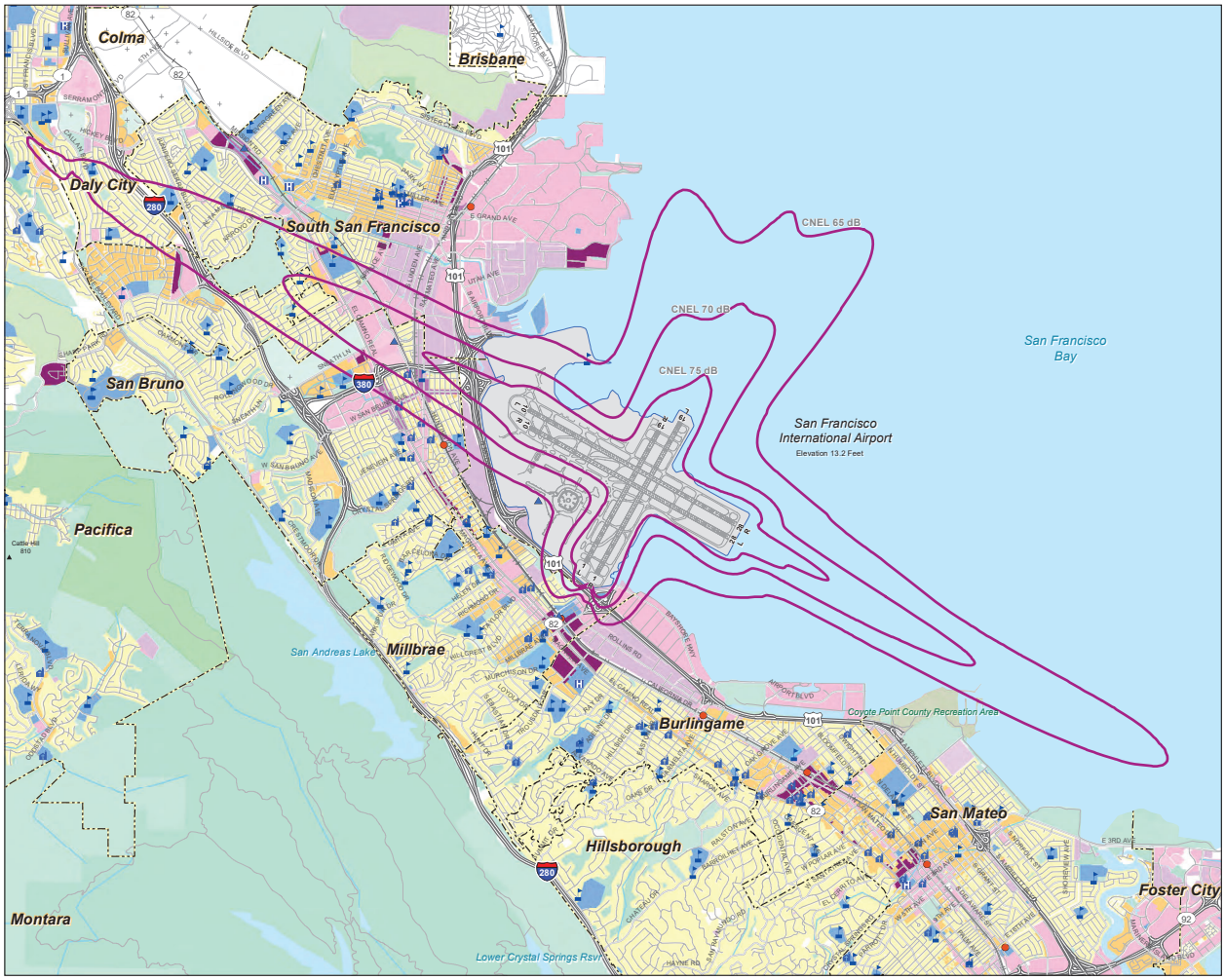
NP-1 NOISE COMPATIBILITY ZONES

For the purposes of this ALUCP, the projected 2020 CNEL noise contour map from the Draft Environmental Assessment for the Proposed Runway Safety Area Program shall define the boundaries within which noise compatibility policies described in this Section shall apply.[4] **Exhibit IV-5** depicts the noise compatibility zones. More detail is provided on **Exhibit IV-6**. The zones are defined by the CNEL 65, 70 and 75 dB contours.

[3] In 2002, the San Mateo County Board of Supervisors declared that the Airport had eliminated its "noise impact area," as defined under state law -- California Code of Regulations, Title 21, Sections 5012 and 5014.

[4] URS Corporation and BridgeNet International. *Draft Environmental Assessment, Proposed Runway Safety Area Program, San Francisco International Airport*, June 2011.

Docusign Envelope ID: 4913439B-9CF1-4352-91F5-E2FADDF96C1A



LEGEND

- CNEL Contour, 2020 Forecast
- Airport Property
- BART Station
- CALTRAIN Station
- School
- Place of Worship
- Hospital
- Municipal Boundary
- Railroad
- Freeway
- Road

Planned Land Use Per General Plans:

- Public
- Multi-Family Residential
- Single Family Residential
- Mixed Use
- Transit Oriented Development
- Commercial
- Industrial, Transportation, and Utilities
- Local Park, Golf Course, Cemetery
- Regional Park or Recreation Area
- Open Space
- Planned use not mapped

Sources:

Noise Contour Data:
- Draft Environmental Assessment, Proposed Runway Safety Area Program, San Francisco International Airport. URS Corporation and BridgeNet International, June 2011

County Base Maps:
- San Mateo County Planning & Building Department, 2007

Local Plans:
- Burlingame Bayfront Specific Area Plan, August 2006
- Burlingame Downtown Specific Plan, January 2009
- Burlingame General Map, September 1984
- North Burlingame/ Rollins Road Specific Plan, February 2007
- Colma Municipal Code Zoning Maps, December 2003
- Daly City General Plan Land Use Map, 1987
- Hillsborough General Plan, March 2005
- Millbrae Land Use Plan, November 1998
- Pacifica General Plan, August 1996
- San Bruno General Plan, December 2008
- San Mateo City Land Use Plan, March 2007
- San Mateo County Zoning Map, 1992
- South San Francisco General Plan, 1998

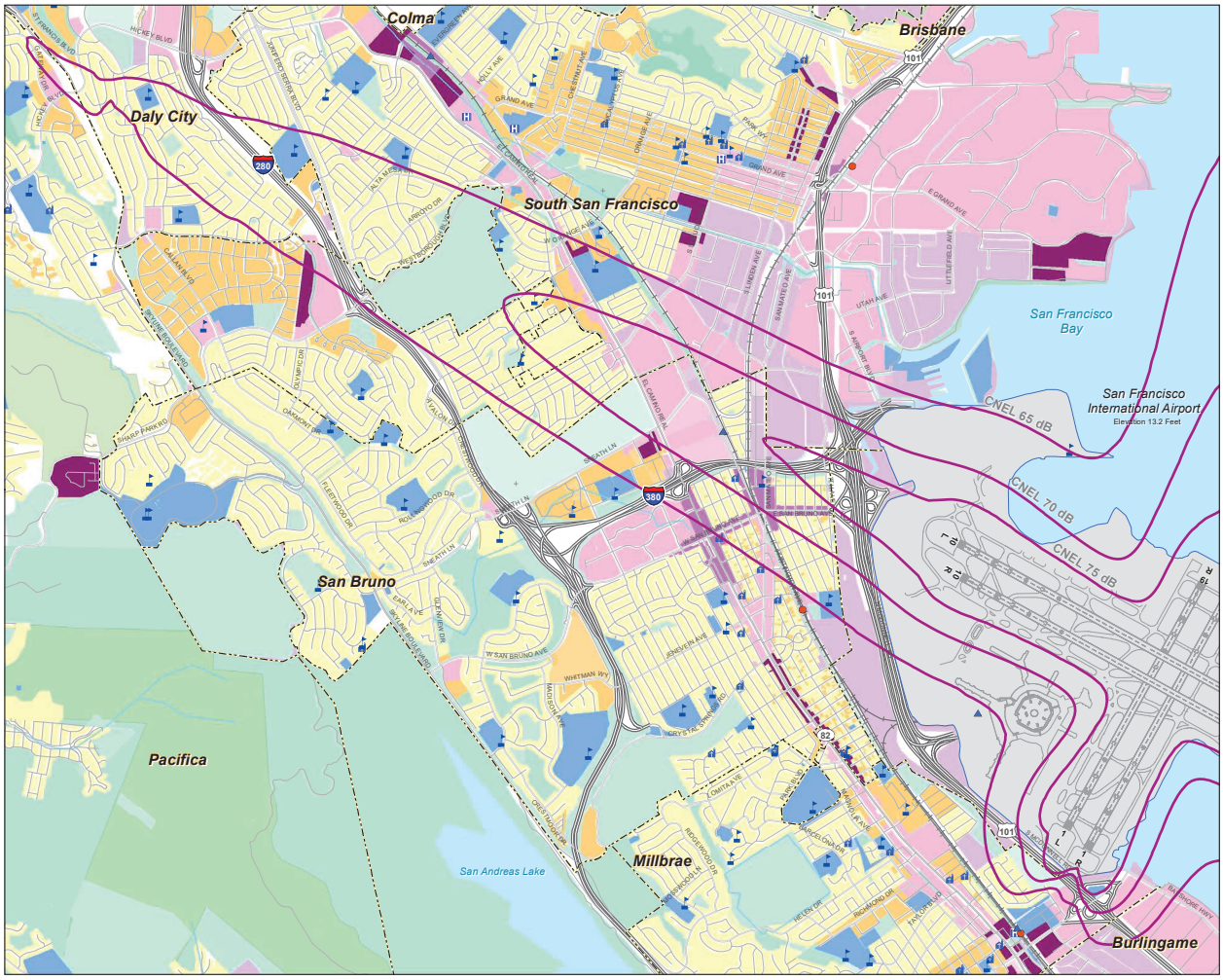
NORTH

0 0.275 0.55 1.1 Miles

Exhibit IV-5
NOISE COMPATIBILITY ZONES
Comprehensive Airport Land Use Plan
for the Environs of San Francisco International Airport

C/CAG
City/County Association of Governments
of San Mateo County, California

Docusign Envelope ID: 4913439B-9CF1-4352-91F5-E2FADDF96C1A



LEGEND

- CNEL Contour, 2020 Forecast
- Airport Property
- BART Station
- CALTRAIN Station
- School
- Place of Worship
- Hospital
- Municipal Boundary
- Railroad
- Freeway
- Road

Planned Land Use Per General Plans:

- Public
- Multi-Family Residential
- Single Family Residential
- Mixed Use
- Transit Oriented Development
- Commercial
- Industrial, Transportation, and Utilities
- Local Park, Golf Course, Cemetery
- Regional Park or Recreation Area
- Open Space
- Planned use not mapped

Sources:

Noise Contour Data:
- Draft Environmental Assessment, Proposed Runway Safety Area Program, San Francisco International Airport. URS Corporation and BridgeNet International, June 2011

County Base Maps:
- San Mateo County Planning & Building Department, 2007

Local Plans:
- Burlingame Bayfront Specific Area Plan, August 2006
- Burlingame Downtown Specific Plan, January 2009
- Burlingame General Map, September 1984
- North Burlingame/ Rollins Road Specific Plan, February 2007
- Colma Municipal Code Zoning Maps, December 2003
- Daly City General Plan Land Use Map, 1987
- Hillsborough General Plan, March 2005
- Millbrae Land Use Plan, November 1998
- Pacifica General Plan, August 1996
- San Bruno General Plan, December 2008
- San Mateo City Land Use Plan, March 2007
- San Mateo County Zoning Map, 1992
- South San Francisco General Plan, 1998

NORTH

0 0.1 0.2 0.4 Miles

Exhibit IV-6
NOISE COMPATIBILITY ZONES -- DETAIL
Comprehensive Airport Land Use Plan
for the Environs of San Francisco International Airport

C/CAG
City/County Association of Governments
of San Mateo County, California

Docusign Envelope ID: 4913439B-9CF1-4352-91F5-E2FADDF96C1A

The CNEL noise contours presented in Exhibit IV-6 designate the area where noise exposure is great enough to warrant land use controls to promote noise compatibility. It is acknowledged that aircraft noise at levels below CNEL 65 dB can be disturbing to some people.

Although the contours were established using the best available information at the time, noise contours are subject to changes that can be difficult to predict over long periods of time. The primary causes of change in the noise contours at SFO are most likely to be changes in the numbers of operations (arrivals and departures) and in the mix of aircraft using the airport. The patterns of runway use and flight tracks are unlikely to change substantially due to the nature of local weather patterns, topography, and the presence of other airports and air traffic in the metropolitan area.

NP-2 AIRPORT NOISE/LAND USE COMPATIBILITY CRITERIA

The compatibility of proposed land uses located in the Airport noise compatibility zones shall be determined according to the noise/land use compatibility criteria shown in **Table IV-1**. The criteria indicate the maximum acceptable airport noise levels, described in terms of Community Noise Equivalent Level (CNEL), for the indicated land uses. The compatibility criteria indicate whether a proposed land use is "compatible," "conditionally compatible," or "not compatible" within each zone, designated by the identified CNEL ranges.

- "Compatible" means that the proposed land use is compatible with the CNEL level indicated in the table and may be permitted without any special requirements related to the attenuation of aircraft noise.
- "Conditionally compatible" means that the proposed land use is compatible if the conditions described in Table IV-1 are met.
- "Not compatible" means that the proposed land use is incompatible with aircraft noise at the indicated CNEL level.

Docusign Envelope ID: 4913439B-9CF1-4352-91F5-E2FADDF96C1A

Table IV-1 Noise/Land Use Compatibility Criteria

	COMMUNITY NOISE EQUIVALENT LEVEL (CNEL)			
LAND USE	**BELOW 65 dB**	**65-70 dB**	**70-75 dB**	**75 dB AND OVER**
Residential				
Residential, single family detached	Y	C	N *(a)*	N
Residential, multi-family and single family attached	Y	C	N *(a)*	N
Transient lodgings	Y	C	C	N
Public/Institutional				
Public and Private Schools	Y	C	N	N
Hospitals and nursing homes	Y	C	N	N
Places of public assembly, including places of worship	Y	C	N	N
Auditoriums, and concert halls	Y	C	C	N
Libraries	Y	C	C	N
Outdoor music shells, amphitheaters	Y	N	N	N
Recreational				
Outdoor sports arenas and spectator sports	Y	Y	Y	N
Nature exhibits and zoos	Y	Y	N	N
Amusements, parks, resorts and camps	Y	Y	Y	N
Golf courses, riding stables, and water recreation	Y	Y	Y	Y
Commercial				
Offices, business and professional, general retail	Y	Y	Y	Y
Wholesale; retail building materials, hardware, farm equipment	Y	Y	Y	Y
Industrial and Production				
Manufacturing	Y	Y	Y	Y
Utilities	Y	Y	Y	Y
Agriculture and forestry	Y	Y *(b)*	Y *(c)*	Y *(c)*
Mining and fishing, resource production and extraction	Y	Y	Y	Y

Notes:

CNEL = Community Noise Equivalent Level, in A-weighted decibels.

Y (Yes) = Land use and related structures compatible without restrictions.

C (conditionally compatible) = Land use and related structures are permitted, provided that sound insulation is provided to reduce interior noise levels from exterior sources to CNEL 45 dB or lower and that an avigation easement is granted to the City and County of San Francisco as operator of SFO. See Policy NP-3.

N (No) = Land use and related structures are not compatible..

(a) Use is conditionally compatible only on an existing lot of record zoned only for residential use as of the effective date of the ALUCP. Use must be sound-insulated to achieve an indoor noise level of CNEL 45 dB or less from exterior sources. The property owners shall grant an avigation easement to the City and County of San Francisco prior to issuance of a building permit for the proposed building or structure. If the proposed development is not built, then, upon notice by the local permitting authority, SFO shall record a notice of termination of the avigation easement.

(b) Residential buildings must be sound-insulated to achieve an indoor noise level of CNEL 45 dB or less from exterior sources.

(c) Accessory dwelling units are not compatible.

SOURCES: Jacobs Consultancy Team 2010. Based on State of California General Plan Guidelines for noise elements of general plans; California Code of Regulations, Title 21, Division 2.5, Chapter 6, Section 5006; and 14 CFR Part 150, Appendix A, Table 1.

PREPARED BY; Ricondo & Associates, Inc., June 2012.

Docusign Envelope ID: 4913439B-9CF1-4352-91F5-E2FADDF96C1A

NP-3 GRANT OF AVIGATION EASEMENT

Any action that would either permit or result in the development or construction of a land use considered to be conditionally compatible with aircraft noise of CNEL 65 dB or greater shall be subject to this easement requirement. The determination of conditional compatibility shall be based on the criteria presented in Table IV-1 "Noise/Land Use Compatibility Criteria."

The San Mateo County Airport Land Use Commission (the C/CAG Board) deems it necessary to: (1) ensure the unimpeded use of airspace in the vicinity of SFO; (2) to ensure that new noise-sensitive land uses within the CNEL 65 dB contour are made compatible with aircraft noise, in accordance with California Code of Regulations, Title 21, Section 5014; and (3) to provide notice to owners of real property near the Airport of the proximity to SFO and of the potential impacts that could occur on the property from airport/aircraft operations. Thus, C/CAG shall condition its approval of proposed development upon the owner of the subject property granting an avigation easement to the City and County of San Francisco, as the proprietor of SFO. The local government with the ultimate permitting and approval authority over the proposed development shall ensure that this condition is implemented prior to final approval of the proposed development. If the approval action for the proposed development includes construction of a building(s) and/or other structures, the local permitting authority shall require the grant of an avigation easement to the City and County of San Francisco prior to issuance of a building permit(s) for the proposed building or structure. If the proposed development is not built, then, upon notice by the local permitting authority, SFO shall record a notice of termination of the avigation easement.

The avigation easement to be used in fulfilling this condition is presented in **Appendix G**.

NP-4 RESIDENTIAL USES WITHIN CNEL 70 dB CONTOUR

As described in Table IV-1, residential uses are not compatible in areas exposed to noise above CNEL 70 dB and typically should not be allowed in these high noise areas. .

NP-4.1 Situations Where Residential Use Is Conditionally Compatible

Residential uses are considered conditionally compatible in areas exposed to noise above CNEL 70 dB only if the proposed use is on a lot of record zoned exclusively for residential use as of the effective date of the ALUCP. In such a case, the residential use must be sound-insulated to achieve an indoor noise level of CNEL 45 dB or less from exterior sources. The property owner also shall grant an avigation easement to the City and County of San Francisco in accordance with Policy NP-3 prior to issuance of a building permit for the proposed building or structure.

NP-4.2 Construction of Additional Dwellings on Lots Occupied by Residential Uses is Incompatible within CNEL 70 dB Contour

The construction of second homes on lots occupied by residential uses and the creation of additional housing units in existing buildings within the CNEL 70 dB contour shall be incompatible and inconsistent with this ALUCP.

Docusign Envelope ID: 4913439B-9CF1-4352-91F5-E2FADDF96C1A

NP-4.3 Residential Subdivisions and Lot Splits are Incompatible within CNEL 70 dB Contour

The subdivision of land and the splitting of lots to enable the construction of additional housing within the CNEL 70 dB contour shall be incompatible and inconsistent with this ALUCP.

NP-4.4 Residential Rezonings are Incompatible Within CNEL 70 dB Contour

The rezoning of land for residential use within the CNEL 70 dB contour shall be considered incompatible and inconsistent with this ALUCP.

4.4 Safety Compatibility Policies

The safety compatibility policies are established with a twofold purpose:

1. To protect the public health, safety, and welfare by minimizing the public's exposure to the risk associated with potential aircraft accidents in the Airport vicinity.
2. To protect the public interest in providing for the orderly development of SFO by preventing the creation of new safety problems in the Airport environs.

Compared to noise, safety is a much more difficult concern to address in airport/land use compatibility policies. A major reason is that safety policies address uncertain events that may occasionally occur with aircraft operations, whereas noise policies deal with known, more or less predictable, events that occur with every aircraft operation.

Because aircraft accidents happen infrequently, and the time, place, and consequences of their occurrence cannot be accurately predicted, the concept of risk is central to the assessment of safety compatibility. In terms of airport/land use compatibility planning, two questions must be addressed to determine the relative degree of risk posed by potential aircraft accidents in various locations:

- Accident Frequency – Where and when do aircraft accidents typically occur in the vicinity of an airport?
- Accident Severity – What aircraft and land use characteristics contribute to the consequences of an accident when one occurs?

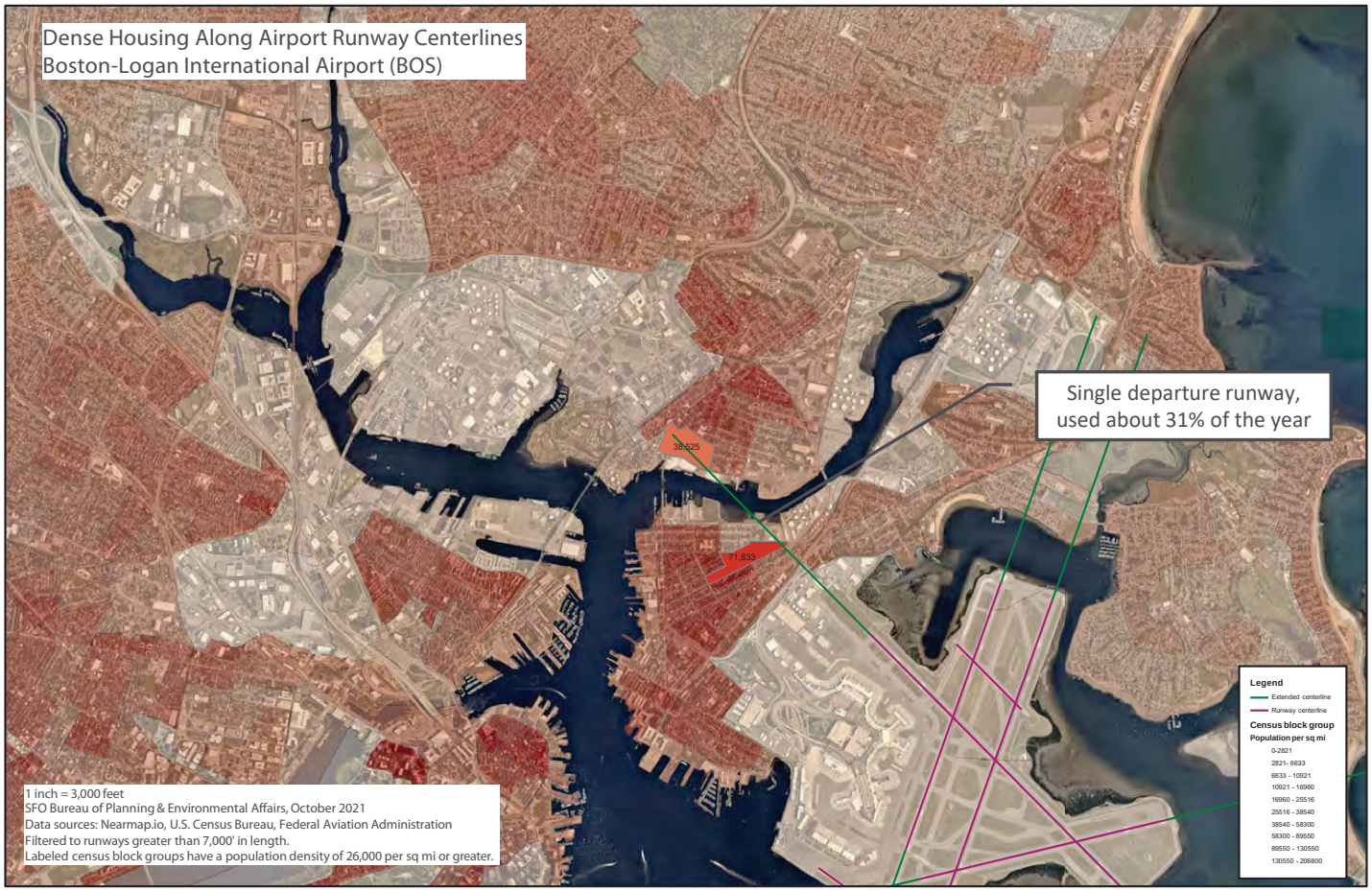
The overall objective of safety compatibility guidelines is to minimize the risks associated with potential aircraft accidents. There are two components to this objective:

- Safety of Persons on the Ground – The most fundamental safety compatibility component is to provide for the safety of people and property on the ground in the event of an aircraft accident near an airport.
- Safety of Aircraft Occupants – The other safety compatibility component is to enhance the chances of survival of the occupants of an aircraft involved in an accident that occurs beyond the runway environment.

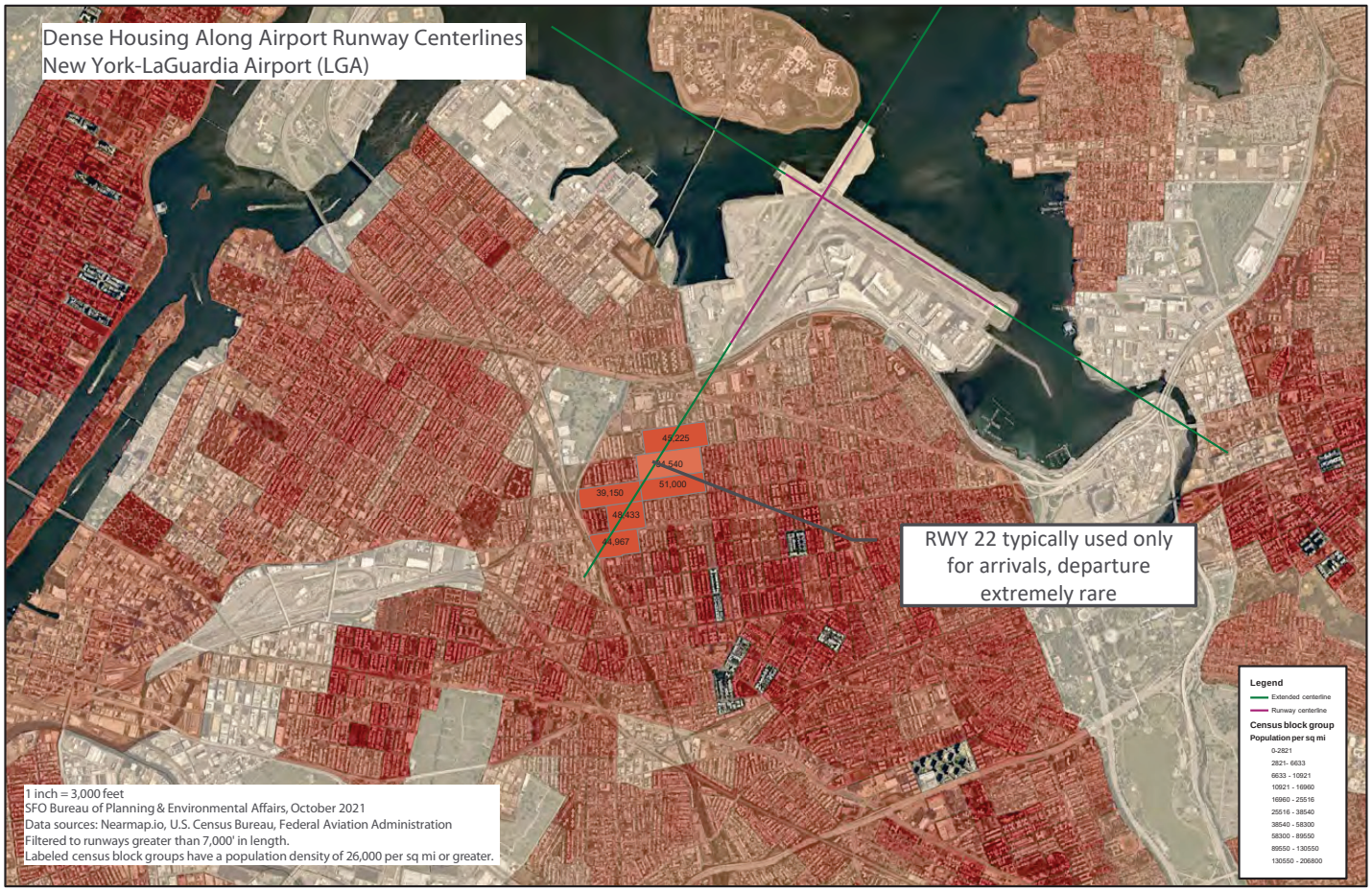
Docusign Envelope ID: 4913439B-9CF1-4352-91F5-E2FADDF96C1A

Attachment C:
Housing Density Along Runway Centerlines at U.S. Airports

Docusign Envelope ID: 4913439B-9CF1-4352-91F5-E2FADDF96C1A



Docusign Envelope ID: 4913439B-9CF1-4352-91F5-E2FADDF96C1A



Docusign Envelope ID: 4913439B-9CF1-4352-91F5-E2FADDF96C1A



Docusign Envelope ID: 4913439B-9CF1-4352-91F5-E2FADDF96C1A

Attachment D:

SFO ALUCP Safety Compatibility Policies

Docusign Envelope ID: 4913439B-9CF1-4352-91F5-E2FADDF96C1A

NP-4.3 Residential Subdivisions and Lot Splits are Incompatible within CNEL 70 dB Contour

The subdivision of land and the splitting of lots to enable the construction of additional housing within the CNEL 70 dB contour shall be incompatible and inconsistent with this ALUCP.

NP-4.4 Residential Rezonings are Incompatible Within CNEL 70 dB Contour

The rezoning of land for residential use within the CNEL 70 dB contour shall be considered incompatible and inconsistent with this ALUCP.

4.4 Safety Compatibility Policies

The safety compatibility policies are established with a twofold purpose:

1. To protect the public health, safety, and welfare by minimizing the public's exposure to the risk associated with potential aircraft accidents in the Airport vicinity.
2. To protect the public interest in providing for the orderly development of SFO by preventing the creation of new safety problems in the Airport environs.

Compared to noise, safety is a much more difficult concern to address in airport/land use compatibility policies. A major reason is that safety policies address uncertain events that may occasionally occur with aircraft operations, whereas noise policies deal with known, more or less predictable, events that occur with every aircraft operation.

Because aircraft accidents happen infrequently, and the time, place, and consequences of their occurrence cannot be accurately predicted, the concept of risk is central to the assessment of safety compatibility. In terms of airport/land use compatibility planning, two questions must be addressed to determine the relative degree of risk posed by potential aircraft accidents in various locations:

- Accident Frequency – Where and when do aircraft accidents typically occur in the vicinity of an airport?
- Accident Severity – What aircraft and land use characteristics contribute to the consequences of an accident when one occurs?

The overall objective of safety compatibility guidelines is to minimize the risks associated with potential aircraft accidents. There are two components to this objective:

- Safety of Persons on the Ground – The most fundamental safety compatibility component is to provide for the safety of people and property on the ground in the event of an aircraft accident near an airport.
- Safety of Aircraft Occupants – The other safety compatibility component is to enhance the chances of survival of the occupants of an aircraft involved in an accident that occurs beyond the runway environment.

Docusign Envelope ID: 4913439B-9CF1-4352-91F5-E2FADDF96C1A

The Caltrans *Airport Land Use Planning Handbook* provides guidance on the delineation of safety zones and the application of land use policies in those zones. [5] The safety zones at SFO are based on the *Handbook* guidance, with adjustments to reflect the specific operating characteristics of the Airport. The safety compatibility policy framework is also based on *Handbook* guidance. The safety compatibility policies of this ALUCP were designed to work in tandem with the airspace protection policies, described in Section 4.5. The land use compatibility standards established in Table IV-2 restrict the development of land uses that could pose particular hazards to the public or to vulnerable populations in case of an aircraft accident.[6] The maximum building height limits established under the airspace protection policies in Section 4.5 are set at the lowest elevation of the combined airspace surfaces at SFO, including Part 77 airport obstruction surfaces, TERPS obstacle clearance surfaces, and one-engine inoperative clearance surfaces. The airspace surfaces are generally lowest immediately off the runway ends in the safety zones. This maximum height restriction effectively limits the maximum density of residential uses and the intensity of nonresidential uses.[7]

The following safety compatibility policies (SP) shall apply to the ALUCP.

SP-1 SAFETY COMPATIBILITY ZONES

Exhibit IV-7 depicts the safety compatibility zones in the vicinity of SFO. Five zones are established, as follows:

- **Zone 1 -- Runway Protection Zone and Object Free Area (RPZ-OFA):** Zone 1 includes the RPZ and the OFA, areas defined according to FAA airport design criteria. [8] The RPZ is a trapezoid-shaped area off each runway end, with the dimensions based on the runway approach visibility minimums and the type of aircraft using the runway. The OFA is a rectangular area centered on each runway within which objects, other than those serving a specific aeronautical purpose, are to be prohibited. Zone 1is an area of relatively high accident risk that FAA encourages airport proprietors to own and keep free of objects, structures, and incompatible uses, including places of assembly (housing, churches, schools, shopping centers, hospitals, and the like), fuel storage, and wildlife attractants.
- **Zone 2 -- Inner Approach/Departure Zone (IADZ):** Zone 2, the IADZ, is designated along the extended centerline of each runway beginning at the outer edge of the RPZ. It is an area of secondary accident risk that tends to be overflown by most aircraft arrivals and departures off each runway end.
- **Zone 3 -- Inner Turning Zone (ITZ):** Zone 3, the ITZ, lies alongside the RPZ and IADZ. It is an area overflown by aircraft making turns at low altitude immediately after takeoff. It tends

[5] California Department of Transportation, Division of Aeronautics, *California Airport Land Use Planning Handbook*, October 2011, pp. 3-11 – 3-28, 4-13 – 4-34, and Appendices E and F.

[6] For purposes of this ALUCP, vulnerable populations are those with effective limited mobility, including hospital and nursing home patients and children in schools and day care centers.

[7] The Caltrans *Handbook* measures residential density in dwelling units per acre and nonresidential intensity in people (occupants) per acre. The rationale for the definition of safety zones and policies is discussed in greater detail in **Appendix E** of this ALUCP.

[8] FAA Advisory Circular 150/5300-13, Airport Design, Section 211 and 307.

Docusign Envelope ID: 4913439B-9CF1-4352-91F5-E2FADDF96C1A

to be subject to lower accident risk than the IADZ.

- **Zone 4 -- Outer Approach/Departure Zone (OADZ):** Zone 4, the OADZ, extends along the extended runway centerline immediately beyond the IADZ. It is subject to overflights of aircraft on approach and straight-out departures. At SFO, the OADZ off the west end of Runways 10R-28L and 10L-28R is overflown by a high proportion of departures using Runways 28L and 28R, especially long-haul departures by heavy, wide-body aircraft.
- **Zone 5 – Sideline Zone (SZ):** Zone 5, the SZ, is a rectangular area centered on each runway centerline with a width of 2,000 feet and a length extending 200 feet beyond each runway end. This area is subject to accident risks associated with aircraft losing directional control on takeoff or after landing. At SFO, the SZ is entirely on Airport property.

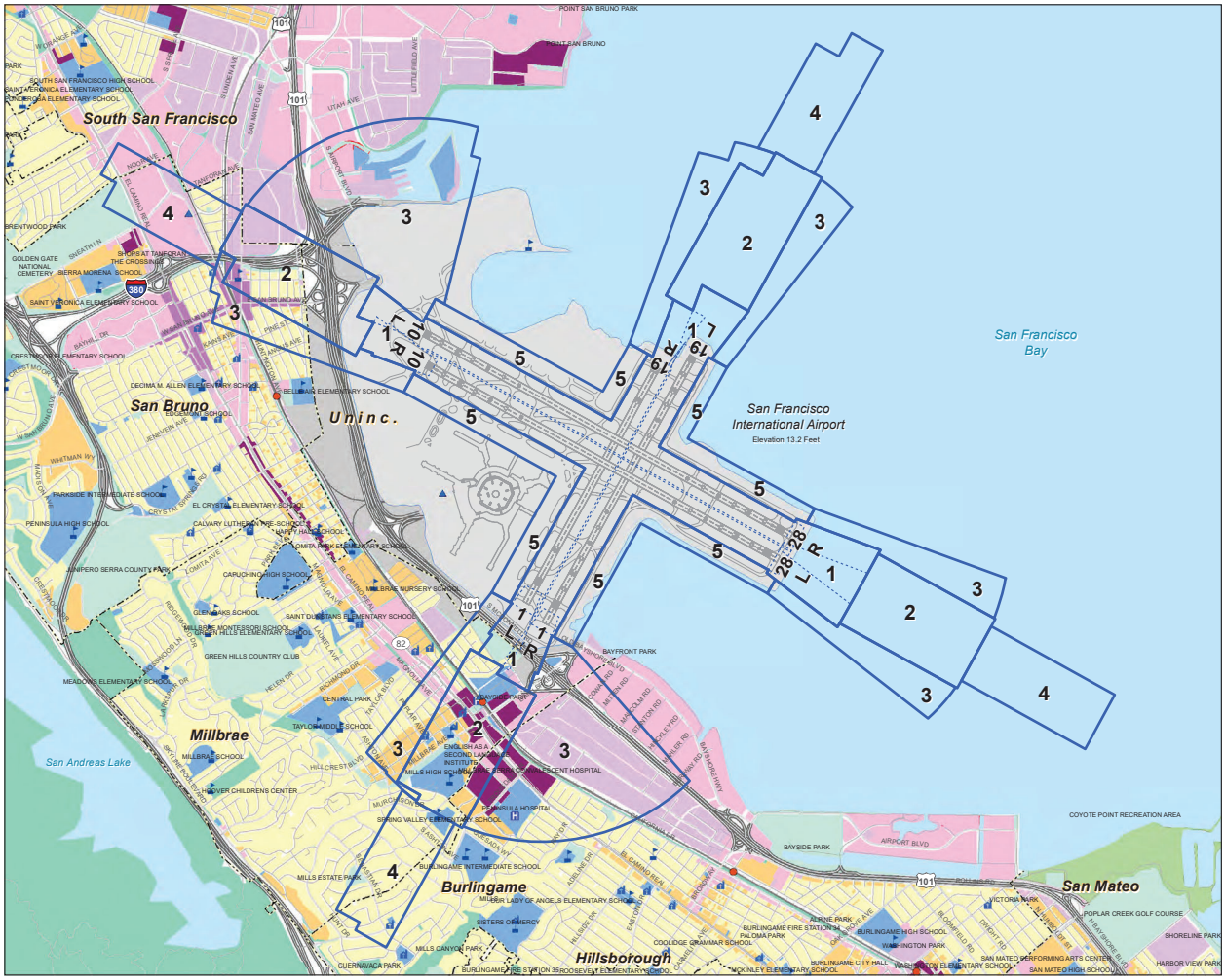
Exhibit IV-8 presents a close-up view of the safety zones off the west end of Runways 10L-28R and 10R-28L. The RPZs have the following dimensions: 500-foot inner width, 1,010-foot outer width, and 1,700-foot length.

Zone 2 (the IADZ) off each runway extends 4,300 feet beyond the RPZ, with the lateral boundaries extending 750 feet on either side of the extended runway centerline. Zone 4, (the OADZ) extends 4,000 feet beyond Zone 2, with the lateral boundaries extending 500 feet either side of the extended runway centerline.

Zone 3, (the ITZ) extends 6,000 feet from the inner edge of the RPZ on both sides of Zone 2. On the north side, the shape of Zone 3 is designed to capture the area overflown by departures turning right on standard instrument departure routes.[9] The eastern boundary follows a radial 75 degrees northeast of the extended runway centerline.

[9] Three published instrument departures at SFO require aircraft using Runways 28L and 28R to turn right immediately after takeoff – the Quiet Two, the Rebas, and the Shoreline One departures. http://www.airnav.com/airport/KSFO, accessed February 20, 2012.

Docusign Envelope ID: 4913439B-9CF1-4352-91F5-E2FADDF96C1A



LEGEND

Safety Compatibility Zones

- 1 - Runway Protection Zone-Object Free Area
- 2 - Inner Approach/Departure Zone
- 3 - Inner Turning Zone
- 4 - Outer Approach/Departure Zone
- 5 - Sideline Zonee

Internal boundaries of ALP-defined areas

Airport Property

- BART Station
- CALTRAIN Station
- School
- Place of Worship
- Hospital
- Municipal Boundary
- Railroad
- Freeway
- Road

Planned Land Use Per General Plans:

- Public
- Multi-Family Residential
- Single Family Residential
- Mixed Use
- Transit Oriented Development
- Commercial
- Industrial, Transportation, and Utilities
- Local Park, Golf Course, Cemetery
- Regional Park or Recreation Area
- Open Space
- Planned use not mapped

Sources:

Safety Compatibility Zones:
- Jacobs Consultancy Team, 2009; Ricondo & Associates, Inc., 2011

County Base Maps:
- San Mateo County Planning & Building Department, 2007

Local Plans:
- Burlingame Bayfront Specific Area Plan, August 2006
- Burlingame Downtown Specific Plan, January 2009
- Burlingame General Map, September 1984
- North Burlingame/ Rollins Road Specific Plan, February 2007
- Colma Municipal Code Zoning Maps, December 2003
- Daly City General Plan Land Use Map, 1987
- Hillsborough General Plan, March 2005
- Millbrae Land Use Plan, November 1998
- Pacifica General Plan, August 1996
- San Bruno General Plan, December 2008
- San Mateo City Land Use Plan, March 2007
- San Mateo County Zoning Map, 1992
- South San Francisco General Plan, 1998

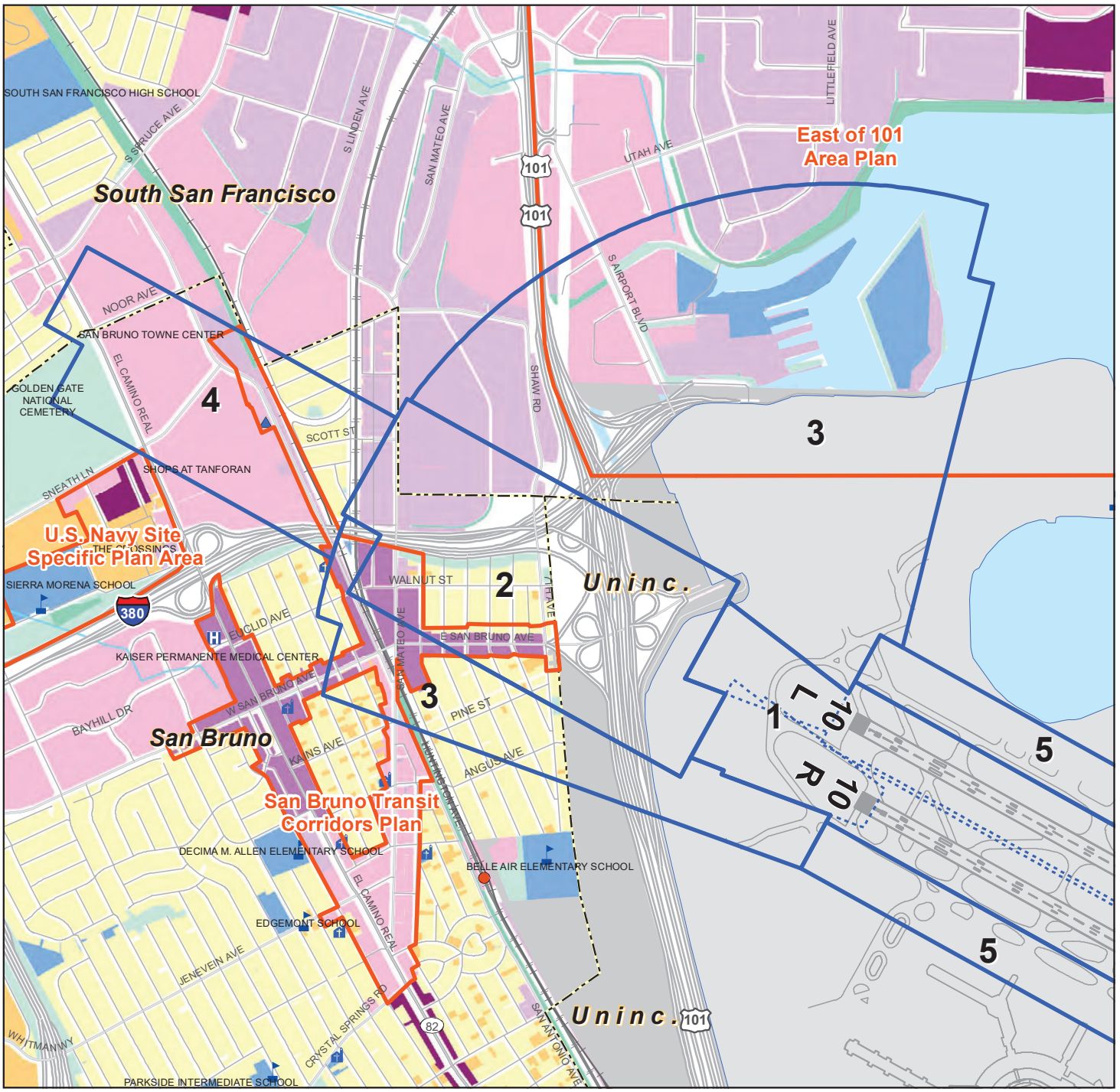
NORTH

0 0.125 0.25 0.5 Miles

Exhibit IV-7
SAFETY COMPATIBILITY ZONES
Comprehensive Airport Land Use Plan
for the Environs of San Francisco International Airport

C/CAG
City/County Association of Governments
of San Mateo County, California

Docusign Envelope ID: 4913439B-9CF1-4352-91F5-E2FADDF96C1A



LEGEND

Safety Compatibility Zones

- 1 - Runway Protection Zone-Object Free Area
- 2 - Inner Approach/Departure Zone
- 3 - Inner Turning Zone
- 4 - Outer Approach/Departure Zone
- 5 - Sideline Zones
- Internal boundaries of ALP-defined areas
- Specific Plan Area
- Airport Property
- BART Station
- CALTRAIN Station
- School
- Place of Worship
- Hospital
- Municipal Boundary
- Railroad
- Freeway
- Major Road
- Road

Planned Land Use Per General Plans

- Public
- Multi-Family Residential
- Single Family Residential
- Mixed Use
- Transit Oriented Development
- Commercial
- Industrial, Transportation, and Utilities
- Local Park, Golf Course, Cemetery
- Regional Park or Recreation Area
- Open Space

NORTH

0 0.125 0.25 0.5 Miles

Sources:

Local Plans:
- San Bruno General Plan, December 2008
- South San Francisco General Plan, 1998

Exhibit IV-8

SAFETY COMPATIBILITY ZONES IN THE CITIES OF SOUTH SAN FRANCISCO AND SAN BRUNO

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

C/CAG

City/County Association of Governments
of San Mateo County, California

Docusign Envelope ID: 4913439B-9CF1-4352-91F5-E2FADDF96C1A

Exhibit IV-9 depicts the safety zones off the south end of Runways 1L-19R and 1R-19L. In Zone 1, the RPZs have a 500-foot inner width, 1,010-foot outer width and 1,700-foot length. Zone 2 (the IADZ) extends 4,300 feet from the outer edge of the RPZ and is 1,500 feet wide, centered on the extended runway centerline. Zone 3 (the ITZ) extends 6,000 feet from the inner edge of each RPZ. On the east side, Zone 3 is fanned 70 degrees east of the extended runway centerline. This reflects the left departure turns made by nearly all aircraft taking off on Runways 19L and 19R and 19R.[10] Zone 4, the OADZ, extends 4,000 feet beyond the end of Zone 2.

SP-2 SAFETY COMPATIBILITY LAND USE CRITERIA

The land use compatibility criteria for safety are established in **Table IV-2**. The safety compatibility criteria are generally based on the guidelines provided in the *California Airport Land Use Planning Handbook*, although modifications have been made in recognition of the intense level of existing development in the airport vicinity. See Appendix E for a discussion of the factors that were considered in establishing the safety compatibility policies.

The criteria include two categories – uses that are incompatible and uses that should be avoided in the respective zones.

- Incompatible Uses – uses that are incompatible within the safety zone.
- Uses to be Avoided – uses that should not be allowed in the safety zone unless no feasible alternative is available, as determined by the land use agency with permitting authority. Where these uses are allowed, habitable structures shall be provided with at least 50 percent more exits than required by applicable codes. If the 50 percent calculation results in a fraction, the fractional number shall be rounded up to the next whole number.

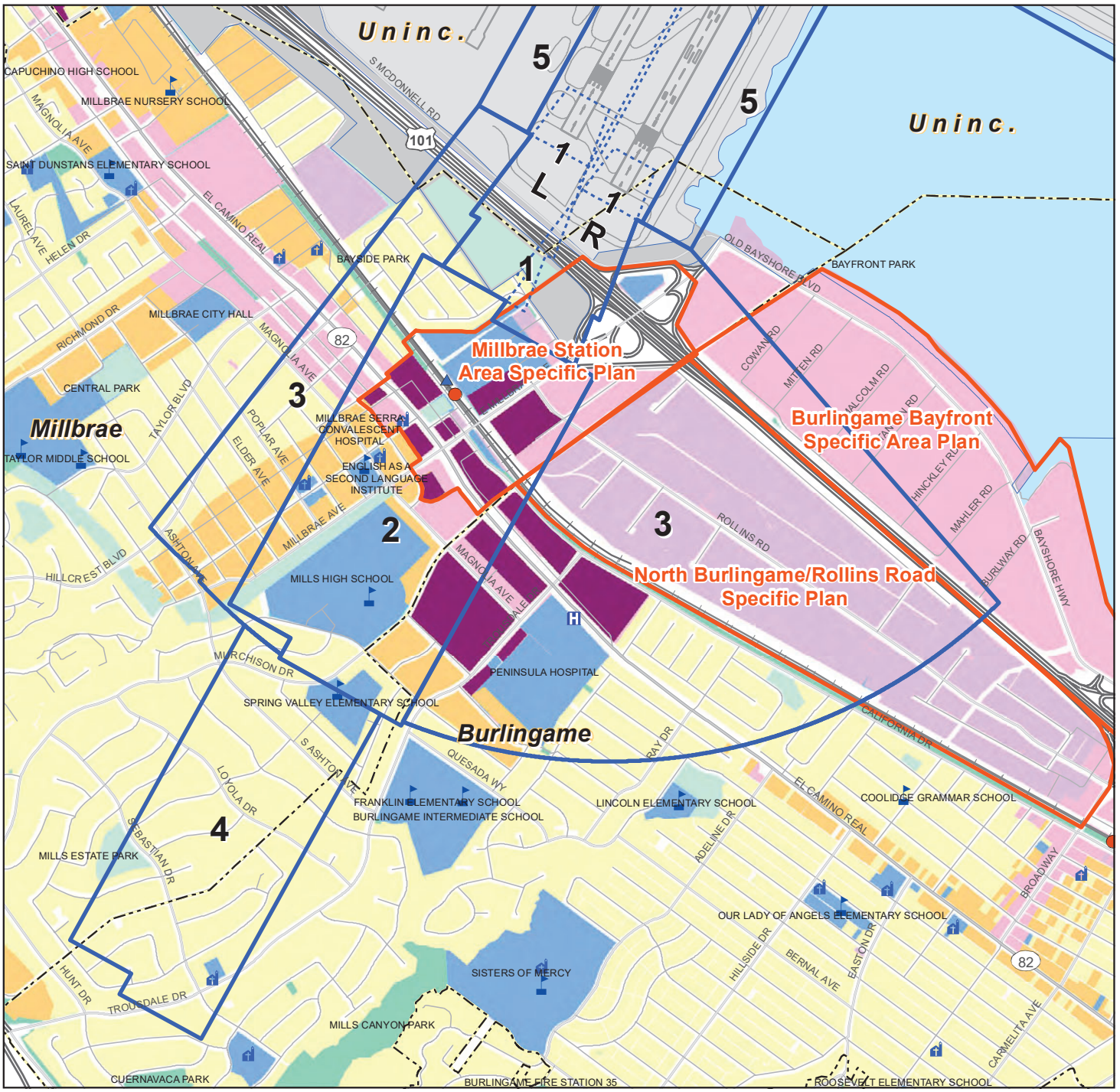
ZONE 1 – RUNWAY PROTECTION ZONE AND OBJECT FREE AREA (RPZ-OFA)

Zone 1 is the zone where the accident risk is highest. At SFO, the RPZs for Runways 10R and 10L are on Airport property or on public highway right-of-way. Most of the RPZs for Runways 1L and 1R are on Airport property or public right-of-way. Part of the RPZs lie in Bayside Park and small areas extend onto private property. All of the OFAs (Object Free Areas) are on Airport property.

The compatibility criteria presented in Table IV-2 declare that all new structures in Zone 1 are incompatible. All but very low intensity nonresidential uses, at the outer edges of the RPZs, are to be avoided. Examples of potentially acceptable nonresidential uses include parking lots and outdoor equipment storage.

[10] All published instrument departure procedures for Runways 19L and 19R require aircraft to turn left immediately after takeoff. http://www.airnav.com/airport/KSFO, accessed February 20, 2012.

Docusign Envelope ID: 4913439B-9CF1-4352-91F5-E2FADDF96C1A



LEGEND

Safety Compatibility Zones

- 1 - Runway Protection Zone-Object Free Area
- 2 - Inner Approach/Departure Zone
- 3 - Inner Turning Zone
- 4 - Outer Approach/Departure Zone
- 5 - Sideline Zones
- Internal boundaries of ALP-defined areas
- Specific Plan Area
- Airport Property
- BART Station
- CALTRAIN Station
- School
- Place of Worship
- Hospital
- Municipal Boundary
- Railroad
- Freeway
- Major Road
- Road

Planned Land Use Per General Plans

- Public
- Multi-Family Residential
- Single Family Residential
- Mixed Use
- Transit Oriented Development
- Commercial
- Industrial, Transportation, and Utilities
- Local Park, Golf Course, Cemetery
- Regional Park or Recreation Area
- Open Space

NORTH

0 0.125 0.25 0.5 Miles

Sources:

Local Plans:
- San Bruno General Plan, December 2008
- South San Francisco General Plan, 1998

ExhibitIV-9

SAFETY COMPATIBILITY ZONES
IN THE CITIES OF BURLINGAME AND MILLBRAE

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

C/CAG

City/County Association of Governments
of San Mateo County, California

Docusign Envelope ID: 4913439B-9CF1-4352-91F5-E2FADDF96C1A

Table IV-2 (1 of 2) Safety Compatibility Criteria

	LAND USE CRITERIA	
ZONE	**INCOMPATIBLE**[1/]	**AVOID**[1/]
Zone 1: Runway Protection Zone and Object Free Area (RPZ-OFA)		
	All new structures[3/] Places of assembly not in structures Hazardous uses[2/] Critical public utilities[2/]	Nonresidential uses except very low intensity uses[4/] in the "controlled activity area." [2/]
Zone 2: Inner Approach/Departure Zone (IADZ)		
	Children's schools[2/] Large child day care centers and noncommercial employer-sponsored centers ancillary to a place of business[2/] Hospitals, nursing homes Hazardous uses[2/] Critical public utilities[2/] Theaters, meeting halls, places of assembly seating more than 300 people Stadiums, arenas	---
Zone 3: Inner Turning Zone (ITZ)		
	Biosafety Level 3 and 4 facilities [2/] Children's schools [2/] Large child day care centers [2/] Hospitals, nursing homes Stadiums, arenas	Hazardous uses other than Biosafety Level 3 and 4 facilities[2/] Critical public utilities[2/]
Zone 4: Outer Approach/Departure Zone (OADZ)		
	Biosafety Level 3 and 4 facilities[2/] Children's schools [2/] Large child day care centers [2/] Hospitals, nursing homes Stadiums, arenas	Hazardous uses other than Biosafety Level 3 and 4 facilities [2/] Critical public utilities[2/]
Zone 5: Sideline Zone (SZ)		
	Children's schools[2/] Large child day care facilities and noncommercial employer-sponsored centers ancillary to a place of business Hospitals, nursing homes Hazardous uses[2/] Critical public utilities[2/] Stadiums, arenas	---

Docusign Envelope ID: 4913439B-9CF1-4352-91F5-E2FADDF96C1A

Table IV-2 (2 of 2) Safety Compatibility Criteria

Notes:

1/ *Avoid:* Use is not fully compatible and should not be permitted unless no feasible alternative is available. Where use is allowed, habitable structures shall be provided with at least 50 percent more exits than required by applicable codes. Where the 50-percent factor results in a fraction, the number of additional exits shall be rounded to the next highest whole number.

Incompatible Use is not compatible in the indicated zones and cannot be permitted.

2/ Definitions

- *Biosafety Level 3 and 4 facilities:* Medical and biological research facilities involving the storage and processing of extremely toxic or infectious agents. See Policy SP-3 for additional detail.
- *Children's schools:* Public and private schools serving preschool through grade 12, excluding commercial services.
- *Controlled Activity Area: The lateral edges of the RPZ, outside the Runway Safety Area (RSA) and the extension of the RSA, which extends to the outer edge of the RPZ. See FAA Advisory Circular 150/5300-13, Airport Design, Section 212a.(1)(b).*
- *Critical public utilities:* Facilities that, if disabled by an aircraft accident, could lead to public safety or health emergencies. They include the following: electrical power generation plants, electrical substations, wastewater treatment plants, and public water treatment facilities.
- *Hazardous uses:* Uses involving the manufacture, storage, or processing of flammable, explosive ,or toxic materials that would substantially aggravate the consequences of an aircraft accident. See Policy SP-3 for additional detail.
- *Large child day care centers:* Commercial facilities defined in accordance with Health and Safety Code, Section 1596.70, et seq., and licensed to serve 15 or more children. Family day care homes and noncommercial employer-sponsored facilities ancillary to place of business are allowed.

3/ Structures serving specific aeronautical functions are allowed, in compliance with applicable FAA design standards.

4/ Examples include parking lots and outdoor equipment storage.

SOURCE: Ricondo & Associates, Inc., June 2012.
PREPARED BY: Ricondo & Associates, Inc., June 2012.

ZONE 2 -- INNER APPROACH/DEPARTURE ZONE (IADZ)

In Zone 2, the IADZ, a variety of uses that involve hazardous materials, critical public utilities, theaters, meeting halls, places of assembly seating more than 300 people, stadiums, arenas, and those accommodating potentially vulnerable populations – such as children's schools, child day care facilities, hospitals, and nursing homes – are incompatible.

ZONE 3 -- INNER TURNING ZONE (ITZ)

The compatibility criteria in Zone 3, the ITZ, are somewhat less restrictive than in Zone 2. This is because the area is subject to less accident risk by virtue of the lower density of overflights in this area. In Zone 3, stadiums, arenas, and uses accommodating potentially vulnerable populations are incompatible. Hazardous uses and critical public utilities are not incompatible in Zone 3, but are classified as uses to be avoided. This means that they should not be permitted unless no feasible alternative is available.

ZONE 4 - OUTER APPROACH/DEPARTURE ZONE (OADZ)

The compatibility criteria in Zone 4,the OADZ, are the same as in Zone 3.

Docusign Envelope ID: 4913439B-9CF1-4352-91F5-E2FADDF96C1A

ZONE 5 – SIDELINE ZONE (SZ)

The compatibility criteria in Zone 5 are the same as those in Zone 2.

SP-3 HAZARDOUS USES

Hazardous uses, facilities involving the manufacture, processing, or storage of hazardous materials, can pose serious risks to the public in case of aircraft accidents. Hazardous materials of particular concern in this ALUCP, and which are covered by the safety compatibility criteria in Table IV-2, are the following:

A. Aboveground fuel storage — This includes storage tanks with capacities greater than 10,000 gallons of any substance containing at least 5 percent petroleum.[11] Project sponsors must provide evidence of compliance with all applicable regulations prior to the issuance of development permits.

B. Facilities where toxic substances are manufactured, processed or stored — Proposed land use projects involving the manufacture or storage of toxic substances may be allowed if the amounts of the substances do not exceed the threshold planning quantities for hazardous and extremely hazardous substances specified by the EPA.[12]

C. Explosives and fireworks manufacturing and storage — Proposed land use projects involving the manufacture or storage of explosive materials may be allowed in safety zones only in compliance with the applicable regulations of the California Division of Occupational Safety and Health (Section 5252, Table EX-1). Project sponsors must provide evidence of compliance with applicable state regulations prior to the issuance of any development permits.[13]

D. Medical and biological research facilities handling highly toxic or infectious agents — These facilities are classified by "Biosafety Levels."[14] Biosafety Level 1 does not involve hazardous materials and is not subject to the restrictions on hazardous uses in Table IV-2. Definitions of the other three biosafety levels are quoted from *Biosafety in Microbiological and Biomedical Laboratories*, below.[15]

a. Biosafety Level 2 practices, equipment, and facility design and construction are applicable to clinical, diagnostic, teaching, and other laboratories in which work is done with the broad spectrum of indigenous moderate-risk agents that are present in the community

[11] State of California, California Health and Safety Code, Section 25270 (*Aboveground Petroleum Storage Act*).

[12] Title 40 Code of Federal Regulations Part 355, Subpart D, Appendices A & B.

[13] California Code of Regulations, Title 8, Subchapter 7 *General Industry Safety Orders*, Group 18 *Explosives and Pyrotechnics*, Article 114 *Storage of Explosives*.

[14] *Biosafety in Microbiological and Biomedical Laboratories*, 5th Edition, 2009, published by the U.S. Department of Health and Human Services in concert with the Public Health Service, Centers for Disease Control and Prevention, and National Institutes of Health, or any successor publication.

[15] *Biosafety in Microbiological and Biomedical Laboratories*, 5th Edition, 2009, published by the U.S. Department of Health and Human Services in concert with the Public Health Service, Centers for Disease Control and Prevention, and National Institutes of Health, pp. 25-26.

Docusign Envelope ID: 4913439B-9CF1-4352-91F5-E2FADDF96C1A

and associated with human disease of varying severity.

b. Biosafety Level 3 practices, safety equipment, and facility design and construction are applicable to clinical, diagnostic, teaching, research, or production facilities in which work is done with indigenous or exotic agents with a potential for respiratory transmission, and which may cause serious and potentially lethal infection.

c. Biosafety Level 4 practices, safety equipment, and facility design and construction are applicable for work with dangerous and exotic agents that pose a high individual risk of life-threatening disease, which may be transmitted via the aerosol route and for which there is no available vaccine or therapy.

4.5 Airspace Protection

The compatibility of proposed land uses with respect to airspace protection shall be evaluated in accordance with the policies set forth in this section. These policies are established with a twofold purpose:

1. To protect the public health, safety, and welfare by minimizing the public's exposure to potential safety hazards that could be created through the construction of tall structures.

2. To protect the public interest in providing for the orderly development of SFO by ensuring that new development in the Airport environs avoids compromising the airspace in the Airport vicinity. This avoids the degradation in the safety, utility, efficiency, and air service capability of the Airport that could be caused by the attendant need to raise visibility minimums, increase minimum rates of climb, or cancel, restrict, or redesign flight procedures.

4.5.1 FEDERAL REGULATIONS REGARDING TALL STRUCTURES

14 Code of Federal Regulations (CFR) Part 77, *Safe, Efficient Use and Preservation of the Navigable Airspace*, governs the FAA's review of proposed construction exceeding certain height limits, defines airspace obstruction criteria, and provides for FAA aeronautical studies of proposed construction. **Appendix F** describes the FAA airspace review process and the extent of FAA authority related to airspace protection.

4.5.2 PART 77, SUBPART B, NOTIFICATION PROCESS

Federal regulations require any person proposing to build a new structure or alter an existing structure with a height that would exceed the elevations described in CFR Part 77, Subpart B, Section 77.9, to prepare an FAA Form 7460-1, *Notice of Proposed Construction or Alteration*, and submit the notice to the FAA. The regulations apply to buildings and other structures or portions of structures, such as mechanical equipment, flag poles, and other projections that may exceed the aforementioned elevations.

Docusign Envelope ID: 4913439B-9CF1-4352-91F5-E2FADDF96C1A

Attachment E:

SFO ALUCP Airspace Protection Policies

Docusign Envelope ID: 4913439B-9CF1-4352-91F5-E2FADDF96C1A

and associated with human disease of varying severity.

b. Biosafety Level 3 practices, safety equipment, and facility design and construction are applicable to clinical, diagnostic, teaching, research, or production facilities in which work is done with indigenous or exotic agents with a potential for respiratory transmission, and which may cause serious and potentially lethal infection.

c. Biosafety Level 4 practices, safety equipment, and facility design and construction are applicable for work with dangerous and exotic agents that pose a high individual risk of life-threatening disease, which may be transmitted via the aerosol route and for which there is no available vaccine or therapy.

4.5 Airspace Protection

The compatibility of proposed land uses with respect to airspace protection shall be evaluated in accordance with the policies set forth in this section. These policies are established with a twofold purpose:

1. To protect the public health, safety, and welfare by minimizing the public's exposure to potential safety hazards that could be created through the construction of tall structures.

2. To protect the public interest in providing for the orderly development of SFO by ensuring that new development in the Airport environs avoids compromising the airspace in the Airport vicinity. This avoids the degradation in the safety, utility, efficiency, and air service capability of the Airport that could be caused by the attendant need to raise visibility minimums, increase minimum rates of climb, or cancel, restrict, or redesign flight procedures.

4.5.1 FEDERAL REGULATIONS REGARDING TALL STRUCTURES

14 Code of Federal Regulations (CFR) Part 77, *Safe, Efficient Use and Preservation of the Navigable Airspace*, governs the FAA's review of proposed construction exceeding certain height limits, defines airspace obstruction criteria, and provides for FAA aeronautical studies of proposed construction. **Appendix F** describes the FAA airspace review process and the extent of FAA authority related to airspace protection.

4.5.2 PART 77, SUBPART B, NOTIFICATION PROCESS

Federal regulations require any person proposing to build a new structure or alter an existing structure with a height that would exceed the elevations described in CFR Part 77, Subpart B, Section 77.9, to prepare an FAA Form 7460-1, *Notice of Proposed Construction or Alteration*, and submit the notice to the FAA. The regulations apply to buildings and other structures or portions of structures, such as mechanical equipment, flag poles, and other projections that may exceed the aforementioned elevations.

Docusign Envelope ID: 4913439B-9CF1-4352-91F5-E2FADDF96C1A

Exhibit IV-10 depicts the approximate elevations at which the 14 CFR Part 77 notification requirements would be triggered; see **Exhibit IV-11** for a close-up view of the northern half and **Exhibit IV-12** for a close-up view of the southern half of the area. These exhibits are provided for informational purposes only. Official determinations of the areas and elevations within which the federal notification requirements apply are subject to the authority of the FAA. The FAA is empowered to require the filing of notices for proposed construction based on considerations other than height. For example, in some areas of complex airspace and high air traffic volumes, the FAA may be concerned about the potential for new construction of any height to interfere with electronic navigation aids. In these areas, the FAA will want to review all proposed construction projects.

The FAA has developed an on-line tool for project sponsors to use in determining whether they are required to file a Notice of Proposed Construction or Alteration. Sponsors of proposed projects are urged to refer to this website to determine whether they are required to file Form 7460-1 with the FAA:

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

4.5.3 AIRSPACE MAPPING

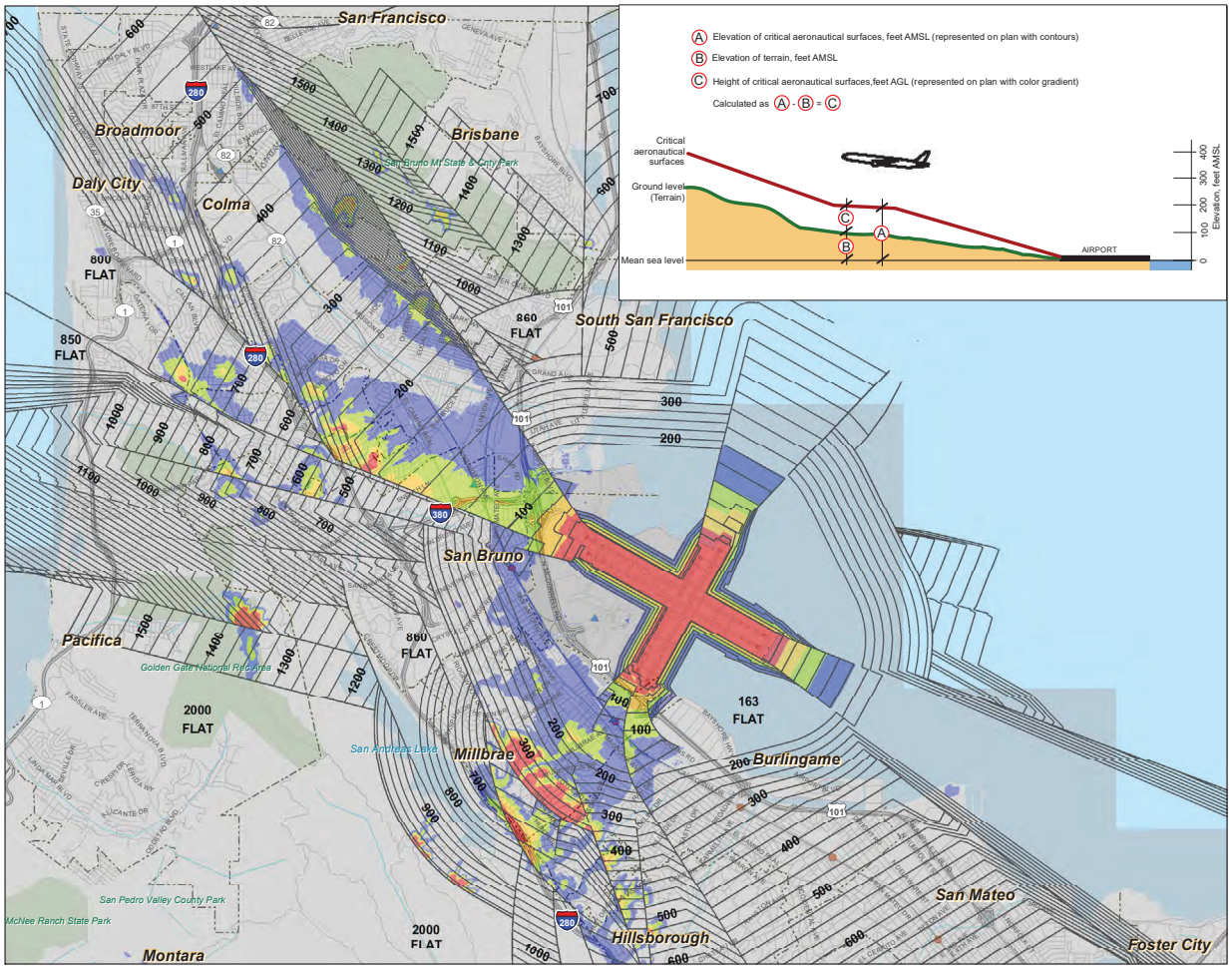
Part 77, Subpart C, establishes obstruction standards for the airspace around airports including approach zones, conical zones, transitional zones, and horizontal zones known as "imaginary surfaces." **Exhibit IV-13** depicts the Part 77 Civil Airport Imaginary Surfaces at SFO. The imaginary surfaces rise from the primary surface, which is at ground level immediately around the runways. The surfaces rise gradually along the approach slopes associated with each runway end and somewhat more steeply off the sides of the runways. The FAA considers any objects penetrating these surfaces, whether buildings, trees or vehicles travelling on roads and railroads, as obstructions to air navigation. Obstructions may occur without compromising safe air navigation, but they must be marked, lighted, and noted on aeronautical publications to ensure that pilots can see and avoid them.

Close-up views of the north and south sides of the Part 77 surfaces are provided in **Exhibit IV-14** and **Exhibit IV-15**, respectively. Additionally, **Exhibit IV-16** provides an illustration of the outer approach and transitional surfaces located on the southeast side of the Part 77 surfaces.

Together with its tenant airlines, SFO has undertaken a mapping effort to illustrate the critical aeronautical surfaces that protect the airspace required for multiple types of flight procedures such as those typically factored into FAA aeronautical studies, as shown on **Exhibit IV-17** and **Exhibit IV-18**. These aeronautical surfaces include those established in accordance with FAA Order 8260.3B, *U.S. Standard for Terminal Instrument Procedures (TERPS)*, and a surface representing the airspace required for One-Engine Inoperative (OEI) departures from Runway 28L (to the west through the San Bruno Gap).[16] The exhibits depict the lowest elevations from the combination of the OEI procedure surface and all TERPS surfaces. The surfaces are defined with Required Obstacle Clearance (ROC) criteria to ensure safe separation of aircraft using the procedures from the underlying obstacles. Any proposed structures penetrating these surfaces are likely to receive Determinations of Hazard (DOH) from the FAA through the 7460-1 aeronautical study process. These surfaces indicate the maximum height at which structures can be considered compatible with Airport operations.

[16] See Appendix F, Section F.3.2 for a discussion of one-engine inoperative procedures.

Docusign Envelope ID: 4913439B-9CF1-4352-91F5-E2FADDF96C1A



LEGEND

A — 100 — Elevation of critical aeronautical surfaces, feet Above Mean Sea Level (AMSL), North American Vertical Datum of 1988 (NAVD88)

C **Height of Critical Aeronautical Surfaces, Feet Above Ground Level (AGL)**

- 35 and lower
- 35- 65
- 65 - 100
- 100 - 150
- 150 and more
- Airport Property
- BART Station
- CALTRAIN Station
- Regional Park or Recreation Area
- Municipal Boundary
- Railroad
- Freeway
- Road

Notes:

1. This map is intended for informational and conceptual planning purposes, generally representing the aeronautical surfaces considered most critical by San Francisco International Airport (SFO) and its constituent airlines. It does not represent actual survey data, nor should it be used as the sole source of information regarding compatibility with airspace clearance requirements in the development of data for an FAA Form 7460-1, Notice of Proposed Construction or Alteration. SFO does not certify its accuracy, information, or title to the properties contained in this plan. SFO does make any warrants of any kind, express or implied, in fact or by law, with respect to boundaries, easements, restrictions, claims, overlaps, or other encumbrances affecting such properties.

2. This map does not replace the FAA's obstruction evaluation / airport airspace analysis (OE/AAA) review process. Proposing construction at elevations and heights that are lower than the critical aeronautical surfaces shown on this map, (a) does not relieve the construction sponsor of the obligation to file an FAA Form 7460-1, and (b) does not ensure that the proposal will be acceptable to the FAA, SFO, air carriers, or other agencies or stakeholders. SFO, San Mateo County, and local authorities having jurisdiction reserve the right to re-assess, review, and seek modifications to projects that may be consistent with this critical aeronautical surfaces map but that through the FAA OE/AAA process are found to have unexpected impacts to the safety or efficiency of operations at SFO.

Sources: San Francisco International Airport, Jacobs Consultancy, and Planning Technology Inc., 2009

NORTH

0 0.25 0.5 1 Miles

Exhibit IV-17

CRITICAL AERONAUTICAL SURFACES -- NORTHWEST SIDE

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

C/CAG

City/County Association of Governments of San Mateo County, California

Docusign Envelope ID: 4913439B-9CF1-4352-91F5-E2FADDF96C1A

Exhibit IV-19, which is provided for information purposes only, depicts a profile view of the lowest critical airspace surfaces along the extended centerline of Runway 10L-28R – the TERPS Obstacle Departure Procedure (ODP) surface, representing standard all-engines departures, and the approximate OEI surface developed by SFO through independent study in consultation with the airlines serving SFO. The exhibit also shows the terrain elevation beneath the airspace surfaces and various aircraft approach and departure profiles, based on varying operating assumptions. The exhibit illustrates a fundamental principle related to the design of airspace protection surfaces. The surfaces are always designed below the actual aircraft flight profile which they are designed to protect, thus providing a margin of safety. Note that the ODP climb profile is above the ODP airspace surface, and the OEI climb profile is above the OEI airspace surface.

4.5.4 AIRSPACE PROTECTION POLICIES

The following airspace protection policies (AP) shall apply to the ALUCP.

AP-1 COMPLIANCE WITH 14 CFR PART 77, SUBPART B, NOTICE OF PROPOSED CONSTRUCTION OR ALTERATION

AP-1.1 Local Government Responsibility to Notify Project Sponsors

Local governments should notify sponsors of proposed projects at the earliest opportunity to file Form 7460-1, *Notice of Proposed Construction or Alteration*, with the FAA for any proposed project that would exceed the FAA notification heights, as shown approximately on Exhibit IV-10. Under Federal law, it is the responsibility of the project sponsor to comply with all notification and other requirements described in 14 CFR Part 77. This requirement applies independent of this ALUCP.

AP-1.2 FAA Aeronautical Study Findings Required Before Processing Development Application

The sponsor of a proposed project that would exceed the FAA notification heights, as shown approximately on Exhibit IV-10, shall present to the local government permitting agency with his or her application for a development permit, a copy of the findings of the FAA's aeronautical study, or evidence demonstrating that he or she is exempt from having to file an FAA Form 7460-1. It is the responsibility of the local agency to consider the FAA determination study findings as part of its review and decision on the proposed project.

AP-2 COMPLIANCE WITH FINDINGS OF FAA AERONAUTICAL STUDIES

Project sponsors shall be required to comply with the findings of FAA aeronautical studies with respect to any recommended alterations in the building design and height and any recommended marking and lighting of their structures for their proposed projects to be deemed consistent with this ALUCP.

Docusign Envelope ID: 4913439B-9CF1-4352-91F5-E2FADDF96C1A

AP-3 MAXIMUM COMPATIBLE BUILDING HEIGHT

In order to be deemed consistent with the ALUCP, the maximum height of a new building must be the lower of (1) the height shown on the SFO critical aeronautical surfaces map (Exhibits IV-17 and IV-18), or (2) the maximum height determined not to be a "hazard to air navigation" by the FAA in an aeronautical study prepared pursuant to the filing of Form 7460-1.

For the vast majority of parcels, the height limits established in local zoning ordinances are lower than the critical airspace surfaces. In those cases, the zoning district height regulations will control. Compliance with the zoning district height and the SFO critical aeronautical surfaces map, however, does not relieve the construction sponsor of the obligation to file a FAA Form 7460-1 *Notice of Proposed Construction or Alteration*, if required, and to comply with the determinations resulting from the FAA's aeronautical study.

For a project to be consistent with this ALUCP, no local agency development permits shall be issued for any proposed structure that would penetrate the aeronautical surfaces shown on Exhibits IV-17 and IV-18 or the construction of which **has not** received a Determination of No Hazard from the FAA, or which would cause the FAA to increase the minimum visibility requirements for any instrument approach or departure procedure at the Airport.

AP-4 OTHER FLIGHT HAZARDS ARE INCOMPATIBLE

Proposed land uses with characteristics that may cause visual, electronic, or wildlife hazards, particularly bird strike hazards, to aircraft taking off or landing at the Airport or in flight are incompatible in Area B of the Airport Influence Area. They may be permitted only if the uses are consistent with FAA rules and regulations. Proof of consistency with FAA rules and regulations and with any performance standards cited below must be provided to the Airport Land Use Commission (C/CAG Board) by the sponsor of the proposed land use action.

Specific characteristics that may create hazards to aircraft in flight and which are incompatible include:

(a) Sources of glare, such as highly reflective buildings or building features, or bright lights, including search lights or laser displays, which would interfere with the vision of pilots making approaches to the Airport.

(b) Distracting lights that that could be mistaken by pilots on approach to the Airport for airport identification lighting, runway edge lighting, runway end identification lighting, or runway approach lighting.

(c) Sources of dust, smoke, or water vapor that may impair the vision of pilots making approaches to the Airport.

(d) Sources of electrical interference with aircraft or air traffic control communications or navigation equipment, including radar.

(e) Land uses that, as a regular byproduct of their operations, produce thermal plumes with the potential to rise high enough and at sufficient velocities to interfere with the control of aircraft in

Docusign Envelope ID: 4913439B-9CF1-4352-91F5-E2FADDF96C1A

flight. Upward velocities of 4.3 meters (14.1 feet) per second at altitudes above 200 feet above the ground shall be considered as potentially interfering with the control of aircraft in flight.[17]

(f) Any use that creates an increased attraction for wildlife, particularly large flocks of birds, that is inconsistent with FAA rules and regulations, including, but not limited to, FAA Order 5200.5A, *Waste Disposal Sites On or Near Airports*, FAA Advisory Circular 150/5200-33B, *Hazardous Wildlife Attractants On or Near Airports*, and any successor or replacement orders or advisory circulars. Exceptions to this policy are acceptable for wetlands or other environmental mitigation projects required by ordinance, statute, court order, or Record of Decision issued by a federal agency under the National Environmental Policy Act.

4.5.5 iALP AIRSPACE TOOL

In consultation with C/CAG, SFO developed the iALP Airspace Tool, a web-based, interactive tool to evaluate the relationship of proposed buildings with the Airport's critical airspace surfaces. The iALP Airspace Tool is designed to assist planners, developers, and other interested persons with the implementation of the airspace protection policies of the SFO ALUCP. The tool helps users determine: (1) the maximum allowable building height at a given site, and/or (2) whether a building penetrates a critical airspace surface, and by how much, given the proposed building height.

A more detailed description of the iALP Airspace Tool and a tutorial explaining how to use it is presented in **Appendix J**. Use of this tool, however, does not relieve a project sponsor of the duty to comply with all federal regulations, including the obligation to file Form 7460-1, Notice of Proposed Construction or Alteration, with the FAA.

[17] This is a threshold established by the California Energy Commission in its review of power plant licensing applications. See *Blythe Solar Power Project: Supplemental Staff Assessment, Part 2*,. CEC-700-2010-004-REV1-SUP-PT2, July 2010. California Energy Commission. Docket Number 09-AFC-6, p. 25. This criterion is based on guidance established by the Australian Government Civil Aviation Authority (Advisory Circular AC 139-05(0), June 2004). The FAA's Airport Obstructions Standards Committee (AOSC) is studying this matter but has not yet issued specific guidance.

Gmail Lisa Costa-Sanders <lcostasanders@goodcityco.com>

SamTrans Comments on Draft EIR for Tanforan Development Project

Bo Baney <BaneyB@samtrans.com> Mon, Aug 11, 2025 at 2:59 PM
To: "tanforan@sanbruno.ca.gov" <tanforan@sanbruno.ca.gov>
Cc: Greta Dooley <dooleyG@samtrans.com>

Hi Peter,

We have reviewed the relevant sections of the draft EIR and have one comment regarding current SamTrans service along El Camino Real (3.14-11).

In the Environmental Setting section under the Transit heading you state:

> Additionally, the average load on SamTrans Route ECR near the project site is 20 passengers per bus, compared to a maximum bus capacity of approximately 120 passengers.

The second half of this statement is incorrect. The articulated buses (largest capacity in our fleet) that service this route have a capacity between 52-78 passengers (52 seated; 78 seated and standing combined). In addition, by correcting this max capacity number the "additional capacity of approximately 400 passengers per hour" should be adjusted downward.

Please let me know if you have any questions or need further clarification. Additionally, please note that I am the contact person for SamTrans for any further inquiries.

Sincerely,

Bo Baney (he/him)
Manager, Environmental & Sustainability Planning
SamTrans | Caltrain | TA
Office: (650) 508-7792

San Mateo County
TRANSIT DISTRICT
Caltrain samTrans TA

Feedback on the Tanforan Redevelopment Project Draft Environmental Impact Report:

The draft EIR for the proposed Tanforan redevelopment project fails to adequately identify, assess, and plan for a significant existing sustainable transportation corridor: the Centennial Way Trail. This trail terminates at the intersection of Huntington Avenue, South Maple Avenue, and Sneath Lane (directly adjacent to the project site) and serves as the southern terminus of a 2.85-mile Class I, fully separated bikeway that connects San Bruno to South San Francisco and Colma.

This is the only Class I bikeway in the vicinity of the project and provides this site with the only safe, vehicle-separated access to recreational amenities, cultural amenities, groceries/retail, learning institutions, and other services. The presence of this bikeway, which already sees significant usage, is not recognized in this plan nor are the connections that it offers.

This is one of the few bicycle routes of its type in the county and the EIR should explicitly plan for and identify the impact that this project will have as the new southern node of the corridor. The EIR must address how the project will connect safely and directly to the Centennial Way without requiring unsafe crossings or circuitous routes. These connections should be designed to be fully accessible and inviting for pedestrians, cyclists, and people using mobility devices. Furthermore, residential building 3 sits immediately adjacent to the pathway without having to cross any roads. Additional details should be provided for how this building will integrate with its adjacent infrastructure.

Presently, this EIR includes minimal information about the types of bicycle infrastructure that will be included in the plan, insufficient details to effectively assess the project's impact on the bicycle network. Bicycle connectivity is identified as a goal in this project as well as a goal within the San Bruno Walk 'N Bike Plan, San Bruno Local Roadway Safety Plan, and San Mateo County Comprehensive Bicycle and Pedestrian Plan 2021, among others.

This EIR does reference external plans for Class IV infrastructure on Sneath Ln and Huntington Ave but fails to identify any bicycle infrastructure within the project beyond describing internal streets as "low-stress" for bicycles. "Low-stress" without any description of bicycle/roadway infrastructure is insufficient to assess the bicycle connectivity and thus compliance with the bicycle goals for this plan. Class III versus Class IV infrastructure for example offer completely different levels of comfort, safety, and accessibility for bikes. These details must be included in the EIR. If any subsection of a bicycle trip is not safe, then the entire trip can be made inaccessible. It is also insufficient to claim that bicycle infrastructure just on the periphery of this project is enough to offer a safe bicycle route to visitors/residents/employers of the project's internal buildings.

In addition to the feedback provided above, please explicitly respond/address the following:

1. Note the presence of the Centennial Way Trail as a regional transportation corridor and the project's implications given its location at its southern terminus.

    a. Identify the amenities and services that are offered along the corridor, as well as how this project's amenities may compliment these.
2. Identify how the project will provide seamless and safe pedestrian and bicycle connection to the Centennial Way and its impact. Include (a) the main section of the project and (b) residential building 3
    a. Identify and ensure compliance with bike connections according to both the San Bruno Walk 'n Bike Plan and the South San Francisco Active South City Plan (which governs the Centennial Way Trail).
3. For internal project roads, identify the class of bicycle infrastructure that will be constructed along each roadway
    a. Asses compliance with local and regional bicycle goals
    b. Justify class of bicycle infrastructure with external guidelines (NACTO Urban Bikeway Design Guide, San Bruno Walk 'n Bike Plan) taking into account motor vehicle volume, speed, and turning conflicts.
    c. Identify infrastructure offered at intersections with the external bike network (all intersections with Sneath, Huntington, and El Camino Real).
    d. Remedy discrepancies among maps showing bicycle and pedestrian infrastructure (Figures 2-10 and 2-13)
4. When evaluating bicycle and pedestrian circulation in the vicinity of the site, also identify and incorporate (a) the infrastructure that is being constructed with the adjacent Southline Project and (b) other active transportation changes planned in the 2022 Active South City Plan.
5. To comply with local and regional goals for transit oriented development, identify corridors and circulation for (a) pedestrians (b) bicycles and (c) motor vehicles for connecting between the project and adjacent BART station. As indicated in Figure 2 -13, bicycle circulation between the project and BART station requires travelling on a highly-indirect route north of Residential Building 2 or south of Flex Zone 2. (d) Consider the alternative of a direct connection to the west side of the BART station being included in the bicycle circulation plan.

This project site represents an excellent opportunity to build homes, offices, and retail that can be accessed by public transit and active transportation. This EIR draft however fails to identify and review the complete transportation network in the vicinity of the project and how the development will connect to that infrastructure. These steps must be completed to be in compliance with several regional and local goals identified earlier in this letter. These substantial transportation deltas in the EIR also throw into question the accuracy of VMT calculations that were done in the draft.

Thank you,

Nicholas Wilsey

Gmail

Lisa Costa-Sanders <lcostasanders@goodcityco.com>

Feedback

Tim Gretter and Julia Gretter Fernandez <tj8.21.2013@gmail.com> Mon, Jul 28, 2025 at 7:00 PM
To: tanforan@sanbruno.ca.gov

Dear Tanforan Development Team,

As a homeowner on Atlantic Avenue, I am concerned for my families impact from the construction air quality.

I would like to see each home in our neighborhood to be able to request a HEPA air purifier.

I would also like to request no construction after hours of 5pm as a young family construction noise is going to be challenging to have children sleep through the night.

We are interested in noise reducing window upgrades.

Thank you for your time and consideration,

Gretter Family

Tanforan Redevelopment Project

Draft EIR Community Meeting Comment Form

The City of San Bruno is accepting comments on the Draft Environmental Impact Report for the Tanforan Redevelopment Project until **5:00 p.m. on August 11, 2025.** Please note that this form is optional, and you are not required to state your name in order to speak. Should this form be completed and submitted to staff, it will become public record, subject to disclosure under the State's Public Records Act. Note that your entire comment, including any personal information provided, will become part of the Final EIR and will be publicly available. ***Please write your email legibly to be notified of publication of the Final EIR, which will address your comment.***

Comments can also be submitted via mail or email to the following:

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

georgereade16@yahoo.com

Name: George Reade

Title and Organization (if applicable):

Email: Georgereade66@Yahoo.com B.Reade81@Gmail.com

Date: 7-29-25

☐ **I'd like to make a verbal comment.** To make a verbal comment, fill in the information above, turn the sheet in to staff, and provide your verbal comment when called on.

☑ **I'd like to make a written comment.** To make a written comment, please write your comment below and return to staff tonight or submit a public comment by 5:00 pm on August 11th following the instructions above.

WRITTEN COMMENT *(use back side if you need additional space or attach additional sheets)*

I live across street from Bart
Have had am Instaled in Air purifiers
and windows for Noise and Air poulution.

Tanforan Redevelopment Project

Draft EIR Community Meeting Comment Form

The City of San Bruno is accepting comments on the Draft Environmental Impact Report for the Tanforan Redevelopment Project until **5:00 p.m. on August 11, 2025.** Please note that this form is optional, and you are not required to state your name in order to speak. Should this form be completed and submitted to staff, it will become public record, subject to disclosure under the State's Public Records Act. Note that your entire comment, including any personal information provided, will become part of the Final EIR and will be publicly available. ***Please write your email legibly to be notified of publication of the Final EIR, which will address your comment.***

Comments can also be submitted via mail or email to the following:

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

Name: Shirley Reed

Title and Organization (if applicable):

Email: Shirleyreed777

Date: 7/29/25

☐ **I'd like to make a verbal comment.** To make a verbal comment, fill in the information above, turn the sheet in to staff, and provide your verbal comment when called on.

☐ **I'd like to make a written comment.** To make a written comment, please write your comment below and return to staff tonight or submit a public comment by 5:00 pm on August 11th following the instructions above.

WRITTEN COMMENT *(use back side if you need additional space or attach additional sheets)*

I highly object to so little parking units per household (1 car per unit) All of these extra people & cars are going to cause lots of impact to our community. This is unacceptable and needs further study. Most household have at least 2 cars. 8 stories high is too much too high

PUBLIC COMMENT HEARING TRANSCRIPTION
DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE
TANFORAN REDEVELOPMENT PROJECT
July 29, 2025

Commenter 1: Isan (35:05 – 38:02)

Hello, my name is Isan. I wanted to thank you, presenters, for your EIR report. I am a long-time San Bruno resident, and my family still has property in the fifth addition. Mostly their home was affected by Southline. They were within I believe that 500-feet distance, and the air particulates, I noticed, actually, floating around still in that area. There is a study that's being done with South City Rise and UC Davis, where there's some TARTA[1] air pollution monitors that are being placed in homeowners—on their properties, where it's measuring the air pollutants, and I would like to hope that that is being addressed for all of the locals who are being affected by this.

For the Flex Zone that's recommended and the hotel or potential additional housing, I've heard in city council meetings where the recommendation is that the zoning might change and potentially eight floors would be built. That's with, I guess, the greenlight from the environmental studies, if that's okay with the noise pollution that's coming from SFO. Me personally, I would not want to see eight-level hotels. I would not want to see eight-level apartments. I think six is okay, with respect to what we have that's the highest level. Maybe that would be the top of BART or Walmart headquarters would possibly be the tallest building that we have.

I would like to ask for some monetary funds for all of the homes that are within the parameters that are most effected on El Camino and Huntington Avenue. This is a request that I would've made on the behalf of all the tenants that my family has that are closer to Tanforan Avenue. But I do have family that are affected that live on Huntington Avenue, and I would like to see them compensated for the inconvenience that they're going to be suffering with the noise pollution as well as the air pollution. They have little children that live in those households, and I would like to see all of the neighborhoods compensated for that inconvenience that they're going to have. I'm just going to throw out a dollar amount: $25,000 for each house; this is open to discussion.

And I would also like the Tanforan developers to consider donating $4 million to the San Bruno community foundation fund that was closed. That could be opened in a more traditional sense, and it would be community organizers that could request and apply for grants from that fund since it was closed this year.

Thank you for your consideration.

Commenter 2: Matt (39:50 – 44:39)

So thanks everyone for being here tonight. So my name's Matt. I'm a former employee for the City, and I'm a resident in District 3. So I have a couple questions. I do have a little bit of background

[1] Toxic-metal Aerosol Real Time Analyzer

doing planning myself, and some environmental reviews, so these are just kind of some clarifying questions I had for staff.

So I was glad to see that there is a comment about mitigation of biological resources for nesting birds. And just for context, four residents went out to canvas the fifth addition neighborhood this past weekend. We asked residents about some of their experiences with redevelopment of Tanforan during the last iteration of BART, and then also their experience with the Southline project. And so I'm just kind of summarizing a little bit of what I heard in an anonymous way. But one thing that came up for people was nesting birds, and they noted that the last time that that site had extensive redevelopment that there were a bunch of birds that were landing into their yards. So I'm glad that there's going to be—I'm asking if there's going to be perhaps like a biological study, and folks that are going to be looking into that, hopefully.

Other comment was about greenhouse gas emissions and transportation, about the trip generation analysis, and how are you modeling some of the trip generation that are going to be placed at different types of trips. And I say that because some folks had said to me in the past that Target tends to get more people that drive rather than take transit, for example. And I also heard from our own engineers in the city that one of the reasons why they chose to not take away a lane of traffic for the cycle track that was installed was because they anticipated there was going to be more vehicle traffic because of the Southline project and eventually for Tanforan. So I just wanted to check in to kind of see, you know, are we going to strategies that are going to be utilized so that we can, you know, make the numbers work, I guess.

Next question was about water supply. When I canvassed the neighborhood, residents had concerns and questions about whether the water supply would be sufficient. Folks had mentioned that we do have a city that relies on I think about 50 percent of our water is groundwater. So just making sure that we have it for all the new development there.

Another question on cultural resources was about whether we'd be able to engage some of the same folks who were on the committee to develop that heritage site around the BART station. We could engage the Japanese-American committee as part of the cultural monitoring in case there's any cultural resources that are uncovered as part of the construction.

For toxic air—Oh, sorry, before I get to that. Question about a wind study to make sure that there's extensive wind studies that are taken into effect. With the number of residents who made comments that they felt like a lot of the wind patterns were pushing the air from both Tanforan and Southline at different parts of the day, and so they were concerned about, for example, the Southline project that there was a lot of debris that was coming off the site that wasn't getting taken care of. So that was an area of concern for them. So whether it's—hopefully that that could form some of the practices if those were not already taken out. One thing that we heard in particular was that during the painting of BART station that there was a bunch of paint that was flying onto the residents, and they had to get their cars and windows redone by the developer because of that.

And then the last thing I guess I wanted to bring up was for toxic air containments, I'm hoping that one of the alternatives for the project would consider a use that did not include operational toxic air—I guess it's the life science. But I'm just—to me that seems like it's a really significant impact because it's not just during construction phase but operational, and over the lifespan of 30 years seems like it would have really negative effects on the residents there. So if there's an opportunity to—once we get an alternative that could still be viable to the developer, I think probably a lot of community members would want to see that. And that was it for my comments, and I encourage other people to make public comment if you'd like to.

Commenter 3: George (44:50 – 46:01)

Hi, so my name is George. I actually live across the street from BART. So they're been doing some work there, and the noise—they were pretty good about it. There was some noise when they were doing the BART—the actual transit station, I think, that was at night and it was overwhelming. Like it shakes the ground and it was—I had no idea what it was. I was like—it sounded like someone was cutting wood inside my house, like they're cutting the house.

But yeah, so anything they can do to mitigate noise. I don't feel like a sound barrier is really going to help much. I mean how high is it going to be, like 10 feet high or something like that? I feel like it would go over it.

So the flyer they sent out mentioned air filters inside the house and possibly windows, which I'm interested in. Some of the houses have them from the airport, but I didn't respond, however, so I don't. But yeah, anything that could help with that would be great.

But obviously, some—oh, and the flex zones that they talk about are kind of scary. Switching the life zones are kind of—the life science seems like it's a good addition to the neighborhood, but if you switch it all to apartments it's like a big 180. So that's kind of scary. This thing—totally different.

But that's all I got to say. Thank you.

Gmail

Lisa Costa-Sanders <lcostasanders@goodcityco.com>

Carpenters Local 217 comment letter re Tanforan Redevelopment Project Draft EIR

Harvey McKeon <hmckeon@nccrc.org> Mon, Aug 11, 2025 at 3:00 PM
To: "PGilli@sanbruno.ca.gov" <PGilli@sanbruno.ca.gov>, "Tanforan@sanbruno.ca.gov" <Tanforan@sanbruno.ca.gov>
Cc: "CityClerk@sanbruno.ca.gov" <cityclerk@sanbruno.ca.gov>, Edward Evans <eevans@nccrc.org>, "Douglas M. Chesshire" <dchesshire@nccrc.org>, Dan Calamuci <DCalamuci@nccrc.org>

Dear Mr. Peter Gilli,

The members and officers of Carpenters Local Union 217 appreciate the opportunity to offer comment regarding the Draft Environmental Impact Report for the Tanforan Redevelopment Project.

Local 217 advocates that the City should mandate that construction activity related to this development be conditional upon compliance with local hire and responsible contractor requirements as a means of simultaneously reducing environmental impacts and augmenting the proposed project's economic benefits for the community.

Local 217 remains at the City's disposal as a partner and stakeholder in the development of such policy. Please see further details in the attached later.

Yours sincerely,

Harvey McKeon
Field Representative, Strategic Campaigns & Research
Nor Cal Carpenters Union

(510) 414-5371
hmckeon@nccrc.org
https://norcalcarpenters.org

Carpenters Local 217 comment letter re Tanforan Redevelopment Project Draft EIR.pdf
195K

SILICON VALLEY BICYCLE COALITION

bikesiliconvalley.org
95 S. Market Street, Suite 648
San Jose, CA 95112
408-287-7259

Aug 11, 2025

City of San Bruno

RE: Tanforan EIR

Dear San Bruno Tanforan Project Managers and Consultants,

Thank you for the opportunity to comment on the Tanforan Environmental Impact Report. The Bike Coalition typically provides comments and letters of support for grant applications but occasionally we weigh in on projects that have regional or strategic significance. Tanforan is such a project because of its proximity to transit stations and potential for smart, transit-oriented, mixed-use development.

SVBC's policy agenda outlines our positions on transportation and land use decisions. We are in favor of building housing in areas that reduce or eliminate the need for new residents to drive and support the inclusion of residential on this site. We note that the developer proposes just over 1,000 units but the EIR allows up to ~1,500 units; we encourage the maximum feasible amount onsite with as great of a level of affordability as is possible. Placing affordable housing adjacent to Samtrans and BART, and coupling this development with incentives to use transit, walk, and bike, could greatly reduce emissions and pollution onsite and with adjacent residents. SVBC highly encourages City staff and developer to provide incentives that have proven to reduce car trips for the future residents and workers onsite by developing a robust sitewide Transportation Demand Management (TDM) program with metrics for tracking and enforcement. Recent examples include the Clipper BayPass pilot program, which has shown tremendous success in increasing transit ridership.

SVBC staff have participated in many transportation-related conversations with staff at every jurisdictional level; SVBC staff believe that San Bruno is well-positioned to make major improvements for connectivity through this project. For example, Caltrans is working with the City of South San Francisco to pursue bike lanes on El Camino Real as part of their SHOPP project. These lanes, however, will end at Sneath Lane. With a public right of way of well over 100 feet for the El Camino Real strip between Sneath and I-380, San Bruno could redesign this segment to include better connections for bicyclists, transit riders and pedestrians by reallocating more space, reducing vehicle traffic and better connecting the project site to the rest of the community, including the senior housing at the former Navy Site. Furthermore, staff have collaborated with SMCTA and Samtrans staff on resurrecting the Grand Boulevard Initiative. San Bruno has a chance through this project to promote greater connectivity and partnership with these regional agencies by investing in more frequent stops for their buses, enhancing bus stops with creation of express/bus-only lanes or shelter improvements, and/or exploring new options like a shuttle program that could better connect residents to downtown and the Caltrain station.

Thank you for your consideration.

Sincerely,

Matt Jones

Advocacy Director, SVBC

BOARD OF DIRECTORS
Gary Brustin
Kay Cheng
Jennifer Fierman
Poncho Guevara
Andrew Hsu
Lien Hua Johnson
James Lucas
Josh Mello
Jim Parker
Christina Salvatier
Ed Morimoto
Hong Quan

Clarrissa Cabansagan
Executive Director

SVBC is a 501(c)(3) non-profit organization

Building healthier and more just communities by making bicycling safe and accessible for everyone

Subject: Public Comment on the Environmental Impact Report for the Tanforan Redevelopment Project

Dear City of San Bruno and ICF Consulting,

On behalf of Climate Resilient Communities, we are writing to submit this comment on the Environmental Impact Report (EIR) for the proposed redevelopment of the Tanforan Mall site. Our organization works closely with frontline communities in San Bruno, including the Tanforan neighborhood, to build climate resilience through inclusive, community-driven planning, adaptation, and implementation strategies.

We appreciate the City's efforts to revitalize the Tanforan site and recognize the potential for this project to bring new opportunities to San Bruno residents, in particular, we appreciate the opportunities this redevelopment effort offers to provide new infill housing–something vital to addressing our state's environmental justice and housing justice crises. However, we are concerned about the potential increase in local air pollution—particularly during demolition, construction, and eventual operation phases—and the associated health risks to residents living nearby, including seniors, young children, and people with pre-existing health conditions. The City of San Bruno already faces an elevated exposure to chronic air pollution due to local highways and the airport. The census tract immediately adjacent to the development has a pollution burden above the 75th percentile for all census tracts in California and receives more exposure to diesel particulate matter than 84% of census tracts in the state (CalEnviroScreen 4.0, tract #6081604101).

According to the City of San Bruno's announcement, the "EIR determined the Project would have potentially significant impacts related to: Air Quality; Biological Resources; Cultural Resources; Energy; Paleontological Resources; Hazards and Hazardous Materials; Hydrology and Water Quality; Land Use; Noise; Transportation; and Utilities. ***All impacts, with the exception of Air Quality and Noise, would be reduced to less-than-significant levels through implementation of identified mitigation measures."***

To mitigate these risks, CRC strongly urges the City and project developers to incorporate a **community health protection mitigation measure** into the EIR: specifically, to **donate and distribute portable HEPA air purifiers, indoor air quality monitors, N95 masks, and air quality education concerning construction to all households within the impacted area**, and outdoor TARTA or PurpleAir monitors for the wider community. These tools would provide residents with practical protection against particulate matter and other pollutants, especially during high pollution days or wildfire smoke events, which are becoming increasingly common.

This measure would:

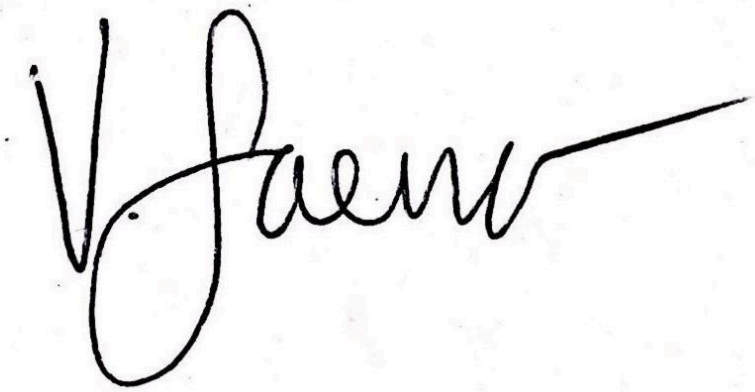
- Provide immediate health benefits to vulnerable households;
- Increase community awareness and preparedness around air quality hazards;

- Align with regional and state-level climate adaptation goals;
- Be a tangible investment in environmental justice for communities most affected by cumulative pollution burdens;
- Not impose an undue burden on the redevelopment effort.

We recommend that this mitigation action be included in the final EIR and reflected in the project's **community benefits agreement.** Climate Resilient Communities would be happy to collaborate on identifying the most impacted residents and helping facilitate a culturally and linguistically appropriate distribution process.

Thank you for your consideration of this important health-protective measure. We look forward to continuing to engage with the City and project stakeholders to ensure that redevelopment efforts contribute to a healthier, more equitable San Bruno.

Sincerely,
Violet Wulf-Saena
Executive Director
Climate Resilient Communities



Subject: Public Comment on the Environmental Impact Report for the Tanforan Redevelopment Project

Dear City of San Bruno and ICF Consulting,

On behalf of Resilient San Bruno (RSB), we are writing to submit this comment on the Environmental Impact Report (EIR) for the proposed redevelopment of the Tanforan Mall site. Our community team, focused on working towards collective action on environmental concerns, works closely with our neighbors in frontline communities in San Bruno, including the Tanforan neighborhood and the Belle Air neighborhood.

We appreciate the City's efforts to revitalize the Tanforan site and recognize the potential for this project to bring new opportunities to San Bruno residents. However, we are concerned about the potential increase in local air pollution—particularly during demolition, construction, and eventual operation phases—and the associated health risks to residents living nearby, including seniors, young children, and people with pre-existing health conditions. In your draft EIR report, you cited the potential for the exposure of residents to potentially hazardous PM 2.5 for the next 30 years.

According to the City of San Bruno's announcement, the "EIR determined the Project would have potentially significant impacts related to: Air Quality; Biological Resources; Cultural Resources; Energy; Paleontological Resources; Hazards and Hazardous Materials; Hydrology and Water Quality; Land Use; Noise; Transportation; and Utilities. ***All impacts, with the exception of Air Quality and Noise, would be reduced to less-than-significant levels through implementation of identified mitigation measures."***

RSB recognizes that even with mitigations in place, impacts would be significant on all who use the project site - workers, residents, and patrons of businesses - and potentially for adjacent communities like those in the 5th Addition neighborhood.

The DEIR states that "The causes of the cancer risk threshold exceedance for onsite receptors are from future residential receptors being exposed to DPM during construction at the site and then to TACs for nearly 30 years during operations, specifically DPM from generator testing and truck traffic and laboratory-related TACs from onsite laboratory uses.**"** (ES-4)

RSB has concerns about the project's impact on the 5th Addition neighborhood, which was not addressed by the above statement. Additionally, the Alternative scenarios did not consider changing the life science use proposed onsite to a less environmentally-toxic use without any reductions in housing units constructed. **We request that the consultant draft a project alternative that maintains the number of housing units and proposes a less polluting industrial/commercial usage in response to these findings.**

To mitigate these risks, RSB strongly urges the City and project developers to incorporate a **community health protection mitigation measure** into the EIR: specifically, to **donate and distribute portable HEPA air purifiers, indoor air quality monitors, N95 masks, and air**

quality education concerning construction to all households within the impacted area, and outdoor TARTA or PurpleAir monitors for the wider community. These tools would provide residents with practical protection against particulate matter and other pollutants, especially during high pollution days or wildfire smoke events, which are becoming increasingly common.

This measure would:

- Provide immediate health benefits to vulnerable households;
- Increase community awareness and preparedness around air quality hazards;
- Align with regional and state-level climate adaptation goals;
- Be a tangible investment in environmental justice for communities most affected by cumulative pollution burdens;
- And would not impose a significant burden on the redevelopment process..

We recommend that this mitigation action be included in the final EIR and reflected in the project's **community benefits agreement.** Resilient San Bruno would be happy to collaborate on identifying the most impacted residents and helping facilitate a culturally and linguistically appropriate distribution process.

Thank you for your consideration of this important health-protective measure. We look forward to continuing to engage with the City and project stakeholders to ensure that redevelopment efforts contribute to a healthier, more equitable San Bruno.

Sincerely,

Nicole Hanhan

RSB Chairperson.

Responses to Comment Letter 1 (Federal Aviation Administration)

Response to Comment 1-1

The comment summarizes the main features of the project and states the commenter's agency mission to provide for the safety and efficiency of the aerospace system.

The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 1-2

The commenter states that the application of Form 7460-1 applies to buildings as well as construction equipment.

Revisions were made to Mitigation Measure HAZ-5 to clarify that Form 7460-1 is also required for construction equipment. Mitigation Measure HAZ-5 was also revised to require that the applicant request preliminary review by the FAA, as requested by the commenter. See also Master Response 2 (ALUCP Compatibility and Impacts) regarding past FAA approvals for temporary construction equipment that breach the obstruction surfaces outlined in 14 CFR Part 77.17 as well as critical airspace.

Response to Comment 1-3

The commenter states that most aircraft-related bird strikes occur on approach to Runways 28L and 28R and departure from Runways 10L and 10R, and that for SFO, the FAA recommends a 10,000-foot separation distance from the nearest aircraft movement areas for any hazardous wildlife attractants. The commenter also cites the sections of AC150/5200-33C that discuss landscaping, structures, and other hazardous wildlife attractants that are generally not compatible with safe airport operations within the 10,000-foot radius of an airport to protect approach, departure, and circling airspace. The commenter requests that Mitigation Measure HAZ-5 include measures that are consistent with the guidance provided in AC150/5200-33C, which include review of the landscaping plan by a Qualified Airport Wildlife Biologist and notification provided to SFO to review the landscape plan for attractiveness to hazardous wildlife.

Refer to Master Response 2 (ALUCP Compatibility and Impacts) for a discussion of the adequacy of the evaluation of aircraft bird strike hazards. As discussed therein, Mitigation Measure HAZ-5 has been revised in Chapter 3, *Revisions to the Draft EIR*, to include additional requirements for landscape evaluation at the project site by a qualified biologist.

Response to Comment 1-4

The commenter states the project would introduce a new incompatible residential land use into the 70 dBA CNEL noise contour and would increase noise incompatibility. See Master Response 2 (ALUCP Compatibility and Impacts). No revisions to the Draft EIR are required.

Response to Comment 1-5

The commenter asserts that in accordance with FAA Final Policy on Part 150 Approval of Noise Mitigation Measures: Effect on the Use of Federal Grants for Noise Mitigation Projects (63 Federal Register 16409), structures and new non-compatible development built after October 1, 1998, are not eligible for approval of remedial noise mitigation measures under Part 150 or Airport Improvement Program (AIP) funding. Therefore, the Tanforan Redevelopment Project would not be eligible to receive any Part 150 or AIP funding for residential sound insulation, inclusive of the mitigation.

The City acknowledges receipt of this information. The analysis in Draft EIR Section 3.10, *Noise*, does not assume that the project would require approval under Part 150 or AIP funding. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 1-6

The commenter states that it is not clear what party is responsible for implementing specific measures identified as part of Mitigation Measure NOI-3. The mitigation measure has been revised to make clear that while the City approves the Noise Reduction Plan, the project applicant is responsible for implementing the Noise Reduction Plan.

Response to Comment 1-7

The commenter provides a reminder to the City and County of San Francisco of their federal agreement obligations related to land uses, specifically Federal Grant Assurance 21, which mandates the Airport Sponsor, SFO, take action to restrict the use of land adjacent or in the immediate vicinity of the airport.

The comment is directed to the City and County of San Francisco and relates to grant assurances provided by SFO to the FAA. The comment does not assert that the City of San Bruno has any outstanding grant assurance obligations to the FAA. To the extent Federal Grant Assurance 21 requires SFO to take action to restrict land use around the airport, SFO does not have regulatory land use authority in the City of San Bruno; however, SFO provided comments on the EIR, which the City has responded to in this Final EIR (see Comment Letter 6).

Responses to Comment Letter 2 (Caltrans – District 4)

Response to Comment 2-1

The comment accurately summarizes the main features of the project.

The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 2-2

The comment acknowledges that the vehicle miles traveled (VMT) analysis is consistent with the Office of Land Use and Climate Innovation Technical Advisory. The comment next identifies that the

number of trips generated by the project would increase with implementation of the proposed project, thereby degrading level of service (LOS) compared to existing conditions.

While the per capita VMT is expected to go down with the project, the total number of people on-site is expected to increase, and the peak hour intensity (related to the employment land uses) is expected to increase, which would lead to degradation of LOS during peak hours. Note that, as described on page 3.9-25 of the Draft EIR, "the updated CEQA Guidelines that implement SB 743 established that vehicle delay, or level of service, can no longer be used as a criterion for identifying significant transportation impacts for most projects under CEQA." This is reflected in the Draft EIR on page 3.14-25 where it states that the LOS Memo found in Appendix 3.14-2 is for informational purposes only.

The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 2-3

The comment correctly summarizes how the travel demand methodology conservatively omits the effect of a Travel Demand Management (TDM) program. The comment also correctly notes that the site is required by the City/County Association of Governments of San Mateo County (C/CAG) to implement a TDM program designed to meet a 25 percent reduction in vehicle trips.

The Draft EIR recognizes that the C/CAG requires implementation of a TDM program for this project in, among other places, Section 2.6.12, *Transportation Demand Management*. The Draft EIR acknowledges the C/CAG requirements, including the 25 percent reduction goal on page 3.14-16. Regarding the commenter's statement that there may still be an increase in trips over existing conditions, the City acknowledges this. As described on page 3.9-25 of the Draft EIR, "the updated CEQA Guidelines that implement SB 743 established that vehicle delay, or level of service, can no longer be used as a criterion for identifying significant transportation impacts for most projects under CEQA." This is reflected on page 3.14-25 of the Draft EIR where it states that the LOS Memo found in Appendix 3.14-2 is for informational purposes only. No revisions to the Draft EIR are required.

Response to Comment 2-4

The comment provides a recommendation that the City of San Bruno consider TDM requirements and incentives for the project that would further reduce project VMT and vehicle trips, and recommends annual monitoring reports to demonstrate effectiveness. The comment acknowledges that proposed parking is below City minimum requirements, but suggests further reducing the parking supply, based on proximity to a Bay Area Rapid Transit (BART) Station. The comment, which is not a question or concern regarding the adequacy of the Draft EIR analysis, is noted.

Regarding TDM, refer to Response to Comment 2-2 and Response to Comment 2-3. Because there is no significant impact associated with an increased number of trips, no mitigation can be imposed. Regarding the request to conduct annual monitoring for proposed mitigation measures, the City would adopt a mitigation monitoring and reporting plan to track implementation of adopted mitigation measures. If the commenter is referring to measures within the TDM required by C/CAG, the TDM program will contain monitoring requirements to meet C/CAG guidelines.

Response to Comment 2-5

The comment encourages the City of San Bruno to request fair share contributions from the developer and offers specific projects in the vicinity of the project site.

Because there are no significant impacts identified to transportation, no mitigation can be imposed. Nonetheless, the City acknowledges receipt of this information for consideration.

Response to Comment 2-6

The comment shares the *Caltrans District 4 Bike Plan Update* and asks that it be reviewed and identified in Section 3.14, *Transportation*, of the EIR. The EIR's transportation consultant reviewed the *District 4 Bike Plan Update*, which was published after the release of the project's Notice of Preparation, and determined that it does not include any recommendations that are in conflict with the project plans for the circulation network.

The comment also requests details on the types of bicycle facilities that will be provided within the project site. The project has committed to providing low-stress bicycle facilities throughout the site including a combination of Class I, Class II, and Class III facilities as appropriate for the character of the various internal roadways. The specific roadway facilities will be guided by PD zoning requirements. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 2-7

The comment flags overlap of project off-site improvements on Sneath Lane at El Camino Real with California Department of Transportation (Caltrans) SHOPP project EA 04-0AA32/Project ID 0419000463 and provides contact information for the Caltrans regional project manager so that the City of San Bruno can coordinate plans and ensure compatibility.

The City acknowledges receipt of information regarding Caltrans's project and the Caltrans project point of contact. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 2-8

The comment requests ensuring that any increase in stormwater runoff to state drainage systems are treated, contained on the project site, and metered to preconstruction levels.

Stormwater quality is addressed in the Draft EIR under Impact HWQ-1. As discussed in the Draft EIR beginning on page 3.8-22, stormwater would be treated in compliance with MRP Provision C.3 requirements. The stormwater management measures proposed for the project would reduce pollutant discharges from stormwater through filtration and infiltration. The project would include nine bioretention areas and would be sized based on the flow-based sizing criteria. A Stormwater Control Plan Report, a description of site design and source control measures, drainage management areas, stormwater treatment measure sizing calculations, and a maintenance plan, would be submitted with the final design plans.

Stormwater runoff flow rate and volume are addressed in the Draft EIR under Impact UT-1. Beginning on page 3.16-22, the Draft EIR explains that, under proposed conditions, on-site drainage

areas would be resized but would generally collect runoff from the same contributing runoff area. As a result of the proposed shift in drainage areas, the storm drain mains on Sneath Lane are predicted to experience an increase in peak flow and total volume. Drainage design would match the existing discharge locations and flow rates and volumes as much as possible. Additionally, Mitigation Measure HWQ-3 requires a site survey to verify the existing system along Sneath Avenue can adequately accommodate the additional stormwater flow rates and volumes. Any increase in peak flow would be detained on-site and metered at the existing discharge rate in the final design.

The comment also states that any floodplain impacts must be documented and mitigated. As noted in the Draft EIR, the project site is not within the 100-year floodplain. Therefore, the project site would not be subject to inundation by a flood and the impact was not further evaluated. More generally, the potential for the project to change drainage patterns and result in flooding on-site or off-site is discussed in Impact HWQ-3. No revisions to the Draft EIR are required.

Response to Comment 2-9

The comment expresses concern regarding the potential impacts that the project may have on the existing drainage systems at State Route (SR) 82, specifically if surface flow would get into the roadside gutter along SR 82.

As discussed in the Draft EIR Section 2.6.13.3, *Stormwater*, an 18-inch storm drain is proposed on the southern boundary (adjacent to Interstate 380) and through the center of the project site and would convey runoff via 24-inch storm drains to existing storm drains north and east of the project site, away from SR 82. Page 3.8-27 of the Draft EIR further states the following.

> All drainage facilities would be designed to meet City of San Bruno standards and would drain to the existing public storm drain system. Runoff would continue to drain north to an existing 36-inch drain on Sneath Lane and east to an existing 48-inch storm drain system on Huntington Avenue, respectively. The 25-year and 100-year storm events would be considered in the project design consistent with the City's municipal code requirements. The storm drain capacity evaluation also accounts for projected buildout under the City's Storm Drain Master Plan.

The project would comply with all applicable Caltrans permitting requirements. A Stormwater Control Plan Report, a description of site design and source control measures, drainage management areas, stormwater treatment measure sizing calculations, and a maintenance plan would be submitted with the final design plans as appropriate for Caltrans approvals (which are noted in Draft EIR Section 2.8, *Other Potential Approvals*). No revisions to the Draft EIR are required.

Response to Comment 2-10

The comment requests consideration that the ambient air quality data in the Draft EIR, which reflect the period of 2021 to 2023, be revised to reflect data from the period of 2022 to 2024.

In the Final EIR, Table 3.1-4 has been revised to change the period of the ambient air quality data to 2022 to 2024 instead of 2021 to 2023 in the Draft EIR. The most recent year for which data are available is currently 2024.

Response to Comment 2-11

The comment requests consideration for rephrasing text on Draft EIR page 3.1-21 regarding the Bay Area Air District's screening criteria for localized carbon monoxide impacts.

To clarify, the text the commenter excerpted from Section 3.1.3.1, *Environmental Impact Analysis,* on page 3.1-21 of the Draft EIR in this comment corresponds to text from Section 4.2, *Local Carbon Monoxide*, of the Bay Area Air District's *California Environmental Quality Act Air Quality Guidelines*,[10] rather than the introductory text on page 4-1 cited in the comment. Regardless, Draft EIR page 3.1-21has been revised to improve clarity and ensure consistency with Section 4.2 of the Air District's CEQA Guidelines. Note that the Draft EIR implied that a detailed assessment would not be required if the screening criteria are *not* met. The Final EIR has, therefore, been revised to state that a detailed assessment of local carbon monoxide impacts including quantitative dispersion modeling, would not be required if all applicable screening criteria are met.

Response to Comment 2-12

The comment confirms Mitigation Measure CUL-2-A and Mitigation Measure CUL-2-B will be implemented if there is an inadvertent archaeological or burial discovery within Caltrans' Right-of-Way (ROW) and outlines additional steps to be taken to evaluate the findings. Mitigation Measure CUL-2-A and Mitigation Measure CUL-2-B have been revised in Final EIR Chapter 3*, Revisions to the Draft EIR*, as requested by the commenter.

Response to Comment 2-13

The commenter advises that any temporary or permanent work including traffic control that encroaches in, under, or over any portion of the state highway ROW requires a Caltrans-issued encroachment permit. The commenter then describes the submittal and approval process for obtaining an encroachment permit.

The City acknowledges receipt of this information about encroachment permits for work within Caltrans ROW. The Draft EIR states that such an approval or permit may be necessary in Section 2.8, *Other Potential Approvals*. No revisions to the Draft EIR are required.

Responses to Comment Letter 3 (San Mateo County Groundwater Protection Program)

Response to Comment 3-1

The comment notes the need for a site management plan to be submitted and approved to ensure proper management and disposal of all potentially impacted media.

As discussed under Impact HAZ-2 in Section 3.7, *Hazards and Hazardous Materials*, of the Draft EIR, **Mitigation Measure HAZ-2-A** requires the project applicant to implement a Soil Management Plan to minimize potential exposure to contaminated soils and groundwater. Implementation of the Soil Management Plan would require coordination with the San Mateo County Environmental Health Division. Further, because of the potential for exposure to contaminated groundwater, groundwater quality monitoring during dewatering would be required prior to disposal, as well as water quality

[10] Bay Area Air Quality Management District. 2023. *California Environmental Quality Act Air Quality Guidelines – Chapter 4 Screening for Criteria Air Pollutants and Precursors*. Available: https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqa-guidelines-chapter-4-screening_final-pdf.pdf?rev=ac551d35a52d479dad475e7d4c57afa6&sc_lang=en. Accessed: August 19, 2025.

testing prior to disposal to ensure there are no impacts on surface water quality, in accordance with **Mitigation Measure HWQ-1**. If contaminated groundwater is encountered, the project would comply with San Francisco Bay Regional Water Quality Control Board (SFBRWQCB) dewatering requirements, Construction General Permit dewatering requirements, discharge sampling and reporting requirements, and SFBRWQCB's Fuel and VOC General Permit (Order No. R2-2017-0048). The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Responses to Comment Letter 4 (San Francisco Public Utilities Commission)

Response to Comment 4-1

The commenter requests advising the project sponsor of the location of its San Andreas Pipeline No. 1 adjacent to the project site in addition to a request to submit an Underground Service Alert request prior to construction. The commenter notes additional review may be needed for underground work around or near the pipeline.

The City acknowledges receipt of this information regarding San Francisco Public Utilities Commission (SFPUC)'s San Andreas Pipeline No. 1. Note that this pipeline's location is discussed in the Draft EIR on page 2-4 as part of the project description. Additionally, page 3.16-19 states:

> The project sponsor will also be required to obtain an Underground Service Alert request from SFPUC because SFPUC's Number 1 water transmission pipeline is within the El Camino Real Public Right-of-Way.

No revisions to the Draft EIR are required.

Responses to Comment Letter 5 (One Shoreline)

Response to Comment 5-1

The comment provides an introductory statement and summarizes the areas of the Draft EIR on which their review focused, specifically hydrology and stormwater management.

Comment noted. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 5-2

The commenter states that OneShoreline's Board adopted Planning Policy Guidance (PPG) in 2023, which provides standardized yet evolving guidance to cities and the San Mateo County to account for anticipated increases in flooding, sea level rise, and shallow groundwater rise. The commenter notes that the project site is outside of OneShoreline's Map of Future Conditions but asserts that recommendations related to extreme storms are relevant to the project site, and requests adding OneShoreline's PPG to the EIR and reviewing the PPG to determine whether additional measures from the PPG could increase project resilience.

Comment noted. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 5-3

The comment notes that the Sneath Lane and Huntington Avenue storm drain lines may drain to the Colma Creek system rather than to the City's stormwater system tributary to San Bruno Creek.

As shown in Figure 1 in Draft EIR Appendix 3.8-1, *Storm Drain System Capacity Study*, prepared by Lotus Water Engineering (March 2025), the existing drainage network has connections to San Bruno's storm drain system at four points along Sneath Lane and Huntington Avenue. All four of these connections drain easterly along Tanforan Avenue/Shaw Road before discharging into Navigable Slough, a tributary of Colma Creek. Almost the entire project site discharges into this system. A very small amount of surface runoff in the southeast corner of the project site flows into a catch basin located in that corner, which ties into a different portion of the City's storm drain system that drains southerly before eventually discharging into San Bruno Creek.

Page 3.8-15 of the Draft EIR and Draft EIR Appendix 3.8-1, *Storm Drain System Capacity Study*, have been revised to clarify the existing drainage patterns on-site, consistent with the description above. The peak flows and total volumes draining toward each receiving water body (Colma Creek and San Bruno Creek) would decrease under proposed conditions, so downstream modeling of the storm drain system is not required for the Draft EIR analysis. Therefore, the revisions clarify information in the Draft EIR and do not change the Draft EIR analysis or conclusions.

Response to Comment 5-4

The comment asks to clarify the basis for the assumed soil parameters. The National Resource Conservation Service Web Soil Survey was used to obtain representative soil characteristics at the site. The survey identifies the site as Map Unit 131, Urban Land with no specific soil info. Adjacent soil types are Map Units 121 (west) and 132 (east), which are both described as well drained with no ponding and no flooding and with a deep water table. Pervious area was modeled using Green Ampt parameters for silt loam. The U.S. Environmental Protection Agency (EPA) Stormwater Management Model (SWMM) recommends an infiltration rate of 0.26 inch/hour for silt loam, and the value entered for this model parameter was 0.20 inch/hour.

While the project site was very likely developed using fill material, that material is unlikely to be Bay Mud given its notoriously poor structural qualities. Per the survey, soils within the surrounding watershed predominantly belong to hydrologic soil group C, and site soils were assumed to be comparable. Additionally, landscaped areas typically involve imported soil with well-draining qualities.

A sensitivity analysis was conducted comparing different soil parameters for silt loam (group C) versus Sandy Clay (group D) using EPA SWMM's recommended parameters for those. All general conclusions hold for either soil scenario. There is a slight uptick in runoff volume and peak flow for Sandy Clay as compared to silt loam. Based on the analysis, the selected soil parameters are justified and changing them to be more conservative would not meaningfully change the results or any required mitigation. No revisions to the Draft EIR are required.

Response to Comment 5-5

The comment notes that the project's proposed stormwater design and operational considerations appear to rely on design flows from National Oceanic and Atmospheric Administration (NOAA) Atlas 14, which reflect historical rather than current or projected future conditions.

The Draft EIR analysis is consistent with current, applicable regulatory requirements, The stormwater analysis applied the 24-hour, 25-year design storm as represented by NOAA Atlas 14, which is understood to be the prevailing standard for where to obtain rainfall data. No revisions to the Draft EIR are required.

Response to Comment 5-6

The comment recommends providing additional stormwater benefits exceeding regulatory no-net-increase and water quality standards.

The project would include bioretention areas and infiltration via sustainable landscaping to manage stormwater runoff and reduce contamination from pesticides and fertilizers. Low impact development (LID) treatment methods and compliance with the City's Green Infrastructure Plan guidelines and other stormwater management requirements would also be applied to the project. All stormwater runoff would be treated using LID measures, as required per Provision C.3 of the Municipal Regional Permit. Potential LID measures for the project include rainwater harvesting and reuse for non-potable water uses, infiltration, and bioretention. Roof runoff would either be directed into cisterns or rain barrels and used for irrigation or other non-potable uses or directed to vegetated area. A Stormwater Control Plan Report, a description of site design and source control measures, drainage management areas, stormwater treatment measure sizing calculations, and a maintenance plan, would be submitted with the final design plans. All project-related stormwater management facilities would comply with local, state and federal requirements for water quality treatment and stormwater management. Any increase in peak flow would be detained on-site and metered at the existing discharge rate in the final design. Implementation of Mitigation Measure HWQ-3 would minimize changes in stormwater peak runoff flows and total volume. No revisions to the Draft EIR are required.

Response to Comment 5-7

The comment suggests incorporating flexibility into the project's stormwater management design such as trigger-based commitments to provide accountability for future adaptation.

Provision C.3 states that "all projects, regardless of size, should consider incorporating appropriate source control and site design measures that minimize stormwater pollutant discharges to the maximum extent practicable". As required by the San Francisco Bay Municipal Regional Permit, stormwater best management practices would be inspected, maintained, and properly managed to ensure adequate site control and minimize the potential for polluted stormwater runoff during project operations. A Stormwater Control Plan Report, a description of site design and source control measures, stormwater treatment measure sizing calculations, and a maintenance plan would be submitted with the final design plans. No revisions to the Draft EIR are required.

Response to Comment 5-8

The comment commends the project design for recognizing the importance of managing stormwater and minimizing flood risk.

Comment noted. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Responses to Comment Letter 6 (San Francisco International Airport)

Response to Comment 6-1

The comment expresses appreciation for the opportunity to review and comment on the Draft EIR. The comment references past comment letters on the project, dated January 14, 2024 and December 16, 2022, and states that redeveloping the site with residential uses is incompatible with the noise compatibility policies of the SFO ALUCP and expresses concerns regarding the project. The comment refers to four other agencies and organizations who have submitted letters also expressing their concerns regarding the development of residential uses including Caltrans (January 25, 2022; January 17, 2024); FAA (May 18, 2022; January 18, 2024); the SFO Airport/Community Roundtable (May 24, 2022); and C/CAG (January 17, 2024).

The City acknowledges receipt of this summary of prior letters and the commenter's concerns, which will be included in the record for consideration by decision-makers before any action on the project. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 6-2

The comment summarizes the main features of the project.

The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 6-3

The comment states that the project site is within and subject to the requirements of Airport Influence Area A and Area B, and that the Draft EIR identifies the responsible parties for maintaining compatibility and responsible actions with the ALUCP.

The Draft EIR notes on page 2-8, among other places, that the project site is within Airport Influence Areas A and B. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 6-4

The comment describes the project's location within the CNEL 70 dBA noise contour of the SFO ALUCP and states that aircraft operation noise impacts on future residents would not be mitigable.

See Master Response 2 (ALUCP Compatibility and Impacts) for a discussion of the proposed project's consistency with the SFO ALUCP noise policies, as well as noise impacts related to the project's location within the ALUCP.

Response to Comment 6-5

The comment states that commercial and industrial uses within the most noise-exposed areas of the city have served both the community and the airport well for decades. The comment notes that these areas are now being identified for rezoning and redevelopment for high-density housing because of their location adjacent to San Bruno BART and Caltrain stations and the El Camino Real bus corridor. The comment states support for practical housing development to address the region's affordability crisis but asserts that adding housing in these areas is neither practical nor desirable, and that needed housing and meeting Regional Housing Needs Allocation obligations cannot come at the expense of future residents' health and wellbeing.

This comment pertains to the merit of the project. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. However, it is included in the record for consideration by decision-makers before their action on the project.

Response to Comment 6-6

The comment states that residential development within the CNEL 70 dBA noise contour would be incompatible with the ALUCP under Noise Compatibility Policy NP-4. The comment states that interior insulation would not address outdoor noise in amenity spaces and that opening a window would compromise efficiency of insulation related to interior noise.

See Master Response 2 (ALUCP Compatibility and Impacts) for a discussion of noise mitigation related to aircraft operations.

Response to Comment 6-7

The comment describes the history and successes of SFO's NIP, which has funded and implemented noise insulation in various buildings to achieve land use compatibility within the ALUCP's CNEL 65 dB noise contour, and asserts that the project would undermine prior planning and expenditures on noise mitigation. The commenter asserts that materials and technology used for sound insulation eventually fail, and states that noise insulation used within the Tanforan project would eventually fail. The comment describes limitations on City and County of San Francisco/SFO liability and an inability to address airport noise complaints. The comment asserts that there are no viable aircraft noise abatement or noise mitigation measures that could reduce noise, and further asserts that the project would have uniquely dense development in proximity to an airport.

See Master Response 2 (ALUCP Compatibility and Impacts) for a discussion of noise mitigation related to aircraft operations.

Response to Comment 6-8

The comment asserts that the baseline noise condition for future residents could be avoided if the City identifies other locations for housing outside of the CNEL 70 dBA contour and asserts that the

City has failed to take zoning actions at other sites to increase residential density in compatible areas of the City.

See Master Response 2 (ALUCP Compatibility and Impacts) for a discussion of off-site alternatives to the proposed project.

Response to Comment 6-9

The comment states that SFO encourages the City to consider Safety Zone 4 compatibility policies during the master planning and site development phases of the project to prevent development of incompatible uses.

The Draft EIR discusses Safety Zone 4 policies in detail throughout the document, including Section 3.7.2.1, *Regulatory Setting,* Impact HAZ-1, and Impact HAZ-5. Regarding Safety Zone 4, page 2-8 of the Draft EIR states: "Large child day care centers, biosafety level (BSL) 3 and 4 facilities, hospitals, nursing homes and children's schools are incompatible with the site's location in Safety Zone 4 of the ALUCP. These uses would be prohibited in the portion of the project site within Safety Zone 4 under the proposed P-D zoning district" (footnotes omitted). Additional discussion is provided under Impact HAZ- 5. No revisions to the Draft EIR are required.

Response to Comment 6-10

The comment asserts that building heights would need to be no higher than approximately 55 and 90 feet above ground level to be compatible with the Airspace Protection Policies of the SFO ALUCP. Compatibility would also be contingent on the issuance of a Determination of No Hazard from the FAA for any proposed structures and determinations from C/CAG. Also, FAA review would be required for both the permanent structures and any temporary cranes or other equipment taller than the permanent buildings that would be required to construct those structures.

See Master Response 2 (ALUCP Compatibility and Impacts) for a discussion of hazards related to building heights. See also Chapter 3, *Revisions to the Draft EIR*, regarding site elevation and maximum allowable building heights. As shown therein, the heights of the proposed buildings could be no higher than approximately 74 and 105 feet above ground level to be compatible with the SFO ALUCP.

Response to Comment 6-11

The comment calls attention to Airspace Protection Policies AP-1 through AP-4 of the SFO ALUCP, related to incompatible site characteristics as they pertain to wildlife hazards and solar panel or building materials/features that reflect and create bright lights or glare.

The City acknowledges receipt of the Airspace Protection Policies. Refer to Master Response 2 (ALUCP Compatibility and Impacts) regarding aircraft bird strikes. Regarding solar panels, refer to Response to Comment 6-15. The Draft EIR in discussing ALUCP Policy AP-4 states under Impact HAZ-5 that the proposed project would not include highly reflective buildings or building features, search lights or laser displays, or otherwise distracting lights.

Response to Comment 6-12

The comment provides introductory text regarding more detailed comments about how Draft EIR Section 3.7, *Hazards and Hazardous Materials*, and asserts that Section 3.7 includes inaccuracies, mischaracterizations, and errors pertaining to the project near an airport.

This comment is introductory text. Specific comments are addressed below.

Response to Comment 6-13

The comment asserts that the Draft EIR mischaracterizes the risk of bird strikes and should include stronger mitigation measures to ensure that bird populations are monitored and managed and cites FAA Advisory Circular 150/5200-33B, Hazardous Wildlife Attractants On or Near Airports (FAA 2007). The comment also asserts that landscaping features would attract birds, which pose a significant safety hazard to aircraft and passengers that are taking off or landing at SFO and could result in the catastrophic loss of human life.

Refer to Master Response 2 (ALUCP Compatibility and Impacts) regarding aircraft bird strikes.

Response to Comment 6-14

The comment states that the Draft EIR should include a mitigation measure that ensures an FAA-certified wildlife biologist will evaluate the landscaping features of the project to confirm that they will not attract birds or affect bird population dynamics and flight patterns. The comment also asserts that mitigation measures should include monitoring in the future to ensure that if the bird population increases at the proposed project or if bird flight patterns are affected in a way that is a potential hazard to the airport that the project proponent will commit to measures that address this issue.

Refer to Master Response 2 (ALUCP Compatibility and Impacts) regarding aircraft bird strikes. As discussed therein, Mitigation Measure HAZ-5 has been revised in Chapter 3, *Revisions to the Draft EIR*, to include additional requirements for landscape evaluation at the project site by a qualified biologist.

Response to Comment 6-15

The comment states that rooftop solar panels can pose a flight safety hazard to pilots and that the EIR should include a mitigation measure to require that an analysis ensure glare does not affect pilot vision.

Impact HAZ-5 of the Draft EIR notes that the project must comply with the ALUCP's restrictions on "sources of glare, such as highly reflective buildings or building features, or bright lights, including search lights or laser displays, which would interfere with the vision of pilots making approaches to the Airport," as set forth in Airspace Protection Policy AP-4. The Draft EIR specifically addresses only glare impacts from electric lighting at the project. Given that Protection Policy AP-4 also addresses sources of glare from reflective buildings or building features, the Final EIR has been revised to note that no building features, including any rooftop solar panels, would use highly reflective materials with the potential to interfere with the vision of pilots at SFO.

FAA regulations specifically require glare analysis for projects *directly on* airport property, but not for structures outside of airport property, unless they adversely affect air safety. See, 14 CFR Part 77, Section 77.9; Federal Aviation Administration, Office of Airport Planning and Programming, *Technical Guidance for Evaluating Selected Solar Technologies on Airports* (FAA Solar Guide) (2018), p. 40. The FAA Solar Guide notes solar photovoltaic (PV) panels, like those proposed for the project, are generally "constructed of dark, light-absorbing materials and covered with an anti-reflective coating designed to maximize absorption and minimize reflection," though "reflected sunlight can increase with lower incidence angles." (*Id.* at p. 39.) Any PV panels included in the project would be selected and installed to minimize reflectivity, with potential approaches including those referenced in the FAA Solar Guide discussed above.

Response to Comment 6-16

The comment states that Mitigation Measure HAZ-5 is partially incorrect in how it addresses temporary construction crane requirements associated with maximum heights in applicable SFO ALUCP airspace protection policies. The comment also states that building height in excess of the critical aeronautical surfaces in the SFO ALUCP are prohibited and that the FAA will not make a determination that a building exceeding the ALUCP's critical aeronautical surfaces would not result in a hazard to air navigation. The comment further requests restatement of related language in the mitigation measure.

Mitigation Measure HAZ-5 has been revised as described in Response to Comment 1-2. Refer to Master Response 2 (ALUCP Compatibility and Impacts) regarding the FAA's review of building and equipment heights.

Response to Comment 6-17

The comment asserts that Impact NOI-3 should be significant and unavoidable with mitigation rather than less than significant with mitigation based on incompatibility with the SFO ALUCP. The comment describes the project's location within the CNEL 70 dBA noise contour of the SFO ALUCP and states that aircraft operation noise impacts on future residents would not be mitigable. The comment notes that materials and technology used for sound insultation eventually fail, and states that noise insultation used within the Tanforan project would eventually fail. The comment also states that outdoor noise is unaccounted for, and that mitigation is not effective once windows are open. The comment states that there are no viable aircraft noise abatement or noise mitigation measures that could reduce noise. The comment further requests revisions to Mitigation Measure NOI-3.

See Master Response 2 (ALUCP Compatibility and Impacts) for a discussion of project compatibility with the SFO ALUCP noise policies as well as noise impacts on future residents from aircraft operation. As discussed therein, Mitigation Measure NOI-3 has been revised in Chapter 3, *Revisions to the Draft EIR*, to clarify the threshold of 45 dBA CNEL, and require provisions to ensure ongoing efficacy of noise-reducing features and materials.

Response to Comment 6-18

The comment disagrees with the conclusion of Impact LU-2 because there is a conflict with the SFO ALUCP Noise Policy prohibiting residential development in the CNEL 70 dBA noise contour of the SFO ALUCP.

A conflict with a plan in and of itself is not considered an environmental impact; rather, an EIR must evaluate whether there are any significant environmental impacts caused by a conflict with a plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The *Final Statement of Reasons for Regulatory Action, Amendments to the State CEQA Guidelines* (California Natural Resources Agency 2018) discusses conflicts with plans in the context of certain land use plans:

> [T]he Agency clarified that the focus of the analysis should not be on the "conflict" with the plan, but instead, on any adverse environmental impact that might result from a conflict. For example, destruction of habitat that results from development in conflict with a habitat conservation plan might lead to a significant environmental impact. The focus, however, should be on the impact on the environment, not on the conflict with the plan.

Therefore, the EIR complies with the need to disclose conflicts with plans, and properly analyzes whether those conflicts cause a significant environmental impact. A conflict with the ALUCP in and of itself is not a significant environmental impact under CEQA.

See also Master Response 2 (ALUCP Compatibility and Impacts) for a discussion of project compatibility with the SFO ALUCP noise policies as well as noise impacts on future residents from aircraft operation.

Response to Comment 6-19

The comment asserts that aircraft noise impacts on future residents could be avoided if the City identifies other locations for housing outside of the CNEL 70 dBA contour, and that an off-site alternative should have been included and analyzed in the Draft EIR.

See Master Response 2 (ALUCP Compatibility and Impacts) for a discussion of off-site alternatives to the proposed project.

Response to Comment 6-20

The comment requests that the City re-evaluate its plans for housing in the CNEL 70 dBA contour, and encourages the City to identify other locations for housing outside of the CNEL 70 dBA contour.

See Master Response 2 (ALUCP Compatibility and Impacts) for a discussion of off-site alternatives to the proposed project.

Responses to Comment Letter 7 (San Mateo County Transit District)

Response to Comment 7-1

The comment identifies an inaccuracy in the stated passenger capacity of SamTrans' largest bus. The capacity was stated as 120 passengers when the real capacity is 52 to 78. Adjusting the capacity also requires an adjustment to the stated available capacity on Route El Camino Real near the project site.

Page 3.14-11 of the Draft EIR has been revised to clarify the passenger capacity on SamTrans' largest bus in Final EIR, Chapter 3, *Revisions to the Draft EIR*.

These adjustments still result in adequate capacity to accommodate new riders and do not change the Draft EIR analysis outcomes.

Responses to Comment Letter 8 (Nicholas Wilsey)

Response to Comment 8-1

The comment identifies the Centennial Way Trail as a Class I trail adjacent to the project site. The comment notes that this is a unique trail and an important access route for the project. The connections to the Centennial Way Trail were considered in the Draft EIR analysis and the trail is mapped in Figure 3.14-4. The direct connections from BART to the trail across Huntington Avenue and Sneath Lane/Southline Avenue are currently under construction as part of the Southline Transmission Project (Southline project) and were considered in Baseline and Cumulative Conditions.

Comment noted. No revisions to the Draft EIR are required.

Response to Comment 8-2

The comment asserts that the Draft EIR includes limited information about the types of bicycle infrastructure in the project plans, and asserts that this does not allow for effective assessment of impacts to the bicycle network. The comment accurately summarizes the bicycle facilities described in the project description and analyzed in the Draft EIR. The project's proposals for the external bicycle network are consistent with the plans referenced in the comment: San Bruno Walk 'N Bike Plan, San Bruno Local Roadway Safety Plan, and the San Mateo County Comprehensive Bicycle and Pedestrian Plan 2021, and impacts related to conflicts with bicycles were determined to be less than significant (Impact TRA-1 and Impact TRA-3).

The project's internal street network is not discussed in the city or county plans listed above. Nonetheless, the project has committed to providing low-stress bicycle facilities throughout the site including a combination of Class I, Class II, and Class III facilities as appropriate for the character of the various internal roadways. The specific roadway facilities will be guided by Planned Development zoning requirements. The details of these facilities are not required to adequately assess the transportation impacts of the project and no revisions to the Draft EIR are required.

Response to Comment 8-3

The comment requests additional details on the Centennial Way Trail and the projects connection to the Centennial Way Trail. The project is anticipated to increase the number of people walking and rolling on Centennial Way Trail but would otherwise not change the facility or the amenities on it. Therefore, the details of the amenities on the trail today are beyond the scope of this EIR analysis.

Page 3.14-17 of the Draft EIR has been revised describe Centennial Way Trail Class I facility access to the site in Final EIR, Chapter 3, *Revisions to the Draft EIR*.

Response to Comment 8-4

The comment identifies the Centennial Way Trail as a walk-and-bike facility adjacent to the project site and requests additional details on connections between the project and the trail. The direct

connections from BART to the trail across Huntington Avenue and Sneath Lane/Southline Avenue are currently under construction as part of the Southline project and were considered in Baseline and Cumulative Conditions. Residential Building 3 on the north side of Sneath Lane would connect to the Centennial Way Trail using the existing sidewalk infrastructure. Furthermore, the project's proposals for the external bicycle network are consistent with the plans referenced in the comment: San Bruno Walk 'N Bike Plan and the Active South City Plan. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 8-5

The comment requests additional details on the internal bicycle network.

The project's internal bicycle network is not discussed in any of the city or county plans listed above. Nonetheless, the project has committed to providing low-stress bicycle facilities throughout the site including a combination of Class I, Class II, and Class III facilities as appropriate for the character of the various internal roadways. The connections to external streets will follow Manual on Uniform Traffic Control Devices guidance and Caltrans guidance (on El Camino Real). The exact details of these facilities are not required to adequately assess the transportation impacts of the project on bicycles, which were determined to be less than significant, and no revisions to the Draft EIR are required.

Response to Comment 8-6

The comment requests additional details on the active transportation changes included in the Southline project and the Active South City Plan.

These plans were reviewed and considered as part of the impact analysis. The project is not in conflict with any of these plans. No revisions to the Draft EIR are required.

Response to Comment 8-7

The comment provides suggestions for improved circulation within the project site and connecting to BART. The project site connections with BART will be guided by Planned Development zoning requirements.

Comment noted. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 8-8

The comment identifies the unique opportunity to build a transit-oriented development in this location. The comment identifies concerns with the completeness of the EIR in reviewing the adjacent transportation network and project connections to the adjacent network.

As addressed in Response to Comments 8-1, 8-2, and 8-3, the Draft EIR analysis did identify and evaluate the facilities (i.e., the Centennial Way Trail) and the connections (i.e., to BART, the Centennial Way Trail, and future planned facilities in the Active South City and San Bruno Walk n' Bike Plan) raised in the comment. The comment also questions the accuracy of the VMT calculations,

but the assumptions regarding the bicycle network and connections to the Centennial Way Trail do not affect the VMT impact analysis under Impact TRA-2. No revisions to the Draft EIR are required.

Responses to Comment Letter 9 (Tim and Julia Gretter Fernandez)

Response to Comment 9-1

The comment notes that the commenters are homeowners on Atlantic Avenue and have concerns regarding impacts on air quality during project construction. The commenters express a desire for each home in their neighborhood to be able to request a High-Efficiency Particulate Air (HEPA) air purifier.

Regarding the request for HEPA air purifiers, please refer to Master Response 1 (Air Quality).The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 9-2

The comment requests that no construction occur after 5:00 p.m. due to noise concerns. Project construction activities would generally occur during daytime hours except for concrete pours. Concrete pours often must occur during nighttime hours because cooler temperatures and higher humidity levels provide better conditions for concrete curing. Equipment used for concrete pours would be staged at least 50 feet back from the project perimeter, resulting in all equipment being at least 200 feet from the nearest off-site residences (east of Huntington Avenue), and usually farther. In addition, best management practices (described in the Draft EIR) and mitigation measures NOI-1A (requiring the development of a Construction Noise Control Plan for non-daytime work) and NOI-1B (requiring a temporary noise barrier for nighttime work within 500 feet of residences) would be implemented, helping to reduce non-daytime construction noise. However, as stated in the Draft EIR, non-daytime construction noise impacts would be significant and unavoidable with mitigation.

The comment also expresses an interest in noise-reducing window upgrades. CEQA requires rough proportionality between the severity of a significant impact and the burden imposed by the mitigation. Permanent upgrades to off-site individual homes are not an appropriate mitigation strategy to address noise during temporary and intermittent non-daytime construction. Specifically, the number of instances of non-daytime construction within 500 feet of residences is estimated to be approximately 14. In addition, many of these instances of nighttime construction would be early morning construction, beginning at 5:00 a.m., and would not occur throughout the duration of a single night. Permanent window upgrades for 14 individual instances of nighttime or early morning construction would not be a proportionate or reasonable mitigation measure under CEQA. Therefore, the suggested mitigation measure is not legally feasible.

The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Responses to Comment Letter 10 (George Reade)

Response to Comment 10-1

The commenter lives across the street from the BART station and expresses the desire to be provided with air purifiers and new windows for air pollution- and noise-related effects.

Regarding the request for air purifiers, please refer to Master Response 1 (Air Quality).

Regarding the request for new windows for noise reductions, see Response to Comment 9-2.

The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Responses to Comment Letter 11 (Shirley Reed)

Response to Comment 11-1

The comment raises concern with the proposed parking supply, and asserts that 8-story buildings are too tall for the site.

Adequacy of parking alone is not within the purview of CEQA because it is not an effect on the environment. Additionally, Senate Bill (SB) 743 (as codified in Public Resources Code Section 21099(d)(1)) provides that "parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." As explained on page 3.0-5 of the Draft EIR, this provision applies to the proposed project. Therefore, the EIR need not consider parking impacts.

Regarding building heights, as described on page 2-11, building heights for the proposed project would range from 1 to 7 stories (20 to 79 feet, 7 inches), with floor-to-floor heights varying.

The commenter's concerns about parking and building heights are included in the record for consideration by decision-makers prior to their action on the project.

Responses to Comment Hearing Transcript 12 (Isan)

Response to Comment 12-1

The commenter is a resident of San Bruno and states their family's property in the Fifth Addition was affected through air quality-related issues from the Southline project and that they have noticed particulates near that property. The commenter also states that there is a study being done that involves the University of California, Davis and air pollution monitors, and requests the same for being local to the proposed project site.

Regarding the request for an air quality study and air pollution monitors at existing residences, please refer to Master Response 1 (Air Quality).

The comment references air quality issues that are believed to be caused by the Southline project. Although the Southline project is a separate project and is not directly related to the proposed

project, cumulative impacts between the two projects are discussed in Chapter 5, *Other CEQA Considerations*, of the Draft EIR on page 5-25. The commenter is referred to that section of the Draft EIR for a discussion of the cumulative considerations between the two projects.

The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 12-2

The comment expresses concern regarding the potential for building with heights of up to eight floors at the project site. The commenters state that they do not want eight-level hotels or eight-level apartment buildings and add they would approve of six-level buildings.

As described on page 2-11, building heights for the proposed project would range from one to seven stories (20 to 79 feet, 7 inches), with floor-to-floor heights varying. These comments are noted. No revisions to the Draft EIR are required.

Response to Comment 12-3

The comment requests monetary compensation for all the homes that would be affected in terms of noise and air quality impacts related to the proposed project. The comment suggests $25,000 per house. See Master Response 1 (Air Quality).

Response to Comment 12-4

The comment requests that the Tanforan project developers consider donating $4 million to a reopened San Bruno community foundation fund for which community organizers can apply for grants.

Comment noted. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Responses to Comment Hearing Transcript 13 (Matt)

Response to Comment 13-1

The commenter provides an introductory statement and describes themself as a former City employee and resident of District 3.

Comment noted. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 13-2

The commenter states that they were glad to see mitigation of biological resources for nesting birds, and during the last redevelopment of Tanforan, there were birds that were landing in neighbors' yards. The commenter also asks if there would be a biological study regarding nesting birds.

Mitigation Measure BIO-1-A described on page 3.2-10 of the Draft EIR requires preconstruction nesting bird surveys, which would need to be performed before any demolition or construction

activities. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 13-3

The comment asks questions about the travel demand methodology, including mode split and trip generation for both the project and for background projects. The methodology and answers to these questions are covered in Draft EIR Section 3.14.3.2, *Methodology and Approach*. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 13-4

The comment asks whether there are sufficient water supplies available to serve the project, and notes that the City relies on groundwater for a portion of its water supply.

The project's impacts on water supply are evaluated in Section 3.16, *Utilities*, of the Draft EIR. As noted on page 3.16-8 of the Draft EIR, the City currently uses water from the following sources.

- Treated surface water from the City and County of San Francisco's Regional Water System, operated by SFPUC, served through four connections to the City's water system.
- Treated surface water purchased from the North Coast County Water District.
- Local groundwater from the Westside Groundwater Basin.

The water supply analysis in Impact UT-2 concludes that sufficient water supplies are available to serve the project, and impacts would be less than significant. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 13-5

The comment suggests the engagement of the Japanese-American committee responsible for part of the off-site memorials and interpretative signage around the BART station as part of the cultural monitoring of the project.

Mitigation Measure CUL-1 outlines the removal, protections, storage, and reinstallation of the on-site memorial plaque and commemorative garden to maintain the physical attributes, feeling, and association as was designed with community engagement during the on-site memorial's initial contemporary installation. The EIR provides substantial evidence to support the sufficiency of the mitigation in mitigating the significant impact. No revisions to the Draft EIR are required. However, the comments will be forwarded to the decision-makers for their review and consideration.

Response to Comment 13-6

The commenter requests that extensive wind studies are prepared for the project and expresses concerns regarding debris and paints impacting neighboring residents.

Wind impacts are not included in Appendix G of the CEQA Guidelines, and the City has not adopted CEQA thresholds for wind impacts. Therefore, the Draft EIR does not evaluate wind impacts.

However, the comments will be forwarded to the decision-makers for their review and consideration.

Response to Comment 13-7

The comment states that the request for consideration of an alternative that does not include life sciences uses, because of concerns regarding toxic air during operations. Additionally, the comment stated concerns with the timeframe that operational emissions would occur and speculated that it could have negative effects on residents in the area.

For a summary of the significant impacts related to health risks on on-site receptors, please refer to Master Response 1 (Air Quality). As noted in that response, the Draft EIR did not identify any significant and unavoidable impacts on existing, off-site receptors in the project area from construction or operations. All modeled health risks and pollutant concentration values for off-site receptors were found to be less than the Air District's thresholds of significance, including those associated with the life sciences uses.

Responses to Comment Hearing Transcript 14 (George)

Response to Comment 14-1

The comment describes the commentors previous experiences with nighttime construction noise at the BART station adjacent to the project site. The commentor also expresses concerns about the efficacy of proposed construction noise mitigation measures, including sound barriers.

Comment noted. The Draft EIR evaluated potential construction noise impacts and determined that non-daytime construction noise impacts would be significant. Note that the only proposed construction activity for non-daytime hours is concrete pours. Concrete pours often must occur during nighttime hours because cooler temperatures and higher humidity levels provide better conditions for concrete curing. Equipment used for concrete pours would be staged at least 50 feet back from the project perimeter, resulting in all equipment being at least 200 feet from the nearest off-site residences (east of Huntington Avenue), and usually farther. Best management practices (described in the Draft EIR) would be implemented, along with mitigation measures NOI-1A (requiring the development of a Construction Noise Control Plan for non-daytime work) and NOI-1B (requiring a temporary noise barrier for nighttime work within 500 feet of residences). The Construction Noise Control Plan under Mitigation Measure NOI-1A would reduce non-daytime construction noise levels through implementation of several noise-reduction strategies (e.g., ensuring the use of mufflers and sound control devices on equipment used at night, locating stationary equipment as far as feasible from sensitive uses, reducing the use of back-up alarms). As described in the Draft EIR, while this mitigation measure would reduce construction noise effects, it may not be possible to reduce noise levels during all non-daytime construction activities to less-than-significant levels.

Mitigation Measure NOI-1-B includes the installation of a temporary construction noise barrier along the length of the project construction site near residential uses before nighttime construction activities take place within 500 feet of those residential uses. Although the mitigation measure does not stipulate the required height of the wall, the wall should be located within the direct line-of-sight path between the noise source and nearby sensitive receptors, as feasible; this could result in a

barrier that is 10-feet high, or higher, depending on the location of the equipment and the height of the nearest receptors. This wall would be expected to somewhat reduce construction noise as experienced at nearby residences. However, such a wall or barrier may not be feasible in all locations for all construction activities taking place before 8:00 a.m. (due to the need for construction trucks to enter or exit the site and depending on the location of the pour activities). In addition, installing a temporary construction noise barrier may not reduce noise from all activities to below the applicable significance criterion at the nearest receptors, even if noise is somewhat reduced. Therefore, the Draft EIR concluded that non-daytime construction noise impacts would be significant and unavoidable with mitigation.

Response to Comment 14-2

The commenter notes that they received a flyer that mentions air filters and possibly windows and are interested in those treatments.

Regarding the request for air purifiers, please refer to Master Response 1 (Air Quality).

Regarding the request for new windows for noise reductions, see Response to Comment 9-2.

The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 14-3

The commenter expresses apprehension regarding the flex zones in terms of what the view is and too many apartments but expresses support of life-science uses at the project site.

Comment noted. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Responses to Comment Letter 15 (Nor Cal Carpenters Union)

Response to Comment 15-1

The comment requests that the City mandate that construction activity related to the proposed project be conditional upon compliance with local hire and responsible contractor requirements as a means of reducing environmental impacts and augmenting the project's economic benefits to the community.

Comment noted. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Responses to Comment Letter 16 (Silicon Valley Bicycle Coalition)

Response to Comment 16-1

The comment provides an introductory statement explaining the commenter's intention of commenting on the project due to its regional and strategic significance due to its proximity to transit stations and potential for smart, transit-oriented, mixed-use development.

Comment noted. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 16-2

The comment highlights the project's location next to BART and SamTrans and supports the placement of housing in this location so that future residents can reduce their reliance on driving. The comment encourages implementation of a TDM Plan that includes further incentives to reduce driving and use alternative modes of travel.

The project will include a TDM Plan that complies with C/CAG requirements. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 16-3

The comment encourages the City of San Bruno and the project team to use this project to enhance bicycle facilities and connectivity around the project site as well as transit connections and priority around the project site.

Comment noted. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Responses to Comment Letter 17 (Climate Resilient Communities)

Response to Comment 17-1

The commenter provides an introductory statement and explains their intention of commenting on the Draft EIR. The commenter offers that their organization works to build climate resilience through inclusive, community-driven planning, adaptation, and implementation strategies.

Comment noted. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 17-2

The comment states the commenters' appreciation for the project's opportunities to provide new infill housing and expresses concern regarding the potential increase in local air pollution and the associated health risks during demolition, construction, and project operations. The comment states a particular concern regarding those effects on residents living nearby, seniors, young children, and people with pre-existing health conditions.

Regarding the potential impacts on people currently living and working in the project area (i.e. impacts on off-site receptors), please refer to Master Response 1 (Air Quality).

The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 17-3

The comment states that San Bruno experiences chronic air pollution due to local highways and the airport, and that the census tract adjacent to the project site has pollution burden above the 75th percentile among census tracts in California and receives more exposure to diesel particulate matter than 84 percent of census tracts.

For a summary of the significant impacts related to health risks on on-site receptors, please refer to Master Response 1 (Air Quality). As noted in that response, the Draft EIR did not identify any significant and unavoidable impacts on existing, off-site receptors in the project area. All modeled health risks and pollutant concentration values were found to be less than the Air District's thresholds of significance.

The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 17-4

The comment summarizes the impact determinations from the EIR for several resource areas, quoting from a City announcement.

The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required. It is also noted that only one air quality impact out of four cannot be reduced to less than significant (Impact AQ-3). Similarly, only one noise impact out of four (Impact NOI-1-A) cannot be reduced to less than significant.

Response to Comment 17-5

The comment requests that the City and project developers add mitigation measures to the EIR for community health protection and cites the following examples: providing HEPA air purifiers, indoor air quality monitors, N95 masks, air quality education for all households within the affected area, and outdoor air quality monitors for the wider community. The comment also summarizes what the commenters believe the benefits will be from adding such a mitigation measure to the EIR, and that they recommend the mitigation measure be reflected in the project's community benefits agreement.

Regarding the request for HEPA air purifiers, air quality monitors, N95 masks, and air quality education, please refer to Master Response 1 (Air Quality).

Responses to Comment Letter 18 (Resilient San Bruno)

Response to Comment 18-1

The comment correctly summarizes the main features of the project, and raises concerns about local air pollution and health risks.

Comment noted. Please refer to Master Response 1 (Air Quality). No revisions to the Draft EIR are required.

Response to Comment 18-2

The commenter summarizes the potentially significant impacts analyzed in the Draft EIR and asserts that even with mitigations in place, impacts would be significant on all who use the project site, including workers, residents, patrons of businesses, and potentially adjacent communities.

Comment noted. The Draft EIR analyzes the impacts raised by the commenter in detail throughout the document. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 18-3

The comment includes an excerpt from Draft EIR Section 3.1, *Air Quality*, page 3.1-45. The commenter has added underlined emphasis to a portion of the excerpt pertaining to diesel particulate matter (DPM) emissions from truck traffic and toxic air contaminants from on-site laboratory uses, and expresses concern that the project's impacts on off-site receptors in the 5th Addition were not analyzed.

The Health Risk Analysis includes an analysis of impacts on off-site receptors, which were determined to be less than significant. Please refer to Master Response 1 (Air Quality). No revisions to the Draft EIR are required.

Response to Comment 18-4

The commenter requests that the Draft EIR consider an alternative that keeps the same number of housing units but includes a non-residential use other than life science.

As discussed on Draft EIR page 4-1, an EIR must analyze a reasonable range of alternatives that would feasibly attain most of the project objectives, and would avoid or substantially lessen any project significant impacts. An EIR need not consider every conceivable alternative, but rather must include a reasonable range of alternatives to foster informed decision-making. The Draft EIR considered nine alternatives, and ultimately carried forward for analysis three alternatives meeting CEQA criteria. No additional alternatives are required to provide the reasonable range of alternatives required by CEQA. It is also noted that the proposed P-D zoning would allow for the approval of life-science or office uses. In evaluating impacts from toxic air contaminants, the EIR assumes the development of life-science uses because that would be the maximum impact for that topic. However, a scenario similar to the one described in the comment (i.e., a scenario where commercial office uses would be developed with no life-science uses and no reduction in residential uses) could be built under the proposed Planned Development zoning.

Response to Comment 18-5

The commenters request that the City and project developers add mitigation measures into the EIR for community health protection and cites the following examples: providing HEPA air purifiers, indoor air quality monitors, N95 masks, air quality education for all households within the impacted area, and outdoor air quality monitors for the wider community. The comment also summarizes what the commenters believe the benefits will be from adding such a mitigation measure to the EIR, and that they recommend the mitigation measure be reflected in the project's community benefits agreement.

Regarding the request for HEPA air purifiers, air quality monitors, N95 masks, and air quality education, please refer to Master Response 1 (Air Quality). No revisions to the Draft EIR are required.

2.2 References

California Natural Resources Agency. 2018. Final Statement of Reasons for Regulatory Action Amendments to the State CEQA Guidelines OAL Notice File No. Z-2018-0116-12. Available: https://resources.ca.gov/CNRALegacyFiles/ceqa/docs/2018_ceqa_final_statement_of%20reasons_111218.pdf. Accessed: August 26, 2025.

Capitol Airspace Group. 2025. Memorandum regarding Tanforan Redevelopment Project.

San Francisco International Airport (SFO). 2020a. SFO's Sound Insulation Program. Available: https://www.youtube.com/watch?v=BNal2ZsZe0E. Accessed: August 26, 2025.

———. 2020b. Noise Insulation Program (NIP). Available: https://www.flysfo.com/about/community-noise/noise-office/sound-insulation-program. Accessed: August 26, 2025.

———. 2023. Noise Overview. Available: https://noise.flysfo.com/about/noise-overview/. Accessed: October 8, 2025.

U.S. Department of Transportation Federal Aviation Administration. 2020. Advisory Circular: Subject: Hazardous Wildlife Attractants on or near Airport. Available: Advisory Circular 150/5200-33C, Hazardous Wildlife Attractants on or near Airports, February 21, 2020. Accessed: August 26, 2025.

Chapter 3
Revisions to the Draft EIR

This section lists revisions that have been made to the Draft Environmental Impact Report (Draft EIR) for the Shops at Tanforan Shopping Center (project) following the 45-day public comment period. Revisions were made either in response to comments received on the Draft EIR or as staff-initiated changes to correct typographical errors. Staff-initiated text changes are indicated by an asterisk (*).

These changes and minor errata do not result in significant new information with respect to the proposed project, including the level of significance of project impacts or any new significant impacts. Therefore, recirculation of the Draft EIR pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15088.5 is not required.

Executive Summary

Page ES-13 in the Draft EIR is revised as follows.

Impact	Significance before Mitigation	Mitigation	Significance after Mitigation
Cultural Resources			
Impact CUL-2: The project would not cause a substantial adverse change in the significance of a known archaeological resource, pursuant to Section 15064.5.	Significant	• **Mitigation Measure CUL-2-A:** Conduct Cultural Resource Awareness Training <u>and Exploratory Trenching</u> Prior to Project-Related Ground Disturbance ~~and Stop Work if Archaeological Deposits Are Encountered During Ground-Disturbing Activities~~. • **Mitigation Measure CUL-2-B:** Stop Work if Buried Cultural Deposits are Encountered During Construction Activities.	Less than Significant

Page ES-14 in the Draft EIR is revised as follows.

Impact	Significance before Mitigation	Mitigation	Significance after Mitigation
Cultural Resources			
Impact C-CUL-2: [a] The project, in combination with past, present, and reasonably foreseeable future projects, would result in a significant cumulative impact on archaeological resources, but the project's contribution would be less than cumulatively considerable with mitigation.	Significant	• **Mitigation Measure CUL-2-A:** Conduct Cultural Resource Awareness Training and Exploratory Trenching Prior to Project-Related Ground Disturbance ~~and Stop Work if Archaeological Deposits Are Encountered During Ground-Disturbing Activities~~. • **Mitigation Measure CUL-2-B:** Stop Work if Buried Cultural Deposits are Encountered During Construction Activities.	Less Than Cumulatively Considerable

Page ES-16 in the Draft EIR is revised as follows.

Impact	Significance before Mitigation	Mitigation	Significance after Mitigation
Hazards and Hazardous Materials			
Impact HAZ-1: The project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	~~Less than~~ Significant	~~None required~~ • **Mitigation Measure HAZ-2-B:** Conduct a Hazardous Building Materials Survey prior to Demolition Activities and Hazardous Building Material Handling.	~~—~~ Less than Significant with Mitigation
Impact HAZ-2: The project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.	Significant	• **Mitigation Measure HAZ-2-A:** Prepare a Soil Management Plan Prior to Construction. • **Mitigation Measure HAZ-2-B:** Conduct a Hazardous Building Materials Survey prior to Demolition Activities and Hazardous Building Material Handling. • **Mitigation Measure HWQ-1:** Require Groundwater Monitoring Well Installation and Sampling Prior to Dewatering Activity.	Less than Significant with Mitigation

Page ES-17 in the Draft EIR is revised as follows.

Impact	Significance before Mitigation	Mitigation	Significance after Mitigation
Hydrology and Water Quality			
Impact C-HWQ-3: [a] The project, in combination with past, present, and reasonably foreseeable future projects, would result in a significant cumulative impact on drainage patterns, but the project's contribution would be less than cumulatively considerable.	Significant	**Mitigation Measure HWQ-~~2~~3:** Require a Site Survey To Verify Existing Drainage Capacity	Less Than Cumulatively Considerable

Page ES-18 in the Draft EIR is revised as follows.

Impact	Significance before Mitigation	Mitigation	Significance after Mitigation
Noise			
Impact NOI-1-A: Project construction would generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies.	Significant	• Best Management Practices for Construction Noise (All Hours): See Section 3.10, *Noise*. • **Mitigation Measure NOI-1-A:** Develop a Construction Noise Control Plan to Reduce Noise Outside Standard Construction Hours • **Mitigation Measure NOI-1-B:** Construct Temporary Noise Barrier Along the Project Perimeter Where Nighttime Construction Would Occur Within 500 Feet of Any Residential Receptor ~~Construct Temporary Noise Barrier along the Project Perimeter (where nighttime construction would occur within 500 feet of any sensitive receptor)~~	Significant and Unavoidable

Page ES-19 in the Draft EIR is revised as follows.

Impact	Significance before Mitigation	Mitigation	Significance after Mitigation
Noise			
Impact C-NOI-1: [a] The project, in combination with past, present, and reasonably foreseeable future projects, would result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in a local general plan or noise ordinance or applicable standards of other agencies.	Significant	• **Mitigation Measure NOI-1-A:** Develop a Construction Noise Control Plan to Reduce Noise Outside Standard Construction Hours • **Mitigation Measure NOI-1-B:** Construct Temporary Noise Barrier Along the Project Perimeter Where Nighttime Construction Would Occur Within 500 Feet of Any Residential Receptor ~~Construct Temporary Noise Barrier along the Project Perimeter (where nighttime construction would occur within 500 feet of any sensitive receptor)~~	Significant and Unavoidable

Page ES-21 in the Draft EIR is revised as follows.

Impact	Significance before Mitigation	Mitigation	Significance after Mitigation
Tribal Cultural Resources			
Impacts TCR-1 and TCR-2: The project would not cause a substantial adverse change in the significance of a Tribal cultural resource that is (a) listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources, as defined in Public Resources Code Section 5020.1(k), or (b) determined by the lead agency to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1.	Significant	• **Mitigation Measure CUL-2-A:** Conduct Cultural Resource Awareness Training and Exploratory Trenching Prior to Project-Related Ground Disturbance ~~and Stop Work if Archaeological Deposits Are Encountered During Ground-Disturbing Activities~~. • **Mitigation Measure CUL-2-B:** Stop Work if Buried Cultural Deposits are Encountered During Construction Activities.	Less than Significant

2.0 Project Description

Page 2-11 in the Draft EIR is revised as follows.

Proposed building heights would range from 1 to 7 stories (20 to 79 feet, 7 inches), with varying floor-to-floor heights. Maximum building heights would be within both the City's height limit maximum of 79 feet, 7 inches measured from grade, and the SFO-adopted safety height limits of ~~125~~127 feet to ~~145~~148 feet measured from AMSL, as defined from the origin of the North American Vertical Datum of 1988 (NAVD88). A conceptual building height plan is provided in Figure 2-10, Conceptual Building Height Plan.

Page 2-12 in the Draft EIR is revised as follows.

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

3.1 Air Quality

Pages 3.1-16 to 3.1-17 in the Draft EIR are revised as follows.

Existing Air Quality Conditions

CARB and EPA maintain ambient air quality monitoring stations within California. There are no monitoring stations in the City of San Bruno. The air quality monitoring station closest to the project site is the Arkansas Street monitoring station in the City of San Francisco, which monitors criteria air pollutants. The air quality trends from this station are used to represent ambient air quality in the project area. Ambient air quality in the project area from ~~2021~~2022 to ~~2023~~2024 (the most recent available period) is shown in Table 3.1-4. The pollutants monitored at the Arkansas Street station are ozone, CO, NO_2, PM_{10}, and $PM_{2.5}$. Monitoring data for lead and SO_2 are not provided, as the Arkansas Street station does not monitor these pollutants. Moreover, the Air District has not adopted lead and SO_2 thresholds because these pollutants are not emitted in appreciable quantities for most projects, and the SFBAAB is in attainment for these pollutants.

Table 0-1. Ambient Air Quality Data for the Project Area (~~2021~~2022–~~2023~~2024)

Pollutant Standards	~~2021~~2022	~~2022~~2023	~~2023~~2024
Ozone at San Francisco-Arkansas Station			
Maximum 1-hour concentration (ppm)	~~0.074~~0.070	~~0.070~~ 0.057	~~0.057~~ 0.04
Maximum 8-hour concentration (ppm)	~~0.054~~0.060	~~0.060~~ 0.046	~~0.046~~ 0.037
Fourth highest 8-hour concentration (ppm)	~~0.051~~0.044	~~0.044~~0.041	~~0.041~~0.036
Number of days standard exceeded			
CAAQS 1-hour standard (> 0.09 ppm)	0	0	0
CAAQS 8-hour standard (> 0.070 ppm)	0	0	0
NAAQS 8-hour standard (> 0.070 ppm)	0	0	0
Carbon Monoxide (CO) at San Francisco-Arkansas Station			
Maximum 8-hour concentration (ppm)	~~0.9~~1	~~1~~1.9	~~1.9~~1
Maximum 1-hour concentration (ppm)	~~1.2~~1.5	~~1.5~~4.4	~~4.4~~1.6
Number of days standard exceeded			
NAAQS 8-hour standard (> 9 ppm)	0	0	0
CAAQS 8-hour standard (> 9.0 ppm)	0	0	0
NAAQS 1-hour standard (> 35 ppm)	0	0	0
CAAQS 1-hour standard (> 20 ppm)	0	0	0
Nitrogen Dioxide (NO_2) from San Francisco-Arkansas Station			
Maximum state 1-hour concentration (ppm)	~~0.049~~0.046	~~0.046~~0.043	~~0.043~~0.040
Annual average concentration (ppm)	~~0.007~~0.008	~~0.008~~0.007	~~0.007~~No data
Number of days standard exceeded			
CAAQS 1-hour standard (0.18 ppm)	0	0	0
NAAQS 1-hour standard (0.100 ppm)	0	0	0
Particulate Matter (PM_{10}) at San Francisco-Arkansas Station			
Maximum state 24-hour concentration (mg/m^3)	~~33.0~~36.0	~~36.0~~44.9	~~44.9~~No data
Maximum national 24-hour concentration (mg/m^3)	~~32.2~~34.2	~~34.2~~43.8	~~43.8~~No data
National annual average concentration	~~8.2~~7.7	~~7.7~~7.4	~~7.4~~No data
Measured number of days standard exceeded			
CAAQS 24-hour standard (50 $\mu g/m^3$)	0	0	0
NAAQS 24-hour standard (150 $\mu g/m^3$)	0	0	0
Particulate Matter ($PM_{2.5}$) at San Francisco-Arkansas Station			
Maximum state 24-hour concentration (mg/m^3)	~~22.4~~29.0	~~29.0~~16.7	~~16.7~~No data
Maximum national 24-hour concentration (mg/m^3)	~~22.4~~29.0	~~29.0~~16.7	~~16.7~~No data
National annual average concentration	~~7.1~~6.7	~~6.7~~No data	~~No data~~No data
Measured number of days standard exceeded			
NAAQS 24-hour standard (> 35 $\mu g/m^3$)	0	0	0

Sources: CARB ~~2024e~~2025b; EPA ~~2024e~~2025.

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

An exceedance is not necessarily a violation.

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

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

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

Pages 3.1-21 to 3.1-22 in the Draft EIR have been revised as follows.

Carbon Monoxide

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

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

3.3 Cultural Resources

Pages 3.-25 and 3.3-26 in the Draft EIR have been revised as follows.

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

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

- **Determine if the resource is an historical resource.** The qualified cultural resources specialist or archaeologist shall determine if there is a potential for the resource to be a historical resource. Work can resume if there is no potential for the resource to qualify as a historical resource. If there is a potential for the resource to be a historical resource, the qualified cultural resources specialist or archaeologist shall prepare an Evaluation Plan.
- **Prepare an Evaluation Plan.** The Evaluation Plan shall be prepared specific to the resource and shall contain procedures used to determine if the discovered resource is an historical resource. The Evaluation Plan shall include enough discussion of background and context to provide for evaluation of the resource under the historical resource criteria. It shall include a description of procedures that will be used to gather information for the evaluation, which may include but not be limited to excavation, written documentation, interviews, and photography. For any archaeological resource testing, the Evaluation Plan shall describe testing procedures, such as surface collection, test excavations, analysis methods, and reporting procedure.

- **Implement Evaluation Plan.** The Evaluation Plan shall be implemented in the field, and the subsequent report shall evaluate the resource based on the criteria contained in the Evaluation Plan, making a conclusion whether the resource is historical. If the resource is not historical, protective barriers can be removed and work can continue in the area. If the resource is historical, the qualified cultural resources specialist or archaeologist shall prepare a Data Recovery Plan.
- **Prepare a Data Recovery Plan**. A Data Recovery Plan shall be prepared consistent with CEQA Guidelines Section 15126.4(b)(3)(C) and PRC Section 21083.2. The Data Recovery Plan will contain a description of how data recovery will mitigate impacts on the resource to less than significant. It shall contain a description of level of effort (e.g., quantity of excavation units), excavation procedures, laboratory methods, types of samples to be collected (e.g., sediment), and the techniques that will be used to obtain information about the features of the site that make it a historical resource. Additionally, the Data Recovery Plan shall include a description of the reporting procedure. Once the Data Recovery Plan is completed, fieldwork can commence. Work can resume in the area once the qualified cultural resources specialist/archaeologist determines that no additional information needs to be recovered to satisfy fieldwork, reporting, and documentation requirements to reduce impacts to less than significant.
- **Prepare a Data Recovery Report.** A Data Recovery Report shall be prepared following completion of data recovery fieldwork. The report shall present results of data recovery, including field methods used, location and size of excavations, and analysis of materials recovered. It shall contain conclusions made based on the fieldwork, as well as where any recovered artifacts, samples, and documentation will be curated. Curation facilities must meet requirements of 36 CFR 79. The Data Recovery Report shall be submitted to NWIC, with all impacted known resources recorded on Department of Parks and Recreation 523 forms.

In the event that inadvertent, potentially significant archaeological resources are encountered during ground-disturbing activities within Caltrans' Right-of-Way (ROW), the qualified cultural resources specialist or archaeologist shall immediately contact the Caltrans Office of Cultural Resource Studies at (510) 847-1977. A Caltrans staff archaeologist shall then evaluate the finds within 1 business day after contact. Additionally, the qualified cultural resources specialist or archaeologist shall contact a Caltrans staff archaeologist to review any potential data recovery plans prepared within Caltrans' ROW.

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

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

Moreover, in the event that an inadvertent burial discovery is made during ground-disturbing activities within Caltrans' ROW, the qualified cultural resources specialist or archaeologist shall immediately contact the Caltrans Office of Cultural Resource Studies at (510) 847-1977. A Caltrans staff archaeologist shall then evaluate the finds within 1 business day after contact.

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

3.5 Geology, Soils, and Paleontology

Page 3.5-5 in the Draft EIR is revised as follows (footnote 3 is not revised and is not included here).

The topography of the project site (including the main site and the northern parcel) slope from west to east. The elevation of the sites ranges from approximately ~~36.5~~43 to ~~66~~61 feet (NAVD88)[3] at the main site and ~~38.5 to 44.5~~43 feet (NAVD88) at the north parcel.

Page 3.5-15 in the Draft EIR is revised as follows (footnote 7 is not revised and is not included here).

The project site slopes from west to east and lies with elevations ranging from approximately ~~36.5~~43 to ~~66~~61 feet (NAVD88)[7] at the main site and ~~38.5 to 44.5~~43 feet (NAVD88) at the north parcel. Construction of the proposed project would require grading or disturbing an area of approximately 40 acres and excavating up to approximately 926,300 cubic yards of soil to a maximum depth of 45 feet below grade level under Scenario B. While the proposed project would involve changes to the existing grade, no unprotected, exposed soils at risk of substantial erosion would remain on the project site.

3.7 Hazards and Hazardous Materials

Page 3.7-7 in the Draft EIR is revised as follows (footnote 5 is not revised and is not included here).

As identified in the ALUCP, the project site is located within the Federal Aviation Regulation Part 77 sphere of influence, which is the boundary established to regulate obstructions to airspace navigation, including building heights. Based on these requirements, the ALUCP establishes height restrictions within specific contours of airport facilities throughout Area A and Area B in which the project site is located; specifically, as shown in Figure IV-17 in the ALUCP, the project site falls within a range of ~~125~~ 127 to ~~145~~ 148 feet above mean sea level (AMSL) as defined by the North American Vertical Datum of 1998 (NAVD88[5]) on the airport's critical aeronautical surfaces.

Since ground elevation at the project site ranges from ~~36~~ 43 to ~~66~~ 61 feet AMSL NAVD88 and assuming ground elevation would not change, the heights of the proposed buildings could be no higher than approximately ~~55~~ 74 and ~~90~~ 105 feet above ground level, depending on horizontal location, to be compatible with the Airspace Protection Policies of the SFO ALUCP. Such compatibility would also be contingent on the issuance of a Determination of No Hazard from the FAA for any proposed structures and determinations from C/CAG as the designated ALUC. Pertinent ALUCP policies are summarized below.

Pages 3.7-21—3.7-22 in the Draft EIR are revised as follows.

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 with Mitigation).

Construction

Project construction would involve routine transport, use, and disposal of hazardous materials such as solvents, paints, oils, grease, and caulking. Such transport, use, and disposal must comply with applicable regulations discussed under Section 3.7.2.1, *Regulatory Setting*. Although solvents, paints, oils, grease, and caulking would be transported, used, and disposed of during the construction phase, these materials are handled on a temporary basis and are typically used in construction projects and, thus, would not represent the routine transport, use, and disposal of acutely hazardous materials. Any spills or releases involving these materials are expected to be small, localized, and cleaned as they occur. In addition, a Stormwater Pollution Prevention Plan (SWPPP) would be prepared and implemented during project construction for coverage under the required Construction General Permit, in accordance with the requirements of the State Water Board. An SWPPP requires implementation of best management practices for hazardous materials storage and soil stockpiles, inspections, maintenance, employee training, and the containment of releases to prevent runoff to stormwater collection systems or waterways.

As discussed in Section 3.7.2, *Existing Conditions*, structures within the project site may contain hazardous building materials such as ACMs or lead-based paint. As mentioned, the project would demolish all existing uses on the project site with exception of the Century at Tanforan Theater and the Target. As such, demolition of existing structures may expose construction workers, the public, or the environment to hazardous materials such as lead-based paint, asbestos, and polychlorinated biphenyls (PCBs). The level of potential impact depends on the age, construction, and building materials of each building. Any activity that involves cutting, grinding, or drilling during building renovation or demolition, or relocation of underground utilities, could release friable asbestos fibers or lead dust, unless proper precautions are taken. Potential exposure to hazardous building materials would be reduced through appropriate identification, removal, and disposal according to applicable regulations, such as the Bay Area Air Quality Management District's (BAAQMD), Regulation 11 Hazardous Pollutants. Buildings to be demolished that have not been previously surveyed would require a Hazardous Building Materials Survey as described under **Mitigation Measure HAZ-2-B**. If hazardous building materials are identified, the materials would require proper abatement and disposal.

Therefore, project construction would not create a significant hazard for the public or the environment through the routine transport, use, or disposal of hazardous materials during construction, and this impact would be ***less than significant with mitigation***. No mitigation is required.

Page 3.7-22 in the Draft EIR is revised as follows.

To further address these risks, the project applicant would need to implement a Soil Management Plan (described in **Mitigation Measure HAZ-2-A**) to minimize the potential exposure of construction personnel to contaminated soils, unknown environmental conditions or subsurface features. Implementation of the Soil Management Plan would require coordination with the San Mateo County Environmental Health Division, which requires notification if soils or groundwater on or near the 1178 El Camino Real site or the San Bruno Police Station would be disturbed. In addition, to further address potential risks associated with contaminated groundwater, the project applicant would be required to conduct groundwater profiling to ensure adequate treatment and disposal of contaminated groundwater, if encountered, pursuant to **Mitigation Measure HWQ-1**. As construction would be conducted in coordination with the SMCDEH, the applicant would be subject to additional actions (to **Mitigation Measure HAZ-2-A** and **Mitigation Measure HWQ-1**) to further mitigate the potential exposure to, or release of residual, contaminated media on-site. If deemed necessary, these actions would be determined upon notification and consultation with the SMCDEH.

Similarly, as discussed under Impact HAZ-1, buildings slated for demolition that have not been previously surveyed for hazardous building materials including ACM and lead-based paint would require a Hazardous Building Materials Survey as described under **Mitigation Measure HAZ-2-B**. If hazardous building materials are identified, the materials would require proper handling, abatement, and disposal. With implementation of the identified mitigation measures and the standard regulatory compliance measures, potentially contaminated soils and groundwater, and potentially hazardous building materials, would be handled, transported, and disposed of in accordance with applicable local, state, and federal regulations and requirements.

Page 3.7-24 in the Draft EIR is revised as follows.

Mitigation Measure HWQ-1: Require Groundwater Monitoring Well Installation and Sampling Prior to Dewatering Activity.

Refer to Section 3.8, *Hydrology*, of this EIR.

Page 3.7-25 in the Draft EIR is revised as follows.

In general, height limitations and restrictions in the area are defined by the SFO Airport Influence Area. According to the 2012 SFO ALUCP, notification and consultation with the FAA under CFR Part 77.9 would be required for implementation of the project. Building heights under the project would be subject to maximum height limits in accordance with the FAA and SFO ALUCP Land Use Compatibility Plan requirements; maximum heights would depend on the applicable height contours under these regulations. As mentioned previously, the ground elevation at the project site ranges from ~~36~~43 to ~~66~~61 feet AMSL NAVD88. Assuming ground elevations do not change, the heights of the proposed buildings (i.e., critical aeronautical surfaces) could be no higher than approximately ~~55~~74 and ~~90~~105 feet above ground level to be compatible with the SFO ALUCP (equivalent to ~~125~~127 to ~~145~~148 feet AMSL). Such compatibility would also be contingent on the issuance of a Determination of No Hazard from the FAA for any proposed structures and determinations from C/CAG as the designated ALUC. As shown in Figure 2-10 in Chapter 2, *Project Description*, proposed building heights would range from 20 to 80 feet above ground level, depending on the location within the project site. The use of construction equipment (such as building cranes) or the construction of buildings with heights in excess of ~~55~~74 feet above ground level could also pose a safety hazard to construction workers and future residents. **Mitigation Measure HAZ-5** requires the applicant to submit a plan with a list of equipment to be used during construction that includes their height and proposed area of operation to the City for review and approval. The mitigation measure also requires compliance with SFO building height requirements. Mitigation Measure HAZ-5 supersedes Mitigation Measure HAZ-5.1 in the Housing Element Initial Study/Mitigated Negative Declaration (IS/MND) and is equally as effective in mitigating impacts on aviation safety at the project site. With issuance of a Determination of No Hazard from the FAA, and compliance with **Mitigation Measure HAZ-5**, project construction and operation would comply with SFO ALUCP safety guidelines and would not pose a risk to aviation safety.

Page 3.7-26 in the Draft EIR is revised as follows.

According to ALUCP Policy AP-4, specific building characteristics can create hazards to aircraft in flight, including highly reflective buildings or building features, bright lights, including search lights or laser displays, or otherwise distracting lights. The project does not include any such features. The project would comply with ALUCP Policy AP-4 and project conditions of approval to ensure that no building features, including any rooftop solar panels, would use highly reflective materials with the potential to interfere with the vision of pilots at SFO. All lighting would comply with Title 24, CalGreen outdoor lighting requirements for non-residential occupancies~~, and all Dark Sky Initiatives applicable to San Bruno~~. Additionally, offsite roadway

lighting would comply with San Bruno lighting standards for fixture selection and illumination requirements. Therefore, the risk of hazards to aircraft from light and glare is considered low.

Pages 3.7-27 and 3.7-28 in the Draft EIR are revised as follows.

Mitigation Measure HAZ-5: Demonstrate Compliance with San Francisco International Airport Airspace Compatibility Policies.

The project applicant shall comply with the following measures.

- Prior to the issuance of any construction or building permits, the applicant shall submit a plan with a list of equipment to be used during construction that includes their height and proposed area of operation to the Director of Community Development or the Director's designee. The use of equipment in locations where it would penetrate critical aeronautical surfaces shall be expressly prohibited by any construction or building permits issued, unless use of specific temporary construction equipment is so approved by the FAA. The use of temporary construction equipment (e.g., cranes) may be used to construct the permanent structures. The SFO ALUCP does not consider temporary construction cranes; therefore, cranes are not restricted to the maximum heights defined in the SFO ALUCP. Proposed crane work zones must be submitted to the FAA for evaluation pursuant to 14 CFR Part 77, pursuant to the filing of Form 7460-1 (Form 7460-1 must be filed at least 45 days prior to the start of construction), for a determination that construction equipment heights are not a hazard to air navigation. ~~Cranes may be in excess of ALUCP surfaces and may exceed FAA height constraints. Since cranes are used on a temporary basis, FAA approvals would be pursued (as needed) to allow these pieces of equipment to operate through the construction of the permanent structures.~~

  The aforementioned equipment plan shall include a page depicting the critical aeronautical surfaces on-site, a list of all equipment with heights of ~~55~~74 feet or greater and their respective heights, and informs construction workers that the use of equipment with heights that would penetrate critical aeronautical surfaces is prohibited.

- The project shall comply with Policy AP-3 of the Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport (ALUCP). All permanent buildings must comply with the maximum allowable heights in the ALUCP and must receive a Determination of No Hazard from the FAA. In all cases, the lower of the two allowable heights is the controlling height. Buildings with heights in excess of the applicable critical aeronautical surface as shown in Exhibit IV-17 of the ALUCP shall be prohibited unless the FAA determines the proposed building height is not a hazard to air navigation in an aeronautical study prepared pursuant to the filing of Form 7460-1 (Form 7460-1 must be filed at least 45 days prior to the start of construction). In addition to the completion of Form 7460-1, a preliminary review with the FAA should be requested prior to final design to ensure project compatibility. Proof of compliance with Policy AP-3 of the ALUCP shall be provided to the Director of Community Development or the Director's designee prior to issuance of any construction or building permits.

- In accordance with FAA Advisory Circular (AC) 150/5200-33C, *Hazardous Wildlife Attractants on or near Airports*, a Qualified Airport Wildlife Biologist, as defined in Advisory Circular 150/5200-36, *Qualifications for Wildlife Biologist Conducting Wildlife Hazard Assessments and Training Curriculums for Airport Personnel Involved in Controlling Wildlife Hazards on Airports*, shall evaluate the project's landscape plan to ensure that the proposed landscaping features will not attract hazardous wildlife that could pose a threat to aviation safety. ~~The Qualified Airport Wildlife Biologist shall inspect project landscaping annually for a period of ten years after installation of the land scape plan is complete to ensure safe conditions as the landscape matures. If project landscape is found to attract hazardous~~

~~wildlife, corrective actions shall be taken as determined by the Qualified Airport Wildlife Biologist, including but not limited to removal and replacement of landscape with alternative plant varieties and/or layouts.~~

3.8 Hydrology and Water Quality

Page 3.8-14 in the Draft EIR is revised as follows.

The existing storm drain network on the project site includes four connections to the ~~San Bruno~~ storm drain system. Three relatively minor connections are located along Sneath Lane, and one major connection is located through the Bay Area Rapid Transit (BART) parcel to Huntington Avenue (Appendix 3.8-1). A 36-inch storm drain is located on the northern portion of the project site on Sneath Lane and an existing 48-inch City storm drain is located on the eastern boundary of the project site on Huntington Avenue. All four of these connections drain easterly along Tanforan Avenue/Shaw Road before discharging into Navigable Slough, a tributary of Colma Creek. Almost the entire project site discharges into this system. A very small amount of surface runoff in the southeast corner of the project site flows into a catch basin located in that corner, which ties into a different portion of the City's storm drain system that drains southerly before eventually discharging into San Bruno Creek.

Page 3.8-28 in the Draft EIR is revised as follows.

Mitigation Measure HWQ-3: Require a Site Survey to Verify Existing Drainage Capacity.

A site-specific survey shall be required to demonstrate that the existing system in Sneath Avenue can adequately accommodate the additional stormwater flow rates and volumes. Invert elevation data shall be required to determine precise drainage patterns. If required so as not to exceed existing discharge rates to the Sneath Lane drainage system, the project shall detain and meter flow rates on-site. The study and any on-site detention and flow metering plans shall be prepared by the project applicant and provided to the City Public Works Department for review and approval prior to the issuance of the first building permit for a new building ~~construction permits~~.

3.9 Land Use

Page 3.9-5 in the Draft EIR is revised as follows (footnote 5 is not revised and is not included here).

The ALUCP also establishes airport vicinity height limitations to protect public safety, health, and welfare by ensuring that aircraft can safely fly in the airspace around an airport and to protect the operational capability of airports. As noted in the ALUCP, the height of new development must be maintained below defined obstacle clearance surfaces. As shown in Figure IV-17 in the ALUCP, the project site falls within a range of ~~125~~127 to ~~145~~148 feet above mean sea level (AMSL) as defined by the North American Vertical Datum of 1998 (NAVD88[5]) on the airport's critical aeronautical surfaces. Since ground elevation at the project site ranges from ~~36~~43 to ~~66~~61 feet AMSL NAVD88 and assuming ground elevation would not change, the heights of buildings on the project site could be no higher than approximately ~~55~~74 and ~~90~~105 feet above ground level, depending on horizontal location, to be compatible with the Airspace Protection Policies of the SFO ALUCP.

Pages 3.9-22 and 3.9-23 in the Draft EIR are revised as follows.

INCONSISTENT (CONSISTENT WITH MITIGATION). As detailed in Section 3.7, *Hazards and Hazardous Materials*, the ground elevation at the project site ranges from ~~36~~43 to ~~66~~61 feet AMSL NAVD88. Assuming ground elevations do not change, the heights of the proposed

buildings (i.e., critical aeronautical surfaces) could be no higher than approximately ~~55~~74 and ~~90~~105 feet above ground level to be compatible with the SFO ALUCP (equivalent to ~~125~~127 to ~~145~~148 feet AMSL). Such compatibility would also be contingent on the issuance of a determination of no hazard from the FAA for any proposed structures and determinations from C/CAG as the designated ALUC. As shown in Figure 2-10 in Chapter 2, *Project Description*, proposed building heights would range from 20 to 80 feet above ground level, depending on the location within the project site. However, the use of construction equipment (such as building cranes) or the construction of buildings with heights in excess of ~~55~~74 feet above ground level could pose a safety hazard to construction workers and future residents inconsistent with height restriction standards. As a result, the project as proposed would not be consistent with this policy. It is important to note that the project's inconsistency with Implementing Policy HS-51 alone does not constitute an impact under CEQA. Policy conflicts are considered environmental impacts only when the policies themselves were adopted for the purpose of avoiding or mitigating an environmental effect, and such conflicts constitute significant environmental impacts only when the resulting direct environmental effects are significant. Nonetheless, these underlying impacts are addressed by implementation of Mitigation Measure HAZ-5. Furthermore, notification and consultation with the FAA under CFR Part 77.9 and subsequent determination of no hazard to air navigation would be required for implementation of the proposed project. Therefore, with implementation of Mitigation Measure HAZ-5, the proposed project would be consistent with Implementing Policy HS-51.

Page 3.9-37 in the Draft EIR is revised as follows.

Height limitations. As noted above, the project site falls within a ~~125~~127 to ~~145~~148 feet AMSL contour per SFO's critical aeronautical surfaces map. Given existing elevations at the project site range from ~~33~~43 to ~~66~~61 feet AMSL, the heights of the proposed buildings on the project site could be no higher than approximately ~~55~~74 and ~~90~~105 feet above ground level pursuant to FAA and ALUCP regulations. As described in Chapter 2, *Project Description*, proposed building heights would be 1 to 7 stories or approximately 20 to 80 feet above ground level, depending on the location within the project site. In addition, as detailed in Section 3.7, *Hazards and Hazardous Materials*, the use of construction equipment (such as building cranes) or the construction of buildings with heights in excess of ~~55~~74 feet above ground level could pose a safety hazard to construction workers and future residents. However, the proposed project would implement **Mitigation Measure HAZ-5**, which would require the applicant to submit a plan with a list of equipment to be used during construction that includes their height and proposed area of operation to the City for review and approval. The mitigation measure also requires compliance with SFO building height requirements. Furthermore, notification and consultation with the FAA under CFR Part 77.9 and subsequent determination of no hazard to air navigation would be required for implementation of the proposed project. Therefore, with implementation of **Mitigation Measure HAZ-5**, the proposed project would be compliant with FAA and ALUCP regulations, and would ensure that the project does not result in new buildings that exceed applicable ALUCP building height limits. The proposed project would be consistent with the height clearances established in the ALUCP.

Page 3.9-42 in the Draft EIR is revised as follows.

As discussed in Chapter 2, *Project Description*, the project would be subject to the height restrictions and limitations imposed by Ordinance No. 1446. Proposed building heights would range from 1 to 7 stories (20 feet to 79 feet, 7 inches), with varying floor-to-floor heights, and building maximum heights within the City's height limit maximum of 79 feet 7 inches measured from grade, and the SFO-adopted safety height limits of ~~125~~127 to ~~145~~148 feet measured from AMSL, as defined from the origin of the North American Vertical Datum of 1988 (NAVD88). Given the project is consistent with the development restrictions imposed by Ordinance 1446, impacts due to conflicts with this ordinance would be ***less than significant***.

3.10 Noise

Mitigation Measure NOI-1-B on page 3.10-30 in the Draft EIR is revised as follows.

Mitigation Measure NOI-1-B: Construct Temporary Noise Barrier Along the Project Perimeter Where Nighttime Construction Would Occur Within 500 Feet of Any Residential Receptor~~)~~.

The contractor(s) shall install a temporary noise barrier along the length of the project perimeter where nighttime construction would occur within 500 feet of any residential receptor. The sound wall shall abut project construction activities and, wherever feasible, shall be located within the direct line-of-sight path between the noise source and nearby sensitive receptors; it shall be constructed in advance of any non-daytime project construction (i.e., construction that takes place between 10:00 p.m. and 7:00 a.m.) occurring within 500 feet of any sensitive receptor. The barrier shall be constructed of material that has a surface weight of at least 1 pound per square foot and has an acoustical rating of at least 25 Sound Transmission Class (STC). This can include a temporary barrier constructed with plywood supported on a wood frame, sound curtains supported on a frame, or other comparable material.

Mitigation Measure NOI-3 on page 3.10-53 in the Draft EIR is revised as follows.

Mitigation Measure NOI-3: Develop Airport Noise Reduction Plan for Residential Dwellings.

The project applicant shall retain an acoustical engineer to conduct a noise analysis and generate a Noise Reduction Plan that determines the treatments and measures necessary to ensure interior noise levels (attributable to exterior sources) in any habitable room associated with project residences would be 45 dBA CNEL, or less. Because the project site is within the 70 dBA CNEL contour for SFO, and because existing measured noise levels in 2024 on the project site were in the range of 73 to 76 dBA CNEL (based on measurements LT-1, LT-8 and LT-9), the use of acoustical design features would be required to ensure interior noise levels would be below 45 dBA CNEL. The analysis and plan shall determine the specific design features and construction materials needed to sufficiently reduce interior noise levels<u>, and include provisions to ensure ongoing efficacy of such features and materials</u>. These may include:

- Sound-rated windows and skylights
- Reducing or eliminating the use of skylights
- Upgraded insulation
- Upgraded exterior wall and roof/attic construction
- Sound-rated doors
- Minimization of vents and other openings in the building envelope
- Ventilation upgrades to ensure windows can remain closed

~~Project dwellings shall be designed so that interior noise levels will meet the Title 24 interior noise standard of 45 dBA CNEL~~The plan shall be provided to and approved by the San Bruno Department of Community Development prior to the issuance of the first residential construction permit. <u>The project applicant shall ensure that project dwellings incorporate the design features identified in the plan and are designed so that interior noise levels will meet the Title 24 interior noise standard of 45 dBA CNEL.</u>

3.14 Transportation

Page 3.14-11 in the Draft EIR is revised as follows.

> Additionally, the average load on SamTrans Route ECR near the project site is 20 passengers per bus, compared to a maximum bus capacity of approximately ~~120~~70 passengers. Therefore, at the current operating frequency of 15-minute headways of Route ECR, there is additional capacity of approximately ~~400~~200 passengers per hour.

The text on page 3.14-17 has been revised as follows.

> The Centennial Way Trail provides Class I facility access to the site; it starts at the South San Francisco BART Station and terminates at the San Bruno BART Station. Currently, Class II bicycle lanes are provided along Sneath Lane east of Sea Biscuit Avenue, and a small stretch of Commodore Drive, west of the project site. The Walk 'N Bike Plan proposes a Class II lane with a road diet to close the network gap on Sneath Lane between National and Huntington Avenue, a mix of Class II and Class III facilities on Commodore Drive, and a Class IV separated bicycle way along the Huntington Avenue/San Antonio corridor from Sneath Lane to San Mateo Avenue. The City of San Bruno is currently undergoing the Huntington Avenue Pedestrian/Bikeway Safety Project, which will bring the first dedicated Class IV two-way cycle track to the City. These facilities will include concrete barriers and other streetscape improvements to enhance safety for pedestrians and bicyclists along Huntington Avenue. The bicycle infrastructure will extend from San Bruno Avenue to Sneath Lane and connect to the Centennial Way Trail.

Appendices

Draft EIR Appendix 3.8-1, *Storm Drain System Capacity Study,* is replaced with Final EIR Appendix 3.8-1, *Storm Drain System Capacity Study,* attached to this Final EIR.

FEIR Appendix 3.8-1

Storm Drain System Capacity Study

STORM DRAIN SYSTEM CAPACITY STUDY

Tanforan Mall Redevelopment Project

PRODUCED FOR CITY OF SAN BRUNO

SEP 2025 (FINAL_REV1)

660 Mission Street, 2nd Floor
San Francisco, CA 94105
(415) 800-6805 www.lotuswater.com

Lotus Water engineering

CONTENTS

1 Model Development 3

1.1 Existing Conditions Model Development 3

1.2 Proposed Conditions Model Development 5

2 Model Results 6

2.1 Existing Conditions Model Results 6

2.2 Proposed Conditions Model Results 7

2.3 Conclusions 8

1 MODEL DEVELOPMENT

1.1 Existing Conditions Model Development

An existing conditions model was developed of Tanforan Mall to determine peak flow and volumes draining to the San Bruno storm drain system during the 25-year, 24-hour storm.

The existing storm drain network at Tanforan Mall has multiple connections to the San Bruno storm drain system. BKF Engineers reviewed the existing site utility plan and as-built drawings to develop the existing condition drainage network map (Figure 1), which Lotus Water used as the basis for constructing the existing conditions SWMM model. Engineering judgement was used to fill gaps in the model where pipe slope, inverts, and diameters were missing. The existing drainage network has connections to San Bruno's storm drain system at four points as shown in Figure 1. Three relatively minor connections are located along Sneath Lane, and one major connection is located through the BART parcel to Huntington Ave. All four of these connections are believed to drain easterly along Tanforan Ave/Shaw Rd before discharging into Navigable Slough, a tributary of Colma Creek.

Figure 1. Existing Storm Drain on Tanforan Mall with Multiple Outlets

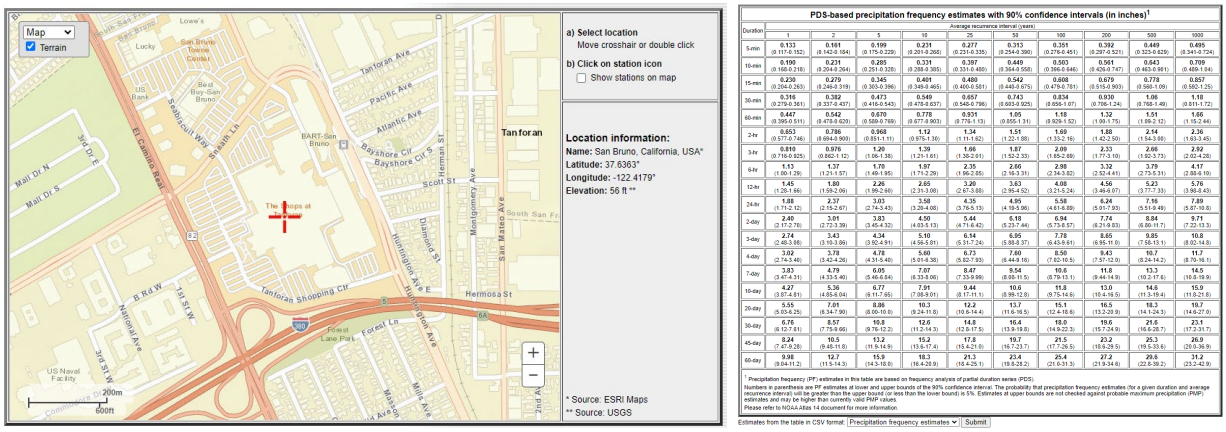


Subcatchments draining to each catch basin were delineated using the Digital Elevation Models (DEM's) from the 2017 San Mateo County LiDAR project, which covers all of San Mateo County. Roof areas were manually delineated with assumptions made about their connections to the onsite storm drain system based on proximity and adjacent topography.

Impervious surface for each subcatchment was determined using the San Mateo County Impervious Surfaces map. This data set is a 5-class land use and land cover map of San Mateo County reflecting the state of the landscape in summer, 2018 when 6-inch imagery was collected for San Mateo County. The existing site is almost entirely impervious with a small amount of landscaping in parking lots.

Per the 2014 San Bruno SDMP, the City's design storm for the storm water collection system is the 25-year 24-hour storm. Using NOAA Atlas 14, the 25-year 24-hour storm at Tanforan is 4.35 inches. The design storm depth was assigned a type 1A SCS rainfall distribution to be consistent with the modeling performed for the 2014 SDMP.

Figure 2 NOAA Atlas 14 for 25-year 24-hour Storm



Pervious areas are modeled assuming well-draining urban land per NRCS hydrologic soil information. Green-Ampt parameters for silt loam or a C-type soil were used from the EPA SWMM 5 manual shown below in Figure 3. The following parameters were used to represent pervious areas on site:

- Saturated hydraulic conductivity of 0.2 inches per hour
- Suction head of 6.6 inches
- Initial deficit 0.3

Figure 3 EPA SWMM Manual Green Ampt Parameters by Soil Type

Soil Texture Class	K	Ψ	ϕ	FC	WP
Sand	4.74	1.93	0.437	0.062	0.024
Loamy Sand	1.18	2.40	0.437	0.105	0.047
Sandy Loam	0.43	4.33	0.453	0.190	0.085
Loam	0.13	3.50	0.463	0.232	0.116
Silt Loam	0.26	6.69	0.501	0.284	0.135
Sandy Clay Loam	0.06	8.66	0.398	0.244	0.136
Clay Loam	0.04	8.27	0.464	0.310	0.187
Silty Clay Loam	0.04	10.63	0.471	0.342	0.210
Sandy Clay	0.02	9.45	0.430	0.321	0.221
Silty Clay	0.02	11.42	0.479	0.371	0.251
Clay	0.01	12.60	0.475	0.378	0.265

K = saturated hydraulic conductivity, in/hr
Ψ = suction head, in.
ϕ = porosity, fraction
FC = field capacity, fraction
WP = wilting point, fraction

Source: Rawls, W.J. et al., (1983). *J. Hyd. Engr.*, 109:1316.

1.2 Proposed Conditions Model Development

A proposed condition model was developed based on the Tanforan Mall Master Plan "maximum" mixed-use scenario. The proposal includes several buildings, parking garages, residential buildings, roadways, and garden plazas.

Subcatchments were delineated from the proposed grading plan and proposed storm drain utility plan. Assumptions were made about how buildings would drain based on the C.3 checklist, which groups buildings with at-grade areas together with bioretention planters.

Structures were modeled as 100% impervious. Courtyard areas between buildings were modeled with a percent impervious that matched Landscape Zones and C.3 checklist provided in Tanforan Phase 1 Application. The following impervious coverages were used for areas shown in Figure 4:

- Office/Lab amenity landscape = 66% impervious
- Residential courtyard = 42% impervious
- Retail gardens = 70% impervious
- Perimeter landscape = 79% impervious

Figure 4 Proposed Landscape Zones in Proposal and in Model



The proposed site storm drain system was modeled to match the proposed utility plan provided in the Tanforan Phase 1 Application.

2 MODEL RESULTS

2.1 Existing Conditions Model Results

Table 1. 25-year 24-hour storm flows from Tanforan Mall under existing conditions

Connection to San Bruno SD	Max. Total Inflow (cfs)	Total inflow (MG)	Contributing Area (ac)
Huntington1	38.98	4.31	37.0
Huntington2	0.57	0.064	0.5
Sneath1	1.31	0.147	1.3
Sneath2	0.53	0.059	0.5
Sneath3	3.51	0.392	3.3
Total	44.9	4.972	42.64

Figure 5. Existing conditions model showing drainage area by connection to San Bruno SD



2.2 Proposed Conditions Model Results

Table 2. 25-year 24-hour storm flows from Tanforan Mall under proposed conditions

Connection to San Bruno SD	Peak Flow (cfs)	Total Volume (MG)	Contributing Area (ac)
Huntington1	33.91	3.39	33.6
Huntington2	0.34	0.032	0.3
Sneath1	4.33	0.426	4.2
Sneath2	2.43	0.236	2.4
Sneath3	2.19	0.22	2.1
Total	43.2	4.304	42.64

Figure 6. Proposed conditions model showing drainage area by connection to San Bruno SD

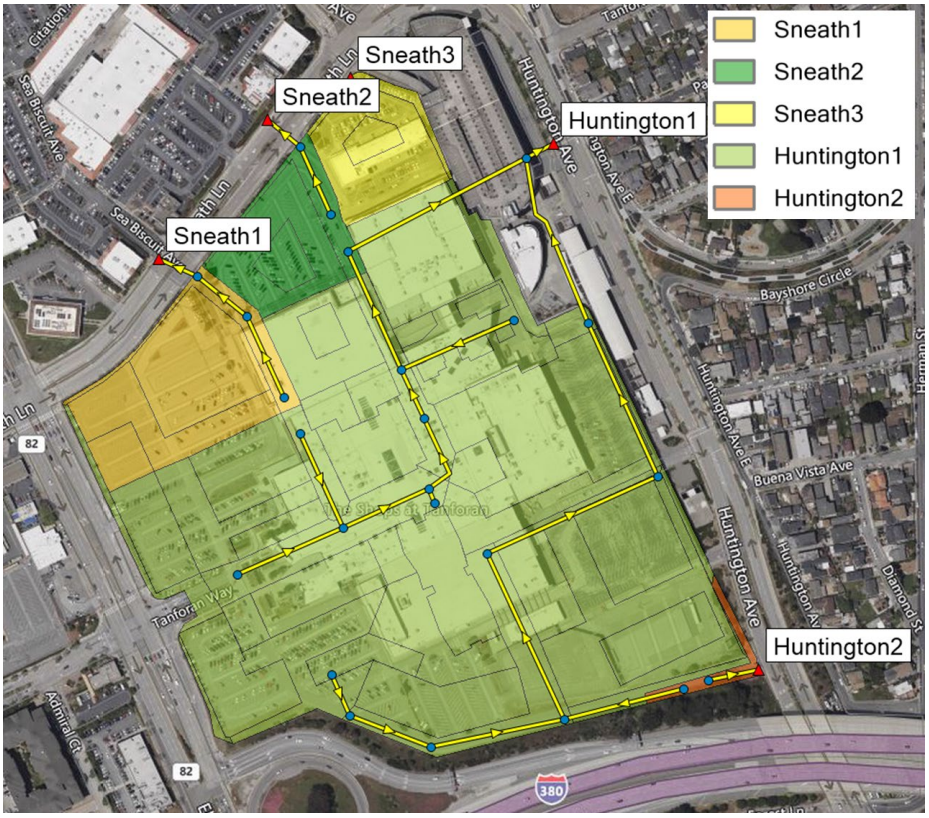


Table 3. Comparison Between Existing and Proposed Model Results

	Existing Conditions	Proposed Conditions	% Change
Max. Total Inflow (cfs)	44.9	43.2	-3.8%
Total inflow (MG)	4.97	4.30	-13%
Contributing Area (ac)	42.64	42.64	0%

2.3 Conclusions

Under proposed conditions the model indicates the site will produce less total runoff and lower peak flows since the proposal includes the addition of landscape areas and bioretention planters throughout the development to meet C.3 requirements. The model predicts a 3.8% reduction to peak flow and a 13% reduction in total runoff volume for the 25-year, 24-hour storm. Therefore, the aggregate peak flow and total volume being discharged to the receiving storm drain system will decrease.

The proposed storm drain utility plan attempts to maintain the tributary area draining to each connection to San Bruno's storm drain system. However, based on best available information for the existing drainage system, approximately 3.6 acres of drainage area will shift from Huntington Avenue to Sneath Lane under proposed conditions.

Table 4. Drainage Area to San Bruno SD System for Existing and Proposed Conditions

	Existing Contributing Area (ac)	Proposed Contributing Area (ac)	Change (+/- ac)
Huntington1	37.0	33.6	-3.4
Huntington2	0.5	0.3	-0.2
Sneath1	1.3	4.2	+3
Sneath2	0.5	2.4	+1.9
Sneath3	3.3	2.1	-1.2
Total	42.6	42.6	0.0

As a result of the shift in drainage areas under proposed conditions, the storm drain mains on Huntington Avenue are predicted to experience a decrease in peak flow of 5.3 CFS (-13%) and in total volume of 0.952 MG (-22%). Conversely, the storm drain mains on Sneath Lane are predicted to experience an increase in peak flow of 3.6 CFS (67%) and in total volume of 0.284 MG (47%). The storm drain mains along Sneath Lane range from 16" to 24" in diameter at the Tanforan connection points. While the additional flow is not of a magnitude expected to cause significant flooding issues, especially considering this area has not previously experienced capacity concerns, the increase is still notable. Therefore, further analysis is required to confirm whether the existing system can adequately accommodate the additional flow without adverse impacts.

As shown in Figure 6, almost the entire site is believed to discharge into the City's storm drain system at the four connection points labeled Sneath 1-3 and Huntington 1, which ultimately drain to Colma Creek. A very small amount of surface runoff in the southeast corner of the site is believed to flow into a catch basin located in that corner and tie into a different portion of the City's storm drain system that drains southerly before eventually discharging into San Bruno Creek. The peak flows and total volumes draining toward each receiving water body (Colma Creek and San Bruno Creek) are decreased under proposed conditions, so downstream modeling of the storm drain system was deemed unnecessary.